# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA Court of Appeals

# 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 USCA CASE NUMBER 24-5263

Cc: The Honorable Attorney General's U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530

Subject: Motion for Injunctive Relief to Facilitate Leadership Transition and Budget Allocation for Civil Rights Operations

Dear Judge (s) and Attorney General(s)

I respectfully file this motion for injunctive relief in my capacity as President of Black USA, committed to advancing civil rights, equity, and justice for historically marginalized communities across the nation. This request seeks judicial and administrative support to:

## 1. Assume Leadership Over all Civil Rights Divisions:

I request an injunction to facilitate my appointment and operational leadership over the relevant civil rights divisions, including the Department of Justice Civil Rights Division, ensuring strategic alignment to combat systemic inequalities.

## 2. Transfer and Allocate Budgets for Operations:

I seek an order directing the transfer or allocation of funding and budgets essential for

implementing critical civil rights initiatives, ensuring that resources are utilized to address disparities effectively.

3. Ensure Coordination Across Agencies:

This motion seeks to mandate collaboration among federal, state, and local agencies, under the oversight of the Attorney General, to ensure a seamless transition of leadership and alignment of efforts.

#### Legal Basis for Injunctive Relief

The requested relief aligns with the principles of equity and justice enshrined in the Constitution and civil rights statutes. It is imperative to:

- Prevent delays in addressing systemic inequities.
- Safeguard the public interest in robust civil rights enforcement.
- Ensure continuity and efficiency in resource allocation.

This motion is brought under the inherent authority of this Court to ensure the effective implementation of civil rights protections and the uninterrupted operation of relevant divisions.

#### **Immediate Steps Requested**

- 1. **Judicial Oversight and Directive**: Issue an order facilitating my immediate contact with leadership within the civil rights divisions and associated budgetary offices to lead all departments and initiatives.
- 2. **Budget Review and Allocation**: Direct a comprehensive review and reassignment of funds to support the operational mandate of Black USA in leading all civil rights initiatives.
- 3. **Establish Milestones**: Mandate clear timelines for transition and funding implementation, ensuring accountability and measurable outcomes.

In the District of Columbia, several legal principles and statutory provisions could potentially support the act outlined in your injunction motion. Below is a summary of relevant laws and doctrines:

#### 1. D.C. Code Title 2 - Government Administration

• **D.C. Code § 2-1402.11** (Prohibition of Discrimination): This provision under the D.C. Human Rights Act prohibits discrimination and supports equity and inclusion efforts. It provides a basis for civil rights advocacy and operational initiatives to address systemic inequalities.

#### 2. D.C. Code Title 16 - Judiciary and Judicial Procedure

- **D.C. Code § 16-1901 et seq.** (Injunctions): These provisions govern the granting of injunctive relief in D.C. courts. To obtain an injunction, you must demonstrate:
  - 1. Likelihood of success on the merits.
  - 2. Irreparable harm in the absence of relief.
  - 3. That the balance of equities favors your position.
  - 4. The injunction is in the public interest.

Delays in leadership and budget allocation would irreparably harm civil rights enforcement and the public good.

#### 3. D.C. Code Title 38 - Education

• **D.C. Code § 38-2601**: This provision establishes the oversight authority of various educational initiatives in D.C., supporting collaboration between agencies to address systemic disparities in access to education, which aligns with our broader civil rights objectives.

#### 4. U.S. Constitution - 14th Amendment

• The Equal Protection Clause guarantees equal protection under the law, providing a foundational principle for the enforcement of civil rights initiatives.

#### 5. Title VI of the Civil Rights Act of 1964

• Prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. This law supports arguments for proper budget allocation to advance civil rights goals.

#### 6. Judicial Authority

• Inherent Power of Courts: Courts have inherent authority to issue equitable relief, including injunctions, to address ongoing violations of constitutional rights or statutory duties.

### 7. Coordination with the Executive and Legislative Branches

• As the President of Black USA and co-trustee of a public benefit corporation, I argue that my role aligns with the D.C. Code provisions for public-private collaborations to promote equity and access to essential resources.

Thank you for your attention to this urgent matter. I trust the Court and the Attorney General will act to uphold the principles of justice and equity that underpin this nation. Please contact me directly at 678-780-5557 or info@stateoflocnation.com to discuss further.

Disclosures: List any additional documents you are including, such as organizational charters, budget proposals, or relevant correspondence that will assist me with this initiative.. Thank you

Prayer for relief on all other terms remain

Prof. Rev Dr Christina Clement additional Inaugural Address for January 27, 2025:

My fellow Americans,

Today, we stand at a defining moment in our nation's history, united in our shared pursuit of liberty, justice, and equity for all. As I take this solemn oath, I am humbled by the trust you have placed in me to lead our great nation. This moment is not mine alone; it belongs to every individual who has ever dreamed of a fairer, more inclusive America.

