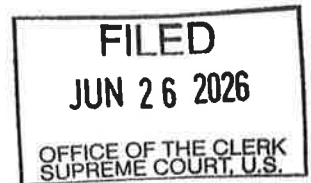


No. 25-1184



**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 United
States Court of Appeals for the Eleventh Circuit**

PETITION FOR REHEARING

**ANGELA W. DEBOSE
Petitioner pro se (Counsel of Record)
1107 West Kirby Street
Tampa, FL 33604
Ph: (813) 230-3023
Email: awdebose@aol.com**

TABLE OF CONTENTS

Section Title	Page Number
GROUND FOR REHEARING	1
1. Express Jurisdictional Limitation to Hillsborough County	1
2. Unauthorized Out-of-Circuit Data Deployment by Polk County	1
3. Compounded Error via Judge Ojeda's Non-Compliant Order	2
4. Reliance on a Proven Falsified Record	2
CONCLUSION	3
CERTIFICATE OF COUNSEL (RULE 44.2)	4
APPENDIX INDEX	5

TABLE OF AUTHORITIES

Category / Cited Authority	Page Reference(s)
Constitutional Provisions	
U.S. Const. amend. XIV (Due Process Clause)	1, 2
U.S. Const. art. VI, cl. 2 (Supremacy Clause)	2, 3
Federal Court Mandates & Decisions	
<i>Angela W. DeBose v. Florida Polytechnic University Board of Trustees</i> , U.S. Court of Appeals for the Eleventh Circuit, Mandate No. 25-10872	1, 2, 3
<i>Angela W. DeBose v. Florida Polytechnic University Board of Trustees</i> , U.S. District Court for the Middle District of Florida, Case No. 8:15-cv-02787	1, 4

State Court Orders

In re: DeBose,
Thirteenth Judicial
Circuit Court for
Hillsborough
County, Florida
(Judge Melissa M.
Polo Injunction
Order)

2, 3

In re: DeBose, Tenth
Judicial Circuit
Court for Polk
County, Florida
(Judge Reinaldo
Ojeda
Administrative
Denial Order)

2, 3

Supreme Court Rules

Supreme Court Rule
29 (Service)

5

Supreme Court Rule
33.1 (Booklet
Format Guidelines)

5

Supreme Court Rule
44.2 (Grounds for
Certiorari
Rehearing)

1, 4, 5

PETITION FOR REHEARING

Pursuant to Supreme Court Rule 44.2, Petitioner Angela W. DeBose respectfully submits this Petition for Rehearing of the Court's June 8, 2026, order denying her Petition for a Writ of Certiorari. This amendment is critically required to expose a severe, irreconcilable jurisdictional conflict within the state court record that has completely contaminated the federal appellate process.

Intervening Jurisdictional Flaws and Grounds for Rehearing

1. Express Jurisdictional Limitation to Hillsborough County

On January 9, 2026, Circuit Court Judge Melissa M. Polo entered a prefiling sanction order in the Thirteenth Judicial Circuit for Hillsborough County, Florida.

Judge Polo's order explicitly limits its own geographic and operational scope, enjoining the pro se filings of related nonparties strictly in the Thirteenth Judicial Circuit of Hillsborough County, Florida. **(App. 8)**

Crucially, Judge Polo's operative order possesses zero legal authority or application within Polk County, Florida. **(App. 8)**

2. Unauthorized Out-of-Circuit Data Deployment by Polk County

Despite the absolute jurisdictional boundaries set by the issuing judge, the Tenth Judicial Circuit Court for Polk County, Florida, completely hijacked the Hillsborough County order. **(App. 10)**

Without notice, without an evidentiary hearing, and without independent statutory compliance, Polk County weaponized Judge Polo's localized order to manufacture a brand-new, unauthorized statewide "Vexatious Litigant" profile under Petitioner's name on April 30, 2025. **(App. 1, 10)**

This illicit data migration caused the Florida Supreme Court Clerk to publish a defective, overbroad administrative listing that falsely purports to cover Hardee, Highlands, and Polk Counties. **(App. 1)**

3. Compounded Error via Judge Ojeda's Non-Compliant Order

This breakdown was further cemented on June 17, 2026, when Polk County Judge Reinaldo Ojeda stubbornly denied Petitioner's emergency motion to vacate this structural nullity. **(App. 11)**

