

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

CHRISTINA CLEMENT and
HH EMPRESS QUEEN CHRISTINA LOCS IS OUR ARTIFACT OF FAITH

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

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff CHRISTINA CLEMENT and HH EMPRESS QUEEN CHRISTINA LOCS IS OUR ARTIFACT OF FAITH respectfully moves this Court for summary judgment in her favor on all claims in the above-captioned matter. In support of this motion, Plaintiff states as follows:

INTRODUCTION

Plaintiff Rev. Dr. Christina Clement seeks declaratory and injunctive relief against Defendants 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 capacities, on the grounds that Defendants' actions have violated Plaintiff's constitutional rights and federal law as detailed in the submitted complaint logged with the District Court Clerk on February 13, 2024.

RECEIVED

MAY 30 2024

Clerk, U.S. District & Bankruptcy
Court for the District of Columbia

The material facts are undisputed and conclusively foreclose any argument to the contrary, entitling Plaintiff to judgment as a matter of law.

LEGAL STANDARD

Under Rule 56 of the Federal Rules of Civil Procedure, summary judgment is appropriate when "there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." Fed. R. Civ. P. 56(a). The moving party bears the initial burden of demonstrating the absence of a genuine issue of material fact. *Celotex Corp. v. Catrett*, 477 U.S. 317, 323 (1986). Once the moving party meets this burden, the nonmoving party must set forth specific facts showing that there is a genuine issue for trial. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 250 (1986).

ARGUMENT

I. There is No Genuine Dispute as to Any Material Fact by the Defendants/Respondents

The material facts in this case are not in dispute and conclusively foreclose any genuine issue for trial. The parties agree on the essential facts regarding the issues in this case. Plaintiff has submitted all relevant documents, including over 100 admissible victim statements, which were filed through dcd_cmecf@dcd.uscourts.gov and dcd_intake@dcd.uscourts.gov on May 27, 2024, at 8:43 AM and followed up on May 29, 2024, at 4:19 PM. As such, this case is ripe for summary judgment.

II. Plaintiff is Entitled to Judgment as a Matter of Law

Plaintiff has demonstrated that Defendants' failure to respond, see affidavit of mailing logged with District Court of Columbia clerks on April 30, 2024 file #4 and address the remedies of restitution from the complaint submitted to the District Court of Columbia clerks on February 13, 2024, after exhausting all administrative efforts, constitutes grounds for summary judgment and all relief requested in the complaint, including the appointment of Rev. Dr. Christina Clement as

President of the United States, amending the constitution with favorable laws for the Afro and Indigenous communities, and acknowledgment of the State of Loc Nation.

1. Violation of Constitutional Rights: The undisputed facts conclusively establish that Defendants' actions violated Plaintiff's rights as evidenced by the statutes presented in the complaint logged on February 13, 2024.
2. Violation of Federal Law: The undisputed facts also conclusively show that Defendants' conduct breaches the federal statutes, facts, and legal precedents mentioned in the complaint logged on February 13, 2024.

CONCLUSION

The undisputed facts conclusively foreclose any argument to the contrary, demonstrating that Plaintiff Rev. Dr. Christina Clement is entitled to judgment as a matter of law. For the foregoing reasons, Plaintiff respectfully requests that this Court grant her Motion for Summary Judgment, declare that Defendants' actions are in violation of various federal statutes, facts, and legal precedents mentioned in the complaint logged on February 13, 2024, and grant the requested injunctive relief.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff prays that this Court:

1. Grant summary judgment in favor of Plaintiff on all claims;
2. Declare that Defendants' actions violated federal statutes, facts, and legal precedents mentioned in the complaint logged on February 13, 2024;
3. Issue a permanent injunction against Defendants, prohibiting the challenged actions;
4. Appoint Christina Clement as President of the United States of America;
5. Legally acknowledge the State of Loc Nation;

6. Award Plaintiff her costs and fees; and
7. Grant such other and further relief as the Court deems just and proper.

Since there is no protection for the majority against minority tyranny, Plaintiff moves to submit the below proposal for the Admissions Act of the State of Loc Nation, inducing the 440 electors and appointing Rev. Dr. Christina Clement as President of the United States of America, along with the prayer for relief of restitution requested in Volume 1-3 of "Revealed the Kingdom of Locs Nazirite Vow Continues." Volume 3 is the claim submitted in this case, Volume 2 is the Amicus Curiae, and Volume 1 was submitted to the United Nations in 2023.

