

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

J.G.G. et al.,	)	Case No. 1:25-cv-766 (JEB)
Plaintiff,	)	
v.	)	
DONALD J. TRUMP, in his official	)	
capacity as President of the United	)	
States, et al.,.	)	
Defendant.	)	

Amicus Petitioner Meghan Kelly’s Motion for permission to serve the parties and the Court by Email, and Motion for permission to file by PACER if required to submit documents

Comes now Amicus Petitioner Meghan Kelly, respectfully moves the Court to grant her permission to serve the parties by email, and if required permission to serve the Court and the party by PACER. She incorporates all filings submitted herewith incorporated herein, especially the petition to file amicus, an exemption from pro hac vice rules and permission to file in forma pauperis with an exemption from costs. She avers as follows:

1. Amicus Petitioner Meghan Kelly brings this Motion for an exemption from the normal requirement to serve the parties and the court via PACER or US Mail for permission to serve the parties and the Court via electronically by email, due to costs relating to printing, mailing and transporting pleadings to the Post Office or the Court, creating a substantial burden upon my access to the courts to defend the right to a fair and impartial forum due to poverty and religious objections to debt that would foreclose any 1<sup>st</sup> Amendment right to petition without an accommodation unfairly in contravention of 5<sup>th</sup> Amendment Due Process, and due to the immediacy of the petition which may be rendered too late should normal mail or PACER be requirements place an obstacle to deny me access to the courts for mere permission to file, even if the permission is rejected. US Amend I, V, FRCP 5. It is the mere request to docket the items for consideration, not the grant of relief therein which I understand is discretionary that I seek to protect.

**RECEIVED**  
APR 21 2025  
Clerk, U.S. District & Bankruptcy  
Court for the District of Columbia

2. The First Amendment right to petition is the most fundamental right necessary to safeguard our civilized form of government from human sacrifice of life and liberties unrestrained by reign by mob rule through the vote, by might like a mobster through the executive branch through misuse of might, or threat of the purse strings as Speaker of the House, Mike Johnson threatened recently in contravention of the 5<sup>th</sup> Amendment Equal Protections' component, and due process before vitiation of claimants' right to access to the courts by eliminating or threatening the court or judge who Art I and Art II members disagree with, specifically the Judge presiding over this forum as applied, which makes it a viable issue in this case. US Amend I, V, and separation of See, <https://www.yahoo.com/news/johnson-stresses-congress-power-over-162414695.html>

2. I further request an accommodation in the form of an exemption due to costs relating to printing, mailing and transporting pleadings to the Post Office or the court, 1. creating a substantial burden upon my access to the Court to defend the exercise of fundamental rights, 2. and forced violation of religious beliefs by the threat of indebtedness rendering my access to the courts completely vitiated but for my exercise of religious beliefs, even for the discretionary request to file a petition amicus curae. It is the petition coupled with due process I seek to protect even if the underlying motion is denied. US Amend I, V.

3. I am a Christian. It is against my religious belief to become indebted to pay others back at a future time, for things I cannot afford now. It violates my religious belief, by tempting me to be guided by money, business greed, as guide and God, in place of my trust in God as guide, and God in my life. Jesus Christ teaches you cannot make both God and money your master. *Matthew 6:24*. If you choose money as idol, the love for other people will be driven out tempting us to look at others for the love of what benefit we may extract from people

by oppressing, or enslaving them by social pressures. I choose God, not money. Money should be the servant government creates to care for people, not control or enslave people to bend their substantially burdened will to the dictates by those who tempt them by threat of financial penalty or reward in contravention of US Amend I, V, XIII, XIV, and my private religious beliefs in laws outlined in the Bible not limited to *Ezekiel* 18:13.

4. The way money is created eliminates liberty, under the lie of money being liberty. I have arguments outside the scope of this motion to fully fund the government without stealing from Peter to Pay Paul to reverse a planned crash which will lay a foundation to eliminate the government in a schemed overthrow by delegating authority of resources and channels of exchange for the market to non-government entities or those who have control over technology.

