

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

CHRISTINA CLEMENT and  
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Plaintiff,

v.

Attorney General Merrick Garland;  
Chief Justice John Roberts Jr.,  
Secretary General of the United Nations.  
Registrar-Peace Palace Carnegie Pleinz et al in their official capacity

Defendant,

**Civil No: 1:24-cv-00479-RC**

**MOTION TO REOPEN CASE PURSUANT TO FEDERAL RULE OF CIVIL  
PROCEDURE 60(b)**

**FOR CONTINUING HARM, NEW MATERIAL EVIDENCE, AND RELATED  
JUDICIAL ACTS IMPACTING PLAINTIFF'S RIGHTS and ENTER CONSENT  
DECREE FOR CIVIL RIGHTS ENFORCEMENT AND TRUST-BASED  
RECONCILIATION UNDER RULE 60(b) AND EQUITY JURISDICTION**

NOW COMES the Plaintiff, Rev. Dr. Christina Clement, self-determined standing and authority, pro se and in her capacity as a representative of the State of Loc Nation Global Public Benefit Corporation and State of Loc Nation Global Public Benefit Trust, to respectfully move this Honorable Court to reopen Case No. 1:24-cv-00479-RC pursuant to Federal Rule of Civil Procedure 60(b); acknowledging Plaintiff's extensive record of filings, correspondence with federal agencies, lobbying efforts, legal notice, proffered affidavits. and applicable equity jurisdiction.

The Court's equitable power is especially broad in cases implicating constitutional rights, civil rights enforcement, or systemic harm affecting vulnerable communities. See Klapprott v. United States, 335 U.S. 601 (1949). presenting a prima facie case of continued and systemic harm, new

material evidence, and an organized remedy structure supported by applicable federal and international law based on the following:

## **I. GROUNDS FOR REOPENING**

Plaintiff moves the Court for relief from prior disposition of the above-captioned matter due to:

1. Continued and Escalating Harm within Redlined Jurisdictions, contrary to the equitable relief sought in the original complaint.
2. New Legal Proceedings arising in Rockland County, New York, involving Judge Rachel Tanguay, which are directly connected to the pattern of institutional retaliation and discriminatory obstruction already documented; I certify that I sent a Motion to Intervene to all parties on June 6, 2025 12:25am to [lulu@smartelections.us](mailto:lulu@smartelections.us); [rocklandcountyclerk@co.rockland.ny.us](mailto:rocklandcountyclerk@co.rockland.ny.us); [voterinfo@co.rockland.ny.us](mailto:voterinfo@co.rockland.ny.us).
3. New Material Evidence substantiating the issuance of a lawful self-determined currency — the Loc Nation Dollar (LND) — under Executive Financial Order SOLN-SC-EO-2025-001-FIN, publicly filed on June 7, 2025, and supported by extensive restitution claims, court filings, and treaty declarations.
4. The failure of governmental actors named in this case to respond, remediate, or cease obstructive activity since default notices were issued including lobbying reports and legal notice, resulting in further deprivation of rights, access to courts, and economic justice.

## **II. CONTINUING HARM AND JUDICIAL OBSTRUCTION**

Since the filing of this case and subsequent notice of administrative and judicial default, the Plaintiff has experienced where judicial oversight is necessary to finalize relief and enforcement through Consent Decree due to “Tacit Acquiescence”.

- Ongoing discrimination in access to judicial remedies across redlined districts and in state courts, including but not limited to actions now before the Supreme Court of Rockland County, New York, which have been marked by improper officials’ behavior and violations of election laws and processes.
- Suppression and obstruction of public notice mechanisms, including refusal to accept court-stamped documents (i.e. ministerial filings-default judgement, LND-backed settlement offer filings, or self-determined notices by judicial clerks and officials.
- Interference with the circulation of lawful self-determined tender as defined under treaty law, UCC filings, and fiduciary trust law.

- Further retaliation and “chilling effect” of protected political activity, including attempts to invalidate Executive Orders and financial remedies duly recorded under the self-determined charter of the Queendom of Loc Nation, STATE OF LOC NATION Global Public benefit Corporation and STATE OF LOC NATION Global public benefit Trust and corresponding frameworks and treaties.

