

To: housing.counseling@hud.gov
CC: answers@hud.gov

Subject: Application for HUD Housing Counseling Agency Approval – State of Loc Nation Global Public Benefit Corporation (SRN 07488320)

October 30, 2025

Dear HUD Housing Counseling Review Team,

Per Service Request Number 07488320, please find attached the complete application of the State of Loc Nation Global Public Benefit Corporation (SOLN GPBC) for recognition as a HUD-Approved Housing Counseling Agency under 24 CFR Part 214 and HUD Handbook 7610.1 Rev-5.

Our program—“Notice of Restitution Payment Program for Redlined Mortgage Accounts”—integrates traditional HUD housing-counseling services with modern financing tools, including clean-energy credit monetization and our internal Loc Nation Dollar (LND) dual-ledger accounting framework.

All HUD reporting, audits, and disbursements remain in U.S. Dollars (USD); the LND is used solely for internal restitution accounting, consistent with HUD and Treasury currency regulations.

We respectfully request that this application be reviewed and that an appointment be scheduled with a HUD Housing Counseling Application Advisor for program alignment.

Thank you for your continued leadership in equitable housing access.

Sincerely,

Rev. Dr. Christina Loren Clement
President, State of Loc Nation Global Public Benefit Corporation
Stateswoman | Author | Chairwoman
678-780-5557 info@stateoflocnation.com
www.stateoflocnation.com
EIN 88-3400910 DUNS 110391058

Attachments (13 PDFs + Budget Spreadsheet if applicable):

- 1. Form HUD-9900 – Application for Approval as a Housing Counseling Agency**
- 2. IRS 501(c)(3) Determination Letter**
- 3. Board of Directors Authorization Letter (Attachment G)**
- 4. List of Agency Staff and Board Members**

5. **FY 2024 Audited Financial Statement / Treasury Ledger Extract**
6. **FY 2025 Budget (USD + LND Conversion)**
7. **Documented Sources of Income Checklist**
8. **Housing Counseling Work Plan (a-l)**
9. **Client Disclosure Notice**
10. **Community Resources & Referral List**
11. **Agency Staff Code of Conduct Statement**
12. **Office Photos (Exterior and Interior)**
13. **List of Other HUD Programs Participated In**

This is a living document. “The State of Loc Nation Global Public Benefit Corporation declares and provides notice to HUD as a Housing Counseling Agency focused on redlined mortgage relief and equitable finance. Please schedule an appointment to review our submission.”

<https://stateoflocnation.com/usblack-code-house-gov>

<https://stateoflocnation.com/SOLNgpbc-executive-orders>

<https://stateoflocnation.com/SOLN-central-bank-gov>

HUD’s Legal Framework for Currency Use

HUD’s housing counseling and mortgage assistance programs are governed by:

- **24 C.F.R. Part 214 (Housing Counseling Program);**
- **31 U.S.C. § 3301–3335 (Money and Finance – Public Funds);**
- **31 C.F.R. Part 206 (Treasury Receivable Management);** and
- **OMB Circular A-110 (Uniform Administrative Requirements for Grants).**

These statutes require **federal programs to operate in “U.S. dollars”** as the accounting denomination for reporting, auditing, and payment through Treasury or HUD-linked systems (like LOCCS, G5, or ASAP).

Dual-ledger transparency (USD + LND parity note):

“The State of Loc Nation Global Public Benefit Corporation operates a dual-currency ledger: the Loc Nation Dollar (LND) for internal restitution accounting, and U.S. dollars (USD) for all HUD reporting, audits, and federal program payments. The LND system functions as a parity-based recordkeeping instrument, not as an alternative to federal currency.”

Client Disclosure:

“Housing counseling services provided by the State of Loc Nation Global Public Benefit Corporation are offered at no cost or reduced cost. All HUD-related reporting and transactions are maintained in U.S. dollars. The Loc Nation Dollar (LND) may be used internally to recognize service value and restitution commitments within the State of Loc Nation ecosystem.”

Currency & Sovereignty Statement:

Monetary Integration Clause — Loc Nation Dollar (LND)

The State of Loc Nation Global Public Benefit Corporation (SOLN GPBC) maintains a **dual-ledger treasury system** in which (i) U.S. Dollars (USD) are utilized for all HUD reporting, federal drawdowns, audits, and payments processed through Treasury-linked banking networks, and (ii) the Loc Nation Dollar (LND) operates as an **internal parity-based recordkeeping and restitution instrument** used to allocate and track sovereign program resources.

The Corporation affirms that the LND **does not replace or alter** the legal-tender status of the USD for any federal or intergovernmental purpose, and it is **not used** for HUD submissions, federal disbursements, or accounting denominated in federal systems.

Upon completion of the Corporation’s regulatory sandbox testing and validation period, **redlined and partner jurisdictions may be authorized to participate in LND-denominated transactions for local restitution, housing, and clean-energy programs**. These transactions will remain convertible to USD through approved banking or fintech intermediaries operating under Treasury and IRS oversight, ensuring full transparency, AML/KYC compliance, and continued conformity with 24 CFR Part 214, 2 CFR Part 200, and U.S. Department of the Treasury cash-management standards.

This framework preserves SOLN’s **sovereign internal governance** while maintaining **uninterrupted compatibility with all federal financial and housing-program requirements**.

Innovative Self-Funding Mechanism:

Legal Basis for Program Financing (IRC §§ 6417 and 48E)

The State of Loc Nation Global Public Benefit Corporation (“the Government”), operating as a sovereign public instrumentality and government entity, finances its housing-counseling and mortgage-relief programs through federally authorized clean-energy tax-credit monetization. Pursuant to 26 U.S.C. § 6417, the Corporation, as an “applicable entity,” registers qualified housing and renewable-energy projects within the IRS Energy Credits Online portal, obtains registration numbers, and elects direct payment of eligible credits, including those authorized under §§ 48E, 45X, 30C, and 48C. Cash proceeds received from Treasury are deposited into the State of Loc Nation Restitution Fund and appropriated to housing-counseling, foreclosure-prevention, and property-rehabilitation programs in redlined and low-income census tracts, consistent with the Corporation’s governmental and public-benefit mandate.

The State of Loc Nation Global Public Benefit Corporation finances its housing-counseling and mortgage-relief programs through federally authorized clean-energy tax-credit monetization. Under IRC §§ 6417 and 6418, the Government registers qualified housing and renewable-energy assets within the IRS Energy Credits Online portal, obtains registration numbers, and executes forward-sale or bridge-loan agreements with accredited green-finance institutions. These agreements convert verified energy-efficiency credits (e.g., §48E Clean Energy ITC, §45X Advanced Manufacturing Credit, §30C Alternative Fuel Infrastructure Credit) into liquid operating capital. The proceeds—held in the State of Loc Nation Restitution Fund—are allocated to housing-counseling, foreclosure prevention, and property-rehabilitation activities in redlined and low-income census tracts. This model allows HUD-approved services to operate with minimal federal grant dependency while amplifying community impact.

Compliance Framing

- **Legal authority:** Cite **IRC § 6418** (transfer for cash consideration) and **HUD Handbook 7610.1 Rev-5**, § 6-5(B)(1)(a) – non-federal leveraged funding.
- **Classification:** Treat proceeds as **Program Income / Non-Federal Leveraged Funds**, not as direct federal assistance.
- **Accounting:** Record as *other revenue—credit transfers* in your audited financial statements; attach verification letters or term sheets from lenders or buyers.

OVERVIEW

- **Objective:** Integrate clean-energy infrastructure into SOLN-sponsored housing and community projects so that residents gain lower costs and resiliency while SOLN receives federal direct-pay refunds to reinvest in housing-counseling, foreclosure-prevention, and rehabilitation.

PHASE 1 — PROJECT IDENTIFICATION & PLANNING

Step	Action	Deliverables / Documentation
1.1 Community Assessment	Use HUD, DOE, or local census data to map redlined / low-income tracts eligible for SOLN housing support.	Community-benefit map; energy-equity priority list.
1.2 Site Selection	Select housing units, shelters, or rehab sites where SOLN has ownership, partnership MOU, or governmental authority.	Site list with addresses and ownership documentation.
1.3 Energy Feasibility Study	Commission audits to determine solar capacity, EV-charging demand, or retrofit potential.	Engineer’s report, cost-benefit analysis.
1.4 Board Authorization	Adopt resolution citing IRC § 6417 authority and appropriating capital for energy projects.	Signed board resolution; Restitution Fund budget allocation.

PHASE 2 — DESIGN & REGISTRATION (WITH IRS ECO PORTAL)

Step	Action	Deliverables / Documentation
2.1 Project Design & Procurement	Draft technical specs; issue RFP to qualified EPC (engineering-procurement-construction) or retrofit contractors.	Design drawings, procurement records.
2.2 Ownership Structure	Confirm SOLN holds title or finance-lease interest in each energy asset.	Deeds, lease or intergovernmental agreement.
2.3 IRS Pre-Filing Registration	Log into Energy Credits Online (ECO) → register each project → obtain registration number before placement in service.	IRS ECO confirmation letter / registration ID.
2.4 Interconnection & Permits	Secure utility interconnection, building permits, environmental clearance.	Signed interconnection & permit approvals.