5. Non-government-entities (“NGOs) are schemed to control the resources to control the government to eliminate the government should the courts not restrain the acts of both government and government agents including private businesses, charities, churches and other government partners and recipients of economic, social, physical or economic support to perform a government function, from exceeding the purview of Constitutional limits by enslaving or sacrificing people to sustain pain, to sustain power, positions of authority and profit streams for debt creation of money plus interest by those who make it out of thin air securitized by the souls of the people, the land and resources eliminating private ownership of property under the guise of common good, public good, sustaining the world under the model of carbon credit debit where the more environmental pain the more debt created money plus interest that must be owed by a slave not free people. The governments are schemed to be dissolved after 2054 to allow what I believe is the mark of the beast spoken of in the Bible to rule, business greed, unrestrained by love or the just rule of law to protect individual life and individual exercise of liberties. I disagree

with many founders, scientific and enlightenment thinkers' mere theories taught as fact, not limited to the lie of a social contract or a contract, business or consent is freely or voluntarily given to allow others to rule over and violate the right to life and liberties, unless asserted. I received a C or C plus in philosophy in undergrad. I believe God is smarter than philosophers' mere speculating profiteering scientific theories. My religious beliefs may be unique, and even odious to the court, but they are genuine. Nevertheless, the US Supreme Court once announced, "It is wise to remember that the taxing and licensing power is a dangerous and potent weapon which, in the hands of unscrupulous or bigoted men, could be used to suppress freedoms and destroy religion unless it is kept within appropriate bounds." *Follett v. McCormick*, 321 U.S.573, 579 (1944). Thus, I hope the Court does not deny my pleadings based on agreeing with DE finding my religious beliefs in Jesus a disability preventing access to the courts. I alert you to protect the court, the bankruptcy remote entities I used to work on in DE will be used to aide and abet the overthrow if the courts do not prevent it, which is not in issue now, but I warn the court nevertheless. The court is the target to be eliminated to allow business greed unrestrained from human sacrifice and slavery to rule, which is the mark of the beast unrestrained by love or the just rule of law because there is a plan to eliminate the courts to eliminate all freedoms for business.

6. When I rented an apartment to work at Richards, Layton and Finger in upper Delaware in my first job as a lawyer, I prepaid the debt, so as not to violate my religious belief.

7. My religious beliefs against indebtedness are genuine. I have never actually used a real credit card in my personal name. I applied for ones they gave away to college kids, we never used, for free stuff, because I was a dumb college student. In addition, I have used a banking debit card.

8. The debt I owe my parents is not like any other which violates my religious beliefs. It is forgiven if I cannot afford to pay it back in the years to come. Yet, I hope to return to my former law firm in DE. So, I can ease the burden off my parents' back by free choice, not compelled or required mandate.

9. I am impoverished, and the state of DE placed my license on inactive/disabled but for finding my religious beliefs a disability based on my private Religious Freedom Restoration Act law suit against President Trump in Kelly v Trump, USSC No 21-5522, and to cover up the state and court's attacks against me to cause me to foreclose the lawsuit to conceal Court's violation of my access to the courts, petition, association, religious and political beliefs, and exercise of my religious beliefs, and other numerous violations by having an agent Court of Common Pleas Kenneth S. Clark threaten me in a store, BJS, and other threats as I sought protection the court could provide instead of attacks. The State Supreme Court fired staff and secretly sealed evidence in my favor to conceal its dirty hands making them dirtier not clean. I seek to correct not destroy the state courts in a civil rights case.

10. I believe people sin by organized charity or fundraising and assert my right against involuntary servitude or work in a profession by force, to sustain debt creation of money in contravention of US Amend I, V, XIII and Matthew 6:1-4.

11. Pursuant to FRCP R 5 provides in relevant part:

“Rule 5. Serving and Filing Pleadings and Other Papers

(a) Service: When Required.

(1) In General. Unless these rules provide otherwise, each of the following papers must be served on every party...”

(b) Service: How Made.

(1) *Serving an Attorney*. If a party is represented by an attorney, service under this rule must be made on the attorney unless the court orders service on the party.

