Appendix 1-A

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Additional Delaware Rules limiting Jurisdiction of Professional Board which has no jurisdiction to grant monetary damages, nominal relief against itself or the Delaware Supreme Court only sanctions for attorney misconduct. Sanctions and other relief is NOT within the limited jurisdiction of the Board proceeding against the Supreme Court's conduct in personal capacity or the state

Del. Law. R. of Disciplinary Proc. I

I. STRUCTURE AND SCOPE

Delaware Rules of Disciplinary Procedure

Del. Law. R. of Disciplinary Proc. Rule 1 (a)
Rule 1. Delaware Supreme Court.

> (a) Inherent power and authority. Pursuant to the Court's inherent power and authority over the regulation of the legal profession, the Court shall maintain appropriate standards of professional conduct for all lawyers subject to its jurisdiction, dispose of individual cases of lawyer discipline and disability, and administer the lawyer disciplinary system

Del. Law. R. of Disciplinary Proc. Rule 5

Rule 5. Jurisdiction.

> (a) Lawyers admitted to practice. Any lawyer admitted to practice law in this jurisdiction, including any formerly admitted lawyer with respect to acts committed prior to suspension, disbarment, transfer to inactive status or retirement, or with respect to later acts which amount to the practice of law or constitute a violation of these Rules or of the Delaware Lawyers' Rules of Professional Conduct, or any rules or code the Court adopts later; any lawyer specially admitted by a court of this jurisdiction for a particular proceeding; and any lawyer not admitted in this jurisdiction who practices law or renders or offers to render any legal services in this jurisdiction, is subject to this Court and the Board's disciplinary jurisdiction.
> (b) Former judges. A former judge who has resumed the status of a lawyer is subject to the disciplinary jurisdiction of the Court under these Rules not only for conduct as a lawyer but also for misconduct that occurred while a judge and that would have been grounds for lawyer discipline.
> (c) Incumbent judges. Any lawyer who is an incumbent judge is subject to the disciplinary jurisdiction of the Court under these Rules with respect to acts committed prior to taking office as a judge.

(d) Powers not assumed. These Rules shall not be construed to deny to any court the powers necessary to maintain control over its proceedings.

Del. Law. R. of Disciplinary Proc. Rule 8

Rule 8. Sanctions.

(a) Types of sanctions. Misconduct shall be grounds for one or more of the following sanctions:
(1) Disbarment by the Court;
(2) Suspension by the Court for an appropriate fixed period of time not in excess of three years;
(3) Immediate interim suspension by the Court, pending final determination of disciplinary sanctions, or suspension by the Court as a result of "show cause" proceedings under Rule 17 or on a sua sponte basis;
(4) Public probation by the Court;
(5) Public reprimand by the Court;
(6) Private admonition by the Court or, with the consent of the respondent, by the PRC;
(7) Private probation by the Court or, with the consent of the respondent, by PRC;
(8) Conditional diversion by the Court or, with the consent of the respondent, by PRC;
(9) Court-ordered restitution to persons financially injured and Court-ordered reimbursement to the Lawyers' Fund for Client Protection; and
(10) Limitation by the Court on the nature and/or extent of the respondent's future practice.
(b) Conditions. Written conditions may be attached to any disciplinary sanction.
(c) Mitigating or aggravating circumstances. Mitigating or aggravating circumstances that affect the nature or degree of discipline to be imposed in a matter shall be fully set forth in the Board report recommending to the Court an appropriate sanction.
(d) Dismissals. A disciplinary matter which results in a dismissal, with or without conditions or cautionary language, shall not be considered as the imposition of a disciplinary sanction.
(e) Conditional diversion. With the consent of the respondent, the recommendation of the ODC, and the approval of the PRC, conditional diversion may be granted, except if the misconduct is serious including but not limited to the misappropriation of funds or property or other misconduct that is serious enough to warrant suspension or disbarment.

Del. Law. R. of Disciplinary Proc. Rule 9 (d) (2)

"(2) The respondent shall serve an answer upon the ODC and file the original with the Administrative Assistant within **20 days after service of the petition**, unless the time is

extended by the Chair or Vice Chair of the Board. In the event the respondent fails to serve an answer commitment or adjudication of incompetency. If a lawyer has been judicially declared incompetent or is involuntarily committed on the grounds of incompetency or disability, the Court, upon proper proof of the fact, may enter an order immediately transferring the lawyer to disability inactive status for an indefinite period until further order of the Court. A copy of the order shall be served er within the prescribed time, all of the allegations and charges in the petition shall be deemed admitted, such that the sole remaining issue to be determined by the Board shall be the appropriate disciplinary sanction."

Del. Law. R. of Disciplinary Proc. Rule 9 (d)(3):

"The Administrative Assistant shall serve a notice of hearing upon the ODC and the respondent, identifying the members of the Board assigned to the matter, and the date and place of the hearing. The notice shall be given at least 20 days in advance of the date of the hearing. The notice of hearing shall state that the respondent is entitled to be represented by a lawyer at the respondent's expense, to cross-examine witnesses, and to present evidence."

Del. Law. R. of Disciplinary Proc. Rule 9 (d) (3)

"(3) The Administrative Assistant shall serve a notice of hearing upon the ODC and the respondent, identifying the members of the Board assigned to the matter, and the date and place of the hearing. **The notice shall be given at least 20 days in advance of the date of the hearing**. The notice of hearing shall state that the respondent is entitled to be represented by a lawyer at the respondent's expense, to cross-examine witnesses, and to present evidence.

Del. Law. R. of Disciplinary Proc. Rule 10

Rule 10. Immunity.

All communications to and from the Board, PRC, or the ODC relating to lawyer misconduct or disability, and all testimony given in related proceedings, shall be absolutely privileged, and no civil suit predicated on those proceedings may be instituted against any complainant, witness or lawyer. Members of the Board, members of the PRC, members of the ODC and its agents and staff; Special Disciplinary Counsel and his or her agents and staff; the Administrative Assistant and staff; and receivers and their agents and staff shall be immune from civil suit for any conduct in the discharge of their official duties. (Amended, effective July 15, 2008.)

Del. Law. R. of Disciplinary Proc. Rule 12 (h)

"Exchange of information. The ODC and the respondent shall

exchange names of witnesses and copies of documents to be used by each side in its case in chief 10 business days prior to any hearing, and may supplement those lists thereafter with the approval of the opposing party or the chair of the Hearing Panel. Recorded statements, if any, of all witnesses so designated shall be exchanged at the same time. The exchange may take place by first-class mail to the respondent's last known address. The Hearing Panel may exclude any evidence offered by a party who fails to comply with this Rule."

Delaware Rules of Disciplinary Procedure, Rule 13 requires:

a) Confidentiality. Prior to the Hearing Panel's submission to the Court of its final report, and except as otherwise described in these rules, disciplinary and disability proceedings and the official record in such matters are confidential. If the Hearing Panel's report recommends that the matter be dismissed, that a lawyer not be transferred to disability inactive status, or that a private sanction be imposed, any further proceedings by the Court and the official record in the matter are confidential unless and until otherwise ordered by the Court. (b) Protective orders. Upon proper application with good cause shown, or on a sua sponte basis, the Chair or Vice Chair of the Board, the Chair of the Hearing Panel, or the Court may issue appropriate protective orders with respect to any proceedings, reports, documents, or other information which may otherwise be made public, for the purpose of preserving confidentiality. (c) Complainant's right to appear. The complainant in a disciplinary matter, if any, shall have the right to appear at any Board hearing on sanctions or any Court hearing on a petition for interim suspension relating to the matter for the sole purpose of making a statement on the record regarding the matter. (d) Requests for confidential information. A request for the release of confidential information as described under these Rules shall be made by written application, with good cause shown, directed to the Administrative Assistant. Such application shall be considered and determined by the Court. (e) Release of confidential information. The work product of the ODC may not be disclosed or released except pursuant to Rule 13(f). The pendency, subject matter, or status of a disciplinary matter may be disclosed or released if: (1) the respondent has waived confidentiality in writing; (2) the proceeding is based upon allegations which include the conviction of any crime; (3) the respondent has been placed upon interim suspension or disability inactive status; (4) such disclosure or release is necessary to obtain the assistance of another person, agency, or organization, provided that such person, agency, or organization agrees to maintain the confidentiality mandated by these Rules; (5) the proceedings are based upon allegations which have otherwise been made public; or (6) with the approval of the Court, such disclosure or release is necessary in order to correct false or misleading public statements with respect to any otherwise confidential proceeding or information, or is necessary to prevent public confidence in the disciplinary system from being undermined. (f) Cooperation with criminal justice authorities. Any evidence or information obtained through the disciplinary process indicating criminal conduct by a lawyer, including documents, transcripts, and work product, or any selected portions thereof, may be disclosed or turned over to the appropriate criminal justice authorities for their independent review and investigation. (g) Duty of participants. All participants in a

proceeding under these Rules shall conduct themselves so as to maintain the confidentiality mandated by these Rules. (Amended, effective May 14, 2008.)

Delaware Rules of Disciplinary procedure Rule 14 provides:

"The ODC shall publicly disseminate all information relating to disciplinary matters and proceedings as is consistent with these Rules. In particular, the ODC shall transmit notices and information regarding the imposition of all public discipline, transfers to or from disability inactive status, or reinstatements to:
(a) the disciplinary enforcement agency in any jurisdiction in which the respondent is admitted,
(b) the chief judicial officers of all courts of this State,
(c) the chief judicial officers of all federal courts located in this State, the United States Court of Appeals for the Third Circuit, and the United States Supreme Court,
(d) any national data bank maintained for the purposes of reporting disciplinary action relating to lawyers, and
(e) the news media."

Del. Law. R. of Disciplinary Proc. Rule 18

(a) Duty of disciplinary counsel to obtain order of discipline or disability inactive status from other jurisdiction. Upon being disciplined or transferred to disability inactive status in another jurisdiction, a lawyer admitted to practice in Delaware shall promptly inform ODC of the discipline or transfer. Upon notification from any source that a lawyer within the Court's jurisdiction has been disciplined or transferred to disability inactive status in another jurisdiction, ODC shall obtain a certified copy of the disciplinary order and file it with the Board and with the Court.

(b) Notice served upon respondent. Upon receipt of a certified copy of an order demonstrating that a lawyer admitted to practice in Delaware has been disciplined or transferred to disability inactive status in another jurisdiction, the Chair or Vice Chair of the Board shall forthwith issue a notice directed to the lawyer or to counsel containing: (1) a copy of the order from the other jurisdiction; and (2) an order directing that the lawyer or lawyer's counsel inform the Board and the Court, within 30 days from service of the notice, of any claim by the lawyer or lawyer'[s] counsel predicated upon the grounds set forth in paragraph (d), that the imposition of the identical discipline or disability inactive status in this State would be unwarranted and the reasons therefor.

(c) Effect of stay of discipline or transfer in other jurisdiction. In the event the discipline imposed or transfer in the other jurisdiction has been stayed there, any reciprocal discipline imposed or transfer in this State may be deferred until the stay expires.

(d) Discipline to be imposed or transfer to disability inactive status. Upon the expiration of 30 days from the service of the notice pursuant to the provisions of paragraph (b), the Board shall recommend to the Court that it shall impose the identical discipline or disability inactive status unless counsel or the lawyer demonstrates, or the Court finds that upon the face of the record on which the discipline is predicated it clearly appears that: (1) the procedure was so lacking in notice or opportunity to be heard as to constitute a deprivation of due process; (2) there was such

infirmity of proof establishing the misconduct as to give rise to the clear conviction that the Court could not, consistent with its duty, accept as final the conclusion on that subject; (3) the imposition of the same discipline by the Court would result in grave injustice; or (4) the misconduct established warrants substantially different discipline or no discipline in this State; or (5) the reason for the original transfer to disability inactive status no longer exists. If the Court determines that any of those elements exists, the Court shall enter such other order as it deems appropriate.

(e) Conclusiveness of adjudication in other jurisdiction. In all other aspects, a final adjudication in another jurisdiction that a lawyer has been guilty of misconduct shall establish conclusively the misconduct for purposes of a disciplinary proceeding in this State.

Del. Law. R. of Disciplinary Proc. Rule 19 (a)

"(a) Involuntary upon the lawyer, the lawyer's guardian, and/or the director of the institution to which the lawyer has been committed in the manner the Court may direct**.**

Del. Law. R. of Disciplinary Proc. Rule 19 (c)

(c) Proceedings to determine incapacity. Information relating to a lawyer's physical or mental condition which adversely affects the lawyer's ability to practice law shall be investigated by the ODC. If there are reasonable grounds to believe the interests of respondent's clients or the public are endangered, such information shall be the subject of formal proceedings to determine whether the respondent shall be transferred to disability inactive status. The procedures and hearings shall be conducted in the same manner as disciplinary proceedings. The Board may take or direct whatever action it deems necessary or proper to determine whether the respondent is so incapacitated, including the examination of the respondent by qualified medical experts at the respondent's expense. If, after reviewing the recommendation of the Board and upon due consideration of the matter, the Court concludes that the respondent is incapacitated from continuing to practice law, it shall enter an order transferring the respondent to disability inactive status for an indefinite period and until further order of the Court. Any pending disciplinary proceedings against the respondent shall be held in abeyance. The Board shall provide for such notice to the respondent of proceedings in the matter as it deems proper and advisable. If the respondent is not represented by counsel, the Court shall appoint counsel for the respondent.

Del. Law. R. of Disciplinary Proc. Rule 19 (d)

(d) Public notice of transfer to disability inactive status. The ODC may publicize any transfer to disability inactive status in the same manner as for the final imposition of public discipline.

Del. Law. R. of Disciplinary Proc. Rule 19 (e)

> (e) Reinstatement from disability inactive status. No respondent transferred to disability inactive status may resume active status except by order of the Court. Any respondent transferred to disability inactive status shall be entitled to petition the Court for transfer to active status once a year, or at whatever shorter intervals the Court may direct in the order transferring the respondent to disability inactive status or any modification thereof. The petition may be granted by the Court upon a showing by clear and convincing evidence that the disability has been removed.
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> Upon the filing of a petition for transfer to active status, the Court may take or direct whatever action it deems necessary or proper, including a remand to the Board for hearing and recommendation, to determine whether the disability has been removed, and may order an examination of the respondent by qualified medical experts. In its discretion, the Court may direct that the expense of the examination be paid by the respondent. The Court may also direct that the respondent establish proof of competence and learning in law, which proof may include certification by the Board of Bar Examiners of the respondent's successful completion of an examination for admission to practice.
>
> If a respondent transferred to disability inactive status on the basis of a judicial determination of incompetence has been judicially declared to be competent, the Court may dispense with further evidence that the disability has been removed and may immediately direct reinstatement to active status upon terms as are deemed proper and advisable."

Statutes

28 U.S. Code § 144

> Whenever a party to any proceeding in a district court makes and files a timely and sufficient affidavit that the judge before whom the matter is pending has a personal bias or prejudice either against him or in favor of any adverse party, such judge shall proceed no further therein, but another judge shall be assigned to hear such proceeding.
> The affidavit shall state the facts and the reasons for the belief that bias or prejudice exists, and shall be filed not less than ten days before the beginning of the term at which the proceeding is to be heard, or good cause shall be shown for failure to file it within such time. A party may file only one such affidavit in any case. It shall be accompanied by a certificate of counsel of record stating that it is made in good faith.

28 U.S. Code § 455

(a) Any justice, judge, or magistrate judge of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.

(b) He shall also disqualify himself in the following circumstances:

(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;

(2) Where in private practice he served as lawyer in the matter in controversy, or a lawyer with whom he previously practiced law served during such association as a lawyer concerning the matter, or the judge or such lawyer has been a material witness concerning it;

(3) Where he has served in governmental employment and in such capacity participated as counsel, adviser or material witness concerning the proceeding or expressed an opinion concerning the merits of the particular case in controversy;

(4) He knows that he, individually or as a fiduciary, or his spouse or minor child residing in his household, has a financial interest in the subject matter in controversy or in a party to the proceeding, or any other interest that could be substantially affected by the outcome of the proceeding;

(5) He or his spouse, or a person within the third degree of relationship to either of them, or the spouse of such a person:

(i) Is a party to the proceeding, or an officer, director, or trustee of a party;

(ii) Is acting as a lawyer in the proceeding;

(iii) Is known by the judge to have an interest that could be substantially affected by the outcome of the proceeding;

(iv) Is to the judge's knowledge likely to be a material witness in the proceeding.

(c) A judge should inform himself about his personal and fiduciary financial interests, and make a reasonable effort to inform himself about the personal financial interests of his spouse and minor children residing in his household.

(d) For the purposes of this section the following words or phrases shall have the meaning indicated:

(1) "proceeding" includes pretrial, trial, appellate review, or other stages of litigation;

(2) the degree of relationship is calculated according to the civil law system;

(3) "fiduciary" includes such relationships as executor, administrator, trustee, and guardian;

(4) “financial interest” means ownership of a legal or equitable interest, however small, or a relationship as director, adviser, or other active participant in the affairs of a party, except that:

(i) Ownership in a mutual or common investment fund that holds securities is not a “financial interest” in such securities unless the judge participates in the management of the fund;

(ii) An office in an educational, religious, charitable, fraternal, or civic organization is not a “financial interest” in securities held by the organization;

(iii) The proprietary interest of a policyholder in a mutual insurance company, of a depositor in a mutual savings association, or a similar proprietary interest, is a “financial interest” in the organization only if the outcome of the proceeding could substantially affect the value of the interest;

(iv) Ownership of government securities is a “financial interest” in the issuer only if the outcome of the proceeding could substantially affect the value of the securities.

(e) No justice, judge, or magistrate judge shall accept from the parties to the proceeding a waiver of any ground for disqualification enumerated in subsection (b). Where the ground for disqualification arises only under subsection (a), waiver may be accepted provided it is preceded by a full disclosure on the record of the basis for disqualification.

(f) Notwithstanding the preceding provisions of this section, if any justice, judge, magistrate judge, or bankruptcy judge to whom a matter has been assigned would be disqualified, after substantial judicial time has been devoted to the matter, because of the appearance or discovery, after the matter was assigned to him or her, that he or she individually or as a fiduciary, or his or her spouse or minor child residing in his or her household, has a financial interest in a party (other than an interest that could be substantially affected by the outcome), disqualification is not required if the justice, judge, magistrate judge, bankruptcy judge, spouse or minor child, as the case may be, divests himself or herself of the interest that provides the grounds for the disqualification.

29 CFR § 2200.68

§ 2200.68 Recusal of the Judge.

(a) Discretionary recusal. A Judge may recuse themself from a proceeding whenever the Judge deems it appropriate.

(b) Mandatory recusal. A Judge shall recuse themself under circumstances that would require disqualification of a Federal judge under Canon 3(C) of the Code of Conduct for United States Judges, except that the required recusal may be set aside under the conditions specified by Canon 3(D).

(c) Request for recusal. Any party may request that the Judge, at any time following the Judge's designation and before the filing of a decision, be recused under paragraph (a) or

(b) of this section or both by filing with the Judge, promptly upon the discovery of the alleged facts, an affidavit setting forth in detail the matters alleged to constitute grounds for recusal.

(d) Ruling on request. If the Judge finds that a request for recusal has been filed with due diligence and that the material filed in support of the request establishes that recusal either is appropriate under paragraph (a) of this section or is required under paragraph (b) of this section, the Judge shall recuse themself from the proceeding. If the Judge denies a request for recusal, the Judge shall issue a ruling on the record, stating the grounds for denying the request, and shall proceed with the hearing, or, if the hearing has closed, proceed with the issuance of a decision under the provisions of § 2200.90.

***U.S. Cons. Amend.* 1**

"Congress shall make no law respecting an **establishment of religion**, or **prohibiting the free exercise thereof; or abridging the freedom of speech, … or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances**."

U.S. Const. amend. V

No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be **subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himsel**f, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

U.S. Const. Amend. VI

"In all criminal prosecutions, the accused shall enjoy the right to a … **public trial**, by an **impartial jury of the State** and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to **be informed of the nature and cause of the accusation**; to be confronted with the witnesses against him; to have **compulsory process for obtaining witnesses in his favor**, and to have the Assistance of Counsel for his defense."

US Cons. Amend. XIII

"Section 1.

Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.

Section 2.
Congress shall have power to enforce this article by appropriate legislation."

U.S. Const. Amend. XIV § 1, Due Process and the Equal protection component

SECTION. 1. All persons born or naturalized in the United States and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

RULES

Supreme Court Rule 23
Rule 23. Stays

"1. A stay may be granted by a Justice as permitted by law.
2. A party to a judgment sought to be reviewed may present to a Justice an application to stay the enforcement of that judgment. See 28 U. S. C. § 2101(f).
3. An application for a stay shall set out with particularity why the relief sought is not available from any other court or judge. **Except in the most extraordinary circumstances**, an application for a stay will not be entertained unless the relief requested was frst sought in the appropriate court or courts below or from a judge or judges thereof. An application for a stay shall identify the judgment sought to be reviewed and have appended thereto a copy of the order and opinion, if any, and a copy of the order, if any, of the court or judge below denying the relief sought, and shall set out specifc reasons why a stay is justifed. The form and content of an application for a stay are governed by Rules 22 and 33.2.
4. A judge, court, or Justice granting an application for a stay pending review by this Court may condition the stay on the fling of a supersedeas bond having an approved surety or sureties. The bond will be conditioned on the satisfaction of the judgment in full, together with any costs, interest, and damages for delay that may be awarded. If a part of the judgment sought to be reviewed has already been satisfed, or is otherwise secured, the bond may be conditioned on the

satisfaction of the part of the judgment not otherwise secured or satisfed, together with costs, interest, and damages."

STATUTES

28 U.S.C. § 1254 (1)

"(1) By writ of certiorari granted upon the petition of any party to any civil or criminal case, before or after rendition of judgment or decree."

28 U. S. C. § 2101(e)

(e) An application to the Supreme Court for a writ of certiorari to review a case before judgment has been rendered in the court of appeals may be made at any time before judgment.

42 U.S.C. § 1983

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

42 U.S.C. § 1985 (2) Intimidating a party (2) Obstructing justice; intimidating party, witness, or juror

"If two or more persons in any State or Territory conspire to deter, by force, intimidation, or threat, any party or witness in any court of the United States from attending such court, or from testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party or witness in his person or property on account of his having so attended or testified, or to influence the verdict, presentment, or indictment of any grand or petit juror in any such court, or to injure such juror in his person or property on account of any verdict, presentment, or indictment lawfully assented to by him, or of his being or having been such juror; or if two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws"

42 U.S.C. § 1985 (3) Depriving persons of rights or privileges

"If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or if two or more persons conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the United States; or to injure any citizen in person or property on account of such support or advocacy; in any case of conspiracy set forth in this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators."

42 U.S.C. § 1988

(a) Applicability of statutory and common law

The jurisdiction in civil and criminal matters conferred on the district courts by the provisions of titles 13, 24, and 70 of the Revised Statutes for the protection of all persons in the United States in their civil rights, and for their vindication, shall be exercised and enforced in conformity with the laws of the United States, so far as such laws are suitable to carry the same into effect; but in all cases where they are not adapted to the object, or are deficient in the provisions necessary to furnish suitable remedies and punish offenses against law, the common law, as modified and changed by the constitution and statutes of the State wherein the court having jurisdiction of such civil or criminal cause is held, so far as the same is not inconsistent with the Constitution and laws of the United States, shall be extended to and govern the said courts in the trial and disposition of the cause, and, if it is of a criminal nature, in the infliction of punishment on the party found guilty.

(b) Attorney's fees

In any action or proceeding to enforce a provision of sections 1981, 1981a, 1982, 1983, 1985, and 1986 of this title, title IX of Public Law 92-318 [20 U.S.C. 1681 et seq.], the Religious Freedom Restoration Act of 1993 [42 U.S.C. 2000bb et seq.], the Religious Land Use and Institutionalized Persons Act of 2000 [42 U.S.C. 2000cc et seq.], title VI of the Civil Rights Act of 1964 [42 U.S.C. 2000d et seq.], or section 12361 of title 34, the court, in its discretion, may allow the prevailing party, other than the United States, a reasonable attorney's fee as part of the costs, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity such officer

shall not be held liable for any costs, including attorney's fees, unless such action was clearly in excess of such officer's jurisdiction.

(c) Expert fees

In awarding an attorney's fee under subsection (b) in any action or proceeding to enforce a provision of section 1981 or 1981a of this title, the court, in its discretion, may include expert fees as part of the attorney's fee.

28 U.S.C. § 2106

The Supreme Court or any other court of appellate jurisdiction may affirm, modify, vacate, set aside or reverse any judgment, decree, or order of a court lawfully brought before it for review, and may remand the cause and direct the entry of such appropriate judgment, decree, or order, or require such further proceedings to be had as may be just under the circumstances.

STATUTES Relating to my law suit against former President Donald J. Trump, the admitted reason for the petition to place my license on my active license to practice law on inactive/disability

42 USCS § 2000bb

"(a) Findings. The Congress finds that—

(1) the framers of the Constitution, recognizing free exercise of religion as an unalienable right, secured its protection in the First Amendment to the Constitution;

(2) laws "neutral" toward religion may burden religious exercise as surely as laws intended to interfere with religious exercise;

(3) governments should not substantially burden religious exercise without compelling justification;

(4) in Employment Division v. Smith, 494 U.S. 872 (1990) the Supreme Court virtually eliminated the requirement that the government justify burdens on religious exercise imposed by laws neutral toward religion; and

(5) the compelling interest test as set forth in prior Federal court rulings is a workable test for striking sensible balances between religious liberty and competing prior governmental interests.

(b) Purposes. The purposes of this Act are—

(1) to restore the compelling interest test as set forth in Sherbert v. Verner, 374 U.S. 398 (1963) and Wisconsin v. Yoder, 406 U.S. 205 (1972) and to guarantee its application in all cases where free exercise of religion is substantially burdened; and

(2) to provide a claim or defense to persons whose religious exercise is substantially burdened by government."

42 USCS § 2000bb-1,

"(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.

(c) Judicial relief. A person whose religious exercise has been burdened in violation of this section may assert that violation as a claim or defense in a judicial proceeding and obtain appropriate relief against a government. Standing to assert a claim or defense under this section shall be governed by the general rules of standing under article III of the Constitution."

42 USCS § 2000bb-2,

"As used in this Act—

(1) the term "government" includes a branch, department, agency, instrumentality, and official (or other person acting under color of law) of the United States, or of a covered entity;

(2) the term "covered entity" means the District of Columbia, the Commonwealth of Puerto Rico, and each territory and possession of the United States;

(3) the term "demonstrates" means meets the burdens of going forward with the evidence and of persuasion; and

(4) the term "exercise of religion" means religious exercise, as defined in section 8 of the Religious Land Use and Institutionalized Persons Act of 2000 [*42 USCS § 2000cc-5*]."

42 USCS § 2000bb-3,

"(a) In general. This Act applies to all Federal law, and the implementation of that law, whether statutory or otherwise, and whether adopted before or after the enactment of this Act [enacted Nov. 16, 1993].

(b) Rule of construction. Federal statutory law adopted after the date of the enactment of this Act [enacted Nov. 16, 1993] is subject to this Act unless such law explicitly excludes such application by reference to this Act.

(c) Religious belief unaffected. Nothing in this Act shall be construed to authorize any government to burden any religious belief."

42 USCS § 2000bb-4

"Nothing in this Act shall be construed to affect, interpret, or in any way address that portion of the First Amendment prohibiting laws respecting the establishment of religion (referred to in this section as the "Establishment Clause"). Granting government funding, benefits, or exemptions, to the extent permissible under the Establishment Clause, shall not constitute a violation of this Act. As used in this section, the term "granting", used with respect to government funding, benefits, or exemptions, does not include the denial of government funding, benefits, or exemptions."

Executive Orders relating to the law suit Kelly v Trump

Executive Orders by President Biden

Ex. Or. 14015, 86 Fed. Reg 10007, Feb. 14, 2021:

"Exec. Order No. 14015, 86 FR 10007, 2021 WL 616701(Pres.)
Executive Order 14015

Establishment of the White House Office of Faith-Based and Neighborhood Partnerships

February 14, 2021

"By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to better serve people in need through partnerships with civil society, while preserving our fundamental constitutional commitments, it is hereby ordered:

Section 1. Policy. Faith-based and other community-serving organizations are vital to our Nation's ability to address the needs of, and lift up, low-income and other underserved persons and communities, notably including persons of color. The American people are key drivers of fundamental change in our country, and few institutions are closer to the people than our faith-based and other community organizations. It is important that the Federal Government strengthen the ability of such organizations and other nonprofit providers in our communities to deliver services effectively in partnership with Federal, State, and local governments and with other private organizations, while preserving our fundamental constitutional commitments guaranteeing the equal protection of the laws and the free exercise of religion and forbidding the establishment of religion. The Federal Government can preserve these fundamental commitments while empowering faith-based and secular organizations to assist in the delivery of vital services in our neighborhoods. These partnerships are also vital for the success and effectiveness of the United States' diplomatic, international development, and humanitarian work around the world.

Sec. 2. Establishment. There is established a White House Office of Faith-Based and

Neighborhood Partnerships (White House Partnerships Office) within the Executive Office of the President, supported by the Domestic Policy Council and the Office of Public Engagement, that will have lead responsibility in the executive branch for establishing policies, priorities, and objectives for the Federal Government's comprehensive effort to enlist, equip, enable, empower, and expand the work of community-serving organizations, both faith-based and secular, to the extent permitted by law.

Sec. 3. Functions. The principal functions of the White House Partnerships Office are, to the extent permitted by law:
(a) to assist in organizing more effective efforts to serve people in need across the country and around the world, in partnership with civil society, including faith-based and secular organizations;
(b) to develop, lead, and coordinate the Administration's policy agenda affecting faith-based and other community programs and initiatives and to optimize the role of such efforts in communities;
(c) to ensure that policy decisions and programs throughout the Federal Government are consistent with the policy set forth in section 1 of this order with respect to faith-based and other community initiatives;
(d) to bring concerns, ideas, and policy options to Administration leadership for assisting, strengthening, and replicating partnerships, whether financial or nonfinancial, with faith-based and other community organizations; and
(e) to promote awareness among diverse civil society leaders of opportunities to partner both financially and otherwise with the Federal Government to serve people in need and to build institutional capacity.
Sec. 4. Administration. (a) The White House Partnerships Office may make use of established or ad hoc committees, task forces, or interagency groups.
(b) The White House Partnerships Office shall be led by an Executive Director and a Deputy Director. The operations of the White House Partnerships Office shall begin within 30 days of the date of this order.
(c) The White House Partnerships Office shall coordinate with the liaison and point of contact designated by each executive department and agency (agency) with respect to this initiative.
(d) All agencies shall cooperate with the White House Partnerships Office and provide such information, support, and assistance to the White House Partnerships Office as it may request, to the extent permitted by law.

(e) In order to ensure that Federal programs and practices involving grants or contracts to faith-based organizations are consistent with applicable law, the Executive Director of the White House Partnerships Office, acting through the Counsel to the President, may seek the opinion of the Attorney General on any constitutional and statutory questions involving existing or prospective programs and practices.

Sec. 5. Amendments to Executive Orders. (a) Executive Order 13198 of January 29, 2001 (Agency Responsibilities With Respect to Faith-Based and Community Initiatives); Executive Order 13279 of December 12, 2002 (Equal Protection of the Laws for Faith-Based and Community Organizations), as amended by Executive Order 13559 of

November 17, 2010 (Fundamental Principles and Policymaking Criteria for Partnerships With Faith-Based and Other Neighborhood Organizations); Executive Order 13280 of December 12, 2002 (Responsibilities of the Department of Agriculture and the Agency for International Development With Respect to Faith-Based and Community Initiatives); Executive Order 13342 of June 1, 2004 (Responsibilities of the Departments of Commerce and Veterans Affairs and the Small Business Administration With Respect to Faith-Based and Community Initiatives); and Executive Order 13397 of March 7, 2006 (Responsibilities of the Department of Homeland Security With Respect to Faith-Based and Community Initiatives), are amended by:

(i) substituting "White House Office of Faith-Based and Neighborhood Partnerships" for "White House Office of Faith-Based and Community Initiatives" and "White House Faith and Opportunity Initiative" each time they appear in those orders;

(ii) substituting "White House Office of Faith-Based and Neighborhood Partnerships" for "White House OFBCI" each time it appears in those orders;

(iii) substituting "Centers for Faith-Based and Neighborhood Partnerships" for "Centers for Faith-Based and Community Initiatives" and "Centers for Faith and Opportunity Initiatives" each time they appear in those orders; and

(iv) substituting "Center for Faith-Based and Neighborhood Partnerships" for "Center for Faith-Based and Community Initiatives" and "Center for Faith and Opportunity Initiatives" each time they appear in those orders.

(b) Executive Order 13397, as amended, is further amended by substituting, in section 1(b), "the Executive Director of the White House Office of Faith-Based and Neighborhood Partnerships (Executive Director)" for "the Director of the White House Office of Faith-Based and Community Initiatives (WHOFBCI Director)" and by substituting "Executive Director" for "WHOFBCI Director" each time it appears in the order.

Sec. 6. Revocation. Executive Order 13831 of May 3, 2018 (Establishment of a White House Faith and Opportunity Initiative), is revoked.

Sec. 7. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or

procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

THE WHITE HOUSE, February 14, 2021.

Exec. Order No. 1401586 FR 100072021 WL 616701(Pres.)"

Executive Orders by President Trump

Ex. Or. No. 13798, 82 Fed. Reg. 21675, May 4, 2017

"By the authority vested in me as President by the Constitution and the laws of the United States of America, in order to guide the executive branch in formulating and implementing policies with implications for the religious liberty of persons and organizations in America, and to further compliance with the Constitution and with applicable statutes and Presidential Directives, it is hereby ordered as follows:

Section 1. *Policy.* It shall be the policy of the executive branch to vigorously enforce Federal law's robust protections for religious freedom. The Founders envisioned a Nation in which religious voices and views were integral to a vibrant public square, and in which religious people and institutions were free to practice their faith without fear of discrimination or retaliation by the Federal Government. For that reason, the United States Constitution enshrines and protects the fundamental right to religious liberty as Americans' first freedom. Federal law protects the freedom of Americans and their organizations to exercise religion and participate fully in civic life without undue interference by the Federal Government. The executive branch will honor and enforce those protections.

Sec. 2. *Respecting Religious and Political Speech.* All executive departments and agencies (agencies) shall, to the greatest extent practicable and to the extent permitted by law, respect and protect the freedom of persons and organizations to engage in religious and political speech. In particular, the Secretary of the Treasury shall ensure, to the extent permitted by law, that the Department of the Treasury does not take any adverse action against any individual, house of worship, or other religious organization on the basis that such individual or organization speaks or has spoken about moral or political issues from a religious perspective, where speech of similar character has, consistent with law, not ordinarily been treated as participation or intervention in a political campaign on behalf of (or in opposition to) a candidate for public office by the Department of the Treasury. As used in this section, the term "adverse action" means the imposition of any tax or tax penalty; the delay or denial of tax-exempt status; the disallowance of tax deductions for contributions made to entities exempted from taxation under section 501(c)(3) of title 26, United States Code; or any other action that makes unavailable or denies any tax deduction, exemption, credit, or benefit.

Sec. 3. *Conscience Protections with Respect to Preventive-Care Mandate.* The Secretary of the Treasury, the Secretary of Labor, and the Secretary of Health and Human Services

shall consider issuing amended regulations, consistent with applicable law, to address conscience-based objections to the preventive-care mandate promulgated under section 300gg-13(a)(4) of title 42, United States Code.

Sec. 4. *Religious Liberty Guidance.* In order to guide all agencies in complying with relevant Federal law, the Attorney General shall, as appropriate, issue guidance interpreting religious liberty protections in Federal law.

Sec. 5. *Severability.* If any provision of this order, or the application of any provision to any individual or circumstance, is held to be invalid, the remainder of this order and the application of its other provisions to any other individuals or circumstances shall not be affected thereby.

Sec. 6. *General Provisions.* (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

/S/ Donald J. Trump

THE WHITE HOUSE,

May 4, 2017.

[FR Doc. 2017-09574 Filed 5-8-17; 11:15 am]

Billing code 3295-F7-P"

Ex Or. No. 13831, 83 Fed. Reg. 20715, May 3, 2018

"Exec. Order No. 13831, 83 FR 20715, 2018 WL 2100010(Pres.)
Executive Order 13831

Establishment of a White House Faith and Opportunity Initiative

May 3, 2018

By the authority vested in me as President by the Constitution and the laws of the United States of America, and to assist faith-based and other organizations in their efforts to

strengthen the institutions of civil society and American families and communities, it is hereby ordered as follows:

Section 1. Policy. Faith-based and community organizations have tremendous ability to serve individuals, families, and communities through means that are different from those of government and with capacity that often exceeds that of government. These organizations lift people up, keep families strong, and solve problems at the local level. The executive branch wants faith-based and community organizations, to the fullest opportunity permitted by law, to compete on a level playing field for grants, contracts, programs, and other Federal funding opportunities. The efforts of faith-based and community organizations are essential to revitalizing communities, and the Federal Government welcomes opportunities to partner with such organizations through innovative, measurable, and outcome-driven initiatives.

Sec. 2. Amendments to Executive Orders. (a) Executive Order 13198 of January 29, 2001 (Agency Responsibilities With Respect to Faith-Based and Community Initiatives), Executive Order 13279 of December 12, 2002 (Equal Protection of the Laws for Faith-Based and Community Organizations), as amended by Executive Order 13559 of November 17, 2010 (Fundamental Principles and Policymaking Criteria for Partnerships with Faith-Based and Other Neighborhood Organizations), Executive Order 13280 of December 12, 2002 (Responsibilities of the Department of Agriculture and the Agency for International Development With Respect to Faith-Based and Community Initiatives), Executive Order 13342 of June 1, 2004 (Responsibilities of the Departments of Commerce and Veterans Affairs and the Small Business Administration with Respect to Faith-Based and Community Initiatives), and Executive Order 13397 of March 7, 2006 (Responsibilities of the Department of Homeland Security With Respect to Faith-Based and Community Initiatives), are hereby amended by:

(i) substituting "White House Faith and Opportunity Initiative" for "White House Office of Faith-Based and Community Initiatives" each time it appears in those orders;

(ii) substituting "White House Faith and Opportunity Initiative" for "White House OFBCI" each time it appears in those orders;

(iii) substituting "Centers for Faith and Opportunity Initiatives" for "Centers for Faith-Based and Community Initiatives" each time it appears in those orders; and

(iv) substituting "White House Faith and Opportunity Initiative" for "Office of Faith-Based and Neighborhood Partnerships" each time it appears in those orders.
(b) Executive Order 13279, as amended, is further amended by striking section 2(h) and redesignating sections 2(i) and 2(j) as sections 2(h) and 2(i), respectively.

Sec. 3. White House Faith and Opportunity Initiative. (a) There is established within the Executive Office of the President the White House Faith and Opportunity Initiative (Initiative).

(i) The Initiative shall be headed by an Advisor to the White House Faith and Opportunity Initiative (Advisor). The Advisor shall be housed in the Office of Public Liaison and shall work with that office and the Domestic Policy Council, in consultation with the Centers for Faith-Based and Community Initiatives established by Executive Order 13198, Executive Order 13280, Executive Order 13342, and Executive Order 13397, to implement this order.

(ii) The Initiative shall, from time to time and consistent with applicable law, consult with and seek information from experts and various faith and community leaders from outside the Federal Government, including those from State, local, and tribal governments, identified by the Office of Public Liaison, the Domestic Policy Council, and the Centers for Faith and Opportunity Initiatives. These experts and leaders shall be identified based on their expertise in a broad range of areas in which faith-based and community organizations operate, including poverty alleviation, religious liberty, strengthening marriage and family, education, solutions for substance abuse and addiction, crime prevention and reduction, prisoner reentry, and health and humanitarian services.

(iii) The Advisor shall make recommendations to the President, through the Assistant to the President for Domestic Policy, regarding changes to policies, programs, and practices that affect the delivery of services by faith-based and community organizations.

(iv) Executive departments and agencies (agencies) that lack a Center for Faith and Opportunity Initiative shall designate a Liaison for Faith and Opportunity Initiatives as a point of contact to coordinate with the Advisor in carrying out this order.

(v) All agencies shall, to the extent permitted by law, provide such information, support, and assistance to the Initiative as it may request to develop public policy proposals.
(b) To the extent permitted by law, the Initiative shall:

(i) periodically convene meetings with the individuals described in section 3(a)(ii) of this order;
(ii) periodically convene meetings with representatives from the Centers for Faith and Opportunity Initiatives and other representatives from across agencies as the Advisor may designate;
(iii) provide recommendations regarding aspects of my Administration's policy agenda that affect faith-based and community programs and initiatives;
(iv) help integrate those aspects of my Administration's policy agenda that affect faith-based and other community organizations throughout the Federal Government;
(v) showcase innovative initiatives by faith-based and community organizations that serve and strengthen individuals, families, and communities throughout the United States;
(vi) notify the Attorney General, or his designee, of concerns raised by faith-based and community organizations about any failures of the executive branch to comply with protections of Federal law for religious liberty as outlined in the Attorney General's Memorandum of October 6, 2017 (Federal Law Protections for Religious Liberty), issued

pursuant to Executive Order 13798 of May 4, 2017 (Promoting Free Speech and Religious Liberty); and
(vii) identify and propose means to reduce, in accordance with Executive Order 13798 and the Attorney General's Memorandum of October 6, 2017, burdens on the exercise of religious convictions and legislative, regulatory, and other barriers to the full and active engagement of faith-based and community organizations in Government-funded or Government-conducted activities and programs.
Sec. 4. Revocation of Executive Orders. Executive Order 13199 of January 29, 2001 (Establishment of White House Office of Faith-Based and Community Initiatives), and Executive Order 13498 of February 5, 2009 (Amendments to Executive Order 13199 and Establishment of the President's Advisory Council for Faith-Based and Neighborhood Partnerships), are hereby revoked.
Sec. 5. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:
(i) the authority granted by law to an executive department or agency, or the head thereof; or
(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.
(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.
(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

THE WHITE HOUSE, May 3, 2018.

Exec. Order No. 1383183 FR 207152018 WL 2100010(Pres.)"

Executive Orders by President Obama

Ex. Or. No. 13559, 75 Fed. Reg. 71319, Nov. 17, 2010.

"Exec. Order No. 13559, 75 FR 71319, 2010 WL 4688680(Pres.)
Executive Order 13559

Fundamental Principles and Policymaking Criteria for Partnerships With Faith-Based and Other Neighborhood Organizations

November 17, 2010

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to guide Federal agencies in formulating and developing policies with implications for faith-based and other neighborhood organizations, to promote compliance with constitutional and other applicable legal principles, and to strengthen the capacity of faith-based and other neighborhood organizations to deliver services effectively to those in need, it is hereby ordered:

Section 1. Amendments to Executive Order 13279. Executive Order 13279 of December

12, 2002 (Equal Protection of the Laws for Faith-Based and Community Organizations), as amended, is hereby further amended:
(a) in section 1, by striking subsection (e), and inserting in lieu thereof the following:
"(e) 'Specified agency heads' means:
(i) the Attorney General;
(ii) the Secretary of Agriculture;
(iii) the Secretary of Commerce;
(iv) the Secretary of Labor;
(v) the Secretary of Health and Human Services;
(vi) the Secretary of Housing and Urban Development;
(vii) the Secretary of Education;
(viii) the Secretary of Veterans Affairs;
(ix) the Secretary of Homeland Security;
(x) the Administrator of the Environmental Protection Agency;
(xi) the Administrator of the Small Business Administration;
(xii) the Administrator of the United States Agency for International Development; and
(xiii) the Chief Executive Officer of the Corporation for National and Community Service.";
(b) by striking section 2, and inserting in lieu thereof the following:

"Sec. 2. Fundamental Principles. In formulating and implementing policies that have implications for faith-based and other neighborhood organizations, agencies that administer social service programs or that support (including through prime awards or sub-awards) social service programs with Federal financial assistance shall, to the extent permitted by law, be guided by the following fundamental principles:
(a) Federal financial assistance for social service programs should be distributed in the most effective and efficient manner possible.

(b) The Nation's social service capacity will benefit if all eligible organizations, including faith-based and other neighborhood organizations, are able to compete on an equal footing for Federal financial assistance used to support social service programs.

The President
(c) No organization should be discriminated against on the basis of religion or religious belief in the administration or distribution of Federal financial assistance under social service programs.

(d) All organizations that receive Federal financial assistance under social service programs should be prohibited from discriminating against beneficiaries or prospective beneficiaries of the social service programs on the basis of religion or religious belief. Accordingly, organizations, in providing services supported in whole or in part with Federal financial assistance, and in their outreach activities related to such services, should not be allowed to discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

(e) The Federal Government must implement Federal programs in accordance with the

Establishment Clause and the Free Exercise Clause of the First Amendment to the United States Constitution, as well as other applicable law, and must monitor and enforce standards regarding the relationship between religion and government in ways that avoid excessive entanglement between religious bodies and governmental entities.

(f) Organizations that engage in explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization) must perform such activities and offer such services outside of programs that are supported with direct Federal financial assistance (including through prime awards or sub-awards), separately in time or location from any such programs or services supported with direct Federal financial assistance, and participation in any such explicitly religious activities must be voluntary for the beneficiaries of the social service program supported with such Federal financial assistance.

(g) Faith-based organizations should be eligible to compete for Federal financial assistance used to support social service programs and to participate fully in the social service programs supported with Federal financial assistance without impairing their independence, autonomy, expression outside the programs in question, or religious character. Accordingly, a faith-based organization that applies for, or participates in, a social service program supported with Federal financial assistance may retain its independence and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct Federal financial assistance that it receives (including through a prime award or sub-award) to support or engage in any explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), or in any other manner prohibited by law. Among other things, faith-based organizations that receive Federal financial assistance may use their facilities to provide social services supported with Federal financial assistance, without removing or altering religious art, icons, scriptures, or other symbols from these facilities. In addition, a faith-based organization that applies for, or participates in, a social service program supported with Federal financial assistance may retain religious terms in its name, select its board members on a religious basis, and include religious references in its organization's mission statements and other chartering or governing documents.

(h) Each agency responsible for administering or awarding Federal financial assistance for social service programs shall offer protections for beneficiaries of such programs pursuant to the following principles:

(i) Referral to an Alternative Provider. If a beneficiary or prospective beneficiary of a social service program supported by Federal financial assistance objects to the religious character of an organization that provides services under the program, that organization shall, within a reasonable time after the date of the objection, refer the beneficiary to an alternative provider.

(ii) Agency Responsibilities. Each agency responsible for administering a social service

program or supporting a social service program with ***71321** Federal financial assistance shall establish policies and procedures designed to ensure that (1) appropriate and timely referrals are made to an alternative provider; (2) all referrals are made in a manner consistent with all applicable privacy laws and regulations; (3) the organization subject to subsection (h)(i) notifies the agency of any referral; (4) such organization has established a process for determining whether the beneficiary has contacted the alternative provider; and (5) each beneficiary of a social service program receives written notice of the protections set forth in this subsection prior to enrolling in or receiving services from such program.

(i) To promote transparency and accountability, agencies that provide Federal financial assistance for social service programs shall post online, in an easily accessible manner, regulations, guidance documents, and policies that reflect or elaborate upon the fundamental principles described in this section. Agencies shall also post online a list of entities that receive Federal financial assistance for provision of social service programs, consistent with law and pursuant to guidance set forth in paragraph (c) of section 3 of this order.

(j) Decisions about awards of Federal financial assistance must be free from political interference or even the appearance of such interference and must be made on the basis of merit, not on the basis of the religious affiliation of a recipient organization or lack thereof.";

(c) by striking section 3, and inserting in lieu thereof the following:

"Sec. 3. Ensuring Uniform Implementation Across the Federal Government.

In order to promote uniformity in agencies' policies that have implications for faith-based and other neighborhood organizations and in related guidance, and to ensure that those policies and guidance are consistent with the fundamental principles set forth in section 2 of this order, there is established an Interagency Working Group on Faith-Based and Other Neighborhood Partnerships (Working Group).

(a) Mission and Function of the Working Group. The Working Group shall meet periodically to review and evaluate existing agency regulations, guidance documents, and policies that have implications for faith-based and other neighborhood organizations. Where appropriate, specified agency heads shall, to the extent permitted by law, amend all such existing policies of their respective agencies to ensure that they are consistent with the fundamental principles set forth in section 2 of this order.

(b) Uniform Agency Implementation. Within 120 days of the date of this order, the Working Group shall submit a report to the President on amendments, changes, or additions that are necessary to ensure that regulations and guidance documents associated with the distribution of Federal financial assistance for social service programs are consistent with the fundamental principles set forth in section 2 of this order. The Working Group's report should include, but not be limited to, a model set of regulations and guidance documents for agencies to adopt in the following areas:

(i) prohibited uses of direct Federal financial assistance and separation requirements; (ii) protections for religious identity; (iii) the distinction between "direct" and "indirect" Federal financial assistance; (iv) protections for beneficiaries of social service programs; (v) transparency requirements, consistent with and in furtherance of existing open government initiatives; (vi) obligations of nongovernmental and governmental intermediaries; (vii) instructions for peer reviewers and those who recruit peer reviewers; and (viii) training on these matters for government employees and for Federal, State, and local governmental and nongovernmental organizations that receive Federal financial assistance under social service programs. In developing this report and in reviewing agency regulations and guidance for consistency with section 2 of this order, the Working Group shall consult the March 2010 report and recommendations prepared by the President's Advisory Council on Faith-Based and Neighborhood Partnerships on the topic of reforming the Office of Faith-Based and Neighborhood Partnerships.

(c) Guidance. The Director of the Office of Management and Budget (OMB), following receipt of a copy of the report of the Working Group, and in coordination with the Department of Justice, shall issue guidance to agencies on the implementation of this order, including in particular subsections 2(h)-(j).

(d) Membership of the Working Group. The Director of the Office of Faith-Based and Neighborhood Partnerships and a senior official from the OMB designated by the Director of the OMB shall serve as the Co-Chairs of the Working Group. The Co-Chairs shall convene regular meetings of the Working Group, determine its agenda, and direct its work. In addition to the Co-Chairs, the Working Group shall consist of a senior official with knowledge of policies that have implications for faith-based and other neighborhood organizations from the following agencies and offices:
(i) the Department of State;
(ii) the Department of Justice;
(iii) the Department of the Interior;
(iv) the Department of Agriculture;
(v) the Department of Commerce;
(vi) the Department of Labor;
(vii) the Department of Health and Human Services;
(viii) the Department of Housing and Urban Development;
(ix) the Department of Education;
(x) the Department of Veterans Affairs;
(xi) the Department of Homeland Security;
(xii) the Environmental Protection Agency;
(xiii) the Small Business Administration;
(xiv) the United States Agency for International Development;
(xv) the Corporation for National and Community Service; and
(xvi) other agencies and offices as the President, from time to time, may designate.
(e) Administration of the Initiative. The Department of Health and Human Services shall provide funding and administrative support for the Working Group to the extent permitted by law and within existing appropriations."; and

(d) by striking in the title, preamble, and section 1(c), "community" and inserting in lieu thereof "other neighborhood".

Sec. 2. General Provisions.
(a) This order amends the requirements contained in Executive Order 13279. This order supplements, but does not supersede, the requirements contained in Executive Orders 13198 and 13199 of January 29, 2001, and Executive Order 13498 of February 5, 2009.

(b) Nothing in this order shall be construed to impair or otherwise affect:
(i) authority granted by law to an executive department, agency, or the head thereof; or
(ii) functions of the Director of the OMB relating to budgetary, administrative, or legislative proposals.
(c) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.
(d) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

BARACK OBAMA

THE WHITE HOUSE ,November 17, 2010.

Exec. Order No. 1355975 FR 713192010 WL 4688680(Pres.)"

Executive Orders by President Bush, Junior

Ex. Or. No. 13198, 66 Fed. Reg. 8497, Jan. 29, 2001, as amended by Ex. Or. 14015, 86 Fed. Reg 10007, Feb. 14, 2021.

"66 FR 8497, Exec. Order No. 13198, 2001 WL 34773628(Pres.)
Executive Order 13198

Agency Responsibilities With Respect to Faith-Based and Community Initiatives

January 29, 2001

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to help the Federal Government coordinate a national effort to expand opportunities for faith-based and other community organizations and to strengthen their capacity to better meet social needs in America's communities, it is hereby ordered as follows:

Section 1. *Establishment of Executive Department Centers for Faith-Based and Community Initiatives.* (a) The Attorney General, the Secretary of Education, the Secretary of Labor, the Secretary of Health and Human Services, and the Secretary of Housing and Urban Development shall each establish within their respective departments a Center for Faith-Based and Community Initiatives (Center).
(b) Each executive department Center shall be supervised by a Director, appointed by the

department head in consultation with the White House Office of Faith-Based and Community Initiatives (White House OFBCI).

(c) Each department shall provide its Center with appropriate staff, administrative support, and other resources to meet its responsibilities under this order.

(d) Each department's Center shall begin operations no later than 45 days from the date of this order.

Sec. 2. *Purpose of Executive Department Centers for Faith-Based and Community Initiatives.* The purpose of the executive department Centers will be to coordinate department efforts to eliminate regulatory, contracting, and other programmatic obstacles to the participation of faith-based and other community organizations in the provision of social services.

Sec. 3. *Responsibilities of Executive Department Centers for Faith-Based and Community Initiatives.* Each Center shall, to the extent permitted by law: (a) conduct, in coordination with the White House OFBCI, a department-wide audit to identify all existing barriers to the participation of faith-based and other community organizations in the delivery of social services by the department, including but not limited to regulations, rules, orders, procurement, and other internal policies and practices, and outreach activities that either facially discriminate against or otherwise discourage or disadvantage the participation of faith-based and other community organizations in Federal programs;
(b) coordinate a comprehensive departmental effort to incorporate faith-based and other community organizations in department programs and initiatives to the greatest extent possible;

(c) propose initiatives to remove barriers identified pursuant to section 3(a) of this order, including but not limited to reform of regulations, procurement, and other internal policies and practices, and outreach activities;

(d) propose the development of innovative pilot and demonstration programs to increase the participation of faith-based and other community organizations in Federal as well as State and local initiatives; and

(e) develop and coordinate department outreach efforts to disseminate information more effectively to faith-based and other community organizations with respect to programming changes, contracting opportunities, and ***8498** other department initiatives, including but not limited to Web and Internet resources.

Sec. 4. *Additional Responsibilities of the Department of Health and Human Services and the Department of Labor Centers.* In addition to those responsibilities described in section 3 of this order, the Department of Health and Human Services and the Department of Labor Centers shall, to the extent permitted by law: (a) conduct a comprehensive review of

policies and practices affecting existing funding streams governed by so-called "Charitable Choice" legislation to assess the department's compliance with the requirements of Charitable Choice; and (b) promote and ensure compliance with existing Charitable Choice legislation by the department, as well as its partners in State and local government, and their contractors.

Sec. 5. *Reporting Requirements.* (a) Report. Not later than 180 days after the date of this order and annually thereafter, each of the five executive department Centers described in section 1 of this order shall prepare and submit a report to the White House OFBCI.
(b) Contents. The report shall include a description of the department's efforts in carrying out its responsibilities under this order, including but not limited to:
(1) a comprehensive analysis of the barriers to the full participation of faith-based and other community organizations in the delivery of social services identified pursuant to section 3(a) of this order and the proposed strategies to eliminate those barriers; and

(2) a summary of the technical assistance and other information that will be available to faith-based and other community organizations regarding the program activities of the department and the preparation of applications or proposals for grants, cooperative agreements, contracts, and procurement.

(c) Performance Indicators. The first report, filed 180 days after the date of this order, shall include annual performance indicators and measurable objectives for department action. Each report filed thereafter shall measure the department's performance against the objectives set forth in the initial report.

Sec. 6. *Responsibilities of All Executive Departments and Agencies.* All executive departments and agencies (agencies) shall: (a) designate an agency employee to serve as the liaison and point of contact with the White House OFBCI; and
(b) cooperate with the White House OFBCI and provide such information, support, and assistance to the White House OFBCI as it may request, to the extent permitted by law.

Sec. 7. *Administration and Judicial Review.* (a) The agencies' actions directed by this Executive Order shall be carried out subject to the availability of appropriations and to the extent permitted by law.
(b) This order does not create any right or benefit, substantive or procedural, enforceable at law or equity against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

GEORGE W. BUSH

THE WHITE HOUSE, January 29, 2001."

Ex. Or. No. 13199, 66 FR 8497, Jan. 29, 2001, as revoked by Ex. Or No. 13831, 83 FR 20715, May 3, 2018.

"66 FR 8499, Exec. Order No. 13199, 2001 WL 34773629(Pres.)
Executive Order 13199

Establishment of White House Office of Faith-Based and Community Initiatives

January 29, 2001

***8499** By the authority vested in me as President of the United States by the Constitution and the laws of the United States of America, and in order to help the Federal Government coordinate a national effort to expand opportunities for faith-based and other community organizations and to strengthen their capacity to better meet social needs in America's communities, it is hereby ordered as follows:

Section 1. *Policy.* Faith-based and other community organizations are indispensable in meeting the needs of poor Americans and distressed neighborhoods. Government cannot be replaced by such organizations, but it can and should welcome them as partners. The paramount goal is compassionate results, and private and charitable community groups, including religious ones, should have the fullest opportunity permitted by law to compete on a level playing field, so long as they achieve valid public purposes, such as curbing crime, conquering addiction, strengthening families and neighborhoods, and overcoming poverty. This delivery of social services must be results oriented and should value the bedrock principles of pluralism, nondiscrimination, evenhandedness, and neutrality.

Sec. 2. *Establishment.* There is established a White House Office of Faith-Based and Community Initiatives (White House OFBCI) within the Executive Office of the President that will have lead responsibility in the executive branch to establish policies, priorities, and objectives for the Federal Government's comprehensive effort to enlist, equip, enable, empower, and expand the work of faith-based and other community organizations to the extent permitted by law.

Sec. 3. *Functions.* The principal functions of the White House OFBCI are, to the extent permitted by law: (a) to develop, lead, and coordinate the Administration's policy agenda affecting faith-based and other community programs and initiatives, expand the role of such efforts in communities, and increase their capacity through executive action, legislation, Federal and private funding, and regulatory relief;
(b) to ensure that Administration and Federal Government policy decisions and programs are consistent with the President's stated goals with respect to faith-based and other community initiatives;

(c) to help integrate the President's policy agenda affecting faith-based and other community organizations across the Federal Government;

(d) to coordinate public education activities designed to mobilize public support for faith-

based and community nonprofit initiatives through volunteerism, special projects, demonstration pilots, and public-private partnerships;

(e) to encourage private charitable giving to support faith-based and community initiatives;

(f) to bring concerns, ideas, and policy options to the President for assisting, strengthening, and replicating successful faith-based and other community programs;

(g) to provide policy and legal education to State, local, and community policymakers and public officials seeking ways to empower faith-based and ***8500** other community organizations and to improve the opportunities, capacity, and expertise of such groups;

(h) to develop and implement strategic initiatives under the President's agenda to strengthen the institutions of civil society and America's families and communities;

(i) to showcase and herald innovative grassroots nonprofit organizations and civic initiatives;

(j) to eliminate unnecessary legislative, regulatory, and other bureaucratic barriers that impede effective faith-based and other community efforts to solve social problems;

(k) to monitor implementation of the President's agenda affecting faith-based and other community organizations; and

(l) to ensure that the efforts of faith-based and other community organizations meet high standards of excellence and accountability.

Sec. 4. *Administration.* (a) The White House OFBCI may function through established or ad hoc committees, task forces, or interagency groups.
(b) The White House OFBCI shall have a staff to be headed by the Assistant to the President for Faith-Based and Community Initiatives. The White House OFBCI shall have such staff and other assistance, to the extent permitted by law, as may be necessary to carry out the provisions of this order. The White House OFBCI operations shall begin no later than 30 days from the date of this order.

(c) The White House OFBCI shall coordinate with the liaison and point of contact designated by each executive department and agency with respect to this initiative.

(d) All executive departments and agencies (agencies) shall cooperate with the White House OFBCI and provide such information, support, and assistance to the White House OFBCI as it may request, to the extent permitted by law.

(e) The agencies' actions directed by this Executive Order shall be carried out subject to the availability of appropriations and to the extent permitted by law.

Sec. 5. *Judicial Review.* This order does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

GEORGE W. BUSH

THE WHITE HOUSE, January 29, 2001."

Ex. Or. No. 13279, 67 FR 77141, December 12, 2002, as amended by Exec. Or. No. 13559, 75 FR 71319, November 17, 2010.

67 FR 77141, Exec. Order No. 13279, 2002 WL 32817723(Pres.)
Executive Order 13279

Equal Protection of the Laws for Faith-Based and Community Organizations

December 12, 2002

***77141** By the authority vested in me as President by the Constitution and the laws of the United States of America, including section 121(a) of title 40, United States Code, and section 301 of title 3, United States Code, and in order to guide Federal agencies in formulating and developing policies with implications for faith-based organizations and other community organizations, to ensure equal protection of the laws for faith-based and community organizations, to further the national effort to expand opportunities for, and strengthen the capacity of, faith-based and other community organizations so that they may better meet social needs in America's communities, and to ensure the economical and efficient administration and completion of Government contracts, it is hereby ordered as follows:

Section 1. *Definitions*. For purposes of this order:

(a) "Federal financial assistance" means assistance that non-Federal entities receive or administer in the form of grants, contracts, loans, loan guarantees, property, cooperative agreements, food commodities, direct appropriations, or other assistance, but does not include a tax credit, deduction, or exemption.

(b) "Social service program" means a program that is administered by the Federal Government, or by a State or local government using Federal financial assistance, and that provides services directed at reducing poverty, improving opportunities for low-income children, revitalizing low-income communities, empowering low-income families and low-income individuals to become self-sufficient, or otherwise helping people in need. Such programs include, but are not limited to, the following:
(i) child care services, protective services for children and adults, services for children and adults in foster care, adoption services, services related to the management and maintenance of the home, day care services for adults, and services to meet the special needs of children, older individuals,

and individuals with disabilities (including physical, mental, or emotional disabilities);

(ii) transportation services;

(iii) job training and related services, and employment services;

(iv) information, referral, and counseling services;

(v) the preparation and delivery of meals and services related to soup kitchens or food banks;

(vi) health support services;

(vii) literacy and mentoring programs;

(viii) services for the prevention and treatment of juvenile delinquency and substance abuse, services for the prevention of crime and the provision of assistance to the victims and the families of criminal offenders, and services related to intervention in, and prevention of, domestic violence; and

(ix) services related to the provision of assistance for housing under Federal law.

(c) "Policies that have implications for faith-based and community organizations" refers to all policies, programs, and regulations, including official ***77142** guidance and internal agency procedures, that have significant effects on faith-based organizations participating in or seeking to participate in social service programs supported with Federal financial assistance.

(d) "Agency" means a department or agency in the executive branch.

(e) "Specified agency heads" mean the Attorney General, the Secretaries of Agriculture, Education, Health and Human Services, Housing and Urban Development, and Labor, and the Administrator of the Agency for International Development.

Sec. 2. *Fundamental Principles and Policymaking Criteria* .

In formulating and implementing policies that have implications for faith-based and community organizations, agencies that administer social service programs supported with Federal financial assistance shall, to the extent permitted by law, be guided by the following fundamental principles:
(a) Federal financial assistance for social service programs should be distributed in the most effective and efficient manner possible;

(b) The Nation's social service capacity will benefit if all eligible organizations, including faith-based and other community organizations, are able to compete on an equal footing for Federal financial assistance used to support social service programs;

(c) No organization should be discriminated against on the basis of religion or religious belief in

the administration or distribution of Federal financial assistance under social service programs;

(d) All organizations that receive Federal financial assistance under social services programs should be prohibited from discriminating against beneficiaries or potential beneficiaries of the social services programs on the basis of religion or religious belief. Accordingly, organizations, in providing services supported in whole or in part with Federal financial assistance, and in their outreach activities related to such services, should not be allowed to discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to actively participate in a religious practice;

(e) The Federal Government must implement Federal programs in accordance with the Establishment Clause and the Free Exercise Clause of the First Amendment to the Constitution. Therefore, organizations that engage in inherently religious activities, such as worship, religious instruction, and proselytization, must offer those services separately in time or location from any programs or services supported with direct Federal financial assistance, and participation in any such inherently religious activities must be voluntary for the beneficiaries of the social service program supported with such Federal financial assistance; and

(f) Consistent with the Free Exercise Clause and the Free Speech Clause of the Constitution, faith-based organizations should be eligible to compete for Federal financial assistance used to support social service programs and to participate fully in the social service programs supported with Federal financial assistance without impairing their independence, autonomy, expression, or religious character. Accordingly, a faith-based organization that applies for or participates in a social service program supported with Federal financial assistance may retain its independence and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct Federal financial assistance to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations that receive Federal financial assistance may use their facilities to provide social services supported with Federal financial assistance, without removing or altering religious art, icons, scriptures, or other symbols from these facilities. In addition, a faith-based organization that applies for or participates in a social service program supported with Federal financial assistance may retain religious terms in its organization's name, ***77143** select its board members on a religious basis, and include religious references in its organization's mission statements and other chartering or governing documents.

Sec. 3. *Agency Implementation*.

(a) Specified agency heads shall, in coordination with the White House Office of Faith-Based and Community Initiatives (White House OFBCI), review and evaluate existing policies that have implications for faith-based and community organizations in order to assess the consistency of such policies with the fundamental principles and policymaking criteria articulated in section 2 of this order.

(b) Specified agency heads shall ensure that all policies that have implications for faith-based and community organizations are consistent with the fundamental principles and policymaking criteria

articulated in section 2 of this order. Therefore, specified agency heads shall, to the extent permitted by law:
(i) amend all such existing policies of their respective agencies to ensure that they are consistent with the fundamental principles and policymaking criteria articulated in section 2 of this order;

(ii) where appropriate, implement new policies for their respective agencies that are consistent with and necessary to further the fundamental principles and policymaking criteria set forth in section 2 of this order; and

(iii) implement new policies that are necessary to ensure that their respective agencies collect data regarding the participation of faith-based and community organizations in social service programs that receive Federal financial assistance.

(c) Within 90 days after the date of this order, each specified agency head shall report to the President, through the Director of the White House OFBCI, the actions it proposes to undertake to accomplish the activities set forth in sections 3(a) and (b) of this order.

Sec. 4. *Amendment of Executive Order 11246.*

Pursuant to section 121(a) of title 40, United States Code, and section 301 of title 3, United States Code, and in order to further the strong Federal interest in ensuring that the cost and progress of Federal procurement contracts are not adversely affected by an artificial restriction of the labor pool caused by the unwarranted exclusion of faith-based organizations from such contracts, section 204 of Executive Order 11246 of September 24, 1965, as amended, is hereby further amended to read as follows:

"SEC. 204 (a) The Secretary of Labor may, when the Secretary deems that special circumstances in the national interest so require, exempt a contracting agency from the requirement of including any or all of the provisions of Section 202 of this Order in any specific contract, subcontract, or purchase order.

(b) The Secretary of Labor may, by rule or regulation, exempt certain classes of contracts, subcontracts, or purchase orders (1) whenever work is to be or has been performed outside the United States and no recruitment of workers within the limits of the United States is involved; (2) for standard commercial supplies or raw materials; (3) involving less than specified amounts of money or specified numbers of workers; or (4) to the extent that they involve subcontracts below a specified tier.

(c) Section 202 of this Order shall not apply to a Government contractor or subcontractor that is a religious corporation, association, educational institution, or society, with respect to the employment of individuals of a particular religion to perform work connected with the carrying on by such corporation, association, educational institution, or society of its activities. Such contractors and subcontractors are not exempted or excused from complying with the other requirements contained in this Order.

(d) The Secretary of Labor may also provide, by rule, regulation, or order, for the exemption of facilities of a contractor that are in all respects separate ***77144** and distinct from activities of the contractor related to the performance of the contract: provided, that such an exemption will not interfere with or impede the effectuation of the purposes of this Order: and provided further, that in the absence of such an exemption all facilities shall be covered by the provisions of this Order."

Sec. 5. *General Provisions*.

(a) This order supplements but does not supersede the requirements contained in Executive Orders 13198 and 13199 of January 29, 2001.

(b) The agencies shall coordinate with the White House OFBCI concerning the implementation of this order.

(c) Nothing in this order shall be construed to require an agency to take any action that would impair the conduct of foreign affairs or the national security.

Sec. 6. *Responsibilities of Executive Departments and Agencies*. All executive departments and agencies (agencies) shall:

(a) designate an agency employee to serve as the liaison and point of contact with the White House OFBCI; and

(b) cooperate with the White House OFBCI and provide such information, support, and assistance to the White House OFBCI as it may request, to the extent permitted by law.

Sec. 7. *Judicial Review*.

This order is intended only to improve the internal management of the executive branch, and it is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by a party against the United States, its agencies, or entities, its officers, employees or agents, or any person.

GEORGE W. BUSH"

Appendix A

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ; DISCIPLINARY COUNSEL KATHLEEN M. VAVALA; DAVID A. WHITE, CHIEF DISCIPLINARY COUNSEL; OFFICE DISCIPLINARY COUNSEL; BOARD ON PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF THE STATE OF DELAWARE; PRELIMINARY INVESTIGATORY COMMITTEE; ATTORNEY GENERAL DELAWARE

On Appeal from the United States District Court
for the District of Delaware
(District Court No. 1-21-cv-01490)
District Judge: Hon. Colm F. Connolly

Submitted Pursuant to Third Circuit L.A.R. 34.1(a)
April 11, 2023

Before: CHAGARES, Chief Judge, SCIRICA and AMBRO, Circuit Judges

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JUDGMENT

This cause came to be considered on the record from the United States District Court for the District of Delaware and was submitted on April 11, 2023, pursuant to Third Circuit L.A.R. 34.1(a).

On consideration whereof, it is now hereby ADJUDGED and ORDERED that the appeal is hereby DISMISSED IN PART as MOOT and the remainder of the District Court's judgment entered November 2, 2021, is hereby AFFIRMED. Additionally, the District Court's other orders, including its post-judgment orders entered December 22, 2021, and April 26, 2022, are hereby AFFIRMED. All of the above in accordance with the opinion of this Court. Each party to bear its own costs.

ATTEST:

s/ Patricia S. Dodszuweit
Clerk

DATE: April 20, 2023

Certified as a true copy and issued in lieu of a formal mandate on June 30, 2023

Teste: Patricia A Dodszuweit

Clerk, U.S. Court of Appeals for the Third Circuit

NOT PRECEDENTIAL

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ; DISCIPLINARY COUNSEL KATHLEEN M. VAVALA; DAVID A. WHITE, CHIEF DISCIPLINARY COUNSEL; OFFICE DISCIPLINARY COUNSEL; BOARD ON PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF THE STATE OF DELAWARE; PRELIMINARY INVESTIGATORY COMMITTEE; ATTORNEY GENERAL DELAWARE

On Appeal from the United States District Court
for the District of Delaware
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District Judge: Hon. Colm F. Connolly

Submitted Pursuant to Third Circuit L.A.R. 34.1(a)
April 11, 2023

Before: CHAGARES, Chief Judge, SCIRICA and AMBRO, Circuit Judges

(Filed: April 20, 2023)

OPINION*

CHAGARES, Chief Judge.

Meghan Kelly, a Delaware attorney, filed a complaint for injunctive and related relief to halt a state proceeding to adjust her bar status to "disability inactive" (the "disability proceeding"). The disability proceeding has since concluded. For the reasons that follow, we will dismiss the appeal in part as moot and affirm in part the District Court's judgment dismissing the complaint. We also will affirm the District Court's other orders, including its post-judgment orders denying reconsideration.

I.[1]

Delaware's Office of Disciplinary Counsel ("ODC")[2] informed Kelly in August 2021 that it had concerns about her fitness to practice law and requested that she voluntarily submit to a mental health examination. Kelly refused an examination. The ODC then informed her that it would petition the Preliminary Review Committee ("PRC")[3] to place her Delaware bar membership on disability inactive status.

Kelly responded by filing a 103-page pro se complaint in the United States District

* This disposition is not an opinion of the full Court and, pursuant to I.O.P. 5.7, does not constitute binding precedent.

[1] Because we write for the parties, we recite only facts pertinent to our decision.

[2] The ODC is an independent arm of the Delaware Supreme Court that has authority to recommend disciplinary action regarding the practice of law in Delaware. See Del. Supreme Ct. Rule 64(e)(3).

[3] The PRC reviews the recommendations of the ODC following its initial investigation. Delaware Lawyers' Rules of Disciplinary Procedure ("Del. Disc. Rules") 3(a).