By denying relief with prejudice, the Polk County tribunal has completely insulated a fraudulent clerical record that actively misleads federal case analysts. **(App. 11)**

This administrative chaos stands in direct defiance of Eleventh Circuit Mandate No. 25-10872, which explicitly restricted past filing sanctions to a narrow, individual employment dispute. **(App. 16)**

4. Reliance on a Proven Falsified Record

The state court order forces this Court to rely on a compromised record. **(App. 11)** As demonstrated by forensic database logs and certified lower-court backend audit logs, the volumetric history used to label Petitioner as vexatious was technically manufactured

via electronic docket replication and backend manipulation. Because the state judiciary refuses to correct its own fraudulent metadata, this Court must intervene to ensure its appellate reviews are not distorted by a corrupted out-of-state record.

Conclusion

The state court record is structurally broken. A Hillsborough County injunction has been unlawfully exported by a Polk County tribunal to create an unauthorized statewide barrier. **(App. 1, 8)** Because this deceptive, cross-jurisdictional clerical error directly triggered the June 8, 2026, denial of certiorari, this Court must grant rehearing to preserve the integrity of its own appellate review.

Dated: June 22, 2026

Respectfully submitted,



/s/ Angela W. DeBose

Petitioner pro se (Counsel of Record)

1107 West Kirby Street

Tampa, FL 33604

Ph: (813) 230-3023

Email: awdebose@aol.com

CERTIFICATE OF COUNSEL (RULE 44.2)

I hereby certify that this Petition for Rehearing is presented in good faith and not for delay, and is strictly limited to demonstrating how an unconstitutional jurisdictional conflict between state circuits has corrupted the federal record.

Dated: June 22, 2026



/s/ **Angela W. DeBose**

Petitioner pro se (Counsel of Record)

APPENDIX

EXHIBIT A: Florida Supreme Court Master Registry Profile Printout (**App. 1**)

EXHIBIT B: Hillsborough County Circuit Court Injunction Order (Judge Melissa M. Polo) (**App. 2**)

EXHIBIT C: Polk County Circuit Court Order Denying Emergency Motion to Vacate (Judge Reinaldo Ojeda) (**App. 10**)

EXHIBIT D: United States Court of Appeals for the Eleventh Circuit Mandate (**App. 12**)

EXHIBIT E: United States District Court Final Jury Verdict Sheet (**App. 18**)

EXHIBIT A
FLORIDA SUPREME COURT VEXATIOUS
LITIGANTS LIST ENTRY
UPDATED JUNE 12, 2026

NAME: DEBOSE, Angela
DATE OF ENTRY: 4/30/2025
CIRCUIT: 10
COUNTY: Hardee

NAME: DEBOSE, Angela
DATE OF ENTRY: 4/30/2025
CIRCUIT: 10
COUNTY: Highlands

NAME: DEBOSE, Angela
DATE OF ENTRY: 4/30/2025
CIRCUIT: 10
COUNTY: Polk

*(Source: Florida Supreme Court Clerk Case
Management Database, Vexatious Litigants Registry)*

EXHIBIT B
IN THE THIRTEENTH JUDICIAL CIRCUIT FOR
THE STATE OF FLORIDA GENERAL CIVIL
DIVISION

ANGELA DEBOSE,

Petitioner,

CASE NOS.: 15-CA-5663,
17-CA-1652, 19-CA-4473

DIVISION: C
USF BOARD OF TRUSTEES,

Respondent.

ORDER FINDING NONPARTIES LAVONNE
WASHINGTON AND MICHAEL WASHINGTON
TO BE VEXATIOUS LITIGANTS AND IMPOSING
SANCTIONS AND DIRECTIONS TO CLERK

THIS MATTER is before the Court on its own motion in accordance with sections 68.093(4), and 68.093(2)(c)2,3, Florida Statutes (2025), also known as Florida's Vexatious Litigant Law. The Court has conducted an extensive review of the record and makes the following findings of fact and conclusions of law.

FACTUAL BACKGROUND

On January 6, 2026, this Court rejected an unsolicited and unauthorized proposed order submitted through the e-portal by attempted intervenors Lavonne Washington and Michael Washington ("the Washingtons") that related to an equally unauthorized

Motion to Vacate the Washingtons filed only one day before on January 5, 2026 (Doc. 545). In rejecting the unauthorized proposed order, which purported to grant relief previously denied by this Court, the Court advised the Washingtons that their submission of the proposed order was in direct violation of this Court's previous orders (Docs. 490, 493) denying their requests to intervene in this long-closed matter and advising them that future filings would not be acted on.