(2) *Service in General*. A paper is served under this rule by:

(A) handing it to the person;

(B) leaving it:

- (i) at the person's office with a clerk or other person in charge or, if no one is in charge, in a conspicuous place in the office; or
- (ii) if the person has no office or the office is closed, at the person's dwelling or usual place of abode with someone of suitable age and discretion who resides there;
- (C) mailing it to the person's last known address—in which event service is complete upon mailing;
- (D) leaving it with the court clerk if the person has no known address;
- (E) sending it to a registered user by filing it with the court's electronic-filing system or sending it by other electronic means that the person consented to in writing—in either of which events service is complete upon filing or sending, but is not effective if the filer or sender learns that it did not reach the person to be served; or
- (F) delivering it by any other means that the person consented to in writing—in which event service is complete when the person making service delivers it to the agency designated to make delivery.

12. The Federal Rules of Civil Procedure do not offer email as a means to serve the parties. Therefore, I respectfully request an accommodation to prevent foreclosing me of the First Amendment opportunity to petition fairly in accord to 5<sup>th</sup> Amendment Due Process, at least initially. I request permission to use PACER should additional pleadings be required, although I intended to present the court with a narrow question it may consider or choose to reject consideration of at this time, in order to preserve the issue for consideration of review at the US Supreme Court level where I am licensed to practice law. This Court rejected limiting the official authority of Article I and II members to preserve the right to petition fairly in accord with due process and Article III power from being usurped by threats or rewards by Article I and II misuse of official power. I think the court rejected consideration of the arguments since the issues arose at the appellate stage and were not fairly preserved or presented below.

13. On the other hand, I see arising issues viable in this case that may warrant another request to allow the Court to say what the rule of law is at the trial level. On or about March 25, 2025 Speaker the House Mike Johnson in his official capacity appeared to threaten the courts, specifically this Court by defunding it or threatening to defund it should its findings displease Article I and Article II officials. In that case I may seek permission to file another amicus brief

on different arguments I may seek to present in order to prevent harm to the impartiality and the institution of the courts. See, <https://www.yahoo.com/news/johnson-stresses-congress-power-over-162414695.html> Also see, *Law, History, Practice and procedure, in Congressional Research service dated May 12, 2017 at page 4 by Citing Sinclair v. United States, 279 U.S. 263, 295 (1929), holding, “It may be conceded that Congress is without authority to compel disclosure for the purpose of aiding the prosecution of pending suits; but the authority of that body, directly or through its committees to require pertinent disclosures in aid of its own constitutional power is not abridged because the information sought to be elicited may also be of use in such suits.”* Id <https://www.congress.gov/crs-product/RL34097> In light of *Sinclair*, it appears even Congress’s attorney, Todd Garvey, Esquire admits Congress’s authority is limited in that it may not use its power to affect outcomes of cases in pending law suits in contravention of the parties fair right to petition or separation of powers US Amend I,V, and Art I, II, III, which is what the Speaker of the House appears to be doing now, with no one to stop him with the just rule of law should no one petition even by amicus.

14. Petitioners need not call law makers before the court to render the laws they passed unconstitutional per se or as applied. I argue it is similarly not needed to call members of congress before the Court to render their official acts unconstitutional per se or as applied in cases, not limited to use of threats to chill trial, circuit and US Supreme Court members to unduly influence the outcome of cases unfairly in violation of petitioners’ rights to due process, even cloaked under the cloak of official powers. All powers must be limited to the purview of Constitutional limits to protect the petition in accord with due process from vitiation to protect the rule of law that founded, sustains and maintains these United States since 1971 with the passage of the Bill of Rights.

15. With the caveat above to potentially additional arguments should defunding actually occur, I intend to present a limited issue before the Court in support of neither party to protect the right to petition fairly without threats from the President, Congress, or their agents or arms to commandeer the outcome the court at trial and appellate level by innuendos of social attacks, impeachment, or otherwise influence the courts' decision of in violation of Article I, II, and III separation of powers.