I am writing to formally propose the recognition and establishment of the State of Loc Nation, a sovereign entity representing all Indigenous and Afro-descendant individuals within the United States and globally. This request is rooted in a desire to create a governance structure that acknowledges and addresses the unique historical and contemporary challenges faced by our communities.

Legal Basis and Precedents

The United Nations has recognized the distinct identities and rights of Afro-descendant communities through the International Decade for People of African Descent (2015-2024), emphasizing the need for recognition, justice, and development. Furthermore, various nations have implemented legal frameworks to support the rights and autonomy of Afro-descendant communities:

- Brazil's 1988 Constitution: Recognizes the rights of Quilombola communities, granting them collective land ownership and cultural preservation.
- Colombia's Law 70 of 1993: Acknowledges the rights of Afro-Colombians to their collective territories and cultural heritage.
- Ecuador's 2008 Constitution: Ensures the rights of Afro-Ecuadorians to maintain their cultural identity, traditions, and land.

- Canada's Emancipation Day: Recognized federally since 2021, Emancipation Day marks the abolition of slavery in the British Empire, acknowledging the contributions and history of Afro-Canadians.
- United Kingdom's Race Relations Act 1965 and Subsequent Amendments: These laws were among the first to address racial discrimination, setting a legal framework that acknowledged the rights and protections needed for Afro-descendants and other racial minorities.
- Costa Rica's Constitutional Reforms: In 2015, Costa Rica amended its constitution to officially recognize the Afro-Costa Rican population and their cultural contributions.
- Peru's Law No. 28761: Enacted in 2006, this law declares June 4th as the Day of Afro-Peruvian Culture, recognizing the contributions of Afro-Peruvians to the nation's history and culture.
- Mexico's Constitutional Amendment: In 2019, Mexico amended its constitution to recognize Afro-Mexicans as a distinct ethnic group, granting them greater visibility and protection under the law.
- Uruguay's Law No. 19122: Enacted in 2013, this law promotes the inclusion of Afro-Uruguayans in the workforce and mandates affirmative action measures to address historical disadvantages.
- Dominican Republic's Recognition of Afro-Dominican Identity: Efforts to address and acknowledge the Afro-Dominican population have been ongoing, including cultural recognition and anti-discrimination measures.
- Argentina's National Institute Against Discrimination, Xenophobia, and Racism (INADI): This institute works to promote equal rights and combat discrimination, including that faced by Afro-Argentines.
- Venezuela's Law Against Racial Discrimination (2011): This law specifically aims to prevent and punish racial discrimination, with provisions to protect the rights of Afro-Venezuelans.
- Bolivia's Constitutional Recognition: Bolivia's 2009 Constitution acknowledges Afro-Bolivians as a distinct group with rights to their cultural identity and collective territories.