Court for the District of Delaware naming the ODC and several of its officials, the PRC, the Board of Professional Responsibility ("BPR"),[4] and the state Attorney General (collectively referred to as "the defendants"). In it, she claims the defendants are pursuing the disciplinary proceeding to malign and retaliate against her based on her political and religious beliefs. Kelly's complaint seeks injunctive relief and asserts claims under § 1983, for intentional infliction of emotional distress, obstruction of justice, and for injury to her reputation. She seeks relief in the form of an injunction, attorneys' fees, and "possibly" damages for emotional distress. Complaint 103.[5]

The District Court dismissed the complaint and denied related relief, including a request for a preliminary injunction, concluding that it should abstain under Younger v. Harris, 401 U.S. 37 (1971). It determined: (1) the disciplinary proceeding falls within an "exceptional category" covered by Younger, see Sprint Commc'ns v. Jacobs, 571 U.S. 69, 78 (2013); and (2), the disciplinary proceeding is: (a) a state judicial proceeding that (b) implicates important state interests and (c) allows an adequate opportunity to raise constitutional challenges, see Middlesex Cty. Ethics Comm. v. Garden State Bar Ass'n, 457 U.S. 423, 432 (1983). Kelly timely appealed.

Kelly then filed in the District Court a "motion for reargument" and other motions, which the court construed as seeking reconsideration under Federal Rule of

[4] The BPR conducts hearings and makes findings, conclusions, and recommendations in attorney discipline and disability matters. Del. Disc. Rule 2(a). The BPR submits its report and recommendation to the Delaware Supreme Court for review. Del. Disc. Rule 9(e).

[5] Page 103 of the Complaint appears to have been omitted from the Supplemental Appendix.

Civil Procedure 59(e) and denied. Kelly filed an amended notice of appeal to incorporate that order and continued filing motions in that court. She sought, among other things, reconsideration of the reconsideration denial under Rules 52(b) and 59(e). The District Court denied relief, and Kelly filed a second notice of appeal. The appeals have been consolidated for all purposes.

The Delaware Supreme Court issued an order while the appeals were pending, transferring Kelly to disability inactive status.[6] It noted that Kelly's court filings "were confusing and unfocused, irrelevant to the issues at hand, demonstrated a lack of understanding of the role of courts, and were non-compliant with court rules." Supplemental Appendix ("Supp. App.") 149. Due to Kelly's religious objection to a mental health examination, none was conducted. The Delaware Supreme Court instead considered the record, noting that Kelly's "inability to make cogent legal arguments, present relevant evidence, or identify relevant legal authority is painfully clear from the record." Supp. App. 154. It concluded that Kelly's "lack of competence to practice law endangers prospective clients, the public, and the orderly administration of justice." Supp. App. 155. The court also considered and rejected Kelly's constitutional claims.

Kelly's bar status is now disability inactive and she cannot practice law in Delaware. If she wishes to seek reinstatement, she must petition the Delaware Supreme Court for reinstatement to active status. See Del. Disc. Rule 19(c).

[6] The Delaware Supreme Court appointed counsel for Kelly at no cost to her, but she elected to proceed pro se.

II.[7]

A.

Kelly's complaint primarily seeks to vindicate First and Fourteenth Amendment rights through an injunction to halt the disability proceeding. See Supp. App. 130–35; see also Supp. App. 39 ("I brought this law suit . . . to enjoin proceedings brought by the Defendants to place my attorney license on inactive disabled in violation of the First Amendment . . . [and] Fourteenth Amendment. . . ."). Because Delaware since has concluded the disability proceeding, the requested injunctive relief is no longer available. That aspect of the complaint is therefore moot.[8] See Berger v. Cuyahoga County Bar Ass'n, 983 F.2d 718, 724 (6th Cir. 1993) ("[I]ssuance of the [disciplinary] decision by the Ohio Supreme Court moots plaintiffs' claims for injunctive and declaratory relief against defendants."); Partington v. Gedan, 961 F.2d 852, 858 (9th Cir. 1992) (concluding that, when the underlying disciplinary matter came to a close, "a request for injunctive relief from those proceedings is now a moot issue").

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[7] Kelly invoked the District Court's jurisdiction under 28 U.S.C. § 1331. We have jurisdiction to review the District Court's judgment and orders under 28 U.S.C. § 1291.

[8] Kelly presents challenges to the Delaware Supreme Court's order adjusting her status, claiming she was denied notice, discovery, an impartial judge, an ability to present evidence and witnesses, and the like. These issues are beyond the scope of the current appeal. After the District Court dismissed her complaint, Kelly moved to amend the complaint to add claims concerning the Delaware Supreme Court's decision to adjust her bar status and to add the Delaware Supreme Court as a party. It does not appear that the District Court has ruled upon Kelly's post-judgment motions, although it appears that these attempts to pursue a federal court challenge to the Delaware Supreme Court's order would be barred. See, e.g., Partington v. Gedan, 961 F.2d 852, 865 (9th Cir. 1992) (holding that the Rooker-Feldman doctrine barred federal court from reviewing state court imposition of attorney discipline sanction).

B.

To the extent any of Kelly's claims are not moot, we agree that the District Court properly abstained under Younger. We review the District Court's decision to abstain de novo. PDX N., Inc. v. Comm'r N.J. Dep't of Labor, 978 F.3d 871, 881 n.11.

Attorney discipline matters[9] fall within the narrow range of cases in which Younger abstention may be appropriate. See Middlesex County Ethics Comm. v. Garden State Bar Ass'n, 457 U.S. 423, 434 (1982). Younger abstention is therefore appropriate where the disciplinary matter: (1) is a state judicial proceeding that (2) implicates important state interests and (3) provides an adequate opportunity to raise constitutional challenges. Id. at 432. The burden rests on the plaintiff to show that the state procedures do not provide an adequate opportunity to present the federal claims. See Schall v. Joyce, 885 F.2d 101, 107 (3d Cir. 1989).

Kelly argues that the disability proceeding did not permit her to present constitutional claims. She contends, without legal support, that the Delaware Supreme Court is "without subject matter jurisdiction" over her constitutional claims. Kelly Br. 15. Kelly points to no legal bar to bringing her constitutional challenges in the disciplinary proceeding and thus fails to meet her burden.

[9] Delaware conducts attorney discipline and attorney disability matters in the same manner. Del. Disc. Rule 19(c) ("The [disability] procedures and hearings shall be conducted in the same manner as disciplinary proceedings."). We therefore treat the disability proceeding as equivalent to a disciplinary proceeding for purposes of our analysis.

Kelly also contends that abstention was inappropriate due to "bad faith, harassment, or extraordinary circumstances." Kelly Br. 18. She is correct that, if shown, bad faith, harassment, or extraordinary circumstances provide exceptions to Younger abstention. See Middlesex, 457 U.S. at 435. Kelly merely presents conclusory statements in this regard. She has failed to support adequately her claim of bad faith, harassment, or extraordinary circumstances to warrant a Younger exception.

Kelly finally claims that she seeks damages that are not available in the state forum, and so her case should have been stayed under Younger rather than dismissed and now should be permitted to proceed. We disagree because damages are unavailable. Delaware's Disciplinary Rules provide that the BPR, the PRC, the ODC and its members, and others involved in the disciplinary process are "immune from civil suit for any conduct in the discharge of their official duties." Del. Disc. Rule 10.

C.

We review the District Court's denial of reconsideration for abuse of discretion. See Lazaridis v. Wehmer, 591 F.3d 666, 669 (3d Cir. 2010). Kelly did not show an intervening change in controlling law, the availability of new evidence, or the need to correct a clear error of law or fact to prevent manifest injustice, and thus did not meet the standard for reconsideration. See Max's Seafood Café ex rel. Lou-Ann, Inc. v. Quinteros, 176 F.3d 669, 677 (3d Cir. 1999). The District Court therefore did not abuse its discretion in denying relief.

D.

Kelly seeks review of every interim ruling the District Court made in her proceeding. We have considered her arguments and the record below and conclude that no relief is warranted.

III.

For the foregoing reasons, we will dismiss as moot any claims concerning the aspects of Kelly's complaint that seek injunctive relief. We will affirm the remainder of the District Court's judgment, its post-judgment orders, and all other orders on appeal.[10]

[10] The defendants' motion for summary affirmance is denied. The defendants' motion to supplement the appendix is granted. Kelly's motion to correct an error of fact is considered but no action will be taken, as it is unclear what relief it seeks. Kelly's motion for reconsideration is denied.

OFFICE OF THE CLERK

PATRICIA S. DODSZUWEIT

CLERK

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT
21400 UNITED STATES COURTHOUSE
601 MARKET STREET
PHILADELPHIA, PA 19106-1790
Website: www.ca3.uscourts.gov

TELEPHONE
215-597-2995

June 30, 2023

Randall C. Lohan
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N King Street
Wilmington, DE 19801

RE: Meghan Kelly v. Patricia Swartz, et al
Case Numbers: 21-3198 & 22-2079
District Court Case Number: 1-21-cv-01490

Dear District Court Clerk,

Enclosed herewith is the certified judgment together with copy of the opinion or certified copy of the order in the above-captioned case. The certified judgment is issued in lieu of a formal mandate and is to be treated in all respects as a mandate.

Counsel are advised of the issuance of the mandate by copy of this letter. The certified judgment or order is also enclosed showing costs taxed, if any.

For the Court,

s/ Patricia S. Dodszuweit
Clerk

s/ pdb Case Manager

cc:

Attorney General Delaware
Meghan M. Kelly
Caneel Radinson-Blasucci
Zi-Xiang Shen

Appendix B

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

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Submitted Pursuant to Third Circuit L.A.R. 34.1(a)
April 11, 2023

Before: CHAGARES, Chief Judge, SCIRICA and AMBRO, Circuit Judges

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JUDGMENT

This cause came to be considered on the record from the United States District Court for the District of Delaware and was submitted on April 11, 2023, pursuant to Third Circuit L.A.R. 34.1(a).

On consideration whereof, it is now hereby ADJUDGED and ORDERED that the appeal is hereby DISMISSED IN PART as MOOT and the remainder of the District Court's judgment entered November 2, 2021, is hereby AFFIRMED. Additionally, the District Court's other orders, including its post-judgment orders entered December 22, 2021, and April 26, 2022, are hereby AFFIRMED. All of the above in accordance with the opinion of this Court. Each party to bear its own costs.

ATTEST:

s/ Patricia S. Dodszuweit
Clerk

DATE: April 20, 2023

OFFICE OF THE CLERK

PATRICIA S. DODSZUWEIT

CLERK

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT
21400 UNITED STATES COURTHOUSE
601 MARKET STREET
PHILADELPHIA, PA 19106-1790
Website: www.ca3.uscourts.gov

TELEPHONE
215-597-2995

April 20, 2023

Attorney General Delaware
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Delaware Department of Justice
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Zi-Xiang Shen
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Wilmington, DE 19801

RE: Meghan Kelly v. Patricia Swartz, et al
Case Numbers: 21-3198 & 22-2079
District Court Case Number: 1-21-cv-01490

ENTRY OF JUDGMENT

Today, **April 20, 2023** the Court entered its judgment in the above-captioned matter pursuant to Fed. R. App. P. 36.

If you wish to seek review of the Court's decision, you may file a petition for rehearing. The procedures for filing a petition for rehearing are set forth in Fed. R. App. P. 35 and 40, 3rd Cir. LAR 35 and 40, and summarized below.

Time for Filing:
14 days after entry of judgment.
45 days after entry of judgment in a civil case if the United States is a party.

Form Limits:
3900 words if produced by a computer, with a certificate of compliance pursuant to Fed. R. App. P. 32(g).
15 pages if hand or type written.

Attachments:
A copy of the panel's opinion and judgment only.
Certificate of service.
Certificate of compliance if petition is produced by a computer.
No other attachments are permitted without first obtaining leave from the Court.

Unless the petition specifies that the petition seeks only panel rehearing, the petition will be construed as requesting both panel and en banc rehearing. Pursuant to Fed. R. App. P. 35(b)(3), if separate petitions for panel rehearing and rehearing en banc are submitted, they will be treated as a single document and will be subject to the form limits as set forth in Fed. R. App. P. 35(b)(2). If only panel rehearing is sought, the Court's rules do not provide for the subsequent filing of a petition for rehearing en banc in the event that the petition seeking only panel rehearing is denied.

A party who is entitled to costs pursuant to Fed.R.App.P. 39 must file an itemized and verified bill of costs within 14 days from the entry of judgment. The bill of costs must be submitted on the proper form which is available on the court's website.

A mandate will be issued at the appropriate time in accordance with the Fed. R. App. P. 41.

Please consult the Rules of the Supreme Court of the United States regarding the timing and requirements for filing a petition for writ of certiorari.

For the Court,

s/ Patricia S. Dodszuweit
Clerk

s/ pdb Case Manager 267-299-4943

NOT PRECEDENTIAL

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ; DISCIPLINARY COUNSEL KATHLEEN M. VAVALA; DAVID A. WHITE, CHIEF DISCIPLINARY COUNSEL; OFFICE DISCIPLINARY COUNSEL; BOARD ON PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF THE STATE OF DELAWARE; PRELIMINARY INVESTIGATORY COMMITTEE; ATTORNEY GENERAL DELAWARE

On Appeal from the United States District Court
for the District of Delaware
(District Court No. 1-21-cv-01490)
District Judge: Hon. Colm F. Connolly

Submitted Pursuant to Third Circuit L.A.R. 34.1(a)
April 11, 2023

Before: CHAGARES, Chief Judge, SCIRICA and AMBRO, Circuit Judges

(Filed: April 20, 2023)

OPINION*

CHAGARES, Chief Judge.

Meghan Kelly, a Delaware attorney, filed a complaint for injunctive and related relief to halt a state proceeding to adjust her bar status to "disability inactive" (the "disability proceeding"). The disability proceeding has since concluded. For the reasons that follow, we will dismiss the appeal in part as moot and affirm in part the District Court's judgment dismissing the complaint. We also will affirm the District Court's other orders, including its post-judgment orders denying reconsideration.

I.[1]

Delaware's Office of Disciplinary Counsel ("ODC")[2] informed Kelly in August 2021 that it had concerns about her fitness to practice law and requested that she voluntarily submit to a mental health examination. Kelly refused an examination. The ODC then informed her that it would petition the Preliminary Review Committee ("PRC")[3] to place her Delaware bar membership on disability inactive status.

Kelly responded by filing a 103-page pro se complaint in the United States District

* This disposition is not an opinion of the full Court and, pursuant to I.O.P. 5.7, does not constitute binding precedent.

[1] Because we write for the parties, we recite only facts pertinent to our decision.

[2] The ODC is an independent arm of the Delaware Supreme Court that has authority to recommend disciplinary action regarding the practice of law in Delaware. See Del. Supreme Ct. Rule 64(e)(3).

[3] The PRC reviews the recommendations of the ODC following its initial investigation. Delaware Lawyers' Rules of Disciplinary Procedure ("Del. Disc. Rules") 3(a).

Court for the District of Delaware naming the ODC and several of its officials, the PRC, the Board of Professional Responsibility ("BPR"),[4] and the state Attorney General (collectively referred to as "the defendants"). In it, she claims the defendants are pursuing the disciplinary proceeding to malign and retaliate against her based on her political and religious beliefs. Kelly's complaint seeks injunctive relief and asserts claims under § 1983, for intentional infliction of emotional distress, obstruction of justice, and for injury to her reputation. She seeks relief in the form of an injunction, attorneys' fees, and "possibly" damages for emotional distress. Complaint 103.[5]

The District Court dismissed the complaint and denied related relief, including a request for a preliminary injunction, concluding that it should abstain under Younger v. Harris, 401 U.S. 37 (1971). It determined: (1) the disciplinary proceeding falls within an "exceptional category" covered by Younger, see Sprint Commc'ns v. Jacobs, 571 U.S. 69, 78 (2013); and (2), the disciplinary proceeding is: (a) a state judicial proceeding that (b) implicates important state interests and (c) allows an adequate opportunity to raise constitutional challenges, see Middlesex Cty. Ethics Comm. v. Garden State Bar Ass'n, 457 U.S. 423, 432 (1983). Kelly timely appealed.

Kelly then filed in the District Court a "motion for reargument" and other motions, which the court construed as seeking reconsideration under Federal Rule of

[4] The BPR conducts hearings and makes findings, conclusions, and recommendations in attorney discipline and disability matters. Del. Disc. Rule 2(a). The BPR submits its report and recommendation to the Delaware Supreme Court for review. Del. Disc. Rule 9(e).

[5] Page 103 of the Complaint appears to have been omitted from the Supplemental Appendix.

Civil Procedure 59(e) and denied. Kelly filed an amended notice of appeal to incorporate that order and continued filing motions in that court. She sought, among other things, reconsideration of the reconsideration denial under Rules 52(b) and 59(e). The District Court denied relief, and Kelly filed a second notice of appeal. The appeals have been consolidated for all purposes.

The Delaware Supreme Court issued an order while the appeals were pending, transferring Kelly to disability inactive status.[6] It noted that Kelly's court filings "were confusing and unfocused, irrelevant to the issues at hand, demonstrated a lack of understanding of the role of courts, and were non-compliant with court rules." Supplemental Appendix ("Supp. App.") 149. Due to Kelly's religious objection to a mental health examination, none was conducted. The Delaware Supreme Court instead considered the record, noting that Kelly's "inability to make cogent legal arguments, present relevant evidence, or identify relevant legal authority is painfully clear from the record." Supp. App. 154. It concluded that Kelly's "lack of competence to practice law endangers prospective clients, the public, and the orderly administration of justice." Supp. App. 155. The court also considered and rejected Kelly's constitutional claims.

Kelly's bar status is now disability inactive and she cannot practice law in Delaware. If she wishes to seek reinstatement, she must petition the Delaware Supreme Court for reinstatement to active status. See Del. Disc. Rule 19(e).

---

[6] The Delaware Supreme Court appointed counsel for Kelly at no cost to her, but she elected to proceed pro se.

II.[7]

A.

Kelly's complaint primarily seeks to vindicate First and Fourteenth Amendment rights through an injunction to halt the disability proceeding. See Supp. App. 130–35; see also Supp. App. 39 ("I brought this law suit . . . to enjoin proceedings brought by the Defendants to place my attorney license on inactive disabled in violation of the First Amendment . . . [and] Fourteenth Amendment. . . ."). Because Delaware since has concluded the disability proceeding, the requested injunctive relief is no longer available. That aspect of the complaint is therefore moot.[8] See Berger v. Cuyahoga County Bar Ass'n, 983 F.2d 718, 724 (6th Cir. 1993) ("[I]ssuance of the [disciplinary] decision by the Ohio Supreme Court moots plaintiffs' claims for injunctive and declaratory relief against defendants."); Partington v. Gedan, 961 F.2d 852, 858 (9th Cir. 1992) (concluding that, when the underlying disciplinary matter came to a close, "a request for injunctive relief from those proceedings is now a moot issue").

---

[7] Kelly invoked the District Court's jurisdiction under 28 U.S.C. § 1331. We have jurisdiction to review the District Court's judgment and orders under 28 U.S.C. § 1291.

[8] Kelly presents challenges to the Delaware Supreme Court's order adjusting her status, claiming she was denied notice, discovery, an impartial judge, an ability to present evidence and witnesses, and the like. These issues are beyond the scope of the current appeal. After the District Court dismissed her complaint, Kelly moved to amend the complaint to add claims concerning the Delaware Supreme Court's decision to adjust her bar status and to add the Delaware Supreme Court as a party. It does not appear that the District Court has ruled upon Kelly's post-judgment motions, although it appears that these attempts to pursue a federal court challenge to the Delaware Supreme Court's order would be barred. See, e.g., Partington v. Gedan, 961 F.2d 852, 865 (9th Cir. 1992) (holding that the Rooker-Feldman doctrine barred federal court from reviewing state court imposition of attorney discipline sanction).

B.

To the extent any of Kelly's claims are not moot, we agree that the District Court properly abstained under Younger. We review the District Court's decision to abstain de novo. PDX N., Inc. v. Comm'r N.J. Dep't of Labor, 978 F.3d 871, 881 n.11.

Attorney discipline matters[9] fall within the narrow range of cases in which Younger abstention may be appropriate. See Middlesex County Ethics Comm. v. Garden State Bar Ass'n, 457 U.S. 423, 434 (1982). Younger abstention is therefore appropriate where the disciplinary matter: (1) is a state judicial proceeding that (2) implicates important state interests and (3) provides an adequate opportunity to raise constitutional challenges. Id. at 432. The burden rests on the plaintiff to show that the state procedures do not provide an adequate opportunity to present the federal claims. See Schall v. Joyce, 885 F.2d 101, 107 (3d Cir. 1989).

Kelly argues that the disability proceeding did not permit her to present constitutional claims. She contends, without legal support, that the Delaware Supreme Court is "without subject matter jurisdiction" over her constitutional claims. Kelly Br. 15. Kelly points to no legal bar to bringing her constitutional challenges in the disciplinary proceeding and thus fails to meet her burden.

[9] Delaware conducts attorney discipline and attorney disability matters in the same manner. Del. Disc. Rule 19(c) ("The [disability] procedures and hearings shall be conducted in the same manner as disciplinary proceedings."). We therefore treat the disability proceeding as equivalent to a disciplinary proceeding for purposes of our analysis.

Kelly also contends that abstention was inappropriate due to "bad faith, harassment, or extraordinary circumstances." Kelly Br. 18. She is correct that, if shown, bad faith, harassment, or extraordinary circumstances provide exceptions to Younger abstention. See Middlesex, 457 U.S. at 435. Kelly merely presents conclusory statements in this regard. She has failed to support adequately her claim of bad faith, harassment, or extraordinary circumstances to warrant a Younger exception.

Kelly finally claims that she seeks damages that are not available in the state forum, and so her case should have been stayed under Younger rather than dismissed and now should be permitted to proceed. We disagree because damages are unavailable. Delaware's Disciplinary Rules provide that the BPR, the PRC, the ODC and its members, and others involved in the disciplinary process are "immune from civil suit for any conduct in the discharge of their official duties." Del. Disc. Rule 10.

C.

We review the District Court's denial of reconsideration for abuse of discretion. See Lazaridis v. Wehmer, 591 F.3d 666, 669 (3d Cir. 2010). Kelly did not show an intervening change in controlling law, the availability of new evidence, or the need to correct a clear error of law or fact to prevent manifest injustice, and thus did not meet the standard for reconsideration. See Max's Seafood Café ex rel. Lou-Ann, Inc. v. Quinteros, 176 F.3d 669, 677 (3d Cir. 1999). The District Court therefore did not abuse its discretion in denying relief.

D.

Kelly seeks review of every interim ruling the District Court made in her proceeding. We have considered her arguments and the record below and conclude that no relief is warranted.

III.

For the foregoing reasons, we will dismiss as moot any claims concerning the aspects of Kelly's complaint that seek injunctive relief. We will affirm the remainder of the District Court's judgment, its post-judgment orders, and all other orders on appeal.[10]

[10] The defendants' motion for summary affirmance is denied. The defendants' motion to supplement the appendix is granted. Kelly's motion to correct an error of fact is considered but no action will be taken, as it is unclear what relief it seeks. Kelly's motion for reconsideration is denied.

Appendix C

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

No. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ; DISCIPLINARY COUNSEL KATHLEEN M. VAVALA; DAVID A. WHITE, CHIEF DISCIPLINARY COUNSEL; OFFICE DISCIPLIANRY COUNSEL; BOARD ON PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF THE STATE OF DELAWARE; PRELIMINARY INVESTIGATORY COMMITTEE; ATTORNEY GENERAL DELAWARE

On Appeal from the United States District Court
for the District of Delaware
(District Court No. 1-21-cv-01490)

SUR PETITION FOR PANEL REHEARING

Present: CHAGARES, Chief Judge, SCIRICA, and AMBRO, Circuit Judges

The petition for rehearing filed by Meghan M. Kelly, Appellant in the above-entitled case having been submitted to the judges who participated in the decision of this Court, it is hereby

O R D E R E D that the petition for rehearing by the panel is denied.

BY THE COURT,

s/Michael A. Chagares
Chief Circuit Judge

Dated: June 22, 2023
PDB/cc: Meghan M. Kelly
All Counsel of Record

Appendix D

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ; et al.

(D. Del. No. 1-21-cv-01490)

Present: SCIRICA, Circuit Judge

1. Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 to recuse Honorable Judge Anthony J. Scirica;

2. Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 for caveat to Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority;

3. Motion by Appellant for a Second Caveat to Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent judges from speaking engagements on behalf of political think tanks such as lobbyists at the Federalist Society.

Respectfully,
Clerk/pdb

ORDER

The foregoing motions are denied.

By the Court,

s/ Anthony J. Scirica
Circuit Judge

Dated: June 20, 2023
PDB/cc: Meghan M. Kelly
All Counsel of Record

Appendix E

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ;
DISCIPLINARY COUNSEL KATHLEEN M. VAVALA; DAVID A. WHITE,
Chief Disciplinary Counsel; OFFICE DISCIPLINARY COUNSEL;
BOARD ON PROFESSIONAL RESPONSIBILITY OF THE
SUPREME COURT OF THE STATE OF DELAWARE;
PRELIMINARY INVESTIGATORY COMMITTEE;
ATTORNEY GENERAL DELAWARE

(D. Del. No. 1-21-cv-01490)

Present: CHAGARES, Chief Judge, SCIRICA and AMBRO, Circuit Judge

1. Motion by Appellant to Reconsider the Order dated June 20, 2023 Denying Appellant's Motion for the Recusal of Judge Scirica and Pursuant to Rule 2 for a New Panel to Consider my Motion for a Rehearing (Docket Entry No. 206);

2. Motion by Appellant to Strike Exhibit No. 6 Pages 56 through 111 to Docket Entry No. 206.

Respectfully,
Clerk/pdb

ORDER

Appellant previously moved for the recusal of Judge Anthony Scirica in this matter. Upon review of appellant's motion, Judge Scirica concluded that he need not recuse in this case. By order entered June 20, 2023, Appellant's motion to recuse Judge Scirica was denied.

Appellant now seeks en banc review of Judge Scirica's decision not to recuse and to have a new panel hear her appeal. The merits panel declines to refer the matter to the en banc Court and instead shall rule on Appellant's request. 3rd Cir. I.O.P. 10.3.3. Appellant's request for reconsideration is denied. Judge Scirica's prior position as

member and chair of the Committee on Judicial Conduct and Disability is not cause for his recusal in this matter. Appellant has not demonstrated any basis which would question Judge Scircia's impartiality to consider this case and the matter will not be assigned to another merits panel.

By opinion and judgment entered April 20, 2023, this panel affirmed the decision of the District Court. Appellant's petition for panel rehearing was denied on June 22, 2023. Further review of an or the decision by this Court in this case should be presented in the Supreme Court of the United States. This matter is closed in the Court of Appeals.

Appellant's motion to strike exhibit No. 6 at pages 56 through 111 to docket entry No. 206 is granted.

By the Court,

s/ Michael A. Chagares
Circuit Judge

Dated: July 10, 2023
PDB/cc: Meghan M. Kelly, Esq.
All Counsel of Record

Appendix F

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Nos. 21-3198 & 22-2079

Meghan Kelly,

Appellant

v.

Patricia Shwartz, et al.

(D. Del. 1-21-cv-01490)

1) Motion by Appellant Meghan M. Kelly to recuse the Honorable Tamika Montgomery-Reeves
2) Motion by Appellant to Recuse the Honorable Peter J. Phipps
3) Motion by Appellant to waive costs for preparation and transmittal of the record to the Supreme Court of the United States in *Meghan M. Kelly v. Disciplinary Counsel Patricia B. Swartz, et al.*, S.Ct. No. 22-6783

ORDER

At the direction of the Court, the motion to recuse the Honorable Tamika Montgomery-Reeves is granted. The motion to recuse the Honorable Peter J. Phipps is denied. The motion to waive costs for transmittal of the record to the Supreme Court of the United States is denied as unnecessary and premature. In the event that the Supreme Court should grant Appellant's petition for writ of certiorari, the Supreme Court will contact the Clerk for the Court of Appeals who will transmit the record. Should Appellant seek relief from any other costs associated with the petition for writ of certiorari, Appellant should seek such relief in the Supreme Court.

For the Court,

s/ Patricia S. Dodszuweit

Clerk

Date: March 15, 2023

PDB/cc: Meghan M. Kelly, Esq.
Caneel Radinson-Blasucci, Esq.
Zi-Xiang Shen, Esq.

Appendix G

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

CCO-028

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ; DISCIPLINARY COUNSEL KATHLEEN M. VAVALA; DAVID A. WHITE, Chief Disciplinary Counsel; OFFICE DISCIPLINARY COUNSEL; BOARD ON PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF THE STATE OF DELAWARE; PRELIMINARY INVESTIGATORY COMMITTEE; ATTORNEY GENERAL DELAWARE

(D. Del. No. 1-21-cv-01490)

Present: PHIPPS, Circuit Judge

1. Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 for Extension of Time to File Brief for 45 Days.

2. Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 to Stay Appeals while Appellant Petitions the Supreme Court of the United States to Review the State-Court Disciplinary Decision and the Third Circuit's Reciprocal Disciplinary Decision

Respectfully,
Clerk/pdb

ORDER

The foregoing Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 for Extension of Time to File Brief for 45 Days is granted. Beyond this extension, this order provides no other relief. The motion to stay these appeals is denied.

By the Court,

s/ Peter J. Phipps
Circuit Judge

Dated: January 6, 2023
PDB/cc: Meghan M. Kelly, Esq.
Caneel Radinson-Blasucci, Esq
Zi-Xiang Shen, Esq.

Appendix H

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Nos. 21-3198 & 22-2079

Kelly v. Swartz

To: Clerk

1) Appellant's Motion to Recuse Judge Hardiman and Future Judge Montgomery-Reeves

---

At the direction of the Court, the request for Judge Hardiman's recusal is granted.

No action will be taken on the request to recuse future Judge Montgomery-Reeves. As the appellant alludes to in her motion, future Judge Montgomery-Reeves has not yet received her commission and become a judge of this Court. The appellant may renew her request for future Judge Montgomery-Reeves's recusal after she becomes a judge of this Court. That may not be necessary, however, if this appeal is assigned to a merits panel in the meantime that does not include her. A formal recusal motion may also be unnecessary if, as may be the case, future Judge Montgomery-Reeves participated in related state-court proceedings. See 3d Cir. L.A.R. 26.1.2.

For the Court,

s/ Patricia S. Dodszuweit
Clerk

Dated: January 6, 2023
PDB/cc: Meghan M. Kelly, Esq.
Caneel Radinson-Blasucci, Esq.
Zi-Xiang Shen, Esq.

Appendix I

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

MEGHAN KELLY,

Plaintiff,

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ, et al.,

Defendants.

) Civ. Action No. 21-1490-CFC

ORDER

At Wilmington this Second day of November in 2021, for the reasons set forth in the Memorandum issued this date,

IT IS ORDERED that:

1. Plaintiff's motion to expedite is DENIED. (D.I. 6)

2. Plaintiff's motions for temporary restraining order, preliminary injunction, and exemption from bond, motion to e-file, and motion to appear remotely are DISMISSED as moot. (D.I. 7, 9, 11, 12)

3. Plaintiff's letter/motion for emergency relief is DENIED. (D.I. 14)

4. The Court abstains under the Younger abstention doctrine and the Complaint is DISMISSED.

5. The Clerk of Court is directed to CLOSE the case.

Chief Judge

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

MEGHAN KELLY, Plaintiff, v. DISCIPLINARY COUNSEL PATRICIA B. SWARTZ, et al., Defendants.	)	Civ. Action No. 21-1490-CFC

MEMORANDUM

Pro se Plaintiff Meghan Kelly is a Delaware attorney. Defendants are the Delaware Board on Professional Responsibility (the Board), the Office of Disciplinary Counsel of the Supreme Court of the State of Delaware (the ODC), the ODC's counsel, the Preliminary Review Committee (PRC), and the Delaware Attorney General. Plaintiff filed this action on October 25, 2021 pursuant to 42 U.S.C. § 1983 and § 1985 and Federal Rule of Civil Procedure 65. She seeks an order "to enjoin proceedings brought by the Defendants to place [her] attorney license on inactive disabled" status in violation of her First and Fourteenth Amendment rights. (D.I. 2 ¶ 14) She has filed a motion to expedite, two motions for injunctive relief, a letter/motion for emergency relief, and motions to e-file and to appear remotely. (D.I. 6, 7, 9, 11, 12, 14)

I.

On August 23, 2021, the ODC informed Plaintiff by letter that the content of several pleadings Plaintiff filed in a lawsuit in Delaware's Court of Chancery "raise[d] serious concerns as to [Plaintiff's] mental capacity and fitness to practice law." (D.I. 7- 1 at 95) The ODC requested that Plaintiff voluntarily submit to a mental health

examination on September 7, 2021 to determine her fitness and mental capacity to practice law. (D.I. 7-1 at 96) Plaintiff refused to submit to this examination. On September 27, 2021, the ODC sent Plaintiff a letter stating that it was going to present to the PRC on November 3, 2021 a petition to transfer Plaintiff to disability inactive status. (D.I. 7-1 at 103)

II.

The Delaware Supreme Court, through its inherent power and authority and pursuant to section 161 of Title 10 of the Delaware Code, maintains standards of professional conduct for all lawyers subject to its jurisdiction, disposes of individual cases of lawyer discipline and mental capacity, and administers the system by which disciplinary and mental capacity determinations are made. *See* 10 Del. C. § 161; Del. Law. R. of Disciplinary Proc. (DLRDP) Rule 1(a). That system is comprised of three agencies created by the Delaware Supreme Court: the Board, the ODC, and the PRC. *See* DLRDP 1(b). Disciplinary and disability matters are heard by the Board, upon a petition filed by the ODC after approval by the PRC. *See* DLRDP 9. The Board's rulings on disciplinary and mental capacity matters are subject to review by the Delaware Supreme Court. *See In re Nadel*, 82 A.3d 716, 720 (Del. 2013) (holding that role of Delaware's Supreme Court in disciplinary proceedings "is to review the record independently and determine whether there is substantial evidence to support the [Board's] factual findings."). The procedures and hearings for discipline and mental capacity proceedings are the same. DLRDP 19(c).

III.

The *Younger* abstention doctrine requires that the Court abstain from adjudicating Plaintiff's Complaint and motions. *Middlesex Cty. Ethics Comm. v. Garden State Bar Ass'n*, 457 U.S. 423, 432 (1982). The Court may raise the issue of *Younger* abstention *sua sponte*. *O'Neill v. City of Philadelphia*, 32 F.3d 785, n.1 (3d Cir. 1994).

"*Younger* . . . and its progeny espouse a strong federal policy against federal-court interference with pending state judicial proceedings absent extraordinary circumstances." *Middlesex*, 457 U.S. at 423. Under *Middlesex*, the issue of whether a state bar's discipline (and thus, in this case, mental capacity) proceeding falls within the reach of *Younger* turns on three questions: (1) whether the proceeding is a state judicial proceeding; (2) whether the proceeding implicates important state interests; and (3) whether there is an adequate opportunity in the proceeding to raise constitutional challenges. *Id.* at 432.

Before ascertaining whether the *Middlesex* conditions exist, the Court must first determine whether the parallel state action falls within one of "three exceptional categories": (1) criminal prosecutions, (2) "certain civil enforcement proceedings," or (3) "civil proceedings involving certain orders uniquely in furtherance of the state courts' ability to perform their judicial functions." *Sprint Communications, Inc. v. Jacobs*, 571 U.S. 69, 78 (2013) (quotation marks, alteration omitted); *see also Harmon v. Department of Finance*, 811 F. App'x 156, 158 (2020).

In *Middlesex* the Court held that state attorney disciplinary proceedings "bear a

close relationship to proceedings criminal in nature." 457 U.S. at 432; *see also Sprint*, 571 U.S. at 70. Delaware treats attorney mental capacity proceedings in the same manner it treats attorney disciplinary proceedings. DLRDP 19(c). Formal charges of incapacity may be instituted only upon a finding of probable cause by the PRC. DLRDP 9(c). If an attorney contests the findings of the PRC, a hearing is held before the Board. DLRDP 9(d). The hearing is governed by the Delaware Rules of Evidence, DLRDP 9(f)(2); sworn testimony may be adduced at the hearing by both the ODC and the attorney, DLRDP 9(f)(1). An attorney can appeal adverse findings of the Board to the Delaware Supreme Court, which "review[s] the record independently and determine[s] whether there is substantial evidence to support the [Board's] factual findings." *In re Nadel*, 82 A.3d at 720. These procedures and the role the Delaware Supreme Court exercises in attorney mental capacity proceedings make clear that the proceedings bear a close relationship to criminal proceedings and fall within one of the exceptional categories covered by *Younger*.

The Court therefore turns to the three *Middlesex* conditions. First, Delaware's mental capacity proceedings for attorneys constitute state judicial proceedings. *In re Nadel*, 82 A.3d at 720. Second, Delaware has an extremely important interest in ensuring that its attorneys do not suffer from a mental incapacity. *See Middlesex*, 457 U.S. at 434 (recognizing "the important state obligation to regulate persons who are authorized to practice law"). Third, "[m]inimal respect for the state processes . . . precludes any *presumption* that the state courts will not safeguard federal constitutional rights." *Id.* (emphasis in the original). Plaintiff has not alleged, and there is no reason

to believe that the Delaware Supreme Court would deny her an opportunity to raise the constitutional challenges she makes in her Complaint.

Accordingly, the Court will: (1) deny Plaintiff's motion to expedite (D.I. 6) and letter/motion for emergency relief (D.I. 14); and (2) dismiss as moot the motions for temporary restraining order and preliminary injunction, to e-file and to appear remotely (D.I. 7, 9, 11, 12); and (3) abstain under the *Younger* abstention doctrine and dismiss the Complaint.

An appropriate Order will be entered.

Chief Judge

November 2, 2021
Wilmington, Delaware

Appendix J

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

MEGHAN KELLY,

Plaintiff,

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ, et al.,

Defendants.

: Civ. No. 21-1490-CFC

ORDER

At Wilmington this Twenty-second day of December in 2021, for the reasons set forth in the Memorandum issued this date,

IT IS HEREBY ORDERED that:

1. Plaintiff's motion for reargument construed as a motion for reconsideration is **denied**. (D.I. 20)

2. Plaintiff's motion to amend the motion for reargument is **granted**. (D.I. 21)

3. Plaintiff's motion to amend Exhibit G of the Complaint is **denied** as moot. (D.I. 23)

Chief Judge

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

MEGHAN KELLY,

Plaintiff,

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ, et al.,

Defendants.

Civ. No. 21-1490-CFC

MEMORANDUM

I. INTRODUCTION

Pro se Plaintiff Meghan Kelly is a Delaware attorney. Defendants are the Delaware Board on Professional Responsibility (the Board), the Office of Disciplinary Counsel of the Supreme Court of the State of Delaware (the ODC), the ODC's counsel, the Preliminary Review Committee (PRC), and the Delaware Attorney General. Plaintiff filed this action on October 25, 2021 pursuant to 42 U.S.C. § 1983 and § 1985 and Federal Rule of Civil Procedure 65. She sought an order "to enjoin proceedings brought by the Defendants to place [her] attorney license on inactive disabled" status in violation of her First and Fourteenth Amendment rights. (D.I. 2 ¶ 14) On November 2, 2021, the Court denied Plaintiff's motion to expedite and letter/motion for emergency relief, dismissed as moot motions for temporary restraining order and preliminary injunction, to e-file and to appear remotely, abstained under the Younger abstention doctrine, and dismissed the Complaint. (D.I. 16, 17)

Plaintiff has filed a motion for reargument construed as a motion for reconsideration, a motion to amend the motion for reargument, a motion to amend

Exhibit G to the Complaint, and a letter asking me to consider new evidence. (D.I. 20, 21, 23, 29) I will grant Plaintiff's motion to amend the motion for reargument and will consider the amended reargument. (D.I. 21) I do not consider the "new evidence" as it did not exist when Plaintiff commenced this action.

II. MOTION FOR RECONSIDERATION

Plaintiff moves for reconsideration of the November 2, 2021 Memorandum and Order on the grounds that it "essentially eliminat[ed her] ability to protect [her] fundamental rights in exchange for [her] license to practice law" and sacrificed her individual liberties. (D.I. 20 at 20; D.I. 21-2) In addition, Plaintiff asserts the Court erred as a matter of law by disregarding all her pled facts and legal arguments. (*Id.*)

The standard for obtaining relief under Rule 59(e) is difficult for Plaintiff to meet. The purpose of a motion for reconsideration is to "correct manifest errors of law or fact or to present newly discovered evidence." *Max's Seafood Café ex rel. Lou-Ann, Inc. v. Quinteros*, 176 F.3d 669, 677 (3d Cir. 1999). "A proper Rule 59(e) motion . . . must rely on one of three grounds: (1) an intervening change in controlling law; (2) the availability of new evidence; or (3) the need to correct a clear error of law or fact or to prevent manifest injustice." *Lazaridis v. Wehmer*, 591 F.3d 666, 669 (3d Cir. 2010) (citing *North River Ins. Co. v. CIGNA Reinsurance Co.*, 52 F.3d 1194, 1218 (3d Cir. 1995)). A motion for reconsideration is not properly grounded on a request that a court rethink a decision already made. *See Glendon Energy Co. v. Borough of Glendon*, 836 F. Supp. 1109, 1122 (E.D. Pa. 1993). Motions for reargument or reconsideration may not be used "as a means to argue new facts or issues that inexcusably were not presented to the court in the matter previously decided." *Brambles USA, Inc. v.*

Blocker, 735 F. Supp. 1239, 1240 (D. Del. 1990). Reargument, however, may be appropriate where "the Court has patently misunderstood a party, or has made a decision outside the adversarial issues presented to the court by the parties, or has made an error not of reasoning but of apprehension." *Brambles USA*, 735 F. Supp. at 1241 (D. Del. 1990) (citations omitted); *See also* D. Del. LR 7.1.5.

The Court has reviewed Plaintiff's motion for reconsideration and amended motion, both of which provide great detail on why she believes reconsideration is appropriate. The Court has also reviewed the Complaint, the applicable law, and the Memorandum and Order at issue, and analyzed the issues while considering Plaintiff's motions. Except for the copies of statutes and newspaper articles that are readily available, the "new evidence" Plaintiff asked the Court to consider was obtained after this Court's November 2, 2021 ruling. That type of "new evidence" does not justify reconsideration. *See Sherwin-Williams Co., v. PPG Indus., Inc.*, 2021 WL 3710128, at *4 (W.D. Pa. Aug. 20, 2021); *see also Hudson's Bay Co. Fur Sales v. Am. Legend Coop.*, 651 F. Supp. 819, 846 (D.N.J.1987) (In ruling on a motion for reconsideration Court should consider new evidence only if it existed at the time of the operative pleading, but was either not discoverable or unavailable during discovery). Moreover, even if the I considered the "new evidence," Plaintiff has failed to demonstrate any of the necessary grounds to warrant a reconsideration of the Court's November 2, 2021 Memorandum and Order. Therefore, the motion and amended motion for reconsideration will be denied. (D.I. 20)

III. MOTION TO AMEND

Plaintiff moves to amend Exhibit G that is attached to the Complaint. (D.I. 23)

She indicates that the most important page of Exhibit G, the last page, is missing. The last page shows that Plaintiff "crossed off local counsel's address" as instructed by Chancery Court staff. (D.I. 23 at 1) The motion will be denied as moot. The page in question was previously filed as "Exhibits to Appendix G". (*See* D.I. 4-9 at 196).

IV. CONCLUSION

For the above reasons, the Court will: (1) deny Plaintiff's motion for reargument (D.I. 20); (2) grant Plaintiff's motion to amend the motion for reargument[1] (D.I. 21); and (3) deny as moot Plaintiff's motion to amend Exhibit G (D.I. 23).

An appropriate order will be entered.

December 22, 2021
Wilmington, Delaware

Chief Judge

[1] As discussed, I considered the amended motion for reargument.

Appendix K

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

MEGHAN KELLY,

Plaintiff,

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ, et al.,

Defendants.

Civ. No. 21-1490-CFC

ORDER

At Wilmington this ____ day of April in 2022, for the reasons set forth in the Memorandum issued this date,

IT IS HEREBY ORDERED that:

Plaintiff's pending motions (D.I. 33, 34, 36, 37, 39, 41, 42, 47, 48, 54) are DENIED.

Chief Judge

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

MEGHAN KELLY,

Plaintiff,

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ, et al.,

Defendants.

: Civ. No. 21-1490-CFC

MEMORANDUM

I. INTRODUCTION AND BACKGROUND

Pro se Plaintiff Meghan Kelly is a Delaware attorney. Defendants are the Delaware Board on Professional Responsibility (the Board), the Office of Disciplinary Counsel of the Supreme Court of the State of Delaware (the ODC), the ODC's counsel, the Preliminary Review Committee (PRC), and the Delaware Attorney General. Plaintiff filed this action on October 25, 2021 pursuant to 42 U.S.C. § 1983 and § 1985 and Federal Rule of Civil Procedure 65. She sought an order "to enjoin proceedings brought by the Defendants to place [her] attorney license on inactive disabled" status in violation of her First and Fourteenth Amendment rights. (D.I. 2 ¶ 14) On November 2, 2021, the Court denied Plaintiff's motion to expedite and letter/motion for emergency relief; dismissed as moot motions for a temporary restraining order and preliminary injunction, to e-file and to appear remotely; abstained under the Younger abstention doctrine; and dismissed the Complaint. (D.I. 16, 17)

On November 8, 2021, Plaintiff filed a motion for reargument (construed as a motion for reconsideration), followed by a motion to amend the motion for reargument, a

motion to amend Exhibit G to the Complaint, and a letter asking me to consider new evidence. (D.I. 20, 21, 23, 29) On December 22, 2021, this Court granted Plaintiff's motion to amend the motion for reargument, considered the amended reargument construed as a motion for reconsideration, did not consider evidence that did not exist when Plaintiff commenced this action on October 25, 2021, denied as moot Plaintiff's motion to amend Exhibit G of the complaint as it was already in the record, and denied Plaintiff's motion for reconsideration. (D.I. 30, 31)

On January 3, 2022, Plaintiff filed a notice of appeal of the December 22, 2021 Memorandum and Order. (D.I. 21) On January 11, 2022, Plaintiff filed a motion to waive PACER costs due to utter poverty. (D.I. 33) The same day she filed a motion to amend findings of fact and alter the December 22, 2021 Order to include the availability of new evidence not previously available, to correct clear errors of law and fact, and to prevent manifest injustice. (D.I. 34 at 1) The Court construes the filing as a motion for reconsideration of the December 22, 2021 order denying Plaintiff's motion for reconsideration.

On January 14, 2022, the United State Court of Appeals for the Third Circuit in *Kelly v. Disciplinary Counsel Swartz*, No. 21-3198 at docket item 22 (3d Cir.) stayed the appeal pending this Court's decision on the motion to amend pursuant to Fed. R. Civ. P. 52 and 59 filed on January 11, 2022. (*See* D.I. 34) Since then, Plaintiff has filed: (1) a third emergency motion to alter and amend the December 22, 2021 judgment pursuant to Fed. R. Civ. P. 52(b), 59(e), 60(b)(1), (2), and (6), and 65 (D.I. 36); (2) an emergency motion for immediate relief requesting review of motion filed simultaneously herewith

(D.I. 37); (3) a second additional motion pursuant to Fed. R. Civ. P. 52(b), 59(e), and 60(b)(1), (2), and (6) to amend findings of facts and alter the order dated December 22, 2021 based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice (D.I. 39); (4) a third emergency motion pursuant to Fed. R. Civ. P. 52(b), 59(e), 60(b)(1), (2), and (6), and 65 (D.I. 41); (5) an emergency motion for immediate relief requesting review of motion filed simultaneously herewith (D.I. 42); (6) a motion for an urgent emergency preliminary restraining order to be applied immediately with a waiver of bond to prevent immediate and irreparable injury by compelled violations of my religion but for my exercise of religious belief (D.I. 47); (7) a motion to expedite (D.I. 48); and (8) a different motion for exemption to appear in person in court, for remote proceedings or to appear remotely due to foreseeable costs relating to transportation creating a substantial burden upon plaintiff's access to the courts and forced violation of her religious beliefs by threat of indebtedness (D.I. 54).

II. DISCUSSION

Plaintiff seeks relief under Rule 52(b) and 59(e). A motion under Rule 52(b) or 59(e) is the functional equivalent of a motion for reconsideration. *Butamax Advanced Biofuels LLC v. Gevo Inc.*, 2015 WL 4919975, at *1, (D. Del. Aug. 18, 2015). Federal Rule of Civil Procedure 52(b) provides that, no later than 28 days after the entry of judgment, a party may move to have the court "amend its findings – or make additional findings," and the Rule 52(b) motion may accompany a motion for new trial under Rule 59. Rule 52(b) "permits [a party] to ask the court to correct, on the non-jury record before it, any errors of law, mistakes of fact or oversights that require correction." *U.S.*

Gypsum Co. v. Schiavo Bros., Inc., 668 F.2d 172, 180 (3d Cir. 1981). Factual determinations are correctable under Rule 52(b) if the district judge who heard the evidence believes that they are necessary, and capable of being made without the grant of a new trial. *U. S. Gypsum Co. v. Schiavo Bros.*, 668 F.2d 172, 180 n.9 (3d Cir. 1981)

A motion for reconsideration/amendment of judgment filed pursuant to Federal Rule of Civil Procedure 59(e) is "a device to relitigate the original issue decided by the district court, and [it is] used to allege legal error." *United States v. Fiorelli*, 337 F.3d 282, 288 (3d Cir. 2003). The moving party must show one of the following in order to prevail on a Rule 59(e) motion: (1) an intervening change in the controlling law; (2) the availability of new evidence that was not available when the court issued its order; or (3) the need to correct a clear error of law or fact or to prevent a manifest injustice. *Max's Seafood Café v. Quinteros*, 176 F.3d 669, 677 (3d Cir. 1999). A motion for reconsideration is not appropriate to reargue issues that the court has already considered and decided. *Brambles USA Inc. v. Blocker*, 735 F. Supp. 1239, 1240 (D. Del. 1990).

Having reviewed Plaintiff's filings as well as the applicable law, the Court concludes that Plaintiff has failed to demonstrate any of the necessary grounds to warrant a reconsideration of the Court's December 22, 2021 Order. Therefore, all motions pertaining to the motion for reconsideration of the December 22, 2021 Order will be denied. (D.I. 34, 36, 37, 39, 41, 42)

In addition, the Court will deny all other motions filed by Plaintiff subsequent to

the filing of her notice of appeal. (D.I. 33, 47, 48, 54)

III. CONCLUSION

For the above reasons, the Court will deny Plaintiff's motions. (D.I. 33, 34, 36, 37, 39, 41, 42, 47, 48, 54)

An appropriate order will be entered.

April 26, 2022
Wilmington, Delaware

Chief Judge

Appendix L

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

MEGHAN KELLY, Plaintiff, v. DISCIPLINARY COUNSEL PATRICIA B. SWARTZ, et al., Defendants.	Civ. No. 21-1490-CFC

MEMORANDUM ORDER

At Wilmington this Twenty-eighth day of December 2022, having considered Plaintiff's motions (D.I. 61, 62, 63, 65, 66, 69, 77, 80, 81, 82, 83, 85, 95, 96), IT IS HEREBY ORDERED that:

1. *Pro se* Plaintiff Meghan Kelly is a Delaware attorney. This case concerns her license to practice law in the State of Delaware. Plaintiff sought an order "to enjoin proceedings brought by the Defendants to place [her] attorney license on inactive disabled" status in violation of her First and Fourteenth Amendment rights. (D.I. 2 ¶ 14) On November 2, 2021, the Court denied Plaintiff's motion to expedite and letter/motion for emergency relief, dismissed as moot motions for a temporary restraining order and preliminary injunction and to e-file and appear remotely, abstained under the Younger abstention doctrine, and dismissed the Complaint. (D.I. 16, 17) Plaintiff filed notices of appeal on November 14, 2021 (USCA Case No. 21-3198) (D.I. 25), January 3, 2022 (D.I. 32), and May 9, 2022 (USCA No. 22-2079) (D.I. 67). The appeals were joined by the United States Court of Appeals for the Third Circuit with appeal No. 21-3198 as the lead case.

2. Plaintiff was granted *in forma pauperis* status in this case on October 28, 2021. (D.I. 15) The Court takes judicial notice that at one time, Plaintiff had PACER rights as an attorney. Plaintiff's PACER rights were suspended when her license was placed on inactive disabled status.

3. Plaintiff now seeks e-filing rights. (D.I. 83) That motion is **GRANTED**.

4. Plaintiff also requests a waiver of PACER fees associated with filing electronically in this Court (D.I. 62) and moves to amend that motion (D.I. 63). The motion to amend the request for waiver is **GRANTED**. (D.I. 63) The motion for a waiver of PACER fees is **GRANTED IN PART**. (D.I. 62) The United States Court of Appeals for the Third Circuit granted Plaintiff, as a non-attorney, a waiver of PACER fees. *See* Case No. 21-3198 at D.I. 30. In order for a waiver to be granted, a party must first have a PACER account. When a court grants a request to waive PACER fees, the Court must provide PACER with the account number to which the exemption applies and set a duration of time for the exemption. It may be that Plaintiff already has a PACER account. If she does not have a PACER account, she shall set one up. Either way, Plaintiff shall file a renewed motion for a PACER exemption in this Court, and in the motion she shall advise the Court of the PACER account number to which she wishes the exemption to apply along with a proposed duration of the exemption. Plaintiff shall file the renewed motion on or before **January, 20, 2023.**

5. Plaintiff's remaining motions are **DENIED** as they were filed subsequent to the first notice of appeal. (D.I. 61, 65, 66, 69, 77, 80, 81, 82, 85, 95, 96)

6. With the exception of a renewed motion for PACER exemption, Plaintiff is placed on notice that future filings in this Court during the pendency of Plaintiff's

appeals before the United States Court of Appeals for the Third Circuit will be docketed and not considered.

Chief Judge

Appendix M

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

MEGHAN KELLY, Plaintiff, v. DISCIPLINARY COUNSEL PATRICIA B. SWARTZ, et al., Defendants.	: Civ. No. 21-1490-CFC

ORDER

At Wilmington this 5th day of January 2023, having considered Plaintiff's renewed motion for an exemption to PACER (D.I. 108);

IT IS HEREBY ORDERED that Plaintiff's renewed motion is **GRANTED**. (D.I. 108) Plaintiff Meghan Kelly PACER Account No. 6975241 shall be exempt from the payment of fees for access via PACER to the electronic case files maintained in the United States District Court for the District of Delaware in Civil Action Number 21-1490-CFC, only. This exemption shall be applied nunc pro tunc to October 25, 2021. This exemption may be revoked at the discretion of the Court at any time. A copy of this Order will be forwarded to the PACER Service Center.

Chief Judge

Kelly v Swartz 21-1490/21-3198 USSC rejected Meg's service of appeal must come work week will not file or submit memory sticks

From: Meg Kelly (meghankellyesq@yahoo.com)

To: jbickell@supremecourt.gov; rmeek@supremecourt.gov

Cc: david.weiss@usdoj.gov; meghankellyesq@yahoo.com; zi-xiang.shen@delaware.gov; tmastro@gmail.com; iadams@sidley.com; supremectbriefs@usdoj.gov

Date: Sunday, March 10, 2024 at 12:04 PM EDT

Hi Danny and Robert Meek,

I left a voice message with Lisa Nesbitt indicating the USSC would not accept my documents when I attempted service upon them on Saturday March 9, 2024, the same day I served opposing counsel. Officer Johnson indicated they could not receive memory sticks.

Sgt. McBeth and Officer Johnson indicated they would not accept the documents even without the memory stick. He said to come back during the week to drop them off.

I had to change my certificate of service to indicate no memory sticks will be served upon the USSC and service was not complete upon the US Supreme Court on March 9, 2024 as my previous certificate averred.

I have to drop off pleading to the US Supreme Court since poverty creates a substantial burden to my access to the courts. I cannot afford to mail them and should not be denied Equal Protections applicable to the USSC via the 5th Amendment's Equal Protections component based on poverty and asserted my 1st Amendment asserted rights to religious belief and exercise of religious belief and 13th Amendment right not to be enslaved to sin and I believe death in hell for the vanity of men by making money God and savior through indebtedness.

I have religious beliefs against debt. I believe people go to hell for oppressing to enslave people to their will by debt. I believe people sin by depriving people of life and liberty for sinful desire for convenience, avoidance of costs, profit position and such for themselves or others. I believe that is the mark of lawlessness leading to lose of eternal life in the fires of hell should people not clean their mind, heart and hands of such lawlessness in the eyes of God. My religious objection to making money and materiel gain God tempting people to sacrifice other people's lives and liberties our Supreme law avers to protect are genuine.

Ironically the manner money is coined is the problem that will allow for an overthrow of our government through the new carbon credit debit scheme sometime after 2050 if the courts do not stop it. Money is coined out of debt, indebting the government to pay back what does not exist plus interest to the federal reserve. Money is a tool of slavery not freedom by the lawless manner it is coined. The government is tempted to enslave the people to pay off debt it artificially and unnaturally allows the creation of through the federal reserve and on a lesser level the banks. The governments job is to protect life, liberty and property of the people, not to enslave and sacrifice the people to serve business greed by eliminating every freedom unnaturally.

I believe people go to hell for selling money at a profit too. See, Ezekiel 18:13 ("He lends at interest and takes a profit. Will such a man live? He will not! Because he has done all these detestable things, he is to be put to death [meaning the second death no eternal life in the fires of hell]; his blood will be on his own head.") I understand that our entire system is based on selling debt, but I reserve the right to believe differently and to argue a way to protect people's freedom from slavery by the elimination of the Constitutional rule of law that restrains private and public entities and individuals from oppressing to control and harm people to bend their will to those who control the resources.

I copy my two little cousins in case I need a place to stay in DC because I am tired and had late nights and early mornings in my failed attempt to effectuate service upon this US Supreme Court on Saturday.

They do not know of my private litigations or beliefs and exercised of religious beliefs I assert and seek to protect.

The right to petition not the right to vote is the only individual liberty and the power of law the Constitution grants citizens upon the government which should not be removed by the government to leave the government unchecked.

In Acts Chapter 22 the apostle Paul was about to be stoned before a Centurian discovered he was a Roman. His right to petition coupled with Due process is what safeguarded his life and liberty. Whereas Jesus was not protected as a nonRoman and was subjected to mob rule where he died while not committing a law worthy of death per Pontius Pilate. See, Luke 23:22-24 Pilate indicating "He has done nothing wrong warranting death…. But they were insistent, demanding with loud voices for Jesus to be crucified. And their clamor prevailed. 24So Pilate sentenced that their demand be met…").

I disagree with the founders' philosophies because I disagree with the enlightenment thinkers they relied upon who taught men and men's desires and creation were God master and the law. The Founders relied on Enlightenment thinkers who taught men, their creation, and their desires, alleged natural laws are their master and guide. See Romans 1:25 I believe the natural man is without eternal life. I believe we are all born enslaved to lawless lusts called sin in need of being born again into eternal life to escape the second death in hell. The natural man lives based on desires to be enslaved by those who tempt his desires not free. The spiritual man lays down his desires to discern what is right and does not give into temptation to be controlled by those who entice his desires by reward or threat of harm. The spiritual man seeks to overcome lusts to love unconditionally required by respecting the dignity of others. Thankfully the Const and statutory laws are the law, not imperfect fallible men who decreed traditions which violate the purpose of the law to protect life and liberty, not sacrifice them for the whimsical desires, convenience, profit, avoidance of costs, or other vanity of men.

I believe we have something more just than a republic. We have a democratic -republic where the courts are the only branch that safeguards individual liberty and lives from being sacrifice through the collective representation of the people through the other two branches representation.

The Courts give us the opportunity to petition to secure freedom. The Courts grant us a democracy. Whereas the other two branches grant as representation and a republic. As a Christian justice in the courts is a religious exercise for me. I believe the courts cannot only save lives, preserve freedom, but they can also save eternal lives from the fires of hell too. See Amos 5:15, Matt 23:23.

I recognize that all 9 justices believe differently than I. I still have the right to petition to persuade them to consider they are in error or at least to protect my freedom to religious beliefs.

The Constitution lawfully vests legal power in the governments' three branches and in the people themselves to place checks on the government to prevent the government from eliminating the law as applied to the government.

The United States is founded based on the Constitution as rule of law, and is maintained and sustained by the rule of law. The power of the government and the power of the people including the 1st Amendment right to pet coupled with 5th and 14th Amendment right to fair opportunity to be heard is based on the rule of law, the Constitution, which sustains and maintains these United States. Petitioning is the only individual liberty that safeguards every other Constitutionally protected individual liberty and claim without compromise or vitiation for the collective representative interest by the vote.

I believe the Enlightenment thinkers and founding father theorists are wrong in that the power of the Government and the People rests NOT in the will of the people by those who teach the vote is a collective social contract or compromised representative agreement and bartered for exchange for the souls of people to sell for government agents to pay for power and profit eliminating freedom by deception money is freedom when it is coined to enslave and whether the manner Presidents Lincoln, Kennedy I proposed to coin lawfully in accordance with the US Amend I, V, XIII, XIV may be used to sustain these Unites States while safeguarding not infringing on freedoms from schemed overthrow. Please see the 93rd Aff I filed in the PA case with regards to funding the courts please.

I am really concerned that my access to the courts may have been insidiously obstructed by the US Supreme Court based on partial whims of convenience or worse.

So I alert you as I attempt to cure deprivations before I drive to the Court before the deadline March 12, 2024.

When I petition to correct court deprivations it is never to destroy the court but to preserve my rights and the laws that maintains and sustains these United States.

Please forgive typos. I am a poor typist and write in haste to assert rights, so they are not infringed upon even by the

US Supreme Court.

Thank you,
Meg
Meghan Kelly 34012 Shawnee Dr
Dagsboro, DE 19939
PS I seek to protect the courts in my petitions if you read them. You will see I believe the courts meaning all of us are in danger. Since you are the only branch that give us freedom. :(You must here petitions to save yourself. It matters not so much whether you agree or disagree with me. It matters more whether the courts sustain their power to say what the rule of law is before others do and the scheme to eliminate them after 2050 is not prevented. :(If the courts mess up do not despair. The people's power to petition gives them away to change course through distinguished cases. That check even upon the courts make our nation more just and fairer.
Guess what? No one agrees with my beliefs. My parents don't. I still love them and will still respect you and seek to protect Courts even when I seek to correct them below.

From: Meg Kelly <meghankellyesq@yahoo.com>
To: Zi-xiang Shen <zi-xiang.shen@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>; Robert Meek <rmeek@supremecourt.gov>; "david.weiss@usdoj.gov" <david.weiss@usdoj.gov>
Sent: Saturday, March 9, 2024 at 03:04:40 PM EST
Subject: Meg is at the us sure court emergency

Hi Robert meek,

I am at the us Supreme Court now.

I was told they accepted documents 24 hours even on Christmas.

They are not accepting my documents now, even though they accepted a similar amount of boxes when it was closed on Dec 25-26

I drove here and it took more than 2-3 hours.
Can you please help me now if possible before I go

Thank you
Meg

Sent from my iPhone

IMG_3949.jpg
683.2kB

IMG_3951.jpg
586.5kB


IMG_3952.jpg
750.4kB


IMG_3953.jpg
553.8kB


IMG_3954.jpg
928.1kB

Kelly v Swartz Meg Kelly received one box with cert of service two appendices with a letter in error from Robert Meek dated March 13 2024 Fw: Correspondence from The Supreme Court of the United States

From: Meg Kelly (meghankellyesq@yahoo.com)

To: rmeek@supremecourt.gov

Cc: lnesbitt@supremecourt.gov; jbickell@supremecourt.gov; zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov; supremectbriefs@usdoj.gov; anthony.sodroski@pacourts.us; harriet.brumberg@pacourts.us; meghankellyesq@yahoo.com

Date: Friday, March 15, 2024 at 03:46 PM EDT

Hi Robert Meek,

On Monday March 11, 2024 I submitted 11 boxes labeled IFP, 11 boxes labeled IFP 2, 11 boxes labeled Appendix, 1 box with an original and 10 copies of the petition for writ of cert I think I labeled appeal in pen as opposed to marker, one brown envelop with corrected certificate of services for a total of 35 separate mail containers.

I received one of the appendix boxes back today with two believed copies of the appendix and the certificate of services, which were in the brown envelop.

Along with it I received a letter in error from you attached hereto and dated 3/14/2024 with the 2 appendices where you note the application is out of time.

I filed a petition for writ of cert on Monday, not an application. This was sadly was denied with 60 days leave to cure defects per the email below.

Per the attached letter dated 1/12/24 I was required to file this by or before 3/13/24. I drove to the US Supreme Court on Saturday May 11, 2024 and presented it for filing as I have done every prior time I filed in person when the offices were closed. As I noted in the corrected certificate of service Officer Johnson and Sgt McBeth requested I come back during the week. They indicated they would not file it as the Capitol police has done every other time I presented documents in person after hours.

I complied. I was too scared to miss the deadline that I drove early in the morning and arrived and timely on March 11, 2024, and filed the petition.

Lisa Nesbitt spoke with me and indicated I may draw on the appendix letters. Since the appendix fr the Motion to file In forma Pauperis is larger than the pet for writ I am labeling them "A IFP", "B IFP" to prevent confusion between the two items.

In the corrected certificate of service I noted averred

"However, Sgt McBeth and Officer Johnson, said they could not accept any digital date, nor could they accept any of pleadings on March 9, 2024.

They requested I come in during the week. They also said they could not receive electronic data with the filing.

So, the US Supreme Court will not have the electronic memory stick the DE District Court sent to the Third Circuit which is identical to the information contained on the memory stick I sent opposing counsel despite the fact I incorporated it into my appeal. They cannot review it.

To confirm, I drove from my home in the early afternoon and arrived back after 6:00 PM. I was unsuccessful in service to the US Supreme Court today March 9, 2024. I am not going to provide the electronic data herewith upon service.

Please find proof of attempts to serve and pictures I verify in good faith.

Poverty creates a substantial burden upon my access to the courts. I cannot afford to mail in documents due to Defendants 'preventing me from seeking to return to my former law firm for the job of my choice and assert US Amend XIII with regards to involuntary servitude. So, I must physically drop documents off since poverty creates a substantial burden to my access to the courts. I also have religious objections to debt. I believe go to hell seeking money, avoidance of costs and convenience for themselves to care for their own or the convenience of others at the exchange of enslaving or oppressing others or harming other people's health or life for profit, especially research and science. I believe most people go to hell per Jesus. Matthew 7:13-15, Luke 13:23-28. I believe correction in court may save lives of the victims and the eternal souls of the wrongdoers by correction to help the blind see and the dumb hear. Upholding justice is a religious command. Amos 5:15 and Matthew 23:23, and to persist like the pestering widow who petitioned an unjust judge over and over again until he granted her relief ti get rid of her. Luke 18:1-8.

I assert my 1st Amendment right to religious belief in Jesus, 1st Amendment right to exercise my religious beliefs, my 1st Amendment right to speech in my petitions, and my 1st Amendment right to petition, 5th Amendment due process protections to be heard fully and fairly by this Court without insidious partiality to the government as opposed to the impartial application of the Constitution to the rule of law by the government including this US Supreme Court in accordance with the 5th Amendment's due process component. I reserve my right to be separate, holy and not conformed to the wicked vanity of other people to lose my soul in hell."
I assert my 1st Am right to petition and 5th Am amendment right to due process to be heard fairly and fully on the petition before the government vitiates my life, liberty or property interests including but not limited to the right to petition. The 1st Am rt to petition protects the rt to access to the courts to complain to the gov including this court without fear of punishment.

The 1st Amendment right to petition combined with the 5th and 14th Am rt to due process is the cornerstone of a government of, by and for the people. The power of the government and the power of the people including the 1st Am rt to pet is based on the rule of law, the Constitution, which sustains and maintains these United States. The power of the government is NOT based on the will of the people.It is based on Constitutional law. Petitioning is the only individual liberty that safeguards every other Constitutionally protected individual liberty and claim without compromise or vitiation for the collective representative interest by the vote. The vote is a tool of oppression eliminating individual liberties **if not restrained** by the courts to serve mob rule as opposed to the impartial application of the Constitution to the rule of law.

The judiciary is the most important branch since it protects individuals and individual liberty and grants us a democracy in our democratic republic. Without you there is no freedom just lawless reign by those with power, connections or wealth unrestrained by love or just law from oppressing, killing, stealing or destroying human life, health or liberty for vain material gain. That makes court staff and courts irreplaceable.

Yet no one should be denied access to the courts disparately as that is a denial of freedom by making some citizens unprotected by the laws. Moreover the courts have no power should no one petition in a case or controversy. I believe the courts are in trouble. When I petition to preserve my claims and preserve the rule of law it is never to destroy those who allegedly err.Mistakes happen, and Constitutional defects occur which make court staff invaluable and necessary to uphold the fair administration of justice.

Most filings I submitted to this highest court indicated my belief the US Supreme Court is in trouble. All courts are in trouble. Yet this court has denied all petitions for writ of cert I in good faith submit. I do not seek to destroy this court but to save it and our country from dissolution by allowing the dissolution of the rule of law that created, sustains and maintains these US. It is the Constitution, the law, not the will, or trendy fads that sustains this country. That makes you special.

Nevertheless, I should not be deprived of access to the courts because the court is scared of accepting petitions to correct mistakes I allege it makes, including the 11/6/236 petition in the PA appeal (I have to copy PA counsel), and the 1/23/24 petitions which were neither accepted nor rejected or returned in conformity with this court's rules or case law. :(Please forgive typos. I am a poor typist.

Have a good weekend. On a side note, talking to Lisa Nesbitt for two minutes alleviates a lot of confusion and needless heartache. I want to specially thank her for her time and importance in helping me and others.

I believe the entities I used to work on in my first law firm ever in Delaware will be used for criminal purpose of reselling bad debt by the banks to allow a crash to allow for a foundation to jeopardize national security down the line. The way bankruptcy remote entities work is by contract law once the managing member dissolves by bankruptcy or dissolution a spinging member hops in simultaneously to allow the reselling of bad debt to gain debt control oer the government and the people into infinity. The ABA has an article praising these entities, but I believe they will be used to overthrow the

government after 2050 if the courts are not our hero to stop it. Yet, the courts keep squishing me like a bug. I seek to save the courts not destroy them. I cry as I type this.

Thank you for your time and help.

Thank you,
Meg
Meghan Kelly
34012 Shawnee Dr
Dagsboro, DE 19939

----- Forwarded Message -----
From: "no-reply@supremecourt.gov" <no-reply@supremecourt.gov>
To: "meghankellyesq@yahoo.com" <meghankellyesq@yahoo.com>
Sent: Thursday, March 14, 2024 at 12:10:08 PM EDT
Subject: Correspondence from The Supreme Court of the United States

SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001

March 14, 2024

Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

RE: Kelly v. Swartz, et al.
USCA3 No. 21-3198
No: 23a100

Dear Ms. Kelly:

The above-entitled petition for writ of certiorari was received March 11, 2024. The papers are returned for the following reason(s):

The cover of the petition must bear the correct title of the document ("Opening Brief...etc." should not appear on the cover). Rule 34.1(e). You may use the enclosed sample cover as a guide.

The questions presented for review should be short, concise and not argumentative, repetitive or contain unnecessary details. Rule 14.1(a).

The petition fails to comply with the content requirements of Rule 14, in that the petition does not contain:

The reasons relied on for the allowance of the writ. Rules 10 and 14.1(h).

Please correct and resubmit as soon as possible. Unless the petition is submitted to this Office in corrected form within 60 days of the date of this letter, the petition will not be filed. Rule 14.5.

A copy of the corrected petition must be served on opposing counsel.

When making the required corrections to a petition, no change to the substance of the petition may be made.