16. In the alternative, I respectfully request that the initial service by email to the parties be accepted and request permission to use PACER should the need to file another brief arise. I fear if I mailed in the documents, it would be received too late for consideration.

17. I do not have access to research by Westlaw or Lexis to pull precedent, but I was required to file petitions by email in the Delaware Supreme Court, who rejected my timely filed paper submissions disparately with malicious intent to cause me to foreclose one case. The Third Circuit uses an emergency email to file pressing issues. So, it appears, email service has sufficed in other judicial forums.

18. In addition, a clerk's staff indeed indicated this Court may receive email submissions. They kindly provided an email.

19. I alerted the parties and this honorable Court by Email of my intent to seek permission to file via email where I stated:

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**To:** Boasberg\_Chambers@dcd.uscourts.gov <boasberg\_chambers@dcd.uscourts.gov>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>; nsmith@aclu.org <nsmith@aclu.org>; osarabia@aclu.org <osarabia@aclu.org>; aspitzer@acludc.org <aspitzer@acludc.org>; smichelman@acludc.org <smichelman@acludc.org>; lgelernt@aclu.org <lgelernt@aclu.org>; dgalindo@aclu.org <dgalindo@aclu.org>; agorski@aclu.org <agorski@aclu.org>; ojadwat@aclu.org <ojadwat@aclu.org>; hshamsi@aclu.org <hshamsi@aclu.org>; ptoomey@aclu.org <ptoomey@aclu.org>; strivedi@democracyforward.org <strivedi@democracyforward.org>; bgirard@democracyforward.org <bgirard@democracyforward.org>;



mwaldman@democracyforward.org <mwaldman@democracyforward.org>;  
srich@democracyforward.org <srich@democracyforward.org>;  
sperryman@democracyforward.org <sperryman@democracyforward.org>;  
awiggins@democracyforward.org <awiggins@democracyforward.org>;  
cwofsy@aclu.org <cwofsy@aclu.org>; mnngo@aclu.org <mnngo@aclu.org>;  
abhishek.kambli@usdoj.gov <abhishek.kambli@usdoj.gov>; august.flentje@usdoj.gov  
<august.flentje@usdoj.gov>; christina.p.greer@usdoj.gov  
<christina.p.greer@usdoj.gov>; drew.c.ensign@usdoj.gov <drew.c.ensign@usdoj.gov>;  
Costa Ryan (DOJ) <ryan.costa@delaware.gov>; Naylor Margaret (Courts)  
<margaret.naylor@delaware.gov>

**Sent:** Friday, March 21, 2025 at 09:24:12 AM EDT

**Subject:** 25-cv-00766 Amicus Brief not drafted yet permission before too late in the rapid fire emergency motions case

Dear Honorable Chief Judge of the DC District Court Boasberg,

On Wednesday March 19, 2025, I asked state attorney generals and the plaintiffs to assert President Trump and certain Congress people's exceeded the purview of the Constitutional limits of their power by violating the First Amendment right to petition fairly in accord with 5th Amendment due process fairness by threatening a judge, Chief Judge Boesberg with impeachment to affect the outcome of the case at trial or appellate level, and by conduct of actually drafting articles to commandeer the outcome of the case by threatening a trial forum, creating threats to the appellate and Supreme Court forums should it not rule in its biased favor unfairly in violation of separation of Art. I Art. II, Art. III powers.

I made these arguments at the US Supreme Court, but the court denied consideration of writs of cert in two US Supreme Court cases, No. 23-7372 Kelly v EDPA and 23-7360 Kelly v Swartz et. al.

On Wednesday, I also asked state attorneys to intervene to protect the impartiality of the courts to preserve a fair not threatened forum by two bullying branches. You are in a scary place in DC. Your court is sitting next to those who threaten to commandeer the court the President and Congress. I would prefer to argue in any other court but yours because it is scary for you and I want to protect the courts from afar in DE, not in the thick of harm.

Nevertheless, by a miracle it is a case and controversy before your court now. To my knowledge, no one is making arguments to protect the right to petition in an impartial not threatened forum, or separation of powers to prevent two branches from threatening the court to force outcomes by impeachment and foreseeable defunding too.