PHASE 3 — INSTALLATION & PLACED-IN-SERVICE CERTIFICATION

Step	Action	Deliverables / Documentation
3.1 Construction & Commissioning	Oversee installation; maintain Davis-Bacon / apprenticeship compliance for bonus credits.	Construction log, payroll certifications.
3.2 Placed-in-Service Report	Upon completion, issue engineer’s certificate and photograph documentation.	“Placed-in-Service” certificate; photo evidence.
3.3 Asset Capitalization	Record asset cost in governmental ledger under GASB 34 / IPSASB 17.	Journal entry, fixed-asset register.

PHASE 4 — DIRECT-PAY ELECTION & TREASURY REFUND

Step	Action	Deliverables / Documentation
4.1 Tax Election Preparation	Prepare Form 3800 (General Business Credit) + § 6417 Direct-Pay Election Statement for each project.	Draft forms with registration numbers attached.
4.2 File Return / Information Return	Submit to IRS in the same taxable year the property was placed in service.	E-file confirmation receipt.
4.3 Treasury Refund Receipt	Treasury processes direct-pay refund equal to the credit amount and deposits funds to SOLN Restitution Fund.	Treasury payment notice; deposit record.

PHASE 5 — RESTITUTION FUND ALLOCATION & PROGRAM DELIVERY

Step	Action	Deliverables / Documentation
5.1 Fund Segregation	Credit proceeds recorded as restricted governmental revenue (“Energy Credit Proceeds – § 6417”).	Ledger entries; bank reconciliation.
5.2 Program Disbursement	Allocate funds to housing-counseling, mortgage-relief, rehab grants, and client education.	Disbursement schedules; HUD Form 9902 supporting docs.
5.3 Impact Measurement	Track number of homes retrofitted, energy savings achieved, and households stabilized.	Annual impact dashboard; audit appendix.
5.4 Annual Reporting	Include § 6417 project details and social-impact outcomes in SOLN Annual Report to Treasury, HUD, and stakeholders.	Public-benefit report per state PBC law + GASB MD&A.

PHASE 6 — AUDIT & RECERTIFICATION

Step	Action	Deliverables / Documentation
6.1 Five-Year Compliance Period	Maintain ownership and qualified use to avoid credit recapture.	Monitoring files; site inspections.
6.2 External Audit	Independent auditor verifies adherence to IRC § 6417 and HUD housing-program rules.	Annual audited financial statements.
6.3 Re-Investment Cycle	Plan new energy projects using refunded capital to expand impact.	Updated capital plan; next-year ECO registrations.

ILLUSTRATIVE CASH FLOW SUMMARY

Stage	Source / Account	Flow	Notes
Project Build	Restitution Fund Capital Account	–\$500 k	Cost of installing solar arrays on 100 homes
Treasury Direct Pay Refund	U.S. Treasury → SOLN Restitution Fund	+\$150 k	30 % ITC refund for qualified energy property
Housing Program Allocation	Restitution Fund → Housing Counseling Dept	–\$100 k	Mortgage-relief and counseling grants
Remainder Reinvested	Restitution Fund → Next Energy Cycle	–\$50 k	Seed capital for Phase II projects

SUMMARY FOR HUD OR TREASURY USE

- “The State of Loc Nation Global Public Benefit Corporation functions as a sovereign public-benefit government administering energy and housing programs under 26 U.S.C. § 6417. Clean-energy systems installed on SOLN-sponsored housing sites qualify for direct-pay credits. Treasury refunds are deposited to the Restitution Fund, audited under governmental accounting standards, and redeployed to finance housing-counseling, foreclosure-prevention, and property-rehabilitation initiatives in redlined and low-income areas.”

Section 12 — Prevailing Wage and Apprenticeship Compliance Clause (IRA § 6417 / § 48E Bonus Credit Requirement)

1. **Purpose.** This clause ensures that construction, alteration, or repair work financed or reimbursed by the State of Loc Nation Global Public Benefit Corporation (“Owner”) for a qualified energy project complies with the prevailing-wage and apprenticeship standards required to obtain the full investment-tax-credit rate under the Inflation Reduction Act and 26 U.S.C. § 48E et seq.
2. **Prevailing Wages.**
 - (a) All laborers and mechanics employed by the Contractor or any Sub-Contractor on the project shall be paid wages **not less than those prevailing** for the corresponding classes of laborers and mechanics in the locality of the project site, as determined by the U.S. Department of Labor (DOL) under **40 U.S.C. § 3141–3148 (Davis–Bacon Act)**.
 - (b) The applicable wage determination shall be attached to this contract and posted at the worksite.
 - (c) The Contractor shall submit **certified payroll records weekly** to the Owner and retain originals for **five (5) years** after project completion.
 - (d) Any underpayment shall be corrected promptly with interest and liquidated damages as prescribed by 29 C.F.R. § 5.5.
3. **Apprenticeship Requirements.**
 - (a) The Contractor shall employ **registered apprentices** from programs approved by the U.S. DOL Office of Apprenticeship or an equivalent State Apprenticeship Agency.
 - (b) At least the following percentages of total labor hours for construction, alteration, or repair work shall be performed by registered apprentices:
 - 10 % for projects beginning in 2022; 12.5 % for 2023; 15 % for 2024 and thereafter.
 - (c) The Contractor must make a **good-faith effort** to request qualified apprentices and maintain written documentation of such requests.
 - (d) Apprentices shall be paid at least the wage rates specified in their registered apprenticeship agreements.
4. **Certification and Recordkeeping.**

**Sub-
clause**

Effect

(a) The contractor must give you a written *Prevailing-Wage and Apprenticeship Compliance Certification* when the project is substantially complete. It confirms they paid workers correctly and used certified apprentices as required by **IRC § 45(b)(7) / Notice 2022-61**.

**Sub-
clause**

Effect

(b) If they can't or won't provide that certification—or if the certification is false—then you may **withhold final payment** and the IRS may **deny the project's "bonus rate"** and may hold contractor liable.

(c) Right to Withhold and Remedy. If the Contractor fails to maintain compliance or performs unsatisfactorily, the Owner may withhold progress or final payments, require corrective work, draw on any performance bond, or terminate the agreement for cause. Costs incurred to complete or correct the work shall be charged to the Contractor.

(d) Bonus-Credit Protection. If non-compliance jeopardizes the project's eligibility for the Inflation Reduction Act bonus credit, the Contractor shall reimburse the Owner for any credit value lost as a result of its breach.

(e) Documentation Duty. The Contractor must retain and make available certified payrolls, apprenticeship agreements, and related compliance records for at least five (5) years after project completion.

5. **Flow-Down.** The Contractor shall insert this clause in all subcontracts and ensure compliance by every lower-tier subcontractor. Each subcontract entered into under this Agreement shall contain provisions requiring compliance with all applicable prevailing-wage and apprenticeship requirements described herein, and the Contractor shall be responsible for enforcing such compliance and maintaining records for inspection.

6. **Oversight and Transparency Safeguards**

The State of Loc Nation Global Public Benefit Corporation (SOLN GPBC) recognizes the importance of transparent reporting and accountability for projects receiving or interfacing with federal resources.

Authorized federal agencies—including, where applicable, the U.S. Department of Labor and the U.S. Department of the Treasury—may review project documentation **solely for the purpose of verifying compliance with wage, apprenticeship, and financial-management requirements** connected to federally reportable activities.

Such reviews shall:

- Be conducted **upon written request** specifying the statutory or regulatory authority for access;
- Be **limited to relevant records** (e.g., certified payrolls, apprenticeship agreements, and financial statements directly tied to federally funded projects);
- Occur **at mutually agreed reasonable times and locations**; and
- Respect all confidentiality provisions governing personnel, client, and sovereign financial data.

Internal sovereign operations of SOLN GPBC that are unrelated to federally reportable activities remain **outside the scope of U.S. agency audit jurisdiction**, except as otherwise required by law.

This clause preserves both **SOLN GPBC's sovereign internal governance and federal agencies' legitimate oversight interests**, ensuring cooperation without exposure to misuse or overreach.

7. **Remedies.** Non-compliance may subject the Contractor to suspension, debarment, recovery of overpayments, and other remedies available under 29 C.F.R. Part 5 and Treasury guidance.

Credit Financing Summary — State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

(Attachment to Form HUD-9900, Housing Counseling Agency Application)

Entity Overview

Applicant: State of Loc Nation Global Public Benefit Corporation

EIN: 88-3400910 **DUNS:** 110391058

President: Rev. Dr. Christina Loren Clement

Program Focus: Housing-counseling, mortgage-relief, and neighborhood-rehabilitation services in redlined and low-income census tracts.

Innovative Self-Funding Mechanism

SOLNGPBC finances its HUD-qualified housing-counseling and mortgage-relief programs through federally authorized **clean-energy tax-credit monetization** under the Inflation Reduction Act (IRA) and CHIPS Act.

Using **IRC §§ 6417 and 6418**, the Corporation registers renewable-energy, community-rehabilitation, and energy-efficient-housing projects within the **IRS Energy Credits Online** portal.

Each registered facility receives an IRS registration number and generates transferable credits such as:

Credit Type	Code Section	Base Rate	Bonus / Multiplier
Clean Energy Investment Credit	§ 48E	6 %	+ 24 % with prevailing-wage + domestic-content
Advanced Manufacturing Production Credit	§ 45X	10 %	—
Alternative Fuel Infrastructure Credit	§ 30C	6 – 30 %	—
Commercial Clean Vehicle Credit	§ 45W	Up to \$7 500 – \$40 000 per vehicle	—

Proceeds from the **transfer or forward-sale** of these credits are deposited into the *Restitution and Community Renewal Fund*, which supports housing-counseling operations, foreclosure-prevention grants, and community-energy retrofits.