Sincerely,
Scott S. Harris, Clerk
By:

Lisa Nesbitt
(202) 479-3038

pics of mailing letter Robert Meek and Lisa.pdf
4.6MB

cert of service with correction cannot give electronic data and service rejected by USSC march 9 2024.pdf
13.6MB

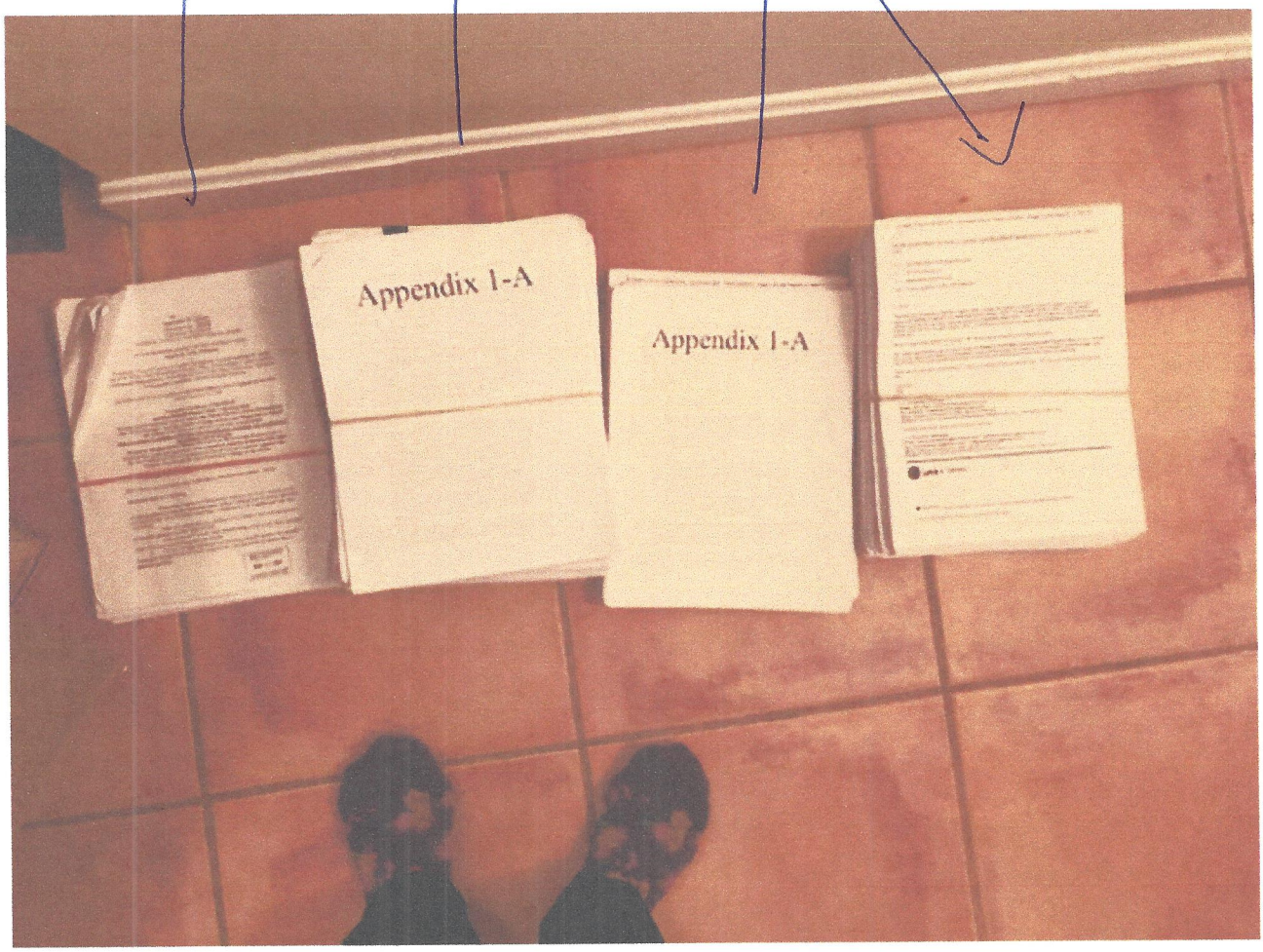
P


P
COMMERCIAL BASE PRICING
USPS PRIORITY MAIL
SHIP TO:
DAGSBORO DE 19939
USPS TRACKING #
9205 5902 4503 3600 0009 3839 63
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LRRB July 2022
ID: 12 x 11.75 x 5.5
OD: 12.25 x 12 x 6
OBCUFT: 0.510

Correct.)
Cert 1 Set

1 Copy

2nd Copy



No. _____
Application No. 23A361
Application No. 23A100
Application No. 22A747
Related No. Petition for Cert before Judgment 22-6783

IN THE SUPREME COURT OF THE UNITED STATES
Meghan M. Kelly, Petitioner
v.
Disciplinary Counsel Patricia B. Swartz, Disciplinary Counsel Kathleen M. Vavala; David A. White, Chief Disciplinary Counsel, Office of Disciplinary Counsel, Board on Professional Responsibility of the Supreme Court of the State of Delaware, Preliminary Investigatory Committee, Attorney General Delaware

On Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit Case No 21-3198

Corrected Certificate of Service of
Appellant Plaintiff Meghan Kelly's Opening Brief
moving the US Supreme Court to vacate the Third Circuit's Orders dismissing the case under Younger, denying recusals of Judge Scirica and Phipps and to remand the matter to the Delaware District Court for consideration
This Corrective Certificate of Service with attachments, including but not limited to the original Cert of Service
Petitioner Meghan Kelly's Motion for Leave to file in Forma Pauperis and to Exempt fees, taxes and costs to prevent compelled vitiation of fundamental rights for her Petition for Writ of Certiorari of Third Circuit Court of Appeals Case Number 21-3198 and for all of Petitioner's filings in this matter

I, Appellant Plaintiff Meghan M. Kelly, Esquire, hereby certify that on March 9, 2024, I had a true and correct copy of the above referenced documents, and the **electronic data** on it including,

1. Video where I spoke at a Democratic function, showing I misbehaved by accepting donations from the Democratic party before I learned how it caused oppression and injustice per Jesus the Christ's teachings in Matthew 6:1-4. I sinned and I am sorry your honor.
2. Video of a vulture that was pecking at the window that was not scared of me despite yelling at it in the winter of 2022.
3. Video of me on TV in the news complaining of rats in my dorm apartment from a Christian School Duquesne Law School.
4. Pictures of Judge Hardiman and me in law school, to show my personal connection to argue he should not be assigned the case should he be chosen due to potential partiality.

RECEIVED
MAR 12 2024
OFFICE OF THE CLERK
SUPREME COURT, U.S.

SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001

March 13, 2024

Pet for writ of cert
Not application

Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

RE: Kelly v. Swartz
CA3 21-3198

Dear Ms. Kelly:

Your application "to vacate the Third Circuit order..." received March 12, 2024 is herewith returned for the following reason(s):

The application is out of time. The date of the lower court judgment or order denying a timely motion for reconsideration was July 10, 2023. Therefore, the application and any interlocutory petition for a writ of certiorari were due on or before November 13, 2023. Rules 13.1, 29.2, and 30.1. When the time to file a petition for a writ of certiorari in a civil case has expired, the Court no longer has the power to review the petition or any related applications for stay or injunctive relief. See 28 U.S.C. 1651 and 2101(f).

Sincerely,
Scott S. Harris, Clerk
By:

Robert Meek
(202) 479-3027

Enclosures

SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001

January 12, 2024

By March 13

Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

RE: Kelly v. Swartz, et al.
(23A361)
No: 23A100

Dear Ms. Kelly:

The above-entitled petition for writ of certiorari was received October 18, 2023. The papers are returned for the following reason(s):

The petition exceeds the limit of 40 pages allowed. Rule 33.2(b).

Please correct and resubmit as soon as possible. Unless the petition is submitted to this Office in corrected form within 60 days of the date of this letter, the petition will not be filed. Rule 14.5.

A copy of the corrected petition must be served on opposing counsel.

When making the required corrections to a petition, no change to the substance of the petition may be made.

Sincerely,
Scott S. Harris, Clerk
By:

Lisa Nesbitt
(202) 479-3038

Enclosures

Correspondence from The Supreme Court of the United States

From: no-reply@supremecourt.gov

To: meghankellyesq@yahoo.com

Date: Thursday, March 14, 2024 at 12:10 PM EDT

Meg's Petition was sadly rejected with 60 days to cure by May 13 2024 :(

SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001

March 14, 2024

Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

RE: Kelly v. Swartz, et al.
USCA3 No. 21-3198
No: 23a100

Dear Ms. Kelly:

The above-entitled petition for writ of certiorari was received March 11, 2024. The papers are returned for the following reason(s):

The cover of the petition must bear the correct title of the document ("Opening Brief...etc." should not appear on the cover). Rule 34.1(e). You may use the enclosed sample cover as a guide.

The questions presented for review should be short, concise and not argumentative, repetitive or contain unnecessary details. Rule 14.1(a).

The petition fails to comply with the content requirements of Rule 14, in that the petition does not contain:

The reasons relied on for the allowance of the writ. Rules 10 and 14.1(h).

Please correct and resubmit as soon as possible. Unless the petition is submitted to this Office in corrected form within 60 days of the date of this letter, the petition will not be filed. Rule 14.5.

A copy of the corrected petition must be served on opposing counsel.

When making the required corrections to a petition, no change to the substance of the petition may be made.

Sincerely,
Scott S. Harris, Clerk
By:

Lisa Nesbitt
(202) 479-3038

Meg is working on labeling Exhibits for IFP and the Pet. per Case manager's instructions

A IFP

IFP means In forma pauperis Appendix not the Appendix for Writ of Cert

I hope this is Okay.

No.

IN THE

SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly
(Your Name) — PETITIONER

VS.

Disciplinary Counsel Patricia B Swartz, et al — RESPONDENT(S)

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Please check the appropriate boxes:

☐ Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s): Third Circuit Court of Appeals No. 21-1455, 22-1012 DE District Court No. 21-1496, DE Chancery Court No. 20-0509, 2020-0167, DE Supreme Court No. 119-2021

☐ Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

☑ Petitioner's affidavit or declaration in support of this motion is attached hereto.

☐ Petitioner's affidavit or declaration is **not** attached because the court below appointed counsel in the current proceeding, and:

☐ The appointment was made under the following provision of law: _____, or

☐ a copy of the order of appointment is appended.

Meghan M. Kelly
(Signature)

No. _____
Application No. 23A361
Application No. 23A100
Application No. 22A747
Related No. Petition for Cert before Judgment 22-6783

IN THE SUPREME COURT OF THE UNITED STATES
Meghan M. Kelly, Petitioner
v.
Disciplinary Counsel Patricia B. Swartz, Disciplinary Counsel Kathleen M. Vavala; David A. White, Chief Disciplinary Counsel, Office of Disciplinary Counsel, Board on Professional Responsibility of the Supreme Court of the State of Delaware, Preliminary Investigatory Committee, Attorney General Delaware

On Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit Case No 21-3198

Corrected Certificate of Service of
Appellant Plaintiff Meghan Kelly's Opening Brief
moving the US Supreme Court to vacate the Third Circuit's Orders dismissing the case under Younger, denying recusals of Judge Scirica and Phipps and to remand the matter to the Delaware District Court for consideration
This Corrective Certificate of Service with attachments, including but not limited to the original Cert of Service
Petitioner Meghan Kelly's Motion for Leave to file in Forma Pauperis and to Exempt fees, taxes and costs to prevent compelled vitiation of fundamental rights for her Petition for Writ of Certiorari of Third Circuit Court of Appeals Case Number 21-3198 and for all of Petitioner's filings in this matter

I, Appellant Plaintiff Meghan M. Kelly, Esquire, hereby certify that on March 9, 2024, I had a true and correct copy of the above referenced documents, and the **electronic data** on it including,

1. Video where I spoke at a Democratic function, showing I misbehaved by accepting donations from the Democratic party before I learned how it caused oppression and injustice per Jesus the Christ's teachings in Matthew 6:1-4. I sinned and I am sorry your honor.
2. Video of a vulture that was pecking at the window that was not scared of me despite yelling at it in the winter of 2022.
3. Video of me on TV in the news complaining of rats in my dorm apartment from a Christian School Duquesne Law School.
4. Pictures of Judge Hardiman and me in law school, to show my personal connection to argue he should not be assigned the case should he be chosen due to potential partiality.

5. Pictures of me attending a Democratic function, misbehaving, when I should have been available to all people, regardless of party to prevent conditional conformity with the party's agenda, which prevents unconditional love and service for all citizens, regardless of each individual's position and party affiliation.

6. Video of me lamenting about how Nancy Pelosi and congress people misbehaved by failing to impeach.

7. PDF's of the pleadings I filed against the democrats, suing them without violating Jesus Christ's teachings by asking for donations or signatures, which I believe damns people to hell.

8. I also attached some of my marketing material, sent to all Defendants through their attorney, via U.S. mail on 3/9/24

Zi-Xiang Shen
Delaware Department of Justice
Carvel State Building 820 N. French St. 6th Floor
Wilmington, DE 19801

I attempted to serve the US Supreme Court the above referenced documents by physical delivery of the above referenced documents and served **electronic data** on 11 brand new memory sticks, also known as flash drives, USB flash drives or USB sticks herewith to the Clerk of the US Supreme Court simultaneously as I attempted to serve the original documents the above referenced documents therewith, at the following address:

Clerk's Office
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

However, Sgt McBeth and Officer Johnson, said they could not accept any digital data, nor could they accept any of pleadings on March 9, 2024.

They requested I come in during the week. They also said they could not receive electronic data with the filing.

So, the US Supreme Court will not have the electronic memory stick the DE District Court sent to the Third Circuit which is identical to the information contained on the memory stick I sent opposing counsel despite the fact I incorporated it into my appeal. They cannot review it.

To confirm, I drove from my home in the early afternoon and arrived back after 6:00 PM. I was unsuccessful in service to the US Supreme Court today March 9, 2024.

I am not going to provide the electronic data herewith upon service.

Please find proof of attempts to serve and pictures I verify in good faith.

Poverty creates a substantial burden upon my access to the courts. I cannot afford to mail in documents due to Defendants 'preventing me from seeking to return to my former law firm for the job of my choice and assert US Amend XIII with regards to involuntary servitude. So, I must physically drop documents off since poverty creates a substantial burden to my access to the courts. I also have religious objections to debt. I believe go to hell seeking money, avoidance of costs and convenience for themselves to

care for their own or the convenience of others at the exchange of enslaving or oppressing others or harming other people's health or life for profit, especially research and science. I believe most people go to hell per Jesus. Matthew 7:13-15, Luke 13:23-28. I believe correction in court may save lives of the victims and the eternal souls of the wrongdoers by correction to help the blind see and the dumb hear. Upholding justice is a religious command. Amos 5:15 and Matthew 23:23, and to persist like the pestering widow who petitioned an unjust judge over and over again until he granted her relief toi get rid of her. Luke 18:1-8.

I assert my 1st Amendment right to religious belief in Jesus, 1st Amendment right to exercise my religious beliefs, my 1st Amendment right to speech in my petitions, and my 1st Amendment right to petition, 5th Amendment due process protections to be heard fully and fairly by this Court without insidious partiality to the government as opposed to the impartial application of the Constitution to the rule of law by the government including this US Supreme Court in accordance with the 5th Amendment's due process component. I reserve my right to be separate, holy and not conformed to the wicked vanity of other people to lose my soul in hell.

March 9, 2024

Respectfully submitted,

Meghan Kelly

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 493-6693
meghankellyesq@yahoo.com
US Supreme Court Bar No. 283696

Under Religious objection I declare, affirm that the foregoing statement is true and correct

Dated: 3/9/2024

Meghan Kelly (printed)

Meghan Kelly (signed)

No. _____
Application No. 23A361
Application No. 23A100
Application No. 22A747
Related No. Petition for Cert before Judgment 22-6783

IN THE SUPREME COURT OF THE UNITED STATES
Meghan M. Kelly, Petitioner
v.
Disciplinary Counsel Patricia B. Swartz, Disciplinary Counsel Kathleen M. Vavala; David A. White, Chief Disciplinary Counsel, Office of Disciplinary Counsel, Board on Professional Responsibility of the Supreme Court of the State of Delaware, Preliminary Investigatory Committee, Attorney General Delaware

On Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit Case No 21-3198

Certificate of Service of
Appellant Plaintiff Meghan Kelly's Opening Brief
moving the US Supreme Court to vacate the Third Circuit's Orders dismissing the case under Younger, denying recusals of Judge Scirica and Phipps and to remand the matter to the Delaware District Court for consideration
Electronic Data
Petitioner Meghan Kelly's Motion for Leave to file in Forma Pauperis and to Exempt fees, taxes and costs to prevent compelled vitiation of fundamental rights for her Petition for Writ of Certiorari of Third Circuit Court of Appeals Case Number 21-3198 and for all of Petitioner's filings in this matter

I, Appellant Plaintiff Meghan M. Kelly, Esquire, hereby certify that on 3/9/2024, I had a true and correct copy of the above referenced documents, and the **electronic data** on a including,

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3. Video of me on TV in the news complaining of rats in my dorm apartment from a Christian School Duquesne Law School.
4. Pictures of Judge Hardiman and me in law school, to show my personal connection to argue he should not be assigned the case should he be chosen due to potential partiality.

5. Pictures of me attending a Democratic function, misbehaving, when I should have been available to all people, regardless of party to prevent conditional conformity with the party's agenda, which prevents unconditional love and service for all citizens, regardless of each individual's position and party affiliation.

6. Video of me lamenting about how Nancy Pelosi and congress people misbehaved by failing to impeach.

7. PDF's of the pleadings I filed against the democrats, suing them without violating Jesus Christ's teachings by asking for donations or signatures, which I believe damns people to hell.

8. I also attached some of my marketing material,

sent to all Defendants through their attorney,

Zi-Xiang Shen
Delaware Department of Justice
Carvel State Building 820 N. French St. 6th Floor
Wilmington, DE 19801

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3. Video of me on TV in the news complaining of rats in my dorm apartment from a Christian School Duquesne Law School.

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8. I also attached some of my marketing material, by sending the same to:

Clerk's Office
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

Respectfully submitted,

Dated 3/9/2024

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 493-6693
meghankellyesq@yahoo.com
US Supreme Court Bar No. 283696

Under Religious objection I declare, affirm that the foregoing statement is true and correct

Dated: 3/9/2024

Meghan Kelly (printed)

(signed)

UNITED STATES POSTAL SERVICE.

OCEAN VIEW
35764 ATLANTIC AVE
OCEAN VIEW, DE 19970-9998
(800)275-8777

03/09/2024 08:34 AM

Product	Qty	Unit Price	Price
USPS Grnd Advtg	1		$10.55
Wilmington, DE 19801			
Weight: 3 lb 9.70 oz			
Estimated Delivery Date			
Mon 03/11/2024			
Tracking #:			
9534 6149 9861 4069 3941 01			
Insurance			$0.00
Up to $100.00 included			
Affixed Postage			-$9.52
Affixed Amount: $9.52			
Total			$1.03
Priority Mail® Med FR Box	1		$18.40
Wilmington, DE 19801			
Flat Rate			
Expected Delivery Date			
Mon 03/11/2024			
Tracking #:			
9505 5149 9861 4069 3941 26			
Insurance			$0.00
Up to $100.00 included			
Affixed Postage			-$18.36
Affixed Amount: $18.36			
Total			$0.04
Priority Mail® Med FR Box	1		$18.40
Wilmington, DE 19801			
Flat Rate			
Expected Delivery Date			
Mon 03/11/2024			
Tracking #:			
9505 5149 9861 4069 3941 40			
Insurance			$0.00
Up to $100.00 included			
Affixed Postage			-$18.36
Affixed Amount: $18.36			
Total			$0.04
Grand Total:			$1.11
Cash			$1.11

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Save this receipt as evidence of insurance. For information on filing an insurance claim go to https://www.usps.com/help/claims.htm or call 1-800-222-1811

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Track your Packages
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https://informeddelivery.usps.com

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Tell us about your experience.
Go to: https://postalexperience.com/Pos

UNITED STATES POSTAL SERVICE.

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DAGSBORO, DE 19939-9998
(800)275-8777

03/09/2024 11:48 AM

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First-Class Mail® Letter	1		$0.68
Wilmington, DE 19801			
Weight: 0 lb 0.80 oz			
Estimated Delivery Date			
Mon 03/11/2024			
Affixed Postage			-$0.68
Affixed Amount: $0.68			
Total			$0.00
Grand Total:			$0.00

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All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

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Go to: https://postalexperience.com/Pos
or scan this code with your mobile device,

or call 1-800-410-7420.

UFN: 091430-0939
Receipt #: 840-50800226-2-1339188-2
Clerk: 96

21-1490 Kelly v Swartz Certificate of service to you dated March 9 mailed to you today too

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov

Cc: meghankellyesq@yahoo.com

Date: Saturday, March 9, 2024 at 10:00 AM EST

Zi-Xiang Shen,

Attached please find the cert of service for today March 9, 2024. I closed all the boxes yesterday and did not make it March 8, 2024.

If there is a March 8, 2024 please disregard it.

I was only able to mail it March 9, 2024. The certificate of Service is coming to you March 9 2024 in an envelop.

I attach a picture of the envelop and the certificate fo service and a postal receipt.

I am scared to drive up in the rain to DC since the court leaves the flings outside of the building in bags to be picked up later.

Tomorrow is super duper windy. I am a little cared of driving up there since I got a flat tire last time.

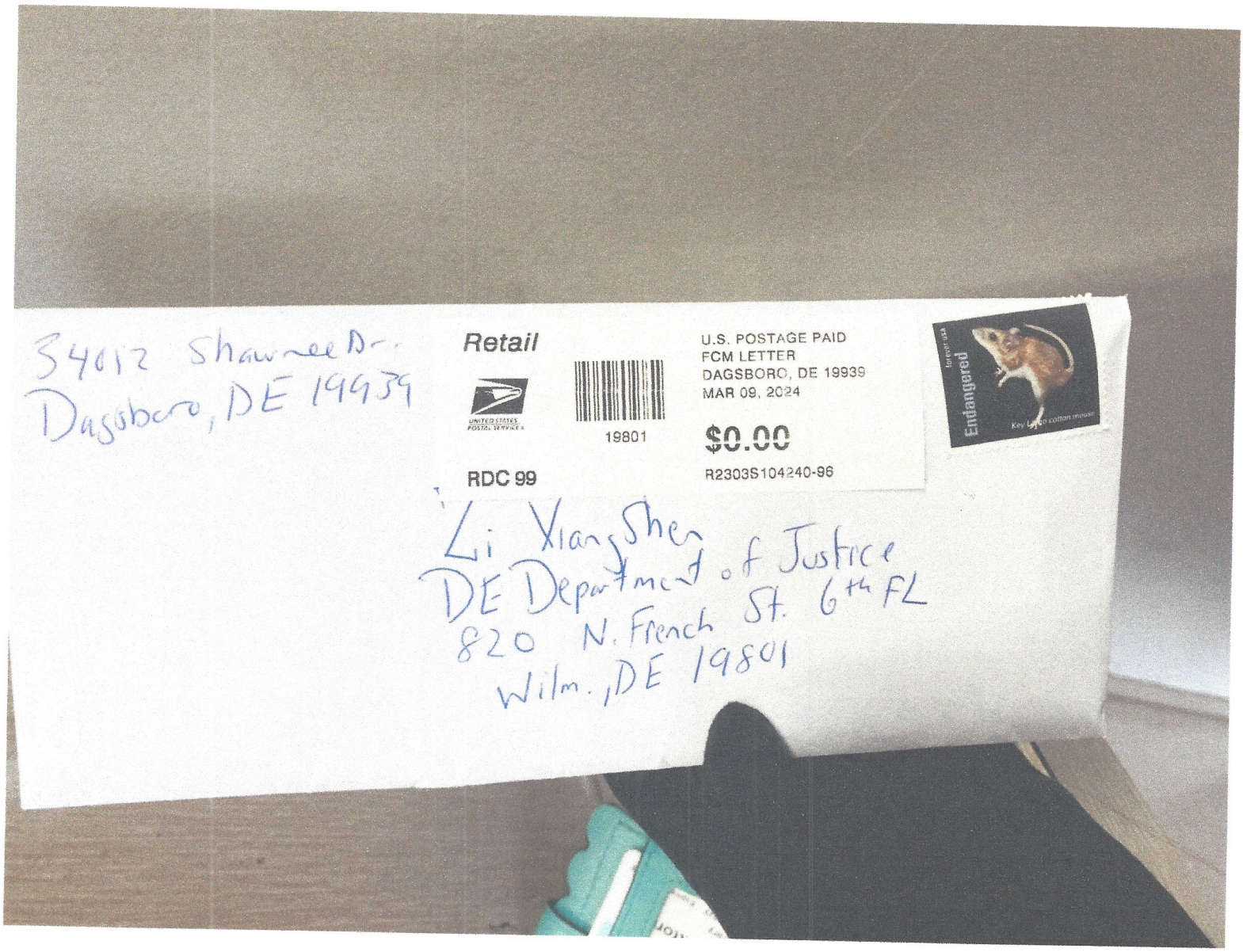
You want to work with me on the splits? If they hear our case to uphold justice by talking about the rules together and the splits between jxn on what protections attorneys have?

Thank you,
Meg

March 9 Cert of Service.pdf
1.8MB

Postal Receipt.pdf
144.8kB

envelop Cert of service March 9 Sent with March 9 as a safety precaution.pdf
78.7kB


34012 Shawnee Dr.
Dagsboro, DE 19939
Retail
19801
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Li Xiang She
DE Department of Justice
820 N. French St. 6th FL
Wilm., DE 19801

Meg is at the us sure court emergency

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov

Cc: meghankellyesq@yahoo.com; rmeek@supremecourt.gov; david.weiss@usdoj.gov

Date: Saturday, March 9, 2024 at 03:04 PM EST

Hi Robert meek,

I am at the us Supreme Court now.

I was told they accepted documents 24 hours even on Christmas.

They are not accepting my documents now, even though they accepted a similar amount of boxes when it was closed on Dec 25-26

I drove here and it took more than 2-3 hours.
Can you please help me now if possible before I go

Thank you
Meg

Sent from my iPhone

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Mary Ellen
34012 Shawnee Dr.
Dagsboro, DE 19939

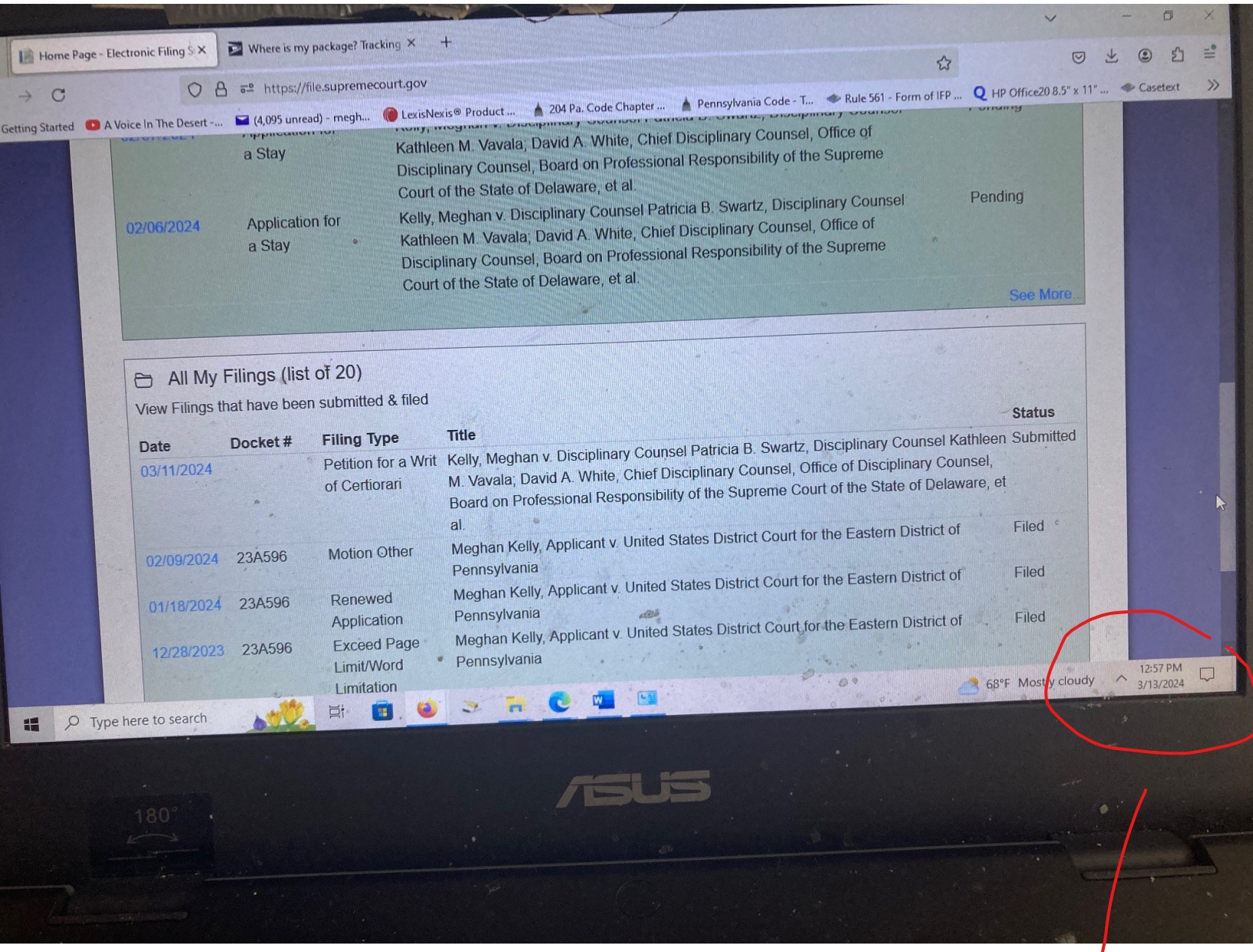






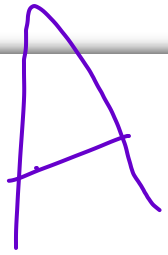
Zi-Xiang Shen
Delaware Department of Justice
Carvel State Bldg 820 N. French St.
Wilmington, DE 19801

R



12:57 PM

3/13/24



Summary

* Your Electronic Filing was submitted on 3/11/2024 12:07 AM.

Petition for a Writ of Certiorari - Federal

Petitioner:
Kelly, Meghan
Respondent:
Disciplinary Counsel Patricia B. Swartz, Disciplinary Counsel Kathleen M. Vavala; David A. White, Chief Disciplinary Counsel, Office of Disciplinary Counsel, Board on Professional Responsibility of the Supreme Court of the State of Delaware , et al.

U.S. Court of Appeals:
United States Court of Appeals for the Third Circuit
Case Number(s):
21-3198
Court of Appeals Decision Date:
4/20/2023
Did the Court of Appeals deny a timely petition for rehearing?
Yes
Rehearing Denied Date:
6/20/2023
U.S. District Court:
United States District Court for the District of Delaware

Is this a Capital Case?
No

Rule 39 - Filing In Forma Pauperis (Motion for Leave to Proceed In Forma Pauperis required).

Attorney

Meghan Marie Kelly (Counsel of Record)
Party Name:
Meghan Kelly
Firm:
Attorney at Law
Address:
34012 Shawnee Drive, Dagsboro, DE 19939
Phone #:
302-278-2975
Email:
meghankellyesq@yahoo.com

Notifications

meghankellyesq@yahoo.com

Documents

Motion for Leave to Proceed IFP - 1 Petition for Leave to file in forma Pauperis.pdf
Virus Scan Completed

Motion for Leave to Proceed IFP - 2 ex to IFP Jan 23 pet cure defect Feb 7 stay for potential counsel in this case.pdf
Virus Scan Completed

Motion for Leave to Proceed IFP - 3 exto IFP 77th 124th and 127th affidavits.pdf
Virus Scan Completed

Motion for Leave to Proceed IFP - 4 Ex to IFP 133rd affidavit DI 282 big.pdf
Virus Scan Completed

Motion for Leave to Proceed IFP - 5 ex to IFP 152 153 154 159 167 169 171 173 175th affidavits.pdf
Virus Scan Completed

Motion for Leave to Proceed IFP - 6 ex to IFP DI 348 big 176th affidavit.pdf
Virus Scan Completed

Petition - file Petition Kelly v Swartz Civil rights case.pdf
Virus Scan Completed

Appendix - 1 A-1 Constitutional and Statutory Authorities.pdf
Virus Scan Completed

Appendix - 2 App A to M Orders and memorandum.pdf
Virus Scan Completed

Appendix - 3 Original complaint and exhibits not all on DI 3 none DI 4.pdf
Virus Scan Completed

Appendix - 4 April 26 filed w memory stick not to USSC staff fired const challenges rules 13 14 rolln mot 2 amend complaint.pdf
Virus Scan Completed

Appendix - 5 email from file and serve with graph of sealed motions with dates DE Suprme Ct sealed to hide evidence in my favor.pdf
Virus Scan Completed

Appendix - 6 Agenda to eliminate the courts.pdf
Virus Scan Completed

Appendix - 7 Reply to ODC answ to my objct to Board finding DI 77.pdf
Virus Scan Completed

Appendix - 8 Appellate Brief 3DI 98.pdf
Virus Scan Completed

Appendix - 9 3DI 199-1 petition for panel rehearing only abused discretion.pdf
Virus Scan Completed

Appendix - 10 Kelly v Trump Complaint A4 A5 B Aug 23 lett C Pet at 7.pdf
Virus Scan Completed

Appendix - 11 Ex D Police report 2 bullets Meg poster believes danger based on church gov partnerships private public partnerships.pdf
Virus Scan Completed

Certificate Word Count - Cert of serv w corrected cert of serv NO MEMORY STICK TO USSC CONFIRMED May 9 2024.pdf
Virus Scan Completed

Supreme Court of the United States

Your Electronic Filing record has been submitted.

From: no-reply@sc-us.gov

To: meghankellyesq@yahoo.com

Date: Monday, March 11, 2024 at 12:07 AM EDT

Your Petition for a Writ of Certiorari has been submitted. It will be reviewed once the hard copy is received. If you are not expecting this email, please contact the Supreme Court Electronic Filing Support Group at eFilingSupport@supremecourt.gov.

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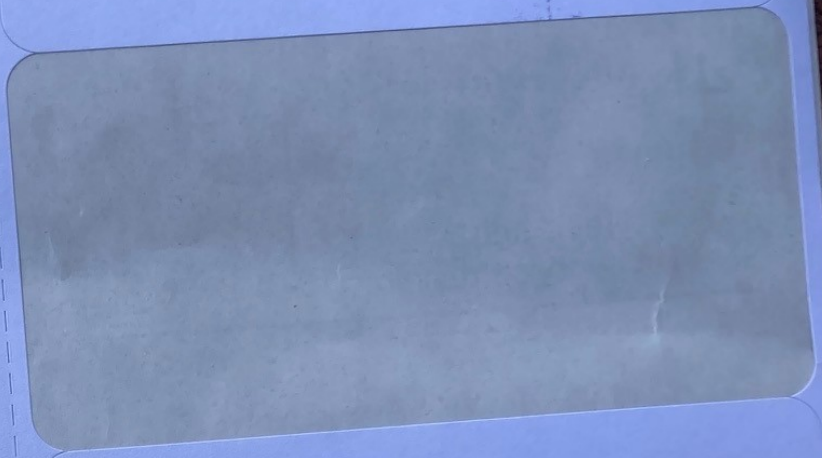
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OFFICE OF THE CLERK

2024 MAR 11 A 11: 11

D.S 558

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Masque tout
Allez à avery.ca/gaba
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Re: Kelly v Swartz Meg Kelly received one box with cert of service two appendices with a letter in error from Robert Meek dated March 13 2024 Fw: Correspondence from The Supreme Court of the United States

From: Meg Kelly (meghankellyesq@yahoo.com)

To: rmeek@supremecourt.gov

Cc: lnesbitt@supremecourt.gov; jbickell@supremecourt.gov; zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov; supremectbriefs@usdoj.gov; anthony.sodroski@pacourts.us; harriet.brumberg@pacourts.us; meghankellyesq@yahoo.com

Date: Saturday, March 16, 2024 at 08:54 AM EDT

Hi Robert Meek,

I write to correct myself. There are 6 fewer boxes. The appendix fro the pet. for writ of cert was smaller than the appendix to the IFP. I placed 3 copies of the appendix in 3 boxes for a total of 9 and two in one box for a total of 11, one original and 10 copies.

So there were 29 items, not 35. 11 part 2 IFP were lighter. I combined the appendix to the brief and the IFP in one of the two boxes to opposing counsel with a card addressing what was in the box. I did not want to confuse the court. So, I kept them separate for the court for ease. Per the attached picture I wrote on the boxes to let the Court know what was in them in the same manner I did for opposing counsel.

Lisa Nesbitt indicated she would send back all of the documents to me should they be rejected. I do not have enough paper or means to get enough paper to reprint them. I have not had an opportunity to confirm whether the two appendices Robert Meek sent back included all of the documents.

My printer may need repair. So excuse any delays occurring. Plus, I do not know how I will pay for gas. Consignment store took some of my bags and stuff but they do not give people money if they are not sold. They write it off as they donate it after 60 or 90 days. This grants them tax breaks, an incentive not to sell to pay less. That doesn't work for me.

Attached, please find the rejected pet. for writ of cert. and proof of service on March 11, 2024 not March 12, 2024 as Robert Meek stated in his letter dated March 13, 2024. The cert of serv I sent you via email was not the same one I mailed out or filed electronically because it was missing the first page for the original cert of service behind the corrected one I mailed out March 11, 2024 where I indicated service was rejected by US Supreme Court and no electronics will be submitted to US Supreme Court.

Robert Meek the deadline was March 13, 2024. I am concerned you sought to obstruct my access to the courts by the March 13, 2024 letter. I am glad Lisa Nesbitt remedied it.

Thank you,
Meg
Meghan Kelly
34012 Shawnee
Dagsboro, DE 19939

> On Friday, March 15, 2024 at 03:46:16 PM EDT, Meg Kelly <meghankellyesq@yahoo.com> wrote:
>
> Hi Robert Meek,
>
> On Monday March 11, 2024 I submitted 11 boxes labeled IFP, 11 boxes labeled IFP 2, 11 boxes labeled Appendix, 1 box with an original and 10 copies of the petition for writ of cert I think I labeled appeal in pen as opposed to marker, one brown envelop with corrected certificate of services for a total of 35 separate mail containers.

I received one of the appendix boxes back today with two believed copies of the appendix and the certificate of services, which were in the brown envelop.

Along with it I received a letter in error from you attached hereto and dated 3/14/2024 with the 2 appendices where you note the application is out of time.

I filed a petition for writ of cert on Monday, not an application. This was sadly was denied with 60 days leave to cure defects per the email below.

Per the attached letter dated 1/12/24 I was required to file this by or before 3/13/24. I drove to the US Supreme Court on Saturday May 11, 2024 and presented it for filing as I have done every prior time I filed in person when the offices were closed. As I noted in the corrected certificate of service Officer Johnson and Sgt McBeth requested I come back during the week. They indicated they would not file it as the Capitol police has done every other time I presented documents in person after hours.

I complied. I was too scared to miss the deadline that I drove early in the morning and arrived and timely on March 11, 2024, and filed the petition.

Lisa Nesbitt spoke with me and indicated I may draw on the appendix letters. Since the appendix fr the Motion to file In forma Pauperis is larger than the pet for writ I am labeling them "A IFP", "B IFP" to prevent confusion between the two items.

In the corrected certificate of service I noted averred

"However, Sgt McBeth and Officer Johnson, said they could not accept any digital date, nor could they accept any of pleadings on March 9, 2024.

They requested I come in during the week. They also said they could not receive electronic data with the filing.

So, the US Supreme Court will not have the electronic memory stick the DE District Court sent to the Third Circuit which is identical to the information contained on the memory stick I sent opposing counsel despite the fact I incorporated it into my appeal. They cannot review it.

To confirm, I drove from my home in the early afternoon and arrived back after 6:00 PM. I was unsuccessful in service to the US Supreme Court today March 9, 2024. I am not going to provide the electronic data herewith upon service.

Please find proof of attempts to serve and pictures I verify in good faith.

Poverty creates a substantial burden upon my access to the courts. I cannot afford to mail in documents due to Defendants 'preventing me from seeking to return to my former law firm for the job of my choice and assert US Amend XIII with regards to involuntary servitude. So, I must physically drop documents off since poverty creates a substantial burden to my access to the courts. I also have religious objections to debt. I believe go to hell seeking money, avoidance of costs and convenience for themselves to care for their own or the convenience of others at the exchange of enslaving or oppressing others or harming other people's health or life for profit, especially research and science. I believe most people go to hell per Jesus. Matthew 7:13-15, Luke 13:23-28. I believe correction in court may save lives of the victims and the eternal souls of the wrongdoers by correction to help the blind see and the dumb hear. Upholding justice is a religious command. Amos 5:15 and Matthew 23:23, and to persist like the pestering widow who petitioned an unjust judge over and over again until he granted her relief ti get rid of her. Luke 18:1-8.

I assert my 1st Amendment right to religious belief in Jesus, 1st Amendment right to exercise my religious beliefs, my 1st Amendment right to speech in my petitions, and my 1st Amendment right to petition, 5th Amendment due process protections to be heard fully and fairly by this Court without insidious partiality to the government as opposed to the impartial application of the Constitution to the rule of law by the government including this US Supreme Court in accordance with the 5th Amendment's due process component. I reserve my right to be separate, holy and not conformed to the wicked vanity of other people to lose my soul in hell."

I assert my 1st Am right to petition and 5th Am amendment right to due process to be heard fairly and fully on the petition before the government vitiates my life, liberty or property interests including but not limited to the right to petition. The 1st Am rt to petition protects the rt to access to the courts to complain to the gov including this court without fear of punishment.

The 1st Amendment right to petition combined with the 5th and 14th Am rt to due process is the cornerstone of a government of, by and for the people. The power of the government and the power of the people including the 1st Am rt to pet is based on the rule of law, the Constitution, which sustains and maintains these United States. The power of the government is NOT based on the will of the people.It is based on Constitutional law. Petitioning is the only individual liberty that safeguards every other Constitutionally protected individual liberty and claim without compromise or vitiation for the collective representative interest by the vote. The vote is a tool of oppression eliminating individual liberties **if not restrained** by the courts to serve mob rule as opposed to the impartial application of the Constitution to the rule of law.

The judiciary is the most important branch since it protects individuals and individual liberty and grants us a democracy in our democratic republic. Without you there is no freedom just lawless reign by those with power, connections or wealth unrestrained by love or just law from oppressing, killing, stealing or destroying human life, health or liberty for vain material gain. That makes court staff and courts irreplaceable.

Yet no one should be denied access to the courts disparately as that is a denial of freedom by making some citizens unprotected by the laws. Moreover the courts have no power should no one petition in a case or controversy. I believe the courts are in trouble. When I petition to preserve my claims and preserve the rule of law it is never to destroy those who allegedly err.Mistakes happen, and Constitutional defects occur which make court staff invaluable and necessary to uphold the fair administration of justice.

Most filings I submitted to this highest court indicated my belief the US Supreme Court is in trouble. All courts are in trouble. Yet this court has denied all petitions for writ of cert I in good faith submit. I do not seek to destroy this court but to save it and our country from dissolution by allowing the dissolution of the rule of law that created, sustains and maintains these US. It is the Constitution, the law, not the will, or trendy fads that sustains this country. That makes you special.

Nevertheless, I should not be deprived of access to the courts because the court is scared of accepting petitions to correct mistakes I allege it makes, including the 11/6/236 petition in the PA appeal (I have to copy PA counsel), and the 1/23/24 petitions which were neither accepted nor rejected or returned in conformity with this court's rules or case law. :(Please forgive typos. I am a poor typist.

Have a good weekend. On a side note, talking to Lisa Nesbitt for two minutes alleviates a lot of confusion and needless heartache. I want to specially thank her for her time and importance in helping me and others.

I believe the entities I used to work on in my first law firm ever in Delaware will be used for criminal purpose of reselling bad debt by the banks to allow a crash to allow for a foundation to jeopardize national security down the line. The way bankruptcy remote entities work is by contract law once the managing member dissolves by bankruptcy or dissolution a spinging member hops in simultaneously to allow the reselling of bad debt to gain debt control oer the government and the people into infinity. The ABA has an article praising these entities, but I believe they will be used to overthrow the government after 2050 if the courts are not our hero to stop it. Yet, the courts keep squishing me like a bug. I seek to save the courts not destroy them. I cry as I type this.

Thank you for your time and help.

Thank you,
Meg
Meghan Kelly
34012 Shawnee Dr
Dagsboro, DE 19939

----- Forwarded Message -----
From: "no-reply@supremecourt.gov" <no-reply@supremecourt.gov>
To: "meghankellyesq@yahoo.com" <meghankellyesq@yahoo.com>
Sent: Thursday, March 14, 2024 at 12:10:08 PM EDT
Subject: Correspondence from The Supreme Court of the United States

SUPREME COURT OF THE UNITED STATES

OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001

March 14, 2024

Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

RE: Kelly v. Swartz, et al.
USCA3 No. 21-3198
No: 23a100

Dear Ms. Kelly:

The above-entitled petition for writ of certiorari was received March 11, 2024. The papers are returned for the following reason(s):

The cover of the petition must bear the correct title of the document ("Opening Brief...etc." should not appear on the cover). Rule 34.1(e). You may use the enclosed sample cover as a guide.

The questions presented for review should be short, concise and not argumentative, repetitive or contain unnecessary details. Rule 14.1(a).

The petition fails to comply with the content requirements of Rule 14, in that the petition does not contain:

The reasons relied on for the allowance of the writ. Rules 10 and 14.1(h).

Please correct and resubmit as soon as possible. Unless the petition is submitted to this Office in corrected form within 60 days of the date of this letter, the petition will not be filed. Rule 14.5.

A copy of the corrected petition must be served on opposing counsel.

When making the required corrections to a petition, no change to the substance of the petition may be made.

Sincerely,
Scott S. Harris, Clerk
By:

Lisa Nesbitt
(202) 479-3038

3 Confirmation of receipt.pictures of some boxes not all at USSC as delivery. envelop with 6th floor corrected cert of serv.pdf
8.7MB

4 Proof March 11 submission not marked as filed afternoon March 13.pdf
935.7kB

A - Electronic Filing System External March 11 after 12 Am.pdf
298.9kB

B Yahoo Mail - Your Electronic Filing record has been submitted..pdf
72.6kB

C Sticker receipt by US Supreme Court.pdf
354.9kB

D Sticker receipt US Supreme Ct.pdf
382kB

file Petition Kelly v Swartz Civil rights case.pdf
945.9kB

No. _____
Application No. 23A361
Application No. 23A100
Application No. 22A747
Related No. Petition for Cert before Judgment 22-6783

IN THE SUPREME COURT OF THE UNITED STATES
Meghan M. Kelly, Petitioner
v.
Disciplinary Counsel Patricia B. Swartz, Disciplinary Counsel Kathleen M. Vavala; David A. White, Chief Disciplinary Counsel, Office of Disciplinary Counsel, Board on Professional Responsibility of the Supreme Court of the State of Delaware, Preliminary Investigatory Committee, Attorney General Delaware

On Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit
Case No 21-3198

Appellant Plaintiff Meghan Kelly's Opening Brief
moving the US Supreme Court to vacate the Third Circuit's Orders dismissing the case under Younger, denying recusals of Judge Scirica and Phipps and to remand the matter to the Delaware District Court for consideration

3/8/24

Respectfully submitted,

/s/Meghan Kelly
Meghan Kelly, Pro se
Not acting as an Attorney
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693
US Bar 283696, pro se, defending Private religious belief in Jesus as God, not money, convenience or material gain as master and God to gain the world for myself or the convenience and profit of others to lose my soul in hell. *Matthew* 6:24

QUESTIONS PRESENTED

I Should this Court hear the appeal in a case and controversy **to allow the Courts**, **not Congress, or bureaucrats or Disciplinary Boards** by remanding the case below to consider the issues

1. whether judges may be disciplined or otherwise corrected within the purview of the Constitutional limits of 1. Case or controversy or 2. impeachment without violating Kelly's right to an impartial forum to petition not partial towards regulations or regulators instead of the impartial rule of law as applied to her by allowing me to amend the complaint to Constitutionally challenging Attorney and Judicial disciplinary proceedings
2. Kellys Constitutional challenges to certain Disciplinary Rules not limited to Rules 13-14, or the reporting requirements under rule 18 by compelling self-incrimination under the threat of punishment in contravention of the 5th Amendment in quasi-criminal proceedings and of this Court's decision in Spevack v. Klein, which courts like *Mississippi State Bar v. Attorney-Respondent in Disciplinary Proceedings*, 367 So. 2d 179, 183 (Miss. 1979 seems to void
3. Whether the Courts should consider the **numerous splits** between the state and circuits on what Constitutional rights attorneys and judges have, given Kelly's case is ripe to resolve a bunch of splits since she alleged facts the Defendants and Courts violated Constitutional rights not limited to the split in whether attorneys have the 6th Am right to cross examine their accuser or call witnesses. There are too many splits not limited to the split where one forum says attorneys have the right to gather evidence through discovery and Virginia says no attorneys have no right to perform discovery. **I assert my right to be heard first below fairly and fully before this US Supreme Cort resolves the splits which may apply to it should it deny my pleadings to prevent regulating this US Supreme Court by disciplinary proceedings too**. I was hoping this Court would resolve the split of one of the 6th Amendment issues in Richard Abbott's case in hopes he may possibly regain his license to represent me since I asserted the ADA in DE and PA disciplinary proceedings which they ignored. I believe people go to hell for trusting in healthcare, mental healthcare science, or even using people as products in experiments even with their consent, should they not turn away from sin. I attached the bad healthcare I received and asserted my right not to die or harm my health or be enslaved for the sinful vanity and profit of professional which were completely ignored. State attacked me again 3/5/24 by depriving me of access to the state of Delaware's law library in retaliation for asserting rights. People have threatened me with violence and shot two bullets through a friend's home based on gov incited private attacks for my religious-political beliefs, speech, perceived association, and petitioning under the 1st and 14th Amendments. I believe people go to hell for killing themselves. I have the same ideas as Lincoln and Kennedy in my Complaint. (DI 2) I do not want to die. I am scared. Please protect my right to petition at the imminent threat of capricious loss of life, liberty and property, even if you disagree. It matters more that the Court retains its authority than whether it agrees with me in light of a plan to eliminate the courts as shown on the record below. See agenda to eliminate the rule of law attached hereto.

II. Given: The Constitution lawfully vests legal power in the governments' three branches and in the people themselves to place checks on the government to prevent the government from eliminating the law as applied to the government. May the Court remove the legal check of the people by removing the legal power of the people and me specifically to exercise the 1st Amendment right to petition and 5th and 14th Amendment due process opportunity to be heard by the government in consideration of petitions before maliciously capriciously depriving me of my asserted liberty interests in life, liberty or property rendering then government not bound by the law leaving the government unchecked and the United States no longer by and for the people but by and for the government's whims unrestrained by law.

III. Stating the issue more broadly to respectfully give the court room to disagree or agree since I know that I see things differently than this court or the world.

Given: **The United States is founded based on the Constitution as rule of law,** and is maintained and sustained by the rule of law. The power of the government and the power of the people including the 1st Amendment right to pet coupled with 5th and 14th Amendment right to fair opportunity to be heard is based on the rule of law, the Constitution, which sustains and maintains these United States. Petitioning is the only individual liberty that safeguards every other Constitutionally protected individual liberty and claim without compromise or vitiation for the collective representative interest by the vote. Whether the courts degrade the Constitution as rule of law that sustains these United States and threaten dissolution by the removal of the legal power of the people to restrain the government from violating law **by obstruction of the right to petition and due process asserted opportunity to fairly and meaningfully be heard as applied to me**, congressional decrees of immunity or case law granting immunity to government agents such as Presidents, including former President Trump. Whereby the courts threaten our national security by eliminating the people's check through the 1st Amendment right to petition coupled with the5th and 14th Amendment fair and meaningful opportunity to be head before capricious infringements of life, liberty or property. This Court may also consider the Constitutionality of the immunity Clause contained in the Constitution as applied to Congress with exceptions that should certainly apply to President Trump should it make a determination on this issue. Even the debate clause Article I, Section 6, Clause 1 excepts Congressional immunity "for "Treason, Felony and Breach of the Peace, be privileged from Arrest."

Given these United States are founded **NOT** based on the will of the people by the legal fiction, **the lie** representation by the founders or representation of the majority through the vote in the executive and legislative branches is consent to be governed and enslaved to compelled labor or to pay taxes by compelled involuntary servitude to be ruled by those who unjustly control the resources by government delegation by the lie representation of the majority, not the individual is consent to slavery to enrich private and foreign partners, especially in light of the manner is coined lawlessly by debt plus interest that cannot be paid back by design to allow slavery of the world through government backed economic, physical and social force if left unrestrained by the courts to safeguard the lives and liberties of the people the Constitution avers to protect. US Amend. I, V, XIII. See Preamble (See, *Clericis laicos* by Pop Bonefice 1296 and Third Council of the Lateran met in Rome in March 1179. Pope Alexander III presided and 302 bishops attended where they declared law including Canon 19 declaring excommunication for those who tried to tax churches and clergy without the consent of the bishop.); representation is not consent to taxes to be enslaved to those who create money out of nothing and require interest which cannot be paid back by design and their private and foreign partners. There is a plan to

label churches business to eliminate them by controlling them by credit debits in a system where the elimination of governments will occur. The deception of representation is consent to taxation, meaning to slavery to sin and death in hell by making money God is rooted in misguided men in my own church not merely on the tea party and conniving men like George Washington who was a terrible military mind. He causes the global war, the 7 years' war to allow for banks to enslave a no longer free but indentured people, and indentured US (and Europe too, we contributed to the Bank of England's enslavement of its own people) at the birth of this nation should the courts not secure freedom to sustain these US from a schemed overthrow after 2050. The bankruptcy remote entities I used to work on will likely be used with the criminal purpose to allow for the overthrow. Please help save not only me, but yourselves and the US as I outlined my belief of an actual schemed overthrow where only the courts can stop it, but cannot if they do not reverse its findings on the 14th Am and grant hear a case without presidential immunity)

Given the vote is a tool to eliminate individual rights under the legal fiction the people's participation by the vote is a collective compromise allowing for human sacrifice of life and liberty if unrestrained by the courts by the application of the Const to the rule of law to preserve the lives and liberties of the people and their property from infringement without Due Process.

Given the Enlightenment thinkers and founding father theorists are wrong in that the power of the Government and the People rests NOT in the will of the people by those who teach the vote is a collective social contract or compromised representative agreement and bartered for exchange for the souls of people to sell for government agents to pay for power and profit eliminating freedom by deception money is freedom when it is coined to enslave and whether the manner Presidents Lincoln, Kennedy I proposed to coin lawfully in accordance with the US Amend I, V, XIII, XIV may be used to sustain these Unites States while safeguarding not infringing on freedoms from schemed overthrow. Please see the 93rd Aff with regards to funding the courts please.

IV. Whether Younger does not require abstention to my case. Given the following: There is no state case to abstain from. The state case has concluded. There is no bar. Even if there was a case since this issue is capable of repetition yet evading review: 1. Younger does not apply to my claims for damages. The Court erred by dismissing instead of staying the case 2. Younger does not apply to federal const claims in the or ancillary claims I had no opportunity to assert on the state forum. For example, 42 U.S.C.A. §§§ 1983, 1985, 1988 3. Bad faith, harassment, or extraordinary circumstances have arisen in my case that make abstention inappropriate 4.The Court erred in denying my motion to amend the complaint to include procedural and substantive due process violations, equal protections violations, and other conduct and claims that required I add additional parties to my complaint on January 24, 2022. (DI 43, 58, 77-81) I should be granted leave to amend the complaint, to correct any defects or arguments relating to a Younger dismissal to prevent manifest injustice that shocks the conscience in terms of loss of fundamental rights, and government punishment for the exercise of my rights, including the right to petition. 5. The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the opportunity to be heard to safeguard my exercise of First Amendment rights, creating loss of First Amendment rights and my interest in my ability to work in my profession. The new claims arise for injuries sustained not only prior to the suit but after including relating to 6th and 14th Am structural error in denying me the right to self-represent for 20 days, only removing it fewer than

2 weeks before the proceeding causing me to foreseeably get shingles. I asserted my 1st Am right to religious belief in self-representation as a religious exercise, lack of notice, than defective notice prejudicial to me and in violation of the 20 days required by the rules which I did not waive at any time and made a special appearance at the hearing maintaining objections, and lack of meaningful opportunity to be heard by ignoring and not addressing motions, and addressing some 2 days before the alleged proceeding, rejecting my asserted right to call witnesses including a witness Defendants fired to conceal the elimination of material evidence and to deny me the opportunity to cross examine her despite the DE Rules stating I have a right, denial of access to the law library, obstruction to my access to petition and procedural due process asserted meaningful opportunity to prepare, perform discovery, call witness, present my case, objection to the hearing transcript which was too prejudicial and flawed to cure and had weird stuff in it. After the case was over I discovered all of the members of the Supreme Court participated in inciting the attacks in Kelly v Trump and concealed evidence in my favor during the case to hide it from this Court on appeal and from the case they incite to demean me disabled to cover up its own misconduct. There are too many complaints to describe the claims here now. The Statute of limitations would expire on many claims relating to the disciplinary case potentially including the Constitutional challenges to the proceeding, certain rules and to resolve **numerous splits** as to what Constitutional protections judges and attorneys have in disciplinary proceedings.

V. Whether the Court erred as matter of law by not granting or even addressing motions to amend the complaint requiring this case must be remanded with grant for leave to amend the complaint interest of justice since the District Court allowed the additional injuries to be had against my person in bad faith. Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009). If my motion to amend the complaint to include the Court had been permitted, the Court would not be permitted to find Younger abstained my case. Because this District Court prevented service of the Complaint, I must be permitted fair opportunity to amend the Complaint after my appeal to the US Supreme Court to prevent manifest injustice against me, pursuant to Fed. R. Civ. P. 15 (a), and under other provisions of Fed. R. Civ. P. 15. I have a right to "amend without leave where no answer has been filed." Citing, De La Cruz-Saddul v. Wayne State University, E.D.Mich.1980, 482 F.Supp. 1388. The District Court allowed the additional injuries to be had against my person in bad faith. Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)). Because this District Court prevented service of the Complaint, I must be permitted fair opportunity to amend it after my appeal to the US Supreme Court to prevent manifest injustice against me, pursuant to Fed. R. Civ. P. 15 (a), and under other provisions of Fed. R. Civ. P. 15. I have a right to "amend without leave where no answer has been filed." Citing, De La Cruz-Saddul v. Wayne State University, E.D.Mich.1980, 482 F.Supp. 1388 (Also see, Adams v. Quattlebaum, D.D.C.2004, 219 F.R.D. 195 "Plaintiff enjoys absolute right to amend complaint once at any time prior to responsive pleading or granting of motion to dismiss.")"Leave to file an amended complaint is not required, since defendant had not yet answered," and has not even been served yet. Cunard Line Ltd. v. Abney, S.D.N.Y.1982, 540 F.Supp. 657. I think it prudent to serve an amended complaint as opposed to an original, and provide my intent to file an amended complaint at a later time, all at once at the conclusion of my appeal of the Delaware disciplinary matter to the US Supreme Court. (See, Datastorm Technologies, Inc. v. Excalibur Communications, Inc., N.D.Cal.1995, 888 F.Supp. 112, "Complaint that has been amended pursuant to rule governing motions to amend suspends pleading it modifies, rendering original pleading void.")

VI. Whether this Court should remand this case with allowance to amend because this case presents unique important Constitutional questions as to whether a disciplinary proceeding brought to punish petitioner for the exercise of her 1st Amendment right to petition based on viewpoint, with favoritism to the government and disparate bias against claimant, in violation of the US Amend I right to petition, and right to speech, on subject matter grounds, and the Equal Protections Clause is subject to voidability, even if this Court finds it voidable due to lack of due process. Defendants seek to discipline Colleague Abbott for petitioning against the County and Courts. Are the courts above the law, or will this Court rule judges may be corrected within the purview of the Constitutional limits 1. Cases and controversies and impeachment, without vindictive retribution for correction. Richard Abbott is an attorney who makes the world more just and faire.

VII. Whether the evidence outlined on the record below concerning both Kelly v Trump and the DE Disciplinary show a high probability of procedural due process violations so great that I should be permitted to argue before the trial Court the Delaware District Court subject matter jurisdiction is void or voidable, especially since the statute of limitations would be tolled for claims relating to Kelly v Trump and for retaliation in response to my exercise of the 1st Amendment right to petition for exemption for bar dues.

VIII. Whether the Court committed reversible error in dismissing my complaint given Defendants indicate my religious beliefs and citations to the Bible contained in my speech in my petitions to alleviate a government substantial burden upon my religious exercise by Trump's establishment of government religion is in issue, as Defendants' reason for interfering with in an attempt to cause me to forgo Kelly v Trump and later after the conclusion of my Religious Freedom Restoration Act lawsuit Kelly v Trump, and after the filing of Kelly v Swartz, in bringing the disability proceeding in violation of my 1st Amendment rights to petition, speech, religious belief and exercise of belief applicable to the state pursuant to the 14th Amendment, which claims I may only be bring in the federal court for damages and nominal damages, given the State forum before the Board has no jurisdiction to grant monetary relief or nominal relief for the State's Constitutional, state and federal violations, and since it is highly probable the State DE Supreme Court incited the interference with the malicious purpose of chilling and eliminating my 1st Amendment rights to petition, speech, association, religion and religious exercise especially since the DE Supreme Court c/copied the Disciplinary Board administrator in a letter to me 10/21/20 in the open, concealed evidence in my favor during Kelly v Trump and fired two material witnesses, two court staff to prevent evidence in my favor during the disability proceeding while denying my right to call them as witnesses.

IX. Whether the Court abused its discretion for dismissing my initial complaint under Younger arising from Defendants, the Delaware Supreme Court and the arms of the Court's interference in my RFRA law suit against former President Donald J. Trump made with the intent to intimidate me to cause me to forgo my case based on the Defendants disdain for my religious-political beliefs contained in my speech, in my petitions, or poverty and my petitions to correct and stop Court misconduct in light of the admitted reason for discipline was the Defendants found my religious beliefs in the bible and Jesus incomprehensible, when I sued Trump to alleviate a substantial burden upon my exercise of religious belief from the burden he caused by the establishment of government religious belief in a course of conduct not limited to

executive orders Ex. Or. No. 13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. No. 13199, Jan. 29, 2001, as revoked by Ex. Or No. 13831, May 3, 2018; Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010; Ex. Or. No. 13559, Nov. 17, 2010; Ex Or. No. 13831, May 3, 2018, and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 that give churches money to perform government business under the lie of charity and another executive order E.O. 13798 which allows churches to take parishioner' donations to support or give the packing of government candidates or parties to give the blasphemous backing that God backed Trump which incited violence or threats of violence against me based on my apparent rejection of Trump religious belief.

X. Whether the Court erred in dismissing my claims against Defendants for retaliation to prevent the initiation of an unlawful proceeding brought in bad faith to cover up Court misconduct where Defendants unconstitutional sought to and did place my license to practice law on inactive disabled preventing me from buying and selling as a lawyer in violation of my 1st Amendment rights applicable to Defendants pursuant to the 14th Amendment based on disdain for my private exercise of the fundamental rights to petition, to religious beliefs contained in my protected speech, contained in my petition, essentially conditioning the elimination of fundamental rights for the active license to practice law since they find my religious beliefs repugnant or do not understand them. **Basically can a Court place an attorney on inactive disability because they find their religious beliefs illogical or repugnant even if they are genuinely held.**

XI. Whether the Court erred in dismissing the case under Younger given the numerous claims the Board whose subject matter jurisdiction under Rule 5 is limited to attorney discipline could not address, including but not limited to claims for damages, nominal damages and equitable relief for violations of 42 USC §§§ 1983, 1985, 1988, and harm to my reputation, claims for emotional distress, defamation, loss of employment opportunities, or other economic harm and for 1st Amendment rights to private petition, religious belief, speech, association and exercise of religious belief applicable to Defendants via the 14th, compelled violations of my religious belief, retaliation for the exercise of fundamental rights including but not limited to the right to petition, 5th Amendment right against self-incrimination by compelled incrimination required by the disciplinary rules, Constitutional arguments regarding a number of State Disciplinary rules, Constitutional arguments against the disciplinary proceeding, and by extension Constitutional arguments against federal judiciary disciplinary or disability proceedings and rules and the absence of life time appointments during good behavior for District and Appellate Court judges, Constitutional arguments to limit discipline or correction of Judges, including United States Supreme Court members to the purview of Constitutional limits of 1) cases and controversies and 2) impeachment by asking the court to find the US Supreme Court may not violate my 5th Amendment right as a party of one to Equal protection by a partial forum biased towards the regulations or regulators even by self-regulation instead of the impartial application of the Constitution to the rule of law, and by finding judges are above the law and above cases and controversy by depriving me of a forum for redressability for harm caused by members of the DE Courts who may not be a judge in their own case, denying me access to the record of a case where I am the accused No 341 to cover up additional deprivations of my 14th Amendment right to be heard, sending Court of Common Pleas Judge Clark, DE-Lapp and Defendants to attack me during Kelly v Trump to cause me to forgo my petition,

sealing evidence in my favor in Kelly v Trump to fix the outcome in Kelly v Trump and the future disciplinary case, firing witnesses necessary to my defense, than preventing me the opportunity to call them to cover up the DE Supreme Courts misconduct, Court staff writing on a praecipe and instructing me to cross off local counsel's address to prevent service and misleading me to miss a filing deadline in Kelly v Trump, denial of access to the law library, violations of my 6th Amendment rights applicable to Defendants via the 14th Amendment to self-represent, 6th Amendment right to call and confront witnesses in the Disciplinary Case, ancillary claims of loss of employment opportunities but for the threats incurred during Kelly v Trump which ended talks with my previous employer to start work but for the state's attacks against me during Kelly v Trump and other economic harm, and harm to my reputation, violations of procedural due process, substantive due process and equal protection under the 14th Amendment based on religious-political-poverty animus in both Kelly v Trump and the Disciplinary matter, bad faith harassment in the form Defendant Patricia Swartz lying to me to cause me to expend additional money or the case to be thrown out before the Boad, Defendants intimidating me by sending state agents to attack me or otherwise threaten me to cause me to forgo Kelly v Trump, and lack of notice, denial of opportunity to be heard, opportunity to prepare, perform discovery or call witnesses, and numerous other claims I reserve on the record.

XII. Whether the Delaware District Court's Orders (DI. ("District-Court"), (DI 16-17, 30-31, 59-60 (collectively, "District-Order")), is now in error as a matter of law and as a matter of fact, in light of with the passage of time the state proceeding has concluded. So, there is no case to abstain from under the Younger abstention doctrine. So they case should be remanded to be heard on the substance of the complaint and motions

XIII. Whether the District Court erred in applying Younger to dismiss my complaint and motions by overlooking I asked for damages and relief unavailable in the state forum. Whether the Court should have granted a stay as opposed to dismissal

XIV. Whether the District Court erred in applying Younger to dismiss my case, complaint, and motions when I had no adequate opportunity to raise my federal claims or ancillary claims for damages, equitable relief and nominal relief in state court.

XV. Whether the District Court erred in applying Younger when bad faith, harassment, or extraordinary circumstances have arisen in my case that make a Younger abstention inappropriate.

XVI. Whether the Court abused its discretion by denying leave to amend the Complaint, while applying the Younger abstention, when such amendments would certainly overcome a Younger abstention

XVII. Whether new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the opportunity to be heard to safeguard my exercise of First Amendment rights, creating loss of First Amendment rights and m
XVII Whether the Court should extend Brady violations to the Courts who intentionally

conceal evidence in favor of the accused to prejudice the accused case.y interest in my ability to work in my profession

XIII. Whether the court deprived me of the 5th Amendment right to a fair proceeding or violated 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law by failing to recuse Judge Phipps given Defendants attacks against me are based on my petitions against Trump, Trump twice placed Phipp's on a list of nominees for US Supreme Court, and Trump will likely nominate Phipps' as Supreme Court justice should he be reelected and an opening occur considering the facts under objective standards, the probability of actual bias on the part of the Judge Phipps against me and in favor of Trump and my opponents is too high to be constitutionally tolerable.

XV. Whether the court deprived me of the 5th Amendment right to a fair proceeding or violated 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law by failing to recuse Judge Scirica given the conflict of interest Judge Scirica chairs the Committee on Judicial Conduct and Disability ("Judicial rules"). (DI 149). I made Constitutional arguments against the judicial rules, against regulating the US Supreme Court by a Code of Conduct, self-discipline or disciplinary rules, and made arguments against the State disciplinary rules and proceedings that mirror the rules Judge Scirica is charged to revise and approve.

XVI. Whether the US Supreme Court errs as a matter of law by recognizing the deception of appearance of justice instead of actual justice as an important state objection somehow more important that the Constitutional application of the impartial rule of law by the wicked partial selfish interest of the state's own appearance, and if so whether this is not a legitimate reason for part of the statute or regulations of the judiciary under 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or otherwise. Since allowing partiality towards the state's appearance in light of fickle fads and popularity by the mob more than truth and justice creates a biased partial unfair forum in violation of the 5th Amendment procedural due process safeguards and equal protections component.

XVII Whether regulating the US Supreme Court by Congress or Disciplinary Rules in closed proceedings violates the people's rights to a public proceeding, to fair and impartial justices not partial towards regulations or regulators instead of the impartial rule of law and depriving petitioners from interpleading unfairly like I was deprived of interpleading in Richard Abbott's case in case he should represent me in this civil action. While I have religious objections to representation when I am brought to court based on my religious beliefs per Jesus Christ, I am bringing this case. So, it is distinguished

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

CASES DIRECTLY RELATING TO THIS CASE

Kelly v Swartz, et al, Delaware District Court No. 21-1490, and Third Circuit Court of Appeals Matter No 21-3198. US Supreme Court filings *Kelly v Swartz et al* 22A747, *Kelly v Swartz et al.* 22-6783, *Kelly v Swartz et al.* 23A100, and 23A361.

Kelly v Trump Chancery Court No. 2020-0809, Delaware Supreme Court No. 119-2021, US Supreme Court No. 22-5522

Kelly v Democrats Delaware Chancery Court No 2020-0157.

The Original disciplinary case in Delaware Supreme Court matter No. 22-58 and IMO Meghan Kelly Number 541 regarding to appointment of counsel where I was denied copies or access to the filed pleadings. US Supreme Court application 22A476 *Kelly v DE Office of Disciplinary Counsel.*

Reciprocal disciplinary case Eastern District of PA matter No 22-45, Third Circuit Court of Appeals No. 22-3372. US Supreme Court 23A144 and 23A596.

Reciprocal Disciplinary case I believe is stayed Delaware District Court No. 22-341.

Reciprocal Case in the Third Circuit Court of Appeals 22-8037. Reciprocal disciplinary case before the US Supreme Court *Kelly v Third Circuit Court of Appeals* No. 22-6584 and application No. 22A478.

PA Supreme Court No 2913 DD3, US Supreme Court filing Kelly v Pennsylvania Office of Disciplinary Counsel US Supreme Court Numbers 22A981, 22-7695

DC and the US Supreme Court have refrained from discipline, DC based on jurisdiction.

TABLE OF CONTENTS

I Orders and Opinions……1

II Jurisdiction……...1

III. Constitutional and Statutory Provisions involved…….....1

IV. Statement of the Case……1-40

VI. Conclusion……40

APPENDIX

Appendix (hereinafter "App.")

App 1-A CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED……1

App. A **June 30, 2023** Order and opinion dismissing the case……..…1

App. B April 20, 2023 Order and opinion dismissing the case…….1,

App. C June 22, 2023 Order denying the petition for a rehearing…….1, 108

App. D June 20, 2023 Order Denying 1. Motion to recuse Judge Scirica, 2. Motion for a caveat to recusal for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority, and 3. Motion for a Second Caveat to Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent judges from speaking engagements on behalf of political think tanks such as lobbyists at the Federalist Society……1,

App. E **July 10, 2023** Order Denying En Banc request and Motion for Reconsideration of Order denying recusal of Scirica…….1

App. F March 15, 2023 Order denying recusal of Judge Phipps……1

App. G January 6, 2023 Order granting an extension of time and denying of a stay……..1

App. H February 9, 2023 Order Denying a stay pending the US Supreme Court's denial of Judge Phipps Jan 6, 2023 Order denying a stay…….1

App I District Court Order and opinion dated November 2021 dismissing my case under Younger……..1,

App. J District Court Order and opinion dated December 22, 2021 dismissing my case under Younger…….1

App. K District Court Order and opinion dated April 26, 2021……1

App L Memorandum order dated 12/28/23……..1

App. M Order granting ECF Access and exemption to PACER fees, dated January 5, 2023……1,

Original Complaint in this case Kelly v Swartz, et al, dated October 21, 2021, and exhibits thereto not including the voluminous exhibits at DI4, including

District Court Exhibit 1 Photo of white substance that appeared to be thrown at my car

based on my speech, the stickers, Impeach.

District Court Exhibit 2 Police report relating to neighbor yelling at me for placing up a

political banner.

District Court Exhibit 3 Notice of Police investigation of two bullets going into Mr. and Mrs. Layton's home.

District Court Exhibit 4 Proof I reached out to people regarding laws and policies.

District Court Exhibit 5 Example of comments to CLE providers

District Court Exhibit 6 World Economic Forum article, 8 predictions for the world in 2030, by Ceri Parker, dated November 12, 2016.

District Court Exhibit 7 Emails relating to Trump entity buying up land, and evidence of the fact my computer broke and was wiped clean

District Court Exhibit 8 The Fourth Industrial Revolution, by Klaus Schwab, 2016 version, excluding additional pages of the 2017 updated version published by Portfolio Penguin, NOT ATTACHED

District Court Exhibit 9 Covid-19: The Great Reset, by Claus Schwab and Thierry Malleret, Portfolio Penguin Publishing, published 2020, by Forum Publishing, NOT ATTACHED

District Court Exhibit 10 President Obama's response to some of my comments, including a a Christmas card and a letter spelling Delaware incorrectly.

District Court Exhibit 11 The Honorable Master Patricia W Griffin's kind letter, dated December 7, 2020, granting me relief from my December 1, 2020 request.

District Court Exhibit 12 Letter I wrote to the Honorable Master Patricia W. Griffin, dated December 11, 2020, thanking for her unexpected kindness, as I am not accustomed to gaining help when I ask for it, and exhibits including a newspaper article concerning rats in my apartment at law school.

District Court Exhibit 13 January 7, 2021 letter to the Chief Justice asking for an exemption of attorney license fees for lawyers unemployed during the pandemic, with attachments of negotiations with my former law firm

District Court Exhibit 14 Meghan Kelly's employment contract to work for RLF for $135,000 a year, dated November 20, 2006

District Court Exhibit 15 Correspondence from my peers relating to the Delaware Bar,

including Travis Turner's attestation that I was not disruptive or even noticeable at the bar review course located at Widener Law School.

