

**- Exhibit B: Verified Complaint**

**Filed Earlier 08/22/2024 at 2:07PM**

**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.

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**MEMORANDUM IN SUPPORT OF PLAINTIFF'S EMERGENCY  
MOTION FOR INJUNCTIVE RELIEF TO ENFORCE FLORIDA'S  
PUBLIC RECORDS ACT, FOR DECLARATORY JUDGEMENT TO  
CEASE ELECTION FRAUD AND REQUEST FOR IMMEDIATE  
HEARING**

Plaintiff Christopher Gleason, is citizen of the state of Florida, resident of Pinellas  
County, active registered Elector, candidate for the office of Pinellas County

Supervisor of Elections, and taxpayer filed an Emergency Motion for Injunctive Relief to Enforce Florida's Public Records Act, For Declaratory Judgement to Cease Election Fraud and Request For Immediate Hearing and submits this Memorandum in support of same and states as follows:

## **INTRODUCTION**

Plaintiff, Christopher Gleason, respectfully submits this Memorandum in Support of his Emergency Motion for a Temporary Restraining Order ("TRO") and Preliminary Injunction against Defendants Julie Marcus, Dustin Chase, Matt Smith, and unnamed Defendants John Does 1-99 and Jane Does 1-99. This Memorandum is submitted to prevent the unlawful counting of improperly obtained and distributed vote-by-mail ballots in the August 20, 2024, election. Plaintiff seeks immediate judicial relief to safeguard the integrity of the election process and to protect the fundamental right to vote.

## **BACKGROUND**

The Verified Complaint (attached as Exhibit 1) alleges significant violations of Florida election law by the Defendants. On or around June 23, 2024, Defendants ordered and distributed 219,695 vote-by-mail ballots without obtaining the required consent from voters, in direct violation of Florida Statutes §§ 101.62 and 104.0616. These actions were followed by the distribution of 234,733 vote-by-mail ballots on

July 16, 2024, of which 35,756 ballots were sent to incorrect or undeliverable addresses (Exhibit 2: USPS and NCOA Database Results).

Upon information and belief thousands of vote by mail ballots sent out to electors who no longer reside in Florida or Pinellas county and vote by mail ballots sent to undeliverable as addressed addresses are showing as being cast in the Statewide Vote By Mail Reports made available from the Florida Division of Elections website at <https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports>

These acts constitute serious violations of Florida election law, present a substantial risk of voter fraud, and threaten the integrity of the August 20<sup>th</sup> election.

The lack of transparent and definitive information about the number of legitimate vote by mail ballots and votes cast by actual Electors disturbingly allows for the invention of new votes that were not validly cast by any actual Electors. Clearly only ballots for which **CHAIN OF CUSTODY** can be established from an actual Elector to the ballot as voted can qualify as a valid vote. Ballots without any chain of custody of its validity—is a nullity. It cannot be a ballot if no voter or Elector can be shown to have cast that ballot. The essence of a ballot is a vote cast by an Elector. A purported ballot separated from its supposed voter cannot constitute a vote or an actual ballot.

Per Fla St Sec. 101.015, F.S., and Florida Division of Elections Regulation 1S-2.015 requires that each county to develop security procedures for elections, which include the requirements that (emphasis added):

*(k) Transport of Ballots and/or Election Materials. The security procedures shall describe the steps necessary to ensure a complete record of the chain of custody of ballots and/or election materials and shall include:*

- 1. A description of the method and equipment used to transport all ballots and/or election materials;*
- 2. A method of recording the names of the individuals who transport the ballots and/or election materials from one site to another and the time they left the sending site; and*
- 3. A method of recording the time the individuals who transport the ballots and/or election materials arrived at the receiving site and the name of the individual at the receiving site who accepted the ballots and/or election materials.*

*(l) Receiving and Preparing the Ballots for Central and Regional Counting. The security procedures shall describe the process of receiving and preparing voted ballots, election data and/or memory devices for counting to include, at a minimum, the following:*

- 1. Verification that all of the ballot containers are properly secured and accounted for and that the seal numbers are correct;*
- 2. Verification that the ballot container(s) for each precinct contain voted ballots including provisional ballots, unused ballots, spoiled ballots and write-in ballots as shown to exist on the forms completed by each election board for that purpose;*
- 3. Inspection of the paper ballots to identify those that must be duplicated or upon which voter intent is unclear, thus requiring a determination by the Canvassing Board. A record shall be kept of which paper ballots are submitted to the Canvassing Board and the disposition of those paper ballots; and*
- 4. Description of the process for duplicating and recording the voted paper ballots which are damaged or defective.*