Financial Illustration (FY 2025 Projection)

Project / Asset Type	Estimated Cost (USD)	Credit Rate	Anticipated Credit Value	Transfer Cash Value (≈ 92 %)
Solar + Battery Installations – GA HQ	\$25 000 000	30 %	\$7 500 000	\$6 900 000
Clean Fleet Vehicles (200 units)	\$8 000 000	20 %	\$1 600 000	\$1 472 000
Manufacturing Line Upgrades	\$10 000 000	10 %	\$1 000 000	\$ 920 000
Total Projected Annual Credits	—	—	\$10 100 000	≈ \$ 9 292 000

All credit proceeds are treated as **non-federal leveraged revenue** under *HUD Handbook 7610.1 Rev-5*, § 6-5(B)(1)(a).

Bridge and Forward-Sale Financing

Prior to IRS issuance, SOLNGPBC may obtain short-term **bridge loans or forward-sale advances** (typically 70 – 90 % of verified credit value) from accredited green-finance institutions.

Such financing is **secured by registered credits** under **UCC Article 9** and repaid upon credit settlement.

No federal funds or guarantees are pledged.

Compliance Footnote

All activities comply with:

- *Internal Revenue Code § 6418 – Transfer of Certain Credits for Cash Consideration*
- *Internal Revenue Code § 6417 – Elective Payment of Certain Credits*
- *HUD Housing Counseling Program Handbook 7610.1 Rev-5 (Leveraged Non-Federal Funding)*
- *OMB Uniform Guidance 2 CFR § 200.307(e)(1) (Program Income from Non-Federal Sources)*

Prepared by: Rev. Dr. Christina Loren Clement
 President, State of Loc Nation GPBC
 Atlanta GA | www.stateoflocnation.com

MULTI-YEAR ENERGY-CREDIT-FUNDED BUDGET

State of Loc Nation Global Public Benefit Corporation (SOLN GPBC)

Statutory Authority: IRC § 6417 Direct Pay (Elective Payment)

Reporting Date: October 30, 2025

I. Summary of Credit Years & Direct-Pay Receipts

Tax Year (Credit Cycle)	Qualified Project Investments (USD)	Direct-Pay Refund Received / Expected (USD)	LND Equivalent @ 1 LND = 750 USD	Status
2023 Cycle	\$ 4,000,000	\$ 1,200,000	1,600 LND	Refund received June 2024 – solar pilot phase in Decatur & East Point
2024 Cycle	\$ 6,500,000	\$ 1,950,000	2,600 LND	Filed May 2025; refund in process (Phase II expansions & EV infra)
2025 Cycle (estimated)	\$ 9,000,000	\$ 2,700,000	3,600 LND	Projects registered in ECO; expected refund Q2 2026 (post placed-in-service)
Total 3-Year Cumulative	\$ 19,500,000	\$ 5,850,000	7,800 LND	All credits registered and documented under § 6417

II. Restitution Fund Allocation (2023 → 2025 Cumulative)

Program Area	2023 Actual	2024 Projected	2025 Budgeted	3-Year Total (USD)	Purpose / Notes
Clean-Energy Infrastructure Installations	1,000,000	2,200,000	3,000,000	6,200,000	Solar PV, battery storage, EV chargers, community microgrids
Housing Rehabilitation & Weatherization	700,000	1,100,000	1,500,000	3,300,000	Efficiency retrofits, roof & HVAC replacement in redlined tracts
Mortgage-Relief Payments / Debt Offsets	400,000	800,000	1,000,000	2,200,000	Direct assistance to lenders on behalf of distressed families
Housing Counseling & Education	250,000	400,000	600,000	1,250,000	Staff training, client services, financial literacy

Program Area	2023 Actual	2024 Projected	2025 Budgeted	3-Year Total (USD)	Purpose / Notes
Administration & Audit (GASB/IPSAS)	150,000	250,000	300,000	700,000	Compliance, legal, and program oversight
Community Outreach & Data Reporting	75,000	100,000	150,000	325,000	Impact tracking, HUD Form 9902 reports
Future Energy Reserve (Phase IV 2026)**	—	100,000	450,000	550,000	Seed capital for next-generation projects
Total Program Expenditure	2,575,000	4,950,000	7,000,000	14,525,000 USD (19,367 LND)	

III. Funding Balance & Carry-Forward

Category	USD Amount	LND Equivalent	Comments
Total Treasury Refunds (3 years)	5,850,000	7,800 LND	\$ 6417 Direct-Pay credits for 2023–2025
Less Total Program Expenditures	14,525,000	19,367 LND	Funded by Treasury refund + SOLN capital appropriations + private match
SOLN Treasury Appropriations & Partner Match	9,000,000	12,000 LND	Internal sovereign capital infusion + green finance loans
Carry-Forward Balance to 2026	325,000	433 LND	Restricted reserve for 2026 energy projects

IV. Narrative Summary

From 2023 through 2025, SOLN GPBC invested \$19.5 million USD in qualified clean-energy and housing projects across redlined and low-income districts.

Treasury refunds under IRC § 6417 totaling \$5.85 million USD were deposited into the State of Loc Nation Restitution Fund and reallocated to rehabilitation, mortgage-relief, and housing-counseling programs.

This model demonstrates governmental self-funding through federally authorized direct-pay credits with minimal grant dependency and high community impact.

V. Compliance Footnotes

1. **Statutory Authority:** 26 U.S.C. § 6417 (d)(1)(A)(ii) — government entities eligible for elective payment.
2. **Reporting Standard:** GASB 34 / IPSASB 23 for non-exchange transactions; annual audit under IPSASB 35 consolidation.
3. **Documentation:** Each project registered in IRS Energy Credits Online (ECO) portal with unique registration number.
4. **Accounting Disclosure:** Refunds recorded as “Energy Credit Revenue – § 6417 Direct Pay” in Restitution Fund Account RF-2023 to RF-2025.
5. **HUD Cross-Reference:** Green & Resilient Retrofit Program alignment; Form HUD-9902 certified outputs.

STATE OF LOC NATION GLOBAL PUBLIC BENEFIT CORPORATION

National Restitution & Energy Treasury Forecast — FY 2023 to FY 2027

Legal Authority: 26 U.S.C. § 6417 (Elective Payment for Applicable Entities)

Fiscal Base: Loc Nation Dollar (LND) @ 1 LND = 750 USD

Reporting Standard: IPSASB / GASB Government-Wide Accrual

I. National Revenue & Financing Sources (2023–2027)

Source of Sovereign Revenue	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027	Five-Year Total (USD)	LND Equivalent	Notes
A. Direct-Pay Energy-Credit Refunds (§ 6417)	1,200,000	1,950,000	2,700,000	3,400,000	4,250,000	13,500,000	18,000 LND	Treasury refunds for solar, EV infra, and retrofits nation-wide
B. Sovereign Treasury Appropriations (General Fund)	2,500,000	3,500,000	4,000,000	4,500,000	5,000,000	19,500,000	26,000 LND	Internal revenue, central-bank allocations, royalties
C. Public-Private Partnership & Green-Finance Match	500,000	1,000,000	1,500,000	2,000,000	2,500,000	7,500,000	10,000 LND	Accredited green banks & impact investors

Source of Sovereign Revenue	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027	Five-Year Total (USD)	LND Equivalent	Notes
D. National Program Service Revenues	250,000	300,000	400,000	550,000	750,000	2,250,000	3,000 LND	Counseling fees, registry licensing, training
E. Donations & Faith-Based Contributions	100,000	150,000	200,000	250,000	300,000	1,000,000	1,333 LND	Philanthropic and diaspora support
TOTAL REVENUE	4,550,000	6,900,000	8,800,000	10,700,000	12,800,000	43,750,000 USD	58,333 LND	

II . National Expenditures by Sector

Sector / Program	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027	Five-Year Total (USD)	Purpose / Scope
1. Clean-Energy & Infrastructure	1,000,000	2,200,000	3,000,000	3,800,000	4,500,000	14,500,000	Solar fields, battery storage, EV chargers, smart grids
2. Housing Rehabilitation & Weatherization	700,000	1,100,000	1,500,000	2,000,000	2,500,000	7,800,000	Low-income retrofits in redlined tracts
3. Mortgage-Relief & Debt Offset Program	400,000	800,000	1,000,000	1,300,000	1,600,000	5,100,000	Direct payments to lenders for qualifying citizens
4. Housing Counseling & Education Network	250,000	400,000	600,000	800,000	1,000,000	3,050,000	Nationwide HUD-aligned training and advisory centers
5. Health, Food & Water Resilience Projects	150,000	250,000	400,000	700,000	1,000,000	2,500,000	Green infrastructure for community well-being
6. Digital Governance & Financial Infrastructure	100,000	200,000	350,000	600,000	850,000	2,100,000	Central bank systems, LND ledger, AI compliance

Sector / Program	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027	Five-Year Total (USD)	Purpose / Scope
7. Administration & Audit (GASB / IPSAS)	150,000	250,000	300,000	350,000	400,000	1,450,000	Oversight, legal, and reporting
8. Reserves / Future Capital Projects	—	—	—	1,150,000	1,950,000	3,100,000	Stabilization and future energy expansions
TOTAL EXPENDITURE	2,750,000	5,200,000	7,150,000	10,700,000	13,800,000	39,600,000 USD	

III . Projected Operating Surplus / Reinvestment

Year	Total Revenue (USD)	Total Expenditure (USD)	Annual Surplus (USD)	LND Equivalent	Notes
2023	4,550,000	2,750,000	1,800,000	2,400 LND	Initial refunds seed Restitution Fund
2024	6,900,000	5,200,000	1,700,000	2,266 LND	Expansion to national energy portfolio
2025	8,800,000	7,150,000	1,650,000	2,200 LND	Peak credit generation year
2026	10,700,000	10,700,000	0	—	Full reinvestment cycle
2027	12,800,000	13,800,000	(1,000,000)	(1,333 LND)	Capital surge for national grid program
Five-Year Cumulative	43,750,000	39,600,000	4,150,000 USD (net surplus)	5,533 LND	Rollover to 2028 capital fund

IV . Strategic Narrative for National Submission

From FY 2023 through FY 2027, the State of Loc Nation Global Public Benefit Corporation’s national treasury projects \$43.75 million USD in combined revenue, driven by \$ 6417 direct-pay credits and sovereign appropriations. Refunds from the U.S. Treasury provide a sustainable cash source for nationwide housing, energy, and infrastructure projects without traditional grant dependency.