District Court Exhibit 16 Letters of recommendation vouching for my character

District Court Exhibit 17 My Complaint and court filings against the Board of Bar examiners.

District Court Exhibit 18 March 29, 2007, torture determination by the Delaware Board of Bar Examiners to delay my admission to the bar to make their partner a counselor money.

Exhibit 19, Duquesne A CD where I saved a file to be opened as a file not as a CD, of a news clipping where newscasters tried to help me. NOT ATTACHED

District Court Exhibit 20 The Post Gazzette Newspaper, Rat is an unwelcome study partner, by Lawrence Walsh, dated June 29, 2005

District Court Exhibit 21 ODC's letter to me dated August 23, 2021

District Court Exhibit 22 An e-mail from me to the ODC to desist, dated August 23, 2021

District Court Exhibit 23 The US Supreme Court docket for Kelly v Trump, 21-5522

District Court Exhibit 24 An e-mail from me to the ODC to desist, dated August 28, 2021

District Court Exhibit 25 The ODC's letter to me dated September 27, 2021, threatening to disbar me because of my law suit Kelly v Trump…….1-40

(DI 58) 4/26/22 filing filed before Order by Chief Judge Colm's prior to his Order and memorandum filed later the same day 4/26/22 denying my Rule 52, 59, 60 Motion on App. K attached hereto, herein I assert constitutional violations regarding certain rules and regarding the proceeding, indicate my intent to move the court to amend the complaint once as a matter of right in a rolling motion, I also submit videos an additional information on the record that had arisen notably my discovery of two Court staff were fired to prevent their testimony in my favor to hide their whereabouts from me. I attach hereto some not all of the following exhibits to the letter

Exhibit A Doctored up praecipe, dated October 5, 2020, filed October 6, 2020, I did not know Court staff wrote on it

Exhibit B July 12, 2021 Letter to the Delaware Supreme Court regarding "I was booby trapped by the Court staff Arline Simmons"

Exhibit C The praecipe to serve Delaware local counsel, through the Civil Process clerk, with the address crossed off and my initials, through the instructions of Arline Simmons.

Exhibit D The praecipe with the switched address/signature page.

Exhibit E Letter to Master Patricia Griffin regarding I am not an attorney advocate in the case, and the 60 days allowed for Federal agents to respond.

Exhibit F Letter to Assigned Vice Chancellor, dated November 10, 2020, regarding I served both Attorney General William Barr and President Trump, both the complaint and amended complaint, and requested subpoenas to serve local counsel Unites States attorney General David Weiss through the civil process clerk.

Exhibit G Letter to Master Patricia Griffin, dated October 30, 2020, regarding removal, immunity removed, and President Lincoln's misbehavior that President Trump copied.

Exhibit H Letters to the Delaware Courts requesting waiver of notary requirements since a party President Trump contracted Covid-19 at the time.

Exhibit I Letter from the Court indicating a waiver of notary requirements has already been issued unbeknownst to the Chancery Court staff and myself.

Exhibit J Letter to Master regarding disparate treatment, based on religion, political beliefs or association or poverty in violation of the equal protections clause, with attached emails to Court staff Katrina Kruger and Arline Simmons.

Exhibit K Letter to Master regarding Chancery Court staff misled me to almost miss the appeal deadline.

Exhibit L Email to David Weiss and opposing counsel regarding Dr. Bunting, Judge Smalls potentially relating to my petitions.

Exhibit M Email to opponents, with page 39 of the Fourth Industrial Revolution, relating to the elimination of lawyers, and courts down the line.

Exhibit N My pleading before arbitrator, Defendant David White.

Exhibit O An ODC's response to my complaint against Justice Kavanuagh, and the complaint against Judge Kavanaugh

Electronic Data I provide 11 brand new memory sticks, also known as flash drives, USB flash drives or USB sticks herewith containing)

1. Video where I spoke at a Democratic function, showing I misbehaved by accepting donations from the Democratic party before I learned how it caused oppression and injustice per Jesus the Christ's teachings in Matthew 6:1-4. I sinned and I am sorry your honor.

2. Video of a vulture that was pecking at the window that was not scared of me despite yelling at it in the winter of 2022.

3. Video of me on TV in the news complaining of rats in my dorm apartment from a Christian School Duquesne Law School.

4. Pictures of Judge Hardiman and me in law school, to show my personal connection to argue he should not be assigned the case should he be chosen due to potential partiality.

5. Pictures of me attending a Democratic function, misbehaving, when I should have been available to all people, regardless of party to prevent conditional conformity with the party's agenda, which prevents unconditional love and service for all citizens, regardless of each individual's position and party affiliation.

6. Video of me lamenting about how Nancy Pelosi and congress people misbehaved by failing to impeach.

7. PDF's of the pleadings I filed against the democrats, suing them without violating Jesus Christ's teachings by asking for donations or signatures, which I believe damns people to hell. I would be a bad leader if I encouraged conduct that harmed people in this life and damned them to hell forever your honor.

8. I also attached some of my marketing material so you can understand my heart, but I feel dirty. Government is a service not a business. Officials should be elected not based on appearance or popularity but based on their heart. The people should vote on their ideas not appearance. Jesus teaches us judge correctly, not based on appearance. The title marketing appears naughty to me, your honor……1-40

Email from file and serve with graph confirming 4 items necessary to my defense in Kelly v Trump, the disciplinary proceeding, reciprocal proceedings and the civil rights case were secretly sealed by the DE Supreme Court without notice or opportunity for me to be heard with dates items were sealed and dates of any changes as of the email's date, Confirming the Delaware Supreme Court secretly sealed my motions to prevent the appellate Court from seeing them or the disciplinary cases the DE Supreme Court later incited as evidenced by the letter dated **October 21, 2020,** the Graph shows dates the records were sealed and unsealed by my request after I discovered the secret fraudulent misconduct to conceal evidence in my favor, I discovered it after the disciplinary proceeding had concluded……1-40

Exhibits on an Agenda to Eliminate the courts and people in the law to eliminate the government that restrains entities from getting as much as they can for as little unrestrained from the just rule of law from oppressing, killing, stealing or destroying human life, liberty or health for the bottom line, including internal exhibits

- Obituary of Richard Goll, a Delaware attorney who was exploited by an out of state real estate company practicing law without a license
- Newspaper Article I drafted in the Coastal Point on a proposition on how to resolve the fact non attorneys are practicing law without a license
- Article by the Venus project *How can laws be eliminated* regarding a new system to replace governments after 2050
- Excerpts from the Book *Shaping the Fourth Industrial Revolution* By Klaus Schwabb, Founder of the World Economic Forum and Chairman with Nicolas

Davis, Copywrite 2018, Published in the United States by Currency, an imprint of the Crown Publishing Group, a division of Penguin Random House LLC
- Excerpts from the Fourth Industrial Revolution by Klaus Schwabb
- Article by World Government Summit Could an AI ever replace a judge in court?, dated 2017
- Article Robot justice: China's use of Internet courts By Tara Vasdani This article was originally published by The Lawyer's Daily (https://www.thelawyersdaily.ca/), part of LexisNexis Canada Inc
- Excerpts from The Great Narrative for a Better Future, by Klaus Schwabb……11, 13, 57, 167, 176-184
- Exhibit 43 Evidence objection to healthcare, mental healthcare and science on religious grounds……1-40

(3DI 208-5)(DI 77-3-DI 77-4) Respondent's reply to ODC's Corrected Response to Respondent's Objections to the Report and Recommendation of the Board on Professional Responsibility, June 7, 2022……1-40

(3DI 98) Appellant Plaintiff Meghan Kelly's Opening Brief moving the Third Circuit Court of Appeals to vacate the Delaware District Orders (DI. DI 16-17, 30-31, 59-60), and to remand the matter to the Delaware District Court for consideration, dated October 22, 2022 ……1-40

(3DI 199-1) Appellant Meghan Kelly's Petition for a Panel Rehearing , June 3, 20214,……1-40

Exhibit A Initial Complaint Kelly v Trump Case No. 2020-0809, filed 9/22/2020……..1-40

A-4 *Kelly's Motion to the Delaware Supreme Court to rein in its arms from unlawfully pressuring me to forgo or impede my case to protect my free exercise of religion*, and exhibits thereto, , including December 1, 2020 letter to Master Patricia Griffin of the Chancery Court regarding my belief I received disparate treatment by the court's staff based on religious belief, political association or poverty; emails, Internal Exhibit, Oct 19, 2020 letter to Patricia Griffin regarding I am acting as a party not as an attorney, DE-Lapp threatening email, Internal Exhibit, letter dated May 21, 2020, (3DI 121-11, DI 4)……1-40

A-5 *Kelly's motion for the Delaware Supreme Court to require the recusal of the Honorable Justice Collins J. Seitz*, and related exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he did not incite the investigation, Internal Exhibit Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship, dated February 5, 2021; attachment relating my concerns relating to recent US Supreme Court cases I disagreed with. (3DI-121-12, DI 4)……1-40

Exhibit B First Page of letter by Defendants dated 8/23/2021, showing Defendants claim "several pleadings in the "Court of Chancery and the [Delaware] Supreme Court in connection

with the lawsuit Kelly v Trump" where my religious beliefs are in issue as the source of the Defendants' interference in Kelly v Trump……1-40

Exhibit C Page 7 of Defendant's petition to the Board, dated 11/3/2021, initiating a disciplinary proceeding where they alleged the reason to discipline me is based on my references to the Bible in Kelly v Trump where my religious belief are in issue……1-40

Exhibit D *Exhibits showing belief of danger based on partnerships between not only church and state but government backed and condoned foreign and private partners inciting private attacks based on perceived religious or political association or beliefs*, including Email to Bo at the Delaware Department of elections, forwarding an email to Jesse Chadderon at the democrat's office where I was concerned about a neighbor threatening me for my sign because he previously threatened to ram my car if I park it on my parents side lot, and he allegedly threatened to use his gun should someone at the board of the development come onto his property to inspect it without authorization, pictures of substance thrown at my car, Police report concerning 2 bullets shot into the home of Greg Layton hitting the wall above the dining room table as he and his wife sat there but for his political beliefs incited by Trump-religion, some of my signs I created which caused outrage and attacks, excluding Impeach [Trump] Serve your country not your seat, excluding Impeach [Trump] No one is above the law, No one is below the law.; Exhibit 43 which includes

1. Coastal Point, Guest Column, Representative candidate says health is wealth, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District,

2. Document, "Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal,

3. Meghan Kelly's teaching certificate, which goes to credibility. I learned psychology and behavior theories like BF Skinner's. I also am licensed to teach health so I know something about health.

4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law.

5. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to

a. History of Western Medicine

b. Economics

c. Medieval Philosophy

d. Psychology courses

6. Evidence of surgery that requires I drink water, rest and eat so I do not faint or die due to dehydration when I have my period. I lose five pounds every month. This is still a challenge. I must assert my right to live because many people serve Satan by not wanting to be inconvenienced to care to adapt to safeguard my life, or the lives and health of others.)……1-40

Petitioner Meghan Kelly's Motion for Leave to file in Forma Pauperis and to Exempt fees, taxes and costs to prevent compelled vitiation of fundamental rights for her Petition for Writ of Certiorari of Third Circuit Court of Appeals Case Number 21-3198 and for all of Petitioner's filings in this matter and exhibits attached thereto and filed therewith as one document referred herein (as "IFP") including

Affidavit United States Supreme Court's Requires and **the exhibits attached thereto and incorporated therein, including but not limited to**

Exhibit 43 thereto which includes

1. Newspaper article I drafted published in the Coastal Point, Representative candidate says health is wealth, dated July 20, 2018, Coastal Point, Guest Column, *Representative candidate says health is wealth*, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District,

2. "Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal,

3. Meghan Kelly's teaching certificate, which goes to credibility. I learned psychology and behavior theories like BF Skinner's. I also am licensed to teach health so I know something about health.

4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law.

5. Evidence of surgery that requires I drink water, rest and eat so I do not faint or die due to dehydration when I have my period. I lose five pounds every month. This is still a challenge. I must assert my right to live because many people serve Satan by not wanting to be inconvenienced to care to adapt to safeguard my life, or the lives and health of others. Health care record.

6. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to

a. History of Western Medicine

b. Economics

c. Medieval Philosophy

d. Psychology courses

Letter regarding the food benefits to confirm eligibility for food benefits

Plaintiff Meghan Kelly's 159th Affidavit update concerning 23A607 Dept of Homeland Security, Et. Al. v Texas containing my concerns about the threat to national security and my anti-science religious beliefs. I am anti-science, I believe people commit lawlessness in the eyes of God and risk losing their souls in hell without repentance for using people as subjects in experiments, regardless of the patients' consent or thy are doing what they are trained to do. dated 01/26/24, with attached draft letter regarding Due Process, First Amendment and Equal Protections dared April 20, 2021. I filed the two motions the court

in bad faith sealed without notice or opportunity to be heard as to deprive me of the 1st Amendment right to petition applicable to the DE Court via the 14th and my 14th amendment right to a fair not fixed proceeding in Kelly v Trump instead of this letter presented for present sense impression purposes.

93rd Affidavit, dated which outlines religious beliefs against debt and a potential draft complaint against Biden and Yellen should the government default on pay to the courts and food benefits, as to inhibit my access to the substantially burdened and weakened courts or access to food benefits. Albeit the courts are more important than food or shelter since they protect something people cannot buy and sell freedom under the Constitution to petition which is the basis of safeguarding every freedom not limited to First Amendment asserted right to exercise religious beliefs without government incited persecution or substantial burden

Appellant addendum of additional information affidavit Proof of physical submission of my renewal application for food benefits stamped on Friday February 16, 2024, submitted with a Petition for an exemption from work, volunteer and training requirements which were previously granted the past 2 years, wherein I outline my religious objection to volunteering, 13th Amendment involuntary servitude to March 6:1-4 violations, debt, organized charity, pro bono, science, and healthcare and other asserted rights. It is important to note I am ant-science, and my religious beliefs are genuine

Appellant Plaintiff Meghan Kelly's Opening Brief moving the US Supreme Court to vacate the Third Circuit's Orders dismissing the case under Younger, denying recusals of Judge Scirica and Phipps and to remand the matter to the Delaware District Court for consideration dated 11/17/2023 for Kelly v Swartz et. al (rejected civil rights petition)

Appellant Meghan Kelly's Petition of Writ of Certiorari to the United States Court of Appeals for the Third Circuit, Case Number 22-3372 dated 12/26/2023 for Kelly v United States District Court, Eastern District of Pennsylvania (EDPA petition)

PA documents filed in US Supreme Court in PA PDF Letter To Donald Baker dated December 4, 2023

- News Article posted in Desert News, *Senate Judiciary Committee issues subpoenas to private citizens connected to Clarence Thomas*, By Eva Terry, dated Thu, November 30, 2023 at 8:28 PM EST
- Exhibit 1 Certificate of Receipt of December 1, 2023 filing of Second Petition for a rehearing, postal tracking, pictures of boxes dropped off, US Police receipt
- *PETITIONER MEGHAN KELLY' SECOND PETITION FOR A REHEARING ON DENIAL OF A WRIT OF CERTIORI LIMITED TO INTERVENING CAUSES OF SUBSTANTIAL OR CONTROLLING EFFECT CONCERNING MY ARGUMENTS AND OTHER CLAIMS NOT PREVIOUSLY CONSIDERED WHICH MAY VITIATE MY RIGHTS SHOULD THE COURT NOT HEAR THIS REHEARING*, dated Nov. 30, 2023
- *124th* Affidavit, dated 11/24//23, wherein I discuss denials of other documents which appeared in deprivation of my 1st Amendment right to access to the courts by PA Supreme Court and the United States Supreme Court including the attached motion at
- Exhibit B, *Petitioner Meghan M. Kelly's Motion for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to Rule 12(2), 29(1), and*

39(2), by the filing of one paper copy, and in addition to, or in the alternative of, permission to serve the United States Supreme Court electronically without a paper copy for future filings, due to costs relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court's to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness

- Letter denying motion despite case indicating the court has jurisdiction to grant the relief, Snider v. All State Administrators, 414 U.S. 685 (1974), albeit it denied it under the facts of that case.
- Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court, submitted Nov. 6, 2023

PA Docs Continued Petitioner Meghan Kelly's Petition for a rehearing on the 11/13/23 order denying petition for a rehearing submitted 10/18/23, denied on 11/13/23 to consider intervening causes of substantial or controlling effect concerning my arguments and other claims not previously considered which will vitiate my rights should the court not hear this rehearing

Petitioner Meghan Kelly's Emergency Application to the Honorable Justice Samuel A. Alito, Junior to stay or pause the time to appeal the United States Court of Appeals for the Third Circuit 21-3198 to discern whether Richard Abbott may represent me as counsel in the civil rights case

77th Affidavit update, dated 9/6/23, filed in DE District Court 21-1490 Docket Item (hereinafter "DI"), 192 with exhibits thereto including

- Exhibit 1 docket Petitioner's Motion to Correct an error in Kelly's petition for writ of certiorari in Kelly v PA ODC No. 22-7695, dated 9/6/23
- Exhibit A thereto, the Federal reserve reduced the limit of reserves to 0 instead of the normal 10 percent setting up banks to crash
- Exhibit B Great Narrative excerpts about eliminating paper money, and eliminating the rule of law's restraints on central banks control of money and debt
- Exhibit C Senator Whitehouse's complaint and Attorney Rivkin's Rebuttal
- Exhibit 2 Email to Robert Meek and opposing counsel with copies of the November 6, 2023 filings dated Sept. 6, 2023
- Exhibit 3 Proof of Mailing the Sept. 6, 2023 supplemental brief to opposing counsel

sheet for Kelly v PA ODC, 22A478

124th Affidavit, regarding unaccountable Nov 6th Supplemental Brief, and other documents the US Supreme Court did not file, and PA Supreme Court filings not docketed

- Exhibit A filings in red not accessible to me on the electronic filing system

- Exhibit B , Petitioner Meghan M. Kelly's Motion for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to Rule 12(2), 29(1), and 39(2), by the filing of one paper copy, and in addition to, or in the alternative of, permission to serve the United States Supreme Court electronically without a paper copy for future filings, due to costs relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court's to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness submitted to the US Supreme Court but not docketed and letter of return

- Exhibit C Petitioner Meghan M Kelly's Motion for permission to use electronic filing before this Honorable Court, even if my active license to practice law is suspended, in representing myself, in appeals of State Disability Proceedings and in a potential Disability proceeding before this Court, and in all proceedings I act pro se in, including civil rights proceedings and for a waiver of the paper original requirement, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights was similarly rejected for filing per the attached letter.

- Exhibit D undocketed Petitioner Meghan Kelly's Motion for Leave to file Different in Forma Pauperis Motion to waive costs due to utter poverty, and due to foreseeable costs creating a substantial burden upon Petitioner's access to the courts and forced violation of her religious beliefs by threat of indebtedness

- Exhibit E undocketed Petitioner Meghan Kelly's Motion to exempt costs and waive Court fees under Supreme Court Rules 38 and 43 eliminate people lawyers and people judges by creating a foundation of immunity from debt or responsibility

- Letter to the US Supreme Court invoking the 5th Amendment wherein the US Supreme Court indicated they did not want any more boxes and to stop sending them reciprocal discipline or disciplinary documents. The Court indicated my invocation of the 5th was sufficient.

- Law review article where the US Supreme Court accepted multiple petitions for rehearing and sua sponte accepted previously denied petitions by reopening cases

- Email to opposing counsel

127th Affidavit regarding Supplemental brief properly filed in accordance with Rule 25.6.us Supreme Court on 11/6/23. As of 11/20/23 case manager I have not received acceptance or a letter outlining the deficiency and opportunity to cure in accordance with case law. Discovered another petitioner appeared to be denied access to the courts by the US Supreme Court in contravention to the 1st Amendment based on viewpoint of speech contained in petitions, I attached as exhibit to 127th Affidavit hereto

133rd Affidavit regarding the Petition for a rehearing on the Supplemental brief for the PA matter, and exhibits thereto relating to removal of items I filed on the docket and deprivation of access to the courts fully and fairly by changing the pleadings or not docketing them

Exhibit 1 email to US Sup Ct staff and opposing counsel missing 127th Affidavit and 127th importance

Exhibit 2 Docket showing 127th affidavit is missing

Exhibit 3 electronic filing view my side of Dec 7 filings for a rehearing on the Nov 13, 2023 Order.

Application to place exhibits back on the docket US Supreme Court Case No. 22-6783, Application No. 22A747, Kelly v Swartz et al, Appellant Plaintiff Meghan Kelly's Application to the Honorable Justice Alito to place removed exhibits back on the Docket to prevent the deprivation of her 5th Amendment Equal Protections and procedural due process right to a full and fair opportunity to be heard without selective, arbitrary, disparate, unfavorable treatment towards her as applied

Part 2 Second different motion for an interim stay in US Supreme Court Case No. 22-6783, Application No. 22A747, Kelly v Swartz et al

Exhibit 5 Email Dec 9 and attachments thereto showing removed items in my pleading an emergency application to Justice Alito to expedite consideration of an application in Kelly v Swartz, et. al, Case Number 22-6783. in the record, the first exhibit 1 shows the pleadings as I filed them in papers and electronically, the second docket page at Exhibit 2 shows 6 items removed. The third docket page at Exhibit 3 shows Clerk Meek appeared to make partial not complete adjustments in response to my request. Also attached an email by Attorney Yin Tao Xao providing evidence documents were changed, removed or not docket in violation of the 1st Amendment access to the courts based on viewpoint of speech contained in her petitions, to correct court staff which relates to Kelly v Trump and my assertions before this US Supreme Court that it is bound by the Constitution and must uphold the Constitution by curing defects by its own agents to uphold the law and the courts not to destroy the courts or its staff

Exhibit 6 1 copy of Dec 2023 filing returned by letter dated Dec 5, 2023

Exhibit 7 Allstate alleviated warranty concern

Exhibit Appellant's Motion to withdraw her Petition before Judgment169th Affidavit and Application to Justice Jackson, since relief if granted will be too late in US Supreme Court No. 22-6783, Application No. 22A747 Kelly v Swartz, since my right to access to the US Supreme Court was already vitiated for the original disciplinary proceeding due to delays in docketing (Emphasis intended) intended)

152nd Affidavit dated Jan 16, 2024, USSC sent me someone else's pro se filings and the Eastern District Court papers in error/Not the Nov 6 PA papers/Case Manager will correct error by resubmitting my application to Chief Justice Roberts in Eastern District of PA case/Looks like the court erred in not reviewing the pet for pages in our civil rights case by the note no IFP when I filed one/Meg preserved rights to resubmit or for review of app by a full court should Chief Justice Roberts deny her resubmission/Meg requested 60 days should it be rejected/attached letter not ripe in Exhibit 1

153rd Affidavit dated Jan 17, 2024, Jan 3 filing resolution attempts/concerns with defense bill provision removing Art II Presidential power necessary to safeguard young troops/Disagree with fall of Rome theories and Merrick Garland's pursuit of death penalty despite his declaration of a moratorium re 123 Affidavit,

154th Affidavit Jan 18, 2024 regarding Chief Justice Roberts or the full court may be tempted to deny pages to cover up Court mistakes to make argument no prejudice by causing worse prejudice by denial of a fair opportunity to be heard, meg is scared

159th Affidavit Jan 24, 2024 US Supreme Court in bad faith with notice of my emergency application by letter to Robert Meek or in the alt Justice Roberts distributed petition to entire court for conference/They cannot distribute the papers they mailed back to me/they do not have them to give to each of the judges/.the emergency petition to Robert Meek is how I sought to cure defects the letter attached shows the court says it returned the papers I am in tears

167th Affidavit Feb 9, 2024 Richard Abbott filed beautiful appeal with two splits the court should hear/I did not know about one/Scary change by USSC on docket/Meg religious beliefs against enlightenment thinkers philosophies/the Vote to be used to argue representation means consent to debt slaves to allow a debt overthrow if Art 1 Sect 8, 14th Amendment arguments do not prevent as opposed to aid in it/Contract clause to be used to aide in overthrow after 2050 too/Meg is scared of US Supreme Ct/understands 10 million dollar jury case would scare the court/Yet partiality to self violates due process and equal protections especially under guise of common good or public good/I seek to preserve and protect the courts even when I correct them by upholding the Constitutional law that binds and sustains these United States/3rd Cir Granted extension to PACER

169th Affidavit Feb 12, 2024 regarding threat of defund to eliminate staff/Mitchell meant another way other than impeachment/Not Stuart case/Jan 23 not docketed or rejected without opportunity cure deny Meg's rights and access to courts in exercise of 1st Amendment right to petition/Court deleted extra entry it put on Friday which was scary/George Washington started global 7 year war additional evidence history channel/bad general causing conflicts instead of alleviating it to preserve precious troops' lives

171st Affidavit Feb 14, 2024 Meg religious beliefs/US Supreme Court on Jan 23 filing 3 plus weeks assert speedy decision under 6th Amendment, Court ignored and deprives of asserted rights/Forward Email to Richard Abbott Meg is serious and thinks he is an outstanding lawyer and the public would be at a loss without his service and

173rd affidavit February 15, 2024 regarding /Email asking why app to stay to discern if Richard Abbott was rejected/Meg received letter rejection/emailed meg disagreed and asked why I have not received an acceptance or rejection of Jan 23rd emergency filing necessary for tomorrow's conference, 23-24 days later/Meg is scared

175th Affidavit February 20, 2024, Meg was wrong US Supreme Court did not file emergency application Feb 16th but referred the matter relation back to Jan 24th which is not time to fully and fairly hear my petition/Court denied my pages I am in tears/Vote and money are tools of slavery to eliminate individual rights/Manner money is coined out of debt that cannot be paid is the vestige of slavery to sin which the courts may require to coin correctly to protect Constitutional liberty before new debt system eliminates all hope of courts restraining entities from eliminating the laws and the governments that safeguard Constitutional liberties/Catholic Church not magna carta indicated no money without consent through representative papal authority/ no taxation without representative consent is a pope doctrine not initially created by magna carta

End of attachments to referred to as one document herein (IFP)……1-40

TABLE OF CITATIONS

BIBLE

Acts Chapter 22…….16
Amos 5:15……..11
Ezekiel 18:13……12
John 2:16……....13, 35, 36
John 7:24……...…….5
Luke 23:22-24…….16
Mark 13:11…….13
Matthew 5:34……..18
Matthew 6:1-4……. 13, 18
Matthew 6:24…….18
Matthew 7:13-15……88
Matthew 12:34-38……..…85
Matthew 13……...……101
Matthew 16:24-26……..……84
Matthew 16:26…….……..…31
Matthew 23:23……..….12, 31, 52, 63, 85
Mark 7:6-13……12
Romans 1:25……...18

Book referred to in Exhibits or attached

1 C*hrles Alan Wright, Arthur R. Miller & Mary Kay Kane, Federal Practice and Procedure* § 2862……154

Article Robot justice: China's use of Internet courts By Tara Vasdani This article was originally published by The Lawyer's Daily (https://www.thelawyersdaily.ca/), part of LexisNexis Canada Inc…….See App. T-5

Article by the Venus project *How can laws be eliminated*……See App. T-5

Article by World Government Summit Could an AI ever replace a judge in court?, dated 2017……See. App. T-5

The Great Narrative for a Better Future, by Klaus Schwabb……See App. T-5

*Covid-19:The Great Rese*t, by Claus Schwab and Thierry Malleret, Portfolio Penguin Publishing, published 2020, by Forum Publishing, which may be found at https://carterheavyindustries.files.wordpress.com/2020/12/covid-19_-the-great-reset-klaus-schwab.pdf, (Excerpts of this Book in Exhibit D)……. See App T-5

The Great Narrative for a Better Future, by Klaus Schwabb……See App. T-5

The Fourth Industrial Revolution, by Klaus Schwab, 2016 version, excluding

additional pages of the 2017 updated version published by Portfolio Penguin, which may be found at https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ…….38, See App T-5

Shaping the Fourth Industrial Revolution By Klaus Schwabb, Founder of the World Economic Forum and Chairman with Nicolas Davis, Copywrite 2018, Published in the United States by Currency, an imprint of the Crown Publishing Group, a division of Penguin Random House LLC… See App. T-5

Other

Clericis laicos of February 5 1296, By Boniface enacted ……..15

Third Council of the Lateran met in Rome in March 1179. Pope Alexander III presided and 302 bishops attended where they declared law including *Canon 19* declaring excommunication for those who tried to tax churches and clergy without the consent of the bishop…….15

CASES

Allgeyer v. Louisiana, 165 U.S. 578, 589-590……..33
Axon Enter. v. Fed. Trade Comm'n, 143 S. Ct. 890, 894 (2023)……6
Bank of Am. Nat'l Tr. & Sav. Ass'n v. Hotel Rittenhouse Assocs., 800 F.2d 339, 343 (3d Cir. 1986)……...……21
BANK OF KENTUCKY v. WISTAR ET AL 28 U.S. 431 (1830)……..…..38
Borough of Duryea v. Guarnieri, 564 U.S. 379, 387 (2011)……..…15, 16, 20
Bush v. Rauch, 38 F.3d 842, 847 (6th Cir. 1994)……23
Caperton v. A.T. Massey Coal Co., 556 U.S. 868, 872 (2009)…….4
Carter v. Kubler, 320 U.S. 243……33
Centifanti v. Nix, 865 F.2d 1422, 1430 (3d Cir. 1989)…….…….21, 29
Cerame v. Bowler, Civ. 3:21-cv-1502 (AWT), at *4 (D. Conn. Aug. 29, 2022)……9
Deakins v. Monaghan, 484 U.S. 193, 108 S. Ct. 523, 98 L. Ed. 2d 529 (1988)……22, 24
Dent v. West Virginia, 129 U.S. 114……....33
Dr. A v. Hochul, 142 S. Ct. 552, 555 (2021)…….……..38
Elrod v. Burns, 427 U.S. 347, 374, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)…...…….40
Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 292–293, 125 S.Ct. 1517, 161 L.Ed.2d 454 (2005)…….….29
Faretta v. California, 422 U.S. 806, 95 S. Ct. 2525, 45 L. Ed. 2d 562 (1975)……..21, 27, 28
Freedom from Religion Found. Inc. v. New Kensington Arnold Sch. Dist., 832 F.3d 469, 490, 2016 U.S. App. LEXIS 14594, *49-5…….….21
Forrester v. White, 484 U.S. 219, 229 (1988)……..…23
Greene v. McElroy, 360 U.S. 474, 475 (1959)……...28, 33
Gunter v. Virginia State Bar, ex rel, 241 Va. 186, 187 (Va. 1991)…….7

In re a Member of the Bar of the Supreme Court, of the State Enna, 971 A.2d 110, 125 (Del. 2009)…….25
In re Discipline of Harding, 104 P.3d 1220, 1225 (Utah 2004)……..9
In re Oliver, 333 U.S. 257, 273……33
In re Paulson, 346 Or. 676, 705 (Or. 2009)……..7
Ins. Corp. of Ir. v. Compagnie Des Bauxites De Guinee, 456 U.S. 694 702-03 (1982)…..…26
International Shoe Co. v. Washington, 326 U.S. 310, 316 (1945)…….....26
In Re Murchinson, 349 US 133, 136 (1955)……3
In United States v. Ohio Power Co., 353 U.S. 98 (1957)…….....5
Isom v. Arkansas, 205 L. Ed. 2d 373, 140 S. Ct. 342, 343–44 (2019)…….3
See, Isaacs v. Caldwell, 530 S.W.3d 449, 455 (Ky. 2017)……..38
Joint Anti-Fascist Committee v. McGrath, 341 U.S. 168-169…….33
Kalman v. Cortes, 723 F. Supp. 2d 766, 769, (2010)……33
Kirby v. United States, 174 U.S. 47…….33
Licata v. U.S. Postal Serv., 33 F.3d 259, 260 (3d Cir. 1994)…….24
Liljeberg v. Health Servs. Acquisition Corp., 486 U.S. 847, 108 S. Ct. 2194, 100 L. Ed. 2d 855 (1988)…….5
Liteky v. United States, 510 U.S. 540, 114 S. Ct. 1147, 127 L. Ed. 2d 474 (1994)……23
N. Jersey Media Grp. Inc. v. United States, 836 F.3d 421, 434 (3d Cir. 2016)…….21, 28
Marbury v. Madison, 5 U.S. 137, 147 (1803)……..20
Mattox v. United States, 156 U.S. 237, 242-244…….…….33
Mayle v. Felix, 545 U.S. 644, 663 (2005)……30
May v. Anderson, 345 U.S. 528, 537 (1953)……22
McKaskle v. Wiggins, 465 U.S. 168, 186 (1984)……..21
Mistretta v. United States, 488 U.S. 361, 387 (1989)……...6
Mississippi State Bar v. Attorney-Respondent in Disciplinary Proceedings, 367 So. 2d 179, 183 (Miss. 1979)……10
Molina v. Pa. Soc. Serv. Union, 2019 U.S. Dist. LEXIS 120040, *27, 2019 WL 3240170…21
Morgan v. United States, 304 U.S. 1, 19……...33
Motes v. United States, 178 U.S. 458, 474……33
N. Jersey Media Grp. Inc. v. United States, 836 F.3d 421, 434 (3d Cir. 2016)……..…28
NetChoice LLC v Paxton No. 22-555……..12
Nixon v. Warner Commc'ns, Inc., 435 U.S. 589, 98 S.Ct. 1306, 55 L.Ed.2d 570 (1978)….21
Ohio Bell Telephone Co. v. Public Utilities Commission, 301 U.S. 292……..33
Parkview Assoc. Partnership v. City of Lebanon, 225 F.3d 321, 327-28 (3d Cir. 2000)…29
Pansy v. Borough of Stroudsburg, 23 F.3d 772, 780-81 (3d Cir. 1994)…….21
Pease v. Rathbun-Jones Eng. Co., 243 U.S. 273, 276 (1917)……22
Peters v. Hobby, 349 U.S. 331, 352……..33
Peters v. Kiff, 407 U.S. 493, 502 (1972), *Overruled in Gregg v. Georgia*, 428 U.S. 153, 169 (1976)……33
People v. Harfmann, 638 P.2d 745, 747-46 (Colo. 1981)…….10
Phillips v. Negley, 117 U.S. 665 (1886)……..38
Powell v. Pennsylvania, 127 U.S. 678, 684……33
Reed v. Goertz, No. 21-442, at *5 (Apr. 19, 2023)……..33
Reilly v. Pinkus, 338 U.S. 269…….33
Roocker-Feldman doctrine, derived from 2 cases, 1) Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923) and 2) *District of Columbia Court of Appeals v. Feldman*, 460 U.S. 462 (1983)..

U.S. 564, 570 (1973)……24-29
Rosenthal v. Justices of the S. Ct. of Calif, 910 F.2d 561, 565 (9th Cir. 1990)……9
Schware v. Board of Bar Examiners, 353 U.S. 232……..…33
Skinner v. Switzer, 562 U.S. 521, 532 (2011)……29
Slochower v. Board of Education, 350 U.S. 551; Truax v. Raich, 239 U.S.……33
St. L. S.F.R.R. v. Spiller, 275 U.S. 156 (1927)……...38
State ex rel. Frieson v. Isner, 168 W. Va. 758, 777 (W. Va. 1981)……....…….5-6
Rippo v. Baker, 580 U.S. 285, 137 S. Ct. 905, 197 L. Ed. 2d 167 (2017)……..…..…3-4
Sprint Communications, Inc. v. Jacobs, 571 U.S. 69,(2013)…….……22
Stokes v. Delo, 495 U.S. 320, 323 (1990)……..……20
Tanzin v. Tanvir, 141 S. Ct. 486, 208 L. Ed. 2d 295 (2020)……..……..21
The Palmyra, 12 Wheat. 1; Alviso v. United States, 6 Wall. 457. Rice v. Railroad Co., 21 How. 82..38
Tumey v State of Ohio, 273 US 510 (1927)……144
Tumey v. Ohio, 273 U.S. 510……4
United States v. Nixon, 418 U.S. 683, 703, 94 S.Ct. 3090, 41 L.Ed.2d 1039 (1974)……....15
Wetmore v. Karrick, 205 U.S. 141, 142 (1907)……...38
Williams v. Pennsylvania, 579 U.S. 1 (2016)……..……3-4
Younger v. Harris, 401 U.S. 37 (1971)…….……..22, 24, 25, 29, 30

CONSTITUTION

US Const. Amend I……1-40
US Const. Amend V……...1-40
US Const Amend. IV……..1-40
US Const. Amend. VI……8, 17, 20, 21, 27, 28, 30, 39-40
US Const Amend XIII……12, 25
US Amend. XIV……..1-40
US Art III……6, 26

Executive orders

E.O. 13798……34-37
Ex. Or. No. 13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021……34-37
Ex. Or. No. 13199, Jan. 29, 2001, as revoked by Ex. Or No. 13831, May 3, 2018….34-37
Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010……..34-37
Ex. Or. No. 13559 Nov. 17, 2010…….……34-37
Ex Or. No. 13831, May 3, 2018.....34-37
Ex. Or. No. 14015, Feb. 14, 2021…

FEDERAL STATUTES

CFR § 2200.68……5
28 U.S. Code § 144 ……4,5, 23
28 U.S. Code § 455……5, 23

28 U.S.C. § 1253……...1
28 U.S.C. § 1254……...1, 2
28 U.S.C. § 2106……....1
42 USC §1983……..……2-21
42 USC §1985…….……2, 21, 24, 32
42 USC §1988…….2, 21, 24, 32
42 U. S. C. § 2000bb-1 through 4 Religious Freedom Restoration Act……19, 31, 34, 38

FEDERAL RULES OF CIVIL PROCEDURE

Fed. R. Civ. P. Rule 15 …….2, 21
Fed. R. Civ. P. Rule 52……32, 36, 39
Fed. R. Civ. P. Rule 59…….32, 36, 39
Fed. R. Civ. P. Rule 60……32, 36, 39

STATE REGULATIONS

Del. Law. R. of Disciplinary Proc. Rule (also "DLRDP Rule") 1 (a)……2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 5…..2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 7(d)……2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 8…….
Del. Law. R. of Disciplinary Proc. Rule 9 (d) (2)…… 2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
DLRDP Rule 9(d)(3)…… 2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 10…….2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 12 (h)…… 2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Delaware Rules of Disciplinary Procedure, Rule 13…2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Delaware Rules of Disciplinary procedure Rule 14…2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 18……2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 19 (a).. 2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 19 (c)…… 2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 19 (d)… 2-10, 17, 21, 24-25, 27, 29, 30, 32, 38
Del. Law. R. of Disciplinary Proc. Rule 19 (e)…… 2-10, 17, 21, 24-25, 27, 29, 30, 32, 38

IN THE UNITED STATES SUPREME COURT APPEAL OF THE ORDERS BELOW BY THIRD CIRCUIT COURT OF APPEALS

The opinions and orders of the Third Circuit Court of Appeals ("3rd Cir") to review the merits appears at Appendix ("App.") A entered 6/30/23, App. B entered 4/20/23, App. C entered 6/22/23, App. D entered 6/20/23, App. E entered **7/10/23,** App F entered 3/15/23, App. G entered 1/6/23, App G and, App H entered 2/9/23. The opinions do not appear published.

I also appeal the District Court Orders the Third Circuit affirmed Order with a Memorandum opinion dated 11/2/21 at App. I, an Order with a Memorandum opinion dated 12/22/21 at App. J, an opinion and a Memorandum Order dated 4/26/22 at App. K., a memorandum order dated 12/28/23 at App L and an order granting ECF access and an exemption to PACER fees dated 1/5/23 at App M.

I. ORDERS AND OPINIONS

The date on which the highest state court decided my case is 4/20/23. A copy of that decision appears at App. B. The Court ("Ct") denied a motion of reargument on 6/22/23. The date the court decided my motions relating to recusing Judge Scirica is 6/20/23. The court denied a motion for reargument on **7/10/23**. On 1/8/2024 this Court rejected my petition[1] for more pages and pet. On 1/12/24 this court granted 60 days to file this pet by or before 3/12/24.

II JURISDICTION

The jurisdiction of this Court is invoked under 28 U.S.C. § 1254 or in the alternative under 28 U.S.C. § 1253, and 28 U.S. Code § 2106.

III CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Pertinent statutory provisions are reprinted in the appendix to this brief, App 1-A.

V STATEMENT OF THE CASE

[1] Petition ("Pet")

Pursuant to 28 U.S.C. § 2106, US Amend I, V, VI, XIII, XIV, 42 USC §§§ 1983, 1985, 1988 and common law and state authority I ask this Court to safeguard the 1st Amendment[2] right[3] to petition, coupled with its conjoining 5th and 14th Am. rt[4] to Due Process ("DP") affording me meaningful opportunity to fairly be heard on petitions to protect my life, liberty, property interests in license to practice law, reputation, economic relationships and the ability to buy and sell from vitiation but for my religious beliefs in Jesus contained in my speech in the petitions by vacating the decisions by the 3rd Cir[5] and the Delaware District Courts[6] below dismissing my Complaint, denying by not addressing the Motions to amend the complaint (DI 43)[7], and subsequent rolling motion(s) to withdraw the initial Motion to amend the Complaint to amend the Complaint once as a matter of rt to include all parties, newly discovered evidence, facts and additional claims on the record, and all previously denied or ignored ripe motions as an abuse of discretion by remanding this matter back below with opportunity[8] to be heard before vitiation of my asserted 1st, 5th and 14th Am rts by the District and state courts.

I further request that 3rd Cir orders be voided based on procedural PD violations applicable[9] to 3rd Cir via US Am V by denying me a fair and impartial proceeding by permitting both Judges Scirica and Phipps to participate in orders below, and order them recused from the

[2] Amendment (herein also referred to "Amend" or "Am')
[3] Right ("rt") Rights ("rts")
[4] Right or rights ("rt" or "Rt")
[5] (Third Circuit Docket Item ("3DI") 3DI 205, 182, 181, 204, 203, 211, 168, 131, 132, (Collectively "3rd Cir. Order" or "3rd Cir.") Attached App. A-H
[6] District Court Docket Item ("DI") DI 111, 106, 59-60, 30-31, 16-17 (collectively, "District-Order"). Attached App. L, K,J, I, M, respectively.
[7] I did not have PACER access at the time of submitting the amended complaint and Motion to amend the complaint on 1/24/24 once as a matter of right, but accidentally did not mail out the signature page. So, I did not know the signature page was missing, similar to the signature page was missing in the original complaint based on a staff error that was soon corrected. On 4/26/24, I moved the court to amend my complaint as a matter of right to conform the complaint to the facts of the case in a rolling Motion. DI 58, and continuously moved to add new evidence reserving my right
[8] Opportunity ("oppty")
[9] Applicable ("app")

matter further given the partiality both men have to serving their own personal interest which is in opposition to mine. I ask for additional relief herein regarding the Constitutionality of regulating the US Supreme Court[10] which this Court may open *sua sponte* even if this pet is denied, with or without me in toto[11], to safeguard the rule of law that founded this nation and sustains and maintains these United States from schemed dissolution.

Trump twice placed Phipps on a list of potential nominees for USSC. Phipp's has a personal stake in punishing me for suing Trump. If elected Trump will likely appoint him as a justice of the USSC. I seek to preserve the rt to pet against Trump by voiding *Kelly v Trump* below based on procedural PD violations, and seek additional claims for DEs'[12] interference in the case and retaliation against me for suing Trump to dissolve the establishment of gov-religion which substantially burdens my religious exercise. Phipp's increases the material benefits he may gain by ruling against me and in favor of the state based on DE's attacks against me for suing Trump. Judges may not be biased proponents of one party before them while discriminating against the other party me in violation of the 5th Am Equal Protections component, regardless as to whether the judge is consciously aware of the temptation created by the conflicts of interests. Under objective standards in my case, "the probability of actual bias [by Phipps] is too high to be const tolerable." [13] An ordinary person in Phipps' place would be

[10] US Supreme Court ("USSC") Supreme Court ("Sup Ct") f

[11] This Court may reopen the case even if I am taken out, killed or otherwise eliminated with a waiver based on elimination for opportunity to be heard so long as the opposing party rights are preserved to attack my arguments herein. There is a schemed overthrow. The court must protect the people's check upon it, the petition to guide and empower the Court under Art III authority to save itself or the country will be dissolved. It is complicated. I do not have room or time to explain.

[12] Defendant ("DE" or State)

[13] Citing, Rippo v. Baker, 137 S. Ct. 905, 907 (2017); See, Isom v. Arkansas, 205 L. Ed. 2d 373 (2019) (At the same time, the Court has acknowledged that "[a]llowing a decisionmaker to review and evaluate his own prior decisions raises problems," Withrow, 421 U.S. at 58, n. 25, 95 S.Ct. 1456, perhaps because of the risk that a judge might " 'be so psychologically wedded to his or her previous position' " that he or she will " 'consciously or unconsciously avoid the appearance of having erred or changed position.' " Williams, 579 U. S., at ——, 136 S.Ct., at 1906 (quoting Withrow, 421 U.S. at 57, 95 S.Ct. 1456). And it has warned that a judge's "personal knowledge and impression" of a case may sometimes outweigh the parties' arguments. In re Murchison, 349 U.S. 133, 138, (1955).)

biased against me based on the benefit my loss in the case would potentially allow them to gain, a potential nomination to be a USSC justice. Similarly, Scirica is the chair of the Committee on Judicial Conduct and Disability. He works on drafting the rules in judicial disciplinary proceedings I seek to vitiate. An average judge in Scirica's position is not likely to be neutral. I seek to destroy and harm his personal work product, which may vitiate a pecuniary gain in terms of honor and power to draft rules that bind the courts. So, he has much to lose should I win.[14] The failure to recuse them violates PD and 28 U.S. Code §§ 144, 544. The conflicts of interest are so great as to deprive me of a fair oppty to be heard. US Amend I, V The failure to recuse them violates PD and 28 U.S. Code §§ 144, 544. These two judges ruled against me in all orders. They also created obstacles to my access to the courts by denying a stay and rapidly ordering a hearing date prior to briefing so as to prevent this US Sup Ct from hearing my Pet for writ of Cert before Judgment to stay the case to prevent me the oppty and means to appeal the DE Disciplinary ("Disc") matter to this USSC before it was too late to grant relief making it impracticable and impossible.[15] I was prejudiced by the deprivation of underlying rts and a fair oppty to be heard by a biased partial forum. Neither judge recused themselves per my request. "The *Tumey* Court concluded that the DP Clause incorporated the common-law rule that a judge must recuse himself when he has "a direct, personal, substantial, pecuniary interest" in a case. Ibi"[16] In this matter, Judge Phipps' and Scirica's direct, personal, substantial, pecuniary conflict of interests in opposition to my claims is too prejudicial to my case to afford me a fair proceeding. US Amend I, V. "A fair trial in a fair tribunal is a basic requirement of DP."

[14] Williams v. Pennsylvania, 195 L.Ed.2d 132 (2016).)

[15] The right to pet includes my asserted right of the courts to prevent obstacles to petition in other cases without intentional malicious obstruction to my access to petition in other courts in retaliation for my request by exacerbation of the pressure below to increase the obstacle to deny me 1st Amendment right to petition fairly under in accordance to due process in other courts. The 5th and 14th Due Process guarantee includes the right to be heard on pet.

[16] Caperton v. A.T. Massey Coal Co., 556 U.S. 868, 876 (2009); Also see Peters v. Kiff, 407 U.S. 493, 502 (1972)

Murchison, supra, at 136, 75 S.Ct. 623 *Id.* Judge Phipps' and Scirica's participation violated DP. The Federal Rules of Civil Procedure treat orders that are entered without DP as void. US Amend V. *Gee v. Texas*, No. 3:18-cv-2681-G-BN, at *6 I was deprived of a fair oppty to be heard. Accordingly the orders below should be voided. It was clear error of law for Judge Scirica and Judge Phipps to fail to disqualify themselves in this proceeding.[17]

It is unfair to require judges recuse themselves as to admit before the world they cannot be fair in light of certain apparent interests as opposed to require the entire court or a panel to make a determination similar to the above rational based on procedural DP and Equal Protections grounds where there is favoritism towards one party as opposed to another. Judges may be unconsciously defensive to attacks so as to unjustly not recuse themselves because they care more about appearance instead of truth.[18] Other times attacks concerning recusal are unwarranted like the ones in the news against the USSC members for relationships that are common to all men, where recusal would deprive the public of diverse judicial views which gives the court clearer vision of the bigger picture to resolve issues fairly. Similarly judges become partial and biased towards regulators and regulations which inhibit their ability to uphold the impartial application of the Const[19] to the rule of law. Accordingly, I request the court consider on remand or herein ruling federal judges may only be disciplined within the purview of const limits of 1. Cases and controversies or 2. Impeachment without waiver in order not to violate my rt to a fair impartial proceeding as applied to me. Thus 28 U.S. Code §'s 144, 351-358, 455 and 29 CFR § 2200.68 are unconst.[20] *State ex rel. Frieson v. Isner*, 168 W. Va. 758, 777 (W. Va. 1981) ("It

[17] 28 U.S.C.A. § 455(a). Liljeberg v. Health Servs. Acquisition Corp., 486 U.S. 847, 108 (1988)
[18] See, John 7:24 ("Do not judge by appearances, but judge with right judgment."
[19] Constitution, Constitutional, Constitutionality or Constitutionally (herein referred to as ("Const")
[20] . This Court may reopen that case sua sponte to save itself regardless as to whether it agrees or disagrees with me. I believe the courts are in trouble, without you there is no rule of law that safeguards our freedoms. In United States v. Ohio Power Co., 353 U.S. 98 (1957) ("Certiorari denied October 17, 1955. Rehearing denied December 5, 1955.

cannot be questioned that the **Legislature** cannot restrict or **impair the power of the judiciary to regulate the practice of law** by enacting a statute permitting or authorizing laymen to practice law") This Sup Ct reconfirmed a holding in *Mistretta v. United States*, 488 U.S. 361, 387 (1989), "Congress has undoubted power to regulate the practice and procedure of federal courts, and may exercise that power by delegating to this or other federal courts authority to make rules not inconsistent with the statutes or const of the United States." Consider a case and controversy the means to discipline, correct and safeguard justice and the members who partake in upholding it from insidious attacks like the attacks against me, and the new attack 3/5/24. I will be selectively attacked again unless the federal courts restrain the state from infringing on my asserted Const rt to pet to secure freedom to worship Jesus without gov persecution. I have been attacked by the state through the Courts and its private and public partners for about 20 years as outlines in the footnotes. Even if this Court should find my religious beliefs repugnant or disagree with my ideas I am still protected under the 1st Am to religious beliefs that does not conform to the accepted doctrines of the majority. On 4/14/23 this USSC issued a unanimous opinion holding that federal district courts can consider const challenges to administrative proceedings before such agencies issue final rulings. *Axon Enter. v. Fed. Trade Comm'n*, 143 S. Ct. 890, 894 (2023). Since the state's most recent attack against me occurred on 3/5/24, I am going to be attacked and harmed more by additional disc proceedings in retaliation for exercising my asserted Const rts unless this Ct safeguards my freedoms. I prefer this Ct also safeguard itself and the freedoms of other professionals who like me may be prevented from buying and selling but for their religious beliefs or exercise of other rts.

This Court should also consider the numerous splits after remand. Courts are split on

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Rehearing again denied May 26, 1956. Order denying rehearing vacated June 11, 1956. Rehearing and certiorari granted and case decided April 1, 1957)

whether judges and lawyers give up a number of Const rts in exchange for the license to practice law in Board proceedings. For example in *In re Paulson*, 346 Or. 676, 705 (Or. 2009) allows "an accused lawyer in a disciplinary ("disc") proceeding is entitled to seek discovery through requests for admission, production of documents, and the use of depositions." Whereas in Virginia there is no rt to perform discovery.[21] There will be disparate treatment of this USSC should it succumb to pressures to allow judicial members to be ruled over by bureaucratic boards in disc proceedings resulting in injustice. At least consider remanding the case below to allow me to go through different splits this honorable Court may resolve instead of disc boards who care more about maintaining their appearance and positions by potentially sacrificing their peers than doing what is rt. If not, this Court may address the question whether disc rules, violate the Const as applied to the USSC Justices. I also seek to eliminate disc proceedings as applied to attorneys and federal judges but have unique special concern about this Court I should be able to pet on below. I also brought const challenges against the certain rules and Const challenged the proceedings themselves as applied to me, and generally as applied to all lawyers. Nevertheless, it is important to point this out to the court since I have alleged facts on the record that there is an attack against the judiciary to eliminate it, to eliminate the Const law that founded this country and the laws maintain and sustain these United States. In recent times the USSC has been under attack by congress and lobbyists who seek to pressure to control them through regulating them in disc proceedings I oppose. Please consider the arguments I made and preserved on the record below. I have a number of Const challenges to 1. the attorney/judicial proceedings, 2. a number of specific disc rules, and 3. other Const challenges based on splits in the jurisdiction concerning

[21] Gunter v. Virginia State Bar, ex rel, 241 Va. 186, 187 (Va. 1991) held "An attorney has no procedural due process right to discovery in a disciplinary proceeding."

what Const rts lawyers and attorneys have. The courts are all over the place on whether Const rts apply to lawyers and judges or **whether their own rules apply to me and Richard Abbott.**

DE Disc Rules provides the accused's rts in its rules. Yet the State deprived me and Abbott of rts under the state's Disc Rules.[22] Then in opinions DE Sup Ct members fraudulently cite the rules offered protections to hold those rts were so protected in both Abbott and my case when they were not. For example Disc R 9 (d)(3) Dis R Provides:

> "The Administrative Assistant shall serve a notice of hearing upon the ODC and the respondent, identifying the members of the Board assigned to the matter, and the date and place of the hearing. The notice shall be given at least **20 days** in advance of the date of the hearing. The notice of hearing shall state that the respondent is entitled to be represented by a lawyer at the respondent's expense, to **cross-examine** witnesses, and to present evidence."

Both Abbott and I filed motions to gather and present evidence. We asserted rt to equal protections and DP and our 6th Am rt to call witnesses and to cross examine our accusers and other witnesses in quasi-criminal proceedings. All pets were rejected in violation of DP. We both were deprived of rts under Rule 9(d)3, and other rules' and Const asserted protections. We were denied the asserted rt to perform discovery, call witnesses and cross examine our accusers because the Court fired them in my case and hid that fact, and I had no idea Abbott had 17 or so subpoenas quashed. Richard and I not only have a rt under Dis R 9, but a 6th Am rt app to the state via the 14th Am. to cross examine witnesses and a 1st Am rt to pet via the 14th, and 14th Am. state rt to a meaningful oppty to prepare and present our case. Our rts were violated by DE. Other attorneys are similarly deprived of a fair proceeding in other states capriciously by the

[22] Richard Abbott has an appeal before this USSC. I filed the attached App to Alito to stay this case pending a determination of Richard's matter. While I have religious objections when lawsuits are brought against me. I do not necessarily object when I am the Plaintiff so as not to violate Jesus's teachings. It is distinguished. On 3/5 the law librarian removed my research privileges. Poverty causes a burden to my access to research to meaningful assert my 1st Am rt to Pet and 5th Am. Due process rt to be heard fairly and meaningfully. I pray this court overturns his matter at 23-855 and grants my petition so he may possibly represent me.

whims of professional bureaucrat's partial towards business as opposed to the impartial application of the const to the rule of law which prevents freedoms from being sacrificed for business. There are **splits** between the courts and Circuits as to whether lawyers have the 6th Am rt to cross examine their accused in disc proceedings. [23] I did not know there was a split in jurisdictions where some courts say hey lawyers you do not have a 6th Am rt to cross examine witnesses until I saw the similarity in Abbott's case which caused me to look and to reach out to him. For eg., Conn. grants lawyers this rt, but the 9th Cir. does not. Id. I think it imperative for the USSC to resolve the split so professionals including lawyers are not deprived of Const freedoms for business of boards who sacrifice them to market their positions to maintain profit streams at the cost of human sacrifice of lives and liberties for the bottom line, unrestrained by the just rule of law unless this Court steps in. When the courts deem business preempts freedom, or business is freedom, there is no freedom. Everything is for sale. Lives and feigned liberties are bought, and the Const is a lie not enforceable by the government when government officials wrongly hold they are immune to the law and above the law like Former President Donald Trump appears to do. It is folly to say the courts have no competence to judge whether the other branch violated the Const for security reasons. That makes Presidents' rulers, not servant leaders safeguarding liberties. Courts eliminate liberties when they hold the other branches or their own branch are above the Const laws that safeguard the people from the government enslaving or

[23] This court grants right to confrontation under the 6th Amendment. "Both the disciplinary counsel and the respondent "shall be entitled to examine or cross-examine witnesses." Cerame v. Bowler, Civ. 3:21-cv-1502 (AWT), at *4 (D. Conn. Aug. 29, 2022); *In re Discipline of Harding*, 104 P.3d 1220, 1225 (Utah 2004), held, "These measures are adequate, given the nature of lawyer discipline proceedings, to ensure due process to a lawyer accused of misconduct. **Direct and cross-examination of the witnesses is not required in the quasi-administrative setting of the screening panel**. As a result, we find no due process deficiencies in Harding's case."
The 9th Circuit is terrible it eliminates a number of Cons rights not merely the 6th Am right to confrontation. See, *Rosenthal v. Justices of the S. Ct. of Calif*, 910 F.2d 561, 565 (9th Cir. 1990) ("We reject Rosenthal's confrontation clause claim. The confrontation clause is a criminal law protection. Therefore, it does not apply to a disbarment case."); Id at 564 ("The principle of presumption of innocence is a creature of a criminal proceeding; and hence, does not apply in a lawyer disbarment proceeding. ");

sacrificing them for moth and rust. [24] While government is not above the Const law, even Trump, the government is not below the law either. The Const protects federal judges and members of the USSC too. There are more splits on other Const rts attorneys have in disc porceedings. This Court must examine the Courts holding lawyers **and judges** below the Const laws that protect the rts of all professionals which should not be eliminated in exchange for a license especially the freedom of religious belief in my case. [25] I have Const challenges to state Disc rules like 13-14, 18 and other Const challenges I did not have an oppty to pleading full by amending my complaint despite moving District Court to consider the same once as a matter of rt on remand at DI 58 and elsewhere. I request oppty to argue it below first before it is decided in this court. So I am not deprived of a fair oppty to pet and present my case in accordance with DP. US Am 1, 5th, 14th

The gov [26] through the courts have deprived me of 1st Am rt to access to the courts app to the state via the 14th Am; and the corollary 5th and 14th Am DP rts to oppty to be heard in fair and impartial forums not partial towards the courts or the gov in violation of the 5th and 14th Am Equal protections component for about 20 years. Violations of access to the courts in this case

[24] I disagree with this court's decision by delegating its power to say what the rule of law is with regards to permitting congress a political partial biased unjust forum who constantly degrades the law with horse and pony shows based on partiality to their own seats and the people that place them there instead of the impartial rule of law in the Colorado ballot case. Yet the right to petition is the people's check. Should this Court err and another threat of insurrection incited by a president occurs a petitioner my come forward to distinguish the case and ask this US Supreme Court to be our hero by preserving the Const rule of law that maintains these United States from Dissolution. . We are not stuck because the law grants people the power to place checks on the gov when it makes mistakes too. Do not feel stuck. 4

[25] The court in Mississippi State Bar v. Attorney-Respondent in Disciplinary Proceedings, 367 So. 2d 179, 183 (Miss. 1979) seeks to eliminate USSC holding in Spevack extending 5th Amendment protections against self-incrimination to lawyers in disciplinary cases. People v. Harfmann, 638 P.2d 745, 747-46 (Colo. 1981) held, "We disagree with the respondent's contention that disciplinary proceedings, which are sui generis, must be afforded the same const safeguards which are provided to an accused in a criminal case. People v. Harfmann, 638 P.2d 745, 747 n.6 (Colo. 1981) held, "We conclude that the exclusionary rule should not be extended to provide a shield to a lawyer charged in a disciplinary complaint." But some courts grant due process like *Phelps v. Kansas Supreme Court*, 662 F.2d 649, 650 (10th Cir. 1981) appear to do unless they simply cite the rule under the guise the rule was followed when it was not upheld like was violated in Richard and my case.

[26] Government (referred "gov")

includes **petitions to the Court about deprivations of my access to the courts caused by the Court I pet** who violate my 1st Am rt to pet again by denying me access concerning the denials of access. This double denial of the access to the courts also violates my 5th and 14th Am Proce DP rts app to the federal and state courts by vitiating my oppty to be heard in a fair impartial forum, with notice, oppty to prepare and present evidence **before the courts** deprive me of the underlying rts I pet to secure life, liberty, i**ncluding the 1st Am rt to pet,** or property. The Courts arbitrary exercise of its powers as applied to me violates DP. It is not okay for courts, including this USSC,[27] the State-Court and DE to deprive me and other people of access to the

[27] When I contact this US Supreme Court, it is to petition to safeguard my rights and to safeguard the rule of law. I do not seek to destroy the court or the staff. Nevertheless, the court wrongly is defensive. Jordan Bickell hung up on me twice while preventing me from speaking to explain the need of the paper documents sent back to me which are part and parcel to the petition for leave for additional pages since I incorporated them in their entirety as attachments thereto by reference. Moreover, other staff members hung up on me as I sought to return another party's documents that were sent to me in error, and another time to gain clarity on efiling discrepancies. Mistakes happen, and Const defects occur which make court staff invaluable and necessary to uphold the fair administration of justice. Nevertheless, I should not be deprived of access to the courts because the court is scared of accepting petitions to correct mistakes I allege it makes, including the 11/6/236 petition and the 1/23/24 petitions which were neither accepted nor rejected or returned, and other pleadings I aver were rejected without a lawful purpose so as to obstruct my access to the courts. US Am I. Do I seek to destroy the courts? Absolutely not. The courts are the only branch that safeguard freedoms, individuals and individual liberties. Whereas the vote is a tool to eliminate individual rights under the legal fiction the people's participation in it is a collective compromise allowing for human sacrifice of life and liberty if unrestrained by the courts by the application of the Const to the rule of law. I oppose the Enlightenment thinkers' theories of social contracts where people's souls are bought and sold as human commodity slave products by governments. Our nation is founded by law, the Const law, not social contracts that buy and sell souls of men who are no longer free but slave chattel. I disagree with the imperfect founders' thinking too. They relied on Enlightenment thinkers who taught men, their creation, and their desires, alleged natural laws are their master and guide. See *Romans* 1:25 I believe the natural man is without eternal life. I believe we are all born enslaved to lawless lusts called sin in need of being born again into eternal life to escape the second death in hell. The natural man lives based on desires to be enslaved by those who tempt his desires not free. The spiritual man lays down his desires to discern what is right and does not give into temptation to be controlled by those who entice his desires by reward or threat of harm. The spiritual man seeks to overcome lusts to love unconditionally required by respecting the dignity of others. Thankfully the Const and statutory laws are the law, not imperfect fallible men who decreed traditions which violate the purpose of the law to protect life and liberty, not sacrifice them for the whimsical desires, convenience, profit, avoidance of costs, or other vanity of men.
The Equal Protections component requires the government to protect the liberties and lives of men who do not conform to the mob's convenience, materiel gain or beliefs of the community or mob as more precious than mammon. *Matthew* 6:24. That is why the Court's application to the rule of law to protect the treasure of life and liberty of even minorities or those the majority abhors makes us all freer from the threat of a tyrannical rulers who compel all to be enslaved to conform to the majority mob's representative compelled belief, and exercise of belief through the vote, or under the new system by forced compliance to be controlled by those who control the resources and the channels to gain them. I believe this required unearned respect towards the dignity of other people's lives and liberties, saves not only lives but eternal lives from hell by preventing human sacrifice and enslavement under the guise of the common good, public good or the welfare of the world. *Matthew* 23:23.*Amos* 5:15. Collectively and

conditionally we can do no good by unconditional love. Only individuals can reflect the image of God. Organizations, associations, businesses, charities, religious forums may only conditionally care about certain people or interests to be controlled not free by those who entice those interests and concerns by reward or threat of harm to bend the representative bodies no longer free will to the dictates of outsiders who control them. This is the mark of sin unrestrained by law, love or the holy spirit convicting people of lawlessness when they harm or oppress others to serve their own. This is the mark of the beast which is simply sin that this Court may restrain with the just ruel of law to prevent the people from harming one another for collective gain, dying to lose eternal life in hell fro committing human sacrifice of lives and liberty for mammon. *Matthew* 6:24.

Is there a new economic system and a plan to eliminate the courts after 2050. Yes.

Am I upset listening to the US Supreme Court's case regarding the elimination of liability by those who control the channels of exchange who take over to eliminate the courts and the rule of law in matters like *NetChoice LLC v Paxton* No. 22-555. Yes? Section 230 empowers those who have a conflict of interest in that their aim is to serve what I believe is the mark of the beast greed at the cost of human sacrifice of life or liberty (cutting off speech) unrestrained by the courts by grant of immunity to take over the courts down the line by controlling the channels of exchange, internet forums.

New structures are created by law including the beneficial corporations and beneficial entities which enable the new carbon credit debit economy to eliminate the profit driven economy by force. While I oppose a government compelled economy which stifles innovation, and prefer governments govern and guide not collude to control the no longer free people with the limit of just laws that prevent businesses and charities or not for profits from enslaving, killing stealing and destroying human life and health by subpar goods and services made to oppress, made to break repair, borrow or replace, I oppose the new system that will allow for the rule of law to be eliminated under the deception of freedom by partaking in the digital system by compelled force or lose the necessities of life.

The courts are empowered to safeguard the rule of law by stating what it is not based on traditions, but based on justice to protect what the Const alleges is the treasure the lives and liberties of the people. *Mark* 7:6-13 (Jesus teaches we nullify the law by traditions under the guise of law)

Where are the eyes of the people looking? Are they looking with love towards the people and their liberties or are their eyes evil looking at money, and material gain as the treasure so that they would sacrifice the lives and liberties of the people for mammon as master. *Matthew* 6:24. US Am I, V, XIII, XIV.

If you look at the PA appeal and pull the 93rd affidavit you will see that I have the courts back. I was ready to sue Biden and Yellen should Courts not be paid in violation of the Equal Protections clause applicable to them via the 5th, since the other two branches are paid, the 13th Am, and other laws applied to me referred therein. I should like this court to consider this. I included ideas on how to prevent an intentional debt overthrow in my complaint attached hereto.

The manner money is created is the problem, which may be resolved by the courts. Money is coined is to enslave the government and the people in violation of the 13th Am, and against my religious beliefs as a party of one against debt, US Am I. The federal government borrows money from the federal reserve who makes it out of nothing and charges interest to enslave and control the no longer free and independent government who in turn gives this money to private and foreign partners in an unfair controlled market by controlling who gains grants and contracts based on material gain which stifles innovation by freedom of thought and criticism by forced subpar standardized goods which sustain the pain to sustain the profit streams, and need for more and more research to sustain positions.

Then the debtor government, enslaves the people to pay back what is borrowed which cannot be paid back by design. So, the taxes are used to pay interest on debt into infinity on money that does not exist. Each Dollar is an I owe you with interest owed to the banks. The money in interest does not exist in dollars. Money is created out of nothingness by the federal reserve lending out what it does not have, enslaving the people to pay back what does not exist in full.

The problem is exacerbated by fractional reserve where the banks used to be able to lend out what they do not have based on money that is not theirs, where they could lend out 90 percent more of deposits of other people's money by creating it out of nothingness when it did not exist. Since 2020, the private entity the government wrongly delegated its Art 1 Section 8 coining power to made reserve requirements to zero, meaning banks could lend out 100 percent what they do not have in reserves, other people's money to sell by lending it out. This sets up the country for bank runs like in 1907-1908 where people ask the banks for their money, but it does not exist. So the banks crash. The people lose money or are forced to get bank buy ins, meaning they are compelled to violate the teachings in the bible in *Ezekiel* 18:13 (indicating he who sells money as a commodity and makes a profit will lose eternal life in the fires of hell should they not repent, bummer. I believe God is not kidding). The crashes create the pain that will be used to eliminate our current model to the new digital slave techno-system.

courts based on the governments' including the courts' personal partial whims, bias, convenience, pecuniary concerns, based on viewpoint because we petition the courts, or the government including Trump to adhere to the rule of law or based on religious-political or poverty animus. This is so even if the court's staff doesn't want to be bothered with certain petitions to cure the staff's errors based on viewpoint of speech or bias against the petitioner with partiality towards itself. The Ct is required to uphold the 1st Am rt to pet for all without selectively denying certain petitions based on the staff's convenience, workload or whims in violation of Equal Protections component of the 5th or 14th Am. Productivity is NOT the goal. More injustice makes the world worse. The State 3rd Cir and even this USSC has violated my rt to pet through its staff, members, or agents.[28] Phipps' denial of a stay pending an appeal of the

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This nation was created by Const law, not money. This country is united by the rule of law that sustains and maintains these people to respect the dignity of other not destroy or enslave one another through artificial indebtedness under the deception money is freedom, when money is created out of enslaving the people to enrich banks who get free lunches and cake with icing on the idea to rule in secret, and to disparately enrich recipients of grants, contracts or aide in violation of the Equal protections' component.

People mislead others by teaching the American dream is to earn money to buy a house with a fence to care for a family. The bible is clear those who make money their God commit lawlessness, specifically by organized charity or business. *John* 2:16, *Matthew* 6:1-4 They are strangled by their cares to provide for their family, they harden their hearts from loving others. *Matthew* 13

On Jan 1, 2024 the Petro dollar died. Saudi Arabia's contract with the US through Nixon requiring oil to be bought with dollars was annulled. This destabilizes the worth of money since money wrongly is a commodity to buy and sell, same as debt that no one is schemed to pay out when it falls due, stocks.

The BIS indicated 80 trillion dollars of debt, predominantly government pensions were not going to be paid because they were written off on debt swaps for tax breaks. I hoped the courts would catch us should the economy fall.

I have ideas to coin without debt in violation of my religious beliefs to care for as opposed to control the people.

The petition is the people's most powerful Const check upon the government to require the government adhere to and not violate the preempting rule of law based on government agent's partiality to self, its own convenience and other whims in violation of the Equal Protections component of the 5th or 14th Am and Due process. Courts must sustain Const application to the rule of law by protecting the petitioners, the attorneys who help make the people freer by petitions as opposed to sword fights or money like mobsters requiring the government adhere to the rule of law not partial whims and convenience

[28] Court violated my access to the courts by delays in docketing, obstructing access to the courts, disparity rejecting petitions while accepting similar petitions other times, misleading me to miss deadlines, by threats, intimidation, writing on pleadings, staff removing exhibits on the US Supreme Courts records then failing to file applications to Alito to cure the same, deleting some of my allegedly rejected electronic submissions but not all disparately to conceal evidence of possible mistakes, returning papers containing petitions the Court is scheduled to review that must be in their hands in order to not only review without due process violations but to grant the relief requested therein too, 3rd Cir and USSC denying stays, denying time to effectively petition, denying me access to the courts to petition to cure the defect of the staff returning pleadings US Supreme Court was scheduled to review timely by not rejecting or filing the 1/23/24 application and then only referring the Pet for pages to the Court on Feb 16 around 11 PM the date of the conference relation back dated 1/24/2424, while depriving me of a full, fair public proceeding

original disciplinary case and a reciprocal case and this USSC's delay in docketing maliciously deprived me of my 1st Am right to petition the original disciplinary before USSC fairly in accordance with Dye process . US Am 1, 5, 14. I also was deprived of an adequate opportunity to petition for a rehearing of this Court's denial of my petition in Kelly v Trump 3rd Cir., a Reciprocal case, No. 22-6584, and No. 22A478. The 1st Am rt to pet tied with the rt to DP is the most important individual check every citizen has upon the government which maintains the rule of law that unites this country from dissolution. Should the people's check by removed, the country would dissolve. Freedoms would be eliminated by partiality if the gov through the courts only accepted petitions from those it desires to hear by compelling the people to adhere viewpoints the court protects or risk persecution. The Const rts to pet, DP and Equal Protections must not be vitiated by the partial whim of the courts to eliminate checks on the gov rendering

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before my underlying rights including the right to petition were vitiated. The returned paper were incorporated into the petition for pages as exhibits thereto by reference, the petitions for writ of cert it returned, essentially denied me of a liberty interest without opportunity to be heard because the staff made the judgment for the court. Staff denied access by not docketing or returning Petitions twice by the USSC just totally depriving me of property in papers and the liberty interest of the right to petition by outright denials by refusal to reject or accept, this happened 5 or more times by DE Supreme Court in the disciplinary proceeding and this happened before the PA Supreme Court disciplinary case too. I the PA case PA Clerk Josh said the court had the paper copies in their file, but they were not filed or returned, and he said they would not be considered. DE Supreme Court denied fair access to the courts by concealment of evidence of the courts errors by sealing the documents so other courts may not consider material evidence on appeal or in my other cases I incorporate herein in its entirety the DE District Court docket which contains evidence of the same. The gov obstructed my access to fraudulently cover up court errors. The USSC knowingly delayed in filing my interim appeal for a stay and interim application to Justice Jackson to vitiate my 1st and 5th Am rights in this case before USSC and my fair access, and unobstructed opportunity to be heard fairly in other proceedings and forums occurred which deprived me of complete access to this court to appeal the original DE Disciplinary proceeding. Defendant Board intentionally sought to and did deprive me of the 1st and 14th Am. rights to petition right fairly by delays in filing, The Board delayed in answering a timely filed petition for time until 2 days before the proceeding vitiating my ability to timely appeal to the DE Court, who I appealed simultaneously therewith given I had the shingle, per the video on memory stick I had other issues delaying responses until 2 days before the proceeding access not limited to DE Supreme Court sealed motions so as to deprive me of the 1st Am. Rt to petition and opportunity to be heard on them on appeal in 21-5522 and in disciplinary matters which were not unsealed until both cases were complete this court despite my fights as shown on the record below to unseal them. Albeit the unsealing occurred too late after the conclusion of Kelly v Trump and after the disciplinary proceeding. I was denied access to the law library during the disciplinary proceeding, and am currently denied access to the law library as of March 5, 2024 which obstructs my effective means to petition the courts (in violation of 1st Am applicable to State via 14th Am.) Phipp's denial of a stay obstructed my access to the courts. The Third Circuit's reciprocal Discipline Case No 22-8037, the US Supreme Court Kelly v Third Circuit Court of Appeals No. 22-6584 and application No. 22A478. deprived me of all due process applicable to the court via the 5th in contravention of the Equal Protections Clause too since it afforded disbarred and suspended lawyers' opportunity to be heard.

the gov above the law by case law improperly giving them immunity. Const requires the gov adhere to and not violate the preempting Const rule of law for the governments' partial whims, avoidance of costs, martial gain under the common law immunity theory by arguing gov business justifies sacrificing lives and liberties the Const asserts to protect. Immunity Unconst vitiates the people's only individual check upon the government, the rt to pet fairly and DP oppty to heard before the government takes life, liberty, or property vitiating DP and making the people no longer free but controlled slave subjects.