*(m) Tabulation of Vote.*

- 1. The security procedures for use with central and regional processing sites shall describe each step of a ballot tabulation to include, at a minimum, the following:*

- a. Counting and reconciliation of voted paper ballots;*
  - b. Processing, tabulation and accumulation of voted ballots and election data;*
  - c. Processing and recording of all write-in and provisional ballots;*
  - d. The process for handling unreadable ballots and returning any duplicates to tabulation;*
  - e. Backup and recovery of tabulated results and voting system programs for electronic or electromechanical voting systems; and*
  - f. Describe the procedure for public viewing of the tabulation process and access to results.*
- 2. Security procedures shall describe the steps necessary for vote tabulation in the precincts.*
  - 3. The security procedures for use in the precincts shall include procedures that describe each step of ballot tabulation to include, at a minimum, the following:*
    - a. Printing of precinct results and results from individual tabulating devices;*
    - b. Processing and recording of write-in votes;*
    - c. Endorsing a copy of the precinct results by the Election Board;*
    - d. Posting of precinct results;*
    - e. Transport of precinct results to central or regional site;*
    - f. Consolidation of precinct and provisional ballot results; and*
    - g. Describe the process for public viewing of the tabulation process and access to results.*
  - 4. The procedures for resolving discrepancies between the counted ballots and voted ballots and any other discrepancies found during the tabulation process shall be described.*

Defendants Julie Marcus, Dustin Chase and Matt Smith knowingly and willingly have been unlawfully concealing, delaying and refusing to provide Plaintiff a candidate for the office of Supervisor of Elections and other Pinellas County Electors access to Public Records and Official Election records in order to prevent the discovery of their fraudulent activities and conspiracy to deprive voters of their voice, their right to cast a ballot and have their votes accurately counted in elections.

## **LEGAL STANDARD**

To obtain a temporary restraining order or preliminary injunction, the Plaintiff must establish the following four elements:

1. **A substantial likelihood of success on the merits;**
2. **A substantial threat of irreparable injury if the injunction is not granted;**
3. **That the threatened injury to the plaintiff outweighs any potential harm to the defendant; and**
4. **That the injunction will not disserve the public interest.**

“[A] party seeking injunctive relief must show (1) irreparable harm, (2) an adequate legal remedy, and (3) the existence of a clear legal right.” *Murtagh v. Hurley*, 40 So. 3d 62, 66 (Fla. 2<sup>nd</sup> DCA 2010) (citing *Zimmerman v D.C.A. at Welleby, Inc.*, 505 So. 2d 1371, 1372-73 (Fla. 4<sup>th</sup> DCA 1987)).

## **ARGUMENT**

### **I. PLAINTIFF HAS A SUBSTANTIAL LIKELIHOOD OF SUCCESS ON THE MERITS**

The Plaintiff is likely to succeed on the merits of his claims due to the clear violations of Florida election law by the Defendants. The Defendants' actions constitute breaches of the following statutes:

- **Florida Statute § 101.62:** The Defendants violated this statute by ordering and distributing vote-by-mail ballots without proper voter consent, which is required by law.
- **Florida Statute § 101.68:** The improper verification of signatures and the sending of ballots to incorrect addresses violate the statutory requirements for canvassing vote-by-mail ballots.
- **Florida Statute § 104.041:** Sending vote by mail ballots to addresses where voters no longer reside, and thus potentially facilitating fraudulent voting, constitutes a violation of this statute.
- **Florida Statute § 104.0616:** The Defendants ordered vote-by-mail ballots on behalf of individuals who were not immediate family members, which is explicitly prohibited by this statute.
- **Florida Statute § 838.022:** The Defendants willfully and knowingly obtained a benefit for themselves and others, harmed the Plaintiff, other candidates for offices on the ballot and all the electors of Pinellas County by willingly and knowingly Obstructing, delaying, and preventing the communication of



information relating to the commission of a felony that directly involves or affects the government entity served by the public servant or public contractor.