The Washingtons were further advised that the documents would be removed from the file in accordance with the Court's previous order (Doc. 493), which directed the Clerk to place in a separate administrative file any future filing related to the three cases captioned herein filed by either or both of the Washingtons. Finally, the Washingtons were warned that any future filing would be met with the Court invoking the remedies available to it under the Vexatious Litigant Law. § 68.093, Fla. Stat. The Court notes that the Washingtons' stated basis to intervene is to challenge this Court's July 25, 2022 Injunctive Sanctions Order (Doc. 433) entered against their sibling, Petitioner Angela Debose, for her abuses of the judicial process, a matter that has been finally determined for over two-and-a-half years.

On September 12, 2024, Petitioner Debose received an order from the Florida Supreme Court denying her most recent attempt for relief from this Court's Injunctive Sanctions Order (Docs. 483, 433 respectively). Thereafter, on February 9, 2025, the Washingtons filed their Motion to Intervene and Reopen Case to Correct Administrative Error (Doc. 484). The motion was denied with prejudice February 10, 2025 (Doc. 487).

The Washingtons then filed, on February 12, 2025, a motion requesting the Court to vacate its February 10th order (Docs. 485, 487). Before the Court could rule on the motion (Doc. 485), the Washingtons filed another motion (Doc. 486) on February 12, 2025, demanding that the presiding judge recuse herself and (again) to vacate the order denying the Washingtons' Motion to Intervene. The motions were denied in their entirety (Doc. 488).

Thereafter, on February 14, the Washingtons filed self-styled "Directions to the Clerk" (Doc. 489), demanding that the Clerk "perform its ministerial duty to add Intervenor (the Washingtons) to cases 17-CA-1652 and 19-CA-4473...". These "Directions" were stricken (Doc. 493). In addition, the order striking (the Washingtons') directions directed the Clerk to place any future filings in a separate administrative file and to close 15-CA-5663, 17-CA-1652, and 19-CA-4473.

The following day, February 18, the Washingtons appealed this Court's Order to the Second District Court of Appeal (Doc. 528). The appeal case no. is 2D2025-0400 and remains pending. Despite the pending appeal, the Washingtons continue to file papers in this case in apparent attempts to interfere with the appellate court's jurisdiction and in violation of this Court's orders (Doc. 536 (Motion to Dissolve Injunction filed June 25, 2025), Doc. 542 (Motion to Vacate filed Nov. 24, 2025), and Doc. 545 (Motion to Vacate filed Jan. 5, 2026)).

LEGAL STANDARD

Effective July 1, 2025, section 68.093, Florida Statutes, or "Florida's Vexatious Litigant Law," was substantially revised to provide courts with greater flexibility in addressing vexatious litigation. The

Washingtons are not parties to the underlying litigation. The statute, however, defines a “vexatious litigant” as “a person,” not necessarily a party. See § 68.093(1)(c), Fla. Stat. The amended statute introduces three additional, alternative grounds for designating a litigant as vexatious. See §§ 68.093(2)(c)(2) – (4), Fla. Stat. (2025). Notably, in contrast to the previous version of the statute, these new methods now authorize a court to deem a litigant vexatious based on conduct in a single case. See *id.* Applicable to this case, section 68.093(2)(c)(2), (3) consider a litigant vexatious if:

(2) “After an action has been finally and adversely determined against the person, (they) repeatedly relitigate or attempt to relitigate either the validity of the determination against the same party as to whom the action was finally determined or the cause of action, claim, controversy, or any of the issues of fact or law determined by the final and adverse determination against the same party as to whom the action was finally determined.” § 68.093(2)(c)(2), Fla. Stat. (2025);

(3) “Repeatedly files pleadings, requests for relief, or other documents that have been the subject of previous rulings by the court in the same action.”

An action is not considered “finally and adversely” determined if an appeal is pending. § 68.093(2)(c), Fla. Stat. (2025). Although the Court acknowledges that the Washingtons’ formal status as intervenors as determined by this Court has not formally been fully and finally determined, this Court concludes that the point is immaterial for several reasons. The Washingtons’ first attempt to intervene was already determined to be unauthorized in a related appeal.