The 1st Am rt to pet combined with the 5th and 14th Am rt to DP is the cornerstone of a government of, by and for the people. The power of the government and the power of the people including the 1st Am rt to pet is based on the rule of law, the Const, which sustains and maintains these United States.[29] The power of the government is NOT based on the will of the people.[30] It

[29] See, Borough of Duryea v. Guarnieri, 564 U.S. 379, 387 (2011) ("This Court's precedents confirm that the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes. '[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government."')

[30] The gov's power is NOT from the people or by their consent Teaching this lie as truth is used to trick the people to believe sacrificing the people's lives and exploiting them selling them for power and material gain of those in gov or its private or foreign partners is good. It is the lie of the devil. It is naughty. There is no social contract. The people's souls are not owned by gov.by their implied consent. Misguided men teach people the lie of a social contract which enslaves people by deceit (to sin and death in hell too) that your souls are contracted without consent or meeting of a mind to eliminate individual liberty by compelled mob rule by representative choice. Unthink that. That is what enlightenment thinkers with whom I disagree sell us beyond their graves. We protect people who disagree with us here. It makes us smarter by helping us learn from one another. Respecting individual exercise of liberties not to conform help us to care for those who inconvenience the majority. It teaches us to love. Courts can teach us to love humanity to prevent sacrificing other people's lives and liberties for the love of money and material gain for the collective whole. Human sacrifice by compelled contribution is not the common good, but the common bad. It appears the Catholic Church first stated we will not be enslaved to work for money to give to countries without our consent. The Third Council of the Lateran met in Rome in March 1179. Pope Alexander III presided and 302 bishops attended where they declared law including *Canon 19* declaring excommunication for those who tried to tax churches and clergy without the consent of the bishop.
On 5 February 1296, Boniface enacted Clericis laicos that forbade clerics, without authority from the Holy See, to pay taxes to temporal rulers, and threatened excommunication on rulers who demanded such payments.
These two examples show the argument of no taxation without consent through representation.
Implied consent to slavery is a lie. It is no consent. The way money will be coined under the new system is schemed to eliminate all freedoms including the freedom to religious exercise by making everything for sale unrestrained by the gov schemed to be eliminated. It is not money that sustains us but the courts by saying what the rule of law is checked by the people's duel check to petition and to be heard fairly. Left unchecked there is no law that restrains the government, the people, or foreign or private partners it is the mark of the beast leading to hell. So the vote

is based on Const law. Petitioning is the only individual liberty that safeguards every other Constitutionally protected individual liberty and claim without compromise or vitiation for the collective representative interest by the vote.[31] The vote is a tool of oppression eliminating individual liberties if not restrained by the courts to serve mob rule as opposed to the impartial application of the Const to the rule of law.[32] The 1st Am rt to petition protects the rt to access to the courts to complain to the gov including the court without fear of punishment. Yet I am punished but for exercising this rt in contravention of the law. That is not okay. I am not below the law's protections and the Court is not above the law. When the court makes a mistake and violates the law, the people's check through the rt to petition coupled with DP affords the Court authority to cure defects or deny the petition. The State violated my rt to petition by outright denials of my rt to petition for accommodations for religious beliefs by complete deprivations[33] and attacked me for asserting my rts.

The state has violated my 1st and 14th Am rt to petition to prevent deprivation of liberties and claims without DP for about 20 years culminating in its attacks against me to collude to intimidate me to cause me to forgo my lawsuit to dissolve the establishment of government

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matters less, the courts matter most and is the only branch where the people are empowered to check all three branches. The people's check must not be removed in violation of the Const.

[31] . See, Borough of Duryea v. Guarnieri, 564 U.S. 379, 387 (2011) ("This Court's precedents confirm that the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes. '[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government."')

[32] I am a Christian I believe in God the father, son and holy spirit as the Word, not the Bible per se as the Word. Nevertheless, I point to the Bible as a historical reference to show the significance of the right to petition. In Acts Chapter 22 about 2,000 years ago, the Apostle Paul was about to get stoned to death by the people until the centurion discovered he was Roman. In Rome, romans were not allowed to be deprived of life or liberty without due process of law. This right to petition the courts, not the vote is what makes America freer, fairer and just, similar to Rome. Conversely, in the Bible Pontius Pilate gave into the mob's vote to crucify an innocent man Jesus Christ despite not finding his conduct worthy of death. See, Luke 23:22-24 Pilate indicating "He has done nothing wrong warranting death…. But they were insistent, demanding with loud voices for Jesus to be crucified. And their clamor prevailed. 24So Pilate sentenced that their demand be met…").

[33] by ignoring them, not filing them, not transferring them for consideration or by Complete denial of mv access to the courts to deprive of the 1st Am right to petition and as a result vitiated my due process rights under US AmV, XI

religion against Trump, and the subsequent disc proceeding brought to punish me for petitioning the Court to safeguard my religious beliefs and to require the courts uphold, obey and do not violate the law. DE Courts not only deprived me of access to the courts in violating my 1st Am rts app to the state via the 14th Am during *Kelly v Trump*, but later, after I filed a civil rts case, the state initiated a disc proceeding, where it also denied me access to the courts, appointed counsel despite my prior objection, treated me unfairly, deprived me of a fair oppty to be heard on my asserted rts to notice, asserted not waived rt to prepare, to call witnesses, to perform discovery, 6th Am rt to self-representation applicable to the Courts via the 14th, and other motions, produced a flawed highly prejudicial record on the transcript which was so flawed and prejudicial that it could not be cured by amendments which I objected to and preserved objections to on the record and on appeal, to notice in conformity with the DE rules, denied asserted opportunity to call witness and other rts. DE, the Board and Disc Counsel violated Rule 9 and Rule h of the disc rules in additional ways by failing to provide documents 10 days in advance of any hearing date to me and preventing me from calling witnesses by allowing me to self-represent with fewer than the 10 days required to not only subpoena witnesses but to provide expected testimony of witnesses to opposing counsel preventing me asserted right to call and cross examine witnesses

It is a long history. I am a Christian. I do not believe the same as others. I asserted petitions to protect my individual exercise of religious belief and other petitions for about 20 years.[34] US Am I, XIV. I have been deprived of asserted rts based on the capricious whims of

[34] Per my Complaint at DI 2 the State through its partners retaliated against me for complaining about flooding in a Widener dorm room destroying my bar material in 2006 where I lost about 2 million dollars in expected income for the state's retaliation against me by delays in admission. Despite the threats by Widener's professor Micah Yarbrough against me for complaining to the State even before taking the DE Bar, I managed to pass the examination on the first try. Yarbough made good on his threat since I did not agree to sign a form absolving him and Widener of harm in exchange for replaced bar study materials. In retaliation against me but for exercising my 1st Am right to petition my admission to the DE Bar was delayed based on Widner and its bar agent's retaliation

against me for the exercise of Const liberties under the 1st Am. The delay was so long my contract at RLF for about $135,000 a year was not renewed, and actually ended after admission. It was horrific. I unwillingly underwent scientific testing, which violates my religious beliefs to gain my license. I am anti-science, anti-deference and anti-worship of man and man's creation products, services, technology, science, and even money as master and God in place of God, by judicial deference rendering man and man's creation above court correction when they kill, steal or destroy human life, health or liberty for material gain. See, *Romans* 1:25. I incorporate herein by reference the Motion to plead in forma pauperis and all the documents attached thereto, referred therein and the entire records in the district and appellate below, including the videos and electronic exhibits I incorporate herein fully. I outline my religious beliefs more fully in a petition relating to food benefits.

Upon my admission to the bar I was compelled to violate my religious beliefs in exchange for a license. I requested a religious exemption from swearing in the bar which was denied by the court. *Matthew* 5:34 I petitioned DE Supreme court to safeguard my protected 1st Am religious beliefs which were denied or ignored compelling me to violate my religious belief unwillingly or face substantial burdens with regards to other issues not limited to a petition to be removed from the roster of family law appointments based on religious beliefs. Another appointment was made despite my request. I also petitioned the state for an exemption from filing fees, signature or fundraising requirements in order to run for the US House of Representatives without compelled violation of my religious beliefs per the complaint attached to the Motion to file IFP, Kelly v Democrats and Department of Elections et al, attached hereto. I believe people are misled into exploiting the needy to serve the greedy by fundraising, volunteering, organized charity and pro bono per Jesus Christ. Jesus teaches not to do not give charity or volunteer seen. Do not give to get under the guise of charity. It is business. Teaching business is charity or love drives out love from the hearts of man for one another and God replaced with the love of money or other material gain leading to hell. Matt 5:1-4 Jesus teaches you cannot serve God and money. Matt 6:24 I stand by God and the First Am protects my asserted religious beliefs no matter how much the state disdains my religious belief in Jesus, not money as God. I petitioned the courts regarding disparate treatment by Delaware judges based on place of origin and firm size animus in 2012 by stating

> "Dear Justice Ridgely:
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> Thank you for participating in the CLE. I enjoyed it immensely. However, I had some concerns.
>
> I was concerned by the appearance of some of the speakers' partiality towards Delaware attorneys. Every attorney that comes before a Delaware Court should be treated the same regardless of where they are from. The Court should not take a Delaware attorneys word over an out of state attorneys word solely on the illogical basis that the Delaware attorney is from Delaware.
>
> I was also concerned about the comment that a judge let an out of state attorney practice pro hac vice because they were from a "respectable firm." I think all attorneys should be held by the same standard regardless of the size or reputation of the firm. They should be looked at as individual attorneys who will potentially have influence within the courts in this state.
>
> On the other hand, I was very impressed by your graceful demeanor. You did not show partiality, nor did you support the above referenced remarks. Instead you sat back silently like a wisdom filled father observing all behavior. Thank you for being a good model for judges and attorneys.
>
> Unfortunately, I have seen partiality towards Delaware attorneys in my practice. In fact during my first appearance in this state a judge [Judge Smalls of the Court of Common Pleas] accused me of being a "Philadelphia lawyer," as if this was a bad word.
>
> I also worked with Delaware lawyers who grew up in other states, and I was surprised that some lawyers treated me differently because I grew up here. They would treat me with respect, lend me forms offer to meet me for lunch etc...Conversely, I recall how some Delaware attorneys mistreated my former non-native colleague by condescendingly describing "how things are done in Delaware" and "the Delaware way." I recall with disappointment that some Delaware lawyers even used bad language to discuss the Delaware way. I think such language and partiality makes Delaware attorneys look bad. Although it's nice to be given preferential treatment because of where I grew up it does not make it right.
>
> On a personal note, one of the reasons why I became a lawyer was my faith, Christianity. Under my faith, Jesus Christ was executed for no lawful purpose. Instead he died as a result of the passion of the people instead of logic and reason under the law. That is wrong. The judicial system should remain impartial, and individuals should not face such irrational persecution. Nonetheless, this is not the case in our world. That is why I went to law school. And that is why I think it's important to bring my concerns relating to partiality before this Honorable Court to you.

the state. The culmination of deprivations of rts were so egregious during the RFRA lawsuit I filed against former President Trump to dissolve the establishment of government religion ("*Kelly v Trump*") that I filed this civil rts lawsuit below prior to the conclusion of Kelly v Trump on appeal to the USSC at No 21-5522.[35]

After the initiation of this law suit ("Kelly v Swartz"), the State retaliated against me by bringing a disc proceeding against me placing my license to practice law on disability inactive based on my religious beliefs in Jesus and citations to the Bible in Kelly v Trump, per DEs' letter

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

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

Despite my petition regarding judicial place of origin animus, another Judge selectively targeted me to disparage me based on place of origin in retaliation for my petition. Thereafter, another Judge told me to go back to PA after a CLE class because I stole his thunder and answered a question correctly. I believe it was Judge Slights albeit I see Judge Wallace also has a bald head and may have been the culprit. I am scared. People have been weird, stocking up on guns and exhibiting place of origin, religious, political and other animus in DE and across the nation. People have threatened me, thrown things on my car, and talked about shooting me in DE. The police did not make a report about the threat of shooting because the police man I complained to was outside of his jurisdiction at the gym. I did show him my car with substance thrown all over it. As you can see per the memory stick I was on TV seeking to petition for help and was again retaliated against for another matter. I ran for office back in 2018 because nonlawyers were lawyering in DE. I learned there was a plan to eliminate people judges not merely lawyers. See Exhibits on Agenda to eliminate the law. I sought to petition this court to save not only my life, liberties but this court itself, and the rule of law which sustains these United States, but my petitions were not filed. I was denied access to the courts in violation of my 1st Am right to petition unfairly which vitiated my underlying liberties, harmed my health and vitiated property interests without due process, unfairly. That is not okay. I discovered the US Supreme Court also denied access to the courts to other claimants, including Shao based on viewpoint of speech contained in petitions regarding grievances against this court or courts in general. The right to petition is the only individual liberty which protects all other rights from infringement. When claimants are deprived of that right injustice occurs and the rule of law is degraded. The rule of law is what maintains and sustains these United States. The rule of law is degraded by the courts' partiality towards itself or the government to the extent it sacrifices the lives and liberties of the people, including the First Am right to petition, Due Process and Equal Protections. When the courts get it wrong the right to petition may be used again to correct to preserve not destroy the courts. Injustice is guaranteed when petitions are denied by the whims of the court even the US Supreme Court. The only branch that safeguards freedom is the judiciary. I seek to protect those I correct, not to destroy the courts or staff which would destroy the people's check by the right to petition against the government only branch that safeguards liberty.

[35] I incorporate the entire record below in the District, Appellate Courts, Kelly v Trump, the petition to file in forma Pauperis ("IFP") the attachments thereto. I especially incorporate the Petitions to appeal this case and the Third Circuit Case 22-3372 of an Eastern District of PA Appeal fully ("rejected petitions"). Since my petition for additional pages were rejected in both matters and the rejected petitions were sent back I assert all claims incorporated therein without willingly waiving Const rights by government incited substantial burdens to deprive me of my asserted right to petition and opportunity to be heard before government deprivations of life, liberty or property. US Am I, V, XIV. I include all the documents contained in the exhibit and the memory sticks with digital data, PDFs and videos.

dated August 23, 2021 and the petition drafted against me at paragraph 7, despite the fact my religious beliefs were in issue. I asserted new claims and evidence on the record arising from start to finish in the disc proceeding prior to District Court's 4/26/24 appealable order, and appealed the preserved issues and claims relating to the disc proceeding with the 3rd Cir. I seek redressability for DEs, State Courts, its agents and arms unconst acts to impede my access to the courts as an aggrieved party based on viewpoint in speech, religious political animus with malice aforethought to chill and violate my exercise of fundamental rts including 1st Am rts app to the state via the 14th Am to 1) association as a Catholic, Christian, Democrat, lawyer with private individual liberties. 2) religious belief, 3) exercise of religious belief, 4) speech outlining my beliefs in petitions, 5) petition and access to the courts including the rt to petition to safeguard my Const protected rts and other claims without vitiation based on viewpoint or procedural DP violations,[36] 6) 14th and 5th Am procedural DP, including but not limited to a notice, fair meaningful oppty to be heard, and meaningful oppty to present a case, call witnesses, perform discovery, 7) 14th and 5th Am equal protections without insidious disparate treatment against me as a party of one and favoritism towards the government. US Am I, XIV, 8) 6th and 1st Am Rts to self-represent in quasi criminal matters based on my religious belief in Jesus teachings not to allow anyone to be your advocate except the holy spirit when I am brought to the court based on

[36] In *Marbury v. Madison*, 5 U.S. 137, 147 (1803) this Court held, " It is a settled and invariable principle, that every right, when withheld, must have a remedy, and every injury its proper redress. 3 Bl. Com. 109. " I am prejudiced by the denial of access to the courts. Structural error includes deterrence of right to appeal. See, *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 387 (2011) ("This Court's precedents confirm that the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes. '[T]he right of access to courts for redress of wrongs is an aspect of the First Am right to petition the government."'); Stokes v. Delo, 495 U.S. 320, 323 (1990) ("Delay or default by courts in the federal system must not be allowed to deprive parties, including States, of the lawful process to which they are entitled. ")

my religious belief in Jesus,[37] 9) 6th Am rt to access to the record in my own case No. 541[38] along with other claims not limited to infliction of emotional distress, economic harm, defamation, property interests in my licenses to practice law, nominal damages,[39] damages, equitable relief, Const challenges to certain attorney disc rules[40], Attorney-Judicial Disc proceedings, resolution in the splits in the jurisdiction as to what Const rts attorneys have, witness tampering, collusion to obstruct my access to the courts and witness intimidation. 42 USC §§§ 1983, 1985, 1988.

The District Court's decision must be set aside as clearly erroneous as a matter of law and as a matter of fact, creating manifest injustice against me. The District Court abused its discussion as to deny me the oppty to be heard on Const claims in the only forum with

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[37] *Faretta v. California*, 422 U.S. 806, 95 S. Ct. 2525, 45 L. Ed. 2d 562 (1975) ("Sixth Amend does not provide merely that defense shall be made for accused but grants to accused personally the right to make a defense; right to self-representation to make one's own defense personally is necessarily implied by structure of the amendment."); United States v. Engel, 968 F.3d 1046, 1052 (9th Cir. 2020) ("A violation of a defendant's Sixth Amendment right to self-representation is structural error. ("The Supreme Court has found denial of the right of self-representation to be structural error because it deprives a defendant a fair chance to present his case in his own way." (internal quotation marks omitted)). ")" McKaskle v. Wiggins, 465 U.S. 168, 178 n.8 (1984) ("Since the right of self-representation is a right that when exercised usually increases the likelihood of a trial outcome unfavorable to the defendant, its denial is not amenable to "harmless error" analysis. The right is either respected or denied; its deprivation cannot be harmless. ")

[38] (*N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016), "We have previously recognized a right of access to judicial proceedings and judicial records, and this right of access is beyond dispute." *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 780-81 (3d Cir. 1994) (internal quotation marks omitted); see also *Nixon v. Warner Commc'ns, Inc*., 435 U.S. 589, 98 S.Ct. 1306, 55 L.Ed.2d 570 (1978) (recognizing that, in the context of criminal proceedings, the press has a historically-based, common law right of access to judicial records and documents). That right is rooted in common law and predates the Const. *Bank of Am. Nat'l Tr. & Sav. Ass'n v. Hotel Rittenhouse Assocs*., 800 F.2d 339, 343 (3d Cir. 1986).

[39] "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.

[40] DI 58, showing my new discovery DE Supreme Court fired two staff to prevent me calling them as witnesses in my favor, and assert my intent to file a motion to amend once as a matter of right to include all the new and additional information, new claims, and specifically Const challenges against rules 13 and 14 and proceeding. See, Centifanti v. Nix, 865 F.2d 1422 (3d Cir. 1989) ("Suspended attorney who had been denied reinstatement to bar brought civil rights action against Chief Justice and Justices of Pennsylvania Supreme Court alleging various **constitutional defects in procedural rules** under which Supreme Court considers petitions for reinstatement of suspended attorneys…..The Court of Appeals, Cowen, Circuit Judge, held that: (1) federal district court had subject-matter jurisdiction; (2) district court abused its discretion in denying attorney's motion for leave to amend complaint; (3) district court properly denied attorney's motion to compel discovery of privileged documents; and (4) attorney's complaint was not barred by state statute of limitations for tort actions or by principles of res judicata.")

jurisdiction so as to render me without relief anywhere. In *Deakins v. Monaghan*, the Sup Ct held only that "the District Court has no discretion to dismiss [it could not dismiss] rather than to stay claims for monetary relief that cannot be redressed in the state proceeding."

I made it clear to the Court, I pled collusion, witness tampering, defamation, Constitutional injury and emotional distress, by pleading damages, albeit unartfully in my original Complaint. (DI 2, 34-35). In addition, I showed my intent to seek nominal damages, damages, and equitable relief too. (D.I. 43, 58, 69-75, 77-79). I also requested other equitable relief, and nominal damages. I also sought to amend the name of a Defendant, place the DE Supreme Court as a party, and other matters I include herein by reference to the docket item numbers. (DI 43-44, 55-56, 58, 69-75, 81-82, 85). The state court does not have subject matter jurisdiction or jurisdiction is voidable over my non-disc claims where members of the DE Supreme Court are parties for conduct done in their private capacity unrelated to their capacity as judges by outside attacks against me to cause me to forgo my law suit before it, firing staff, removing evidence in my favor so as to obstruct my access to other courts, including appeal of Kelly v Trump in violation of DP. The Younger abstention is not appropriate to enjoin a forum without subject matter jurisdiction. The Delaware Supreme Court is without jurisdiction for its violations of procedural and substantive DP. Its judgments must be deemed void. (See, May v. Anderson, 345 U.S. 528, 537 (1953) "It is void … if it denies DP of law."); (Pease v. Rathbun-Jones Eng. Co., 243 U.S. 273, 276 (1917) Judgments "are void for lack of DP of law, or should be set aside for error."). The state-court does not have subject matter jurisdiction or jurisdiction is voidable. The Younger abstention is not appropriate to enjoin a forum without subject matter jurisdiction. The Delaware Supreme Court is without jurisdiction to rule on its own alleged violations of procedural and substantive DP, violations of First Am rts, conspiracy and collusion

under 1985, or whether it had subject matter jurisdiction based on its own private conduct which shocks the conscience including collusion to continue to obstruct my access of the courts as recent as 3/5/24 to effectively petition by denying me access to the law library. Its judgments in Kelly v Trump and in the disc cases may only be deemed void by the Federal District Court, not the state court since the judges acted outside the judicial capacity to collude and obstruct my access to the courts fired material witnesses and concealed evidence in my favor to cover up its misconduct which is outside the scope of their professional capacity.[41] See, e.g., *Forrester v. White*, 484 U.S. 219, 229 (1988) (Some examples of nonjudicial acts include administrative tasks, such as hiring and firing of employees, which are not subject to the protections of absolute immunity.) This activity caused to hide evidence by denying my motion to call one of the witnesses to conceal this additional private conduct done with the private unconstitutional intent to deprive me of the 1st Am rt to fairly meaningful present my case in violation of DP app to state via the 14th Am is done in its private capacity. I had no adequate opportunity to raise my federal claims in state court. I asserted Constitutional defenses. Nevertheless, the state court precluded my meaningful opportunity to be heard on my defenses and motions in the Disc proceeding, prevented discovery, denied me the opportunity to call witnesses, denied me access to the law library, sealed pleadings to conceal evidence, and fired two witnesses to prevent their testimony in my favor to prejudice the proceeding against me. (DI 55, 70-75, 77). There was no opportunity to ask the Delaware Supreme Court to void its own decision in Kelly v Trump and

[41] Liteky v. United States, 510 U.S. 540, 114 S. Ct. 1147, (1994)("Extrajudicial source is not the only basis for establishing disqualifying bias or prejudice; it is the only common basis, but it is not the exclusive one, since it is not the exclusive reason a predisposition can be wrongful or inappropriate. 28 U.S.C.A. §§ 144, 455"); Bush v. Rauch, 38 F.3d 842, 847 (6th Cir. 1994)(I argue the state's decisions are void, without jurisdiction exercised, outside of the scope of judicial function, in clear absence of all jurisdiction since the Delaware Supreme Court incited the state arms to attack me to fix the outcome in both Kelly v Trump, and the disciplinary matter. De Sup Ct committing outside acts in conspiracy to intimidate a witness me, to cause me to forgo my case before it and actively consealed evidence in my favor to fix the outcome before it and other matters by sealing my pleadings and preventing my asserted right to discovery and to call witnesses to cover up firing the material witness.)

the disc matter or to seek equitable relief, money damages or nominal damages against itself and its agents and arms. My claims for damages were unavailable in state board whose jurisdiction does not permit claims that are not discipline including equitable relief regarding Constitutional challenges and splits to certain rules, disc proceedings and other claims I must be granted to plead by amending my complaint below before this USSC makes a judgment on the facts in violation of DP app to the USSC via the 5th Am. The District Court refrained from examining the substance of my complaint and motion(s) to amend the complaints. The issue is whether the District Court has jurisdiction to hear my case.[42] Younger does not apply. The Orders below must be vacated and this case must be remanded back to the District-Court to review the substance of my complaint, amended complaint(s), and motions.[43] I do not have room to argue everything I pet to be heard on because this Ct's denial of pages compels me unwillingly to exclude all grievance in contravention of my 1st Am rt to pet. So to alleviate harm I in good faith abbreviate and restate what I argued in my rejected pet herein as follows:

> "The Court abused its discretion by dismissing my appeal in part as moot, since the issue of enjoining an unlawful **proceeding is capable of repetition yet evading review**.
>
> The Court committed clear error of law, of fact, creating manifest injustice, by dismissing under the initial complaint under Younger.
>
> Younger does not require abstention to my case. There is no state case to abstain from. The state case has concluded. There is no bar. Even if there was a case: 1. Younger does not apply to my claims for damages. The Court erred by dismissing instead of staying the case 2. Younger does not apply to federal const claims in the or ancillary claims I had no oppty to assert on the state forum. For example, 42 U.S.C.A. §§§ 1983, 1985, 1988. Younger does not apply to my claims for violations of my rt to petition for bar dues, the rt to petition in Kelly v Trump, Equal protections claims for damages, nominal damages const arguments against the disc rules, proceeding and 3. Bad faith, harassment, or extraordinary circumstances have arisen in my case that make abstention inappropriate, 4.The Court erred in denying my motion to amend the complaint to include

[42] Citing, Deakins v. Monaghan, 484 U.S. 193, 108 S. Ct. 523, 98 L. Ed. 2d 529 (1988)

[43] With regards to 3rd Cir footnote, I assert my 1st Am rt to Pet and 5th Am oppty to be heard. I must be afforded a fair meaningful opportunity to Petition under the 1st Am and 5th Am procedural Due Process before a decision may be made on Rooker Feldman as not ripe for review. I should not be denied the fundamental right to pet and oppty to be heard fairly before my rights are foreclosed upon capriciously by the Gov.

procedural and substantive DP violations, equal protections violations, and other conduct and claims that required I add the DE Sup Ct and the members to my complaint on January 24, 2022. (DI 43) I should be granted leave to amend the complaint, to include additional arguments to prevent manifest injustice that shocks the conscience in terms of loss of procedural DP violations that make the findings in Kelly v Trump and the Disc void or voidable, loss of fundamental rts, and government punishment for the exercise of my rts, including the rt to petition. 5. The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the oppty to be heard to safeguard my exercise of First, 6th, 5th, 13th and 14th Am rts, creating loss of First Am rts and my interest in my ability to work in my profession.

The District Court and the Third Circuit Panel (collectively and individually also referred herein as "Court") abused its discretion by affirming the District Court's judgments at District Court Docket Item Number (Hereinafter "DI") DI-16-17, DI-30-31, DI-59-60.

I showed availability of new evidence, clear error of law, clear error of fact, evidence of Defendants harassment and bad faith causing manifest injustice requiring the orders below be vacated and the case be remanded to the District Court. Moreover, even without the new evidence contained in the motions of reconsideration and other motions the Court errs in affirming the judgments below dismissing based on Younger. DI-2-16.

Appellate Court errs as a matter of law in finding no legal bar in presenting my claims before the state forum. The Disc proceeding forbids asserting my claims for damages, nominal relief and equitable relief against the Defendants and State court under the state disc proceeding. The proceeding is limited in subject matter jurisdiction under Del. Disc. Rule 1(a), 5, 8, 10.

> Del. Disc. Rule 5 limits jurisdiction to disciplining attorneys to
> "Rule 5. Jurisdiction.
> (a) Lawyers admitted to practice. Any lawyer admitted to practice law in this jurisdiction, including any formerly admitted lawyer with respect to acts committed prior to suspension, disbarment, transfer to inactive status or retirement, or with respect to later acts which amount to the practice of law or constitute a violation of these Disc R, or any rules or code the Ct adopts later; any lawyer specially admitted by a court of this jurisdiction for a particular proceeding; and any lawyer not admitted in this jurisdiction who practices law or renders or offers to render any legal services in this jurisdiction, is subject to this Court and the Board's disc jurisdiction."

The claims for damages, nominal damages and equitable relief are prohibited and not within the scope of the Board's jurisdiction, including the claims for damages in my initial complaint. See, *In re a Member of the Bar of the Supreme Court, of the State Enna*, 971 A.2d 110, 125 (Del. 2009), regarding limited jurisdiction. Moreover, even if the State Court entertained my claims, my procedural DP rts are violated by a partial, unfair, biased forum. US Amend I, XIV. The Federal Forum is the only forum which has jurisdiction over my claims. The State Sup Ct had no jurisdiction to resolve claims for damages, nominal relief and equitable relief against the state and itself in a disc proceeding. This creates a bar. The lack of personal jurisdiction over the DE Sup Ct

members which violates the 14th Am also places a bar to my claims in the state proceeding. Allowing the State Court to rule in its own favor in a partial forum offends the notions of fairness and jurisdiction apparently may be upheld under the Fourteenth Am DP Clause app to the Defendants and the state Court. The DE Sup Ct does not have personal jurisdiction over its own alleged Const and federal violations wherein it is the judge and party. *Ins. Corp. of Ir. v. Compagnie Des Bauxites De Guinee*, 456 U.S. 694 702-03 (1982) ("The requirement that a court have personal jurisdiction flows not from Art. III, but from the DP Clause. US Amend XIV. The personal jurisdiction requirement recognizes and protects an individual liberty interest. It represents a restriction on judicial power not as a matter of sovereignty, but as a matter of individual liberty. Thus, the test for personal jurisdiction requires that "the maintenance of the suit . . . not offend 'traditional notions of fair play and substantial justice.'" *International Shoe Co. v. Washington*, 326 U.S. 310, 316 (1945).

The Court abused its discretion by denying the additional deprivation of Const liberties that arose since the filing of the petition that I placed on the record and appealed, including the disc proceeding that would result I manifest injustice against me in term of loss of my 1st Am fundamental rts and other claims should the case be affirmed.

The fixed, unfair partial disc proceeding brought in conspiracy by the DE Sup Ct, Chancery Court agents, ODC and Board, (collectively, and individually "State") to conceal Court agents' unconstitutional interference with the "DP" adjudication of Kelly v Trump, and thereby in interference with my personal-religious-political-speech; personal-religious-beliefs; personal-religious-political-exercise; and personal-religious-political-petitions has punished me and violated by const protections by selective disparate treatment against me, for the exercise of fundamental rts, as a party of one, as an indigent individual with religious-political beliefs in God as savior and the state as civil authority curbed by the first Am from "establishing religion."

The findings by the State must be rejected as a matter of law as an abuse of discretion, clearly erroneous findings of fact, an errant conclusion of law, and an improper application of law to facts.

The hearings and actions taken against my professional license in retaliation for my exercise of Const rts are in violation of the First Am, the Procedural and Substantive DP Clause and Equal Protection Clauses of the Fourteenth Am. They must be rejected as by "rule of law" rather than personal vendetta for my personal-religious-political speech contained in the petitions. (US Amend I, XIV)

The State denied me of substantive and procedural DP rts in this disc proceeding. The record shows clear and convincing evidence that the proceedings were brought, with religious-political animus, in retaliation against me for filing Kelly v Trump, for petitioning the court regarding bar dues to safeguard my liberties and for petitioning the Court regarding the state's and its members violations of my Const rts.

The state abused its discretion by 1. Vindicative prosecution, which constitutes a violation of DP, and by Selective prosecution, which constitutes a denial of equal protection.

I have a rt to petition the courts when I believe a transgression has been committed against me by the establishment of government religion by President Trump and for retaliation for the exercise of my fundamental First Am rt to petition to safeguard

my exercise of the First Am rt to religious belief, contained in my private 1st Am exercise of protected private speech contained in my petitions in Kelly v Trump and for bar dues..

I uphold my oath by requesting government agents, judges, presidents and members of congress to adhere to rule of law by allowing me to exercise my Const rts. The steps taken to orchestrate this proceeding circumvent DP protections and, thereby, manifest selective; targeted; unjust persecution.

The Third Circuit erred as a matter of law in denying my asserted claims that arose since the filing of the petition that I placed on the record, which would cause manifest injustice against me should they not be heard since the statute of limitations approaches and poverty creates a substantial burden so great as to deprive me of access to the only court which may grant me relief especially since the statute of limitations has expired for some claims and approaches expiration for other claims and my poverty creates a substantial burden to access to the courts should I be compelled to start all over. For example, the petitions relating to bar dues have expired.

The Court overlooked the additional facts I alleged below showing violations of my 1st Am religious beliefs, 6th Am rt to self-represent, 14th Amend. procedural DP violations, violations of Equal Protections, and specific facts showing lack of adequate notice, denial of asserted rts, denial of fair meaningful oppty to be heard, to call witnesses, to cross examine my suspected accusers, to prevent evidence in my favor, additional conduct causing emotional distress manifesting in the shingles, the state's elimination of evidence in my favor and other voluminous evidence on the record below, including in my motions for a reconsideration. DI-14, DI-20 through DI-24, DI 29, DI-34 through DI-37, DI-39 through DI-44, DI-47 through DI58, and additional docket items after the Order at DI-60. This new and additional evidence contained in DI-14 through DI-58 must not be ignored. It is part of the record on appeal. The Court also erred by ignoring my challenges to state rules. See DI 58, for one example. I met the standard for reconsideration.

The claims I asserted in my Motions of reagument and the orders denying them must in the interest of justice be considered by the Court as not waived but asserted on the record in the trial and appellate court. For example in the First Motion for reagument and the amendments thereto, I discussed the State's violations relating to appointment of counsel on 12/13/22. I immediately informed the state court I declined representation. I faced foreseeable emotional distress at violating my beliefs in Jesus by such appointment over my objection. Jesus teaches us to let the holy spirit to be our advocate when we are brought to the courts for our religious beliefs. The fact I fought hard to fire the counsel who was removed less than two weeks before the improperly scheduled hearing date, does not remove the Defendants' and the DE Sup Ct's violation of my First Am rt to religious belief and exercise of belief and Sixth Am rt to self-representation, to oppty to call witness and other rts app to the state pursuant to the 1st, 6th and 14th Amend.

The US Sup Ct in *Faretta v. California*, 422 U.S. 806, 95 S. Ct. 2525, 45 L. Ed. 2d 562 (1975) held,"Sixth Am does not provide merely that defense shall be made for accused but grants to accused personally the rt to make a defense; rt to self-representation to make one's own defense personally is necessarily implied by structure of the am." U.S.C.A.Const. Amend."

In my other motions the Court denied I outlined other Const defects in the DE Disc proceeding that in the interest of justice must be considered by this Court in the court's denial of my motion to amend the complaint once as a matter of rt.

The DE Disc procedure was so lacking in notice or oppty to be heard before the DE original disc proceeding as to constitute a deprivation of DP in the DE forum. There was such an infirmity of proof as to give rise to the clear conviction that this court could not, consistent with its duty, accept as final the conclusion by the state court.

The Court refused to give me pleadings in a case against me to conceal the fact it denied me the oppty to be heard in objecting to the appointment of counsel, Number 541. I am entitled to records used against me as a party in a proceeding. I am entitled to see if my pleadings were on the record or if I was denied an oppty to be heard in contravention to 1st and 14th DP with disparate treatment based on religious-political belief and poverty. *US Amend I, XIV. See, N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016).

The lawyer Disc proceedings before the Defendants and DE Sup Ct deprived me of a meaningful oppty to be heard, the oppty to prepare, call witness, receive adequate notice, the rt to self-represent, to present evidence without the State forum's collusion to conceal evidence and other vitiations of my asserted, not waived Constitutional protections and rts in the DE Disc Proceeding. *Greene v. McElroy,* 360 U.S. 474, 475 (1959) ("this Court will not hold that a person may be deprived of the rt to follow his chosen profession without full hearings where accusers may be confronted and cross-examined").

The US Sup Ct further held, "It is accused, not counsel, who must be informed of nature and cause of accusation, who must be confronted with witnesses against him, and who must be accorded compulsory process for obtaining witnesses in his favor. U.S. Const. Amend. 6." *Faretta v. California*, 422 U.S. 806, 95 S. Ct. 2525, 45 L. Ed. 2d 562 (1975). I was denied the rt of notice, oppty to confront and rt other rts. The Court erred in ignoring these denials contained in my motions for reargument and other motions below.

The State denied me of the meaningful oppty to litigate the question of subject-matter jurisdiction in the sham proceeding against me, and thus I may reopen that question in a collateral attack based on adverse judgment. This Court has not allowed me the oppty to present the facts to show this. I must be afforded notice and the oppty to be heard under the 5Th Am app to the federal courts to prevent unconstitutional vitiation of rts by this Court. US Amend I, V.

I incorporate herein by reference in its entirety along with the pleadings referred therein 3DI-98, the memory stick referred to at DI-58, and the District Court items DI-62 to DI-148 since this Court appeared to consider the additional Orders at DI-106, DI-111. The Court errs as a matter of law and as a matter of fact creating manifest injustice against me by ignoring the legal arguments, claims and additional facts on the record below. Id.

The Court errs as a matter of law for not considering my motion to withdraw my motion to amend the complaint at DI 43, my additional motions to amend the complaint once as a matter of rt to include all the additional claims, facts, foreseeable harm and additional information discovered and arising in the course of this litigation, including but not limited to items in DI-43, DI-58, DI 69-75, DI-77, DI-81, DI-85-87. DI 95.

The Court abused its discretion in denying me the rt to amend the complaint as a matter of rt, despite the lower Court not ruling on my motion to amend which I withdrew and reserved the rt to amend as a matter of rt prior to the Order at DI 60, (DI 58) and more specifically after the order when the case is remanded DI 43, DI 58, DI 69 through 81.

My claims relate not only to my petitions in Kelly v Trump but also First Am violations of my rt to petition app to the state pursuant to the 14th Am regarding petitions for bar dues. DI 2-4, 3DI 74. Should this case be dismissed the statute of limitations would foreclose me an oppty to assert my claims anywhere in the only forum which may offer relief, the District Court. This Court was apprised of the DE Sup Ct's collusion in Kelly v Trump and the DE Disc proceeding, and my claims for damages, nominal relief and equitable relief other than enjoining the disc proceeding. DI 43, DI 58, 3DI-6 page 3 through 11, 3DI-26 through 3DI-29, 3DI-31-32, 3DI 36 through 3DI 46, 3DI 51 through 3DI 62, 3DI-68, 3DI-69, 3DI-71-3DI-76, 3DI-83-84, 3DI-93, 3DI-95 through 3DI-99, 3DI-103-107, 3DI-119-3DI-198; See, Reed v. Goertz, No. 21-442, at *5 (Apr. 19, 2023)("*Ex parte Young* doctrine allows suits like Reed's for declaratory or injunctive relief against state officers in their official capacities.") Id at 6-7 and 24 (*Rocker-Feldman* and 28 USC 1257 do not prohibit violations of procedural DP claims); *See, Centifanti v. Nix*, 865 F.2d 1422, 1430 (3d Cir. 1989).

Further whether Rooker-Feldman applies to claims I have not yet made is not ripe on appeal. The District Court did not review the merits of my claims. This appeal is limited to the improvident dismissal under Younger, and denial of my asserted rt to amend the complaint once as a matter of rt. The claims if accepted as pled show independent federal claims I must be allowed to argue before preemptive denial, including but not limited to void or voidable subject matter jurisdiction of the DE forum. US Amend I, V, XIV.

I also seek to amend the complaint to include a number of new claims too numerous to outline that I must be afforded the oppty to be heard on before being preemptively denied in violation of the US Amend V oppty to be heard, including but not limited to assertions that DE Disc rules are unconstitutional per se and some as applied which are not prohibited by the Rocker-Feldman doctrine. *See, Parkview Assoc. Partnership v. City of Lebanon*, 225 F.3d 321, 327-28 (3d Cir. 2000) (Const challenges to rules are not barred bar Rooker-Feldman); DI 77-79, DI 58; *See, Skinner v. Switzer*, 562 U.S. 521, 532 (2011)("If a federal plaintiff 'present[s][an] independent claim,'" it is not an impediment to the exercise of federal jurisdiction that the 'same or a related question' was earlier aired between the parties in state court." (internal citations omitted)); Id at 33 n 10("The Court further observed in *Exxon Mobil Corp. v. Saudi Basic Industries Corp*., 544 U.S. 280, 292–293, 125 S.Ct. 1517, 161 L.Ed.2d 454 (2005), that '[w]hen there is parallel state and federal litigation," state preclusion law may become decisive, but "[p]reclusion ... is not a jurisdictional matter.'").

The Third Circuit and District Court (hereinafter "Courts") overlooked the fact I invoked my rt to amend the complaint once as a matter of rt under FRCP 15. Though the Court argues my plea to enjoin the case against me as moot. This is capable of repetition and evading review, and has created manifest injustice against me as well as other lawyers and professionals who have legitimate claims for which they should not be punished for making in violation of the First Am rt to petition, merely because the claims

are against the government or government agents. This disparately favors government agents in violation of the Equal protections Clause in their private and official capacity, making it impossible to correct misconduct by just decrees.

I must be granted leave to amend the complaint as a matter of rt under FRCP15 (a), to correct any defects or arguments relating to a Younger dismissal to prevent manifest injustice that shocks the conscience in terms of loss of fundamental rts, and government punishment for the exercise of my rts, including the rt to pet. See, *Mayle v. Felix*, 545 U.S. 644, 663 (2005). The Supreme Court in *Foman v. Davis*, 371 U.S. 178, 182 (1962) held the "outright refusal to grant the leave [to amend the complaint] without any justifying reason appearing for the denial is not an exercise of discretion; it is merely abuse of that discretion and inconsistent with the spirit of the Federal Rules." This Court abuses its discretion by denying my asserted rt to amend the complaint. 3DI 98.

The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the oppty to be heard to safeguard my exercise of First Am rts, creating loss of First Am rts and my interest in my ability to work in my profession

The Appellate Court abused its discretion by ignoring the evidence averred showing bad faith and harassment including but not limited to Court staff prevented service of my pleadings by writing on the praecipe, instructing me to cross off local counsel's address and for misleading me in hopes I miss a deadline to appeal an order I had not yet received. The DE Supreme Court sent Court of Common Pleas Judge Kenneth S. Clark to attack me to compel me to forgo my Kelly v Trump, the court fired witnesses, sealed documents in my favor without providing me notice and an oppty to be heard to conceal evidence in my favor in both Kelly v Trump, and the Disc proceeding sending additional DE Sup Court arms and agents to cause me to forgo Kelly v Trump, Defendant Swartz lied in an attempt to fix the proceeding and cost me additional money time and resources. Defendants violated not only my Const first Am rts to pet, religious belief, speech, association and exercise of belief, the court denied me fair notice by violating its own disc rules, denied me the rt to self-represent, a fair oppty to be heard, the rt to call witnesses. DI 2, 3DI 98, Exhibit A-D

I sought claims for emotional distress, violations of procedural DP, Equal Protections claims, First Am violations of **private rt to petition**, religious belief, exercise of belief, speech and association, loss of employment opportunities, or other economic harm, and harm to my reputation during Kelly v Trump. (DI 2)

New claims arose during the law suit which I later amended the Complaint to include additional facts showing the DE Supreme Court instigated the disc proceeding against me, colluded with Defendants to prejudice my case, concealed evidence and witnesses, while denying by ignoring my motions to perform discovery. I also included additional claims procedural DP violations, denial to access to the law library and other disparate treatment by the DE Courts made in bad faith, which occurred during the DE Disc proceeding as distinguished from Kelly v Trump. I sought nominal damages, damages and additional equitable relief, including but not limited to voiding the DE Disc proceeding and Kelly v Trump due to procedural DP violations which shock the conscience. I moved to add the DE Supreme Court as a party. (DI 43, 58-60, 69-75, 77, 80-82, 85)

I also sought claims for Defendants' selective prosecution in bringing a disc action against me to demean my reputation by placing me on inactive disabled to conceal Defendants misconduct in collusion with the DE Supreme Court, and to punish me for exercising the rt to access the courts and First Am rts, based on Defendants disdain for my religious-political beliefs contained in the speech in the Religious Freedom Restoration Act petitions and other petitions. Id.

I respectfully request this Court vacate the District-Order, and remand the case back to the DE District Court for review, granting leave to amend the complaint in the amount of 30 days from the date of the order or longer period to allow me to consult with opposing counsel in good faith since I believe the courts and the government are in peril. I believe the courts are our hope of a hero to prevent or reverse an economic crash, which appears to be designed to eliminate the government down the line. I hope the court may use this case to safeguard the Const limits which preserve these United States from demise.

Court overlooked the fact I have colorable claims against the DE Sup Ct and its members in both their professional and personal capacity, under an Ex Parte Younge theory as well as equitable claims for prospective and other relief. In *Ex Parte Young*, 209 U.S. 123, 28 S.Ct. 441, 52 L.Ed. 714 (1908). [The Court's conduct which I should be afforded to plead below in concealing evidence, sealing my petitions, firing necessary witnesses, inciting attacks against me in the open by 10/21/20 letter and additional acts made to knowingly upset, harm and vitiate my 1st Am rt to Pet before it thereby vitiating the liberties I sought to protect is outside the scope of its professional discretion]

DE brought a disc case against me to conceal and cover up its violation of federal laws and my Constitutional rts, and to punish me for the exercise of Constitutional rts including but not limited to the First Am rt to pet the courts for disparate treatment by its own members based on religious-political-or poverty animus and procedural DP violations. DI 2-4 My religious beliefs in Jesus outlined in my petitions are the source of Defendants adjudication of disability. They indicate my religious beliefs confuse Defendants. They cite my belief in the Bible as a source of the disc proceeding at Number 7 of the petition. They cite my protected private speech outlined in my private petitions outlining my private religious beliefs and exercise of religious beliefs in the letter dated August 23, 2023 as the source of concern of disability.

The baseless allegations the panel cites, that I allegedly "lack competence to practice law and endanger prospective clients, the public and the orderly administration of justice" is to cover up my petitions to the courts for the governments' violation of the Constitution and federal law, including its own violations. The State Court intentionally secretly sealed my petitions in violation of my First Am rt to petition to conceal material evidence in my favor to cover up its own violations of my procedural and substantive DP rts. This concealment is also a procedural DP violation.

The Court asserts my legitimate arguments are not cogent, in order to cover up its own misconduct, while further covering up State misconduct by adjudicating me disabled. It may not be convenient to uphold justice. It is easier to orderly administer standardized injustice than to uphold the 1st Am app to the State via the 14th to accommodate individuals whose religious beliefs or arguments are not standardized to the common norms. Nevertheless, the asserted Constitutional limits supersede eliminating freedom for convenience, productivity and administration of court business.

Freedoms are not for sale, or none are free. We are for sale products to bargain favor with foreign and private government partners. My license to practice law was not exchanged for the freedom to belief in Jesus Christ or other Constitutional liberties.

Appellate Court improvidently cites to the mere allegations that my religious beliefs in the petitions are not clear, unfocused [to the Defendants' aim] and confused the Defendants. My religious beliefs need not be clear, nor do they need to understand them for me to assert my First Am rt to genuine religious belief without a government incited substantial burden but for the exercise of religious belief and other First Am rts. Moreover, they are relevant to this matter, Kelly v Trump, and the disc proceedings even if Defendants do not find my religious belief in Jesus Christ not money as savior and God reasonable. *Matthew* 6:24.

Appellate Court improvidently cites the false allegation my pleadings "were non-complaint with the Court rules." There is no rule I violated during Kelly v Trump, or the DE Disc proceeding since my asserted 1st Am invoked rts to religious belief and 5th Am rt against self-incrimination supersede the compelled mental examination despite my invoked objections on Constitutional grounds of religious objection and interference in my access to the courts in the exercise of the 1st Am rt to petition in Kelly v Trump supersede state rules. It is my religious belief the field of mental health, psychology, psychology and behavioralists teach the way to certain damnation in the fires of hell by teaching physical, chemical, environmental conditions also known as temptations may be manipulated to control a person's no longer free will in contravention with the teachings of Jesus Christ.

Moreover, the Defendants were non-compliant with disc rules 9 and 12, preemptive federal law and the preemptive Constitution limits which restrain their conduct within the purview of superseding federal laws.. The allegation my defense of religious beliefs contained in my speech "were confusing and unfocused and irrelevant to the issues at hand" are to cover up the very real issues that were relevant to whether the disability proceeding was brought in retaliation for my exercise of the rt to pet the State over the course of about 20 years, and my rt to private religious-political belief, private-religious exercise of belief, private rt to associate based on religious-political belief without being restrained by a mere license to practice law, and rt to equal protections, procedural DP and to be free from collusion to intimidate me to cause me to withdraw my petitions in Kelly v Trump in violation of 1985 and 1988, the First Am app to the state pursuant to the 14th Am, other federal law, and state claims for intentional or reckless infliction of emotional distress, defamation and other claims...

This Court errs as a matter of law and as a matter of fact by claiming the "DE Sup Ct's order adjusting her status, claiming she was denied notice, discovery, an impartial judge, an ability to present evidence and witnesses, and the like are beyond the scope of this appeal." I asserted these claims in legal and factual arguments below, including in my motions of reagument. They are material to the District Court's clear error of fact, clear error of law and this appeal to prevent manifest injustice against me, and others by creating case law which will chill the exercise of professionals' religious beliefs under the threat they may no longer buy and sell and die of want.

This case presents a unique important Const question as to whether a disc proceeding brought to punish petitions against the government, in violation of the US Amend I rt to petition, and rt to speech on subject matter grounds, or other Const exercise

and the Equal Protections Clause is subject to voidability. Defendants seek to discipline Colleague Richard Abbott for petitioning against the County and Courts. Are the courts above the law, or will this Court rule judges may be corrected within the purview of the Constitutional limits 1. Cases and controversies and 2. impeachment, without vindictive retribution for correction.

This case presents a unique important Constitutional question as to whether a disc proceeding brought in violation of the Equal Protections Clause based on disparate treatment with religious-political animus, place of origin animus too. [I was born in PA] Two DE judges demeaned me based on place of origin. Judge Slights [told] me to go back to PA and a second Judge Court of Common Pleas Judge Smalls called me a Philadelphia lawyer…

The DE Supreme court may not restrain me in following my chosen professions on the basis of fact determinations concerning their fitness made in proceedings in which I was denied the traditional procedural safeguards of confrontation and cross-examination. See, Amend I, VI, and XIV, regarding procedural DP. *Also See, Greene v. McElroy*, 360 U.S. 474, 492 and 493(1959) ("the rt to hold specific private employment and to follow a chosen profession free from unreasonable governmental interference comes within the "liberty" and "property" concepts of the Firth Am," and so by extension the 14th Am), *Dent v. West Virginia*, 129 U.S. 114; *Schware v. Board of Bar Examiners*, 353 U.S. 232; *Peters v. Hobby*, 349 U.S. 331, 352 (concurring opinion); cf. *Slochower v. Board of Education*, 350 U.S. 551; Truax v. Raich, 239 U.S. 33, 41; *Allgeyer v. Louisiana,* 165 U.S. 578, 589-590; *Powell v. Pennsylvania*, 127 U.S. 678, 684"). The US Supreme Court extended the 6th Am asserted rt of confrontation in noncriminal matters. *Mattox v. United States*, 156 U.S. 237, 242-244; *Kirby v. United States*, 174 U.S. 47; *Motes v. United States*, 178 U.S. 458, 474; In re Oliver, 333 U.S. 257, 273, *Southern R. Co. v. Virginia*, 290 U.S. 190; *Ohio Bell Telephone Co. v. Public Utilities Commission*, 301 U.S. 292; *Morgan v. United States*, 304 U.S. 1, 19; *Carter v. Kubler*, 320 U.S. 243; *Reilly v. Pinkus*, 338 U.S. 269. Nor, as it has been pointed out, has Congress ignored these fundamental requirements in enacting regulatory legislation. *Joint Anti-Fascist Committee v. McGrath*, 341 U.S. 168-169 (concurring opinion).

The DE Disc procedure was so lacking in notice or oppty to be heard before the DE original disc proceeding as to constitute a deprivation of DP in the DE form and that there was such an infirmity of proof as to give rise to the clear conviction that this court could not, consistent with its duty, accept as final the conclusion on that subject in that the Delaware Sup Ct covered up material evidence by sealing pleadings to my defense, firing two material witnesses to my defense, denying me the write to subpoena them or to perform discovery,

I was denied the reasonable oppty under the circumstances to conceal the fact the DE Sup Ct fired two witnesses material to my defense. Moreover two members of the DE Sup Court retired from the DE bench in hopes to evade service. It is notable I sought to substitute President Biden for President Trump to dissolve his continuation of former President Trump's misconduct in the establishment of government religion by partnering with churches in government business, eliminating the freedom by compelled force for me as a party of one.

This Court must hold that [Defendants] must uphold and not violate the Constitutional laws that protect claimants including me and Richard Abbott, Esquire

without exhibiting partiality and bias towards itself, members and the appearance of the courts' members."

I am a Christian lawyer who was attacked by the state by the request of the DE Sup Ct members through its arms and agents to cause me to forgo my lawsuit against former President Donald J. Trump ("Trump") to punish me for my exercise of the private 1st Am rts to petition, private-speech contained in the private-petitions, affiliation, private religious beliefs and exercise of religious beliefs and in retaliation for my 1/7/2021 and 2/5/2021 petitions to exempt bar dues for all attorneys facing economic hardship.[44] I filed a private Religious Freedom Restoration Act, 42 USCS § 2000bb (1-4) ("RFRA") lawsuit *Kelly v Trump* in the Chancery, No. 2020-0809, DE Dup Ct No. 119-2021, and the USSC No. 21-5522, as a private party to protect my private-First Am free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Donald J. Trump and current President Joseph R. Biden from enforcing executive orders creating a union of government-religious entity partnerships, including enjoinment of Executive Order No. 13798, maintained and reestablished by President Biden by his enforcement of E.O. 13798, and President Biden's enforcement of Ex. Or. No. 13198, Jan. 29, 2001,[45] and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 ("executive orders").[46]

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[44] (Exhibits A, A-4, A-5, B, attached hereto and incorporated herein in its entirety). I incorporate all references in their entirety whether by Delaware District Court Docket Item Number ("DI") or Third Circuit Docket Item ("3DI"). 3DI-121-11, 12; 3DI-126-9, 10, 11; See, US Amend I, XIV, also see, App 1-B, App. 1-C letters requesting exemption from bar dues, and App 1-D, the information sent to the Appellate below when I initially appealed showing the DE Supreme court incited Del-Lapp and the ODC to interfere with Kelly v Trump to cause me to forgo my case.

[45] as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. No. 13199, Jan. 29, 2001, as revoked by Ex. Or No. 13831, May 3, 2018; Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010; Ex. Or. No. 13559, Nov. 17, 2010; Ex Or. No. 13831, May 3, 2018

[46] See Exhibit A, (initial complaint in Kelly v Trump. Albeit, I petitioned on Trump's E.O. 13798 granting churches the license to give candidates and parties parishioners' donations, verbal support and church backing before I included arguments upon the horrific discover of the other orders in other petitions in the Delaware Courts. See US Supreme Court No 21-5522 on this court's dockets)

These executive orders allow money or support to be transferred between government agents and religious organizations to perform government business. I believe the money or support in the bought or bartered for, not free union of church and state, is one reason why religious-political attacks have increased in recent years, including government incited religious-political attacks against me. President Biden's Valentine's Day executive Order, Ex. Or. No. 14015, Feb. 14, 2021, is troubling since it appears to allow government money to be bestowed to religious organizations, like churches in other countries, to perform government business under the guise of charity in contravention of the Establishment Clause and my religious beliefs[47]

In *Kalman v. Cortes*, 723 F. Supp. 2d 766, 769, (2010) this USSC held the "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." I reasonably believed the Executive Orders violated the establishment clause in light of *Kalman*, especially Trump's E.O. 13798 which permits churches to back candidates and parties using the donations from parishioners to serve the political vanity of men which I believe is blasphemy by making man God's anointed instead of Jesus. I believe the executive orders also violates Jesus's teachings in *Matthew* 6:1-4, and 6:24. President Trump also incited religious-political persecution against people for their projected religious beliefs based on not supporting him in his formal government position, or his Republican party, or the religious organizations which supported his presidential candidacy, including me as a party of one, (as a Christian, Catholic, Democrat who exhibited opposition to Trump by drafting 5 proposed articles of impeachment which I contacted all 541 federal law makers to impeach on), substantially burdening my free

[47] Matthew 6:1-4, John 2:16 (Per Jesus Christ, Giving to get is business. Those who do business as worship or charity are not welcome in heaven. They will die in hell on judgment day should they not repent. I do not want people to die in hell.)

exercise of religious belief, **by a course of conduct which I argue also establishes government-religion**, causing people to attack me, talk about shooting me, throw things at my vehicle, actually shooting two bullets in the home of Delawarean Greg Layton based on political beliefs, kill, harm or attack others based on religious or political belief substantially burdening my free exercise of religion, speech, and political-religious affiliation, as I outlined in Kelly v Trump to this Sup Ct at pages 23-25, including but not limited to:[48]

> "1. appointing a personal spiritual advisor, and alleged Christian leaders to advise the President, creating the religious backing and the appearance of Godly guidance supporting Defendant's government authority;
> 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;
> 3. hypocritically claiming "Biden will hurt the Bible;
> 4. persecuting people who exercised their freedom to worship or not by the dictates of their own conscience, not government-religious commands, by demeaning those who omitted the word God in the pledge of the allegiance;
> 5. improperly sharing his alleged prayer to God, while acting under the color of the law;
> 6. creating the illusion there is a war on Christmas, by liberals like me;
> 7. repeating the government-religious belief that he may be the chosen one by God, contributing to the government-religious belief Trump is anointed by God;
> 8. moving the US embassy in Israel to Jerusalem for a religious group, Evangelicals;
> 9. sponsoring and inciting private persecution towards liberals by churches and its parishioners, by 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;
> 10. tweeting 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;'
> 11. signing another Executive Order, Ex. Or No. 13831, May 3, 2018, which increases the temptation for government employees, including the President, to back religions financially or otherwise, in hopes to receive their government backing and government support in return under E.O. 13798; and
> 12. using his son to glorify him as the savior of Christianity, when I believe Jesus the Christ is the savior under Christianity. Eric Trump said his "father 'literally saved

[48] Citing DI 4 and 3DI-121-6, pages 23-24; See Exhibit D regarding attacks too. Also see (DI 20) Plaintiff's Motion for Reargument, filed 11/8/21, Delaware District Court No. 21-1490, and exhibits thereto, and (DI 21) Plaintiff's Motion to Amend Plaintiff's Motion for reargument, and exhibits thereto, including Plaintiff's Amended Motion for Reargument filed 11/9/21, where I talked with a police man and discovered it was a mere gym-mate who looked at my car and the substance thrown on it. The police who talked with me about strangers talking about shooting me did not file a report.

> 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"

"The very adoption or passage of a policy that violates the Est Cl represents a const injury." *Santa Fe Independent School District v. Doe*, 530 U.S. 290, 314-315 (2000). The Executive Order and Trump's policy of persecution is a const injury. The Const does not grant Trump by nature of his position as President a license to demean those with diverse political and religious beliefs like me foreseeably and actually subjecting me to physical, social and economic injury to chill not merely political speech but religious speech, exercise of belief under the threat of death. The Courts, not twitter should restrain Presidential speech within the restrictions of the law not the partial subject choice of social media platforms where Congress removes judicial authority to private partners who are part of the plan to eliminate the courts by design. There is plan to eliminate the courts and this court's deference to past case law and third parties cannot prevent it. The courts must consider this new threat of harm anew with the guidance of petitioners. Should the courts or petitioners get it wrong, the people's check on the government, the rt to petition is the tool to remedy any injury. My petitions in *Kelly v Trump* warranted oppy to be heard before I was deprived of DP rts to protect my religious exercise of belief from substantial state and federal burdens by disparate selective persecution against me as a party of one. Const principles "'forbid the judiciary, as well as the legislature, of a State to interfere with the free exercise of religion.'" *Kreshik v. St. Nicholas Cathedral*, 363 U.S. 190 (1960). Nevertheless I was disparately treated based on the state's desire to chill and substantially burden my exercise of religious beliefs based on disdain towards my religious-political association, beliefs outlined in my speech in the petitions in violation of Equal Protections, based on viewpoint in speech, and the 1st Am rts app to Defendants via the 14th. Am. This case arises

based on DE attacks against me, and judicial acts exceeding the scope of their professional authority to **sabotage my RFRA case against President Trump** by writing on my praecipe,[49] instructing me to cross off local counsel's address to obstruct service, misleading me to miss the deadline to file, sending third parties to attack me in private including Common Pleas Judge Clark at a store, inciting additional threats against me by its arms not limited to sending 3 letters, endangering my life and liberty with knowledge of threat of death and my health limitations[50], and the harm to my health based on Trump's establishment of government religion[51], DE Sup Ct secretly firing material witnesses in my favor, and preventing me from calling them to conceal the fact the DE Sup Ct colluded with Defendants and private people in concealing evidence in

[49] (See Letter dated 4/26/22 letter and attachments thereto); See, Isaacs v. Caldwell, 530 S.W.3d 449, 455 (Ky. 2017) ("Nothing in the civil rules or statutes governing the initiation of a civil action….permits the clerk to withhold issuance of the summons ") The US Supreme Court held in Wetmore v. Karrick, 205 U.S. 141, 142 (1907) "The judgment of dismissal of June 12, 1899, having been entered improvidently through a mistake or oversight as to an entry of record, the Massachusetts court did not thereby lose jurisdiction, and had the power to vacate the dismissal and restore the case to the docket after the term. The Palmyra, 12 Wheat. 1; Alviso v. United States, 6 Wall. 457. Rice v. Railroad Co., 21 How. 82, distinguished. " Also see, Isaacs v. Caldwell, 530 S.W.3d 449, 455 (Ky. 2017) The US Supreme Court in Wetmore v. Karrick, 205 U.S. 141, 142 (1907), further held, "In almost every case in which the rule is laid down by this court that judgments cannot be vacated after the term, judgments of dismissal by mistake are excepted." See Phillips v. Negley, 117 U.S. 665 (1886) ("Final judgments at law cannot, by proceedings taken after the close of the term at which they were entered, be reversed or annulled for errors of fact or law by the court which rendered them; except that clerical mistakes, and such mistakes of fact not put in issue or passed upon as may be corrected by writ of error coram vobis (or on motion in place of that writ where such practice prevails), and a mistake in the dismissal of a cause, may be corrected after that time: "); Sibbald v. The United States, 12 Pet. 488, 492, "no court can reverse or annul its own final decrees or judgments, for errors of fact or law, after the term in which they have been rendered, unless for clerical mistakes;" Phillips v. Negley, 117 U.S. 665, 674 (1886); BANK OF KENTUCKY v. WISTAR ET AL 28 U.S. 431 (1830) (Clerk and staff's clerical error allowed reform of judgment after the fact); US Supreme Court held in St. L. S.F.R.R. v. Spiller, 275 U.S. 156 (1927), "Errors by court "due to mistake of the clerk may be corrected after expiration of the term at which the judgment was entered."

[50] (DI 4 Ex 43, DI 3, evidence of harm to health at both Exhibit 10). I have religious objections to healthcare, mental healthcare and science. I believe people sin should they not repent of idolatry for trusting in or telling others to trust the science, the professional or what product or service they are selling us unrestrained by love, the holy spirit convicting us of sin, or the just rule of law to prevent them from being above the law when they harm life, health or liberty for material gain. I believe people sin for using people as subjects in science even if they should gain their . especially if they paid to do it for instance by gathering statistics and data for the NIH or CDC. Making men and what idea, product or service they are selling us God, makes them above the law reflecting the image of the devil., and violates Equal protections in favor of experts and professionals and bias against those they harm for mammon.

[51] DI 4, Exhibit 10. Healthcare blood pressure results. There are 2 exhibits 10 sorry about that.

my favor and other unconscionable acts to cause me to forgo my case against Trump where I sought to dissolve the establishment of government religion.[52]

Defendants initiated the board proceeding after I filed this case to punish me for suing Trump based on my religious beliefs contained in the petitions per Defendants 'admission in 8/23/21 letter and Petition at 7. New claims and evidence concerning the DE courts collusion arose. I asserted my 1st and 6th Am rts to self-represent app to the state via the 14th Am in the quasi criminal proceeding on religious grounds by giving prior notice to defendants by email and subsequently by submitting petitions to the state board and court. Despite my prior objection with legal grounds against appointment of counsel the Board docketed notice on **12/10/21**. No notice was sent to me or anyone on my behalf on **12/10/21**. Counsel was subsequently appointed **12/13/21**. Days later counsel contacted me. I did not accept representation. I fired him immediately and drafted a motion specially objecting to lack of any notice which prejudiced me, objecting to appointment of counsel, and moved for a fair oppty to prepare and perform discovery after the issue of counsel was addressed on or about **12/18/21**, filing it with both the Board, defendants and DE Sup Ct. I drafted and filed a series of motions thereafter objecting to representation asserting religious objections to examinations while preserving objections to lack of notice. I fought so hard against being compelled to violate my 1st and 6th Am rt to religious beliefs in Jesus by appointment of counsel app to State via the 14th Amend that I fell ill with the shingles. I was so emotionally distraught that the Ct violated my asserted religious beliefs to self-represent in order to defend my license or to gain access to the courts that postal worker April reported the fact I did not feel safe to the police as I mailed out the first motion for reagument in this matter. The deprivation of my asserted 1st and 6th Am rts app to DE via the

[52] See Complaint April 2021 letter attached hereto and incorporated herein.

14th caused foreseeable emotional distress. The police made a welfare check. I attested someone talked about shooting me based on my political speech on my car. I confided I did not feel safe based on Trump's incitement of violence against a demography that included me a democrat-Christian who does not support Trump's candidacy. He asked why I did not report it. I said I thought I did, but the police man I told appeared to be a former gym-mate outside of his jurisdiction when he looked at substance thrown at my car. I placed a police report concerning a neighbor who threatened me numerous times based on his disdain for my political signs on the record, attached hereto as exhibit to the complaint. I reasonably did not feel safe, especially since another friend had two bullets go into his home based on his political beliefs and speech. The appointment of counsel deprived me of obeying Jesus for 20 days in violation of my 1st am religious belief app to defendants and DE Sup Ct via the 14th Am. "The loss of First Am freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Dr. A v. Hochul*, 142 S. Ct. 552, 555 (2021). The denial of the 6th Am asserted rt to self-representation is a structural error not subject to harmless-error review. I filed motion after motion. Finally, the DE Sup Ct granted me the rt to self-represent, but denied motions 2 days before hearing depriving me of appealing to safeguard rts before vitiation, ignoring 5 by not addressing them as to deprive me of an opportunity to be heard at all or on appeal. DE Sup. Ct refused to docket appendix initially. Had to fight for DP and was deprived in the partial unfair forum partial to itself not the impartial application of the Cons to the rule of law. DE committed other deprivations I cannot fit herein but incorporate from record. I should be granted leave to amend the complaint to include.

VI. CONCLUSION I respectfully request this Court vacate the Orders below, and remand the case back to District Court for review.

Dated: March 8, 2024

Respectfully submitted,

Meghan Kelly

/s/Meghan Kelly
Meghan Kelly, Pro se
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693
US Bar 283696

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

Dated: March 8, 2024

Meghan Kelly (printed)

Meghan Kelly (signed)

Thank you Lisa Nesbitt Kelly v Swartz/Meg asserts right to live/religious objections to healthcare, science and mental healthcare by idolatry Meg believes leading to hell by making men and men's desires or creation master/guide/God in place of God

From: Meg Kelly (meghankellyesq@yahoo.com)

To: lnesbitt@supremecourt.gov

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

Date: Wednesday, March 20, 2024 at 07:10 PM EDT

Hi Lisa Nesbitt,

Thank you for sending the boxes back swiftly. I like your brilliant idea to label the pages like the attached to prevent needless review of letters by the clerk.

That was absolutely brilliant. Thank you.

I received 13 boxes per the attached pictures. 6 were dropped off in the morning of March 16 with a note that the postal staff would come by in the afternoon to drop off 7 more. She came by and dropped off 7 more on March 16.

I appeared to be only missing a box labeled 13 of 14, which I think included two copies of the exhibits to the IFP Motion, which I printed out. I have not gone through the Petition and Exhibits to the petitions yet. I am hoping I have one original and ten copies. I really hope I do not have to print additional copies for the court.

Actually the 13 out of 14 box came today 3/20/2024 and included two copies of exhibits to the IFP.

I redid the Informa pauperis motion and labeled the exhibits A IFP, B IFP, C IFP so they will not be confused with the exhibits to the petition. Thank you for letting me know I could draw on the exhibits with a marker even if the ones I filed electronically are naked. I was scared they would be rejected if different. Thank you for confirming it would be acceptable.

I tried to use the PDF writer per the attached. I drafted another Informa pauperis motion to reflect these changes and to condense it together to add additional information.

I appreciate your time and help. Talking to you offers clarity and prevents hours, days and weeks of needless work. That makes people staff irreplaceable by automation.

I copy opposing counsel to keep her apprised.

On an aside, I am not feeling so well. I had harmful surgery as a teenager. I have to drink obscene amounts of water and get additional rest and exercise for about a week every month in order to sustain my health and not die. I have had to assert my religious right to live and not die for the vanity, or convenience of others for more than 20 years. I provided the attached to all courts not limited to DE Courts. I assert my religious exercise of belief to live and not die or harm my health or eternal life before this court too.

I have religious objections to science, healthcare and mental healthcare. I actually believe people sin risking damnation in the fires of hell for even carelessly telling others to trust the science, professional or expert because it makes imperfect men God and guide and their work or product God and guide in place of God. See Romans 1:25. See Matthew 12:36-37 ("I tell you, on the day of judgment people will render an account for every careless word they speak. For by your words you will be justified, and [b]by your words you will be condemned.")

Plus, I have religious objections to government's partiality towards business by deferring to science, professionals and experts by sacrificing freedom in violation of equal protections despite the lengthy case law excusing it under a rational basis standard. I also hold religious beliefs against partiality in the courts towards professionals, science and experts as opposed to the impartial application of the Constitution to the rule of law which prevents private and public entities and people from killing, stealing and destroying human life, liberty or health for convenience or

material gain. Human sacrifice is against my religious beliefs.(Also see, Leviticus 19:15 ""You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge your neighbor fairly"); (see, Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, Deuteronomy 16:19, "Do not deny justice or show partiality"); (also see, Deuteronomy 1:17, "Show no partiality in judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God. And bring to me any case too difficult for you, and I will hear it.").

I believe judges can save souls from hell by restraining people from committing human sacrifice of other people's lives and liberties for material gain.

I do not write to offend but to assert my religious beliefs from vitiation even by this court.

I see a case for conference March 28, 2024 where a lady believes like I do. No. 23-665 Tina Goade v Astrazeneca Pharmaceuticals, LP and Department of Employment and Economic Development or social services.

In her petition counsel avers. "...she also believes [certain healthcare the vaccine] is harmful to her body, which she believes is a 'temple of the Holy
Spirit,' App. 74a."

In the Bible at 1 Corinthians 6:19-20 provides: "Don’t you realize that your body is the temple of the Holy Spirit, who lives in you and was given to you by God? You do not belong to yourself, 20for God bought you with a high price. So you must honor God with your body."

In the Bible at 1 Corinthians 3:16-17 provides: "Don’t you know that you yourselves are God’s temple and that God’s Spirit dwells in your midst? 17If anyone destroys God’s temple, God will destroy that person [in hell the second death]; for God’s temple is sacred, and you together are that temple."

