

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIRCUIT CIVIL**

CHRISTOPHER GLEASON,
A Florida citizen, Elector, and
Candidate for Supervisor of
Elections, Pinellas County

Plaintiff,

vs.

**CASE NO.: 24-003717-CI
IMMEDIATE HEARING
REQUESTED**

JULIE MARCUS, in her official
capacity as Supervisor of Elections of
Pinellas County, Florida, **DUSTIN**
CHASE, in his official capacity as
Deputy Supervisor of Elections of
Pinellas County Florida, **MATT**
SMITH, in his official capacity as
General Counsel for Pinellas County
Supervisor of Elections, 99 John Does,
Individually; 99 Jane Does,
Individually

Defendants.

MOTION FOR RECONSIDERATION

COMES NOW the Plaintiff, Christopher Gleason, and respectfully moves this
Court to reconsider its Order dated August 22, 2024, denying the Plaintiff's request

for a Temporary Injunction without Notice. In support of this Motion, Plaintiff states the following:

1. Introduction

On August 20, 2024, the Plaintiff filed a Verified Complaint seeking emergency injunctive relief to prevent the unlawful counting of improperly obtained vote-by-mail ballots in the upcoming August 20, 2024, election. The Court denied the request for a temporary injunction, citing a lack of verification and insufficient demonstration of immediate and irreparable harm.

2. Grounds for Reconsideration

The Plaintiff respectfully asserts that the Court did not fully appreciate the significant and irreversible constitutional crisis that will result from certifying an election tainted by over 219,695 illegally requested vote-by-mail ballots, which lack any verifiable chain of custody. In addition to the fact that there was clear evidence of a significant cyber breach when VR Systems the service provider for the Pinellas County Website, The Vote By Mail Ballot request system and election night reporting was 100% compromised via it's unlawful transmission of election data via modems transmitting election results via the internet. This situation

presents a grave threat not only to the integrity of the election in Pinellas County but to the nation security of the United States of America, but also to the millions of Florida, voters who have irrefutably been disenfranchised. .

A. Immediate and Irreparable Harm

The Plaintiff contends that the certification of the election, prior to resolving the substantial issues surrounding the illegal vote-by-mail ballots, will lead to the intermingling of lawful and unlawful ballots. Once these ballots are counted and intermingled, it will be impossible to distinguish between them, effectively nullifying any potential judicial remedy and causing irreparable harm. The constitutional right to vote, and the integrity of the electoral process, will be irrevocably compromised if unlawful ballots are allowed to dilute the legitimate votes of citizens.

Moreover, the lack of a verifiable chain of custody for these 219,695 ballots raises serious questions about the legitimacy of the election results. The fact that 219,695 vote by mail ballots were illegally requested by Defendants Julie Marcus, Dustin Chase and Matt Smith are irrefutable. and This not only undermines public confidence in the electoral process but also poses a significant risk of legal

challenges that has created a Constitutional crisis the like of which could plunge the United States into a state of civil war and unrest, and destabilize the governance of Pinellas County, the State of Florida and the United States of America as a whole.

B. The Dire Constitutional Crisis at Hand

The potential certification of an election marred by such a significant degree of alleged fraud constitutes a dire constitutional crisis. The foundation of our democracy rests on the principle that each citizen's vote is counted fairly and without dilution by unlawful ballots. Allowing this election to proceed without first addressing these critical issues could set a dangerous precedent, inviting further erosion of public trust in the electoral system.

Certifying the election without first ensuring the legality of all ballots would not only disenfranchise lawful voters but also irreparably harm the democratic process. The consequences of such an action extend beyond this single election, threatening the core values of electoral integrity and public confidence that underpin our entire system of government.

3. Legal Standards and Public Interest

The standard for granting a temporary injunction includes a substantial likelihood of success on the merits, the presence of immediate and irreparable harm, the balance of harms, and the consideration of the public interest. Here, the Plaintiff contends that all these factors weigh decisively in favor of granting the requested injunction.

Substantial Likelihood of Success: The Plaintiff's claims are supported by substantial evidence indicating that over 219,695 vote-by-mail ballots were requested and distributed illegally, without proper verification or chain of custody. This evidence strongly suggests that the election could be compromised by the inclusion of these unlawful ballots.

Immediate and Irreparable Harm: As discussed, the harm posed by certifying the election under these circumstances is both immediate and irreparable. Once unlawful ballots are intermingled with lawful ones, it will be impossible to rectify the situation, leading to a permanent dilution of lawful votes.

Balance of Harms: The harm to the Plaintiff and the electorate from denying this injunction far outweighs any inconvenience to the Defendants. Ensuring the integrity of the election is paramount, and any delay in certification is justified by the need to resolve these serious legal issues.

Public Interest: The public interest is unequivocally served by maintaining the integrity of the electoral process. Allowing the certification of an election tainted by massive vote-by-mail fraud would undermine public confidence in the democratic system and set a dangerous precedent for future elections.

4. Request for Relief

For the reasons stated above, the Plaintiff respectfully requests that this Court reconsider its Order dated August 22, 2024, and grant the Plaintiff's request for a Temporary Injunction to prevent the certification of the election until the issues regarding the vote-by-mail ballots are fully adjudicated.

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Reconsider its previous Order and grant the requested Temporary Injunction.

2. Halt the certification of the August 20, 2024, election until the Court has had an opportunity to fully consider the legality of the vote-by-mail ballots and the total lack of chain of custody that the Defendants have willfully, knowingly and maliciously concealed, delayed refused to in question.
3. Grant any other relief this Court deems just and proper.

DATED: August 22, 2024

Respectfully submitted,

/S/ Christopher Gleason

Christopher Gleason

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Exhibits to be Attached:

- Exhibit A: Copy of the Court's Order dated August 22, 2024.
- Exhibit B: Verified Complaint.

- Exhibit C: Evidence supporting the likelihood of unlawful ballots being counted.