Moreover, their attempt to intervene in this case is directed at challenging a matter (the injunctive sanctions order) that, along with their prior attempts to intervene, have already been fully and finally determined. (See Docs. 471, 472, 475, 476, 541, and 544).

In short, the outcome of the pending appeal is dispositive of the issues the Washingtons are currently attempting to relitigate and which form the basis of this order. The Court does not believe that the pending appeal is an impediment to its consideration of those issues. If anything, it illustrates the lengths the Washingtons will go to continue their unrelenting campaign of baseless litigation.

Once a litigant has qualified as vexatious, the Court may enter a prefiling order that prohibits the litigant from commencing, pro se, any new action in the courts of that circuit without first obtaining leave of Court. § 68.093(4), Fla. Stat. (2025). As amended, the statute provides that leave may be granted by the court generally, rather than requiring oversight by an administrative judge. Leave will be granted only where the litigant shows that the proposed action is meritorious and not being filed for the purpose of delay or harassment. See also, *Smith v. Fisher*, 965 So.2d 205, 208 (Fla. 4th DCA 2007) (finding that section 68.093 satisfies the Kluger “no alternative method of correcting the problem” test and therefore, is a permissible restriction on a person’s access to the courts). In granting leave to file a new action, the court can require the litigant to furnish security. §68.093(3)(b), Fla. Stat. Failure to comply with the court’s order may be punished as contempt of court. § 68.093(4), Fla. Stat. The relief provided in section 68.093 is cumulative to any other available relief. § 68.093(8), Fla. Stat. (2025).

DISCUSSION

This Court will not expend unnecessary resources recounting the myriad abuses of court resources Ms. Debose and the Washingtons have expended in their ongoing campaign to relitigate issues that have already been adjudicated. This Court's July 25, 2022 Injunctive Sanctions Order (Doc. 433) recites in detail Ms. Debose's conduct up to the entry of that order, and the facts set forth herein recite most of the conduct that occurred thereafter. In particular, the Court notes the Washingtons' attempts to circumvent court orders expressly directed to them by filing notices directing the Clerk to perform what they characterize as a "ministerial duty" of designating them as legitimate intervenors in this matter and their contemptuous attempt to obtain the Court's signature on a proposed order in contravention of this Court's previous orders, established court procedures, and the appellate court's jurisdiction.

Although the civil rules of procedure provide that anyone claiming interest in pending litigation may be permitted to assert a right by intervention, the rule plainly requires court permission, and the necessity of an order makes clear that the designation of the Washingtons as intervenors is anything but a ministerial act, and certainly not one to be carried out unilaterally by the Clerk. See Florida Rule of Civil Procedure 1.230 (requiring court permission to intervene). See also, *Dortch v. Alachua Cnty. Sch. Bd.*, 330 So. 3d 976, 979 (Fla. 1st DCA 2021, citing, *Solomon v. Sanitarians' Registration Bd.*, 155 So. 2d 353, 356 (Fla. 1963) ("a ministerial duty is one that does not involve the exercise of discretion.")). And, in the event it escaped anyone's notice, this case is not now, and has

not been for some time, in “pending” status, thus precluding intervention by anyone.

It is therefore ORDERED and ADJUDGED as follows:

1. Pursuant to Fla. Stat. § 68.093(4), this Court enters this prefiling order classifying LAVONNE WASHINGTON and MICHAEL WASHINGTON as vexatious litigants and prohibiting them from commencing, pro se, any new action in the Thirteenth Judicial Circuit of Hillsborough County, Florida, without first obtaining leave of Court.
2. Nothing in this Order prohibits an attorney in good standing with The Florida Bar from filing an action on behalf of the Washingtons. See § 68.093(4), Fla. Stat.
3. If LAVONNE WASHINGTON AND MICHAEL WASHINGTON, individually or collectively, as self-represented litigants, seek to file a new civil action, each must file a motion with the Clerk of this Court titled “Vexatious Litigant’s Motion for Permission to File a New Civil Action” and include a copy of this Order.
4. The Clerk shall forward the motion, along with the proposed complaint and this Order, to any Judge of the Thirteenth Judicial Circuit. The assigned judicial officer may condition the filing of the proposed action on the furnishing of security as defined in § 68.093(2)(b), Fla. Stat. § 68.093(4), Fla. Stat.
5. The Clerk of the Thirteenth Judicial Circuit of Florida shall provide a copy of this prefiling order to the Clerk of the Florida Supreme Court, for inclusion on the registry of vexatious litigants.
6. Further filings in this case by the Washingtons in violation of this and previous orders of this Court in the absence of a court order allowing such filing will be subject to the imposition of sanctions, up to and

including prosecution for indirect criminal contempt, the punishment for which may include the imposition of fines and incarceration.