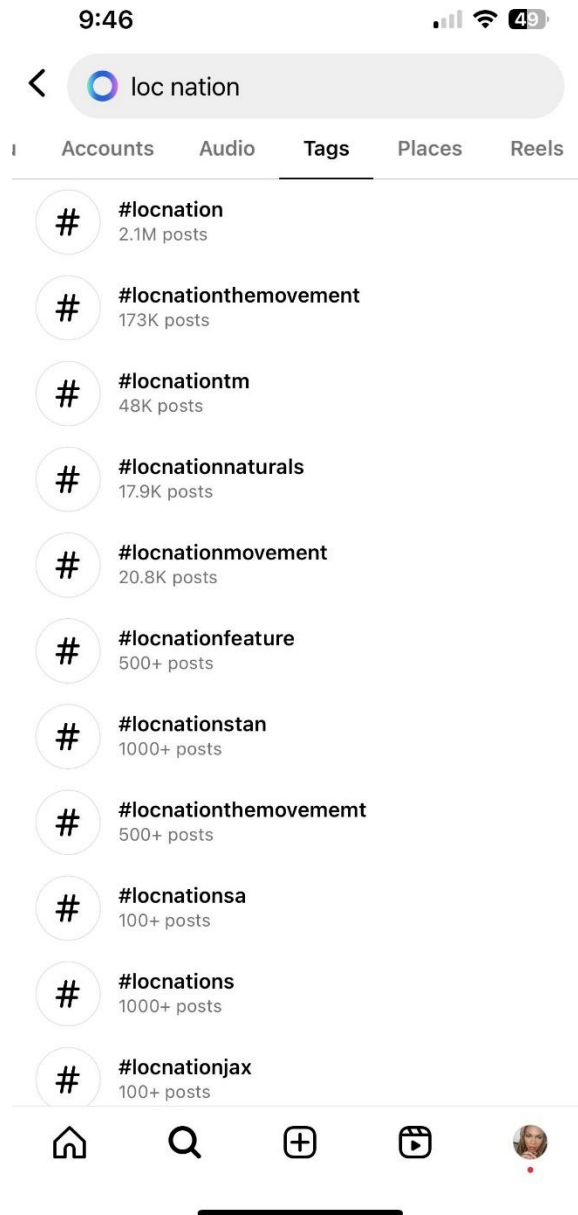
Proposal for the State of Loc Nation

The State of Loc Nation seeks to operate as a sovereign entity of United States, providing governance and advocacy for Indigenous and Afro-descendant communities. This state would focus on the following objectives:

1. Cultural Preservation: Protect and promote the cultural heritage, languages, and traditions of Indigenous and Afro-descendant communities.
2. Economic Development: Implement programs to address economic disparities and promote sustainable development within these communities.
3. Education and Health: Ensure access to quality education and healthcare, tailored to the specific needs of our communities.
4. Political Representation: Provide a platform for political representation and participation at local, state, and national levels.
5. Legal and Social Justice: Advocate for the rights and protections of Indigenous and Afro-descendant individuals, addressing systemic discrimination and historical injustices.

Admissions Act

In addition to the legal precedents and support outlined above, we propose the enactment of an Admissions Act that formally recognizes the establishment of the State of Loc Nation and its representation of Indigenous and Afro-descendant individuals of the United States see submitted Defacto De Jure logged with the District Court of Columbia on May 19, 2024 File #12 Att:1 Exhibit



Thank you for your attention to this matter. Should the Court require any further information or documentation, please do not hesitate to contact me.

Respectfully submitted,

Thank you for your attention to this matter.



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

8 The Green, Suite A

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 May 30, 2024, I electronically emailed the foregoing with the Clerk of the Court using the email address dcd_cmecf@dcd.uscourts.gov and dcd_intake@dcd.uscourts.gov, which clerk will send notice to all parties.

CHRISTINA CLEMENT

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Admissible Testimonials of State of Loc Nation Citizens

Victim Impact Statements

Cc: Office of Victim and Survivor Rights and Services

One of the rights guaranteed under the Sixth Amendment to the United States Constitution is the right of a suspect to confront witnesses against him or her.

The Crime Victims' Rights Act (CVRA), 18 U.S.C. § 3771, is part of the United States Justice for All Act of 2004, Pub. L. No. 108-405, 118 Stat. 2260 (effective Oct. 30, 2004).

- The right to full and timely restitution as provided in law.
- The right to proceedings free from unreasonable delay.

Based on the evidence presented regarding Captain Willie Lynch Story and Colonel Charles Lynch law, it's evident that generational damage has resulted from broken homes, domestic violence, unbalanced opportunities in education, unfair targeting by authorities, and systemic oppressions.

