

UNITED STATES DISTRICT COURT

for the
Middle District of Florida



Tampa Division

BRIAN DODD

Case No. 8:20-cv-2824-T-36JSS

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

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-

saint petersburg college board of trustees ("spcbt")

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.)

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	BRIAN DODD
Street Address	7252 SPRING HILL DR
City and County	SPRING HILL
State and Zip Code	FL 34606
Telephone Number	8133799863
E-mail Address	briandodd519@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.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name	<u>saint petersburg college board of trustees ("spcbt")</u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u>6021 142nd Ave. N.</u>
City and County	<u>Largo, Pinellas</u>
State and Zip Code	<u>FL 33760</u>
Telephone Number	<u>727-341-3241</u>
E-mail Address <i>(if known)</i>	<u>president@spcollege.edu, williams.tonjua@spcollege.edu</u>

Defendant No. 2

Name	<u></u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 3

Name	<u></u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 4

Name	<u></u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

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.

Copyright Act of 1976 (17 U.S.C. §§ 101 et. seq., and all amendments thereto).

17 U.S. Code § 501 - Infringement of copyright.

Jurisdiction is proper 17 U.S.C. § 501, et seq., and 28 U.S.C. §§ 1338(a).

Venue is proper 28 U.S.C. § 1391(b) and under 28 U.S.C. § 1400(b).

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* BRIAN DODD, is a citizen of the State of *(name)* FLORIDA.

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)* st petersburg college board of trustees, is a citizen of the State of *(name)* FLORIDA. Or is a citizen of *(foreign nation)*.

b. If the defendant is a corporation

The defendant, *(name)* st petersburg college board of trustees, is incorporated under the laws of the State of *(name)* FLORIDA, and has its principal place of business in the State of *(name)* FLORIDA.
 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)*:
 \$2,000,000,000.00 for defendants' years (over a decade) of infringement and non-permitted use of Plaintiff's copyrights and copyright properties, and defendants' refusal to stop infringing Plaintiff's copyrights, and defs' ongoing and continued publishment, non-permitted use and degradation of Plaintiff's copyrights.

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.

U.S. Copyright Registrations: PA0001653082, PA0001795780. Defendant intended violations of Copyright Act of 1976 (17 U.S.C. §§ 101 et. seq., and all amendments thereto), and 17 U.S. Code § 501, Defendants' deliberate, malicious and ongoing violations of federal Copyright Laws, Defendant repeatedly and intend to and will continue to infringe on Plaintiff's copyrights. Plaintiff has repeatedly communicated with Def SPCBT employed counsel, Suzanne Gardner and her SPC General Counsel office, which agreed in intent to make SPC stop all contact with Plaintiff. In Sept or Oct 2020, Defendant maliciously removed Plaintiff's ability to see Defendant's continued use, infringement and nonpermitted publishment of Plaintiff's copyrighted properties.

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.

JURY TRIAL DEMANDED. \$2,000,000,000.00 punitive and compensatory damages. Immunity from Prosecution, violating Plaintiff's copyrights, in all states partnered and third party partnered with the Defendant. Fulfillment of all standard, reasonable, and exemplary and nonstandard ADA Disability Accommodations and other accommodations and assistance, including; waiver of all school and graduation requirements, and more as to be expounded and explained later while in open litigation.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Permanent Injunction barring all contact. Other and more required and needed as will be explained and written out as litigation proceeds. Other and more as determined by the US Dept of Justice and the Jury selected in final. US DOJ and FBI investigation against SPC and its corrupt employees. Convene FL Grande Jury to investigate and discover and then-after punish any further violations of SPC and defendant's employees. Degree with ALL import of all university courses. Certification of student body and all disabled students. Appt and Notorious Statement of original, first black SPC president known to students and Plaintiff. Other monies and payments to pay for Plaintiff's finalization of law degree hindered and destroyed by defendant .

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: 11/30/2020

Signature of Plaintiff /s/ Brian Dodd

Printed Name of Plaintiff BRIAN DODD

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____