7. The Clerk will continue to place any future filing related to case nos. 15-CA-5663, 17-CA-1652, and 19-CA-4473 filed by either Lavonne Washington, Michael Washington, or both, in a separate administrative file.
8. The Clerk is directed to place a copy of this Order in 15-CA-5663, 17-CA-1652, and 19-CA-4473.

DONE AND ORDERED in Hillsborough County,
Florida.

DATE: January 9, 2026

/s/ MELISSA M. POLO, Circuit Court Judge
Electronically Conformed 1/9/2026

EXHIBIT C
IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
IN AND FOR POLK COUNTY, FLORIDA

ANGELA W. DEBOSE,

Plaintiff,

v.

CASE NO.: 2024-CA-003555

SECTION: 07

FLORIDA POLYTECHNIC
UNIVERSITY BOARD OF
TRUSTEES,

Defendant.

ORDER ON EMERGENCY MOTION TO VACATE
VOID ORDER AND FOR REMOVAL
FROM THE MASTER REGISTRY OF
VEXATIOUS LITIGANTS

(Filing # 250662688 E-Filed 06/18/2026 11:44:53 AM)

This matter coming before the Court on Plaintiff's Emergency Motion to Vacate Void Order and for Removal from the Master Registry of Vexatious Litigants, pursuant to Florida Rule of Civil Procedure 1.540(b)(4), moving this Court to vacate the order determining her status as a vexatious litigant entered on April 30, 2025, and to order her immediate removal from the Florida Supreme Court's Master Registry of Vexatious Litigants, and the Court having considered the same:

IT IS ADJUDGED AND DECREED:

MOTION, CONSIDERED AND DENIED WITH
PREJUDICE.

THIS 17th DAY OF JUNE, 2026.

/s/ REINALDO OJEDA, JUDGE

EXHIBIT E

NOT FOR PUBLICATION

In the

**United States Court of Appeals
For the Eleventh Circuit**

No. 25-10872
Non-Argument Calendar

ANGELA W. DEBOSE,
Plaintiff,
LAVONNE WASHINGTON,
MICHAEL WASHINGTON,
Intervenor Plaintiffs-Appellants,

versus

UNITED STATES OF AMERICA,
THIRTEENTH JUDICIAL CIRCUIT,
CHIEF JUDGE, THIRTEENTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA,
ELIZABETH GADDY RICE,
individually and/or in her official capacity,
GREGORY P. HOLDER,
individually and/or in his official capacity, et
al.,
Defendants-Appellees.

Opinion of the Court

Appeal from the United States District
Court for the Middle District of Florida
D.C. Docket No. 8:21-cv-02127-SDM-
AAS

Before LUCK, LAGOA, and BLACK,
Circuit Judges.

PER CURIAM:

Appellants Michael and LaVonne Washington, proceeding pro se, appeal the district court's denial of their Rule 24(a) motion to intervene as of right. Angela DeBose, the plaintiff in this case, is subject to a filing injunction on her future filings regarding her employment at the University of South Florida without the signature of an attorney barred in Florida or the Middle District of Florida. Appellants assert they have an interest in the underlying litigation because they are beneficiaries to Patricia Washington's estate, and DeBose, the personal representative of Patricia Washington's estate, cannot

Opinion of the Court

fully protect their interest in the estate because DeBose is subject to this filing injunction. After review,¹ we dismiss this appeal.

A district court must permit intervention as of right under Rule 24(a) if an entity “(1) is given an unconditional right to intervene by federal statute; or (2) claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant’s ability to protect its interest, unless existing parties adequately represent that interest.” Fed. R. Civ. P. 24(a). We have distilled four elements that must be met to satisfy the second subsection: (1) the application to intervene must be timely; (2) there is an interest relating to the

¹ We review a district court’s denial of intervention of right under Fed. R. Civ. P. 24(a) de novo, with subsidiary factual findings subject to review for clear error. *See Salvors, Inc. v. Unidentified Wrecked & Abandoned Vessel*, 861 F.3d 1278, 1294 (11th Cir. 2017).

