

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Information over presents f_0 , integrations

Florida in connection and other proof of her continuous residence in Florida as a resident of Florida in connection with the Federal Bureau of Investigation

9 On or around August 1968, after C. R. ... accepted to Miami Dade College ... school officials informed her ... did not qualify for in-state tuition ... resided in Miami Dade County since ... school officials explained to C. R. ... her residency for tuition purposes ... based on her self-declared residence. Because C. R. could not provide proof of her self-declared ... presence in the ... could not qualify for in-state tuition rates ... offord non-resident tuition rates C. R. ... enrolled in college ... or ... of one day ... offord college

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and accepted to Mr. D de College were sent to study to receive a
science degree for the purpose of education and to receive a
degree of honor

upon enrolling in Mr. D de College the student is required to
submit a certificate of enrollment of the student, registration
Because of the registration of the student

The Florida Board of Governors operates regulations and is
 fully responsible for the management of Florida's entire system of public higher education. The
 Board of Governors is charged with adopting rules or policies in Florida's system of higher education.
 The Board of Governors is charged with adopting rules to determine the residency status of students for tuition
 purposes. The Chancellor of the State University System consults with the Commissioner of
 Education to establish advisory groups and the Articulation Coordinating
 Committee receives recommendations related to statewide policies on admissions
 and other matters affecting the State University System. Defendant Brown is sued
 in his official capacity.

JURISDICTION AND VENUE

This Court has jurisdiction over this action pursuant to Fla. Stat. § 44.04(3)(e), 9 N. 8 8 3, 8 3 9, 3 3, 3 9, 3 9, 3 8.

CLASS ACTION ALLEGATIONS

8 Plaintiff brings this action on behalf of herself and those similarly situated persons of the 3rd and 4th of the Federal Rules of Civil Procedure

9 The class is defined as

All persons present and future natural persons who are or will be domiciled in Florida for purposes of determining jurisdiction over Florida public institutions of higher learning for their present or future studies in the state of Florida or in any public institution

The class meets the requirements of Rule 3. Although the precise size of the class cannot be determined at this time, sufficient evidence exists that the class is so numerous that order of the merits is practical

10 Additionally, upon information of the Plaintiff, the named Plaintiff is a member of the named Plaintiff's Personal Center

Under the 4th Amendment, a person's residence is defined as a place where a person has a permanent and exclusive right of occupancy. See *United States v. Jones*, 529 U.S. 569 (2000). For more information on the definition of residence for purposes of the 4th Amendment, see [4th Amendment: Residence](#) on the Department of Justice website.

9. For purposes of the 4th Amendment, a person's residence is defined as a place where a person has a permanent and exclusive right of occupancy. See *United States v. Jones*, 529 U.S. 569 (2000). The Supreme Court has held that a person's residence is not limited to a single dwelling. See *United States v. Jones*, 529 U.S. 569 (2000). A person's residence is defined as a place where a person has a permanent and exclusive right of occupancy. See *United States v. Jones*, 529 U.S. 569 (2000). The Supreme Court has held that a person's residence is not limited to a single dwelling. See *United States v. Jones*, 529 U.S. 569 (2000).

3. An application for a search warrant need only establish the probable cause of residence, not the actual presence of the person at the residence at the time of the search. See *United States v. Jones*, 529 U.S. 569 (2000). The Supreme Court has held that a person's residence is defined as a place where a person has a permanent and exclusive right of occupancy. See *United States v. Jones*, 529 U.S. 569 (2000). The Supreme Court has held that a person's residence is not limited to a single dwelling. See *United States v. Jones*, 529 U.S. 569 (2000).

3. The Fourth Amendment requires that a search warrant be supported by probable cause. See *United States v. Jones*, 529 U.S. 569 (2000). The Supreme Court has held that a person's residence is defined as a place where a person has a permanent and exclusive right of occupancy. See *United States v. Jones*, 529 U.S. 569 (2000).



regarding non-resident non-Ford residents. The increased tuition is forced
Pinniff's only other educational or to forego, entirely

43 Pinniff's only child is enrolled in her second year at Middle College
and is classified as non-resident for tuition purposes because she could not
be present for graduation. Because of the dramatic difference in tuition
costs, her classification as a non-resident is not necessary to



49 Le Forcen A end en .o . e n.ed .es Cons.

Defendants' so-called "precision" case law, posing "ardens on" named
"es citizens" "re contrary to federal" "Defendants' policy and practice conflicts"
federal" "and see also reg" "e field of" "gr" "on" "nd citizens" "p
"Priffs see ref" "nder" "e" "ned" "es" "Cons" "on" "nd" "s" "n" "c" "on
p"rs" "n" "o" "4" "C" "9" "3" "o" "redress" "e" "depr" "on" "nder" "color of" "s" "e" "of" "ng" "s
sec"red" "y" "e" "ned" "es" "Cons" "on"

PRAYER FOR RELIEF

E EFO E "ng" "of" "e" "forego" "ng" "Priffs" "req" "es" "e" "Co" "r
Ass" "e" "nsd" "c" "on" "o" "er" "s" "er,"
Cer"fy" "s" "er" "s" "d" "ss" "c" "on" "p"rs" "n" "o" "Feder" "es" "of" "C" "Proced" "re" "3"
nd "e" "e" "d" "ss" "s" "def" "ned" "o" "e" "nd" "e" "e" "o" "s" "gned" "co" "nse"
ppo"n" "ed" "s" "d" "ss" "co" "nse",
c" "Dec" "re" "e" "c" "ll" "enged" "po" "l" "cy" "nd" "pr" "c" "t" "ice" "of"

RESPECTFULLY SUBMITTED this 9th day of October

OCEAN POE LYLA CENTER

By Mr. [redacted]
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*Application for admission *pro hac vice*
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