The evidence presented in the Verified Complaint (Exhibit 1), the USPS and NCOA Database Results (Exhibit 2), and the sworn affidavits from affected voters (Exhibit 3) demonstrate a strong likelihood of success on the merits of these claims.

## **II. PLAINTIFF FACES A SUBSTANTIAL THREAT OF IRREPARABLE INJURY**

The Plaintiff, other candidates and the electorate face a substantial threat of irreparable injury if the TRO and preliminary injunction are not granted. The unlawful counting of improperly obtained vote-by-mail ballots will dilute lawful votes and potentially alter the outcome of the election. The right to vote is a fundamental right protected under both the Florida and United States Constitutions. Any infringement upon this right constitutes irreparable harm. Courts have consistently recognized that the denial or dilution of the right to vote constitutes irreparable injury. See *Reynolds v. Sims*, 377 U.S. 533, 555 (1964); *Elrod v. Burns*, 427 U.S. 347, 373 (1976).

## **III. THE THREATENED INJURY TO PLAINTIFF OUTWEIGHS ANY HARM TO DEFENDANTS**

The harm to the Plaintiff, other candidates, Pinellas County Electors, citizens and taxpayers from the denial of injunctive relief far outweighs any potential harm to the Defendants. Plaintiff and other candidates stand to have their electoral chances

compromised by the Defendants knowing and willing illegal actions, which will result in an unfair and fraudulent election outcome. Conversely, the Defendants will suffer no undue harm from being required to adhere to the lawful procedures for handling and counting vote-by-mail ballots, as required by Florida law, and be held accountable for any fraudulent activity connected to the disenfranchisement of Pinellas County candidates, electors and citizens.

#### **IV. THE INJUNCTION WILL SERVE THE PUBLIC INTEREST**

Granting the requested injunctive relief serves the public interest by ensuring the integrity of the election process. The public has the highest and most important compelling interest in maintaining the legitimacy of elections, which is foundational to a functioning democracy. Ensuring that all ballots and votes counted are lawful and that the election process is free from fraud is essential to preserving public confidence in the electoral system. The Florida Supreme Court has emphasized the importance of election integrity, stating, “The integrity of the electoral process is a paramount concern in our democratic system.” *Becker v. King*, 307 So. 2d 855, 859 (Fla. 1975).

Defendants Julie Marcus, Dustin Chase and Matt Smith are knowingly and intentionally violating numerous Florida Statute § 101.62, Florida Statute § 104.0616, Florida Statute § 101.68, Florida Statute § 838.022 by continuing refusal or inability to comply with Florida election law or conduct elections with an

acceptable level of transparency and professionalism undermines public trust in the election process. Provisions like Florida Statute § 101.62, Florida Statute § 104.0616, and Rule 1S-2.055, F.A.C. are designed to ensure an orderly and transparent process for conducting elections that include the requesting vote by mail ballot, the sending of vote by mail ballots to voters, and ensuring that there is no vote by mail fraud to include ballot harvesting and the illegal casting of vote by mail ballots as was seen in the 2020 and 2022 elections. These statutes are designed to avoid fraud and the appearance of fraud. Whether through malfeasance or incompetence, Defendants Julie Marcus, Dustin Chase and Matt Smith knowingly and intentionally have demonstrated that the public cannot rely on the Pinellas County Supervisor of Elections to comply with these laws. Injunctive relief is necessary to maintain public trust in Florida's election process, to prevent fraud or the appearance of fraud, and to prevent Plaintiff, other candidates and the public from suffering irreparable harm through the de-legitimization of Florida's election process and the irrecoverable Constitutional crisis this creates.

**I. Plaintiff will suffer irreparable harm absent a temporary mandatory injunction.**

Plaintiff, other candidates for offices, citizens, taxpayers and electors suffer a continuing and ongoing harm from Defendants Julie Marcus, Dustin Chase and Matt Smith's knowing and intentional misconduct because it damages public confidence that Plaintiff's election was conducted lawfully and free from vote by mail fraud, the