Injustice

1. Martin Luther King Jr. once wrote, "Injustice anywhere is a threat to justice everywhere. We are caught in an inescapable network of mutuality, tied in a single garment of destiny. Whatever affects one directly, affects all indirectly." (Letter from Birmingham Jail, 1963).
2. Nelson Mandela famously said, "I have cherished the ideal of a democratic and free society in which all persons live together in harmony and with equal opportunities. It is an ideal which I hope to live for and to achieve. But if needs be, it is an ideal for which I am prepared to die." (Rivonia Trial Speech, 1964).
3. Harriet Tubman's words resonate: "I had reasoned this out in my mind; there was one of two things I had a right to, liberty or death; if I could not have one, I would have the other; for no man should take me alive; I should fight for my liberty as long as my strength lasted, and when the time came for me to go, the Lord would let them take me." (Interview with Sarah Bradford, 1865).

Children of Generational Kidnapping During the Illegal Transatlantic Slave Trade

1. Frederick Douglass boldly stated, "I appear before you this evening as a thief and a robber. I stole this head, these limbs, this body from my master and ran off with them." (Speech at the American Anti-Slavery Society, 1848).
2. Olaudah Equiano vividly described the horrors of slavery: "The shrieks of the women, and the groans of the dying, rendered the whole a scene of horror almost inconceivable." (The Interesting Narrative of the Life of Olaudah Equiano, 1789).
3. Sojourner Truth's powerful words echo through time: "I have borne thirteen children, and seen most all sold off to slavery, and when I cried out with my mother's grief, none but Jesus heard me! And ain't I a woman?" (Ain't I a Woman? Speech, 1851).

Racism

1. James Baldwin's poignant reflection encapsulates the Black experience: "To be a Negro in this country and to be relatively conscious is to be in a rage almost all the time." (Notes of a Native Son, 1955).
2. Malcolm X asserted the rights of African Americans: "We declare our right on this earth...to be a human being, to be respected as a human being, to be given the rights of a human being in this society, on this earth, in this day, which we intend to bring into existence by any means necessary." (Speech at the Founding Rally of the Organization of Afro-American Unity, 1964).
3. Rosa Parks expressed her desire for freedom: "I would like to be remembered as a person who wanted to be free... so other people would also be free." (Interview with Rosa Parks, 1995).

Identifying current victims of injustice, slavery, and racism can be complex due to the ongoing and evolving nature of these issues. However, here are some examples of groups and individuals who have been identified as victims in recent times:

Injustice

1. Uyghur Muslims in China: The Uyghur ethnic minority in the Xinjiang region of China faces mass internment, forced labor, and other severe human rights abuses. The Chinese government has been accused of committing cultural genocide against the Uyghurs.
2. Rohingya Muslims in Myanmar: The Rohingya people have faced brutal military crackdowns, leading to widespread displacement, with many fleeing to Bangladesh and other countries. The United Nations has described the actions against them as a textbook example of ethnic cleansing.

Children of Generational Kidnapping During the Illegal Transatlantic Slave Trade

1. Modern-Day Slavery in Various Countries: Human Trafficking Victims, particularly women and children, are trafficked globally for purposes of forced labor, sexual exploitation, and other forms of modern-day slavery. Countries like India, Bangladesh, and Nigeria have high incidences of human trafficking.
2. Qatar's Migrant Workers: Migrant workers in Qatar, many from South Asia, have faced exploitative labor conditions while working on infrastructure projects, including those related to the FIFA World Cup. Reports include cases of passport confiscation, non-payment of wages, and unsafe working conditions.

Racism

1. African Americans in the United States: African Americans continue to face systemic racism in various aspects of life, including criminal justice, employment, housing, and healthcare. The Black Lives Matter movement has highlighted ongoing police brutality and racial disparities in the justice system.
2. Indigenous Peoples in Various Countries: Indigenous communities worldwide, including in the United States, Canada, Australia, and Brazil, face ongoing discrimination, land dispossession, and marginalization. They often suffer from poorer health outcomes, lower educational attainment, and higher rates of poverty compared to non-Indigenous populations.
3. Romani People in Europe: The Romani people, also known as Roma, face widespread discrimination and social exclusion across Europe. They often live in segregated communities and have limited access to education, employment, and healthcare.