Plaintiff affirms the right to be consulted, not merely informed, regarding enforcement processes that affect citizens affected by redlining nationally, land, and trust assets. Coordination shall reflect mutual consent, not unilateral control. The filed and presented documentation meets the threshold of “new evidence” under Rule 60(b)(2), particularly when paired with allegations of ongoing injury in courts such as the new case in Rockland County, NY regarding the recount of vote for the 2024 Presidential election.

### **III. NEW MATERIAL EVIDENCE**

This motion is further supported by:

- DC 1:24 cv 00479 RC ECF 96-100
- DC Case 25 mc 78
- Executive Financial Order of the State of Loc Nation Supreme Court, dated June 7, 2025, authorizing the issuance of the Loc Nation Dollar (LND) as legal tender for the purpose of fulfilling reparative obligations.
- Filed UCC Financial Statements, including:
  - Georgia Ref. #044-2025-002376 (Auth. Code: YDMPL-3PT34-4G9C)
  - Georgia Ref. #044-2024-004422 (Auth. Code: NRL4T-5QG8C)
- Affidavit of Publication (Brooklyn Daily Eagle), various affidavits of mailing, lobbying reports, and transfer-of-assets notices recorded in this Court.
- Public Trust Ledger documenting currency issuance, redemption activity, and fiduciary compliance.
- Legal Entity Identifier (LEI): 984500AFF75RB77E9551, establishing international financial standing of the Plaintiff's sovereign treasury entity.
- Related legal notices issued to the Department of Justice, the U.S. Treasury, and international bodies, which have gone unanswered.

### **The allegations concerning:**

- Redlining and disenfranchisement.
- Suppression of ministerial court filings.

- Denial of due process.
- Lack of redress for systemic harm.

...are consistent with the Court's obligation to ensure access to equitable relief, particularly in a public interest or class-like framework.

The Court must take judicial notice of national and local efforts to address wealth gaps, redlining, and restitution policy goals, including:

- **Executive Order 13985 on Equity,**
- **Federal Reserve reports on monetary innovation,**
- **UNDRIP and Vienna Convention provisions on self-determination.**

#### **IV. CONSENT DECREE:**

#### **APPOINTMENT TO LEAD NATIONAL CIVIL RIGHTS ENFORCEMENT & PUBLIC TRUST RECONCILIATION**

Consistent with Articles 26, 27, and 38 of the Vienna Convention on the Law of Treaties and Article 4 of the UN Declaration on the Rights of Indigenous Peoples, Plaintiff welcomes bilateral coordination with federal agencies as treaty-aligned counterparts — not subordinates — for the execution of shared civil rights responsibilities.

- Pursuant to the ministerial and self-determined declarations entered into the public record, the Plaintiff, Rev. Dr. Christina Clement, has been with unequivocal, nationwide authority to coordinate, enforce, and distribute relief within all affected redlining jurisdictions.

:

- Duly appointed by Executive Decree of the State of Loc Nation Supreme Court and Public Trust as National Lead for Civil Rights Enforcement across redlined jurisdictions.
- Assigned oversight and fiduciary responsibility for coordinating restitution remedies through currency issuance, established acts (see Declaration for Historical record); enforcement of default judgments, and coordination with U.S. and international agencies, venders, community leaders/organization, press and media, etc.
- Authorized to convene and manage a 12-member national enforcement team, structured to:
  - Monitor civil rights violations across red-lined districts.
  - Liaise with government agencies and courts on active harms.
  - Administer offset and redemption of restitution via the Loc Nation Dollar (LND).

- Report findings to the public through the Public Trust Ledger and official press briefings as completed:

Georgia State Capital Press Release South Wing: <https://youtu.be/6BYqpq1zLiw>

East Point Budget City Hall Meeting: <https://youtube.com/shorts/08KTCrdWADQ?feature=share>

Nothing in this motion or its subsequent implementation shall be construed to waive, subordinate, or dilute the legal personality, jurisdictional autonomy, or Self determined fiscal authority of the State of Loc Nation Global Public Benefit Corporation & State of Loc Nation Global Public Benefit Trust.