Opinion of the Court

property or transaction which is the subject of the action; (3) disposition of the action may impede or impair the intervenor's ability to protect that interest; and (4) that interest is represented inadequately by the existing parties to the suit. *Stone v. First Union Corp.*, 371 F.3d 1305, 1308–09 (11th Cir. 2004). The second element is met only if the interest asserted by the intervenor is “direct, substantial, and legally protectable.” *Huff v. Comm’r of IRS*, 743 F.3d 790, 796 (11th Cir. 2014) (quotation marks and alteration omitted). “[T]he intervenor must be at least a real party in interest in the transaction which is the subject of the proceeding.” *Id.* (quotation marks omitted). In deciding whether a party has a protectable interest, however, a court “must be flexible” and “focus on the particular facts and circumstances” of each case. *Id.* (quotation marks omitted).

Appellants fail to show clear error in the district court's finding that they lacked a cognizable interest in the

Opinion of the Court

property or transaction which was the subject of the action, because they do not show how their interests as estate beneficiaries are affected by DeBose's employment lawsuit even if she is the personal representative of the estate. Any judgment won or liability imposed in the underlying employment suit would only affect DeBose in her individual capacity. Furthermore, the filing injunction imposed by the district court on DeBose only applies to her employment dispute and the defendants involved in it. Accordingly, despite Appellants' contentions to the contrary, DeBose's ability to administer the estate is unaffected by the underlying case. Because the district court did not err in denying intervention as of right under these circumstances, we apply the anomalous

Opinion of the Court

rule² and **DISMISS** this appeal for want of jurisdiction.³

² Under our “anomalous rule,” we have appellate jurisdiction to determine whether a denial of intervention as of right is proper under Rule 24(a). *Davis v. Butts*, 290 F.3d 1297, 1299 (11th Cir. 2002). If we determine that the district court’s decision to deny intervention as of right was correct, our “jurisdiction evaporates and we must dismiss the appeal for want of jurisdiction.” *Id.* (quotation marks omitted).

³ Appellants’ motion to supplement the record and take judicial notice is **DENIED**.

EXHIBIT E

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

ANGELA W. DEBOSE,

Plaintiff,

v. Case No.: 8:15-cv-2787-EAK-AEP

UNIVERSITY OF SOUTH FLORIDA
BOARD OF TRUSTEES,

Defendant.

_____ /

COURT'S VERDICT FORM

Please carefully read the questions below and provide your answers in the spaces provided:

I. Race Discrimination

Do you find from a preponderance of the evidence:

(1) That the University of South Florida discharged Ms. DeBose from employment?

Answer Yes or No: **Yes**

(If your answer to this question is "No, " this ends your deliberations as to Ms. DeBose's race discrimination claim, and you should skip to question II(1). If your answer to this question is "Yes, " go to the next question.)

(2) That Ms. DeBose's race was a motivating factor that prompted the University of South Florida to take that action?

Answer Yes or No: **Yes**

(If your answer to this question is "No, " this ends your deliberations as to Ms. DeBose's race discrimination claim, and you should skip to question II(1). If your answer to this question is "Yes, " go to the next question.)

(3) That the University of South Florida would have discharged Ms. DeBose from employment even if the University of South Florida had not taken Ms. DeBose's race into account?

Answer Yes or No: **Yes**

(If your answer to this question is "Yes, " this ends your deliberations as to Ms. DeBose's race discrimination claim, and you should skip to question II(1). If your answer to this question is "No, " go to the next question.)

(4) That Ms. DeBose should be awarded damages to compensate for a net loss of wages and benefits to the date of your verdict?

Answer Yes or No: *(Blank)*

If your answer is "Yes," in what amount? \$ *(Blank)*

II. Retaliation

Do you find from a preponderance of the evidence:

(1) That Ms. DeBose engaged in protected activity?

Answer Yes or No: **Yes**

(If your answer to this question is "No, " this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer to this question is "Yes, " go to the next question.)

(2) That the University of South Florida took an adverse employment action against Ms. DeBose?

Answer Yes or No: **Yes**

(If your answer to this question is "No, " this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer to this question is "Yes, " go to the next question.)