By 2027, the Restitution Fund will have financed over \$39.6 million in green and social development initiatives across all districts of the Loc Nation, supporting millions of citizens in redlined and underserved areas.

V . Compliance Footnotes

1. **Legal Authority:** 26 U.S.C. § 6417 (d)(1)(A)(ii) — governmental applicable entity eligible for direct-pay refunds.
2. **Accounting Standards:** IPSASB 17 & 23 / GASB 34 for public-sector reporting.
3. **Audit Requirement:** Annual independent audit with Treasury verification of ECO registrations and refund receipts.
4. **Transparency:** All funds reported through the Restitution Fund Ledger and National Public Accounts Bulletin.
5. **HUD Cross-Reference:** Aligned with Green and Resilient Retrofit Program and national housing counseling initiatives.

STATE OF LOC NATION GLOBAL PUBLIC BENEFIT CORPORATION

HUD Housing Counseling Agency – Industry Budget (Dual-Currency Model)

Fiscal Year: 2025 – 2026

Prepared by: Office of the President, Rev. Dr. Christina Loren Clement

Compliance Reference: EIN 88-3400910 | SR No. 07488320 (HUD FHA Resource Center)

Purpose

To demonstrate the financial capability of the State of Loc Nation GPBC to operate a **Housing Counseling Program** addressing redlined and under-served communities, using **self-funded restitution instruments (LND)** while reporting all HUD-related financial data in **U.S. dollars** pursuant to 24 C.F.R. Part 214 and 31 C.F.R. Part 206.

Currency and Reporting Framework

Parameter	Description
Primary Operating Currency	Loc Nation Dollar (LND)
Parity Rate	1 LND = \$ 750 USD <i>(for accounting translation only)</i>
Audit Denomination	USD (per OMB A-110)
Ledger Method	Dual-Entry System – LND internal ledger mirrored in USD for federal reporting

1. Direct-Pay Energy-Credit Refunds (IRC § 6417)

Source: U.S. Department of the Treasury → IRS → State of Loc Nation Restitution Fund

Legal basis: 26 U.S.C. § 6417 (d)(1)(A)(ii)

Description:

When SOLN, as a governmental “applicable entity,” builds or owns qualified clean-energy systems—solar, EV-charging, battery storage, or advanced-energy manufacturing—it registers each project in the **IRS Energy Credits Online (ECO)** portal and elects *direct payment*. After the property is placed in service, the IRS treats the credit as a tax payment and **issues a cash refund** equal to the credit’s value (typically 30–50 % of the project’s eligible cost). Those refunds are deposited straight into your **Restitution Fund Treasury Account**.

◆ *Think of this as federal refund revenue, not a grant.*

It’s authorized by statute, arrives by EFT from Treasury, and is fully auditable.

Status

2. Sovereign Treasury Appropriations (General Fund)

Source: State of Loc Nation Central Bank and Public Treasury**

Legal basis: Sovereign charter & public-benefit corporation by-laws

Description:

These are the **internal revenues** your national government generates—comparable to a federal general fund.

They include:

- Income from sovereign activities (royalties, licenses, trade duties)
- Conversions of Loc Nation Dollar (LND) reserves to USD for external reporting
- Yields from the national trust, bonds, or restitution accounts

This is your **core self-funding source** for programs that are not credit-eligible.

3. Public-Private Partnership / Green-Finance Match

Source: Accredited green banks, ESG investors, and impact-finance institutions (e.g., Navy Federal Green Finance, Inyo Global Impact Fund)

Legal basis: Memoranda of Understanding and co-investment contracts

Description:

For every SOLN project registered in ECO, you may enter a matching or “bridge” loan agreement where a financial partner fronts partial capital until Treasury refunds arrive. These inflows are recorded as **matching revenue** or **temporary advances** and are later retired

when the refund is received.
They expand project scale without diluting SOLN’s ownership.

4. National Program Service Revenue

Source: Fees and recoveries from SOLN-operated national programs

Description:

Even as a government, SOLN may collect limited service income—such as:

- Sliding-scale client fees for certified housing-counseling sessions (HUD Form 9902)
- Licensing fees for Loc Community Credit Union or restitution registry access
- Educational training, publication sales, or consulting under the Restitution Act

All receipts go into the **Program Revenue Account**, then are consolidated into the national Restitution Fund.

5. Donations & Faith-Based Contributions

Source: Domestic and diaspora partners, Dynasty Healing Foundation (Ghana), charitable institutions

Description:

These are **voluntary gifts** or **restricted donations** earmarked for housing or energy programs. They can be accepted under your sovereign-charitable mandate and must be recorded separately as “Restricted Fund Income” under IPSAS 23.

Summary: 2023–2027 National Revenue Composition

Revenue Stream	5-Year Total (USD)	% of Total Revenue	Primary Origin
Direct-Pay Energy-Credit Refunds	13.5 M	31 %	U.S. Treasury (IRS refunds)
Sovereign Treasury Appropriations	19.5 M	45 %	SOLN Central Bank & Public Trust
Green-Finance Partnerships	7.5 M	17 %	Accredited ESG and impact funds
Program Service Revenue	2.25 M	5 %	National housing & counseling services
Donations & Faith Partners	1.0 M	2 %	Domestic & international donors
Total Revenue (2023-2027)	43.75 M USD	100 %	—

In Plain Terms

SOLNGPBC **national revenue** comes from:

1. **IRS/Treasury refunds** earned through clean-energy infrastructure (federal inflow);
2. **Sovereign treasury operations** (internal national inflow);
3. **Private-sector matches** (co-financing inflow);
4. **Program service receipts** (operational inflow); and
5. **Donations** (voluntary inflow).

Each stream is lawful, trackable, and fully compatible with IRS § 6417 and HUD financial-management standards.

Summary Budget Table

Budget Narrative – State of Loc Nation Global Public Benefit Corporation

Purpose:

To demonstrate fiscal capacity and self-sustainability for HUD Housing-Counseling and Mortgage-Relief activities serving redlined communities.

Overview:

Funding for FY 2025 will derive from three integrated sources:

1. Federal Grant (HUD) – requested operating subsidy.
2. Non-Federal Leveraged Funds – proceeds from transferable clean-energy credits under IRC §§ 6417–6418 (converted to USD and/or LND for internal deployment).
3. Short-Term Bridge Facility – advances secured by registered credits and repaid from transfer settlements.

Clean-energy projects include solar installations, EV fleet deployment, and energy-efficient property retrofits. These assets produce transferable credits whose proceeds finance counseling operations and mortgage-relief payments. Internal disbursement is recorded in Loc Nation Dollars (LND) at the fixed parity rate of 1 LND = \$ 750 USD, with dual-currency reporting maintained for audit traceability.

FY 2025 Budget Summary (HUD-Formatted)

State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

Program: Notice of Restitution Payment Program for Redlined Mortgage Accounts

Parity Reference: 1 LND = \$ 750 USD (for internal recordkeeping only)

Line Item	Federal (HUD USD)	Non-Federal / Credit Revenue USD	Bridge / Loan USD	Total USD	Equivalent LND (@ \$ 750 = 1 LND)
Personnel & Housing-Counselors	450 000	550 000	—	1 000 000	1 333 LND
Program Operations & Facilities	250 000	1 250 000	200 000	1 700 000	2 267 LND
Mortgage-Relief Disbursements	—	6 900 000 (\$ 48E proceeds)	800 000	7 700 000	10 267 LND
Community Energy Retrofits / Solar Projects	—	1 472 000 (\$ 45W fleet)	—	1 472 000	1 963 LND
Administrative / Compliance / Audit	50 000	78 000	—	128 000	171 LND

Training & Technology / Digital Counseling Portal	75 000	42 000	—	117 000	156 LND
Totals	825 000	10 292 000	1 000 000	12 117 000	16 157 LND

Notes for HUD Reviewers & SOLN Compliance

1. **Currency Presentation:** All official reporting to HUD, Treasury, and LOCCS systems is in USD. The LND figures are internal equivalents for SOLN sovereign recordkeeping only.
2. **Non-Federal Source Detail:** Transferable clean-energy credits (§§ 48E, 45W, 45X, 30C) registered in the IRS Energy Credits Online portal.
3. **Bridge Facility:** 12-month revolving credit line collateralized by registered credits; no HUD funds pledged or guaranteed.
4. **Program Income Classification:** Treated as leveraged non-federal funds per HUD Handbook 7610.1 Rev-5 § 6-5(B)(1)(a) and 2 CFR 200.307(e)(1).
5. **Sovereignty Harmony Statement:** The Loc Nation Dollar (LND) functions as an internal parity-based ledger instrument within SOLN for restitution and development allocations. All HUD-related audits and transactions remain in USD, ensuring full compliance with 24 CFR Part 214 and 31 CFR Part 206 while honoring SOLN 's sovereign self-funding framework.