Story Corp A nonprofit organization that collects and shares stories from diverse communities: Search the collection of conversations from nearly 700,000 participants, the largest single collection of human voices ever gathered.

“We Knew We Were the Best.” Reflections from the First Black Marines of Montford Point - StoryCorps

Link: [StoryCorps - Black Marines] (<https://storycorps.org/stories/we-knew-we-were-the-best-reflections-from-the-first-black-marines-of-montford-point/>)

Link: [StoryCorps - Racism Stories] (<https://storycorps.org/stories/?s=racism>) (84 stories on this link)

Documentaries on Racism

1. "13th" (2016) - Directed by Ava DuVernay, this documentary examines the intersection of race, justice, and mass incarceration in the United States.
2. "I Am Not Your Negro" (2016) - Directed by Raoul Peck, this documentary is based on James Baldwin's unfinished manuscript "Remember This House." It explores the history of racism in the United States through Baldwin's reminiscences of civil rights leaders Medgar Evers, Malcolm X, and Martin Luther King Jr.
3. "The Central Park Five" (2012) - Directed by Ken Burns, Sarah Burns, and David McMahon, this film tells the story of five Black and Latino teenagers who were wrongfully convicted of raping a white woman in Central Park in 1989. It highlights issues of racial profiling and
4. "Get Out" (2017) - Directed by Jordan Peele, this horror film uses suspense and satire to address issues of racism and exploitation experienced by African Americans.
5. "The Color Purple" (1985) - Directed by Steven Spielberg and based on the novel by Alice Walker, this film depicts the life and struggles of an African American woman in the early 20th-century South.
6. "Mississippi Burning" (1988) - Directed by Alan Parker, this film is based on the true story of the FBI investigation into the murders of three civil rights workers in Mississippi in 1964.
7. "American History X" (1998) - Directed by Tony Kaye, this film examines the life of a former neo-Nazi who tries to prevent his younger brother from following the same path of racism and violence.
8. "The Help" (2011) - Directed by Tate Taylor, this film explores the lives of African American maids working in white households in Jackson, Mississippi, during the Civil Rights Movement.

9. "To Kill a Mockingbird" (1962) - Directed by Robert Mulligan and based on Harper Lee's novel, this film tells the story of a lawyer in the Depression-era South who defends a Black man falsely accused of raping a white woman.

10. "Fruitvale Station" (2013) - Directed by Ryan Coogler, this film is based on the true story of Oscar Grant, a young Black man who was shot by a police officer at the Fruitvale BART Station in Oakland, California.

Rev Dr. Christina Clement's Personal Story

Rev Dr. Christina Clement's personal journey epitomizes the enduring struggle against systemic oppression. Married high school sweetheart which lead to broken home marred by abusive relationships, she experienced firsthand the consequences of societal neglect and racial discrimination. Despite her resilience, Rev Dr. Clement faced numerous obstacles, from inadequate educational opportunities to the prevalence of crime and violence in her neighborhood.

Her name, Christina, was chosen by her mother as a means of circumventing racial bias and discrimination in employment. This poignant decision reflects the pervasive nature of racism and its impact on individuals' opportunities and livelihoods. Even in the face of adversity, Rev Dr. Clement persevered, advocating for justice and equality in her community.

Legal Context: Motion of Default Judgment

The time frame for a Motion of Default Judgment to be signed and recognized varies depending on the specific circumstances of the case and applicable legal procedures. However, the delay in addressing such motions can serve as further evidence of systemic oppression within the legal system. Despite the clear merits of the case and the rights afforded to victims under the law, bureaucratic hurdles and institutional biases may impede the timely resolution of legal proceedings, perpetuating the cycle of injustice.