(3) That the University of South Florida took the adverse employment action because of Ms. DeBose's protected activity?

Answer Yes or No: **Yes**

(If your answer to this question is "No, " this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer to this question is "Yes, " go to the next question.)

(4) That Ms. DeBose suffered damages because of the adverse employment action?

Answer Yes or No: **Yes**

(If your answer to this question is "No, " this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is "Yes, " go to the next question.)

(5) That Ms. DeBose should be awarded damages to compensate for a net loss of wages and benefits to the date of your verdict?

Answer Yes or No: **Yes**

If your answer is "Yes," in what amount? **\$ 310,500.00**

SO SAY WE ALL.

DATE: 9-26-18

/s/ Crystal Stephens
Foreperson's Signature

**CERTIFICATE OF SERVICE
(SUPREME COURT RULE 29)**

I, Angela W. DeBose, proceeding *pro se*, hereby certify under penalty of perjury that on this 26th day of June, 2026, a true and correct copy of the foregoing Petition for Rehearing and its accompanying Table of Appendix Exhibits was served upon the following parties in accordance with Supreme Court Rules 22 and 29:

I. Counsel for Respondent

Nicholas T. Zbrzezny, Esq.
Southern Atlantic Law Group
P.O. Box 1746
Bartow, FL 33831

*Counsel of Record for Respondent Florida Polytechnic
University Board of Trustees*

Method of Service: U.S. Mail (Priority Overnight)
and Electronic Mail (nick@southernlegal.org).

II. Filer Verification

Pursuant to Rule 29.5, three (3) copies of this amended application package have been dispatched to the Clerk of the Supreme Court of the United States via trackable overnight delivery, with an identical electronic courtesy copy transmitted to the case analysis division. All parties required to be served have been served.

Dated: June 26, 2026

/s/ **Angela W. DeBose**

Petitioner pro se (Counsel of Record)

1107 West Kirby Street, Tampa, FL 33604

Ph: (813) 230-3023

Email: awdebose@aol.com



CERTIFICATE OF WORD COUNT COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the foregoing *Petition for Rehearing* complies with the word limitation specified in Supreme Court Rule 33.1(g), as it contains exactly **472 words**, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I further certify that this document was prepared using Microsoft Word in a proportional 14-point Century Schoolbook font. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2026.

/s/ **Angela W. DeBose** 
Petitioner pro se (Counsel of Record)

1107 West Kirby Street

Tampa, FL 33604

Ph: (813) 230-3023

Email: awdebose@aol.com

**AFFIDAVIT OF TIMELY MAILING
(SUPREME COURT RULE 29.2)**

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, Angela W. DeBose, proceeding *pro se*, hereby declare under penalty of perjury that on this 26th day of June, 2026, I have placed the required forty (40) booklet copies of the *Petition for Rehearing* and one (1) unbound copy into the custody of a commercial carrier, a trackable third-party delivery service, for delivery to the following address:

**Clerk of the Supreme Court of the United States
1 First Street, NE
Washington, DC 20543**

I further declare that the delivery fees for this trackable package have been fully prepaid, and that the carrier has committed to delivering this package within 24 hours. Under Supreme Court Rule 29.2, this filing is timely as it has been dispatched to a commercial carrier on or before the established filing deadline.

Executed on June 26, 2026.

By: Angela W. DeBose

Angela W. DeBose

Petitioner pro se (Counsel of Record)

Sworn to and subscribed before me this 26th day of June, 2026.

Tatyana Williams
NOTARY PUBLIC, STATE OF FLORIDA

My Commission Expires: 11/13/26



TATYANA WILLIAMS
Notary Public
State of Florida
Comm# HH331173
Expires 11/13/2026

June 26, 2026

VIA U.S. MAIL

The Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

RE: Notice of Corrected Address and Successful Delivery (Certificate of Service)

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

Docket No.: 25-1184 – Petition for Rehearing

Dear Mr. Harris:

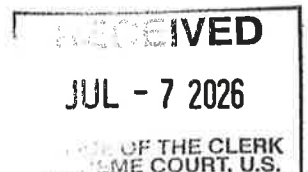
I write to respectfully inform the Court of a minor typographical error regarding the service address for opposing counsel, Nicolas T. Zbrzezni, and to confirm that the error has been successfully corrected before mailing.