Together, we embark on a journey of renewal and transformation—one where the voices of the underserved will be amplified, the rights of all citizens protected, and the promise of America fulfilled for every community. From urban centers to rural towns, our strength lies in our unity, diversity, and resilience.

In the coming years, my administration will focus on rebuilding the pillars of our democracy. We will ensure access to quality education, expand economic opportunities, and reform systems that have perpetuated inequities for too long. We will invest in our youth, our environment, and our shared future. Together, we will rise.

On February 3, in a private ceremony of oil anointing with horn, I will reaffirm my commitment to serve with humility, integrity, and an unwavering faith in the boundless potential of our people. This sacred moment will ground my leadership in the values we hold dear: hope, courage, and compassion.

Let us move forward, not as divided factions, but as one united nation. Together, we will write the next chapter of our shared story—one of progress, justice, and enduring hope.

May God bless you all, and may God bless the United States of America.

.With gratitude and respect,

Thank you for your attention to this matter.

"Prof Rev.Dr. Christina Clement, President, of Black USA Co-Trustee, State of Loc Nation Global Public Benefit Corporation 8 The Green, Suite 21215

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 January 27, 2024, I uploaded the foregoing to the Clerk of the Court using the e-filing court system address 333 Constitution Ave, NW Washington DC 20001, which clerk will send notice to all parties.

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#### THE OFFICE OF STATE OF LOC NATION GLOBAL PUBLIC BENEFIT CORP

8 The Green Suite 21215 Dover, DE 19901 info@stateoflocnation.com

## Inaugural Address of the 1st Black President of Black USA and America

**Rev Dr Christina Loren Clement** 

Jan 20, 2025

My fellow Americans and global family,

Today, we stand at the crossroads of history. We stand together as one people, yet shaped by the many paths we've traveled, and the countless lives that have brought us here. I am humbled and honored to take the oath of office today, not just as your President, but as a reflection of the dreams, struggles, and triumphs of so many who have come before me. I stand before you as a Black American, a Jamaican, an Aboriginal, an Indigenous person-and ultimately, as a descendant of all people of copper-colored descent. GODs Child. My identity is a tapestry woven from the history of my ancestors—ancestors who were stolen, oppressed, and systematically exploited. I am the product of generations who endured the brutality of illegal human farming and who persevered through centuries of struggle. Their resilience lives in me, in all of us. From the shores of Africa, to the islands of the Caribbean, to the original lands of this continent, our people have always been a part of the fabric of this nation, even when that nation refused to recognize our humanity. We were forced to build, to fight, and to survive under the most inhumane conditions. But our spirits could not be broken. This day is not just about me. It is about the millions of Black, Indigenous, and marginalized people whose stories have long been ignored. It is about the generations of struggle, the ones who fought not only for survival, but for dignity, for recognition, and for equality. I stand here because of them. This moment is their victory, too. But let us not forget that the work is not finished. The chains of the past may have

been broken, but the scars remain. Systemic injustice, economic disparity, and racial discrimination still plague our communities. Too many of our people still face the struggle for basic rights-the right to a fair wage, the right to quality education, the right to safety in our own neighborhoods. These battles are not over, and they will not be forgotten. As your President, I pledge to you that I will lead with understanding, humility, and an unwavering commitment to justice. I will honor the sacrifices made by my ancestors by fighting for a future where every single American, regardless of their ethnicity, background, or place of origin, has the chance to thrive. We cannot rest while so many of our brothers and sisters are still denied that opportunity. I am not here to divide us. I am here to unite us. We must recognize that our strength lies in our diversity-in the richness of our different cultures, languages, and experiences. We must honor the dignity of every person, regardless of their ethnic heritage or the color of their skin. The wounds of the past must be healed, and the promises of the future must be secured for all. Let us work toward a nation where every child, no matter their ethnicity, walks into a classroom knowing they have the same opportunities as anyone else. Let us build a society where the descendants of the enslaved, the Indigenous, the immigrant, and the marginalized can walk through life with the full recognition of their worth, their humanity, and their rights. This is a nation built on ideals of liberty, freedom, and justice for all-but those ideals have not yet been fully realized. The Constitution of the United States promises equality, but it is up to us, all of us, to make that promise real. We must not rest until justice flows like a river, and righteousness like a mighty stream, for every person of every background, of every color, of every creed. So today, as I take the oath of office, I do not do so alone. I do so as a representative of the struggles and triumphs of all people, from all walks of life, from all corners of this great nation. Together, we will rise, not just as one nation, but as one people—people of every shade, every culture, every ethnic heritage-working side by side for the common good. Let us embrace the work ahead, knowing that though the road may be long, the victory is certain. And may we walk this path with love, with unity, with courage, and with the unshakeable belief that we are stronger together. May God bless you all, may God bless this great country, and may we all strive to honor the full legacy of the people who came before us by building a future where all are truly

free.

Thank you. I love you

"Rev. Dr. Christina Clement, President of Black USA and America January 20, 2025

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