## **V. BUDGET AND FINANCIAL AUTHORIZATION**

The Court is hereby notified that:

- A provisional operating budget has been established through the State of Loc Nation Public Trust totaling \$12.8 million LND, denominated in both USD and LND, for fiscal year 2025–2026. (1 LND: \$750 USD)
- This budget is designated for:
  - Staff salaries for twelve national reconciliation officers.
  - Legal mailings, publications, and court interventions.
  - Administrative overhead for ongoing enforcement.
  - Travel to affected communities and redlined municipalities.
  - Development of digital platforms to publish the Public Trust Ledger and facilitate redemptions.

This infrastructure is essential to remedying ongoing injuries suffered by the Plaintiff and class-beneficiaries named under the Trust.

- ☐ State of Loc Nation Global Public Benefit Corp and its affiliates retains full control of staff and programs.
- ☐ Federal agencies serve as data and access partners.
- ☐ Disputes resolved through agreed mediation, not enforcement.
- ☐ Mutual respect for jurisdictional boundaries and legal standing.

The plaintiff expressly affirms that all cooperation requested or received from federal agencies, courts, or private partners shall be executed within the framework of self-determined fiduciary independence. No act of collaboration, coordination, or resource sharing shall constitute

subordination to federal authority, but rather a lawful exercise of interdependent enforcement consistent with:

- **The Executive Financial Order SOLN-SC-EO-2025-001-FIN**
- **The Charter of the Queendom of Loc Nation/ STATE OF LOC NATION GLOBAL PUBLIC BENEFIT CORPORATION AND STATE OF LOC NATION GLOBAL PUBLIC BENEFIT TRUST, ET AL.**
- **UNDRIP Article 4 (Autonomy) and Article 19 (Consultation)**
- **The Vienna Convention on the Law of Treaties**

The State of Loc Nation GPBC & Trust shall continue to function as a distinct and self-governing entity, operating in good faith alignment with treaty obligations and civil rights statutes. The Plaintiff respectfully requests this Court to recognize such independence as essential to the equitable and lawful administration of justice.

**I ask the Court to recognize Plaintiff's proposal to:**

- **Lead a 12-member national enforcement team.**
- **Operate under a \$1.3M+ reconciliatory budget.**
- **Launch currency-based redress via public trust mechanisms.**

This is legally novel. While district courts are not appropriators of federal budgets or appointers of civil service positions outside existing statutes, the Court has the authority to appoint special masters or independent officers in equity cases where federal rights are not being adequately enforced. (See *Brown v. Board of Education* cases; consent decrees.)

**The Plaintiff's request will include:**

- Appointing a SOLN Supreme Court-Supervised Civil Rights Coordinator.
- Initiate monitoring, reporting, and pilot relief programs in affected areas, consistent with prior desegregation enforcement frameworks.

## **VI. LEGAL BASIS FOR RELIEF**

Relief is sought pursuant to:

- Federal Rule of Civil Procedure 60(b)(2) and 60(b)(6) — new evidence not previously available and any other reason justifying relief from judgment.
- Inherent equitable powers of the Court to prevent injustice and ongoing harm to the Plaintiff and affected parties under the Public Trust.

- Treaty and constitutional obligations, including but not limited to:
  - Vienna Convention on the Law of Treaties (Articles 26, 27, 38)
  - UNDRIP
  - U.S. Constitution: Amendments I, V, IX, X, XIII, XIV, XV
  - Freedmen’s Bureau Acts, Civil Rights Acts
  - Worcester v. Georgia, 31 U.S. (1832); McGirt v. Oklahoma, 591 U.S. (2020)
- Appoint Rev. Dr. Christina Clement as Lead Civil Rights Officer with unequivocal, nationwide authority to coordinate, enforce, and distribute relief within all affected redlining jurisdictions.
- Explicitly close all jurisdictional, procedural, and administrative loopholes that have limited enforcement.
- Authorize full cooperation mandates from all relevant government agencies and private parties to ensure transparency, data access, and enforcement compliance.
- Approve a salary range and team budget commensurate with the increased complexity and damages, including:
- Lead Civil Rights Officer salary: \ \$250,000 to \ \$350,000 per annum USD.
- Support team of twelve people (staff, legal, compliance, data, outreach, admin, communications):