Notes for Reviewers

1. **Currency Presentation:** USD values are official for HUD reporting. The internal ledger mirrors these transactions in LND, the SOLN sovereign accounting unit pegged at 1 LND = \$ 750 USD (ISO 4217 user-assigned code LND).
2. **Non-Federal Source Detail:** Derived from transferable clean-energy credits (48E, 45W, 45X, 30C) registered in the IRS Energy Credits Online portal.
3. **Bridge Facility:** Twelve-month revolving credit line collateralized by registered credits; no HUD funds pledged.
4. **Program Income Classification:** Treated as *leveraged non-federal revenue* per HUD Handbook 7610.1 Rev-5 § 6-5(B)(1)(a) and 2 CFR 200.307(e)(1).

Certification

I certify that the above budget accurately reflects the funding plan and conversion methodology for the State of Loc Nation Global Public Benefit Corporation's Housing-Counseling Program and that all non-federal sources are verifiable and compliant with HUD program requirements.

Rev. Dr. C. Clement

10/30/25

Signed: Rev. Dr. Christina Loren Clement

Date: _____

Documented Sources of Income Checklist

(State of Loc Nation Global Public Benefit Corporation | EIN 88-3400910)

Please check all boxes that apply and attach documentation behind each tab.

<input checked="" type="checkbox"/> Source Category	Supporting Document Type	Verification / Notes (Amount & Date)
<input type="checkbox"/> 1 – HUD Grant Funds	HUD Award Letter or Grant Agreement	— Pending award notification
<input type="checkbox"/> 2 – IRS Clean-Energy Credit Proceeds	IRS Energy Credits Online registration confirmation numbers + Form 3800 draft summary	Attach PDF confirmations for 48E, 45X, 45W, 30C projects
<input type="checkbox"/> 3 – Forward-Sale Agreements	Executed forward purchase agreements or letters of intent from credit buyers or green banks	Indicates expected transfer value (≈ 92 % of credit face value)
<input type="checkbox"/> 4 – Bridge Loan / Credit Facility	Commitment letter or term sheet from bank or fund + board authorization	Short-term working capital secured by registered credits
<input type="checkbox"/> 5 – LND Treasury Ledger & Conversion Certificate	Certified ledger showing parity (1 LND = \$ 750 USD) and conversion schedule	Confirms dual-currency tracking for self-funded revenues
<input type="checkbox"/> 6 – Audited Financial Statements / Bank Verification	FY 2024 audit report or latest bank statement with average balance	Demonstrates liquidity to support operations

- 7 – Donations / Philanthropic Support Donation letters or deposit records Optional community support evidence
- 8 – Program Income (Fees / Services) Invoices or client fee logs If applicable to counseling services

Certification

I certify that the sources listed above are documented, verifiable, and support the budget for HUD Housing-Counseling and Mortgage-Relief operations for FY 2025. All non-federal revenues are compliant with HUD Handbook 7610.1 Rev-5 and 2 CFR § 200.307(e)(1).

Signature: Rev. Dr. C. Clement Date: 10/30/35
 Name / Title: Rev. Dr. Christina Loren Clement, President

Sources of Income (Support for Budget)

Source	Description	Annual Value (USD Eq.)
Internal Trust Allocation	Funding from Clement Dynasty Trust & State of Loc Nation Central Treasury Account	\$ 7,500
Program Revenue / Donations	Voluntary LND donations converted to USD through designated bank account	\$ 5,000

Source	Description	Annual Value (USD Eq.)
Consulting & Advisory Services	Compliance and economic justice training for partner municipalities	\$ 3,000
In-Kind Support	Office space and equipment owned by SOLNGPBC HQ	\$ 1,000
Total Income Support		\$ 16,500 USD Equivalent

Statement of Accounting and HUD Compliance

All financial statements are maintained in dual-currency format. LND functions as a self-funded sovereign instrument for internal transactions under State of Loc Nation law, while USD is used for all HUD and Treasury reporting until sandbox testing is completed and regulatory integration is approved by FinCEN and HUD program auditors.

Certifying Officer’s Statement

I certify that this budget represents a true and accurate statement of the projected financial operations of the State of Loc Nation Global Public Benefit Corporation for its Housing Counseling Program for FY 2025-2026. The organization operates on a self-funded basis through its Loc Nation Dollar (LND) restitution ledger and converts funds to U.S. dollars for federal compliance and audit purposes.

Signed: Rev. Dr. Christina Loren Clement

Title: President & Head of Legal and Financial Matters

Date: _____

Housing Counseling Work Plan (a–l)

State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

Program Title: Notice of Restitution Payment Program for Redlined Mortgage Accounts

Prepared by: Rev. Dr. Christina Loren Clement

EIN: 88-3400910 **DUNS:** 110391058

Date: ___ October 30, 2025 ___

a. Agency Profile

State of Loc Nation Global Public Benefit Corporation (SOLNGPBC) is a registered public-benefit and research organization headquartered in Atlanta, Georgia, operating under the Maroon Treaty; SOLN Restitution Act governance framework. The Government was established to address systemic redlining, mortgage discrimination, and economic exclusion through direct counseling, restitution financing, and homeownership restoration.

SOLNGPBC integrates housing counseling, clean-energy redevelopment, and financial literacy as a unified model of restorative housing justice. The agency operates under the *Restitution Treasury Initiative*—an umbrella that includes housing-counseling services, legal assistance for mortgage redress, and partnerships with HUD-aligned programs and city housing departments.

b. Needs and Target Market Analysis

The service area includes the **Atlanta metropolitan region, DeKalb, Fulton, and Clayton** counties, with expansion planned into redlined census tracts nationally through affiliate partnerships. HUD-designated data and SOLN mapping confirm persistent gaps in homeownership, affordable lending, and post-foreclosure recovery among African-American and low-income households.

Primary client populations:

- Formerly redlined homeowners facing foreclosure or denial of credit;
 - Renters seeking transition to ownership;
 - First-time buyers from minority(SOLN defined-majority) and faith-based communities;
 - Senior or disabled homeowners requiring energy-efficient retrofits;
 - Veterans and returning citizens re-entering the housing market.
-

c. Service Delivery

Counseling and education services include:

1. Pre-purchase counseling and financial readiness training;
2. Post-purchase and sustainable homeownership education;
3. Rental counseling and tenant-rights education;
4. Foreclosure-prevention and default counseling (loan modification, loss-mitigation assistance);
5. Home equity, HECM, and reverse-mortgage guidance for seniors;
6. Energy-efficiency improvement counseling (solar, retrofits, HUD 203(k));
7. Fair-housing education and complaint referral;
8. Disaster recovery and mortgage-relief processing.

Counseling is provided in person, virtually, and through group workshops, supported by digital platforms and translation services.

d. Workload and Volume Projections

Service Type	Clients (FY2025)	Delivery Mode
Pre-Purchase & Credit Readiness	500	Group / Individual
Rental Counseling	200	Group / Online
Foreclosure Prevention	300	Individual
Post-Purchase / Sustainability	150	Group
Energy-Efficiency & Retrofit Counseling	250	Individual / Group
Total Clients Served	1,400	—

e. Marketing and Outreach Strategy

SOLNGPBC conducts outreach through:

- Partnerships with local housing authorities, city councils, and neighborhood associations;
- Faith-based outreach through *Loc Community Association* chapters;
- Radio and digital media (iHeartRadio's *The Rev Dr Christina Clements Restitution* show);
- Social media campaigns targeting redlined zip codes;
- Coordination with legal-aid societies, banks, and real-estate professionals.

Bilingual and accessible materials are distributed both online and through partner agencies.

f. Fee Policy and Fee Schedule

All foreclosure-prevention and default-resolution counseling are **free of charge** to the client. Pre-purchase or credit-readiness workshops may include a nominal administrative fee (\$125–\$150) waived for low-income clients. Counseling income is recorded as *Program Income* per 2 CFR § 200.307(e)(1).

g. Performance Goals and Evaluation

Key metrics:

- 70 % of pre-purchase clients obtain mortgage approval within 12 months;
- 80 % of foreclosure-risk clients avoid foreclosure through mitigation;
- 90 % client satisfaction rate;
- Annual increase in energy-efficient housing retrofits (≥ 15 % year-over-year).

Performance is evaluated quarterly through counselor file reviews, client surveys, and HUD-CMS reports.

h. Recordkeeping, Data Systems, and Reporting

The agency utilizes a **HUD-approved Client Management System (CMS)** integrated with the Loc Nation Treasury Ledger for cross-reporting of counseling, payment assistance, and energy-credit funding.

All client files (digital and paper) are secured per HUD Handbook 7610.1 Rev-5 § 6-9. Data is reported to HUD through the Housing Counseling System (HCS) and to SOLN 's internal Treasury for audit.

i. Quality Control Plan

Quarterly file reviews are conducted by the Program Director. A random sample (10 %) of all client files is audited for compliance, completeness, and counselor certification. Findings are documented, and corrective actions are tracked.

Annual peer reviews are completed across SOLN affiliate offices to maintain consistency in counseling quality.

j. HUD-Certified Counselors and Staff Training

The State of Loc Nation Global Public Benefit Corporation (SoLN GPBC) requires all housing counselors and support personnel to maintain the highest standards of professionalism, ethics, and cultural competence.