I believe our body is a temple of God and that God will destroy people in hell who ignorantly, indifferently or intentionally harm other people's bodies for material gain should they not be made clean by turning away from such evil and by sinning no more. N

I do not want people to go to hell. So, I oppose exploiting and harming people for profit, research, learning or other material gain. I have religious objections to my data being used or tracked for statistics too.

I believe people go to hell for using people for research even with their consent because it makes people products to exploit for material gain instead of to respect unearned required. I believe people go to hell for blindly doing what they are told to do, trained to do, without regard to how their business harms others. They are blinded by desire for material necessities to care for their own, they do not love others. Matthew 13. I believe courts can help the blind see, to prevent people from oppressing one another to get as much as they can for as little at the cost of harming others.

When we look at others with what Jesus calls the evil eye in Matthew 6:22-23 we have a heart of an idolator looking to extract money, material gain, contributions loving the convenience or material benefit from people driving out our love for them...

With regards to the Wisconsin case on requiring Catholic Charities to pay unemployment. I believe Catholic Charities violates Jesus's teachings by teaching business is charity. See Matthew 6:1-4 to confirm Jesus says they will have no reward from their father, meaning no salvation from death, should they not repent.

Distinguish this when a preacher collects money based on need of the building and the preacher's salary or staff who preach. They do not do business including fundraisers. I do not see asking for yourself based on need as sin. But giving to get is business. Preachers ask for alms out of their own need, not greed, not even the praise of men by taking donations to give to another under the guise of giving from self, which is sin. Teaching business is charity leads to damnation in hell by teaching people to love money driving out their love for one another and God and turning to money as savior. Since Jesus teaches you cannot serve God and money, I believe they serve greed not good leading to damnation in the fires of hell without turning away from evil and being made clean. Matthew 6:24.

Further, I do not think it is sin for needy people to ask for help unearned required. I do believe Jesus teaches people will go to hell for not helping people in secret directly and will go to hell the second death for what they failed to care to think to do.
See, Matthew 25,

"Then He will say to those on His left, ‘Depart from Me, you who are cursed, into the eternal fire prepared for the devil and his angels. 42For I was hungry and you gave Me nothing to eat, I was thirsty and you gave Me nothing to drink, 43I was a stranger and you did not take Me in, I was naked and you did not clothe Me, I was sick and in prison and you did not visit Me.’ 44And they too will reply, ‘Lord, when did we see You hungry or thirsty or a stranger or naked or sick or in prison, and did not minister to You?’ 45Then the King will answer, ‘Truly I tell you, whatever you did not do for one of the least of these, you did not do for Me.’46And they will go away into eternal punishment, but the righteous into eternal life."

Also see, Luke 10:25-37:
The Parable of the Good Samaritan
25 On one occasion an expert in the law stood up to test Jesus. “Teacher,” he asked, “what must I do to inherit eternal life?”
26 “What is written in the Law?” he replied. “How do you read it?”
27 He answered, “‘Love the Lord your God with all your heart and with all your soul and with all your strength and with all your mind’[a]; and, ‘Love your neighbor as yourself.’[b]”
28 “You have answered correctly,” Jesus replied. “Do this and you will live. [meaning not die in the second death in hell]”
29 But he wanted to justify himself, so he asked Jesus, “And who is my neighbor?”
30 In reply Jesus said: “A man was going down from Jerusalem to Jericho, when he was attacked by robbers. They stripped him of his clothes, beat him and went away, leaving him half dead. 31 A priest happened to be going down the same road, and when he saw the man, he passed by on the other side. 32 So too, a Levite, when he came to the place and saw him, passed by on the other side. 33 But a Samaritan, as he traveled, came where the man was; and when he saw him, he took pity on him. 34 He went to him and bandaged his wounds, pouring on oil and wine. Then he put the man on his own donkey, brought him to an inn and took care of him. 35 The next day he took out two denarii[c]
and gave them to the innkeeper. ‘Look after him,’ he said, ‘and when I return, I will reimburse you for any extra expense you may have.’
36 “Which of these three do you think was a neighbor to the man who fell into the hands of robbers?”
37 The expert in the law replied, “The one who had mercy on him.”
Jesus told him, “Go and do likewise.”

This parable of the Good Samaritan complies with true alms verse false alms Jesus discusses in Matthew 6:1-4.

The church is set up to fall by deeming religion business. Religion is not business. Jesus teaches in John 2:16 those who do business as worship are not welcome in his father's house, meaning they will go to hell, bummer.

Teaching religion is business teaches the way to hell by eliminating unconditional love by making everything conditional by compromise or bartered for exchange. There is a scheme to eliminate freedom of religion by making freedom for sale no longer free but business. Some things are not for sale. Constitutional liberties are free. They are not for sale; or they are not freedom.

The elimination of freedom of worship towards compelled stakeholder worship of mammon as master, guide and God, the way to hell, is part of the global agenda.

Unfortunately eliminating the governments to eliminate the rule of law from restraining private and public organizations from enslaving, harming and sacrificing humanity for utter control is part of the plan too.

There is a time of lawlessness under the lie eliminating laws and governments is freedom schemed. Those with power connections and profit will rule unrestrained by love, God or the law because entities and associations or groups act collectively with no capacity to do good by unconditional love. Only people have the capacity to unconditionally love or serve. That makes people judges, people attorneys like my opponent and people judges special and more powerful than all the money in the world.

Our only hope of a hero are the courts, but they keep tanning my butt instead of saving it. I cry as I type this. I do not know when the end will come where many people will go to hell, bummer. Jesus says no one knows that time, but there is a planned lawlessness. If the courts prevent the time of lawlessness by maintaining control as to what the rule of law is tempered with the people's legal check the right to petition with fair opportunity to be heard on petitions, we may have more time to save more souls from hell.

I went to law school because I believe courts can save lives and eternal lives. I believe Judges have this power to do good, even if they believe differently or find my religious beliefs weird. See Amos 5:15, Matthew 23:23.

Thank you Lisa Nesbitt.

Very Truly,
Meg
Meghan Kelly
34012 Shawnee Dr
Dagsboro, DE 19939


Brilliant Idea Lisa Nesbitt thank you.pdf
866.3kB


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Exhibit 43 to Appendix F.pdf
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UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

MEGHAN KELLY

V.

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

Meghan Kelly, by and through her own pr se representation, brings this Verified Complaint pursuant to 42 USC Section 1983, 42 USC Section 1985, Federal Rules of Civil Procedure, Rule 65, the First Amendment of the US Constitution, and the Fourteenth Amendment of the US Constitution, and contemporaneously therewith, Pro se

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

THE PARTIES

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

2. Defendant Disciplinary Counsel Patricia B. Swartz ("Patricia," and individually and collectively with one or the more Disciplinary counsel or their agent, Disciplinary Counsel Kathleen M. Vavala, and Chief Disciplinary Counsel David White

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

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

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

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

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

7. Preliminary Investigatory Committee ("PI") is an organization tied to the state of Delaware. It is considered an arm of the court, and a state agency who may be

reached care of the ODC at The Renaissance Centre, 405 North King Street, Suite 420, Wilmington, Delaware 19801 (Individually and collectively, the ODC, PR, and PI may also be referred to herein as Defendants or Defendant).

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

JURISDICTION

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

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

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

12. My claims against Defendants arise from Defendants' acting under the color of government authority in the state of Delaware, specifically “under color of statute, ordinance, regulation, custom, or usage, of [the] State [of Delaware subjecting me, or causing me to be subjected] to the deprivation of “rights, privileges, or immunities secured by the Constitution and laws” including my First Amendment rights, and my

license to practice law, in violation of 42 U.S.C. § 1983, and in retaliation for my First Amendment exercise applicable to the Defendants pursuant to the Fourteenth Amendment right to petition the Chancery Court and United States Supreme Court to seek protection for the exercise of my fundamental right to exercise speech, religious belief, association, and the right to petition, and separately the right to petition, as an impoverished citizen of the United States with limited resources to plead my case, as a party with an active license to practice law defending my personal liberties, as an unrepresented party, not acting as an attorney advocate on behalf of another, as a Christian with personal religious beliefs, as a Christian-democrat, as a Catholic, as a Democrat, as a citizen with unique personal beliefs that do not conform to the world's trained, conditioned, compelled beliefs.

13. The conduct in issue arises in Delaware.

FACTS

BACKFROUND, HARM TO MEGHAN KELLY

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

individual liberties, and in conspiracy to interfere, impede, or obstruct my separate lawsuit, *Kelly v Trump*.

15. This United States District Court case arises upon actions by state government agents taken, under the color of state authority and color of law, statute or regulation, to retaliate, and to unlawfully pressure Plaintiff to forgo her case, or to impede or obstruct my access to the courts in a civil rights lawsuit, *Kelly v Trump*, Case Number 21, 5522 in the US Supreme Court, Case Number 119, 2021 before the Delaware Supreme Court, and Case Number 2020-0809 before the Chancery Court for the state of Delaware (referred herein as "*Kelly v Trump*"), where I am seeking relief to protect my free exercise of religion, speech and association without government sponsored economic, social or physical persecution, substantially burdening such exercise. Attached, please find documents I filed with the United States Supreme Court, Case Number 21-5522, as US Exhibit, to be incorporated herein in toto pursuant to the Federal Rules of Civil Procedure, Rule 10 (c), and referred herein as "US Ex" with reference to documents herein, identified by the marked exhibit letter or number therein with the term ("US Ex"), and the named Exhibit therein. Also attached, please find the Exhibit labeled "Us Exhibit Appendix Table of Contents," which outlines each of the exhibits in US Exhibit.

16. I brought this law suit to enjoin proceedings brought by Defendants' Conspiracy to interfere with a party, me, and my civil rights pursuant to 42 U.S.C. § 1985 (2)(b), where Defendants seek to place my attorney license on inactive disabled, to obstruct justice in *Kelly v Trump* and to punish me, impede my case from going forward or to suppress or discredit my religious beliefs, speech, prevent my continued petition before the Chancery Court and, or the United States Supreme Court, and to seek relief from the

Defendants' interreference of my exercise of my First Amendment rights, including the my right to seek the protection of the court by petitioning the court for relief, my exercise of speech, religious beliefs and association (individually and collectively, these four rights also referred herein as "civil rights,") in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment, and to prevent punishment from the Defendants for the exercise of my speech, religion, and association which Defendants seek to suppress or discredit by disparaging me as "inactive disabled" in an official proceeding, *Kelly v Trump*.

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

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

19. Defendants in violation of 42 U.S.C. § 1985 (2)(b), with two or more persons, including but not limited to Defendants, ODC, Patricia, Judge Kenneth Clark,

and DE-Lapp employee, Carol Waldhauser ("Carol") and Eleanor Kiese ("Kiese"), Delaware agents, or arms conspired unlawfully to pressure Plaintiff to forgo her case to protect her free exercise of religion, or to obstruct, deter, by force of government authority, intimidate, impede and threaten, a party, me, Meghan Kelly in the Chancery Court, and, also in the United States Supreme Court case *Kelly v Trump*, from attending such courts, of from "testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party … in (her) person or property."

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

21. Defendants seek to injure me in my person or property by 2. initiating investigations and proceedings to place me on inactive disabled status on my active fully paid license to practice law, seeking to take away my property interest in my active license to practice law, and preventing my ability to seek a job as an attorney or in any other field with such a defamatory label, thereby potentially committing me to a life of poverty without the prospects of finding a job.

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

23. Defendants seek to injure me in my person or property by 4. intentionally or recklessly causing emotional distress manifesting in physical symptoms for the exercise

of my First Amendment rights to petition, speech, exercise religion, and association, in violation of those rights.

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

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

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

27. A few people have called me, a democrat, a "demon-crat," making jokes that are not funny. If they go beyond a joke, it is no laughing matter. There have been attacks against fellow Americans based on party orientation have gone beyond jokes in recent years. See US Ex-Ex 23, relating to 54 cases invoking former President Trump in cases in connection to threats or violence. See US Ex-Ex 24 relating to former President Trump encouraging the militarization of police arguably to combat citizens who exercise their freedom to associate to speak to protest his government policies. See, US Ex-Ex 25, where former President Trump manufactures the threat that protestors exercising their freedom of speech and association will loot. Thereby, Trump, a government agent,

encourages or incites private people to shoot or attack protestors to defend property against false threats, chilling the protestors freedom to associate and speak by government incited private attacks, and militarization by police to use violence against individuals who pose no risk of looting. Also see, US Ex-Ex 10 relating to Trump insulting people of the Jewish faith for not supporting Trump. Also see US Ex-Ex See, US Ex-Ex 11 relating to Trump's call for discrimination against Muslims.

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

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

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

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

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

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

34. Jesus taught you cannot serve God and money. *Matthew* 6:24. Money is not my savior, and is not what drives me to get up each day, my love for God is. The fact the defendants do not understand my belief, does not make me "disabled" for thinking and believing differently.

35. People talk about President Trump as "anointed by God." See, US Ex-Ex 34, Fox News, '*I hope it's true': Trump responds to claim he was chosen by God*, By Caleb Parke, June 25, 2020; US Ex-Ex 34, Fox News, *University professors say more church*

goers believe Trump is 'anointed by God', By Caleb Parke, May 13, 2020; US Ex-Ex 36 CBS NEWS, *Trump tweets quote calling him the "second coming of God" to Jews in Israel*, By Sophie Lewis, Aug. 21, 2019.

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

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

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

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

40. Should the Defendants be permitted to label me "disabled" and I am in actual danger in the future, that label may prevent other people from taking me seriously

or from helping me. I am scared of potential violence taken against me.

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

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

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

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

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

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

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

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

the 8th Amendment's protections against cruel and unusual punishment. US Ex-Ex. 7, and see US Ex-15, to see more laws I allege former President Trump violated in my proposed articles of impeachment.

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

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

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

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

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

53. I will continue to critique policies and laws and suggest more just decrees to prevent hardship, as opposed to unjust decrees that exploit need to make material gain

off of hardships, instead of alleviating the need of the people.

54. I desire to prevent evil planned schemes by using my freedom to speak without government sponsored persecution or suppression of my speech by forcing the defamatory title of "disabled" upon me, for believing the ways of Jesus instead of the ways of the world which I believe the bible teaches are controlled by business greed, temptation to reflect the evil one, not the image of God by love for humanity. See, 1 *John* 5:19 "We know that we are children of God, and that the whole world is under the control of the evil one." Also see, 1 *John* 4:16 "God is love." When we sacrifice worldly gain to care for those in need at a worldly loss, that is reflecting the image of God by unconditional love, not conditionally caring based on relationship, reward or avoidance of harm.

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

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

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

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

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

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

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

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

63. Janet Yellen also has participated in meetings at the Bank of International

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

64. The President through an executive order or Congress through the coining power has the power to eliminate the debt, fully pay for federal expenses, instead of increasing the debt ceiling as former Federal of Reserve Chair, Janet Yellen suggests, which may make the government become a debtor nation to the World Bank, no longer a free country.

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

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

67. I learned we do not have a free market. We have a manufactured forced controlled market stifling innovation under the guise, the lie, that more money to fund greed will create more innovation when it rewards more misbehavior into infinity for a

different drug, or research product, or different use for the same product or bad business through bailouts, or fundraisers or grants to give money to the wrong doers who caused the problem.

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

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

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

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

good. US Ex-Ex A.

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

73. Secular Government Welfare, as opposed to charity, to care for individuals in need is commanded by God. See, *Deuteronomy* 24:19, "When you reap your harvest in your field and have forgotten a sheaf in the field, you shall not go back to get it; it shall be for the alien, for the orphan, and for the widow, in order that the Lord your God may bless you in all the work of your hands." See, *Leviticus* 23:22, 'When you reap the harvest of your land, moreover, you shall not reap to the very corners of your field nor gather the gleaning of your harvest; you are to leave them for the needy and the alien. I am the Lord your God.'" *Ruth* 2:2-3 And Ruth the Moabitess said to Naomi, "Please let me go to the field and glean among the ears of grain after one in whose sight I may find favor." And she said to her, "Go, my daughter." So she departed and went and gleaned in the field after the reapers; and she happened to come to the portion of the field belonging to Boaz, who was of the family of Elimelech." *Exodus* 23:11, "You shall sow your land for six years and gather in its yield, but on the seventh year you shall let it rest and lie fallow, so that the needy of your people may eat; and whatever they leave the beast of the field may eat. You are to do the same with your vineyard and your olive grove." This allows the poor to pick up and gather the crops and sell them or use them for food.

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

75. Congress can take back its delegated power to coin money without

borrowing it to care for its people. This will not deter people from working, and may be used within limits for those in need as opposed to exploiting need to serve greed, to care for, instead of exploit, the elderly, the unemployed, the poor, and people with disabilities and disease, while safeguarding each of these individual's freedom.

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

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

78. Our leaders have been implementing policies in the founder of the world economic forum, Klaus Schwab's books, with the founder's goal of illuminating freedom, free will, by forced economic need to survive in a sort of cyber fiefdom model.

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

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

vehicles and more, to force people to lose title to their real property.

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

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

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

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

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

86. There is land dedicated to government bodies in Sussex County on the condition such land is not resold. The obvious intention of the deceased grantors was to preserve nature, wetlands and natural habitats. The government entities misbehaved by granting 99-year leases, where the trees were bull dozed, nature destroyed, the land leased,

and homes were built and mortgaged on said 99-year leases, ignoring the obvious intended condition of the dedication, preservation of nature to gain more government money through leases or transfer taxes, and favors from developers who build mortgaged homes on the 99-year leased real property.

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

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

89. Who will correct the government agents in the executive and legislative branches from misbehaving? Who will have standing in court? How can we reduce prevent government agents from giving into temptation to harm people's lives, health and the environment to serve business greed, by barter or exchange, the mark of the beast, not mark of good or love? These are all questions I ponder. I think the solution is to safeguard the freedom to criticize government policies and practices, even the freedom to be wrong, or to have different ideas, without government retaliation, which includes the freedom for me to bring a law suit against former President Trump to dissolve government-religion, as protected speech.

90. I am also concerned about the state's plan to reassess real estate to increase

taxes because the increase in real estate taxes will prevent potential home owners from buying a home by rendering it unaffordable by increased taxes, and possibly push home owners out of their home, ending private ownership of real estate per the sinister plans of the world economic forum.

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

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

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

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

those they are charged to serve.

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

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

97. Entire professions appear to be controlled not by free will, freedom of thought to innovate, but a forced will by funding and donations to schools, businesses, not for profits, charities, and through the conformed compelled will of those providing continuing professional classes, and professional organizations like the office of disciplinary council, all stifling improvements that otherwise may be made by the free exchange of ideas, to gain the control or profit of entire industries by a few under the veil of science or guise of serving the public, while I believe damning most of humanity to

hell for *Matthew* 6:1-5 violations, teaching business greed is good.

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

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

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

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

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

https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N -40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ

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

https://carterheavyindustries.files.wordpress.com/2020/12/covid-19_-the-great-reset-

klaus-schwab.pdf. Attached as District Court Exhibit 8 and District Court Exhibit 9.

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

104. Per *The Fourth Industrial Revolution*,

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

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

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

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

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

108. President Lincoln created debt free, interest free money by signing the Act of Feb. 25, 1862, ch. 33 § 1, 12 stat. 345.28. President Kennedy signed FR 5605, Exec. Order No. 11110, which also created money, without exploiting the masses to pay it back to those who do not earn it, but take it, essentially giving free lunches to those already fat, serving greed, not need, arguably in violation of the 13th Amendment. See *the Creature of Jeckyll Island, a Second look at the Federal Reserve*, by Edward Griffin, 7th printing 1998, which may be found at:

https://ia802609.us.archive.org/14/items/pdfy--Pori1NL6fKm2SnY/The%20Creature%20From%20Jekyll%20Island.pdf , for more

information on how money is created. Also see Exhibit H which contains excerpts from the book. Please note, I disagree with the author's theories premised on violating God's law by attacking welfare, and social security, as welfare is commanded by secular laws in the bible too.

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

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

since they will lose their own money as opposed to the depositors' funds should debt not be repaid, preventing bank crashes and inflation.

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

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

113. Another problem arises, the stock market is a ponzi scheme too, by selling

I owe yous, what people do not have in the form of shares of stocks, and what they may lose should businesses go under by design to get tax write offs.

114. I am not sure how to prevent the elderly from losing their retirements by design. Bad businesses should fail. Individual businessmen, members, executives, partners and other leadership positions, who profit off of stock buy backs, may store profit, salaries and bonuses in off shore accounts which are not susceptible to losses in economic crashes should not be rewarded. The system is rigged by design for the shareholder or the tax payer through bailouts to pay the cost for losses which fund unjust gains for bad business. Even if the wrong doers pay cost, they may be able to write them off in tax breaks, but it is rather difficult to pierce the corporate veil, rendering members, partners and others within entities essentially above the law of accountability by design.

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

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

117. The United States Supreme Court indicated President Lincoln's paper money was constitutional, overturning a prior case. In *Knox v Lee*, 79 U.S. 457 (1871), the U.S. Supreme Court held that the Legal Tender Act, which authorized the printing of paper

money, President Lincoln's Greenbacks, not redeemable in gold or silver, nor creating debt or incurring interest, did not violate the U.S. Constitution. In so ruling, the Court reversed its earlier decision in *Hepburn v. Griswold*, 8 Wall. 603, 623, 19 L.Ed. 513. There is a way out to reverse or prevent a planned economic crash.

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

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

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

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

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

123. I am obviously going to care about other people, the world and our country enough to think of ways to prevent the wicked global schemes from happening, though I

see implementations of the policies step by step occurring before my eyes. Defendants procedure to remove my active license to practice law as disabled inactive would diminish my voice, making my free speech, quieted by the controlled forced defamatory name calling by the Defendants, government agents.

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

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

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

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

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

129. My faith in God through the father, the son, Jesus, and the holy spirit is the most important thing in my life. By choosing to file the law suit *Kelly v Trump*, I chose to love God, by not standing by and allowing my God's name to be profaned by the establishment of government-religion that I believe glorifies man or sin in place of God,

under the guise of Godliness, misleading many people I love to hell, and to the suppression of my religious speech and practice by those who adopt the government-religion and silence my speech.

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

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

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

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

134. I have not worked as an attorney for over five years because I took time to do what is more important to me than earn money, serve God by seeking just decrees. As a Christian, I believe justice with mercy and correction to prevent condemnation are

commands by God. See *Matthew* 23:23, *Amos* 5:15. My license to practice law is no threat to the public given I am not representing anyone. I do not plan to represent anyone until the pandemic subsides, as my life is more important than money.

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

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

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

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

139. My younger friend, who used to attend Chamber events with me, allegedly befriended this same law maker. She told me he kissed her. That is so gross. When people go to someone for professional help, they should not have to essentially prostitute

themselves, not in the sexual sense, but by forming personal relationships in order to obtain professional help.

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

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

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

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

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

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

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

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

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

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

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

151. However, none of my efforts made a difference. So, I looked into running for President without violating my religious beliefs by asking for donations or signatures, without buying or being bought with money, but seeking the seat based solely on the vote.

152. I contacted the relevant election office in all 50 states regarding waivers

for their fee or signature requirements. Both would require I violate my religious beliefs.

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

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

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

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

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

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

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

158. I filed *Kelly v Trump* to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity partnership, including enjoinment of Executive Order No. 13798, maintained and reestablished by President Biden by his enforcement of E.O. 13798, and President Biden's enforcement of Ex. Or. No. 13198, Jan. 29, 2001, as amended by Ex. Or.

14015, Feb. 14, 2021; Ex. Or. No. 13199, Jan. 29, 2001, as revoked by Ex. Or No. 13831, May 3, 2018; Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010; Ex. Or. No. 13559, Nov. 17, 2010; Ex Or. No. 13831, May 3, 2018, and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 ("executive orders"). These executive orders allow money or support to be transferred between government agents and religious organizations.

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

160. My exercise of speech in the pleadings based on my religious beliefs, are in issue. In elaborating on my beliefs, I find it repugnant for the President and the United States government, state governments and local governments to use my God's name to glorify government or men in government or government business, by establishing government-religious unions in the form of partnerships, essentially making it appear they are working with God or are backed by God, to the extent it has caused physical symptoms related to my horror, clenching of teeth, tears, pain in my heart, sleepless nights and anxiety. Since I believe it misleads people into giving into temptation to sin, confusing them into thinking evil is good, believing a lie as truth, damning them to hell on the last day should they not be saved by the truth of love to conquer wicked lusts, to conquer sin. I believe glorifying business, (like glorifying marriage or child bearing or death, martyrdom, punishments for original sin) by performing business with religious entities as

Godly, teaches the mark of the beast, the mark of the whore, the twice dead, the mark of children of the devil is Godly or good. Business or work is a punishment outlined in *Genesis* 3 to teach humility, part of people's lives, not the purpose of life to be glorified and praised misleading people to hell by the sin of pride. The bible is clear. Not everyone is welcome in church or heaven. Those who do business as worship serve the God of money, not the God of the Bible. Jesus chased out those who did business under the guise of worship in the place of worship, church or temple. *John* 2:16. Those who do business under the illusion of Godliness are not welcome in church or in heaven should they not repent. Those who do business under the guise of good, Godliness, or love, when it is giving to get, for recognition, tax breaks, marketing, networking, trading favors or otherwise through fundraising, not for profits, pro bono, volunteering, organized charity, beneficial entities, beneficial corporations (I believe the new beneficial corporations violate Jesus's teachings in *Matthew* 6:1-5, while using other people's money, the shareholder's money, to potentially buy favors under the illusion of benefit or good, exhibiting the mark of the beast as beneficial, serving business greed, not good), not unconditional love, sacrificing material gain to care to love God or one another as ourselves, are not welcome into heaven. I believe they will be thrown into the fire the last day at the resurrection of the dead on the last day. Sadly, God teaches the confused, those who do not know, those who misunderstand will be destroyed the last day. Making people feel good, instead of helping them be good, have life and eternal life, is no good. It is bad and unloving. I would rather love people by dissolving this unholy, whored, bought or bartered or aligned union (supported by taking someone else's money, the tax payers to fund ventures), of government-religion, not free or based on freedom of church and state, to prevent deception

that damns, while also protecting people's freedom, their free will from the forced will of government-religious partners by economic or social pressure or temptation to compromise Jesus's teachings to meet worldly needs.

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

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

or weak employees, in the form of the rule of law, or love written on humanity's heart per Jeremiah 31.

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

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

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

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

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

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

169. I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. US Ex-Ex 5; (Also see, Leviticus 19:15 ""You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge

your neighbor fairly"); (see, Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, Deuteronomy 16:19, "Do not deny justice or show partiality"); (also see, Deuteronomy 1:17, "Show no partiality in judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God. And bring to me any case too difficult for you, and I will hear it.").

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

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

172. I am insulted by the Defendants claims against me as "disabled," but for my petition in *Kelly v Trump*, religious belief, association and speech. They insult my God. Thinking for myself and believing as I freely choose instead of the trained, conditioned, forced will of the government through entities who value money or professional business

over God as a savior, makes me of sound mind. My faith commands me to be separate, meaning do not sin just because the world sins. I should not be required to choose between the exercise of my first amendment rights to worship, speak, associate and petition, even as an indigent pro se party, even imperfectly, and even as an unemployed impoverished party who is licensed to practice attorney, and the maintenance of my license to practice law as active, as Defendants appear to require. I should be permitted the opportunity to work as an attorney, even though I value my faith in God, free speech, association more than work, and am not working at this time in order to stand up for Jesus in court, as a party, not as an attorney, at this most critical time in our nation.

173. During *Kelly v Trump*, I have been, at times, without access to a working computer, a printer, legal resources, even my vehicle at times, due to lack of means. That does not make me "disabled," incapable of performing attorney work. It makes me disadvantaged in my own case, where I am not performing attorney representation of others, as I would if I was employed with the adequate tools to conform to attorney work. Defendants require I lose the right to petition the court, as a party, not as counsel, if I am impoverished and without means to advocate as an attorney, or lose my license to practice law, as inactive, preventing me from ever gaining the means to represent others through employment with a law firm and possibly employment at other places.

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

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

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

177. Poverty is not a disability.

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

179. I am filing this case before the Honorable United States District Court in the District of Delaware to enjoin the Defendants retaliation against me for 1. exercise of my religion, speech, association, and right to petition grievances, and 2. for the First Amendment right to petition grievances related to *Kelly v Trump*, to prevent disciplinary proceedings for the exercise of my fundamental rights, based on Defendants' intent to cover up government agents' behavior, or to demean my credibility and reputation to belittle my speech, religion, association or petition for relief in *Kelly v Trump*, based on Defendants disagreement with my beliefs, speech, religion, and petition for relief, or to penalize me for speech, religion, association, poverty, and petitioning the court, as an indigent party, albeit even imperfectly to defend my First Amendment rights against government persecution.

180. All of the rights, my right to petition the court, my free exercise of speech,

religion, association are fundamental rights protected under the strict scrutiny standard, and must have a compelling or important justification to retaliate or punish me or violate, narrowly tailored to such justification.

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

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

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

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

negotiations until the issues in this case are resolved.

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

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

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

188. Patricia and the ODC Knew or should have known that interference with my exercise of my First Amendment Right to petition to safeguard my civil liberties from substantial burden, by so burdening my free exercise of the right to petition, speech, association and religious belief, by threat of pecuniary harm, taking away my active license would upset me causing emotional distress, embarrassment, humiliation, and pain in my chest. I attached evidence that I exhibited an increased blood pressure and pain in my heart but for caused by government sponsored attacks against me for the exercise of my civil liberties, including my free exercise of religion, speech, association, and freedom to petition the government to address grievances. US Ex-Ex 52

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

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

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

192. There is little question that once constitutional violation is made out under 42 USCS § 1983 plaintiff may recover damages for emotional distress, embarrassment, and humiliation, and in appropriate cases, punitive damages are also recoverable; in order to recover such damages plaintiff need only show that (1) he in fact suffered such damages, and (2) defendant's actions proximately caused plaintiff's injury. *Board of*

Trustees v. Holso, 584 P.2d 1009, 1978 Wyo. LEXIS 228 (Wyo.), reh'g denied, 587 P.2d 203, 1978 Wyo. LEXIS 245 (Wyo. 1978).

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

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

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

196. At the start of my case in *Kelly v Trump*, I did not have a working computer or a printer. Since the case began, I got a new computer, which broke twice, once after I filed a brief to the Delaware Supreme Court, and secondly on August 23, 2021, after I filed my writ of certiorari with the United States Supreme Court.

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

clean off of my computer.

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

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

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

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

202. The ODC and Patricia intentionally upset me in order to argue the fact I exhibited emotional distress makes me disabled, when it makes me a human with a heart, not a cold heartless person with the mark of the beast written on their forehead, by what I think, my heart and my hand by how I live. The fact I love God, myself and others instead of loving money and material gain makes me a Christian, who are "known by their love."

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

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

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

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

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

208. This is real life and Defendants place me in real danger, to be demeaned if something further happens to me, as "crazy." So others may say “do not listen to her.” I disagree with both the democrats and republicans and those in power concerning bad ideas

that are not solutions because I care about people above money and believe people's free will, freedom to choose should be protected from forced, conditioning, and that laws should correct misbehavior not reward bad business that exploits customers, poisons their food or water, harms their health under the guise of healthcare and pollutes.

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

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

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

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

SPECIFIC DELAWARE GOVERNMENT AGENT RETALIATION

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

214. "The interference with and potential prejudice to the right of access to

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

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

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

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

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

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

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

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

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

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

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

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

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

of someone I cared about.

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

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

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

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

231. Arline and I both complied, temporarily as covid 19 continued to wreak

havoc on the skeletal court staff that held up the Chancery Court in person, and I filed a Notice of Exception to a Vice Chancellor, who works with different court staff.

232. In addition, the ODC impermissibly interfered with this case by contacting Judge Kenneth Clark, per Judge Clark's admission, to interrogate me as if I was on trial for exercising my right to petition the Court to safeguard my freedom to worship Jesus Christ without government incited persecution, substantially burdening my exercise of my religious belief.

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

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

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

236. The Supreme Court's two-step Saucier analysis governs whether a government official is entitles to qualified immunity, considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the

right at issue was clearly established at the time of the alleged misconduct. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015)

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

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

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

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

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

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

243. I will face irreparable injury to my exercise of my speech, association, and exercise of religious beliefs by the government burden Defendants seek to cause upon me from such defamatory title, "disabled," embarrassment, emotional distress, lack of future employment, harm to my reputation if an injunction is not granted to prevent the Defendants from retaliating against me for exercise of my First Amendment Rights by bringing an action to declare me "disabled" but for my exercise of my First Amendment rights.

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

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

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

247. "A Government official's conduct violates clearly established law when, at

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

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

249. "The opportunity to be heard is an essential requisite of due process of law in judicial proceedings" *Richards v. Jefferson County*, 517 U.S. 793, 798 n.4 (1996).

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

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

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

letter contained in US Ex-Ex-A-5.

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

> "…is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the states agencies, even the courts via the 14th Amendment, disparate treatment within a class. I am likely not the only one out of work due to the pandemic. Others are struggling too. A case by case determination would likely be per se unconstitutional. I will likely never have standing to stand up for those similarly situated with myself. Yet, if I made such a request, I would be asking the Court to treat me with preference instead of impartiality as required by law. My conscience may not allow me to make such a request, tempting this Honorable Court to misbehave to serve my own gain. I can however, request that all fees for attorney registrations be the same regardless of years barred. So, I am making such a request for future consideration for 2022 and beyond. Please treat all lawyers the same by requiring the same lawyer registration fee for every lawyer, without persecution towards lawyers with more years of experience by an increased fee. There is no rational basis for an increase in lawyer's fees based on number of years, except the desire for more money. It is wrong to assume the longer you have been barred, the more money you have or must pay. I am saddened when I see unjust decrees and olicies based on the love of money, desire for money, at the cost of driving out the love for humanity, the people the state serves…" US Ex-Ex-A-5

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

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

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

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

exercise of my first amendment rights.

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

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

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

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

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

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

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

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

265. My speech concerning my beliefs and faith in Jesus may appear crazy to others, and yet even unpopular beliefs are protected. *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940). Nevertheless, I have the freedom to believe by the dictates of my conscience, no matter what the government through its agents believes. See *Matthew* 6:1-5. Also see, *State ex rel. Tate v. Cubbage*, 210 A.2d 555, 557, 1965 Del. Super. LEXIS 67, *1, 58 Del. 430, 433, ("It is no business of courts to say that what is a religious practice or activity for one group is not religion under the protection of the First Amendment. Nor is it in the competence of courts under our constitutional scheme to approve, disapprove, classify, regulate, or in any manner control sermons delivered at religious meetings."); See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025, 1981 U.S. App. LEXIS 16448, *1, (3d Cir.), cert. denied, 456 U.S. 908, 72 L. Ed. 2d 165, 102 S. Ct. 1756 ("It is inappropriate for a reviewing court to attempt to assess the truth or falsity of an announced article of faith. Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy. However, while the truth of a belief is not open to question, there remains the significant question whether it is truly held. Without some sort of required showing of sincerity on the part of the individual or

organization seeking judicial protection of its beliefs, the U.S. Const. amend. I would become a limitless excuse for avoiding all unwanted legal obligations."); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682, 134 S. Ct. 2751, 2759, 189 L. Ed. 2d 675, 680, 2014 U.S. LEXIS 4505, *1. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable."); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, 89 S. Ct. 601, 21 L. Ed. 2d 658 (1969) (holding that "the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion."); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, 194 L. Ed. 2d 231, 235-236, 2016 U.S. LEXIS 991, *10-12. See, *Holt v. Hobbs*, 574 U.S. 352, 352, 135 S. Ct. 853, 856, 190 L. Ed. 2d 747, 747, 2015 U.S. LEXIS 626, *1, 83 U.S.L.W. 4065, 93 A.L.R. Fed. 2d 777, 25.

266. I am allowed to think differently instead of being conditioned to worship as the state's forced will of materialism, pursuit of money, and unholy charity that damns people to hell per Jesus, such as fundraising or organized charity. Jesus teaches people "have their reward," meaning they have no reward, no eternal life from God. Matthew 6:1. I believe organized charity, fundraising, pro bono, and volunteering is no small sin. It is not true charity, but damns people to hell by teaching business, giving out of one hand to get out of another, is love. Love is unconditional. Business is not the sin. Teaching business is charity is the sin by driving love, God, out of the hearts of men replacing it with

the love of money. Jesus teaches you cannot serve God and money. I choose God.

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

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

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

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

271. As stated in my writ of certiorari and in a Motion to the Delaware Supreme Court,

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

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

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

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

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

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

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

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

278. When I took the Delaware Bar, I stayed in a dorm at Widener Law School as I took the Delaware Bar, my ceiling leaked and caved in destroying my bar material. I

requested replacement bar material. I waited a week or two, and then complained to either the Board of Bar Examiners or the Court.

279. An official in charge of the Bar at Widener, a partner with the Board of Bar examiners yelled at me for making him look bad.

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

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

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

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

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

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

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

287. I told RLF my admission would be delayed.

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

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

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

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

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

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

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

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

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

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

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

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

300. I was a nervous wreck as I was examined under the microscope of people who desired their own convenience, money or prestige, not the desire to safeguard my individual liberties, including the right to petition for grievances against the Board of bar examiners partners at Widener, and my right to freely worship my religion without

government agents substantially burdening my free exercise of religion to the forced, compelled exercise of their will, similar to now, making me relive painful experiences.

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

302. Duquesne, a Christian Law School responded by blaming me and hiking up the rent, just like the Board of Bar Examiners and the Defendants responded to my petitions for relief by retaliating against me and punishing me.

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

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

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

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

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

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

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

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

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

States Supreme Court.

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

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

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

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

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

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

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

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

318. An out of state stranger, proclaiming to be from Maryland, took off his mask and yelled at me, while getting uncomfortably close, accusing me of supporting President Biden. I feared he was potentially subjecting me to covid19. I did not know how an out of state stranger knew I did not support President Trump. I thought it might have been

because I proposed five separate articles to impeach former President Trump on and contacted all 541 federal members of congress concerning the articles.

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

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

321. The ODC intentionally threatened me with the August 23, 2021 letter to interfere with my appeal, by distracting me, causing alarm, in retaliation for the exercise of my speech, religion, association and right to petition the court.

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

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

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

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

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

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

> "This email is to confirm, I will not be evaluated, as such evaluations violate my religious beliefs. I alerted the US Supreme Court to the same in my petition for the writ of cert., relating to emotional damages related to the President's conduct. Desist impeding in my access to the courts without government obstruction and retaliation for my exercise of my first Amendment rights. I am an injured party, not an attorney practicing in this case. A Court staff member sought to sabotage my case by misleading me to almost miss the filing deadline to appeal the Master's final report, dated November 2, 2020. That same staff member instructed me to cross off the civil process clerk's address on a praecipe to impede the case from going forward. That member objects to my religious association beliefs in support of Trump and government agents exercise of religion while governing. Judge Clark also sought to interfere with my case. Government and court attacks against a party in an active case to impede justice, based on my case, is inappropriate and unlawful. I do not seek disciplinary recourse at this time should this arm of the Supreme Court and other members of the government refrain from persecuting me based solely on exercise of my Constitutional rights based on religion, association or poverty. Thank you" Delaware District Court Exhibit 24.

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

329. In the attached letter, incorporated herein by reference as an exhibit, District

Court Exhibit 25, dated September 27, 2021 Patricia and Defendant wrote:

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

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

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

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

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

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

> "The Third Circuit has held that '[w]hether an act is retaliatory is an objective question.' (citations omitted) To determine whether an act is retaliatory, a court therefore assesses 'whether the act would deter a person of ordinary firmness, not

> whether the plaintiff was deterred.' (citation omitted) As the *Mirabella* Court explained, there is good reason for this objective rule: Government officials should not be rewarded for "picking on unusually hardy speakers'"

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

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

337. 42 USCS § 1983 specifically affords injunctive relief against Defendants' conduct, seeking to penalize me for the exercise of my Constitutional rights because my religious beliefs, speech or association are repugnant to government actors, or they disagree with my speech, or seek to hide or conceal it or diminish my character as a means to persuade others not to listen to my speech.

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

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

340. The Defendants conduct seeking to place me on inactive disability status would prevent me from gaining employment with my old law firm or other firms, causing irreparable harm to my reputation, my livelihood, and my quest to serve God by proposing

just laws and policies to care for people, not exploit or oppress people to serve artificial entities without hearts who run on money and conditional labor, with no power to do good, as I believe only individuals can reflect the image of God by unconditional love.

RELIGIOUS BELIEFS

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

342. I am a Christian.

343. I believe in God, the Father.

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

345. I believe in God the Holy Spirit.

346. I believe that God loves me and all of humanity so much that he reveals himself in three different ways, the Father, the son, Jesus, and the Holy Spirit, to shed light, to guide us to eternal life, regardless of whether we reject his love, in the form of his guidance to save us from the final death.

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

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

349. I find guidance in the Holy Spirit.

350. I find guidance in God, the father.

351. I find guidance in the Bible.

352. Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, *Matthew* 23:11). Accordingly, living to serve self is not great.

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

354. I believe living for self, and your own family, your own community and for those who affect, serve and benefit you, thereby living for self, without regard to others reflects the image of Satan. (Please see, *Isaiah* 14:13-14, Satan wanted to live for himself. He wanted to be his own God, to be as high as God. Satan did not want to lay down his life for God, by in part, loving others as himself, even outsiders, even the least of these.); (See *Genesis* 3:1-6, Satan tempted Eve to be like her own God too, allegedly "knowing good from evil," to reflect the image of Satan, instead of placing God first by obeying God. God loves her and desired to prevent harm towards her. The command was for her benefit, like the commands are for our benefit to teach us the way through love to escape death. She died.); (Please see, 2 *Corinthians* 4:4, and the Book of Job, Satan the lower case "god of this world" has authority to confuse humanity, through people, desperate conditions and the worldly desires, to teach people evil is good and good is evil. So, folks will be damned to hell for their misunderstanding.); (See *Matthew* Chapter 13, Only those who understood were not burnt up to be destroyed. Misunderstanding may eternally kill you.); (Also see, *Matthew* 4:1-11, Satan tempted Jesus to live for self too. Jesus did not give into the temptation but lived to serve, God and humanity by being the light of the way to eternal life); (Also see, *Ezekiel* 16;49, People will be damned to hell for their unconcern "they did not help the poor and needy."); (Also see *Matthew* 13:18-19 "the worries of this life, the

deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, *Luke* 17:26-34 where Jesus also gave us examples of people merely caring for their own family and their own needs, working, buying and selling, eating and drinking, marrying and given into marriage before they were destroyed to be damned to hell for giving into tempting distractions of making money and making merry, and, or the anxieties of life while failing to understand the true purpose of life and eternal life, loving God and loving others as yourself, not exploiting others, outsiders to serve your greed); (Also see, *Matthew* 7:21 "Only those who do the will of God, go to heaven.); (Also see, *Matthew* 16:24, *Luke* 9:23, *Matthew* 10:38, and *Mark* 8:34, regarding true followers must stop doing what they desire to do, and do what God desires instead. Loving others even if it is painful.)

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

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

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

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

good by reflecting the image of God by unconditional love.

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

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

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

362. This inherent conflict of interest of self-first mindset, of members or partiality towards perceived partners, even the courts, within our professional organizations, collectively diminishing the free will of individual members to a conditioned

will to form across the board professional standards, stifling innovation created by something more valuable than money, the minds of the individuals. So professional standards guarantee worse for consumers, and harsh penalties towards professionals who care to use their conscience mind to care for consumers outside of the standards, stifling free debate to improve, by the forced will of professional standards.

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

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

UNEMPLOYMENT-HEALTHCARE-RELIGIOUS BELIEFS

365. I have religious beliefs that governed my choice not to work the past two years. Over the past two years, I proposed articles of impeachment and shed light on unjust laws to prevent condemnation in hell and harm here.

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

367. I believe justice is guiding people to know they are loved, respected as

worthy of life, unconditionally, unearned, required by God, and to care about others, unearned, unconditionally, or get corrected in court for exploiting, harming or oppressing others to serve your own by the love of money or otherwise.

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

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

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

371. Whenever the Bible says "woe to you," I understand that to mean, damned to hell are you should you not repent by unhardening your head, heart and hands, by

reflecting love, not absence of love for others unconditionally, not based on relationship, reward or avoidance of harm.

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

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

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

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

376. I took time off to serve God, without pay, by drafting articles of impeachment, and to propose other legal solutions to alleviate or prevent foreseeable harm without pay. I filed *Kelly v Trump*, C.A. No. 2020-0809-PWG (Del. Ch. Nov. 2, 2020), in the Delaware Chancery Court to serve God and safeguard my God's name as holy because

I love God, and seek to worship him without government sponsored burdens and persecution. If I was working, I would not have been able to file the law suit, as it would likely turn business away from my employer.

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

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

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

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

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

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

383. I believe nurses and doctors are still damned to hell for not knowing treatment causes harm. Preventing their punishment for straying from the standards to use their free will, their brain, to think, to care, to know, to love those they serve, safeguarding

patients above pockets, is a just policy. Also protecting those the court is correcting by preventing injustice guaranteed by relying on professional associations which per se, value the bottom line more than humanity. Since associations run on the bottom line, unable to reflect the image of God by love.

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

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

386. I believe testing blood is sin. I also believe people go to hell for cremation or for grinding up bones. So, I do not eat things with gelatin or gel cap medicine in them. By cremating bones people show they do not care to know God or love God. God teaches our loved ones are not in heaven or thrown into the fire of the second death yet. The bible teaches about the resurrection of the bones with a potential new body to be judged for eternal life or the second death. See, e.g. *Revelation* 20:13, *Ezekiel* Chapter 37, *Matthew* 25:32-46. Many self-proclaimed Christians sadly adopt this pagan belief that the dead are already in heaven and hell. That is not what God, the father, Jesus, the son, or the holy

spirit teach. It is an eternally deadly error to teach lies as truth, to give comfort in a lie, without repentance. Throughout scripture we learn people are damned to hell for adding to scripture or getting it wring should they not correct themselves. Yet the watchmen are damned to hell for failing to share truth too. I know God. I am placing my life and eternal life on that partial, not yet complete knowledge of God.

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

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

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

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

391. My personal experience is why I studied healthcare history in a course at UD, and focused on healthcare finance and healthcare law in a couple of courses. Our healthcare kills more than it heals, harms, and I believe damns people to hell forever by

masking pain inhibiting people's free will, ability to think clearly, preventing them from choosing to do God's will, damning them guaranteed should they die drugged up or in a medicated coma.

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

393. I ran as a democrat and democrats, disagreed with me by wanting more care, which meant more bad care since funding is more easily gained by using people as test dummies for new or different treatments, not necessarily better.

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

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

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

397. I have other objections to healthcare beyond what I write here. In the *Fourth Industrial Revolution*, written by the founder of the world economic forum's founder, other

wicked schemes are proposed to harm life and human life under the guise of DNA improved healthcare. Schemes were shared in his book back in 2016. Since Bill Gates, a partner to the World Economic Forum is assisting in vaccines, I fear people are being exploited as lab rats for experiments that may harm them without protections in the form of the rule of law to require caring for patients, and correction if harm results. Instead, our laws allows and rewards hiding of wrongs, and rewards ignorance and not knowing, as knowledge is tied to culpability. So, it is sadly discouraged.

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

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

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

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

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

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

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

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

406. I believe government funded policies that care for those in need without requiring indentured servitude such as volunteering, or work are biblical. Government policies lifting up those in need unconditionally, without enslaving them, by requiring they

pay it back or pay it forward, reflect love, by respecting the dignity of human life, unearned, free. Under our Constitution, I believe this freedom is required, otherwise oppression is guaranteed in the form of exploiting desperate conditions, violating the Thirteenth amendment. U.S. Const. amend. XIII.

407. I believe government funded policies that care for those in need without requiring indentured servitude such as volunteering, or work are required by God in secular laws. Government policies lifting up those in need unconditionally, without enslaving them, by requiring they pay it back, by volunteer work requirements, or pay it forward, reflect love, by respecting the dignity of human life, unearned, free. Under our Constitution, I believe this freedom is required. Otherwise, oppression is guaranteed in the form of exploiting desperate conditions for entities and individuals to get as much as they can for as little as the can, violating the Thirteenth amendment, and violating God's laws by unjust gains. U.S. Const. amend. XIII. See. *Proverbs* 1:19, 15:27, 28:8, *Habakkuk* 2:9, 2:12, *Ezekiel* 22:12-13, 22:27, *Isaiah* 56:11, *Jeremiah* 6:13, *Psalm* 10:3, *Isaiah* 5:8 "Woe to you who add house to house and join field to field till no space is left and you live alone in the land."

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

409. While the Food bank still exploits the needy by forced volunteers, requiring volunteers, and requiring people to pay for a driver's license and transportation instead of directly helping people, not through entities, it is not those in need who sin. It is those who exploit them for profit and praise who sin, such as the farms and donors who gain tax breaks

for donating, as well as marketing or the praise of men. (See, *Matthew* 6:1-4. I believe organized charity, fundraising, bake sales, car washes, selling girl scout cookies, pro bono, and forced work, forced volunteering leads to exploitation and many to lose eternal life in hell, by driving out love from the hearts of men replaced with business greed, the mark fo the beast.)

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

411. I believe only individual humans can do good by reflecting the image of God by loving others unconditionally. *Genesis* 1:27, "God created mankind in his own image.," *Colossians* 3:10, Cf, the image of the beast, by absence of God, by absence of unconditional love, *Revelation* 13:15, "the image of the first beast.," See, 1 *John 4*:16, "God is love.," 1 *Corinthians* 13:4-8 "love… is not self-seeking…" I believe Jesus when he teaches people will be damned to hell for their unconcern, what they failed to sacrifice materially to those in need, directly, without worldly reward or recognition, Godly reward for a worldly loss. *Matthew* 41:46.

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

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

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

415. I also believe people go to hell for failing to forgive monetary debts. *Deuteronomy* 15:1 ("At the end of every seven years you must cancel debts."), *Deuteronomy* 15:2 ("This is the manner of remission: Every creditor shall cancel what he has loaned to his neighbor. He is not to collect anything from his neighbor or brother, because the LORD's time of release has been proclaimed."), *Jeremiah* 34:14, *Matthew* 18:21-35, *Matthew* 6:12,14,15, *Proverbs* 21:13. I love people, and do not want people to go to hell by requiring I pay them unjust debt I cannot afford.

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

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

418. My parents have helped me with money given I listed as a gift, without

interest, that I will pay back if and when I am able, on my Motion to file in forma pauperis.

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

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

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

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

423. They both are old and tired. I hope the lingering symptoms related to blood cuts and clots that block blood from carrying oxygen to vital organs, causing organ shut down and covid toes do not harm them. Viruses may stay dormant in the body. Covid19, like the flu is quickly morphing, meaning vaccines and pills will have little results in preventing the spread due the quick mutations of these type of viruses. Masks on the other hand, reduce the spread. I am scared they may die soon, though they now test negative.

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

suspend my car insurance again, due to inability to pay.

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

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

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

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

429. I choose to fight for my faith, to exercise my belief in Jesus Christ without

government suppression of my speech, substantial burdens on my associations and substantial burdens on my free exercise of living my faith, by doing the will of God, even if I do not know how I will get by each day. I choose to have faith.

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

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

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

432. Defendants acted in retaliation against me, by initiating proceedings to place my license to practice law on inactive disabled, but for the exercise of my First Amendment right to free speech, to freely exercise my religious belief, association and the right to petition the government for redress of grievances and (2) in direct violation of the First Amendment right to petition the government.

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

434. Defendants continue to retaliate against me based on my First Amendment exercise of the right to petition, speech, associate and exercise my religious

beliefs. I face irreparable injury to my free exercise of speech, association, religion, right to petition, reputation, pecuniary harm, and a substantial burden to work as an attorney, or anywhere else, should this Honorable Court not enjoin the Defendants.

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

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

437. Defendants' retaliation against me for the exercise of my First Amendment Right to petition for grievances based on civil rights in violation of the First Amendment applicable to the Fourteenth Amendment would cause irreparable injury to others. I seek to use my voice to prevent the elimination of social security, to prevent the elimination of private ownership or real property per the world economic forum founder's plan, prevent the elimination of the 47 percent of the jobs in the US, including lawyers, and to prevent an economic crash by recommending changes to the banking system, proposing similar Executive orders that Presidents Lincoln and Kennedy passed that would divert the planned elimination of the dollar and economic crash, and to prevent other harms. My reputation would be tarnished, diminishing my speech from being considered, should Defendants be permitted to punish me, to retaliate against me for the exercise of my Civil rights. Other people would suffer.

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

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

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

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

442. I discovered, I hate trial work, but I love God. So, I chose to stand up for my religious belief in Jesus Christ by filing *Kelly v Trump*, even if I am the only one. I

should not be punished by government agents for my strongly held, individual religious beliefs, even if those beliefs are repugnant and conflicting to those strongly held beliefs of government agents, even the courts.

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

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

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

445. Defendants conspired with De-Lapp, an arm of the Delaware Supreme Court by taking adverse action against me, a threatening letter requiring I respond within ten days, allegedly based on that conduct of petitioning the Court for grievances for either my request or bringing the law suit *Kelly v Trump* with intent to punish, retaliate, harass, interfere, or pressure me to forgo my lawsuit in *Kelly v Trump*, in conspiracy

with Defendants, and Judge Clark, in violation of 42 U.S.C. § 1985 (2)(b) and/or to gather information to be used by Defendants to retaliate against me by bringing an ODC complaint against me, but for the exercise of my protected conduct, petitioning the Court for relief related to attorney dues, or petition the courts for relief in *Kelly v Trump*, in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment.

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

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

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

448. Defendants retaliated against me by seeking to punish me by taking away my paid for active license to practice law, to harm my reputation, to hide government mistakes and misbehavior I sought to address or to punish me based on my religious

beliefs, constitutionally protected speech, association, or poverty in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment.

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

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

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

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

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

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

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

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

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

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

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

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

PRAYER FOR RELIEF

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

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

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

Dated: Oct. 21, 2021

Respectfully Submitted,

/s/Meghan Kelly

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

Bar Number 4968

TABLE OF DISTRICT COURT EXHIBITS

District Court Exhibit 1 Photo of white substance that appeared to be thrown at my car based on my speech, the stickers, Impeach.

District Court Exhibit 2 Police report relating to neighbor yelling at me for placing up a political banner.

District Court Exhibit 3 Notice of Police investigation of two bullets going into Mr. and Mrs. Layton's home.

District Court Exhibit 4 Proof I reached out to people regarding laws and policies.

District Court Exhibit 5 Example of comments to CLE providers

District Court Exhibit 6 World Economic Forum article, 8 predictions for the world in 2030, by Ceri Parker, dated November 12, 2016.

District Court Exhibit 7 Emails relating to Trump entity buying up land, and evidence of the fact my computer broke and was wiped clean

District Court Exhibit 8 *The Fourth Industrial Revolution*, by Klaus Schwab, 2016 version, excluding additional pages of the 2017 updated version published by Portfolio Penguin, which may be found at https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ

District Court Exhibit 9 *Covid-19: The Great Reset*, by Claus Schwab and Thierry Malleret, Portfolio Penguin Publishing, published 2020, by Forum Publishing, which may be found at

https://carterheavyindustries.files.wordpress.com/2020/12/covid-19_-the-great-resetklaus-schwab.pdf

District Court Exhibit 10 President Obama's response to some of my comments, including a a Christmas card and a letter spelling Delaware incorrectly.

District Court Exhibit 11 The Honorable Master Patricia W Griffin's kind letter, dated December 7, 2020, granting me relief from my December 1, 2020 request.

District Court Exhibit 12 Letter I wrote to the Honorable Master Patricia W. Griffin, dated December 11, 2020, thanking for her unexpected kindness, as I am not accustomed to gaining help when I ask for it, and exhibits including a newspaper article concerning rats in my apartment at law school.

District Court Exhibit 13 January 7, 2021 letter to the Chief Justice asking for an exemption of attorney license fees for lawyers unemployed during the pandemic, with attachments of negotiations with my former law firm

District Court Exhibit 14 Meghan Kelly's employment contract to work for RLF for $135,000 a year, dated November 20, 2006

District Court Exhibit 15 Correspondence from my peers relating to the Delaware Bar, including Travis Turner's attestation that I was not disruptive or even noticeable at the bar review course located at Widener Law School.

District Court Exhibit 16 Letters of recommendation vouching for my character

District Court Exhibit 17 My Complaint and court filings against the Board of Bar examiners.

District Court Exhibit 18 March 29, 2007, torture determination by the Delaware Board of Bar Examiners to delay my admission to the bar to make their partner a counselor money.

Exhibit 19, Duquesne A CD where I saved a file to be opened as a file not as a CD, of a news clipping where newscasters tried to help me.

District Court Exhibit 20 The Post Gazzette Newspaper, *Rat is an unwelcome study partner*, by Lawrence Walsh, dated June 29, 2005

District Court Exhibit 21 ODC's letter to me dated August 23, 2021

District Court Exhibit 22 An e-mail from me to the ODC to desist, dated August 23, 2021

District Court Exhibit 23 The US Supreme Court docket for Kelly v Trump, 21-5522

District Court Exhibit 24 An e-mail from me to the ODC to desist, dated August 28, 2021

District Court Exhibit 25 The ODC's letter to me dated September 27, 2021, threatening to disbar me because of my law suit *Kelly v Trump*

District Court Exhibit 1


IMPEACH

District Court Exhibit 2

Page	Report Date	Agency	Complaint Number
001	05/16/2020	TROOP 4 STATE POLICE	04-20-028917

Reported Date and Time	Field Service Report	Occurred
Wed 05/13/2020 1151		Wed 05/13/2020 1151

Location:
34012 Shawnee Dr, Dagsboro, DE 19939
0.10 Miles Southwest of Trails Rd

Grid	Sector	County	Domestic Related	Gen Broadcast Sent?	Gang Related?	Gun Related?
202 - 074	44	Sussex	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No

Officer Weapon Involved:	Officer Weapon Type:	Officer Weapon Use:	Emergency Order Related:
☐ Yes ☒ No			☐ Yes ☒ No

Crimes and Associated Information

Victim Number	Crime Seq	Statute	Crime Description
000	001		

Location of Offense	Status	Involvement	General Offense
		☐ Alcohol ☐ Drugs ☐ Computer	

Suspected Hate Bias	Crime Code
☐ Yes ☒ No - N/A	8105 - Non-Criminal

Witness Information

Sequence	Type	Name	Sex	Race	Age	D.O.B
001	Reporting Person	KELLY , MEGHAN M	Female	White	[redacted]	[redacted]

	Home Telephone	Cell Phone	Work Phone
34012 Shawnee Dr Blackwater Vlg Dagsboro, DE 19939	(772) 332-9719		

Sequence	Type	Name	Sex	Race	Age	D.O.B
002	Person Contacted	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

	Home Telephone	Cell Phone	Work Phone
[redacted]	[redacted]		

Investigative Narrative

On May 13, 2020 at approximately 1151 hours, I was dispatched to respond to 34012 Shawnee Drive Dagsboro Delaware in reference to a non criminal complaint. Upon arrival, I made contact with RP-Meghan Kelly who advised me that she put up political signs in her yard which face the roadway. RP-Meghan explained that she had written authorization from the HOA president that she could place the signs in her yard. When RP-Meghan placed a large banner in her front yard, she was confronted by her neighbo[redacted] RP-Meghan advised me that PC[redacted] yelled at her and told her to take the sign down because it was disgusting.

I made contact with PC[redacted] at his residence across the street from RP-Meghan's residence. PC-[redacted] said that RP-Meghan is crazy and he hated her signs because they were a disgrace. I advised PC[redacted] that he needed to ignore RP-Meghan and any political signs she puts up in her yard. PC-[redacted] acknowledged my request and advised me that there would be no further issue today. No further police action was taken by this department..

Department of Elections Not HOA

Reporting Officer	Supervisor Approval
CPL/1 KLAHR - 01449 0	Michael J Trestka PSPT433 05/18/2020

Detective Notified	Referred To

Solvability					Status
	☐ Witness	☐ M.O.	☐ Trace Stolen Property	☐ Suspect Named	Closed
	☐ Suspect Located	☐ Suspect Described	☐ Suspect Identified	☐ Suspect Vehicle Identified	

District Court Exhibit 3

Troopers Investigating Shots Fired Complaint-Camden

Camden – The Delaware State Police are investigating a shots fired complaint that occurred last evening.

The incident occurred on April 22, 2020, at approximately 9:14 p.m., when Troopers were dispatched to the 9000 block of Willow Grove Road, Camden, for reports of shots fired. Upon arrival, contact was made with the two victims who reside at the residence. The investigation revealed the residents were sitting inside when they heard gunshots coming from outside. After hearing the shots, they discovered a projectile hole in the wall above their heads. A search of the area conducted by Troopers located shell casings outside the residence and along the roadway. No one was injured during the incident.

Anyone with information regarding this incident is asked to contact Troop 3, Criminal Investigations Unit, Detective D. Blomquist at (302)697-4454. Information may also be provided by calling Delaware crime stoppers at 1-800-TIP-3333 or via the internet at http://www.delaware.crimestoppersweb.com

If you or someone you know is a victim or witness of crime or have lost a loved one to a sudden death and are in need of assistance, the Delaware State Police Victim Services Unit/Delaware Victim Center is available to offer you support and resources 24 hours a day through a toll free hotline 1800 VICTIM-1. (1800 842-8461). You may also email the unit Director at debra.reed@state.de.us.

You can follow the Delaware State Police by clicking on:

Delaware State Police Official Web Site

Facebook

Twitter

Nextdoor

Please tell us how we're doing via our Citizen Satisfaction Survey.

Presented by Public Information Officer, Senior Corporal Heather Pepper

Released: 042320 0850

District Court Exhibit 4

Fwd: Emergency bailouts/ coining power article 1 section 8 clause 3

From: Meghan Kelly (electmegkelly@icloud.com)

To: meghankellyesq@yahoo.com

Date: Sunday, August 23, 2020, 09:23 PM EDT

I lost this Email password but I communicated with federal lawmakers by this Email

Sent from my iPhone

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>
Date: March 18, 2020 at 4:02:20 PM EDT
To: Veronica Escobar <jaqueline.sanchez@mail.house.gov>, Mckayla Braden <mckayla.braden@gmail.com>, matthewkosiorek@comcast.net, Rep Martha Roby <luke.mcknight@mail.house.gov>, Lucy Mcbeth <matthew.golden@mail.house.gov>, lwvde@comcast.net, Joe Neguse <emma.salas@mail.house.gov>, Glenn Rolphe <grolfe@newszap.com>, sebastian.wigley@mail.house.gov, darin.mccann@coastalpoint.com, zoe.orrick@mail.house.gov, Hakeem Jeffries <zoe.orick@mail.house.gov>, wchandler@wsgr.com, Henry C Hank Johnson <tyrone.hankerson@mail.house.gov>, steve.koncar@house.mail.gov, steve.chabot@mail.house.gov, stacie.burton@yahoo.com, Pramila Jayapal Washington <sophie.bodlovich@mail.house.gov>, rep.bencline@mail.house.gov, W Greg Steube <reginald.darby@mail.house.gov>, president@duq.edu, ohi0ima@mail.house.gov, Shelia Jackson Lee <michael.pender@mail.house.gov>, mbraden@bakerlaw.com, lieu.staff@mail.house.gov, kyle.rush@mail.house.gov, Andy Biggs <kate.laborde@mail.house.gov>, Debbie Lesko <john.zwaanstra@mail.house.gov>, janice.bashford@mail.house.gov, house.jdems@mail.house.gov, Mike Johnson <hayden.hayes@mail.house.gov>, Matt Gaetz <dawn.mcarble@mail.house.gov>, David N Ciciline <carrick.heilferty@mail.house.gov>, Louie Gohmert <caralee.conklin@mail.house.gov>, John Ratcliffe <caleb.culver@mail.house.gov>, Ken Buck <brittany.yanick@mail.house.gov>, Val Butler Demings <brittan.robinson@mail.house.gov>, brian.garcia2@mail.house.gov, Zoe Lofren Representative California <arlet.adrahamian@mail.house.gov>, Madeline Dean <anneliese.israel@mail.house.gov>, andrea.anaya@mail.house.gov, J luis correa Representative <alysa.buckler@mail.house.gov>
Subject: Emergency bailouts/ coining power article 1 section 8 clause 3

Good afternoon,

During this national emergency do not borrow money thereby creating economic crisis down the line. Please coin it, limited to this the duration of the state of emergency. The constitution affords you the power to coin money under article 1 section 8 clause 5.

If you borrow money now you will foreseeable crash the economy down the line since you are forcing states to increase taxes by failing to do your part by taking care of the people with federal funds. Congress will foreseeable not have funds available for schools and roads and such.

Your job is to care for people not exploit them for profit.

Bailout all Americans 1,000 a month, even homeless people, without selective application so as not to violate the equal protections clause of the constitution limited to the duration of the emergency.

This will increase your stocks too. Since people won't be so scared to spend money roar. Teach people to love one another, not love money. Some of you wrongly teach those you serve to exploit others to serve greed. You misbehave.

For any bailouts during this economic crisis coin it. For the airlines require they help displaced Americans come home, and help foreigners stuck in the US go home too, if they so desire. Attach some strings with

that money please.

People do not earn worth. They are worthy of respect period. Businesses are artificial entities without hearts whose purpose is to earn profit. That is why you need to draft strings attached to teach businesses to care for people, love people, or get corrected. The nature of business is to earn money after all. That is not love. Love is unconditional. Business is giving to get, conditional payment of money, not unconditional charitable love.

Excuse typos

Side note, what about coining money to pay states to transform schools as emergency shelters for homeless, with waivers for immunity to prevent law suits. Coin money to pay closed restaurants to feed them only during this crisis. Is that a bad idea? I am not sure?? It would prevent crime and break ins due to the hunger and desperation of the poor.

You have the power to think outside of the box, to lead, not be misled by fear. You have the constitutional power to propose different solutions to alleviate the strains harming those you are charged to care for.

Think about it.

You have the power to prevent harm right here, right now. I pray you have the courage to do what is right, not what is self serving.

Please be courageous not cowardly. Swift leadership is required. Perfection is not.

Love,
Meg

Sent from my iPhone

CHRISTOPHER A. COONS
DELAWARE

WWW.COONS.SENATE.GOV

218 RUSSELL SENATE OFFICE BUILDING
WASHINGTON, DC 20510
(202) 224-5042

United States Senate

WASHINGTON, DC 20510-0805

APPROPRIATIONS COMMITTEE
MEMBER

ETHICS SELECT COMMITTEE
MEMBER

FOREIGN RELATIONS COMMITTEE
MEMBER

JUDICIARY COMMITTEE
MEMBER

SMALL BUSINESS AND
ENTREPRENEURSHIP COMMITTEE
MEMBER

August 8, 2019

Ms. Meghan M. Kelly
34012 Shawnee Dr
Blackwater Village
Dagsboro, DE 19939-4125

Dear Ms. Kelly,

Thank you for sharing your thoughts on potential impeachment proceedings against President Trump with me.

It probably comes as no surprise that I strongly oppose many of the policies of President Trump. I also continue to be concerned with the possibility that there may have been inappropriate connections between the Trump campaign and foreign governments. Moreover, the circumstances surrounding former FBI Director James Comey's firing and the ongoing special counsel investigation led by former FBI director Robert Mueller, which has already produced multiple criminal charges, demonstrate the need for continued inquiry into the Administration's actions.

To protect the Mueller investigation, I introduced the Special Counsel Independence and Integrity Act. The bill ensures that, if the President tries to protect himself by firing the Special Counsel, or if someone tries to fire the Special Counsel without good cause, a court, not the President, will have the final say. Ensuring that the Special Counsel cannot be removed improperly is critical to the integrity of the investigation.

However, I do not believe we have seen the type of direct and concrete evidence that would justify Congress moving forward with impeachment proceedings against the President. Furthermore, with a Republican-controlled Senate, impeachment won't move forward unless a majority of Republicans believe the President committed high crimes and misdemeanors. I think it is premature for us to discuss that possibility.

As a member of the Senate Judiciary Committee, I believe the investigations currently underway by the Senate Intelligence Committee, the Judiciary Committee, and, most importantly, the Mueller investigation need to continue to their logical conclusions. There is more and more evidence emerging as key individuals in both the Trump campaign and the Trump Administration are being interviewed and I think we should allow those investigations, unimpeded by the Administration, to finish before calling for impeachment.

WILMINGTON ADDRESS:
1105 N. MARKET STREET
SUITE 100
WILMINGTON, DE 19801
(302) 573-6345

Doing the right thing Matters

DOVER ADDRESS:
500 WEST LOOCKERMAN STREET
SUITE 450
DOVER, DE 19904
(302) 736-5601

Again, thank you for contacting me. It is an honor to represent Delaware in the United States Senate and I truly value hearing from Delawareans on issues of concern. My website, http://www.coons.senate.gov, can provide additional details about my work in the Senate, including legislation and state projects. I hope you will continue to keep me informed of the issues that matter to you.

Sincerely,



Christopher A. Coons
United States Senator

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>
Date: 5/11/2019
To: Peter.Schwartzkopf@state.de.us
Cc: Meghan Kelly <electmegkelly@icloud.com>,Steve.Smyk@state.de.us,ernesto.lopez@state.de.us,"Gerald.Hocker@state.de.us" <Gerald.Hocker@state.de.us>,Ron Gray <Ronald.Gray@state.de.us>,Darin McCann <darin.mccann@coastalpoint.com>,Glenn Rolphe <grolfe@newszap.com>
Subject: Save the schools proposal

Hi Pete,

I saw an upper Delaware School intends to lay off 63 teachers.

I propose the Governor place a State of emergency and place a moratorium on non federal money (federal funds trickled into the state's coffers must usually be used or the state loses it).

Place a moratorium on state funds to business incentives and business welfare (with the exception of potential contract clause violations of course) and use that money for schools until we get more stability on education funding?
It is an alternative solution.
I fear an increase without representation may push more folks into foreclosures. We are number two in foreclosures in the country
Please let me know your thoughts?

Pete these are unusual times. We need unusual answers. Please consider it. I contacted Stacie Burton in hopes she will have the ear of the governor.

Thank you for your kind consideration.
Thank you all copied above too.
If we can get the governor to declare an emergency you may escape the backlash of the businesses?

On an aside, I left a message with Mark Steele of Indian River High School concerning my proposal on Friday.

Thank you. Have a good night, and a happy Mother's Day weekend.

Best regards,
Meg
https://www.newarkpostonline.com/news/after-failed-referendum-christina-lays-off-teachers-in-first-round/article_4726a10c-a398-5ec6-987a-0270dd47dd3d.html?fbclid=IwAR0zRYUAbBoTUlh6TV-X6iu2tPgYkG4bCclm-bFLlEXAPVv9eih6hyAtHA0
Sent from my iPhone

Social security funding/ proposed fix to alleviate shortfalls

From: Meg Kelly (meghankellyesq@yahoo.com)

To: diaz.bonville@mail.house.gov

Cc: meghankellyesq@yahoo.com; matthewkosiorek@comcast.net

Date: Sunday, January 21, 2018, 09:10 PM EST

Congratulations Mr. Bonville,

I'm so grateful you're able to impact our legislators with respect, dignity, compassion and mercy.

I proposed a fix for the healthcare legislation that hasn't been considered to Rob Arlett and separately to each of our two Senators with no response to date.

In addition, I respectfully submit a proposal with regards to funding Medicare and social security via taxing the wealthy their fair share.

The wealthy do not pay any social security after a certain amount, the cap.
We can lift the cap so people making more than $128,400. Will be taxed for all income earned but only benefit up to the cap.

Social security was not created for a retirement plan. It was created as a safety net. So people would be able to live and eat. It was created to prevent people from becoming hungry, desperate and to prevent crime. It was created to benefit all society to provide income to those who may go without, not the wealthy, but those with disabilities, special needs, those with handicaps and the elderly who are unable to work.

In addition, I strongly urge congress to draft statutes to prevent the government agencies and the legislators from borrowing from social security? We can not fix the harm done by President Carter and our former Presidents, but legislators have the power of the pencil they can do something about it today!

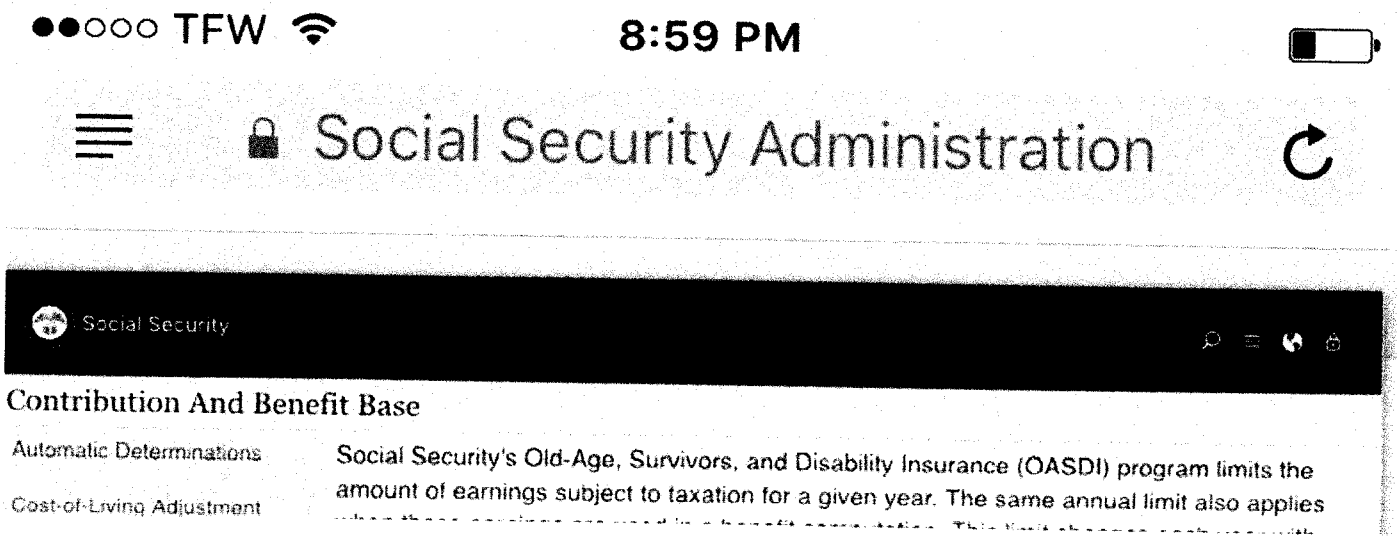
Thank you for your kind consideration!