I am not licensed in DC, and must file an IFP Motion. I do not have means to research on Westlaw or Lexis, but if no one stands up for the rule of law that founded in 1791, sustains and maintains these United States i fear a dissolution.

I do not understand why State Attorney generals did not make this argument in RI or in the NY Case when Honorable Judge Merchan's daughter was attacked at the trial forum. Your court may be the only forum that is ripe for adjudication at the trail level.

Yesterday, I asked the parties copies herein for their stance via email. I also called the plaintiffs and left a message.

I understand there is an emergency hearing today, March 21, 2025. I fear if no one proffers the issue at the trail forum, if I do not act quickly it may be too late to preserve the issue and the courts will be controlled to be eliminated by automation similar to the peopleless courts in China I warned the USSC and DE District Court on the records in other matters.

I act in good faith in fear if I do not nothing the case will have a decision to be appealed to quickly to even draft anything to mail. I am not even sure if i have the means to pay for postage and paper for something I have not yet written.

I pray the parties make it an issue so i would not have to consider acting quickly possibly fruitlessly as too late.

Nevertheless, I ask special permission, an accommodation to the normal rules in order to serve by email a submission to you and the parties this Honorable Court may accept or reject in light of the dire situation in lieu of customary service.

If the Honorable Court says no, I will respect its decision. My intent is to protect the right to an impartial forum by protecting judges from threats and temptations of bias, even when those honorable judges disagree with me.

To reiterate, I asked state attorney generals to make the arguments I seek to make, but they have not done so. What if a peon someone so insignificant like me is the only person who will make the arguments before it is too late and harm occurs that is difficult to reverse? I am scared no one will make it because opportunities arose, and no one did other than me.

Respectfully,  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939  
pro se Not acting as a lawyer”

20. I wrote the email in order to assert the right to petition to prevent vitiation under great duress. Since then, I have read LCvR 5.1 (a)(b) which provides:

“FORM AND FILING OF DOCUMENTS  
(a) CORRESPONDENCE WITH THE COURT.

Except when requested by a judge, correspondence shall not be directed by the parties or their attorneys to a judge, nor shall papers be left with or mailed to a judge for filing.

(b) FACSIMILE OR EMAIL.

No document shall be transmitted to the Clerk for filing by means of electronic facsimile or email transmission except with express leave of Court.

No document shall be transmitted to the Clerk for filing by means of electronic facsimile or email transmission except with express leave of Court.”

21. I understand my email to all parties and the Honorable Judge will not be filed.

My apologies for my error. I must seek permission first.

22. Someone must assert the right to a fair not threatened forum or the Courts cannot say what the rule of law is freely or fairly, uninhibited by Congressional and Presidential use of mob, military or monetary force to compel outcomes. See, *Marbury v. Madison*, 5 U.S. 137 (1803) ("It is emphatically the province and duty of the Judicial Department to say what the law is")

23. To my knowledge, no one other than myself, has sought to preserve the right of a fair, unbiased forum to petition in accord with 1<sup>st</sup> and 5<sup>th</sup> Am Due process by eliminating ex parte threats by the government agents or arms who abuse alleged legal authority under the color of official capacity under Article I, or II powers to threaten parties, judges or their family member(s) unfairly to affect the outcome at the trial forum and on appellate review by the Article I and Art II members inference and outright proclamations that anyone who disagrees with congress or the president faces similar attacks as the Congressional attacks against by Congress and the President’s abuse of Article I, and II to commandeer and unduly influence outcomes in cases.

24. Trump, his government agents or those who support his administration’s arguably unconstitutional conduct have attacked petitioners in the past to chill, punish and create

conditions of hostility to quash the right to petition fairly against him and his administration. US Amend I, V.

25. Trump passed an executive order to incite sanctions against petitioners who question the Constitutionality of Trump or his administration's conduct.