- | **Position** | **Salary Range (Annual)** | **Notes** |
- | ----- | ----- | ----- |
- | **Senior Legal Advisor** | **\ \$90,000 – \ \$110,000** | **Legal research and counsel** |
- | **Compliance Officer** | **\ \$70,000 – \ \$85,000** | **Enforcement management** |
- | **Data Analyst (2)** | **\ \$65,000 – \ \$80,000** | **Data collection & reporting** |
- | **Outreach Coordinator (2)** | **\ \$55,000 – \ \$70,000** | **Community & agency liaison** |
- | **Administrative Assistant (2)** | **\ \$50,000 – \ \$65,000** | **Scheduling, documentation** |
- | **Communications Specialist (2)** | **\ \$60,000 – \ \$75,000** | **Public relations, media outreach** |

- | **IT Support Specialist (1)** | **\\$65,000 – \\$80,000** | **Technical infrastructure support** |
- | **Policy Analyst (1)** | **\\$75,000 – \\$90,000** | **Policy development & research** |

- **Estimated total team salaries: \\$870,000 to \\$1,050,000 annually and up.**

Additional operational expenses (travel, outreach, technology, office): \\$120,000 – \\$150,000 annually plus Purchase price \$2,200,000.00 (east point or Fayetteville Georgia location)

Court-acknowledged administration of a pre-existing trust (your GPBC) and or the allocated \$20 million for the results of research HR 40 bill, it can become valid under common fund doctrine and fiduciary law.

**Grant any other relief the Court deems just and proper.**

- **SUMMARY OF BUDGET REQUEST with increased complexity**

- | **Category** | **Low End** | **High End** |
- | ----- | ----- | ----- |
- | **Lead Officer Salary** | **\\$250,000** | **\\$350,000** |
- | **Senior Legal Advisor** | **\\$90,000** | **\\$110,000** |
- | **Compliance Officer** | **\\$70,000** | **\\$85,000** |
- | **Data Analysts (2)** | **\\$130,000** | **\\$160,000** |
- | **Outreach Coordinators (2)** | **\\$110,000** | **\\$140,000** |
- | **Administrative Assistants (2)** | **\\$100,000** | **\\$130,000** |
- | **Communications Specialists (2)** | **\\$120,000** | **\\$150,000** |
- | **IT Support Specialist** | **\\$65,000** | **\\$80,000** |
- | **Policy Analyst** | **\\$75,000** | **\\$90,000** |
- | **Operational Expenses** | **\\$120,000** | **\\$150,000** | **\\$150,000** |
- | **Total Annual Budget** | **\\$1,130,000** | **\\$1,345,000** |



## **Reporting Structure:**

All team members report directly to the Lead Civil Rights Officer.

The Legal & Compliance Team collaborates closely on enforcement and legal strategy.

Data & Policy Team provides evidence, research, and recommendations to guide enforcement actions.

The Outreach & Communications Team manages stakeholder engagement, media, and community relations.

Administrative & IT Support Team ensures smooth operational and technical support.

## **Executive Order Integration and Authority Justification**

### **IV. Executive Order and Established Authority**

1. Attached as Exhibit A Docket Filing of Case 1:24 cv 00479 RC, to this motion is the Executive Order and Declaration of Historical Record issued by Rev. Dr. Christina Clement, establishing the framework for self-determined leadership and civil rights enforcement within the redlining jurisdictions. This Executive Order and Declaration of Historical Record articulates the mandate, organizational structure, and operational protocols necessary to address systemic civil rights violations effectively.

2. This Executive Order and Declaration of Historical Record reflects a duly considered and formalized declaration of authority consistent with existing legal principles governing public benefit entities and tribal or self-determined governance frameworks. It embodies a proactive commitment to remedy documented harms and enforce civil rights protections where current mechanisms have failed or remain insufficient.

3. The Executive Order and Declaration of Historical Record's provisions aligned with the relief sought herein and complement the court's authority to appoint a Lead Civil Rights Officer to oversee enforcement efforts within the impacted jurisdictions. Granting this motion will allow immediate activation of the Executive Order and Declaration of Historical Record's directives, ensuring prompt and accountable enforcement action.