On the previously filed Certificate of Service, Mr. Zbrzezni's address was inadvertently misstated with a post office box. The correct and intended address for service is:

Nicolas T. Zbrzezni
290 First Street South
Winter Haven, FL 33880

Please note that this error was intercepted and corrected directly at the United States Post Office to ensure successful, uninterrupted delivery. The mailpieces have been properly routed to the correct addresses for Nicholas Zbrzezni and Dwayne Antonio Robinson under the following United States Postal Service tracking numbers:

- **USPS Tracking No.** 9534616048696177197544
- **USPS Tracking No.** 9534616048696177197568



I respectfully request that this clarification be noted in the case file. Enclosed please find the Corrected Certificate of Service reflecting the accurate address. Thank you for your time, assistance, and continued attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Angela W. DeBose". The signature is written in a cursive, flowing style.

Angela W. DeBose

Petitioner Pro Se

1107 W. Kirby Street.

Tampa, FL 33604

**CORRECTED CERTIFICATE OF SERVICE
(SUPREME COURT RULE 29)**

I, Angela W. DeBose, proceeding *pro se*, hereby certify under penalty of perjury that on this 26th day of June, 2026, a true and correct copy of the foregoing Petition for Rehearing and its accompanying Table of Appendix Exhibits was served upon the following parties in accordance with Supreme Court Rules 22 and 29:

I. Counsels for Respondent

Nicholas T. Zbrzezni, Esq.
Southern Atlantic Law Group
290 First Street South
Winter Haven, FL 33880

Dwayne Antonio Robinson
Kozyak, Tropin & Throckmorton LLP
2525 Ponce de Leon Blvd, Floor 9
Miami, FL 33134-6039

*Counsels of Record for Respondent Florida Polytechnic
University Board of Trustees*

Method of Service: U.S. Mail (Priority Overnight)
and email.

II. Filer Verification

Pursuant to Rule 29.5, three (3) copies of this amended application package have been dispatched to the Clerk of the Supreme Court of the United States via trackable overnight delivery, with an identical electronic courtesy copy transmitted to the case analysis division. All parties required to be served have been served.

Dated: June 26, 2026

/s/ **Angela W. DeBose**



Petitioner pro se (Counsel of Record)

1107 West Kirby Street, Tampa, FL 33604

Ph: (813) 230-3023

Email: awdebose@aol.com

No. 25-1184
IN THE
SUPREME COURT OF THE UNITED STATES

ANGELA W. DeBOSE,

Petitioner,

v.

FLORIDA POLYTECHNIC UNIVERSITY BOARD OF
TRUSTEES,

Respondent.

CERTIFICATE OF COUNSEL

Pursuant to Rule 44.2 of the Rules of the Supreme Court of the United States, the undersigned hereby certifies that this Petition for Rehearing is presented in good faith and not for delay.

The undersigned further certifies that this petition is strictly restricted to the grounds specified in Rule 44.2, being limited to intervening circumstances of a substantial or controlling effect or to other grounds not previously presented.

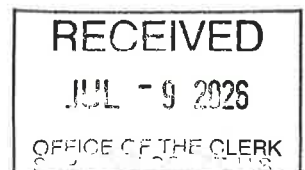
Dated: July 6, 2026

Respectfully submitted,



/s/ Angela W. DeBose

Petitioner Pro Se



No. 25-1184

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Petitioner,

v.

FLORIDA POLYTECHNIC UNIVERSITY BOARD OF
TRUSTEES,

Respondent.

PROOF OF SERVICE

I, Angela W. DeBose, hereby certify that on this 6th day of July, 2026, as required by Supreme Court Rule 29, I have served the enclosed the Certificate of Compliance (Rule 44.2) on the Respondent by depositing them in the United States mail, with first-class postage prepaid, addressed to counsel of record for the Respondent at the following address:

Nicholas T. Zbrzezny, Esq.
Southern Atlantic Law Group
290 First Street South
Winter Haven, FL 33880

Dwayne Antonio Robinson
Kozyak, Tropin & Throckmorton LLP
2525 Ponce de Leon Blvd, Floor 9
Miami, FL 33134-6039

Dated: July 6, 2026

Respectfully submitted,

/s/ Angela W. DeBose



Petitioner Pro Se
1107 West Kirby Street
Tampa, Florida 33604

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/s/ Angela W. DeBose

Petitioner Pro Se