For your convenience, below please find the social security administration's web site relating to the cap. Please feel free to contact me if you have questions.

https://www.ssa.gov/oact/cola/cbb.html

Thank you. Have a great night.

Best regards,
MegKelly, Esq
DE, PA, DC, US Supreme Court
Please excuse typos I'm on my iPhone



Tax data

Wage-indexed amounts

when those earnings are used in a benefit computation. This limit changes each year with changes in the national average wage index. We call this annual limit the contribution and benefit base. This amount is also commonly referred to as the taxable maximum. For earnings in 2018, this base is $128,400.

The OASDI tax rate for wages paid in 2018 is set by statute at 6.2 percent for employees and employers, each. Thus, an individual with wages equal to or larger than $128,400 would contribute $7,960.80 to the OASDI program in 2018, and his or her employer would contribute the same amount. The OASDI tax rate for self-employment income in 2018 is 12.4 percent.

For Medicare's Hospital Insurance (HI) program, the taxable maximum was the same as that for the OASDI program for 1966-1990. Separate HI taxable maximums of $125,000, $130,200, and $135,000 were applicable in 1991-93, respectively. After 1993, there has been no limitation on HI-taxable earnings. Tax rates under the HI program are 1.45 percent for employees and employers, each, and 2.90 percent for self-employed persons.

Contribution and benefit bases, 1937-2018

Year	Amount	Year	Amount	Year	Amount
1937-50	$3,000	1986	$42,000	2006	$94,200
1951-54	3,600	1987	43,800	2007	97,500
1955-58	4,200	1988	45,000	2008	102,000
1959-65	4,800	1989	48,000	2009	106,800
1966-67	6,600	1990	51,300	2010	106,800
1968-71	7,800	1991	53,400	2011	106,800
1972	9,000	1992	55,500	2012	110,100
1973	10,800	1993	57,600	2013	113,700
1974	13,200	1994	60,600	2014	117,000
1975	14,100	1995	61,200	2015	118,500
1976	15,300	1996	62,700	2016	118,500
1977	16,500	1997	65,400	2017	127,200
1978	17,700	1998	68,400	2018	128,400
1979	22,900	1999	72,600		
1980	25,900	2000	76,200		
1981	29,700	2001	80,400		
1982	32,400	2002	84,900		
1983	35,700	2003	87,000		
1984	37,800	2004	87,900		
1985	39,600	2005	90,000		

Note: Amounts for 1937-74 and for 1979-81 were set by statute; all other amounts were determined under automatic adjustment provisions of the Social Security Act.

Fwd: How to save the Beach/Oil drilling/Honorable Congresswomen Lisa Blunt Rochester

From: Meghan Kelly (electmegkelly@icloud.com)

To: meghankellyesq@yahoo.com

Date: Wednesday, September 2, 2020, 05:11 PM EDT

Sent from my iPhone

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>
Date: February 20, 2020 at 4:57:06 PM EST
To: jesse@deldems.org, "McDowell, Kenneth A (Elect_COE)" <kennetha.mcdowell@state.de.us>, erikjschramm@gmail.com, Meghan Kelly <electmegkelly@icloud.com>, megkellyesq@yahoo.com
Subject: Fwd: How to save the Beach/Oil drilling/Honorable Congresswomen Lisa Blunt Rochester

From: Meghan Kelly <electmegkelly@icloud.com>
Date: 4/25/2019
To: kyle.morse@mail.house.gov
Cc: Meghan Kelly <electmegkelly@icloud.com>,kimberly.jones@mail.house.gov
Subject: How to save the Beach/Oil drilling/Honorable Congresswomen Lisa Blunt Rochester

Hi Kyle,

Attached, please find HR 341, the Anti-drilling act that must be passed to stop oil drilling and related documents.

Please feel free to use my word version word for word for a press release.

Thank you. Have a great day.

Best regards,
Meg Kelly, Esq.
(302)537-1089

BILLS-116hr341ih.pdf
240.3kB

2019-07656.pdf
217.8kB

2019-07645.pdf
212.4kB

Executive Order 13795.pdf
178.4kB

341 Stopping oil drilling.docx
15kB

Fwd: Meg Kelly's Social Security Fix Fw: Re: Social security funding/ proposed fix to alleviate shortfalls

From: Meg Kelly (meghankellyesq@yahoo.com)

To: meghankellyesq@yahoo.com

Date: Monday, August 31, 2020, 02:37 PM EDT

Sent from my iPhone

Begin forwarded message:

From: Meg Kelly <meghankellyesq@yahoo.com>
Date: February 19, 2018 at 11:03:58 AM EST
To: <anne.allen139@gmail.com>, <jehovahrohi@aol.com>
Cc: '"Andrea Lefkanic' <ajlefkanic@verizon.net> bahrain@mchsi.com cgcopley@gmail.com 'Chris Bason' <c_bason@hotmail.com> 'Dee Lewis' <rondee@me.com> 'Emily Schwab' <emilyretired@gmail.com> 'Eric West' <ericewest@mchsi.com> ggoldman1@gmail.com 'Gordon Rickards' <gorickards@gmail.com> 'Jeanette Akhter' <jeakhter@gmail.com> 'John Lowery' <jclowery@hotmail.com> 'Josh Fried' <mensh47@msn.com> 'June Thompson' <thompson319@mchsi.com> 'Kate Brabite' <KateBailey0807@gmail.com> 'Kathleen Thompson' <kmt971@gmail.com> 'Keith Carter' <Box4201@gmail.com> lennysav@aol.com 'Meghan Kelly' <meghankellyesq@yahoo.com> 'Mike and Tish Galu' <patriciagalu@gmail.com> 'Mike Buso' <buso.mike@gmail.com> 'Mike Smith' <oceancitymike@msn.com> 'Mohammad Akhter' <mohammad.akhter2@gmail.com> 'nancy hickman' <whitesneck@gmail.com> 'Pamela White' <pamelasgarden7@hotmail.com> 'Pat Guilday' <pgpat52@gmail.com> 'Paul Schwab' <paulmschwab@gmail.com> 'Ron Lewis' <rondee1@ptd.net> 'Russ Melrath' <rusty55@mchsi.com> 'Sander Raymond' <raymondjsander@gmail.com> 'Sheryl Swed' <sherylswed@gmail.com> 'Skipp Robinson' <skipfamrob@gmail.com> 'Susan Fried' <srogersf624@gmail.com> 'Tom Shamp' <cherokea28@gmail.com> 'Valerie Faden'" <vfaden@gmail.com>
Subject: Meg Kelly's Social Security Fix Fw: Re: Social security funding/ proposed fix to alleviate shortfalls
Reply-To: Meg Kelly <meghankellyesq@yahoo.com>

Good morning,

Below, please find my proposal submitted to all of our federal legislators. Please note Mr. Diaz Bonville works in Representative Lisa Blunt Rochester's Georgetown office.

He's a go to person to seek federal funds for state issues.

I have the highest regards for Mr. Bonville. He is an excellent role model to his former students at GW Carver. He is someone who will assist the Democrats in moving mountains.

I'll also send you my thoughts on health care. Please note, I have studied the history of medicine at the University of Delaware, and studied health care financing in law school.

Thank you for your kind consideration.

Have a great day!

Very truly,
Meg Kelly, Esq

PS Your words are more powerful than weapons.

Words form Ideas
Ideas are accepted or rejected forming beliefs
People cling to their beliefs more tightly than money

Use your words to build up not to destroy
to love not to hate
in faith not in fear

Your most powerful asset is your words, speak.

From:

Meg Kelly <meghankellyesq@yahoo.com>

Date: January 21, 2018 at 9:09:58 PM

EST

To: Diaz Bonvillw <diaz.bonville@mail.house.gov>

Cc: Meg Kelly <meghankellyesq@yahoo.com>,

Matty R Kosiorek <matthewkosiorek@comcast.net>

Subject: Social security funding/

proposed fix to alleviate shortfalls

Congratulations Mr.

Bonville,

I'm so

grateful you're able to impact our legislators with

respect, dignity, compassion and

mercy.

I proposed a

fix for the healthcare legislation that hasn't been

considered to Rob Arlett and separately to each of our two

Senators with no response to date.

In addition, I respectfully submit a proposal with

regards to funding Medicare and social security via taxing

the wealthy their fair share.

The wealthy do not pay any social security after a

certain amount, the cap.We

can lift the cap so people making more than $128,400. Will be taxed for all income earned but only benefit up to the cap.

Social security was not created for a retirement plan. It was created as a safety net. So people would be able to live and eat. It was created to prevent people from becoming hungry, desperate and to prevent crime. It was created to benefit all society to provide income to those who may go without, not the wealthy, but those with disabilities, special needs, those with handicaps and the elderly who are unable to work.

In addition, I strongly urge congress to draft statutes to prevent the government agencies and the legislators from borrowing from social security? We can not fix the harm done by President Carter and our former Presidents, but legislators have the power of the pencil they can do something about it today!

Thank you for your kind consideration!

For your convenience, below please find the social security administration's web site relating to the cap. Please feel free to contact me if you have questions.

https://www.ssa.gov/oact/cola/cbb.html

Thank you. Have a great night.

Best regards, MegKelly, EsqDE, PA, DC, US Supreme CourtPlease excuse typos I'm on my iPhone

<IMG_9686.PNG>

Fwd: Save the schools proposal

From: Meg Kelly (meghankellyesq@yahoo.com)

To: fokm16@gmail.com

Cc: meghankellyesq@yahoo.com

Date: Sunday, May 19, 2019, 06:44 PM EDT

Hi Kathy,
Below, please find my suggestion regarding saving the schools. Steve Smyk is on board.
We will have a federal shortfall 2025 that will defend states of federal money down the line if congress and the next administration does not prepare now.

Thank you for all that you do.

Night,
Meg

Sent from my iPhone

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>
Date: May 14, 2019 at 10:21:40 AM EDT
To: geri.donahue@doe.k12.de.us
Cc: Meghan Kelly <electmegkelly@icloud.com>
Subject: Fwd: Save the schools proposal

Hi Mrs. Donahue,

Thank you for taking time to talk with me. Please see below for my idea to save the schools by placing a moratorium on business incentives and using such money to help the schools long term plan is set in place via a state of emergency.

To confirm there are two exceptions for a moratorium on business incentives.
1. Contracts already created with businesses to avoid law suits under the Contract Clause of the US Constitution which is only applicable to the states and not the federal government
2. money given to the states by the federal government that must be used in a certain manner.

Thank you for your kind consideration. On a side note, my father the legendary teacher and coach, Pat Kelly thinks Dr. Bunting is a neat person . He likes her. Please let her know.

Also attached, per our conversation, please find a plan to gain money in the state's coffers in an unrelated area of the law.

Thank you. Please feel free to give me a call if you like. Have a great day. :)
Best regards,
Meg Kelly, Esq.
Licensed DE, DC, PA, US Supreme Court
(302)537-1089

Letters

Continued from page A15

in criminal prosecution. While there will always be a need for fraud investigation, I will advocate for fraud prevention and actively participate in training that supports good fiscal operations for the various entities that collect and receive state funds.

My goals are to ensure timely completion of audit mandates; to support the elimination of significant noncompliance, fraud and waste based on clearly defined criteria; to perform follow-up of prior unresolved findings and recommendations; and to provide program evaluation and process recommendations that support government transparency and good government.

On a personal note, I live in Dover with my husband, Jerry, who is retired from 20 years of active-duty service in the Air Force. He currently serves as the union president for the American Federation of Government Employees, Local 1709, at Dover Air Force Base. We have three children and four grandchildren.

In the end, no amount of technology, contracting or delegating that can replace experience, leadership and management specific to the field of state auditing and investigating. As you research the candidates, please consider the need for state auditing qualifications and experience prior to the upcoming elections.

I humbly ask for your vote in the Thursday, Sept. 6, primary.

Kathleen Davies
Candidate for Delaware Auditor of Accounts

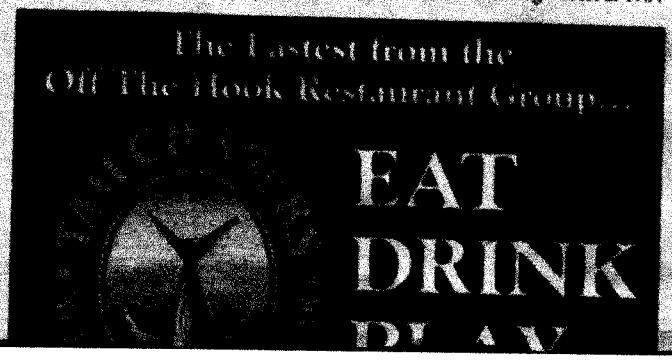
Reader offers idea to lessen strife

Editor:

I would like to share with you a "quick fix" to the problem of the political divide engulfing this country, if not the world...

Rewrite the Civil Rights Act of 1964 with the addition of two words: "prohibits discrimination because of race, color, sex, religion, political view or national origin."

Henry R Hensel
Ocean View



Keeley responds to previous letters

Editor:

I am writing in response to a number of letters in the June 29 Coastal Point.

First, Lloyd Elling's seemingly gross misinterpretations of the Second Amendment; the NRA and President Trump's actions are viewed as preposterous positions by many of us that support our rights as citizens.

Second, Valerie Reeves' denounces President Trump's policy on the enforcement of our laws at the border. Even though he's following the same tough policies as President Obama. The very same tough policies that were overlooked by Obama's fawning media. She also mentions "due process," which I believe requires citizenship. Detention of people entering our country illegally, with or without children, is certainly necessary to protect our borders and, in the long run, our country.

Third, Diane Meyer asks for term limits while noting the immigration quagmire currently strangling our Congress. A solution to the immigration quagmire was one of President Trump's main campaign promises, but he has problems with the professional politicians on both sides of the aisle with issue.

Unfortunately, the quagmire is n limited to immigration. She has a w good point especially when she men tions our own Sen. Tom Carper, wh appears to be the definition of a pro sional politician. Term limits would tainly be a great step toward getting things done in Washington, especia since our representatives in both par currently seem to spend most of the efforts at getting reelected!

Fourth and last, Henry R. Hense states that he believes that our politi strife will end. I, however, do not see that happening any time soon! We d have the choice between parties whe simply put, one wants smaller govern ment, verses one that believes bigger government is the answer. Our founti ing fathers feared this type situation, and it seems they were correct!

I do agree with Mr. Hensel's sugg tion that we turn off the 24/7 barrag so-called news thrown at us by the radio, TV and newspapers. But that i easier said than done, and then where would we be?

Thomas M. Kaste
Ocean

Candidate discusses title companies' issu

Editor:

My name is Meghan Kelly. I am a

See LETTERS page

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Letters

Continued from page A16

attorney running for the House of Representatives in the 38th District, which includes Frankford, Selbyville, Ocean View, Bethany Beach and parts of Dagsboro.

One of the reasons why I am running is, two years ago, I found a problem that no one cares to fix. I care.

I found a lot of money not getting taxed by the State of Delaware relating to out-of-state real estate title insurance companies. I contacted various people and entities in an attempt to resolve the issue; however, to date, no one has addressed the problem. So, I am stepping up to confront the issue and to correct the problem.

It appears out-of-state title companies have been practicing Delaware law without a license for more than a decade. I talked with other real estate attorneys and discovered this has been a common practice for many years.

The problem arises, real estate attorneys gain work from those same title companies. So, they fear they will lose profit should they confront this misunderstanding.

The out-of-state title companies do not pay income tax in Delaware. So, the State of Delaware is not receiving income tax for this work. In addition, this has caused errors in the chain of title for deeds. So, good title may not be transferred in real estate transactions if errors are not fixed. So, I sought to correct this by discussing this with the real estate section of the Bar.

Justice Holland gave me a call and offered to draft rules, but he retired.

In addition, [state Sen. Gerald] Hocker suggested we fine the title companies for exceeding the scope of their license. I think Mr. Hocker's idea is an excellent one.

I contacted legislators concerning this, but to date this problem has not been alleviated.

Thus, I strongly urge the Delaware Assembly to draft laws to clearly address this problem by giving notice to those out-of-state title companies with a license to sell title insurance the scope of the activities they may receive payment for in the State of Delaware. Should they exceed the scope, unless authorized permitted by law, fine them a specified amount of money.

The clarification will assist title companies in performing their work in accordance with Delaware Supreme Court case law. In addition, this correction will prevent the legislators from stepping on the Delaware Supreme Court's toes by discussing the unauthorized practice of law.

Thank you for your kind consideration. As a future legislator, I hope to participate in this correction, but I am running not only to win — I am running to make a positive difference in the community I grew up in and love.

Thank you for supporting me i serving you.

Meghan
Da

Steele weighs in on previous letters

Editor:

This letter is to answer three lett published June 29.

First, to Mr. Ewing: Your comm about President Trump and the cry little girl on the cover of Time mag is flat-out wrong. That little girl wa crying because she was lost for a fe minutes from her family and her fa found her just after that photo was taken. She was immediately reunite with her mother and father. Let's fi when will Time magazine or you c state the facts correctly?

Secondly, what does the Second Amendment have anything to do w illegal immigration? Maybe you are confused and do not know what th Second Amendment is about, basic the right to bear arms. And that is the Americans, who live along our southern border, are doing to prote themselves from armed gang mem from Mexico plus the drug and hur smugglers crossing the border.

You ask the question, "Whose si will you defend?" My answer: Alwa the Constitution! How about you?

Second, to Mr. Hansel: Thank y

See LETTERS pag

Geri@tate.de.us,debra.heffernan@state.de.us,Ray.Seigfried@state.de.us,Quinton.Johnson@state.de.us,Kevin.Hensley@state.de.us,Sean.Matthews@state.de.us,jeff.spiegelman@s .us,Krista.Griffith@state.de.us,John.L.Mitchell@state.de.us,Peter.Schwartzkopf@state.de.us,Valerie.Longhurst@state.de.us,FranklinD.Cooke@state.de.us,Nnamdi.Chukwuocha@sta s,Melissa.MinorBrown@state.de.us,David.Bentz@state.de.us,kimberly.williams@state.de.us,Steve.Smyk@state.de.us,Michael.Ramone@state.de.us,Michael.F.Smith@state.de.us,P mbach@state.de.us,Edward.Osienski@state.de.us,John.Kowalko@state.de.us,John.Viola@state.de.us,Earl.Jaques@state.de.us,William.Carson@state.de.us,William.Bush@state.d annon.Morris@state.de.us,Sean.Lynn@state.de.us,andria.bennett@state.de.us,charles.postles@state.de.us,Lyndon.Yearick@state.de.us,Jesse.Vanderwende@state.de.us,Bryan.St tate.de.us,Ruth.BriggsKing@state.de.us,Ronald.Gray@state.de.us,Daniel.Short@state.de.us,Timothy.Dukes@state.de.us,R.Collins@state.de.us
Cc:
jonathan.starkey@delaware.gov,jessica.borky@delaware.goc,emily.david@delaware.gov,darin.mccann@coastalpoint.com,grolfe@newszap.com,ltgov@delaware.gov,dean.hall274@ om,ashley.brown@irsd.k12.de.us,bradley.layfield@irsd.k12.de.us,mark.steele@irsd.k12.de.us,cbarrish@whyy.org
Subject: Fwd: Save the schools proposal

Good evening,

Please see my proposal below to save our public schools. I reached out to Mark Steele twice at Indian River School District, and left a message with the Secretary in the Department c Education today.

Thank you for your kind consideration of this important matter.

Very truly,
Meg Kelly, Esq.
Licensed DE, DC, PA, Us Supreme Court

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>
Date: 5/11/2019
To: Peter.Schwartzkopf@state.de.us
Cc: Meghan Kelly <electmegkelly@icloud.com>,Steve.Smyk@state.de.us,ernesto.lopez@state.de.us,"Gerald.Hocker@state.de.us" <Gerald.Hocker@state.de.us>,Ron Gray <Ronald.Gray@state.de.us>,Darin McCann <darin.mccann@coastalpoint.com>,Glenn Rolphe <grolfe@newszap.com>
Subject: Save the schools proposal

Hi Pete,

I saw an upper Delaware School intends to lay off 63 teachers.

I propose the Governor place a State of emergency and place a moratorium on non federal money (federal funds trickled into the state's coffers must usually be used or the state loses it).

Place a moratorium on state funds to business incentives and business welfare (with the exception of potential contract clause violations of course) and use that money for schools until we get more stability on education funding?
It is an alternative solution.
I fear an increase without representation may push more folks into foreclosures. We are number two in foreclosures in the country
Please let me know your thoughts?

Pete these are unusual times. We need unusual answers. Please consider it. I contacted Stacie Burton in hopes she will have the ear of the governor.

Thank you for your kind consideration.
Thank you all copied above too.
If we can get the governor to declare an emergency you may escape the backlash of the businesses?

On an aside, I left a message with Mark Steele of Indian River High School concerning my proposal on Friday.

Thank you. Have a good night, and a happy Mother's Day weekend.

Best regards,
Meg
https://www.newarkpostonline.com/news/after-failed-referendum-christina-lays-off-teachers-in-first-round/article_4726a10c-a398-5ec6-987a-0270dd47dd3d.html?fbclid=IwAR0zRYUAbBoTUfh6TV-X6iu2tPgYkG4bCclm-bFLIEXAPVv9ejh6hyAtHA0
Sent from my iPhone

District Court Exhibit 5

Re: [DSBA] FREE Webinar on Legal Malpractice Insurance (no CLE credits) - March 11, 2021 10 am via Zoom

From: meghankellyesq@yahoo.com

To: MVavala@dsba.org

Cc: meghankellyesq@yahoo.com

Date: Thursday, March 11, 2021, 02:49 PM EST

Hi Mark,

Thank you for the CLE.

I had a hard time hearing the CLE. It kept going in and out, but I attended it. Maybe I should just get a half credit for technical difficulties.

I disagree with what the speakers' sold us.

I believe it is wrong to create the problem by allowing back doors in our computers and devices to be open for hacks. That is where our focus should be, preventing the harm by changing the laws by law suits or legislation.

One of the speakers basically encouraged the business of hacking by saying attorneys pay the hacker' fee and get their files back. Just pay the wrong doer and everything will be returned. The return of files and marketing of return in exchange for data back is good business for the criminals.

An entire industry of antivirus, malware and nortan is also created. They benefit from hacks, and may potentially allow them or encourage threats once their service expires. So, they get more money, and stay in business not fully protecting customers...

Another industry is created for a preventable problem, the insurance companies too. They gain more business with more hacking threats too.

Lawyers, a third industry, (4th if you include the criminal business based on hacking) also gain business.

Victims are twice or potentially thrice wronged to serve the love of money.

Victims are further harmed since their speech may no longer be free but censored, bought and even distorted.

Health records may be distorted to harm patients health to save money or to gain money too.

Thank you for allowing me to share my concerns, even though no one else seems to ever agree with me. I need to stand up for what is right in little things and in big things, even if I stand alone.

The little things are not so little.

Sorry for the typos and have a great day.

Very truly,
Meg

On Mar 3, 2021 3:36 PM, Mark Vavala <MVavala@dsba.org> wrote:

Recent comments not relevant to drafting laws more related to matters of the heart in Legal Education course

Thank you Kelly/Meg Kelly/Feb 11 CLE

From: Meg Kelly (meghankellyesq@yahoo.com)
To: Kelly.Ensslin@delaware.gov
Cc: meghankellyesq@yahoo.com
Date: Thursday, February 11, 2021, 02:29 PM EST

Hi Kelly,

Thank you for including me in the CLE. I was really impressed with Mark Hudson's compassion, respect and love for the dignity of others.

I do not do family law or foster care (preventing the desperate conditions leading to the need for foster care is better than cure. Foster care is not like adoption but taking kids away from their parents for neglect usually due to poverty, which is sooooo sad). Yet, I am impressed with the love and compassion of my peers.

In Sussex many people reflect this us verses them mentality. There is ugly racism, sexism and nationalism stemmed in this identification of self based on relationships. Identification should be based on each individual's inherent value. Individuals are uniquely loved and respected without association.

I do not think the mapped brain, identification map reduces prejudice. Instead it increases it. We should strive to respect every individual not based on association with others, but based on the fact they are an individual to be respected uniquely as every person should be.

The terms Miss, Mrs. and Ms. are similarly sexist, demeaning women by basing her name on marriage or not, whereas men all receive Mr. There is a rape crisis and a disgusting, ugly pride crisis men display by demeaning women down here, making jokes that are not funny.

I wish we came up with universal terms for people in general. So, they are not sized up or down based on prejudice or association. I think "they them" doesn't humanize people adequately. I wish we eliminated sir names. In my religion, Christianity, Jesus teaches us not to use sir names, like teacher, professor, but teaches us to respect other people unconditionally as equals in the eyes of God. See Matthew 23:9. Also see Galatians 3:28 "There is neither Jew nor Gentile, neither slave nor free, nor is there male and female,...."

There has been back lash on pronouns. I see lawyers like Ron Ponquin (spelling) nit picking on law makers use pronouns in their email boxes.. I do not think the use of pronouns is helpful, but increases the great prejudice and persecution we have in Sussex. Things are not ok down here at all. Folks still speak of civil war and use of violence making jokes that are not funny down here based on sex, religion, race and place of origin...

Thank you for the educational course. On an aside attached please find my thoughts on the US Supreme Court foster case. I think the Supreme Court ~~makes~~ misbehaves in its thinking sometimes too.

MLC

Have a great day.

Very truly,
Meg Kelly
Bar 4968
1 hour 45 minutes

On Thursday, February 11, 2021, 12:13:26 PM EST, Ensslin, Kelly (Courts) <kelly.ensslin@delaware.gov> wrote:

Join Zoom Meeting
https://us02web.zoom.us/j/88936092186?pwd=eXFhcEhRWExqK2FjQlhvNkJmVWtPUT09

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Thursday, February 11, 2021 12:01 PM
To: Ensslin, Kelly (Courts) <Kelly.Ensslin@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Re: OCA Education training- Zoom link for today

Good morning Kelly,

I am having a hard time logging onto the CLE scheduled for today, 12-2 PM, in the office of Child Advocate.

Could you please help us.

Thank you,

Meg Kelly

Bar 4968

On Thursday, November 12, 2020, 11:07:11 AM EST, Ensslin, Kelly (Courts) <kelly.ensslin@delaware.gov> wrote:

All:

Some people have indicated they did not get the link for training today so, to be on safe side, I am including it again below:

https://zoom.us/j/96885877591?pwd=Q1NUcG5TMXNZcCtoMFJSaTI1QkQ5Zz09

See you soon!

Kelly

Kelly Ensslin, MSW, Esq., CWLS

Chief of Legal Services

Office of the Child Advocate

900 King Street, Suite 350

Wilmington, DE 19801

(302)255-1728



smooth as butter.docx
14.3kB

Meg Kelly attended 4968/side notes Oct 8 CLE

From: Meg Kelly (meghankellyesq@yahoo.com)

To: kelly.ensslin@delaware.gov

Cc: meghankellyesq@yahoo.com

Date: Thursday, October 8, 2020, 12:24 PM EDT

Hi Kelly,

Thank you for allowing me to attend, despite the fact I am not volunteering due to religious reasons.

My name is Meghan Kelly. My bar ID is 4968.

I had concerns about the little ones expressing desperation and untruths expressing feelings of being "unseen, unheard, (or)unwanted" and "helpless, defenseless, and" (I can't read my handwriting for the rest) maybe "desperate."

I like to teach people they are loved period, and to love via respecting others period, unearned. I like to teach people they are priceless. No person is worthless. I think the BF Skinner approach which most teachers learn under has planted seeds of untruth in little ones. He taught people live for self, conditionally care for reward and avoidance of harm (giving charity in violation of Jesus teachings on true charity in Matthew 6 for pride (a sin) and praise of man like economist Adam Smith too, not out of unconditional love), with no true love love in them, because love is unconditional.

I believe kids learn wrong and give into despair. Instilling hope is important, and I think creating opportunities of success (opportunity for real hope not false hope which is evil) not stress to reduce poverty would alleviate the temptations to sin at home.

Thanks for letting me vent. I prefer to encourage rather than to increase desperate conditions.

I understand appealing to lawyers to become heroes, the sin of pride, is a tempting way to persuade them to help the helpless (appealing to sin). I just think it is the wrong way. It is better to give victims of sin, power to participate, which you did by encouraging lawyers to provide a pen and writing pad for little ones to communicate with their lawyers. I liked that encouragement of active engagement in their own lives. So the lawyer and the little ones together can seek to save the day, with no person given credit for the whole, each playing an important part. I am a bit religious. So, the teachings of one body many parts I believe teach us humility and appreciation for others, not resentment or exploitation. I extend that appreciation and respect to all people as valuable and important regardless of race, religion, place of origin, wealth or poverty.

Thank you.

Love,
Meg

PS No need to respond. Thanks for considering my thoughts.

> On Thursday, October 8, 2020, 09:56:36 AM EDT, Ensslin, Kelly (Courts) <kelly.ensslin@delaware.gov> wrote:
>
> I understand the link sent yesterday may not work. Please use this for training today!
>
> Kelly Ensslin is inviting you to a scheduled Zoom meeting.
>
> Join Zoom Meeting
> https://zoom.us/j/98548595971?pwd=aHVmYXdWLzN6VDNCbXRZL0QxcEFEQT09

Meeting ID: 985 4859 5971
Passcode: 748229
One tap mobile
+16465588656,,98548595971#,,,,,,0#,,748229# US (New York)
+13017158592,,98548595971#,,,,,,0#,,748229# US (Germantown)

Dial by your location
+1 646 558 8656 US (New York)
+1 301 715 8592 US (Germantown)
+1 312 626 6799 US (Chicago)
+1 669 900 9128 US (San Jose)
+1 253 215 8782 US (Tacoma)
+1 346 248 7799 US (Houston)
Meeting ID: 985 4859 5971
Passcode: 748229
Find your local number: https://zoom.us/u/abkk5JNko

District Court Exhibit 6

8 predictions for the world in 2030



Facing the future

12 Nov 2016

Ceri Parker
Commissioning Editor, Agenda, World Economic Forum

For more information, watch sessions on the Global Economic Outlook, the Global Science Outlook and The Future of Consumption from our Annual Meeting 2017.

As Brexit and Donald Trump's victory show, predicting even the immediate future is no easy feat. When it comes to what our world will look like in the medium-term – how we will organise our cities, where we will get our power from, what we will eat, what it will mean to be a refugee – it gets even trickier. But imagining the societies of tomorrow can give us a fresh perspective on the challenges and opportunities of today.

We asked experts from our Global Future Councils for their take on the world in 2030, and these are the results, from the death of shopping to the resurgence of the nation state.

1. All products will have become services. "I don't own anything. I don't own a car. I don't

Case 1:21-cv-01490-CFC Document 261-8 Filed 11/22/23 Page 3 of 20 PageID #: 30751

own a house. I don't own any appliances or any clothes," writes Danish MP Ida Auken. Shopping is a distant memory in the city of 2030, whose inhabitants have cracked clean energy and borrow what they need on demand. It sounds utopian, until she mentions that her every move is tracked and outside the city live swathes of discontents, the ultimate depiction of a society split in two.

2. There is a global price on carbon. China took the lead in 2017 with a market for trading the right to emit a tonne of CO2, setting the world on a path towards a single carbon price and a powerful incentive to ditch fossil fuels, predicts Jane Burston, Head of Climate and Environment at the UK's National Physical Laboratory. Europe, meanwhile, found itself at the centre of the trade in cheap, efficient solar panels, as prices for renewables fell sharply.

3. US dominance is over. We have a handful of global powers. Nation states will have staged a comeback, writes Robert Muggah, Research Director at the Igarapé Institute. Instead of a single force, a handful of countries – the U.S., Russia, China, Germany, India and Japan chief among them – show semi-imperial tendencies. However, at the same time, the role of the state is threatened by trends including the rise of cities and the spread of online identities,

Image: REUTERS/Francois Lenoir

4. Farewell hospital, hello home-spital. Technology will have further disrupted disease, writes Melanie Walker, a medical doctor and World Bank advisor. The hospital as we know it will be on its way out, with fewer accidents thanks to self-driving cars and great strides in preventive and personalised medicine. Scalpels and organ donors are out, tiny robotic tubes and bio-printed organs are in.

Could we see 3D printed human organs? BBC Click



5. **We are eating much less meat.** Rather like our grandparents, we will treat meat as a treat rather than a staple, writes Tim Benton, Professor of Population Ecology at the University of Leeds, UK. It won't be big agriculture or little artisan producers that win, but rather a combination of the two, with convenience food redesigned to be healthier and less harmful to the environment.



6. Today's Syrian refugees, 2030's CEOs. Highly educated Syrian refugees will have come of age by 2030, making the case for the economic integration of those who have been forced to flee conflict. The world needs to be better prepared for populations on the move, writes Lorna Solis, Founder and CEO of the NGO Blue Rose Compass, as climate change will have displaced 1 billion people.



Image: REUTERS/Muhammad Hamed

7. The values that built the West will have been tested to breaking point. We forget the checks and balances that bolster our democracies at our peril, writes Kenneth Roth, Executive Director of Human Rights Watch.

WORLD ECONOMIC FORUM

"Unfettered majoritarianism, and the attacks on our system of checks and balances, is perhaps the greatest danger today to the future of Western democracies."

KENNETH ROTH
Executive Director of Human Rights Watch

8. **"By the 2030s, we'll be ready to move humans toward the Red Planet."** What's more, once we get there, we'll probably discover evidence of alien life, writes Ellen Stofan, Chief Scientist at NASA. Big science will help us to answer big questions about life on earth, as well as opening up practical applications for space technology.



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America's dominance is over. By 2030, we'll have a handful of global powers



The sun is setting on the power structures of the twentieth century

Image: REUTERS/Gary Hershorn/Files

11 Nov 2016

Robert Muggah
Co-founder, SecDev Group and Co-founder Igarape Institute

This article is part of the Annual Meeting of the Global Future Councils

Watch the Outlook for the United States session here and a Conversation with John Kerry: Diplomacy in an Era of Disruption here.

The world's political landscape in 2030 will look considerably different to the present one. Nation states will remain the central players. There will be no single hegemonic force but instead a handful of countries – the U.S., Russia, China, Germany, India and Japan chief among them – exhibiting semi-imperial tendencies. Power will be more widely distributed

across non-state networks, including regressive ones. And vast conurbations of mega-cities and their peripheries will exert ever greater influence. The post-war order that held since the middle of the twentieth century is coming unstuck. Expect uncertainty and instability ahead.

Nation states are making a comeback. The largest ones are busily expanding their global reach even as they shore-up their territorial and digital borders. As the onslaught of reactionary politics around the world amply shows, there are no guarantees that these vast territorial dominions and their satellites will become more liberal or democratic. Instead, relentless climate change, migration, terrorism, inequality and rapid technological change are going to ratchet up anxiety, insecurity and, as is already painfully apparent, populism and authoritarianism. While showing cracks, the four-century reign of the nation state will endure for some decades more.

It was not supposed to be this way. During the 1990s, scholars forecasted the decline and demise of the nation state. Globalization was expected to hasten their irrelevance. With the apparent triumph of liberal democracy, spread of free-market capitalism, and promise of minimal state interference, Francis Fukayama famously predicted the end of history and, by extension, the fading away of anachronistic nation states. A similar claim was made a century earlier: Friedreich Engels predicted the "withering away of the state" in the wake of socialism.

The end of The End of History

Rumors of the nation state's death were greatly exaggerated. The end of history has not arrived and liberal democracy is not on the ascendant. Misha Glenny contends that "Fukayama and others under-estimated Western hubris and the greed of financial capitalism which contributed in 2008 to one of the most serious political and economic crises since the Great Depression. These shocks – alongside a vicious backlash against globalization – enabled alternative models of governance to reassert themselves ... with China and Russia but also other states in Europe ... and the consolidation of illiberal nation states."

Far from experiencing a decline in hard power, larger nation states are steadily shoring-up their military capabilities. The top ten spenders in 2015 included the U.S., China, Russia, India, Japan and Germany. Some of these countries - along with major purchasers such as

Israel and Saudi Arabia - are clearly preparing for confrontations in the coming decade. They are not alone. Global defense expenditures have increased steadily since the late 1990s, topping $1.6 trillion last year. These trends are set to continue into the next decade.

These same nation states will continue dominating economically. Countries such as the U.S., China, Japan, Germany, India, and to a lesser extent Russia registered among the largest GDPs in 2015. If adjusted for purchasing power parity, China outstrips the U.S. and Russia also slides up the rankings. These countries are also likely to remain the top performers in 2030, alongside Brazil (if it gets its house in order), Canada, France, Italy, Mexico, Indonesia and others. Barring a spectacular collapse of global markets or catastrophic armed conflict (both of which are now more plausible in the wake of Donald Trump´s victory), they will continue laying the rails of international affairs.

Nation states are clearly not the only forms of political and economic organization. They are already ceding sovereignty to alternate configurations of governance, power and influence. The fourth industrial revolution is hastening this shift. As Anne-Marie Slaughter explains, "nation states are the world of the chessboard, of traditional geopolitics ... [but the] web is the world of business, civic, and criminal networks that overlay and complicate the games statesmen play". In her view, stateswomen must learn webcraft in order to mobilize and deploy non-governmental power just as statecraft does with government power.

Vast metropolitan regions are increasingly rivaling nation states in political and economic clout. Take the case of Mexico City which fields roughly 100,000 police - a larger force than the national law enforcement departments of 115 countries. Or consider New York's annual budget of $82 billion, bigger than the national budgets of 160 countries. Meanwhile the populations of mega-cities like Seoul and Tokyo are larger than those of most nation states. Many cities are rapidly forging cross-border partnerships and integrating transportation, telecommunications and energy-related infrastructure. And citi-zens are expressing novel forms of belonging - or city-ness - spanning the digital and physical realms and challenging traditional notions of national identity.

Four threats to the nation state

Most nation states will endure in the coming decades. There are, however, a number of ways in which they will come under strain.

First, the redistribution of power among a handful of nation states is profoundly disrupting the global order. Established twentieth century powers such as the U.S. and EU are ceding importance and influence to faster-growing China and India. Old alliances forged after the Second World War are giving way to new regional coalitions across Latin America, Asia and Africa. While these reconfigurations reflect regional political, economic and demographic shifts, they also increase the risk of volatility, including war. As Parag Khana explains, "large, continental-sized nation states will continue seeking to control supply chains in energy and technology while smaller states will need to band together or suffer the consequences of irrelevance".

Second, the de-concentration of power away from nation states is giving rise to parallel layers of governance. Indeed, nation states themselves are busily establishing legal and physical enclaves to contract out core functions to private entities. There are already more than 4,000 registered special economic zones – ranging from free trade and export processing zones to free ports and innovation parks – spread out around the world. Many of the ones established in China, Malaysia, South Korea and the United Arab Emirates are considered to be relatively successful while others – especially zones rapidly set up in Africa and South Asia – have fared more poorly. These para-states deliberately fuse public and private interests and test the purchase of state sovereignty.

Third, nation states and para-states will come under pressure from decentralized networks of non-state actors and coalitions, many of them enabled by information communications technologies. Large multinational companies are already heavily involved in shaping national policy. So are constellations of non-governmental organizations, unions, faith-based groups and others. Working constructively with, rather than against, these digitally empowered networks will be one of the key tests for nation states. The spread of new technologies offers up new ways of imagining deliberative democracy - but also tearing it down. Such is the Janus face of the quantified society: it offers extraordinary benefits and opportunities, but also risks ranging from the evisceration of low-skill jobs to terrifying new forms of warfare, terrorism and criminality.

Fourth, nation states are seeing power devolved to cities. The relentless pace of urbanization is partly to blame. The number of large and medium-sized cities has increased tenfold since the 1950s. Today there are 29 megacities with 10 million residents or more. And there are another 163 cities with more than 3 million people and at least 538 with at last 1 million inhabitants. Cities are no longer just norm-takers, they are norm-makers. A new generation of mayors and literally hundreds of city coalitions is emerging, busily ensuring that our urban future is embedded in international relations. Not surprisingly, the geography of power is also shifting with cities increasingly competing with each other and nation states, including over water, food and energy.

Saskia Sassen has shown convincingly how the rise of global cities is generated by the growing importance of intermediation. In The Global City she explains how the deregulation and privatization of national economies was a key to the globalization of cities during the 1980s and 1990s. This in turn sharply raised the demand for highly specialized talent and

contributed to hyper-gentrification, as residents of London, New York, Shanghai or Hong Kong know all too well. All of these developments have fundamentally altered the texture of urban living, raising questions of their sustainability.

There are myriad challenges facing nation states in the coming decade and a half. Having survived 368 years, they have proven to be remarkably resilient modes of political, social and bureaucratic organization. But given the scale and severity of global challenges - and the paralysis of our national and multilateral institutions - there are dangers that nation states are becoming anachronistic and hostile to humanity's collective survival.

The potential for the world's most powerful nation states to be held hostage to nativist and protectionist interests are more obvious than ever. On the other hand, cities and civil society networks constitute powerful political and economic nodes of power and influence. The question is whether they will be any better at channeling collective action to address tomorrow´s threats.

** With thanks for input from Anne-Marie Slaughter, Saskia Sassen, Misha Glenny, and Parag Khana.*

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Written by

Robert Muggah, Co-founder, SecDev Group and Co-founder Igarape Institute

The views expressed in this article are those of the author alone and not the World Economic Forum.

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Healthcare in 2030: goodbye hospital, hello home-spital



Image: REUTERS/Vincent Kessler

11 Nov 2016

Melanie Walker
Senior Adviser to the President, World Bank

This article is part of the Annual Meeting of the Global Future Councils

Nearly 20 years ago, when I graduated from medical school, the world of healthcare was dominated by breakthroughs in the field of biology. But, that is changing quickly because biology is being eaten by robotics and genetics as we evolve deeper into the networked age. What does this shift mean for doctors, patients and even hospitals? As the co-chair of the World Economic Forum's Future Council on neuro-technology and brain science, I was asked to reflect on my experience in this domain.

By the way, you know you are getting old(er) when you are asked to reflect.

Case 1:21-cv-01490-CFC Document 261-8 Filed 11/22/23 Page 16 of 20 PageID #: 30764

Back when I started out in the 1990s, the discovery of protease inhibitors - a class of antiviral drugs - helped change the clinical course for HIV positive patients, while vaccines for conditions like hepatitis C and Lyme disease saved a generation from unnecessary suffering. It was a fertile time too for headline writers: Viagra, a little-known agent used to treat pulmonary arterial hypertension, quickly changed the outlook for erectile dysfunction. And who could forget Dolly the (cloned) sheep? Biology appeared to be ushering in a brave new world, while innovation in medical chemistry and physics lagged behind.

Advances in radiology and laboratory science brought faster and better results from smaller and easier tests, but not many breakthroughs. The biggest leap forward was in almost universal access to hospital-based imaging equipment like X-Rays and CT scans, but the cost and functionality of "newer" technologies like MRI and PET scans were still being debated.

"Do you need electricity to help you, Dr Walker?"

These two technologies, which respectively use strong magnetic fields and special dyes with radioactive tracers, offer huge amounts of information but at the time their functionalities were not fully understood, and frequently offered too low resolution to provide diagnostic certainty especially in areas like the brain. I remember the chairman of the hospital department where I first worked admonishing me on morning rounds: "Don't you know how to examine your patients, or do you need electricity to help you, Dr. Walker?"

Largely off the clinical radar, a different type of science was emerging that would have a massive impact on the way we think about patient care: communications technology. While many of us quickly embraced the internet, email and 2G mobile phones, there was no immediate link to our medical practice - except bragging rights for owning a clunky flip phone with a 30-minute battery life. We had to hand-write all of our notes in the medical record, carry around a heavy patient chart, call the operating room to figure out scheduling and wear an annoying pager that would beep incessantly. We didn't even use the word "landline" because mostly, no one knew there was another kind of line. Other than the pager, "luxury" gadgets just weren't part of the hospital system. There were very few applications for artificial intelligence and "big" data meant 18-point font spreadsheets.

Fast forward to 2016. I survived all of my training (barely) and now walk the hospital corridors as an attending physician guided by those proverbial four words: first do no harm. That mantra frames my aspiration to respectfully provide my patients and their families

5 predictions for energy in 2030



Image: REUTERS/Heinz-Peter Bader

10 Nov 2016

Jane Burston
Executive Director, Clean Air Fund

This article is part of the Annual Meeting of the Global Future Councils

The energy sector has probably undergone more rapid change in the last ten years than in the previous fifty. In a matter of a decade, shale gas production in the US increased by more than a factor of ten, taking US gas imports to their lowest level since the early 80s. Solar costs have come down so considerably that solar as cheap as regular grid electricity in some parts of the world, despite prices being previously projected to increase over the same period due to poor availability of silicon feedstock. After the shock of the Fukushima disaster, many developed nations are exiting from nuclear, despite reasonable public and government support before the disaster.

This graph shows the time-trend of dry shale gas production for the major shale gas producing formations. It clearly shows that the Marcellus Shale formation got off to a relatively late start but quickly became the national production leader.

Image: Energy Information Administration

With that rate of change in mind, I can confidently predict that the next ten years will be just as unpredictable as the last. Nevertheless there are trends appearing that lead me to think that the headlines we'll be reading about energy in 2030 will be largely positive.

Transporting myself to the future, here is my look at the top five trends that I think, and hope, we can expect to see.

1. A global carbon price is established

China's national emissions trading scheme had some teething problems after starting in 2017, but by the early 2020s the scheme was responsible for fifty percent of China's emissions reductions. The presence of the scheme reduced concerns about carbon leakage and competitiveness in other countries, leading to more countries starting their own emissions trading schemes. All countries included the energy sector in their nascent schemes, with knock-on impact for fossil-energy prices and the attractiveness of investing in renewables worldwide.

After the European Commission decision to rectify the over-allocation of allowances in the EU Emissions Trading Scheme, the European and Chinese schemes were able to link. By the mid 2020s, the new Latin American and Canadian-Californian schemes had begun negotiations for inclusion, paving the way for a global carbon price by 2030. This means that there is one price, applicable all over the world, for the right to emit a tonne of CO2 into the atmosphere - providing a simple and powerful incentive to make the switch to clean energy.

2. Investment into renewables more than quadruples as divestment from coal becomes widespread

In 2013 the US stopped investing in new coal-fired projects overseas, that same year the World Bank Group limited its financing of new coal projects and in 2015 the Norwegian Sovereign Wealth Fund pledged its intention to divest from coal. Spurred on by increasing focus on the long term risk associated with stranded assets, pension funds and other

institutional investors followed suit throughout the 2020s, switching to investing in renewables on a global scale.

By 2030 there is over $1.2 trillion annually invested globally in renewables, more than five times the investment into fossil fuels.

Image: renewableenergyhub.co.uk

3. Public engagement in energy soars in areas with community energy ownership

Many developed countries fell well behind their energy efficiency targets in the 2020s due to lack of public engagement. Consequently governments were forced to focus more on decarbonising energy generation, leading to increased financial incentives and reduced regulatory barriers for household and community renewables ownership.

In 2030, individual and community energy generation contributes to more than fifty percent of the energy mix in developed countries, up from less than five percent in 2016. Not only that but research shows that these areas have significantly higher uptake of energy efficiency technologies, vastly reduced energy consumption, and much lower resistance to previously divisive technologies such as onshore wind.

Politicians begin to see community energy ownership as the way to finally get citizens engaged in their energy future and to remove social and cultural barriers to the most affordable renewables.

4. Europe becomes the centre of production for next generation renewables

Having lost much of the production of silicon solar PV to China, European governments saw the potential of advanced manufacturing techniques for gaining a lead in next generation renewables and invested heavily in R&D alongside multinationals.

Europe became the centre of production for thin film solar PV, where reel-to-reel printing with in-process verification enables panels with near-silicon scale efficiency being produced at a fraction of the cost. 3D printing enabled lower cost and faster production of very large wind turbine blades by reducing the complexity and energy intensity of production. In 2030, Europe finds itself at the heart of renewables production once again, with growing markets worldwide for the next generation technologies it is producing.

5. The fossil fuel lobby is (almost) a thing of the past

Widespread electrification of transportation and heat, the move to a smart grid, and the vastly increased need for energy storage created huge opportunities throughout the 2020s for new companies to get involved in the energy sector. As expected, progressive incumbents and start-ups led the field initially, but in 2030 the market is dominated by companies previously strong in other sectors.

Food retailers are using distributed cold storage assets to provide large scale and affordable energy storage, vehicle manufacturers are selling energy management as a service, and IT departments of major companies have moved from a cost centre to a profit centre by utilising their UPSs to provide half hourly grid-balancing.

These established companies know what market conditions they need for their new products to prosper, and how to get them. In 2030, the energy lobby looks very different. Powerful voices once concerned with agricultural subsidies or air quality targets are now asking for cost-reflective energy pricing and the removal of fossil fuel subsidies. The vested interests of the past are finding that their grip on power is in decline.

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Written by

Jane Burston, Executive Director, Clean Air Fund

The views expressed in this article are those of the author alone and not the World Economic Forum.

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US AG David Weiss Fw: trump is named Email:BlackRock Series Fund_ Inc._ Form N-PX_ Part 2 of 2

From: Meg Kelly (meghankellyesq@yahoo.com)

To: david.weiss@usdoj.gov

Cc: meghankellyesq@yahoo.com

Date: Sunday, September 5, 2021, 07:33 PM EDT

Hi David,

This entity may be buying up land at a higher price, to place the people in a take it or leave it position on rent or land prices down the line, in line with the world economic founder's plans. As you know, since you are a finance expert, offshore accounts are not likely to be lost should an economic crash occur. They are not risky since they do not charge interest, to be relent out to gain interest. Plus, if interest and income is not gained, governments do not oversee them for taxable gain.

We are in big trouble outside of my case. Mr. Trump has an interest in this Delaware entity.

The federal government may run out of funds in October or November. Please persuade President Biden to coin, interest free money without borrowing it as President Lincoln and Kennedy did. There is a way to prevent economic crash, and the partners taking over government power to eliminate the limited government that makes us more free.

Thank you for your kind consideration. I hope you choose to be the world's hero. We need the courts to save the day too.

Very truly,
Meg

----- Forwarded Message -----
From: Meg Kelly <meghankellyesq@yahoo.com>
To: Matthew <matthewkosiorek@comcast.net>
Sent: Tuesday, December 8, 2020, 08:44:31 PM EST
Subject: Fw: trump is named Email:BlackRock Series Fund_ Inc._ Form N-PX_ Part 2 of 2

i wonder if you read what I sent my brief. i love you

----- Forwarded Message -----
From: "lexisnexisdelivery@lexisnexis.com" <lexisnexisdelivery@lexisnexis.com>
To: "meghankellyesq@yahoo.com" <meghankellyesq@yahoo.com>
Sent: Tuesday, December 8, 2020, 06:36:31 PM EST
Subject: trump is named Email:BlackRock Series Fund_ Inc._ Form N-PX_ Part 2 of 2

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BlackRock Series Fund_ Inc._ Form N-PX_ Part 2 of 2.docx
1.1MB



BlackRock Series Fund, Inc.; Form N-PX, Part 2 of 2

August 22, 2007

Company Information

Address: WILMINGTON, DE, 19809

CIK: 319108

Filing Data

Report Period: June 30, 2007

SEC File Number: 811-03091

Accession Number: 0000900092-07-000358

Text

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549
FORM N-PX
ANNUAL REPORT OF PROXY VOTING RECORD OF REGISTERED
MANAGEMENT INVESTMENT COMPANY
Investment Company Act File Number 811-03091
Name of Fund: BlackRock Series Fund, Inc.
BlackRock Balanced Capital Portfolio
BlackRock Fundamental Growth Portfolio
BlackRock Global Allocation Portfolio
BlackRock High Income Portfolio
BlackRock Large Cap Core Portfolio
BlackRock Global SmallCap Portfolio
BlackRock Equity Dividend Portfolio

Meeting Date: MAY 8, 2007 Meeting Type: Annual
Record Date: MAR 19, 2007

#	Proposal	Mgt Rec	Vote Cast	Sponsor
1	Elect Director Thomas W. Adams	For	For	Management
2	Elect Director Peter D. Kinnear	For	For	Management
3	Ratify Auditors	For	For	Management

TRONOX, INC
Ticker: TRX Security ID: 897051207
Meeting Date: MAY 8, 2007 Meeting Type: Annual
Record Date: MAR 19, 2007

#	Proposal	Mgt Rec	Vote Cast	Sponsor
1	Elect Director Thomas W. Adams	For	For	Management
2	Elect Director Peter D. Kinnear	For	For	Management
3	Ratify Auditors	For	For	Management

TRUE RELIGION APPAREL, INC.
Ticker: TRLG Security ID: 89784N104
Meeting Date: MAY 16, 2007 Meeting Type: Annual
Record Date: MAR 30, 2007

#	Proposal	Mgt Rec	Vote Cast	Sponsor
1.1	Elect Director Jeffrey Lubell	For	For	Management
1.2	Elect Director Joseph Coulombe	For	For	Management
1.3	Elect Director G. Louis Graziadio, III	For	For	Management
1.4	Elect Director Robert L. Harris, II	For	For	Management
1.5	Elect Director Mark S. Maron	For	For	Management
2	Ratify Auditors	For	For	Management

TRUMP ENTERTAINMENT RESORTS INC
Ticker: TRMP Security ID: 89816T103
Meeting Date: MAY 2, 2007 Meeting Type: Annual
Record Date: MAR 9, 2007

#	Proposal	Mgt Rec	Vote Cast	Sponsor
1.1	Elect Director Morton E. Handel	For	For	Management
1.2	Elect Director James B. Perry	For	For	Management
1.3	Elect Director Donald J. Trump	For	For	Management
2	Ratify Auditors	For	For	Management

TRUSTCO BANK CORP NY
Ticker: TRST Security ID: 898349105
Meeting Date: MAY 14, 2007 Meeting Type: Annual
Record Date: MAR 22, 2007

#	Proposal	Mgt Rec	Vote Cast	Sponsor
1.1	Elect Director Joseph A. Lucarelli	For	For	Management
1.2	Elect Director Robert A. McCormick	For	For	Management
2	Ratify Auditors	For	For	Management

TRUSTMARK CORP.
Ticker: TRMK Security ID: 898402102
Meeting Date: MAY 8, 2007 Meeting Type: Annual
Record Date: MAR 12, 2007

#	Proposal	Mgt Rec	Vote Cast	Sponsor
1.1	Elect Director J. Kelly Allgood	For	For	Management
1.2	Elect Director Reuben V. Anderson	For	For	Management
1.3	Elect Director Adolphus B. Baker	For	For	Management
1.4	Elect Director William C. Deviney, Jr.	For	For	Management
1.5	Elect Director C. Gerald Garnett	For	For	Management
1.6	Elect Director Daniel A. Grafton	For	For	Management
1.7	Elect Director Richard G. Hickson	For	For	Management
1.8	Elect Director John M. McCullouch	For	For	Management
1.9	Elect Director Richard H. Puckett	For	For	Management
1.10	Elect Director R. Michael Summerford	For	For	Management

Kelly v Trump 21-5522 Fw: Your package shipped

From: Meg Kelly (meghankellyesq@yahoo.com)

To: david.weiss@usdoj.gov

Cc: meghankellyesq@yahoo.com

Date: Wednesday, September 1, 2021, 07:22 PM EDT

Hi David,

I thought I could think of a way to close Bush Junior's back door with my case against the President, President Biden. I discovered my computer is under warranty, and sent it out today. I thought you might be able to use your resources to see if I was hacked. It is just an idea, even outside of my present case, to prevent the world economic crash planned by the world economic forum's partners as outlined in the two books I sent you.

I hope you are well. I am not. I am embarrassed and upset at other attacks relating to my case. I am scared. I am not safe. I have to stop crying to faithfully stand up for my faith in Jesus without regard to the consequences. Jesus teaches us not to fear the one who can destroy the body, but the body and eternal life

Attached, please find the notice required pursuant to Rule 12.3. I stuck them in the mail box at the post office today.

Could you please send them to the solicitor General and Merrick Garland via email? I do not have their emails. It is for their convenience.

Thank you for your help.

On an aside, I see you worked in finance. I hope you can think outside of the box of your training to analyze ways to prevent the elimination of physical currency and the US economic crash and global crash. It is never impressive to hear someone say, "his mind is like a well oiled machine or mechanical, going through the motions or such". It is better to use your free will, your brain, to choose to analyze, not ignore, to think outside of the box of training and stiff necked laws, to care to love, by preventing harm and eternal harm leading to temptations for others to harden their hearts for crypto cash, or survival.

I have a few ideas where you can save the world, if you so choose, by preventing or reversing the planned, preventable, intentional economic crash.

Thank you. Have a good night, and stay safe.

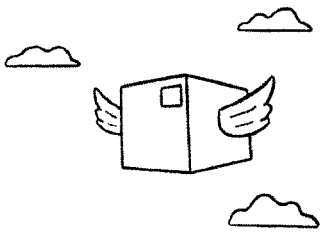
Best regards,
Meg

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

From: Product Protection Team <statusupdate@retail-email.asurion.com>
To: "meghankellyesq@yahoo.com" <meghankellyesq@yahoo.com>
Sent: Tuesday, August 31, 2021, 02:17:34 PM EDT
Subject: Your package shipped

asurion

Here it comes!



We're mailing you packing materials and a prepaid shipping label.

When it arrives, save the box and follow the instructions to send your product to us so we can take a look.

Track package

At any time you can check the status of your claim.

Service request (SR#): 1637631005

www.asurion.com
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Asurion LLC. 648 Grassmere Park Drive, Nashville, TN 37211

Do not reply to this message.

David Weiss.pdf
87.3kB

merrick garland.pdf
88.1kB

Proof of service To counsel for Respondent per Rule 12 3.pdf
44.6kB

solicitor general.pdf
87.3kB

My computer broke & this is proof they were mailing it back.

Fwd: Computer crashed

From: meghankellyesq@yahoo.com

To: david.weiss@usdoj.gov

Cc: meghankellyesq@yahoo.com

Date: Tuesday, August 24, 2021, 07:35 AM EDT

Dear Mr. Weiss,

My computer crashed after I attempted to electronically file my brief with the US Supreme Court.

This same thing happened when I filed my brief to the DE Supreme Court

I thought the cause of the initial crash months ago was because I checked Facebook messenger, but it is too coincidental not to be concerned.

Last time my computer crashed I had to ship it out for repairs. I do not have access to a working computer at this time.

I must think of a way to require Biden close the back door to our electronic devices, should I succeed in the US supreme court.

On an aside, should I be killed, know I do not want to do. I desire to live faithfully loving God foremost, and subordinantly loving humanity, not giving into the temptation of fear based threats to bend my will to serve the sins of others.

I am in danger. You are not the enemy. I think that you may be the hero that prevents an economic crash by guiding the misguided court to save the country.

Thank you,
Meg
Ps I wanted to send you all of the files you will receive on a box today via email. I am sorry I am unable to do so at this time.
Please let me know if you want copies emailed to you. After I get my computer issue resolved, I can send you the docs I filed with the US supreme court. Thank you.

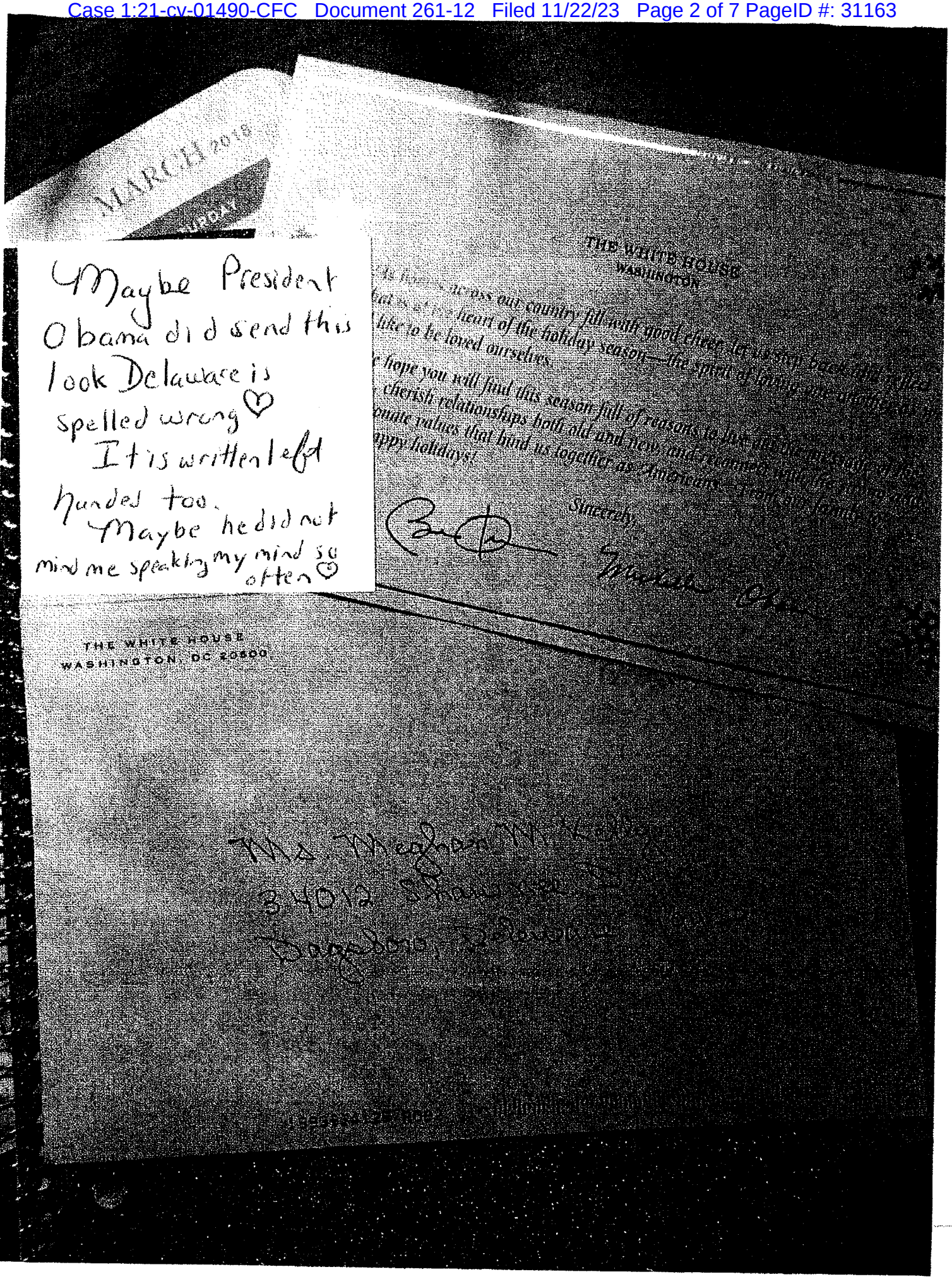
---------- Forwarded message ----------
From: meghankellyesq@yahoo.com
Date: Aug 23, 2021 8:32 PM
Subject: Computer crashed
To: meghankellyesq@yahoo.com
Cc:

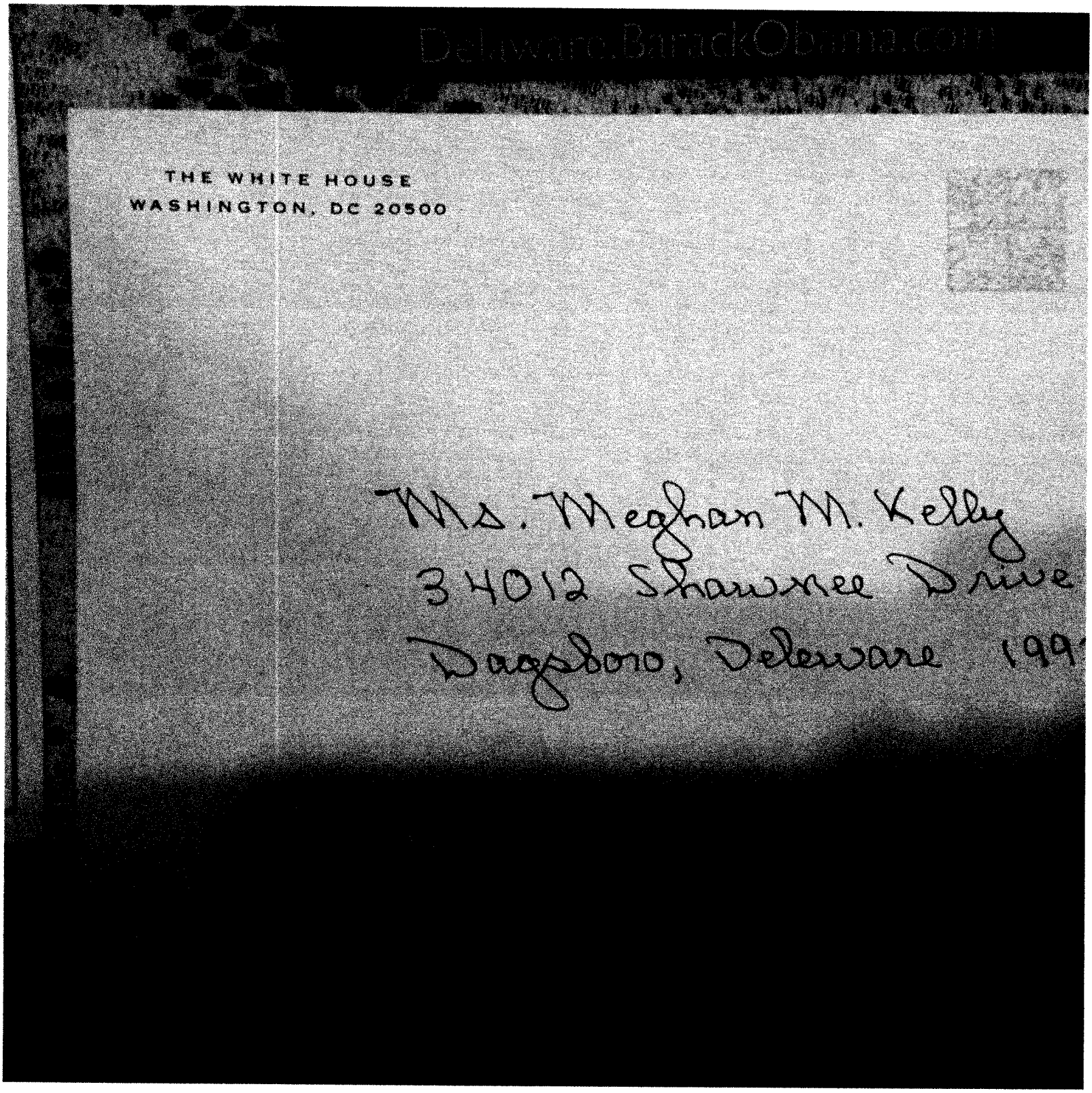
IMG_20210823_201843.jpg
1.9MB

IMG_20210823_201842.jpg
1.9MB

IMG_20210823_201831.jpg
2MB

District Court Exhibit 10


MARCH 2015
THE WHITE HOUSE
WASHINGTON
Maybe President Obama did send this look Delaware is spelled wrong ♡ It is written left handed too. Maybe he did not mind me speaking my mind so often ♡
THE WHITE HOUSE
WASHINGTON, DC 20500


DelawareBarackObama.com
THE WHITE HOUSE
WASHINGTON, DC 20500
Ms. Meghan M. Kelly
34012 Shawnee Drive
Dagsboro, Delaware 199

Response to Your Message

From: The White House (noreply@whitehouse.gov)

To: meghankellyesq@yahoo.com

Date: Wednesday, February 10, 2016, 05:17 PM EST

President Obama called me Linda

Dear Linda:

Thank you for writing. Messages like yours mean a great deal to me.

Each day, people in Louisiana and across our country are striving for a brighter future by working hard and embracing the optimism that has driven America forward for generations. As long as I'm President, I'll keep pouring everything I have into reaching for that future, too. I'm confident that together, we can ensure ours is a nation where all things are possible for all people.

Again, thank you for writing—it reminds me who I'm here to serve. I wish you all the best.

Sincerely,

Barack Obama

Facebook Twitter YouTube Flickr iTunes

Fw: Response to Your Message

From: Meg Kelly (meghankellyesq@yahoo.com)

To: matthewkosiorek@comcast.net

Date: Sunday, December 27, 2015, 08:16 PM EST

----- Forwarded Message -----
From: The White House <noreply-correspondence@whitehouse.gov>
To: "meghankellyesq@yahoo.com" <meghankellyesq@yahoo.com>
Sent: Wednesday, December 23, 2015 7:24 PM
Subject: Response to Your Message

Dear Meghan:
Thank you for writing, and for your thoughtful input. Messages like yours serve as an important reminder of the work that still lies ahead, and they reflect a commitment to staying engaged in shaping the future we know is possible. As long as I'm President, I'll keep pouring everything I have into securing a brighter tomorrow for people across our country.
Again, thank you for writing. By embracing hope and speaking out on issues that matter to you, you can help make a difference. I want you to know I'm listening, and I wish you all the best.
Sincerely,
Barack Obama

Facebook **Twitter** **YouTube** **Flickr** **iTunes**

Response to Your Message

From: The White House (noreply@whitehouse.gov)

To: meghankellyesq@yahoo.com

Date: Wednesday, March 16, 2016, 02:36 PM EDT

Dear Meghan:

Thank you for writing. Our Nation has made great strides over the last seven years, and we should be proud of what we have accomplished together. I'm humbled by the privilege to serve in this Office, but I suspect that more than my Presidency, it's the optimism and hard work of people like you that have changed our country for the better.

America still faces many challenges, and our success is not inevitable. It will depend on all people raising their voices, rejecting the cynical notion that progress is not possible, and making sure our politics reflect what is best in us. I will keep your words of support in mind as I continue doing all I can to help bring about the kind of lasting change we can only make together.

Sincerely,

Barack Obama

Response to Your Message

From: The White House (noreply@whitehouse.gov)

To: meghankellyesq@yahoo.com

Date: Tuesday, January 3, 2017, 04:49 PM EST

Dear Meghan:

Thank you for writing. Messages like yours have motivated me and informed my Presidency, and I appreciate your perspective.

Our brand of democracy is hard, and change takes time. I know politics can sometimes seem frustrating, but despite all the rancor, it is important to remember that ordinary people are making a difference each day in every part of our country. And they aren't driven by blind optimism, but by the deeply felt and profoundly American understanding that in the face of impossible odds, those who love our country can change it.

Through trial and triumph alike, America has always overcome challenges and emerged stronger because we've come together as one people. Our progress depends on folks like you who seize the responsibility of citizenship by speaking out on issues that matter to them. The future is ours to write, and I trust you will use your talents to help America reach a brighter day.

Sincerely,

Barack Obama

District Court Exhibit 11

EFiled: Dec 07 2020 09:09AM EST
Transaction ID 66163090
Case No. 2020-0809-PWG

COURT OF CHANCERY
OF THE
STATE OF DELAWARE

PATRICIA W. GRIFFIN
MASTER IN CHANCERY

CHANCERY COURTHOUSE
34 The Circle
GEORGETOWN, DELAWARE 19947

December 7, 2020

Via U.S. Mail
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, Delaware 19939

Re: *Meghan Kelly v. Donald Trump, et al.*
C.A. No. 2020-0809-PWG

Dear Ms. Kelly:

This letter is to acknowledge your December 1, 2020 letter to me concerning difficulties you are having with the cost of mailing case documents to the Register in Chancery's office in New Castle County, rather than being allowed to drop the paperwork off at the Register in Chancery's office in Sussex County. I am also aware of Ms. Kruger's email to you that day indicating that, although court policy generally requires that documents be filed in the county where the matter is pending, you can bring case documents to the Register in Chancery's office in Sussex County and they will scan the documents and send documents related to the exceptions pending in New Castle County to that county. I believe that accommodation addresses your concerns.

Sincerely,

/s/ Patricia W. Griffin
Master in Chancery

District Court Exhibit 12

MEGHAN MARIE KELLY, ESQUIRE
34012 Shawnee Drive
Dagsboro, DE 19939

December 11, 2020

Register in Chancery
Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

REGISTER IN CHANCERY
GEORGETOWN DELAWARE
2020 DEC 11 P 12:52

RE: Meghan Kelly v. Donald J. Trump, et. al, Case No. 2020-0809-Master PWG

Thank you/New Supreme Court Order

Dear Honorable Master Patricia Griffin:

Thank you for your letter. I thought I was going to get into trouble with you. Instead, you bestowed me kindness and mercy.