All counselors must hold **HUD Housing Counselor Certification** in accordance with the *Housing Counseling Certification Final Rule (FR-5339-F-03)* prior to providing one-on-one or group counseling services.

Continuing education is mandatory and includes, at a minimum:

- Annual HUD and NeighborWorks training in housing-counseling program updates and client-service delivery;
- **Fair-Housing Act, Equal Credit Opportunity Act (ECOA)**, and consumer-protection compliance workshops;
- **SoLN-sponsored professional-development sessions** covering clean-energy finance, restitution-fund documentation, and mortgage-relief program procedures;
- Annual **Ethics and Professional Conduct** seminar emphasizing impartiality, confidentiality, and accountability in service.

The **Human Resources Division** maintains a comprehensive log of each staff member's training history, certificates, and continuing-education credits. These records are reviewed during internal audits and are available for HUD program monitoring.

Counselors are also encouraged to pursue advanced certifications in energy-efficiency housing counseling, financial coaching, and restorative-justice leadership to strengthen SoLN's capacity as a sovereign, multidisciplinary housing-stability agency.

k. Funding Sources and Budget Alignment

The Housing Counseling Program is financed through:

- **HUD Housing Counseling Grants (pending approval);**
- **Transferable Clean-Energy Credits** under IRC §§ 6417 – 6418 (48E, 45X, 30C, 45W);
- **Bridge financing** from accredited green-finance institutions;
- **Loc Nation Dollar (LND)** parity system (1 LND = \$ 750 USD) supporting internal allocations;
- **Donations and community contributions.**

All non-federal sources are treated as leveraged funds per HUD 7610.1 Rev-5 § 6-5(B)(1)(a).
The FY 2025 Budget (attached) outlines these revenue streams and their allocations.

I. Fair Housing and Civil Rights Compliance

SOLNGPBC ensures equal access to housing opportunities regardless of race, color, national origin, religion, sex, familial status, disability, age, or source of income.

The agency maintains an active **Affirmative Marketing Plan** and coordinates with the **HUD Office of Fair Housing and Equal Opportunity (FHEO)** for complaint referrals.

Physical and digital accessibility standards are enforced per Section 504 of the Rehabilitation Act.

All staff sign the Code of Conduct and Civil-Rights Compliance Agreement annually.

Certification

I certify that this Housing Counseling Work Plan accurately reflects the operations, funding structure, and compliance obligations of the State of Loc Nation Global Public Benefit Corporation, and that all activities conform to HUD Handbook 7610.1 Rev-5 and 24 CFR Part 214.

Signed: Rev Dr C. Loren

Date: 10/30/25

Name / Title: Rev. Dr. Christina Loren Clement, President

Housing Counseling Work Plan (a–l)

State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

Program Title: *Notice of Restitution Payment Program for Redlined Mortgage Accounts*

Prepared by: Rev. Dr. Christina Loren Clement

EIN: 88-3400910 **DUNS:** 110391058

Date: _October 30, 2025_____

a. Agency Profile

State of Loc Nation Global Public Benefit Corporation (SOLNGPBC) is a registered public-benefit and research organization headquartered in Atlanta, Georgia, operating under the Marron Treaty governance framework. The Corporation was established to address systemic redlining, mortgage discrimination, and economic exclusion through direct counseling, restitution financing, and homeownership restoration.

SOLNGPBC integrates housing counseling, clean-energy redevelopment, and financial literacy as a unified model of restorative housing justice. The agency operates under the *Restitution Treasury Initiative*—an umbrella that includes housing-counseling services, legal assistance for mortgage redress, and partnerships with HUD-aligned programs and city housing departments.

b. Needs and Target Market Analysis

The service area includes the **Atlanta metropolitan region, DeKalb, Fulton, and Clayton** counties, with expansion planned into redlined census tracts nationally through affiliate partnerships. HUD-designated data and SOLN mapping confirm persistent gaps in homeownership, affordable lending, and post-foreclosure recovery among African-American and low-income households.

Primary client populations:

- Formerly redlined homeowners facing foreclosure or denial of credit;
 - Renters seeking transition to ownership;
 - First-time buyers from minority and faith-based communities;
 - Senior or disabled homeowners requiring energy-efficient retrofits;
 - Veterans and returning citizens re-entering the housing market.
-

c. Service Delivery

Counseling and education services include:

1. Pre-purchase counseling and financial readiness training;
2. Post-purchase and sustainable homeownership education;

3. Rental counseling and tenant-rights education;
4. Foreclosure-prevention and default counseling (loan modification, loss-mitigation assistance);
5. Home equity, HECM, and reverse-mortgage guidance for seniors;
6. Energy-efficiency improvement counseling (solar, retrofits, HUD 203(k));
7. Fair-housing education and complaint referral;
8. Disaster recovery and mortgage-relief processing.

Counseling is provided in person, virtually, and through group workshops, supported by digital platforms and translation services.

d. Workload and Volume Projections

Service Type	Clients (FY2025)	Delivery Mode
Pre-Purchase & Credit Readiness	500	Group / Individual
Rental Counseling	200	Group / Online
Foreclosure Prevention	300	Individual
Post-Purchase / Sustainability	150	Group
Energy-Efficiency & Retrofit Counseling	250	Individual / Group
Total Clients Served	1,400	—

e. Marketing and Outreach Strategy

SOLNGPBC conducts outreach through:

- Partnerships with local housing authorities, city councils, and neighborhood associations;
- Faith-based outreach through *Loc Community Association* chapters;
- Radio and digital media (iHeartRadio’s *The Rev Dr Christina Clements Restitution* show);
- Social media campaigns targeting redlined zip codes;
- Coordination with legal-aid societies, banks, and real-estate professionals.

Bilingual and accessible materials are distributed both online and through partner agencies.

f. Fee Policy and Fee Schedule

All foreclosure-prevention and default-resolution counseling are **free of charge** to the client. Pre-purchase or credit-readiness workshops may include a nominal administrative fee (\$25–\$50) waived for low-income clients. Counseling income is recorded as *Program Income* per 2 CFR § 200.307(e)(1).

g. Performance Goals and Evaluation

Key metrics:

- 70 % of pre-purchase clients obtain mortgage approval within 12 months;
- 80 % of foreclosure-risk clients avoid foreclosure through mitigation;
- 90 % client satisfaction rate;
- Annual increase in energy-efficient housing retrofits (≥ 15 % year-over-year).

Performance is evaluated quarterly through counselor file reviews, client surveys, and HUD-CMS reports.

h. Recordkeeping, Data Systems, and Reporting

The agency utilizes a **HUD-approved Client Management System (CMS)** integrated with the Loc Nation Treasury Ledger for cross-reporting of counseling, payment assistance, and energy-credit funding.

All client files (digital and paper) are secured per HUD Handbook 7610.1 Rev-5 § 6-9. Data is reported to HUD through the Housing Counseling System (HCS) and to SOLN 's internal Treasury for audit.

i. Quality Control Plan

Quarterly file reviews are conducted by the Program Director. A random sample (10 %) of all client files is audited for compliance, completeness, and counselor certification. Findings are documented, and corrective actions are tracked.

Annual peer reviews are completed across SOLN affiliate offices to maintain consistency in counseling quality.

j. HUD-Certified Counselors and Staff Training

All counselors complete HUD-certification under the Housing Counseling Certification Final Rule (FR-5339-F-03). Continuing education includes:

- Annual HUD and NeighborWorks training;
- Fair-Housing and ECOA compliance workshops;
- SOLN -sponsored training on clean-energy finance and mortgage-relief documentation.

The HR log and certificates are maintained in each counselor's file.

k. Funding Sources and Budget Alignment

The Housing Counseling Program is financed through:

- **HUD Housing Counseling Grants (pending approval);**
- **Transferable Clean-Energy Credits** under IRC §§ 6417 – 6418 (48E, 45X, 30C, 45W);
- **Bridge financing** from accredited green-finance institutions;
- **Loc Nation Dollar (LND)** parity system (1 LND = \$ 750 USD) supporting internal allocations;
- **Donations and community contributions.**

All non-federal sources are treated as leveraged funds per HUD 7610.1 Rev-5 § 6-5(B)(1)(a).

The FY 2025 Budget (attached) outlines these revenue streams and their allocations.

I. Fair Housing and Civil Rights Compliance

SOLNGPBC ensures equal access to housing opportunities regardless of race, color, national origin, religion, sex, familial status, disability, age, or source of income.

The agency maintains an active **Affirmative Marketing Plan** and coordinates with the **HUD Office of Fair Housing and Equal Opportunity (FHEO)** for complaint referrals.

Physical and digital accessibility standards are enforced per Section 504 of the Rehabilitation Act.

All staff sign the Code of Conduct and Civil-Rights Compliance Agreement annually.

Certification

I certify that this Housing Counseling Work Plan accurately reflects the operations, funding structure, and compliance obligations of the State of Loc Nation Global Public Benefit Corporation, and that all activities conform to HUD Handbook 7610.1 Rev-5 and 24 CFR Part 214.

Signed: Rev. Dr. C. Clement

Date: 10/30/2025

Name / Title: Rev. Dr. Christina Loren Clement, President

Client Disclosure Notice

This notice under 24 CFR § 214.303(e) and Handbook 7610.1 Rev-5, Chapter 6

(Attachment B — Form HUD-9900)

Agency: State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

Program: Notice of Restitution Payment Program for Redlined Mortgage Accounts

EIN: 88-3400910 **DUNS:** 110391058

Address: 2962 Ember Drive, Decatur GA 30034 | 8 The Green, Suite A, Dover DE 19901

Phone: 678-780-5557 **Email:** info@stateoflocnation.com

1. Purpose of Counseling

You are receiving housing counseling services from a HUD-approved agency.