4. Incorporating the Executive Order and Declaration of Historical Record within this motion demonstrates readiness for operational leadership, including a fully staffed team, budget, and enforcement plan, as detailed herein. The Executive Order and Declaration of Historical Record provides the structural foundation required for sustained progress and accountability, mitigating risks of delay or noncompliance.

5. Given the urgency and severity of ongoing civil rights violations, as documented in prior filings and supported by current data, the court's endorsement of this Executive Order and Declaration of Historical Record through granting this motion is both appropriate and necessary to protect vulnerable communities.

#### **Legal Basis Reinforcement:**

**Pursuant to 42 U.S.C. § 1983, 28 U.S.C. § 1651, and Federal Rule of Civil Procedure 53, this Court holds broad equitable powers to ensure the enforcement of civil rights protections, including the appointment of officers or agents to oversee compliance, monitor constitutional violations, and effectuate just remedies. Where applicable, this authority is reinforced by Title VI of the Civil Rights Act (42 U.S.C. § 2000d) and the D.C. Human Rights Act (D.C. Code § 2-1401.01 et seq.). This motion respectfully invokes that authority.**

#### **Qualifications Reminder:**

The attached curriculum vitae and expert testimonials (Exhibit B) unequivocally establish Rev. Dr. Clement's qualifications and experience as uniquely suited for this leadership role, fulfilling the standard of competence and commitment this court requires.

#### **Urgency & Impact Statement:**

Delays in appointment exacerbates documented harms, prolonging systemic injustices that the court has recognized in prior proceedings. Immediate approval will advance equitable remedies and fulfill the court's mandate to uphold constitutional and statutory rights.

### **VII. PRAYER FOR RELIEF**

**WHEREFORE, Similar frameworks have been approved in:**

- **Tuskegee Syphilis Settlement Trust**
- **BP Deepwater Horizon Fund**
- **United States v. Mitchell (Tribal Trust oversight)**
- **Grant such further relief as the Court may deem necessary.**

**Plaintiff respectfully prays that this Honorable Court:**

- 1. Reopen Case No. 1:24-cv-00479-RC to grant in favor of this Consent Decree.**
- 2. Appoint Rev. Dr. Christina Clement as Lead Civil Rights Officer with nationwide authority.**
- 3. Close all enforcement loopholes hindering compliance.**
- 4. Approve the proposed salary and support team budget as detailed.**
- 5. Order full cooperation from all relevant agencies.**
- 6. Take judicial notice of the newly filed Executive Financial Order and associated exhibits.;**
- 7. This decree expressly acknowledges the State of Loc Nation Supreme Court as the self-determined legal body with judicial authority over all matters of trust enforcement, reconciliation protocol, and redress policy under this agreement.;**
- 8. This Court acknowledges the judicial authority of the Supreme Court of the State of Loc Nation to supervise the implementation of this civil rights reconciliation process, consistent with the terms of the Consent Decree, treaty law, and trust governance principles.;**
- 9. Grant court order to compel agencies to cooperate with the printing and distribution of LND (ISO4217 compliant, swift preregistered and LEI compliant) as relief to areas affected by redlining i.e. Crane currency, Visa partner, Brinks transportation, etc.**
- 10. Grant Court order for the cooperation and coordination among relevant federal agencies, including but not limited to the Department of Justice and the U.S. Department of the Treasury, to facilitate lawful implementation and distribution of the Loc Nation Dollar (LND) as a form of relief consistent with fiduciary law, treaty obligations, and economic equity policy.**
- 11. Enter such other and further relief as this Court deems just and proper.**

**Attached and on Public record in Case 25 MC 78**

**State of Loc Nation Supreme Court Executive financial Order**

**Legal Notice Affidavit**

**LD2 Lobbying Disclosure Report: Judicial Warrant**

**ISO 4217 license**

**Sent and Received Receipts to US Treasury with Settlement Offer**

**Diplomatic Petition**

**Brinks Transportation Authorization**

**Printer Authorization**

**Declaration for the Historical Record**

**NOTICE OF CONSTRUCTIVE AGREEMENT BY SILENCE (Doctrine of Tacit Acquiescence) and all other evidence in DC case 25 mc 78**

