

No. 25-1184

ORIGINAL

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OFFICE OF THE CLERK
SUPREME COURT, U.S.

IN THE SUPREME COURT OF THE UNITED STATES

ANGELA W. DEBOSE,

Petitioner,

v.

FLORIDA POLYTECHNIC UNIVERSITY
BOARD OF TRUSTEES,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO
THE SUPREME COURT OF FLORIDA

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Whether the State of Florida violates the Due Process and Equal Protection Clauses of the Fourteenth Amendment by imposing a prohibitive \$1,000,000.00 security bond as a condition for a pro se litigant to maintain a civil action, thereby creating an insurmountable financial barrier to court access. *See Boddie v. Connecticut*, 401 U.S. 371 (1971).
2. Whether a state appellate system violates the Fourteenth Amendment when it utilizes unelaborated decisions to insulate potentially void lower court orders from meaningful judicial review, effectively creating a jurisdictional void for litigants. *See Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1982).

**PARTIES TO THE PROCEEDING
AND RELATED CASES**

Parties: Angela W. DeBose, Petitioner; and
Florida Polytechnic University Board of Trustees
The following proceedings are directly related to this
case within the meaning of Rule 14.1(b)(iii):

Supreme Court of Florida

Case Name: Angela W. DeBose v. Florida
Polytechnic University Board of Trustees

Docket Number: SC2026-0072

Date of Entry of Judgment: **January 15, 2026**

Florida Sixth District Court of Appeal

Case Name: Angela DeBose v. Florida
Polytechnic University Board of Trustees

Docket Number: 6D2025-1163

Date of Entry of Judgment: **December 19,
2025** (Order denying Motion to Recall
Mandate)

Tenth Judicial Circuit Court, Polk County

Case Name: Angela DeBose v. Florida
Polytechnic University Board of Trustees

Docket Number: 2024-CA-003555

Date of Entry of Judgment: **October 23,
2025** (Final Dismissal with Prejudice)
and **April 30, 2025** (Vexatious Litigant/Bond
Order)

TABLE OF CONTENTS

QUESTION PRESENTED	i
PARTIES TO THE PROCEEDING	ii
TABLE OF AUTHORITIES	iv
OPINIONS BELOW	1
JURISDICTION	1
CONSTITUTIONAL PROVISIONS INVOLVED	2
STATEMENT OF THE CASE	2
REASONS FOR GRANTING THE PETITION	2
CONCLUSION	3
APPENDIX	4

INDEX TO APPENDICES

APPENDIX A: Order of the Supreme Court of Florida (Jan. 15, 2026).....	1a
APPENDIX B: Order of the Sixth District Court of Appeal (Dec. 19, 2025).....	3a
APPENDIX C: Final Dismissal Order of the Trial Court (Oct. 23, 2025).....	5a
APPENDIX D: Vexatious Litigant and Bond Order (Apr. 30, 2025).....	8a

TABLE OF AUTHORITIES

Cases:

<i>Boddie v. Connecticut</i> , 401 U.S. 371 (1971).....	i, 2
<i>Lindsey v. Normet</i> , 405 U.S. 56 (1972).....	2
<i>Logan v. Zimmerman Brush Co.</i> , 455 U.S. 422 (1982).....	i, 3
<i>Mullane v. Central Hanover Bank & Trust Co.</i> , 339 U.S. 306 (1950).....	2
<i>Wheeler v. State</i> , 296 So. 3d 895 (Fla. 2020).....	1

Constitutional Provisions:

U.S. Const. amend. XIV, § 1 (Due Process Clause).....	2
U.S. Const. amend. XIV, § 1 (Equal Protection Clause)....	2

Statutes and Rules:

28 U.S.C. § 1257(a).....	1
§ 68.093, Fla. Stat. (Florida Vexatious Litigant Law).....	1
Fla. R. App. P. 9.130(f).....	2

OPINIONS BELOW

The order of the Supreme Court of Florida (Case No. SC2026-0072) dismissing the petition for lack of jurisdiction is provided in Appendix A. The underlying order of the Sixth District Court of Appeal (Case No. 6D2025-1163) denying the motion to recall the mandate and issuing a caution is provided in Appendix B.

JURISDICTION

The Supreme Court of Florida entered its final order dismissing the petition for lack of jurisdiction on January 15, 2026 (App. A). The Court explicitly stated that no motion for rehearing or reinstatement would be entertained. This petition for a writ of certiorari is timely filed on or before April 15, 2026, which is within 90 days of the entry of that judgment pursuant to Supreme Court Rule 13.1. The jurisdiction of this Court is invoked under 28 U.S.C. § 1257(a).

CONSTITUTIONAL PROVISIONS INVOLVED

U.S. Const. amend. XIV, § 1 provides in pertinent part: "No State shall... deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

STATEMENT OF THE CASE

Petitioner filed a civil action in the Tenth Judicial Circuit of Florida. On April 30, 2025, the trial court declared Petitioner a "vexatious litigant" under § 68.093, Fla. Stat., and ordered a \$1,000,000.00 security bond. Petitioner timely appealed this order. While the

appeal was pending in the Sixth District Court of Appeal, the trial court entered a Final Dismissal with Prejudice on October 23, 2025, because the bond was not posted.

The Sixth District Court of Appeal issued an unelaborated order denying relief on December 19, 2025, and cautioned Petitioner against further filings. The Florida Supreme Court dismissed the petition for review for lack of jurisdiction on January 15, 2026, citing the "unelaborated decision" rule from *Wheeler v. State*.

REASONS FOR GRANTING THE PETITION

I. The \$1,000,000.00 Bond Violates the Fundamental Right of Access to Courts.

Under *Boddie v. Connecticut*, 401 U.S. 371 (1971), a state may not "precondition" access to the judicial process upon the payment of a fee that an individual is unable to pay. This Court further clarified in *Lindsey v. Normet*, 405 U.S. 56 (1972), that while a state may impose reasonable procedural requirements, it may not create arbitrary financial barriers—such as double-bond requirements—that effectively bar non-frivolous appeals by those unable to pay. A \$1,000,000.00 bond is an insurmountable financial barrier that is not "closely tailored" to a legitimate state interest but instead functions as a total deprivation of the "meaningful opportunity to be heard" required by *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306 (1950).

II. The Florida Appellate Process Created a Jurisdictional Void.

By dismissing the case while an appeal was pending—and by the Florida Supreme Court's refusal to review that dismissal because it was "unelaborated"—the State of Florida has denied Petitioner any forum to challenge a potentially void order. This procedural limbo violates federal Due Process. *See Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1982).

CONCLUSION

The State of Florida has conditioned Petitioner's access to the courts upon an insurmountable financial barrier and then insulated that barrier from judicial review through the use of unelaborated decisions. This process has created a jurisdictional void that leaves Petitioner without a forum to challenge a potentially void order, in direct violation of the Due Process and Equal Protection Clauses of the Fourteenth Amendment.

For the foregoing reasons, this Court should grant the petition for a writ of certiorari.

Respectfully submitted,

s/ **Angela W. DeBose**

Petitioner, Pro Se

March 20, 2026