By amplifying the voices of individuals like Rev Dr. Christina Clement and acknowledging the systemic barriers they face, we affirm our commitment to combating racial discrimination and ensuring equal access to justice for all.

There are thousands of victim statements through poetry, court records, song, movies, etc.

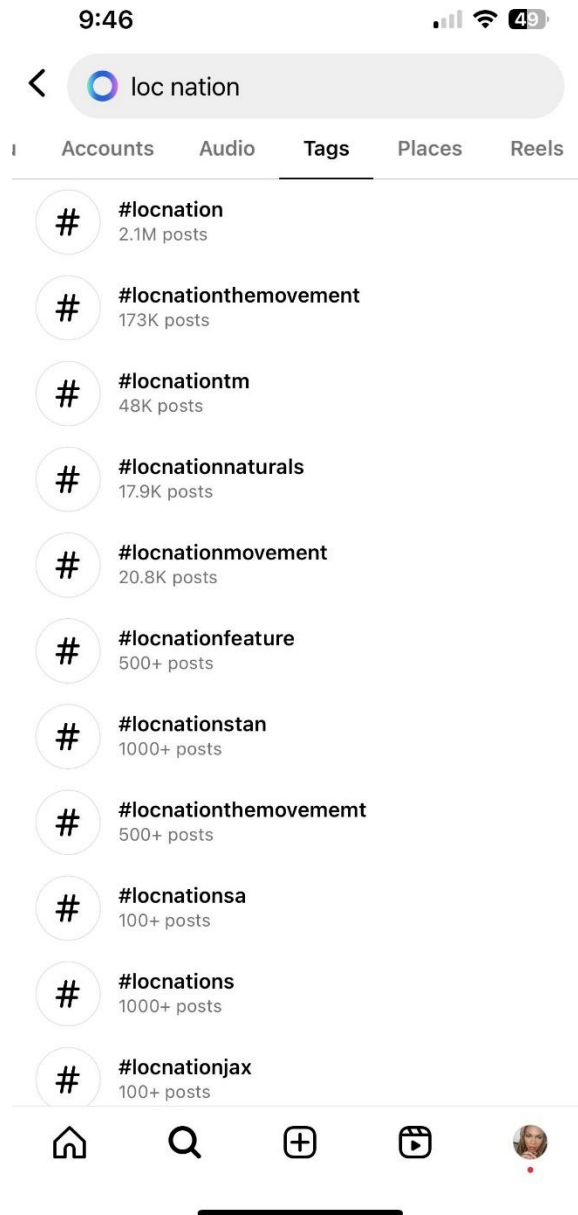
The pervasive impact of historical injustices continues to haunt our present and jeopardize the future of generations to come. From the enduring legacy of systemic racism to the devastating effects of substance abuse, such as the introduction of fentanyl to our youth, the toll on our society is immeasurable.

Considering these challenges, it is imperative to embark on a path of comprehensive restitution and repair. The proposed remedies outlined in both Volume 2 - International Territory and Volume 3 - National Territory of Revealed the Kingdom of Locs Nazirite Vow continues, targeting a population of 1.4 trillion and 4.2 million respectively, are vital steps toward addressing the deep-rooted wounds inflicted upon our communities.

Central to this endeavor is the recognition of the State of Loc Nation as a sovereign state country, entrusted with the governance of over 440 electors. Under this framework, the administration, led by President Rev Dr. Christina Clement, is poised to enact transformative change that aligns with the aspirations and needs of its citizens.

Crucially, this transformative agenda necessitates a comprehensive overhaul of our existing constitutional framework. By adapting our laws and institutions to better serve the interests of the people of Loc Nation, we can lay the foundation for a more just, equitable, and prosperous society.

As we embark on this journey of healing and renewal, let us remain steadfast in our commitment to justice, equality, and the well-being of all members of our community. Together, we can build a brighter future for Loc Nation and pave the way for a more inclusive and harmonious world.



Thank you for your attention to this matter. Should the Court require any further information or documentation, please do not hesitate to contact me.

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