**GSCCCA efile 1 EF\_012152679\_0002059963\_044 Received Tuesday October 22, 2024 9:38:20 PM Page 1 of 13 Notice of Assignment**

**Settlement offers of IRS, NAVY Federal, Utility Companies, US treasury, Student loan debt relief, City Hall budget and employee match, etc.**

**[PROPOSED] ORDER ON MOTION TO REOPEN CASE AND ENTER CONSENT DECREE**

**Upon consideration of Plaintiff Rev. Dr. Christina Clement's Motion to Reopen Case Pursuant to Federal Rule of Civil Procedure 60(b) for Continuing Harm, New Material Evidence, and Related Judicial Acts, and to Enter Consent Decree for Civil Rights Enforcement and Trust-Based Reconciliation, and the supporting exhibits, filings, and record before the Court,**

**IT IS HEREBY ORDERED THAT:**

- 1. The Motion to Reopen Case No. 1:24-cv-00479-RC is GRANTED pursuant to Fed. R. Civ. P. 60(b)(2) and (6).**
- 2. The Court acknowledges the existence and legal standing of the State of Loc Nation Global Public Benefit Corporation and State of Loc Nation Global Public Benefit Trust, Black USA and its SOLN Supreme Court, as relevant entities under the Public Trust and treaty framework presented.**
- 3. The Court ENTERS A CONSENT DECREE to facilitate equitable enforcement of civil rights and systemic restitution in redlined jurisdictions.**
- 4. Rev. Dr. Christina Clement is hereby RECOGNIZED as the National Civil Rights Enforcement Coordinator under the Consent Decree, with authority to convene a 12-member national enforcement and reconciliation team, administering public trust reconciliation processes, and report through the Public Trust Ledger.**

5. The Court orders cooperation and coordination among all relevant federal agencies, including but not limited to the Department of Justice and the U.S. Department of the Treasury and Bureau of Printing and Engraving, Navi, IMF, World Bank to facilitate lawful implementation and distribution of the Loc Nation Dollar (LND) as a form of relief consistent with fiduciary law, treaty obligations, and economic equity policy as well as the protective rights established (ECF DC 124cv00479RC.)
6. The Court formally recognizes the judicial authority of the Supreme Court of the State of Loc Nation to supervise and administer the terms of this Consent Decree in accordance with the principles of trust law, treaty governance, and reconciliation frameworks, as presented.
7. The Court retains temporary jurisdiction for enforcement and oversight of this Consent Decree, including but not limited to resolving disputes, monitoring agency compliance, and facilitating further implementation orders as necessary until relief is satisfied.
8. A status conference shall be scheduled within 30 days to assess compliance and next steps in the Consent Decree's execution.

**SO, ORDERED.**

**Dated:** \_\_\_\_\_, 2025

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**RUDOLPH CONTRERAS**  
United States District Judge

**Certified "URGENT: Rule 60(b) Consent Decree Motion – Civil Action No. 1:24-cv-00479-RC."**

Respectfully submitted,

Thank you for your attention to this matter.



**"SELF DETERMINED**

Rev. Dr. Christina Clement, Presidential Candidate of the US 2024, PRO SE

President of Black USA

President of STATE OF LOC Nation Global Public Benefit Corporation

Trustee of STATE OF LOC NATION GLOBALPUBLIC BENEFIT TRUST

JUDGE of SOLN SUPREME COURT

8 The Green, Suite 22023

Dover, DE 19901

678-780-5557

Rule 5 (c) Signing. A filing made through a person's electronic –filing account and authorized by that person, together with that person's name on a signature block, constitutes the person's signature.

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 08, 2025, I electronically emailed the foregoing with the Clerk of the Court using the email address [dcd\\_cmecf@dcd.uscourts.gov](mailto:dcd_cmecf@dcd.uscourts.gov) and [dcd\\_intake@dcd.uscourts.gov](mailto:dcd_intake@dcd.uscourts.gov), which clerk will send notice to all parties.

Lobbying reports completed, legal notice, judicial warrant and all have resulted in Tacit Acquiescence. All legal and lawful proof of service have been met. Cc sent to Chief Investigator, The Judicial Qualifications Commission Jonathan McFarland to assure compliance.

“CHRISTINA CLEMENT