It made me teary eyed with unexpected joy by your kind act.

Usually, when I ask for help, I get into trouble from those I ask.

When I was in law school, I had rats in my apartment during my final exams and bar exams. I asked the Christian law school I leased the apartment from, Duquesne, for help. They did not help me. Instead, they increased my rent. The newspapers helped me, and the tv station helped me.

Did I get rescued out of the situation? No. But they remain my heroes because they did the right thing. That is more important than winning or losing. See attached under Exhibit A.

During my Delaware Bar Exam studies at Weidner Law School, my dorm ceiling leaked water all over my bar materials. I asked for help from Weidner and reached out to the Board of Bar examiners. I got scolded by the administrator of the bar in a private room instead.

When I ran for office as a democrat, the democrats did not help me, and appeared to sabotage my run, per my complaint which is an exhibit to the brief.

You know who did help me? The press. They allowed me to share my ideas on paper, impartially, just as they allowed the other side to do the same.

That is why the press is my hero. I lost, but they gave me, the voiceless a voice.

You are my hero too. Winning or losing is not most important, doing the right thing is. Allowing all people, regardless of wealth, poverty, political party, religion, race or place of origin an opportunity to seek justice, which is never guaranteed, is the right thing.

Thank you for doing the right thing for a peon like me, by affording me the opportunity to sue the most powerful man in the world. It is not me I have faith in. It is you (God too), the court system, democracy, and the pursuit of justice. Our system of government recognizes how imperfect man

is, by instilling checks and balances which limits the three imperfect branches. So, none would proudly assert imperfect dominion. Each branch remains humbled at the prospect of potential correction, your potential edification. No branch, nor any human is perfect. None are God but God.

I am sorry if I let the Court, democracy and God down in this case. If I should fail to plead sufficiently, I will just get right back up and try to do the right thing again differently with humility.

I am kind of getting used to falling down now, but I am not used to those in authority helping me up, as you have done by your letter, and as the Delaware Supreme Court has done by allowing for pleasings to be filed by email too, per Order Number 6. Exhibit B.

I emailed Brenda McKinnon, in the upper Delaware Chancery Court my brief and the exhibits attached thereto on Monday December 7, 2020 completed at 10:20 AM. I mailed the Court everything on Monday December 7, 2020, and the post office indicated it was received on December 8, 2020 at 8:17 am. Exhibit C.

But she has not been able to confirm receipt yet. So, I may have to file again in your office.

I forwarded the E-mailed filed documents to Katrina Krugar, and asked for her to please hang onto them and standby in case upper Delaware continues to have trouble receiving the documents.

For your convenience, I am also dropping off a set of the filed documents to possibly ease in filing in case upper Delaware needs help. If not, in case I succeed, it would be good for you to have a copy too.

If the Upper Delaware Court needs help filing, would you please help them and me by filing it on the December 7, 2020 date, 10:20 AM, with only one court stamp confirmation on the Brief to alleviate the burden on the Court. The Court need not stamp every document.

Should my case remain alive, the Delaware US Attorney General will likely seek to remove my case to the federal court since he knows my concerns about driving and mailing.

I do not regret putting my foot into my own mouth. I believe that your Court will save not only America, but the World. You do not need me for this Court to do so.

I think whichever Court hears my case, they will have power to save the world too, just not as much power as you, and the Delaware Chancery Court.

I believe the Courts will be our heroes in history. I believe their words are more powerful than weapons. The impartial rule of law is more powerful than reign by those with money, power and connections without restraint called enforceable laws.

We are not a nation of sword fights, gun duels and fist fights. We are a nation of laws that limits all people, with more limits on those with power in the government, to make the common man, even a peon like me, somehow more equal to the most powerful person in America, the President.

The limits on our Constitutional freedoms in the form of laws, makes us all more free.

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

Lawlessness is not freedom. Deregulation is not freedom. It is anarchy.

Thank you,

Meghan Kelly, Esquire
Pro Se, Bar # 4968
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 988)

CC. Attorney General William Barr, Esq.

EXHIBIT

A



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Lawrence Walsh: Rat is unwelcome study partner

Wednesday, June 29, 2005

By Lawrence Walsh, Post-Gazette Staff Writer

A pregnant rat running between your legs in your bedroom isn't conducive to studying for final exams.

That's what Meghan Kelly said happened to her in early May in her 10th-floor apartment in Brottier Hall at Duquesne University. The 20-story building was formerly known as Citiline Towers and the Cricklewood Hill Apartments.

"I haven't been able to get a good night's sleep since it happened," said Kelly, a law school graduate now studying for the bar exam next month.

She said the rat ran under a bed and into a hole beside the heating and air-conditioning unit in a bedroom.

Kelly notified the university. The university sent an exterminating company to inspect her room. It found no evidence the rat had taken up residence in the apartment, but it put out traps to capture any transient rodents.

Then Kelly found a baby rat in a trap. She again called the university. The exterminator returned for another inspection, but found no signs that mama rat had made herself at home. They again set out traps.

After successfully passing her law school exams last month, Kelly began studying for the bar exam. Law school graduates must pass the two-day test to obtain a license to practice law in Pennsylvania.

Unnerved by her encounter with the pregnant rat, Kelly said she tried to

sleep as best she could. She initially thought a tapping sound she heard next to the head of her bed came from a heating and cooling unit. Then she thought it might be a rat trying to get out.

She called the Allegheny County Health Department. She also contacted the Pittsburgh Post-Gazette.

Dennis Lauria, a county environmental health specialist, inspected her apartment last Tuesday. He ordered the university to place rat glue traps under the heating and cooling units in each room. The traps are designed to trap rodents by attracting them to the sticky surfaces that prevent them from moving after they step on them.

Lauria also ordered the university to repair a hole in the ceiling of a hallway closet in Kelly's apartment. Although he found no evidence of rodents in her unit, he found some on the ground level of the building.

He found "rodent droppings, carcasses, rub marks, chewed areas or burrows" in the garage. He also noticed that rodents could crawl under the closed garage doors. He ordered the university to "rodent-proof the garage doors" and to "remove food sources, harborage areas and eliminate entries."

Lauria also said the garbage storage area had garbage on the floor. He ordered that it be cleaned up and that bait stations be placed in the garbage storage and receiving areas. He found rat ground burrows about 20 feet from the two garage doors, one of which is open during the day to provide egress and ingress for employees and workers renovating the building.

At Kelly's invitation, I accompanied Lauria on a reinspection of her apartment yesterday. He found mouse droppings and mouse hair on a glue trap under one of her heating and cooling units. "I'll add that to my report," he said.

During a reinspection of the ground level of the building, Lauria said building employees had done a lot of clean-up work since his first visit. There was no garbage on the floor of the garbage receiving and storage areas. But at least one rat had entered the garage. Visible evidence of its presence was near a trap that had been sprung.

Although Lauria gave the university until July 12 to comply with the orders he issued last week, he said employees already had corrected most of them.

He was impressed with the steel strips attached to the bottom of one of the garage doors to keep out four-legged trespassers.

"We take this matter very seriously," said Bridget Fare, a university spokeswoman. "We started addressing it the day after [Kelly] notified

us. We are working with the health department to address it and we will continue to monitor it."

I'll keep you posted.

Post Your Problems appears Tuesday through Friday, addressing questions and problems from readers. Yvonne Zanos from KDKA-TV looks into consumer-related issues, including difficulties with products and services. Post-Gazette Staff Writer Lawrence Walsh helps sort through bureaucratic problems.

(Lawrence Walsh can be reached at 412-263-1895. His e-mail address is [illegible])

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EXHIBIT

B

IN THE SUPREME COURT OF THE STATE OF DELAWARE

IN RE COVID-19	§
PRECAUTIONARY MEASURES	§

ADMINISTRATIVE ORDER NO. 14

EXTENSION OF JUDICIAL EMERGENCY

On this 2nd day of December 2020:

WHEREAS, under the Delaware Constitution, Article IV, § 13, the Chief Justice of the Delaware Supreme Court is the administrative head of all the courts in the State and has general administrative and supervisory powers over all the courts;

WHEREAS, under 10 *Del. C.* § 2004(a), the Chief Justice, in consultation with other members of the Supreme Court, has the authority to "declare a judicial emergency when the Chief Justice determines that there are emergency circumstances affecting 1 or more court facilities;"

WHEREAS, under 10 *Del. C.* § 2004(a), "emergency circumstances" includes "disease … or other natural or manmade causes [affecting] the ability to access the courthouses, or the ability to staff courts;"

WHEREAS, under 10 *Del. C.* § 2004(c), an order declaring a judicial emergency is limited to an initial duration of not more than 30 days, but may be modified or extended for additional periods of 30 days each;

WHEREAS, under his authority set forth in 20 *Del. C.* ch. 31, Governor John C. Carney, on March 12, 2020, declared a State of Emergency for the State of Delaware due to the public health threat caused by COVID-19, and extended the State of Emergency on April 10, 2020, May 8, 2020, June 6, 2020, July 6, 2020, August 5, 2020, September 3, 2020, October 2, 2020, October 30, 2020, and November 25, 2020;

WHEREAS, under 10 *Del. C.* § 2004, the Chief Justice, in consultation with other members of the Supreme Court, declared a judicial emergency that went into effect on March 16, 2020 at 8:00 a.m., and extended the judicial emergency in orders dated April 14, 2020, May 14, 2020, June 5, 2020, July 6, 2020, August 5, 2020, September 4, 2020, October 2, 2020, and November 2, 2020;

WHEREAS, on May 26, 2020, the Courts Reopening Committee established by the Chief Justice submitted an interim report recommending a four-phase approach to reopening the courthouses to additional employees and the public;

WHEREAS, in an order dated June 5, 2020 ("Administrative Order No. 7"), the Chief Justice accepted the recommendations of the Courts Reopening Committee and the Justice of the Peace Court for reopening;

WHEREAS, Phase 1 of the Reopening Plan commenced on June 8, 2020, and Phase 2 of the Reopening Plan commenced on June 15, 2020;

WHEREAS, the Courts Reopening Committee submitted to the Chief Justice, in August 2020, a plan for resuming jury trials ("Jury Management Plan") attached as Exhibit 1 to an order dated September 4, 2020 ("Administrative Order No. 10");

WHEREAS, on September 4, 2020, the Chief Justice accepted the Jury Management Plan, and, subject to further review if COVID-19 conditions deteriorated, determined that Phase 3 of the Reopening Plan, as set forth in Administrative Order No. 10, would commence on October 5, 2020;

WHEREAS, on October 5, 2020, Phase 3 of the Reopening Plan, as modified in Administrative Order No. 10 commenced;

WHEREAS, on November 16, 2020, in light of the deterioration of COVID-19 conditions in the State, the Chief Justice ordered the courts to postpone jury trials and transition back to Phase 2 of the Reopening Plan ("Administrative Order No. 13);

WHEREAS, COVID-19 continues to pose a serious risk to public health and safety of Delawareans, requiring the courts to continue taking steps to reduce the risk that COVID-19 poses to jurors, parties, witnesses, lawyers, judges, and court staff and the public who enter judicial facilities; and

WHEREAS, the Chief Justice, in consultation with the other members of the Supreme Court, the presiding judges, and health experts, has determined that extension of the judicial emergency is necessary;

NOW, THEREFORE, IT IS ORDERED that:

(1) Under the authority of 10 *Del. C.* § 2004, the judicial emergency for all State courts and their facilities in Delaware is extended for another 30 days effective December 5, 2020, subject to further review.

(2) The courts shall continue to operate under Phase 2 of the Reopening Plan as set forth in Administrative Order No. 7 and Administrative Order No. 13;

(3) In light of the continuing threat COVID-19 poses to public health, all courts in the State are authorized, to the greatest extent possible under 10 *Del. C.* § 2008, to continue to utilize audiovisual devices at their facilities and remotely to conduct proceedings (except for jury trials) for the duration of this order.

(4) During the period of judicial emergency, all time requirements under the Speedy Trial Guidelines are tolled.

(5) Administrative Order No. 3 regarding the suspension of any requirements for sworn declarations, verifications, certificates, statements, oaths, or affidavits in filings with the Supreme Court, the Court of Chancery, the Superior Court, the Family Court, the Court of Common Pleas, or the Justice of the Peace Court will remain in effect.

(6) Each courthouse shall continue to provide a method, such as a dropbox or mailing address, for attorneys and the public to fill out and file paper documents if electronic filing is not available to them. For such cases, the courts shall continue to provide, when practical, an email address for attorneys and the public to email paper documents which will be considered filed with the court when received.

(7) The Clerk of the Court is directed to transmit forthwith a certified copy of this Order to the clerk of each trial court in each county.

BY THE CHIEF JUSTICE:

/s/ Collins J. Seitz, Jr.
Chief Justice

EXHIBIT

C

UNITED STATES POSTAL SERVICE.

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Expected Delivery Date Tue 12/08/2020			
Tracking #: 9505 5153 8866 0342 2734 62			
Insurance			$0.00
Up to $50.00 included			
Affixed Postage			-$11.00
Affixed Amount: $11.00			
Total			$4.05
Grand Total:			$4.05
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****
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IN THE CHANCERY COURT OF THE STATE OF DELAWARE

Meghan Kelly,	)	
	)	Civil Action No.: 2020-0809-PWG
Plaintiff	)	
v.	)	
Donald J. Trump, et. al,	)	
	)	
Defendant.	)	

Certificate of Service

I hereby certify that on December 11, 2020, I caused Plaintiff's letter to the Honorable Master Patricia Griffin, dated December 11, 2020, and exhibits thereto, along with this certificate of service to be mailed to:

US Attorney General
William Barr, Esquire
950 PA Ave. NW Ste 7141
Washington, DC 20530

11 M.K

December ~~9~~, 2020

Respectfully Submitted,

Meghan Kelly
Pro Se
34012 Shawnee Drive
Dagsboro, DE 19939

District Court Exhibit 13

MEGHAN MARIE KELLY, ESQUIRE
34012 Shawnee Drive
Dagsboro, DE 19939

January 7, 2021

Delaware Supreme Court
55 The Green
Dover, DE 19901

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

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

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

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

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

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

which I believe is the mark of the damned should they not unharden their hearts).

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

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

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

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

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

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

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

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

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

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

My old law firm was interested in me in 2020. I was negotiating for a position, per the attached emails. I stopped the negotiations to sue the

Democrats because seeking to do the right thing is more important than money. Then, the pandemic hit. I withdrew my law suit since I did not want people to die, and reached out to my law firm. Negotiations are on a stand still. Covid19 hampered prospects.

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

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

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

Thank you for your kind consideration.

Respectfully submitted,

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

Re: McDonnell/Meg Kelly/ void November 19 Contract

From: Christie McDonnell (christie.mcdonnell@mcdonnelllawfirm.com)

To: meghankellyesq@yahoo.com

Cc: Virginia.Gaitens@McDonnelllawfirm.com

Date: Friday, November 22, 2019, 08:38 AM EST

I tried to negotiate for more money

Good morning, Meg,

Per your request we will tear up the offer you signed thus making it null and void. We do not accept your counteroffer.

We wish you the very best.

****All Funds greater than $5,000 must be WIRED to our trust account. Please CALL your Closer if you need our wiring instructions. Due to the rise in wire fraud, our wiring instructions will not be resent via email. Please note that McDonnell and Associates does not change our wiring instructions. Please call your closer immediately if you receive revised wiring instructions.****

Regards,

Christie McDonnell
Chief Strategy Officer
(843) 375-8930 (office)
Christie.McDonnell@McDonnellLawFirm.com|McDonnellLawFirm.com

This message and any attachments are solely for the intended recipient and may contain confidential or privileged information. If you are not the intended recipient, any disclosure, copying, use, or distribution of the information included in this message and any attachments is prohibited. If you have received this communication in error, please notify us by reply e-mail and immediately and permanently delete this message and any attachments. Thank you.

On Nov 22, 2019, at 7:28 AM, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Good morning,

Please tear up the contract for $55,000.

Attached, please find my first salary as a licensed attorney, $135,000.00.

With this additional potential liability and responsibility should anyone mess up on IOLTA accounts, state and federal taxes, or attorney work product, I require a higher salary.

I do not need this job, but you need a managing attorney in Delaware, in addition to an office to perform any business in this state period.

You can always open additional offices to house employees, but few attorneys would manage because of the great risk.

I require a firm credit card for business expenses, and a detailed explanation on how taxes will be handled in Delaware.

I assume McDonnell's South Carolina head quarters would handle payroll and adhere to Delaware's local, state and federal income taxes. If this is not the case, I am not interested.

I must be able to oversee others through trustworthy team members or by other means.

I require details concerning the professional liability insurance that will cover me and any potential employees.

Down the line, I require anti-discrimination training based on gender, race, religion or place of origin to be signed by all employees.

Delaware is number 2 in foreclosures in the entire country. Your firm is merely opening up. I know this small start is going to grow dramatically into a large beast sooner than you realize. I need to tame this beast now. So I keep it under control and in adherence to Delaware law. So it does not transform into a monster.

I was disappointed to see Jennifer Cooper, Esq. is an attorney too, not an accountant.

I need to be able to have access to each and every item I must review on IOLTA accounts. I must be comfortable and may need a few days to practice in house in South Carolina. Please help me on this. This is mandatory. I must be comfortable adhering to the IOLTA. I must know how to adhere to them before I leave South Carolina.

Would you consider $135,000, my first year's salary as an attorney?

I am not going to be exploited, nor will I exploit others. I gave my life to God, not to man's greedy, self serving desires. I desire to serve, to teach respect for the dignity of every person in my life, regardless of race, religion or place of origin, not respect for the mere bottom line.

The purpose of my life is bigger than bucks. So is yours. Your life is worth more than money and can not be bought or enslaved by mere peanuts. I will not be exploited and enslaved for mere peanuts.

Thank you for your time. I am copying my most trusted friend.

Think about it.

Have a good weekend.

Best regards,
Meg Kelly, Esq.

Would you consider

Sent from my iPhone

Begin forwarded message:

From: matthewkosiorek@comcast.net
Date: May 18, 2013 at 9:16:00 AM EDT
To: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Richards

CONFIDENTIAL
MEMORANDUM

TO: Meghan Kelly

FROM: Gregory P. Williams

RE: **Employment Arrangement**

DATE: November 20, 2006

This memorandum outlines the arrangement, which was made concerning your employment with Richards, Layton & Finger, P.A.

The following arrangements have been established for your employment commencing November 20, 2006:

1. You will be subject to the same terms and conditions of employment as all other associates (including quality of work, oversight and annual review), except as set forth below. The Firm's expectation is that you will continue to work billable hours comparable to those worked by other full-time associates in the Business Department. All non-billable work hours should be approved by your assigning director.

2. You will be paid an annual base salary of $135,000. In the future, any adjustments will be made by the Ad Hoc Associate Salary and Bonus Committee.

3. You will not be entitled to bonuses. You may be eligible for bonuses in an amount which will be determined by the Firm.

4. You are not on track for admission to the Firm as a director and you will not be considered for election to the board of directors of the Firm.

5. You will have an assigning director and will generally, other than what is set forth in this memorandum, receive the same benefits as and otherwise be treated in a similar manner as any other associate.

6. These employment arrangements will be reviewed by the Firm on or ~~before June 30 of each year commencing with June 30, 2007, unless such~~ arrangements have been terminated.

7. As with all employees of the Firm, your employment is at-will.

Gregory P. Williams
President
Richards, Layton & Finger, P.A.

11/20/06
Date

Meghan Kelly

11/20/06
Date

RE: part 1 Happy Labor Day weekend/ Meg Kelly/old complaint against the democrats

From: Christie McDonnell (christie.mcdonnell@mcdonnelllawfirm.com)

To: meghankellyesq@yahoo.com

Date: Wednesday, September 9, 2020, 01:02 PM EDT

Hey Meg,
I hope you are doing well and staying safe! Are you looking to do contract closings? You may remember we do closings at borrowers homes/offices etc. I thought that was something you were not fond of doing.

-----Original Message-----
From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Sunday, September 6, 2020 8:58 AM
To: Christie McDonnell <Christie.McDonnell@mcdonnelllawfirm.com>; Christie McDonnell <Christie.McDonnell@mcdonnelllawfirm.com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: part 1 Happy Labor Day weekend/ Meg Kelly/old complaint against the democrats

Hi Christie,

I hope you are doing well, and staying safe.

I am working on a complaint for immediate equitable relief against President Trump that will likely go to the US Supre me Court.

I do not have to pay court costs if I make below poverty pay for state or federal courts, or even the Supreme Court. I do not know if costs must be paid should I retain an attorney down the line. I will ask the court.

In the meantime,
I am willing to work as an independent contractor for very low pay, not gaining personal income for what I bring in as I work on my personal task to save the country, or in the alternative I may be able to find an attorney who will not requi re I pay court costs.

I will send you a draft complaint. It is important that you insulate the firm from my personal venture, in case you are interested in me.

In the meantime, I am showing you what I filed against the Democrats and withdrew.

It is like the wild, wild West in Delaware. Biden will not be our hero. We have to choose to be the heroes for one another by our love for others.

I apologize, my new phone is not working, but I thank you for your time and consideration. I am willing to risk my life for God, not money, and I would work to safeguard the firm and the client's health, even if I look like a dork in protective gear.

Thank you for your kind consideration. Side note, I have a little bit of the inside scoop since I worked in the largest corporate law firm in DE, the corporate center of the globe. I seek to prevent the man made, unnatural economic crash too.

Stay safe.

Love,
Meg

District Court Exhibit 14

CONFIDENTIAL
MEMORANDUM

TO: Meghan Kelly

FROM: Gregory P. Williams

RE: **Employment Arrangement**

DATE: November 20, 2006

This memorandum outlines the arrangement, which was made concerning your employment with Richards, Layton & Finger, P.A.

The following arrangements have been established for your employment commencing November 20, 2006:

1. You will be subject to the same terms and conditions of employment as all other associates (including quality of work, oversight and annual review), except as set forth below. The Firm's expectation is that you will continue to work billable hours comparable to those worked by other full-time associates in the Business Department. All non-billable work hours should be approved by your assigning director.

2. You will be paid an annual base salary of $135,000. In the future, any adjustments will be made by the Ad Hoc Associate Salary and Bonus Committee.

3. You will not be entitled to bonuses. You may be eligible for bonuses in an amount which will be determined by the Firm.

4. You are not on track for admission to the Firm as a director and you will not be considered for election to the board of directors of the Firm.

5. You will have an assigning director and will generally, other than what is set forth in this memorandum, receive the same benefits as and otherwise be treated in a similar manner as any other associate.

6. These employment arrangements will be reviewed by the Firm on or ~~before June 30 of each year commencing with June 30, 2007, unless such~~ arrangements have been terminated.

7. As with all employees of the Firm, your employment is at-will.

Gregory P. Williams
President
Richards, Layton & Finger, P.A.

11/20/06
Date

Meghan Kelly

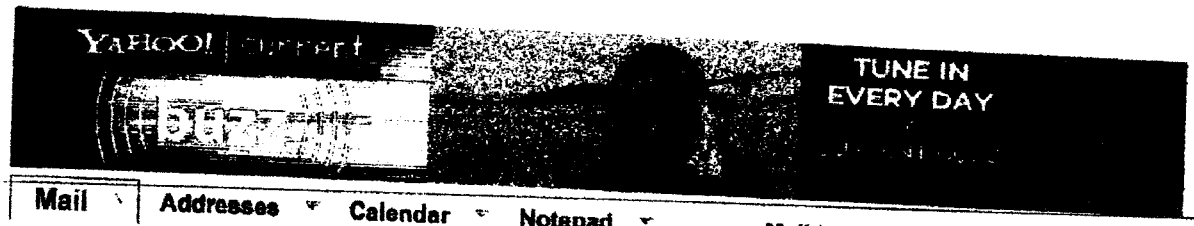
11/20/06
Date

District Court Exhibit 15

Yahoo! My Yahoo! Mail Make Y! your home page Search: Web Search

YAHOO! MAIL Welcome, meghankellyesq [Sign Out, My Account]

Mail Home - Mail Tutorials - Help



Mail | Addresses | Calendar | Notepad | Mail For Mobile - Upgrades - Options

Check Mail | Compose | Search Mail | Search the Web

Get More DVD's with Total Access

Folders [Add - Edit]

- Inbox (117)
- Draft
- Sent
- Bulk [Empty]
- Trash [Empty]

Search Shortcuts

- My Photos
- My Attachments

See your credit score: $0

Open A Chase Account Today!

Find Any Email Address

Free Checking w/direct deposit

Previous | Next | Back to Messages

Call or Instant Message travisnturner

Delete | Reply | Forward | Spam | Move...

This message is not flagged. [Flag Message - Mark as Unread] Printable View

Date: Sun, 13 Aug 2006 10:47:25 -0700 (PDT)

From: "Travis Turner" <travisnturner@yahoo.com> Add to Address Book Add Mobile Alert
Yahoo! DomainKeys has confirmed that this message was sent by yahoo.com. Learn more

Subject: Re: flooded apartment destruction of books

To: "Meg Kelly" <meghankellyesq@yahoo.com>

To whom it may concern:

I am writing at the request of Meghan Kelly. She attended the bar review course at Widener during the same period as I. At no time was she disruptive or anyways even noticeable. In fact, during all the class sessions that I attended (day time sessions), there was no one that acted inappropriately, or even asked a question. I attended at least 90% of the daytime sessions. I can be reached at (610) 506-9825.

Sincerely,
-Travis Turner

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To learn more about how we use your information, see our Privacy Policy

Yahoo! My Yahoo! Mail Make Y! your home page Search: Web Search

YAHOO! MAIL Welcome, meghankellyesq [Sign Out, My Account] Mail Home - Mail Tutorials - Help

NETFLIX Click Here

Mail Addresses Calendar Notepad Mail For Mobile - Mail Upgrades - Options

Check Mail Compose Search Mail Search the Web

$200k for $667/mo
No SSN Required

Folders [Add - Edit]
Inbox (117)
Draft
Sent
Bulk [Empty]
Trash [Empty]

Search Shortcuts
My Photos
My Attachments

What's your credit score $0

Open A Chase Account Today!

Find Any Email Address

Free Checking w/direct deposit

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Delete Reply Forward Spam Move...

This message is not flagged. [Flag Message - Mark as Unread] Printable View

Subject: Note

Date: Mon, 13 Nov 2006 16:46:19 -0500

From: "O'Brien Charles (Courts)" <Charles.O'Brien@state.de.us> Add to Address Book Add Mobile Alert

To: meghankellyesq@yahoo.com

Hi Meghan,

Once again, I don't think you have anything to worry about at all concerning your character interview. Dan and I will write up a note for you. What type of direction would you like the note to have? Dan and I had differing opinions, so I thought I would ask.

Good luck with your interview with Joni tomorrow. I was thinking that since you were interviewing with Joni, and both Dan and I still had applications pending with Richards Layton that it would probably be better not to mention us. Don't want to take any focus off you.

Anyway, You shouldn't worry about the character interview. Good luck and tell Andy we said hi.

Sincerely,
Chip

Charles P. O'Brien
Superior Court Law Clerk
Kent County Resident Judge William L. Witham, Jr.
38 The Green Dover, DE 19901
(302) 739-3184, Ext. 160

November 29, 2006

To Whom it May Concern:

I write on behalf and at the request of Meghan Kelly. I attended the Widener bar review course, which began in May 2006 and ended in July 2006. I met Meghan at the review course, and my brother, Dan O'Brien, and I often sat in the same area as her throughout the duration of the course. During the course, Meghan mentioned the leaky conditions of her dorm room to my brother and I. She was concerned about her ability to adequately study given the conditions of her dwelling. Meghan was in no way disruptive to either of us, nor did she act inappropriately during any classes. To the contrary, she often offered both of us kind words and supportive encouragement concerning the bar experience.

Sincerely,
Chip O'Brien
Dan O'Brien

Yahoo! My Yahoo! Mail Make Y! your home page Search: Web Search

YAHOO! MAIL Welcome, meghankellyesq [Sign Out, My Account] Mail Home - Mail Tutorials - Help



The best card for people with bad credit.

ORCHARD BANK Apply Now

Mail | Addresses | Calendar | Notepad | Mail For Mobile - Mail Upgrades - Options

Check Mail | Compose | Search Mail | Search the Web

Blockbuster. More DVD's, Free Trial!

Folders [Add - Edit]
Inbox (117)
Draft
Sent
Bulk [Empty]
Trash [Empty]

Search Shortcuts
My Photos
My Attachments

What's your credit score $0

Find Any Email Address

Find Any Email Address

Free Checking w/direct deposit

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Delete | Reply | Forward | Spam | Move...

This message is not flagged. [Flag Message - Mark as Unread] Printable View

Subject: RE:

Date: Thu, 9 Nov 2006 09:46:12 -0500

From: "Smith Stephen E (DOJ)" <StephenE.Smith@state.de.us> Add to Address Book Add Mobile Alert

To: "Meg Kelly" <meghankellyesq@yahoo.com>

I'm sorry Meghan, that sounds like an awful experience . . . it also sounds like an experience that is behind you and unlikely to be repeated. Wish I would have gotten this sooner so that I could have responded in a more timely manner.

Part of the character examination process seems to be that interviewers make some huge thing out of a minor past transgression. A fellow in my office was read the riot act about a speeding ticket he picked up in the Arizona desert. He said they made it sound like he was a murderer or something, disregarding traffic laws that way. It does shock me that Fred said things that you found upsetting, but at this stage in life you have probably figured out that your perspective on the world (described by Fred as "honest") can be off-putting to people that don't know you well enough to understand that it is all well-intentioned.

Try not to worry about it . . . if you need to talk I'll be available Friday afternoon (I forgot my cell phone somewhere, and I won't retrieve it till then, and, come to think of it, I can't remember the number. Figures.)

Steve

PS - lots of people are pulling for you.

-----Original Message-----
From: Meg Kelly [mailto:meghankellyesq@yahoo.com]
Sent: Wednesday, November 08, 2006 7:53 PM
To: Smith Stephen E (DOJ)
Subject:

District Court Exhibit 16

DUQUESNE UNIVERSITY
600 FORBES AVENUE • PITTSBURGH, PA • 15282

ENTER FOR LEGAL INFORMATION
TELEPHONE: (412) 396-6188
FAX: (412) 396-6294

ALLEGHENY COUNTY
LAW LIBRARY
TELEPHONE: (412) 350-5353

September 14, 2004

RE: Letter of Reference for Ms. Megan Kelly

To Whom It May Concern:

I have known Ms. Megan Kelly since her first year at the Duquesne University School of Law when she was a student in my Legal Research class. Since then we have kept frequent contact. She has always been in the law library studying. From time to time, she would stop in my office asking questions or discussing issues of her interest.

Ms. Kelly is an exceptionally delightful student. She always has a smile on her face. She is honest and genuine in expressing herself. Her opinions demonstrate her intelligence and thoughtfulness. She is empathetic and sensitive toward other people, and has an unusually keen understanding of human nature and perceptions. Ms. Kelly is diligent and hardworking in pursuing her goals, and conscientious and dedicated in fulfilling her responsibilities.

In short, Ms. Kelly is a hardworking and dedicated law student, a wonderful, charming and intelligent person, and an understanding and supportive fellow human being. She would be an invaluable and positive asset to any working environment in which she will work.

I strongly recommend her to you.

Sincerely yours,

Frank Y. Liu
Director and Professor of Law

STATE OF DELAWARE
LAW LIBRARY - SUSSEX
5 EAST PINE STREET
GEORGETOWN, DELAWARE 19947

TELEPHONE: (302) 856-5483
FACSIMILE: (302) 856-5891

DDS: 02 17 05
SLC: S 985

September 26, 2012

Dear Sir or Madame,

I am the law librarian for Sussex County Law Library and over the last five years one of my most frequent patrons has been Ms. Meghan Kelly, Esq. She has always worked diligently in the law library by researching case law and keeping her legal skills current by reviewing different topics. She shows an unparalleled passion for the law and it is evident by her frequent usage and wide variety of research tools she uses in the law library. Ms. Kelly takes pride in her professional occupation and displays an avid willingness to expand her formidable knowledge base of all areas of legal expertise.

Throughout the years, I have gotten to know Ms. Kelly on a personal as well as professional level. In my personal capacity, I can attest that Ms. Kelly is a very kind and giving individual. She has a bright, friendly personality that can light up a room. Ms. Kelly is an extremely outgoing individual. She would go out of her way to help others and frequently does so. I do not doubt that she displays the same amount of attention, legal expertise, and professional devotion to her clientele. Ms. Kelly would be an asset for any legal firm or organization lucky enough to have her.

If you have any further questions regarding Ms. Kelly's ability or this recommendation, please do not hesitate to contact me using the information on this letterhead.

Respectfully yours,

Leah S. Chandler

Leah s. Chandler
Sussex County Law Library
Law Librarian

Law Office of

MICHAEL R. ABRAM, ESQ.

115 South Bedford Street • Georgetown, DE 19947
302-856-4944 • Fax: 302-856-4946

November 13, 2012

To Whom It May Concern:

It is with great pleasure that I write this recommendation on behalf of Ms. Meghan Kelly. I have known Meghan since 2005 when we worked together at the Law Office of Edward C. Gill. During that time, I assigned several projects to her and I was impressed by her clear and persuasive writing.

Meghan is a hard working, dedicated lawyer. She demonstrates integrity in everything she does. I strongly recommend Meghan Kelly, Esq. for this position. She would be an asset to any employer. Should you have any questions or concerns, please do not hesitate to contact me.

Very truly,

Mike Abram, Esq

November 1, 2010

Dear Miss Bunting,

I have personally known Meghan for fourteen years. Throughout our relationship, there were numerous occasions to witness Meghan's character. Not only is Meghan markedly intelligent and possesses the toughest work ethic I know, she is always concerned with taking care of other people's needs, even before herself. This is what untiringly drives her work effort to 110%. She has always been resourceful as well, using this skill to help others. In addition, Meghan has an innate sense of honesty and integrity in relationships, whether it is for those she serves in a professional capacity, or in a personal friendship.

She also has shown tremendous fortitude and determination in meeting her goal of educating herself as a lawyer and practicing in Delaware. Despite the challenges she had to independently overcome to get to and through law school and beyond, she persevered because her end goal was to help people. She expressed that not many were privileged enough to obtain a law education and therefore help others. She often conveyed this sense of duty that her education should be to help, educate, and enrich the lives of others.

Please understand that you are not considering just another average teaching candidate. You are working with a person imparted by a strong sense from within to work to help others, with specialized gifts and abilities to do so. Her brilliance, and her dogged determination and intense work ethic, tempered by her genuine concern for others and sweet manner, is why I highly recommend Meghan for a position within the field of education. If you should desire to speak with me further, please do not hesitate to reach me on my cellular 302-383-5147.

Sincerely,
Dr. Rebecca R. O'Neill

George Cole

Berkshire Hathaway
Homes Services
33292 Coastal
Hwy. Bethany
Beach, DE 19930

(Home) 29271 Woods Edge Drive
Ocean View, DE 19970
Cell (302)539-1611

RE: Recommendation December 6, 2019

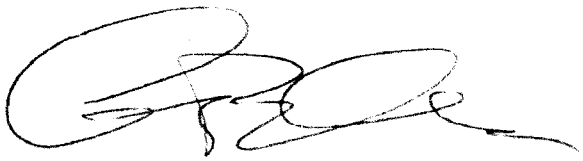
Dear Sirs & Madams,

It is with great pleasure that I write this letter of recommendation on behalf of Meghan Kelly. I have known and interacted with Ms. Kelly for years. She grew up with my children in Sussex County, Delaware. Since her parents live in Florida, I have been available to her as a father figure.

She often stops by my business to discuss important issues in our community. She is trustworthy, hardworking and smart. I have been selling real estate for over 40 years in Delaware. I would be delighted to recommend her as a closing attorney to purchasers of homes.

I strongly recommend her for the position available. Please feel free to give me a call on my cell if you would like any additional information.

Very truly,



KEVIN BROZYNA
DIRECTOR OF OPERATIONS - INSIGHT HOMES
16700 Flatstone Circle
Milton, DE 19968
412-889-7081

January 30, 2015

To Whom It May Concern:

It is with great pleasure and satisfaction that I write this letter of recommendation on behalf of Meghan Kelly. I have known and interacted with Ms. Kelly throughout her tenure with Insight Homes and was grateful for the positive attitude that she brought to the office as well as her unwavering commitment to protecting the company's best interest under all circumstances.

Ms. Kelly's ability to cite and research case law relevant to any matter the company faced was quite impressive. She provided thorough reviews of our contracts and publicly available literature with the intent of limiting our exposure and liabilities. Ms. Kelly's work ethic was unmatched at Insight, and was a great example for other employees.

I strongly recommend Meghan Kelly for this position. She would be an asset to any employer. Should you have any questions, please do not hesitate to contact me.

Very truly,

Kevin Brozyna

ANDREA L. JOHNSON, ESQUIRE
Law Clerk to the Honorable Judge Beauregard and Judge Clark
Sussex County Court of Common Pleas
1 The Circle, Suite 1
Georgetown, Delaware 19947
(302) 858-5758 (phone)
(302) 858-5701 (fax)

October 26, 2012

Dear Sir or Madam:

It is with great pleasure that I write this recommendation on behalf of Meghan Kelly, Esquire. I met Ms. Kelly when I started clerking for the Court of Common Pleas in Sussex County, Delaware. She assists the Honorable Kenneth S. Clark, Jr. of the Court of Common Pleas.

In the short time I have come to know Meghan, I have found her to be intelligent, hardworking and dependable. She goes above and beyond what is required, and she does not hesitate to offer assistance when someone at the court needs an extra hand.

I strongly recommend Meghan Kelly, Esquire for this position. She would be an asset to your Court. Should you have any questions or concerns, please do not hesitate to contact me.

Very truly,

Andrea L. Johnson, Esquire

CAROLYN M. CLARK
3407 Albemarle Avenue
Drexel Hill, PA 19026
(610) 259-4606 (H)
(302) 651-7583 (W)

May 1, 2007

LETTER OF REFERENCE FOR MEGHAN KELLY, ESQUIRE

To Whom It May Concern:

It has been my pleasure to work with Meghan Kelly during her employment in the Alternative Entities Department at the law firm of Richards, Layton & Finger in Wilmington, Delaware.

Although I worked for Meghan for only a short time, I can tell you that Meghan is a dedicated, tireless and enthusiastic worker who comes to work every day with a smile on her face and a cheerful disposition. Meghan pays particular attention to completing her assignments/deals in a timely manner and always meets her deadlines, even if this requires her staying later in the evening. I have always known her to be very professional when dealing with the firm's clients, paying close attention to their needs/requirements. She will not hesitate to confer with more experienced attorneys to gain their insight and experience in pursuit of her legal career.

Meghan is a remarkable young lady with a great eagerness to learn. She is generous of her time and goes out of her way to be helpful, not only to other attorneys, but to the support staff as well. Meghan Kelly would be a great asset to any prospective employer.

Carolyn C. Clark
Carolyn Clark

Georgetown Elementary School

Indian River School District
301A West Market Street
Georgetown, Delaware 19947
(302) 856-1940
Fax (302) 855-2479
www.ge.irsd.k12.de.us

Neil Stong, Principal
Ivan Neal, Assistant Principal

Jane Brock, Secretary
Patti Jo Johnson, Secretary

June 13, 2012

To Whom It May Concern,

This letter is written to recommend Miss Meghan Kelly for a teaching position in the Indian River School District. I have had the opportunity to work with Miss Kelly during the 2012-2013 school year. Miss Kelly worked as a substitute teacher in our school and has completed her assigned tasks with competence and a caring attitude towards our students. She has established herself as a reliable substitute teacher that always carries out her assignments.

Miss Kelly works tirelessly to perform her duties without complaint. She has taken on several responsibilities such as assisting students in learning tasks, supporting regular education teachers in TAM classrooms and performing other assigned tasks that require supervision of students.

Miss Kelly is conscientious in her approach to her work and the students and staff at Georgetown Elementary. Meghan is courteous and patient with those she works with and is always willing to do what is best for the school and students.

Thank you for your consideration in this matter.

Sincerely,

Neil Stong
Principal

The Indian River School District is an Equal Opportunity Employer and does not discriminate or deny services on the basis of race, color, national origin, sex, disability, or age in its programs and activities.

DAWN R. SMART
4152 HORSESHOE ROAD
SEAFORD, DE 19973
302-629-7543

August 16, 2001

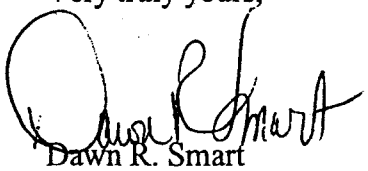
RE: LETTER OF REFERENCE FOR MEGHAN KELLY

To Whom It May Concern:

It is with great pleasure that I am able to provide this letter on behalf of Meghan Kelly. I have had the opportunity to work with Meghan at the law office of D. Stephen Parsons, P.A. Even though the time I worked with Meghan was short, she displayed honesty, integrity and pride in every aspect of her duties. In my opinion, Meghan is a very intelligent and courteous young woman. Anytime I have needed help with anything, she has been right there willing to lend a hand. She is truly a person who will succeed at anything because of her natural intelligence and determination.

Please do not hesitate to contact me if you would like to speak further regarding this individual.

Very truly yours,



Dawn R. Smart

Star Windsor
P.O. Box 1061
Selbyville, DE 19975

August 8, 2001

To Whom It May Concern:,

I'm pleased to tell you about Meghan Kelly, whom I have had the pleasure of closely working with this summer at the law office of D. Stephen Parsons, P.A.

Meghan has substantial "people" skills. She is always warm and welcoming to all.

In the short time I have come to know Meghan, I have found her to be dependable and hard working. After a full day at the law office, she continues to provide for herself with a second job. Meghan has always presented herself in a positive and outstanding manner . She has done an admirable job preparing herself for life. This young lady has a great eagerness to learn; and I know she will go far.

In short, I heartily recommend Meghan Kelly to you for her ability to deal with people and her energetic approach to dealing with life's vagaries.

Sincerely,

Star Windsor

Star Windsor

February 21, 2001

Law School Admission Council
P.O. Box 8508
661 Penn Street
Newtown, Pa. 18940-8508

Sirs:

I am writing this letter to endorse Meghan Kelly' application to attend law school.

I have known the Kelly family for 13 years, as we reside in the same neighborhood. The family as a whole and Meghan in particular are outstanding individuals, with strong values. These values have been instilled in Meghan.

I have watcher her grow into a vital, intelligent young woman, who has a great deal to offer, in whatever field she chooses to enter. It is no surprise to me that she has chosen to enter the challenging field of law.

I am a lieutenant with the Delaware State Police. Meghan has shown a great deal of interest in this field over the years. Many times she has asked for an explanation or perspective concerning legal matters in the news. She is bright, inquisitive, and has an honest desire to serve society.

Meghan grew up with my oldest daughter, and she and her family have spent countless hours with our family. You will find her to be the type of student who will throw herself into this course of study, and in turn, use this degree to work toward bettering society. I highly recommend her admission into law school.

Sincerely,
Lt. George R. Chamberlin
Lt. George R. Chamberlin
Delaware State Police
Troop 5
Bridgeville, Delaware 19933

District Court Exhibit 17

IN THE SUPREME COURT OF THE STATE OF DELAWARE

642 , 2006

PRO SE
()

MEGHAN KELLY, ESQUIRE,
Petitioner Below,
Appellant,
v.

C. J. SEITZ

BOARD OF BAR EXAMINERS,
Respondent Below,
Appellee.

DF $ 00.00

2006

1	Dec	11	Notice of appeal from the Order dated 11/17/06 from the Board of Bar Examiners of the State of Delaware. (served by hand 12/11/06)(clh)
2	Dec	11	Notice to show cause issued to appellant. The Board is directed to file an answer 10 days from service of the response. (clh)
3	Dec	12	Notice of voluntary dismissal by appellant. (service shown) (mfm)
4	Dec	14	Certified copy of notice of voluntary dismissal dated 12/12/06 to Board of Bar Examiners. Case closed. (afb)

d 1
c Cert
Check destroyed
12-13-06
c

MEGHAN KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089
meghankellyesq@yahoo.com

642, 2006

2006 DEC 11 A 8:50

RE: Letter of intent to appeal

Respectfully request a writ of mandamus

December 8, 2006

Dear Honorable Court:

Under Delaware law, I have fifteen business days to appeal a decision from the Board of Bar Examiners and I am exercising that right in a timely manner.

I am appealing the attached decision from the Board of Bar Examiners, which was received Saturday November 18, 2006. Please note that the Courts were closed on Thanksgiving and Black Friday.

The Board of Bar Examiners made a decision to defer their decision on whether I should practice law pending a psychological evaluation. In addition, they decided that, even after they received an evaluation, that they could further defer their decision on my bar admission pending "further investigation."

I am appealing the decision in toto and also in so far as the Board has carved out the right to prolong their decision to a later date. I am concerned that the Board will defer their decision indefinitely.

I have done what the Board has requested. I have obtained an appointment with a psychiatrist despite the fact that many psychiatrists and psychologists in Delaware could not fit me in on such short notice during the holiday season.

Additionally, I underwent a psychological evaluation of my own volition prior to the Board's request. I enclosed both of these psychological evaluations for your review. As you can see two professionals recommended my admittance to the bar, one of whom is the State of Delaware's psychiatrist, Dr. Cuba.

In the Board's decision they explained that they would contact me "[o]nce the Board has received the professional report." The Board received an evaluation over a week ago and no one has contacted me concerning the decision.

I am barred in good standing in Pennsylvania. I have passed the Delaware Boards. Mr. Iobst said that my application contained excellent letters of recommendation from a professor, employers and peers. Additionally, the Board has received two expert opinions on my fitness to practice law. The Board has enough information to make a decision. I respectably request this Honorable Court to require the Board to make a decision with due diligence.

I will face irreparable damage if I am not barred in a timely manner and I will be prejudiced if the Board continues to defer their decision. The holiday season may also cause delay.

I will lose an opportunity of a lifetime if the Board continues to defer their decision or denies my admittance. On November 20, 2006, I began a career as an associate for Richards Layton & Finger. I am working with some of the most influential corporate attorneys in Delaware. For instance, I share a secretary with an individual who participated in drafting some of Delaware's corporate law, Paul Altman, Esquire.

I am learning from some of the finest attorneys. My situation with the firm is an opportunity of a lifetime.

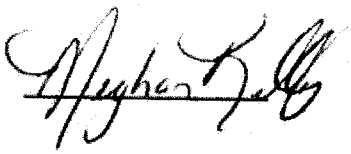
I have informed the appropriate member of my firm that there may be complications with my bar licensure which may not be resolved in time for admission. My employer knows that my admission may be deferred, but has not asked about the details of my situation and I wish to keep them confidential as required by Delaware rules.

My employer has granted me a grace period to get barred. I have until the January 2006 ceremony to get admitted, and I will be responsible for arranging my preceptor's attendance.

I respectfully request that the Court require the Board to make a decision.

Thank you,

Meghan Kelly



BOARD OF BAR EXAMINERS
OF THE SUPREME COURT OF DELAWARE

REPLY TO: P.O. Box 2207
Wilmington, DE 19899
(302) 888-6278

November 17, 2006

Personal and Confidential
Certified Mail - Return Receipt Requested

Ms. Meghan M. Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

Re: Character and Fitness Investigation

Dear Ms. Kelly:

In addition to achieving a passing score on the written portion of the Delaware Bar Examination, Supreme Court of Delaware Rule 52 requires that the Board conduct an investigation into an applicant's character and fitness for the practice of law.

A review committee of the Board of Bar Examiners of the Supreme Court of Delaware has considered your application and has decided to defer a decision on your admission at this time pending a further investigation. To assist the Board with its continuing character and fitness inquiry, the Board requires that you be evaluated by a Delaware-licensed psychologist or psychiatrist, who must perform an assessment and prepare a report to the Board expressing an opinion on your ability to accept the responsibilities and to perform the duties required of a member of the Delaware Bar. Under the Court's and the Board's Rules, you will be required to pay for all expenses of this evaluation and any follow up recommended by the professional.

As soon as you have selected a professional, please inform Fred Iobst, Esquire, who will continue to supervise the character and fitness investigation. Once the Board has received the professional's report, we will notify you of the Board's character and fitness determination, or whether further investigation is required. In the meantime, if you have any questions, please feel free to give me a call.

Very truly yours,

Collins J. Seitz, Jr.
Chair, Board of Bar Examiners

CJS,Jr./saj

DELAWARE HEALTH AND SOCIAL SERVICES

DIVISION OF SUBSTANCE ABUSE AND MENTAL HEALTH

COMMUNITY MENTAL HEALTH SERVICES

November 17, 2006

Meghan Kelly
D.O.B. 1/19/1978

Patient contacted Crisis at 11:00am and spoke with the undersigned staff member, expressing concerns over her recent conduct in the oral interview phase to obtain her Delaware license to practice law. Patient reported during this interview she broke down and cried, and fears she did not leave a favorable impression with the interviewer. Patient reports that she is licensed to practice law in Pennsylvania and is to start work with a large law firm in Wilmington on Monday the 20th. Patient is concerned that her poor performance during the interview process may hurt her chances of obtaining this position. During the course of the telephone call patient asked if she could come in and speak to some one about this issue and so she was provided an appointment for 3:00pm.

Patient presented for the scheduled appointment on time. She was well dressed and groomed in a business suite. Patient affect was bright, smiling, good eye contact, laughter and speech appropriate and oriented x3.

Patient is a 28 year old, white, single female, raised in an intact family. Patient reports she is the middle child with an older sister and younger brother with whom she has a close relationship. Patient reports her father is a teacher and coach and her mother is a pharmacist with a local pharmacy chain. Patient reports having a close and supportive family in which church, education and sports played a big role in her up bringing. Patient reports playing sports throughout her school career and graduating with a high GPA from High school, college and Law School. Patient reports an active and healthy social life filled with friends and activities and has maintained several long-term relationships.

Patient reports no family history of substance abuse or mental illness. Patient reports having a surgery at age 17 to remove one fallopian tube, which caused her to miss several weeks of school. She reports she did well with the surgery and there are no long-term effects. Patient also reports the loss of a cousin in 2004 due to murder. No other medical history or traumatic events were noted.

Clinical Impression: Ms. Kelly, is a well-adjusted and intelligent young woman, who appears to be very honest and out going with high moral values. Religion has played a big role in her life and family up bringing and as such she displays very positive, caring and compassionate traits. These traits are present in her presentation and interactions with others and may be perceived as her being immature or naive. There were no signs or symptoms of mental illness noted during this interview and no need for treatment noted. I believe that Ms. Kelly will be successful in her pursuit for a career in law, and will benefit from the mentoring program offered by the law firm recruiting her at this time.

David M. Ciamaricone MS, LPCMH
Senior Social Service Administrator
Crisis Intervention Service
14 Central Avenue
New Castle, De. 19720
302-577-2484

DELAWARE HEALTH
AND SOCIAL SERVICES
DIVISION OF SUBSTANCE ABUSE
AND MENTAL HEALTH

COMMUNITY
MENTAL HEALTH SERVICES

December 4, 2006

Mr. Collins J. Seitz, Jr.
Chair, Board of Bar Examiners

I interviewed Ms. Meghan Kelly on December 1, 2006 for the purpose of a psychiatric evaluation. She said she feels that she had left an unfavorable impression during the Board of Law interview and expressed concern that she may not get her license, which can jeopardize her being hired at the corporate job she was to start on December 20. She explained that she was unable to prevent herself from crying, when asked a question by a board member.

She was born and raised by cohesive family. Her father is a teacher and coach and her mother is s pharmacist working in a local drugstore. She has an older sister and a "baby" brother. She describes her family as fairly close and supportive.

Megan is a 28-year-old single female who arrives promptly for her appointment. She was neatly dressed in a dark business suit. She was carrying a portfolio and a pocket book. She explained that she came from work and had to carry documents she is working on She was pleasant and very cooperative. Her affective responses are reactive and appropriate to her thought contents. She was a bit anxious during the initial phase of the interview obviously consumed by her preoccupation of presenting a good impression to the detriment of losing the points of a question. She quickly realized the problem and calmed herself down, talking more slowly and paying closer attention to questions before giving an answer

Her speech was coherent, logical and goal directed. No delusional thinking elicited, she denied ever having hallucinations. No evidence of dissociative states was noted.

I do not, at the present, find a diagnosable illness in Ms. Kelly nor are there any indication of a serious personality disorder that could interfere with her functions as a lawyer.

Sincerely,

Dr. Ernesto Cuba, MD
Fernhook Community Mental Health
(302) 255-9457

PROJECT DESIGN CONSULTANTS | 701 B Street, Suite 800 San Diego, CA 92101 | 619.235.6471 tel 619.234.0349 fax | www.projectdesign.com

December 6, 2006

SUBJECT: Meghan Kelly

To Whom It May Concern:

Meghan Kelly is capable of practicing law. She is intelligent, focused, and hard working. Given any task, she is driven to complete it with the utmost determination. This is proven by her graduation from Duquesne University and passing both the Delaware and Pennsylvania professional board examinations. Meghan has the tested ability to be an excellent attorney.

As a sister, Meghan has always been a confidant and a guide. With any problem that I encounter in life, she answers with a compassionate yet realistic solution. Meghan is programmed to solve problems. This quality is the primary characteristic among any profession.

Any concern for her professional ability should be suspended until proven in a professional scenario. To predetermine anyone's future as bright as hers would be an offense to the law profession.

If you have any questions, please contact me.

Sincerely,

Andrew Kelly
Engineer-in-Training
858-610-5266

SAN DIEGO • PHOENIX • TEMECULA • BAKERSFIELD

December 2, 2006

To Whom It May Concern,

My name is Amanda Gordines.

This is a reference letter about my sister, Meghan Kelly. She is a hard working young lady. Meg will be a great asset as to any company that she may work for. She will be an incredible lawyer.

Ms. Kelly has worked hard and put herself through law school. She has passed both the Delaware and Pennsylvania bar exam. This is quite an accomplishment.

Meghan will make a great lawyer and uphold the law.

We are blessed to have come from a hard working family who has set wonderful examples for us. Our elders have supported the community with their teaching, nursing, coaching, pharmaceutical knowledge and knowledge of the law.

Given the chance, Meghan will bless the community as much as her family has.

Meghan will be able to help may people with her knowledge. She has worked hard to put herself through law school. Give her the chance to be all that she can be.

Sincerely Yours,

Amanda Gordines

Dr Rebecca O'Neill

To Whom It May Concern:

I have personally known Meghan for over ten years. Throughout our relationship, there were numerous occasions to witness Meghan's character. Not only is Meghan markedly intelligent and possesses the toughest work ethic I know, she is always concerned with taking care of other people's needs before herself.

She operates on the principles of personal responsibility and accountability. In fact, if she is responsible, Meghan will deliver what she promised or if mistakenly, she were the party held accountable for a misaction or inaction, Meghan would be the first to admit and amend with more than appropriate corrections.

This highly developed sense of obligation is what makes Meghan the most driven person I know to help people and take care of them, making absolute sure that they receive what is just and with compassionate treatment. She has always been focused on doing what is right in relationships, whether it is for those she serves in friendships or professional relationships.

Not only does this show immense strength in integrity, but she also has shown tremendous fortitude in meeting her goal of educating herself so she could practice as a lawyer. Meghan believed in herself and despite all the challenges she had to single-handedly and quite independently overcome to get to and through law school, she persevered because her end goal was to help people. She didn't just do this to have a respectable job. She set out to accomplish her goal since she knew not many others were privileged enough to obtain the education to uphold the law for those in need. Meghan accomplished her education starting only with the raw materials of dogged determination and brilliance.

Please understand that you are not dealing with just another average law school graduate. You are dealing with a person imparted by a strong sense from within to help others, with the gifts and abilities to do so. I'm sure many others before Meghan, so similar yet so different from her, never *actually* felt and listened to this calling. This is what places Meghan apart from others and transforms her into an incredibly desirable resource. If you should desire to speak with me further, please don't hesitate to reach me at work on my cell 814-329-1142 or at home at 814-942-4279.

Sincerely,

Dr. Rebecca R. O'Neill

CERTIFICATE OF SERVICE

I, Meghan Marie Kelly hereby certify that two copies of the Appeal were served by hand delivery/first class mail [circle the appropriate choice] on this 11th day of December, 2006 upon the following person(s): Collins J. Seitz, Chair of the Board of Bar Examiners.

Date: December 10, 2006 /s/ Meghan M. Kelly

#2

IN THE SUPREME COURT OF THE STATE OF DELAWARE

MEGHAN KELLY, Petitioner Below, Appellant, v. BOARD OF BAR EXAMINERS, OF THE STATE OF DELAWARE, Respondent Below, Appellee.	§	No. 642, 2006

DELAWARE SUPREME COURT
FILED
2006 DEC 11 P 5H
CLERK
DOVER

NOTICE TO SHOW CAUSE

TO: Ms. Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

You are directed to Show Cause why this appeal should not be dismissed pursuant to Supreme Court Rule 29(b) for your failure to comply with Rule 42 when taking an appeal from an apparent interlocutory order. Please respond in writing to this notice to show cause within 10 days after you receive it. If you do not respond, dismissal of this appeal shall be deemed to be unopposed.

The Board is directed to file an answer to the appellant's response within 10 days of service.

Date: December 11, 2006

Cathy L. Howard
Clerk of the Supreme Court

cc: Collins J. Seitz, Jr., Esquire

bc: Chief Justice Steele
Justice Holland
Justice Berger
Justice Jacobs
Justice Ridgely

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
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Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees
Postmark Here
Sent To
Meghan Kelly
Street, Apt. No.; or PO Box No.
34012 Shawnee Drive
City, State, ZIP+4
Dagsboro, DE 19939
7005 3110 0000 5270 9983
CERTIFIED MAIL
SENDER: COMPLETE THIS SECTION
Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.
1. Article Addressed to:
Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
4 6 Yd, 2006
A. Signature
X
Agent
Addressee
B. Received by (Printed Name)
C. Date of Delivery
D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No
3. Service Type
Certified Mail
Express Mail
Registered
Return Receipt for Merchandise
Insured Mail
C.O.D.
4. Restricted Delivery? (Extra Fee) Yes
2. Article Number
(Transfer from service label)
7005 3110 0000 5270 9983

642-2006 3

MEGHAN KELLY, ESQUIRE

HomeAddress:
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089
meghankellyesq@yahoo.com

Work Address
One Rodney Square
20 North King Street
Wilmington, DE 19801

DELAWARE SUPREME COURT
FILED
2006 DEC 12 P 12:57
DEPUTY CLERK
WILMINGTON

December 12, 2006

Attn: Cathy L. Howard
Delaware Supreme Court
Carvel State Office Building
820 North French Street, 11th Floor
Wilmington, DE 19801

RE: # 642-2006

Dear Ms. Howard:

I do hereby withdraw and voluntarily dismiss any appeal initiated by my letter dated December 8, 2006. A copy of this notice has been served by hand on the Chair of the Board of Bar Examiners. I apologize for any inconvenience caused to this Honorable Court or the Board of Bar Examiners as the result of my letter.

Respectfully,

Meghan Kelly, Esquire

Meghan Kelly

CC: Collins J. Seitz, Jr. Esquire
William J. Wade, Esquire

IN THE SUPREME COURT OF THE STATE OF DELAWARE

MEGHAN KELLY	§	
	§	No. 642, 2006
v.	§	
	§	
BOARD OF BAR EXAMINERS OF THE DELAWARE SUPREME COURT	§	Board of Bar Examiners
	§	

The following docket entry has been made in the above cause.

4. December 14, 2006. Certified copy of notice of voluntary dismissal dated December 12, 2006, to Board of Bar Examiners. Case closed.

DELAWARE SUPREME COURT
FILED
2006 DEC 14 P 12:13
CLERK
DOVER

cc: Meghan Kelly, Esquire
Collins J. Seitz, Esquire

Date: December 14, 2006.

Audrey F. Bacino, Assistant Clerk
of the Supreme Court

STATE OF DELAWARE }
} **ss.**
KENT COUNTY }

I, Audrey F. Bacino, Assistant Clerk of the Supreme Court of the State of Delaware, do hereby certify that the foregoing is a true and correct copy of the notice of voluntary dismissal dated December 12, 2006, in ***Meghan Kelly v. Board of Bar Examiners,*** No. 642, 2006, as it remains on file and of record in said Court.

IN TESTIMONY WHEREOF,

I have hereunto set my hand and affixed the seal of said Court at Dover this 14th day of December A.D. 2006.

Audrey F. Bacino
Assistant Clerk of Supreme Court

District Court Exhibit 18

Board of Bar Examiners
of the Delaware Supreme Court

March 29, 2007

Reply to: P.O. Box 391
Wilmington, DE 19899-0391
(302) 571-6643

PERSONAL & CONFIDENTIAL
DELIVERED VIA HAND

William J. Wade, Esquire
Richards, Layton & Finger, P.A.
One Rodney Square
920 North King Street
Wilmington, DE 19801

Re: Meghan M. Kelly

Dear Bill:

This letter follows our telephone conversation on March 27, 2007. As advised, the Board of Bar Examiners has determined (in reliance upon the recent evaluation and recommendations of Dr. Timothy Michals) that Meghan Kelly pursue a course of counseling to address issues concerning her fitness to practice law. We have arranged for counseling to commence with Esther V. Weiss, M.A., C.R.C., C.C.M., CEC Associates, Incorporated, beginning as soon as the week of April 9, 2007. Ms. Weiss is located at The Commons at Valley Forge, PMB 23, Unit #9, Valley Forge, PA (Telephone: 610-935-7560.) Her resume is attached.

The course of counseling will depend, of course, upon Miss Kelly's cooperation and progress, but it is expected that counseling will continue for approximately six months (initially at once per week sessions). It is important for Miss Kelly to understand that Ms. Weiss will not provide her notes or a verbal report of the counseling sessions to members of the Board of Bar Examiners. Both Ms. Weiss and the Board believe that a confidential relationship between Miss Kelly and her counselor is important to a positive counseling outcome. The Board will only be given periodic updates from Ms. Weiss acknowledging that Miss Kelly has attended her scheduled appointments and that she is cooperating and working toward the goals of the counseling.

At the end of the counseling period, Ms. Weiss will report to Dr. Michals (again, not providing him with the actual progress notes), and a second evaluation/meeting of Miss Kelly with Dr. Michals will be scheduled. At that point it is expected that Dr. Michals will issue a second report concerning Miss Kelly, and thereafter the Board will promptly report its decision to Miss Kelly regarding her application for admission to the Bar of the Supreme Court of Delaware.

I will be contacting you shortly to arrange a short meeting with you and Miss Kelly to discuss this subject further. Any questions that you or Miss Kelly may have can be addressed at that time.

Very truly yours,

Fred Iobst

Frederick W. Iobst
Vice-Chair, Board of Bar Examiners

FWI:ms

cc: Edward C. Gill, Esquire, Preceptor
Donald E. Reid, Esquire, Chair, Board of Bar Examiners
Richard G. Andrews, Esquire, Member, Board of Bar Examiners
P. Clarkson Collins, Jr., Esquire, Member, Board of Bar Examiners
Ms. Sarah Arnold, Executive Director, Board of Bar Examiners

District Court Exhibit 20

Dreaming of the perfect wedding
FOR TIPS, TRENDS, IDEAS, LOCAL VENDORS AND MORE, CLICK HERE. post-gaze

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Walsh
Zanos
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Post Your Problems
Helping you with consumer questions. Cutting through red tape.



Lawrence Walsh: Rat is unwelcome study partner

Wednesday, June 29, 2005

By Lawrence Walsh, Post-Gazette Staff Writer

A pregnant rat running between your legs in your bedroom isn't conducive to studying for final exams.

That's what Meghan Kelly said happened to her in early May in her 10th-floor apartment in Brottier Hall at Duquesne University. The 20-story building was formerly known as Citiline Towers and the Cricklewood Hill Apartments.

"I haven't been able to get a good night's sleep since it happened," said Kelly, a law school graduate now studying for the bar exam next month.

She said the rat ran under a bed and into a hole beside the heating and air-conditioning unit in a bedroom.

Kelly notified the university. The university sent an exterminating company to inspect her room. It found no evidence the rat had taken up residence in the apartment, but it put out traps to capture any transient rodents.

Then Kelly found a baby rat in a trap. She again called the university. The exterminator returned for another inspection, but found no signs that mama rat had made herself at home. They again set out traps.

After successfully passing her law school exams last month, Kelly began studying for the bar exam. Law school graduates must pass the two-day test to obtain a license to practice law in Pennsylvania.

Unnerved by her encounter with the pregnant rat, Kelly said she tried to

sleep as best she could. She initially thought a tapping sound she heard next to the head of her bed came from a heating and cooling unit. Then she thought it might be a rat trying to get out.

She called the Allegheny County Health Department. She also contacted the Pittsburgh Post-Gazette.

Dennis Lauria, a county environmental health specialist, inspected her apartment last Tuesday. He ordered the university to place rat glue traps under the heating and cooling units in each room. The traps are designed to trap rodents by attracting them to the sticky surfaces that prevent them from moving after they step on them.

Lauria also ordered the university to repair a hole in the ceiling of a hallway closet in Kelly's apartment. Although he found no evidence of rodents in her unit, he found some on the ground level of the building.

He found "rodent droppings, carcasses, rub marks, chewed areas or burrows" in the garage. He also noticed that rodents could crawl under the closed garage doors. He ordered the university to "rodent-proof the garage doors" and to "remove food sources, harborage areas and eliminate entries."

Lauria also said the garbage storage area had garbage on the floor. He ordered that it be cleaned up and that bait stations be placed in the garbage storage and receiving areas. He found rat ground burrows about 20 feet from the two garage doors, one of which is open during the day to provide egress and ingress for employees and workers renovating the building.

At Kelly's invitation, I accompanied Lauria on a reinspection of her apartment yesterday. He found mouse droppings and mouse hair on a glue trap under one of her heating and cooling units. "I'll add that to my report," he said.

During a reinspection of the ground level of the building, Lauria said building employees had done a lot of clean-up work since his first visit. There was no garbage on the floor of the garbage receiving and storage areas. But at least one rat had entered the garage. Visible evidence of its presence was near a trap that had been sprung.

Although Lauria gave the university until July 12 to comply with the orders he issued last week, he said employees already had corrected most of them.

He was impressed with the steel strips attached to the bottom of one of the garage doors to keep out four-legged trespassers.

"We take this matter very seriously," said Bridget Fare, a university spokeswoman. "We started addressing it the day after [Kelly] notified

District Court Exhibit 22

Re: CONFIDENTIAL - ODC FILE NO. 115327-B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: renee.buskirk@delaware.gov

Cc: jzingaro@peoplesplace2.com; patricia.schwartz@delaware.gov; darin.mccann@coastalpoint.com; grolfe@newszap.com; david.weiss@usdoj.gov

Date: Monday, August 23, 2021, 10:51 AM EDT

Desist in contacting me to interfere in my case.

No, I will not be evaluated. I have religious opposition to mental health and healthcare. Do not interfere with my case any further. I am trying to file a writ of cert as we speak.

Stop impeding justice, to bend my freedom of conscious to your will. My belief in Jesus may appear to be crazy to you, but my freedom to believe as I choose is a protected right, same as they right to an unobstructed trial.

Desist in contacting me.

Meg

On Monday, August 23, 2021, 09:53:23 AM EDT, Buskirk, Renee (Courts) <renee.buskirk@delaware.gov> wrote:

Ms. Kelly:

Please see the attached (1) from Disciplinary Counsel Patricia Bartley Schwartz regarding the above-referenced subject matter.

Please confirm receipt.

Thank you.

Renee Buskirk

Paralegal

Office of Disciplinary Counsel

The Renaissance Centre

405 North King Street, Suite 420

Wilmington, DE 19801

(302) 651-3931

District Court Exhibit 23



Search documents in this case: Search

No. 21-5522

Title:	**Meghan Kelly, Petitioner** **v.** **Donald J. Trump**
Docketed:	August 30, 2021
Lower Ct:	Supreme Court of Delaware
Case Numbers:	(119, 2021)
Decision Date:	July 7, 2021
Rehearing Denied:	July 19, 2021

DATE	PROCEEDINGS AND ORDERS
Aug 23 2021	Petition for a writ of certiorari and motion for leave to proceed in forma pauperis filed. (Response due September 29, 2021) **Motion for Leave to Proceed in Forma Pauperis** **Petition** **Petition Appendix** **Petition Appendix** **Motion for Leave to Proceed in Forma Pauperis Proof of Service** **Certificate of Word Count** **Appendix** **Appendix**
Sep 23 2021	Waiver of Meghan Kelly of right to respond not accepted for filing. (September 23, 2021)
Oct 14 2021	DISTRIBUTED for Conference of 10/29/2021.

District Court Exhibit 24

DESIST IN DUE PROCESS VIOLATION? FIRST AMENDMENT FREE EXERCUISE RELIGIOUS ASSOCIATION AND FR CONFIDENTIAL - ODC FILE NO. 115327-B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: renee.buskirk@delaware.gov

Cc: jzingaro@peoplesplace2.com; patricia.schwartz@delaware.gov; darin.mccann@coastalpoint.com; grolfe@newszap.com; matthewkosiorek@comcast.net; mbraden@bakerlaw.com; mckayla.braden@gmail.com; iadams@sidley.com; tmastro@gmail.com; jday1632@gmail.com; christopher.johnson@gmail.com; wchandler@wsgr.com; president@duq.edu; geobcole@vetizon.net; chris.calio@yahoo.com; cbarrish@whyy.org; meghankellyesq@yahoo.com

Date: Saturday, August 28, 2021, 04:45 PM EDT

Ms. Swartz, Mr. Zingaro and Ms. Burskirk,

This email is to confirm, I will not be evaluated, as such evaluations violate my religious beliefs. I alerted the US Supreme Court to the same in my petition for writ of cert, relating to emotional damages related to the President's conduct.

Desist impeding in my right to access to the courts without government obstruction and retaliation for exercise of my first Amendment rights. I am an injured party, not an attorney practicing law in this case.

A court staff member sought to sabotage my case by misleading me to almost miss the filing deadline to appeal the Master's final report, dated November 2, 2020.

That same staff member instructed me to cross off the civil process clerk's address on a praecipe to impede the case from going forward. That member objects to my religious association beliefs in support of Trump and government agents exercise of religion while governing.

Judge Clark also sought to interfere with my case. Government and court attacks against a party in an active case to impede justice, based on my case, is inappropriate and unlawful.

I do not seek disciplinary recourse at this time should this arm of the Supreme Court and other members of the government refrain from persecuting me based solely on exercise of my Constitutional rights based on religion, association or poverty.

Thank you,

Meg Kelly

On Monday, August 23, 2021, 09:53:23 AM EDT, Buskirk, Renee (Courts) <renee.buskirk@delaware.gov> wrote:

Ms. Kelly:

Please see the attached (1) from Disciplinary Counsel Patricia Bartley Schwartz regarding the above-referenced subject matter.

Please confirm receipt.

District Court Exhibit 25

CONFIDENTIAL ODC FILE No. 115327-B

From: James, Angela D (Courts) (angela.james@delaware.gov)

To: meghankellyesq@yahoo.com

Cc: patricia.schwartz@delaware.gov; renee.buskirk@delaware.gov

Date: Monday, September 27, 2021, 12:47 PM EDT

Dear Mrs. Kelly;

Attached, please find a copy of the letter from Patricia Bartley Schwartz, Esquire regarding the above-captioned matter which the original has been mailed to you via U.S. First Class Mail.

Thank you.

Angela James

Paralegal

Office of Disciplinary Counsel

The Renaissance Centre

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Office of Disciplinary Counsel
SUPREME COURT OF THE STATE OF DELAWARE

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DAVID A. WHITE
Chief Disciplinary Counsel

PATRICIA BARTLEY SCHWARTZ
Disciplinary Counsel

KATHLEEN M. VAVALA
Disciplinary Counsel

September 27, 2021

CONFIDENTIAL
VIA EMAIL & U.S. MAIL
Meghankellyesq@yahoo.com
Meghan M. Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939

RE: ODC File No. 115327-B (Meghan M. Kelly, Esquire)

Dear Ms. Kelly:

By letter dated August 23, 2021, this Office advised you of its concerns regarding your fitness to practice law. As such, the Office of Disciplinary Counsel requested you voluntarily submit to an examination with Joseph C. Zingaro, Ph.D. You declined and the examination has been canceled.

I am writing to notify you, pursuant to Procedural Rules 9(b) and 19(c) of the Delaware Lawyers' Rules of Disciplinary Procedure, that on **Wednesday, November 3, 2021**, this Office will present to a panel of the Preliminary Review Committee ("PRC") a petition to transfer you to disability inactive.

You may, if you choose to do so, send a written statement to this Office for submission to the PRC. Any such written statement must be received by this Office no later than the close of business on Tuesday, October 26, 2021. If we do not receive your

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submission by the deadline, it will not be sent to the PRC in advance. This matter is serious, and you should consider retaining counsel.

Sincerely,
/s/ Patricia Bartley Schwartz
Patricia Bartley Schwartz

PBS:aj