

Pro Se 1 (Rev. 09/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Leonitus Jabir Bey

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Commonwealth of Massachusetts, et al

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

19CV10219

(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Leonitus J Bey

Street Address

Lowell Mass [01854]

City and County

Suit 1934

State and Zip Code

Telephone Number

617-480-9025

E-mail Address

ryamexum@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Leonitus Jabir Bey [*Pro Se*]  
Po Box, Suite 1934, Lowell Massachusetts [01894]

*Plaintiff*

v.

THE COMMONWEALTH OF MASSACHUSETTS, THE CITY OF LOWELL, William Samaras, Raymond Kelly Richardson, Charles Duane Baker Jr., Stacey J. Fortes, David Allen Pender, Peter J. Koutoujian, et alia

*Defendants*

William Samaras  
Mayor of the Municipal City of Lowell.  
Lowell City Hall. 375 Merrimack Street, Lowell, MA 01852.

Raymond Kelly Richardson  
Superintendent of Lowell Municipal Police.  
Lowell City Hall. 375 Merrimack Street, Lowell, MA 01852.

Charles Duane Baker Jr.  
Massachusetts State House, 24 Beacon St., Office of the Governor, Room 280, Boston, MA 02133.

Stacey J. Fortes  
District Court Judge for Lowell District Court. 41 Hurd St, Lowell, MA 01852.

David Allen Pender  
Municipal Police.  
Lowell City Hall. 375 Merrimack Street, Lowell, MA 01852.

Peter J. Koutoujian  
Middlesex Sheriff.  
400 Mystic Ave, 4th Floor, Medford, MA 02155.

Pro Se 1 (Rev. 09/16) Complaint for a Civil Case

---

---

**Defendant No. 1**

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

---

---

---

---

---

---

---

---

**Defendant No. 2**

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

---

---

---

---

---

---

---

---

**Defendant No. 3**

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

---

---

---

---

---

---

---

---

**Defendant No. 4**

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

---

---

---

---

---

---

---

---

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

*Treaty of Peace and Friendship of 1786-1787, 28 USC 1332, 18 USC 241, 18 USC 242, Article III and Art VI of the constitution, 18 USC 1091(a)(4), 18 USC 1028, 18 USC 1584, 18 USC 1621*

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Leonitus J Bey, is a citizen of the State of (name) Morocco.

b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_ . Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

its \$9 million per, Genocide, Purjury, deprevation of rights under color, Conspiracy against right, Fraud, defamation of charecter, Intimedation, domestic terrorism.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Due to the fact that Agents of the Municipal City of Lowell and the Commonwealth of Massachusetts have violated the State and Federal Constitution, which they are bound thereby, this Tort claim is being filed against them. The municipal agent of the Lowell police department i.e. David Allen Pender, was to contact his immediate supervisor or the Superintendent of the Lowell Police department i.e. Raymond Kelly Richardson, once notified that I am a Moroccan citizen and not a citizen of Lowell or Massachusetts. Raymond Kelly Richardson was then to notify the Mayor of Lowell, William Samaras, who was then to notify State officials, i.e. Charles Duane Baker Jr.

The State Officials, pursuant to 28 USC § 1332 (a)(1)(2), were to immediately inform the Federal Government of the issue of diversity and that they were in contact with a national foreign to their jurisdiction. The federal Government according to Article VI of the Constitution and Article 20 and 21 of Treaty of Peace and Friendship of 1786-1787, were to contact the Moorish American Consulate immediately, in order for the State and City to avoid exercising jurisdiction they do not have e.g. Personam Jurisdiction.

The Federal Government of the United States Corporation (28 USC § 3002 (15)(a)) was properly placed on notice of the Moorish American Consulates existence on 6/9/2018 : see; <https://storage.googleapis.com/wzukusers/user-32092105/documents/5bc6b274e81d9XuLZmVh/Notice%20of%20Moorish%20American%20Consulate%20and%20Orders.pdf>, thus all States, Departments, Government Agencies of the United States and the individual States and the like are liable in a Tort claim.

- . Unlawfully arrested at my place of domicile.
- . Repeatedly hit in the face by policy enforcer PENDER ALLEN, DAVID.
- . Threaten with a deadly weapon on first sight by said David Pender over a civil infraction.
- . Denationalized being called outside of my race, culture, and nationality by being labeled as "Black".
- . Placed in bondage and taken to an unknown facility where I was offered a \$40 ransom for the release of my body.
- . Treated as and labeled as a criminal over a civil infraction.
- . Processed through a State level court system with no due process of law.
- . Dehumanized, and placed in inhumane conditions.
- . Repeated attempts to force an identity on me in order for the state level courts to fraudulently gain Personam Jurisdiction over me.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

Signature of Plaintiff

*Leonitus Jabari Bey*

Printed Name of Plaintiff

*Leonitus J Bey*

B. For ~~Attorneys~~ *Consul*

Date of signing: \_\_\_\_\_

Signature of ~~Attorney~~ *Consul*

*Jamhal Talib Abdullah Bey*

Printed Name of ~~Attorney~~ *Consul*

*Jamhal Talib Abdullah Bey*

~~Bar Number~~

~~Name of Law Firm~~

*Moorish American Consulate*

Street Address

*23 Acorn St, 3rd Fl*

State and Zip Code

*Providence RI 02908*

Telephone Number

*401-403-8176*

E-mail Address