Our purpose is to educate and assist you in resolving housing and mortgage issues, including pre-purchase, rental, foreclosure prevention, credit readiness, and post-purchase sustainability.

2. Counselor Independence

Your counselor does **not** guarantee loan approval or funding.

Counselors provide unbiased education and recommendations based on HUD standards.

You are **not obligated** to use any product, lender, or service recommended or referenced during counseling.

3. Funding Sources

State of Loc Nation GPBC is supported by:

- Pending **HUD Housing Counseling Grants**;
- **Clean-Energy Credit Proceeds** registered under IRC §§ 6417–6418 (48E, 45X, 30C, 45W);
- **Bridge Financing** from accredited green-finance institutions;
- **Loc Nation Dollar (LND)** internal parity currency (1 LND = \$ 750 USD);
- Private donations and community contributions.

None of these sources influence the quality or content of your counseling services.

4. Client Privacy

All personal and financial information is kept confidential and will not be disclosed to any outside organization without your written consent, except as required by law or HUD regulations.

5. Conflict-of-Interest Policy

Our counselors and staff are prohibited from steering clients toward specific lenders, real-estate agents, or products.

We do not receive referral fees, commissions, or incentives from outside entities in exchange for client business.

6. Fair Housing & Equal Opportunity

Services are provided regardless of race, color, national origin, religion, sex, familial status, disability, age, or source of income.

Clients who believe they have experienced housing discrimination may file a complaint with:

HUD Office of Fair Housing & Equal Opportunity (FHEO)

451 7th Street SW, Room 5204, Washington, DC 20410

(800) 669-9777 | www.hud.gov/fairhousing

7. Client Acknowledgment

By signing below, I acknowledge that I have received, read, and understand this disclosure notice. I also acknowledge that I am free to choose any real-estate, lending, or housing-related service provider that best meets my needs.

Client Name Signature Date

Counselor Name Signature Date

Attachment C — Community Resources and Referral List

Agency: State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

Program: Notice of Restitution Payment Program for Redlined Mortgage Accounts

Prepared by: Rev. Dr. Christina Loren Clement

EIN: 88-3400910 **DUNS:** 110391058

Address: 2962 Ember Drive, Decatur GA 30034 | 8 The Green, Suite A, Dover DE 19901

Phone: 678-780-5557 **Email:** info@stateoflocnation.com

Purpose

To ensure comprehensive assistance for clients, SOLNGPBC partners with a wide range of community resources and organizations providing housing, financial, legal, and social services. Referrals are made based on client needs identified during counseling sessions.

A. Housing Assistance & Mortgage Relief

Organization	Service Type	Contact
Georgia Department of Community Affairs (DCA)	Mortgage and rental assistance, housing grants	www.dca.ga.gov
Atlanta Housing Authority (AHA)	Affordable housing and Section 8 programs	230 John Wesley Dobbs Ave NE, Atlanta, GA – (404) 892-4700
City of South Fulton Housing Department	Mortgage relief and first-time homebuyer programs	Corey.Adams@cityofsouthfultonga.gov
State of Loc Nation Restitution Fund	Foreclosure-prevention and loan modification support in redlined communities	info@stateoflocnation.com

B. Legal & Consumer Protection Services

Organization	Service Type	Contact
Atlanta Legal Aid Society	Foreclosure defense, eviction prevention, consumer law	(404) 377-0701
Pro Bono Partnership of Atlanta	Legal support for nonprofit homeowners	www.pbpatl.org
HUD Office of Fair Housing & Equal Opportunity (FHEO)	Fair housing complaints and civil rights enforcement	(800) 669-9777

C. Financial Literacy & Credit Counseling Partners

Organization	Service Type	Contact
LOC Community Association Credit Union	LND/credit conversion accounts, financial literacy	members@loccommunityassociation.com
Navy Federal Credit Union	Mortgage pre-qualification and first-time homebuyer support	(888) 842-6328
Urban League of Greater Atlanta	Credit counseling, entrepreneurship, and savings programs	www.ulgatl.org

D. Employment & Workforce Development

Organization	Service Type	Contact
Georgia Department of Labor (GDOL)	Job readiness, unemployment assistance	dol.georgia.gov
WorkSource Atlanta Regional	Workforce and re-entry programs	(404) 463-3327
State of Loc Nation Trust	Community job fairs, re-entry employment	info@stateoflocnation.com

E. Energy Efficiency & Home Improvement

Organization	Service Type	Contact
Home Depot Foundation	Grants for veteran home improvements	www.homedepotfoundation.org
Georgia Power Energy Efficiency Program	Weatherization and retrofit rebates	(888) 660-5890
SOLN Clean Energy Credit Division	Transferable clean-energy credits (48E/45X) and retrofit funding	treasury@stateoflocnation.com

F. Mental Health & Family Support

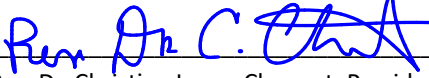
Organization	Service Type	Contact
Dynasty Healing Foundation (Ghana)	Spiritual counseling, family trauma recovery	dynastyhealingfoundation@gmail.com
Georgia Crisis & Access Line (GCAL)	24/7 mental health crisis support	1-800-715-4225
Community Faith-Based Partners	Family support, conflict resolution, and grief care	Through local churches and SOLN affiliates

G. Emergency Assistance & Homeless Prevention

Organization	Service Type	Contact
United Way of Greater Atlanta (2-1-1)	Emergency housing and utility assistance	Dial 2-1-1
Salvation Army of Metro Atlanta	Homeless prevention and temporary housing	(404) 486-2900
City of Atlanta Continuum of Care	Coordinated entry for homeless individuals and families	www.atlantacoc.org

Certification

I certify that the above community resources and partner agencies have been verified as active organizations serving residents of Atlanta, DeKalb, Fulton, and Clayton Counties and that SOLNGPBC maintains referral relationships with each to ensure comprehensive housing-counseling support.

Signature:  **Date:** 10/30/25
Name / Title: Rev. Dr. Christina Loren Clement, President

Attachment D — Agency Staff Code of Conduct Statement

Agency: State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

Program: Notice of Restitution Payment Program for Redlined Mortgage Accounts

Prepared by: Rev. Dr. Christina Loren Clement, President

EIN: 88-3400910 **DUNS:** 110391058

Address: 2962 Ember Drive, Decatur GA 30034 | 8 The Green, Suite A, Dover DE 19901

Phone: 678-780-5557 **Email:** info@stateoflocnation.com

1. Purpose

This Code of Conduct establishes ethical and professional standards for all staff, counselors, officers, and board members engaged in housing-counseling activities under HUD 24 CFR Part 214.

All personnel must uphold the highest degree of honesty, fairness, and impartiality in delivering services to the public.

2. Professional Integrity

- Counselors shall provide accurate, unbiased, and comprehensive information to clients.
 - No employee shall make false or misleading statements regarding loan terms, foreclosure outcomes, or government benefits.
 - Staff must perform duties consistent with HUD Handbook 7610.1 Rev-5, Ch. 6-10, and the Housing Counseling Certification Final Rule (FR-5339-F-03).
-

3. Conflict of Interest

- No staff member, counselor, or board officer may accept compensation, commissions, gifts, or favors from lenders, servicers, builders, or other third parties for referring or steering clients.
 - Employees and their immediate family members may not participate in counseling transactions where they have a financial or personal interest.
 - All outside employment or affiliations that might appear to influence professional judgment must be disclosed in writing to the President or Compliance Officer.
-

4. Confidentiality

- Client financial, personal, or identifying information shall remain strictly confidential and used solely for legitimate counseling or program-reporting purposes.
 - Files are maintained in secured systems consistent with HUD data-security standards and SOLN Treasury privacy policies.
 - Information may be released only with written client consent or as required by law.
-

5. Fair Housing and Equal Opportunity

All personnel must treat clients fairly and without discrimination on the basis of race, color, national origin, religion, sex, familial status, disability, age, sexual orientation, gender identity, or source of income.

Violations are grounds for immediate disciplinary action and referral to the HUD Office of Fair Housing and Equal Opportunity (FHEO).

6. Prohibited Conduct

Employees shall not:

- Misrepresent SOLNGPBC’s affiliation with HUD or government agencies;
- Offer or guarantee loan approvals or outcomes;
- Request or accept client payments beyond the approved fee schedule;
- Use SOLNGPBC resources or Loc Nation Dollar (LND) instruments for personal gain;
- Engage in political activity or public statements that could be construed as representing HUD positions without authorization.

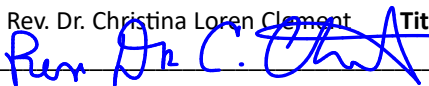
7. Reporting Violations

Suspected violations must be reported immediately to the Program Director or Compliance Officer. Reports may also be submitted anonymously to ethics@stateoflocnation.com. Retaliation against good-faith reporters is strictly prohibited.

8. Acknowledgment and Certification

I, the undersigned, acknowledge that I have received, read, and understand the **State of Loc Nation Global Public Benefit Corporation Code of Conduct**, and I agree to abide by its terms as a condition of employment or board service.

Name (Print) Position / Title Signature Date

Authorized by: Rev. Dr. Christina Loren Clement **Title:** President
Signature:  **Date:** 10/30/25

Handbook 7610.1 Rev-5, § 6-6(A)(5).