<https://www.whitehouse.gov/fact-sheets/2025/03/fact-sheet-president-donald-j-trump-prevents-abuses-of-the-legal-system-and-the-federal-courts/>

26. Many if not all states have sitting attorney generals that are neither nominated nor confirmed as US Attorney generals for their district are forced to maintain their loyalty to Trump, to be beholden to him in order to maintain or secure their position by official appointment. Thus, the state Attorney Generals and petitioners of the people are the only ones who have the power to petition the courts to restrain the acts of Trump, his administration or colluding members of Congress in unconstitutional behavior that degrades the security of the nation, by ungluing the rule of law that makes us stick as one United States of America from threat of uncivilized dissolution by force or through the purse strings. Bondi has promised to fire any US Attorney General who disagrees with Trump. How can they restrain him within the purview of Constitutional limits, when doing their job means losing their job by termination. It is a terrible situation for the courts and US and State attorney generals that the courts must alleviate. See, <https://www.nbcnews.com/politics/justice-department/s-trumps-justice-department-now-rcna195289>

27. It is foreseeable that Trump may attack me, plaintiffs and state and federal attorney generals and other government employees to eliminate and chill their right to prevent us from petitioning fairly to preserve the rule of law that founded, sustains and maintains the United States.

28. I understand my license is resigned since June 12, 2019 and the petition for amicus may be denied. Nevertheless, it is the mere opportunity I seek to protect, even if my petition is docketed but denied, in light of these unique circumstances where the security of our nation is at risk by internal threats by Article I and II members, and their NGO partners.

29. This Court has inherent equitable powers over their process to prevent abuse, oppression, and injustice. *Gumbel v. Pitkin*, 124 U.S. 131 (1888); *Covell v. Heyman*, 111 U.S. 176 (1884); *Buck v. Colbath*, 70 U.S. 334 (1865); *Krippendorf v. Hyde*, 110 U.S. 276, 283 (1884).

30. The Court's inherent equitable powers may be required to preserve its own power to say what the rule of law is by Article I and II threats.

31. I respectfully request this Court grant me an exemption of PACER fees in this case, too should it be required (1). in order not to compel me to violate my religious beliefs in exchange for access to the courts or (2). suffer an economic substantial burden so great as to deny me access to the courts in defense of my First Amendment liberties, license and related interests and (3). to prevent government compelled involuntary servitude to sin by making money savior in place of God.

32. It is my religious belief people should buy and sell by free choice, not by forced choice by artificially man-made government compulsion to be exploited by government backed private or foreign partners in a fixed not free economy.

33. I argue compelled debt in my case not only violates the 13th Amendment against involuntary servitude, but violates my private, personal individual religious belief in Jesus, God the father and the holy spirit as guide and God, not money by government compelled force. US Amend I, XIII

34. The Third Circuit Court of appeals kindly granted me an exemption for PACER costs in Kelly v Swartz, NO 22-3198. (Third Circuit Docket Item (“3DI”) 3DI-21, 24, 25, 30). DE District Court kindly extended the exemption for PACER fees in Case No 21-3198 too in Kelly v Swartz, 21-1490. (3DI 91-92)

35. My PACER Account Number 6975241.

36. I respectfully request an exemption be applied for the duration of this case up until appeal or the time has appealed to the US Supreme Court or until July 20, 2025, whichever is longer.

35. I thank the Court and its staff for its help.

36. I agree to send PACER the attached Order or any Order this Court files to exempt PACER fees in this case, should this Court grant my plea.

Wherefore, I, Meghan M. Kelly, Plaintiff, Plaintiff respectfully assert this Court must grant this motion.

Dated April 17, 2025

Respectfully submitted,

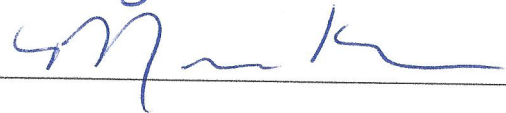
  
/s/Meghan Kelly

Meghan Kelly, Esquire  
DE Bar Number 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
US Supreme Court active license No.  
283696  
Resigned DC Bar June 12, 2019

I declare, affirm that the foregoing statement is true and correct.

Dated: April 17, 2025

Meghan Kelly, (printed)

 (signed)