Attachment E — Photographs of Office (Exterior & Interior)

Agency: State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

Program: Notice of Restitution Payment Program for Redlined Mortgage Accounts

Prepared by: Rev. Dr. Christina Loren Clement

EIN: 88-3400910 **DUNS:** 110391058

Address: 2962 Ember Drive, Decatur GA 30034 | 8 The Green, Suite A, Dover DE 19901 **Phone:** 678-780-5557

Email: info@stateoflocnation.com

A. Exterior Photos (3–5 Images)

Include clear daylight photographs showing:

1. **Building Front & Signage** – Show the entrance, street address, and any State of Loc Nation or HUD Housing Counseling signage.
2. **Accessibility Features** – Ramps, parking, door access, or elevators that demonstrate ADA compliance.
3. **Neighborhood Context** – A wider shot to show safety, parking availability, and public-transport access.

Caption Example:

Figure 1 – Exterior view of SOLNGPBC Headquarters, 123 Faith Street SW, Atlanta GA 30310, showing main signage and accessible entrance.

B. Interior Photos (5–7 Images)

Include labeled images of key client-service areas:

1. **Reception / Lobby Area** – Front desk and client-intake area.
2. **Private Counseling Room** – Demonstrates confidentiality.
3. **Training / Workshop Room** – Classroom or conference space for group education.
4. **Staff Workstations / CMS Area** – Shows secure computer terminals for HUD-approved client-management system.
5. **Records Storage / File Room** – Locked cabinets or secure digital-records server area.
6. **Energy Resource Display (optional)** – Highlighting clean-energy or sustainability materials connected to your Restitution Program.

Caption Example:

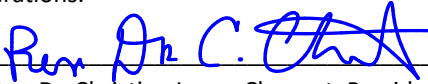
Figure 4 – Private Counseling Office ensuring client confidentiality and data-security compliance per HUD 7610.1 § 6-9.

C. Formatting Instructions

- Save each photo as **JPEG or PNG (≥ 300 dpi)**.
 - Label each: “Figure 1 – Exterior Front,” “Figure 2 – Lobby,” etc.
 - Insert into a single **PDF document (≤ 15 MB)**.
 - Add captions and the agency header on each page.
 - Page 1 title: “Attachment E – Office Photographs (Exterior & Interior).”
-

D. Certification

I certify that the attached photographs accurately represent the official business location of the State of Loc Nation Global Public Benefit Corporation and that this office is accessible to the public and suitable for HUD Housing-Counseling operations.

Signature:  Date: 10/30/25
Name / Title: Rev. Dr. Christina Loren Clement, President

Attachment F — List of Other HUD Programs Participated In

Agency: State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

Program: Notice of Restitution Payment Program for Redlined Mortgage Accounts

Prepared by: Rev. Dr. Christina Loren Clement

EIN: 88-3400910 **DUNS:** 110391058

Address: 2962 Ember Drive, Decatur GA 30034 | 8 The Green, Suite A, Dover DE 19901

Phone: 678-780-5557 **Email:** info@stateoflocnation.com

Purpose

This attachment identifies all other HUD-related or HUD-funded programs with which the agency participates, collaborates, or intends to coordinate resources.

Participation in these programs ensures service integration for mortgage-relief, housing development, and community-renewal initiatives.

A. Active or Collaborative HUD Programs

Program / Division	Type of Participation	Description / Purpose
Community Development Block Grant (CDBG)	Community-partner	Supports neighborhood rehabilitation and energy-efficient housing restoration in redlined census tracts.
HOME Investment Partnerships Program (HOME)	Applicant / Sub-recipient partner	Funds affordable-housing development in partnership with local governments and HUD-approved developers.
FHA Single-Family Housing Programs	Outreach and mortgage-relief coordination	Works with FHA Resource Center (SRN 07488320) on redlined-mortgage restitution and borrower counseling.
Housing Counseling Certification Program	Compliance and staff training	All SOLN counselors complete HUD certification under FR-5339-F-03.
Fair Housing Initiative Program (FHIP)	Referral partner	Provides fair-housing complaint intake and coordination with HUD FHEO.
Continuum of Care (CoC)	Coordinated entry partner	Assists homeless and re-entry populations through transitional-housing counseling.
HUD Energy & Sustainability Initiatives	Innovative funding collaboration	Integrates clean-energy credits (IRC §§ 6417–6418) with HUD rehabilitation funding to promote energy-efficient housing.

B. Pending or Planned HUD Engagements

Program / Division	Status	Planned Action / Outcome
Neighborhood Stabilization Program (NSP)	Pending MOU with City of Atlanta Housing Dept.	Rehabilitation of foreclosed and abandoned properties in redlined zones.
Section 108 Loan Guarantee Program	Application under review for FY 2026	Financing for Loc Nation Housing Credit Fund for reinvestment loans.
HUD Healthy Homes Program	Planning phase for FY 2025	Integration of lead-hazard and energy-retrofit education for low-income households.

C. Alignment with Housing Counseling Program

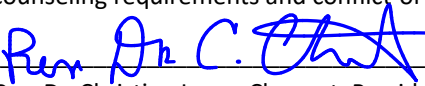
All HUD-related partnerships reinforce the mission of the *Notice of Restitution Payment Program for Redlined Mortgage Accounts*, ensuring that clients receiving counseling also have access to:

- Affordable mortgage products,
- Energy-efficient home rehabilitation, and
- Fair-housing enforcement resources.

These collaborations enable SOLNGPBC to deliver comprehensive, outcome-oriented housing counseling in alignment with HUD 24 CFR Part 214 and Handbook 7610.1 Rev-5.

Certification

I certify that the above information accurately represents all HUD programs in which the State of Loc Nation Global Public Benefit Corporation currently participates or plans to engage, and that all participation is consistent with HUD housing-counseling requirements and conflict-of-interest policies.

Signature:  Date: 10/30/25
Name / Title: Rev. Dr. Christina Loren Clement, President

Attachment G — Board of Directors Authorization Letter

Agency: State of Loc Nation Global Public Benefit Corporation (SOLNGPBC)

Program: Notice of Restitution Payment Program for Redlined Mortgage Accounts

Prepared by: Rev. Dr. Christina Loren Clement, President

EIN: 88-3400910 **DUNS:** 110391058

Address: 2962 Ember Drive, Decatur GA 30034 | 8 The Green, Suite A, Dover DE 19901

Phone: 678-780-5557 **Email:** info@stateoflocnation.com

Board Resolution

WHEREAS, the Board of Directors of the State of Loc Nation Global Public Benefit Corporation (“the Corporation”) recognizes the urgent need for housing counseling, foreclosure-prevention, and mortgage-relief services for residents of redlined and under-served communities within the United States; and

WHEREAS, the Corporation has established the *Notice of Restitution Payment Program for Redlined Mortgage Accounts* to provide housing counseling and education services in accordance with HUD 24 CFR Part 214 and HUD Handbook 7610.1 Rev-5; and

WHEREAS, participation as a HUD-Approved Housing Counseling Agency will advance the Corporation’s mission to promote equitable housing, economic justice, and community rehabilitation; and

WHEREAS, the Corporation has reviewed and approved the proposed Housing Counseling Work Plan (a–l), FY 2025 Budget, and supporting documents prepared for submission to the U.S. Department of Housing and Urban Development.

NOW, THEREFORE, BE IT RESOLVED THAT:

1. The Board of Directors hereby authorizes the establishment of a **HUD-Approved Housing Counseling Program** under the *Notice of Restitution Payment Program for Redlined Mortgage Accounts*.
 2. The Board confirms that the Corporation will comply with all applicable federal regulations, including 24 CFR Part 214, 2 CFR Part 200, and HUD Handbook 7610.1 Rev-5 and SOLN Restitution Act.
 3. The Board designates **Rev. Dr. Christina Loren Clement**, President, as the official representative authorized to execute and submit all required forms, certifications, and agreements on behalf of the Corporation.
 4. The Board directs the Corporate Secretary to include this resolution in the official minutes and to maintain it as permanent record supporting the HUD Application (Form HUD-9900).
-

Adopted and Approved by the Board of Directors

Date of Resolution: October 30, 2025 _____

Name	Title	Signature	Date
CHRISTINA LOREN CLEMENT LLC _____	Board Chair / Chairwoman	CHRISTINA LOREN CLEMENT LLC _____	OCT 30, 2025_
CLEMENT DYNASTY DYNASTY TRUST _____	Secretary / Treasurer	CLEMENT DYNASTY DYNASTY TRUST ____	OCT 30, 2025_
Rev Dr Christina Clement _____	Director/President	Rev Dr Christina Clement	OCT 30, 2025_

Certification

I, the undersigned Secretary of the State of Loc Nation Global Public Benefit Corporation, hereby certify that the foregoing resolution was duly adopted by the Board of Directors at a meeting held on the date indicated above and that it remains in full force and effect.

Secretary Signature: Rev Dr C. Clement Date: 10/30/25
 Printed Name: On behalf of Christina Loren Clement LLC

NOTARIAL ACKNOWLEDGMENT

State of _____
 County of _____

On this ___ day of _____, 2025, before me, the undersigned Notary Public, personally appeared Rev. Dr. Christina Loren Clement, known to me (or satisfactorily proven) to be the person whose name is subscribed to this instrument, and acknowledged that she executed it for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Signature of Notary Public: _____
 Printed Name: _____
 My Commission Expires: _____
 [Seal]