fraudulent casting of vote by mail ballots and the counting of fraudulent vote by mail ballots. Every day that Defendants Julie Marcus, Dustin Chase and Matt Smith's knowingly and intentionally suspect activities and unlawful processing of vote by mail ballots, that were not actually requested by voters on Sunday June 23, 2024 continues, suspicions continue to grow and the irreparable injury to the Plaintiff, to other candidates and to voters festers. The harm caused by the knowing and intentional behavior of Defendants Julie Marcus, Dustin Chase and Matt Smith increases every minute the Pinellas County Supervisor of Elections Office is allowed to continue processing and counting unlawfully requested vote by mail ballots, processing and counting unlawfully requested vote by mail ballots sent to undeliverable mailing addresses and the non-transparent processes that were taken throughout every step of administering this election and others under false claims of elections security redactions, that were previously utilized and are currently utilized to conceal widespread election fraud, misfeasance, malfeasance, neglect of duty and official misconduct on the part of the Defendants. As long as Defendants Julie Marcus, Dustin Chase and Matt Smith retains unsupervised, unaccountable, and unfettered access to ballots, election records, public records, they will be able to destroy evidence of any errors, accidents, or unlawful conduct, making it nearly impossible for an aggrieved party to prosecute their claims or discover later what has actually occurred. Plaintiff's interests, the interest of other candidates and the

interests of voters – in halting ongoing election fraud will be irreparably harmed absent an immediate injunction. See *Harbaugh v. Greslin*, No. 03-61674-CIV, 2004 WL 5599932, at \*2 (S.D. Fla. Dec 14, 2004) (finding irreparable injury where plaintiff demonstrated “the existence of an inference of fraud” in ongoing transfers of technology).

No adequate legal remedy exists apart from a temporary mandatory injunction to protect the ballots, voting systems and the process.

**II. Plaintiff has a clear legal right to a fair election, public records requested and election records that show the conduct of election was administered lawfully.**

**A. Plaintiff has a legal right to have the requested public records under the Florida Constitution, Florida Statutes and Federal Statutes.**

Plaintiff, other candidates, citizens, taxpayers and electors have a clear right to the lawful, transparent administration of elections. Article I, Section 24 of the Florida Constitution provides: “Every person has the right to inspect or copy any public record made or received in connection with the official business of any public body, officer, or employee of the state, or person acting on their behalf,” which “specifically included...counties, municipalities, and districts; and each constitutional officer, board, and commission, or entity created pursuant to law or this Constitution.” This constitutional right is accompanied by a statutory duty on

Defendants Julie Marcus, Dustin Chase and Matt Smith's part to permit the record to be inspected and copied by any person desiring to do so, at any reasonable time, under reasonable conditions, and under supervision by the custodian of the public records." Fla Stat. Ann 119.07(1)(a). A citizens right to inspect public records includes the right to inspect ballots, which are subject to section 119.07(1) inspect election records, inspect public records related to requests made by voters for vote by mail ballots 101.62(1), right to inspect Electronic Voting System, manuals/operators guides that were used to administer elections Fla. Att'y Gen. Op AGO 2003-26

Likewise, federal law requires that" [e]very officer of elections shall retain and preserve for a period of twenty-two months from the date of any general, special or primary election of which candidates for the office of...Member of the Senate...[is] voted for..." 52 U.S.C. ss 20701.

**B. Plaintiff, other candidates and voters of Florida have a clear and legal right to the fair conduct of elections.**

Further, as the Florida Supreme Court has frequently reiterated, the voters "are possessed of the ultimate interest...in the process of that government, which for the most of our citizens means participation via the election process." *Boardman v. Esteve*, 323 So. 2d 259, 263 (Fla. 1975). Defendant's knowing and intentional ongoing violation of the United States Constitution, the Florida Constitution, Florida

Election code and Federal Election code jeopardize the integrity of the 2024 primary election and the 2024 general election. The very purpose of these statutes is to prevent election fraud, and the appearance of election fraud, by allowing interested parties, including campaigns, to track and observe the processing of requesting vote by mail ballots, the processing of ballots, the tallying of votes, and the administration of elections using electronic voting systems.

### **CONCLUSION**

Plaintiff respectfully moves the court to grant, Emergency Motion for Injunctive Relief to Enforce Florida's Public Records Act, For Declaratory Judgement to Cease Election Fraud, and Request for Immediate Evidentiary Hearing.

As the Florida Supreme Court has recognized: "News delayed is news denied." *State ex Rel. Miami Herald Pub'g Co v McIntosh*, 340 So 2d 904,910 (Fla. 1976).

### **EXHIBITS ATTACHED:**

1. Exhibit 1: Verified Complaint
2. Exhibit 2: USPS and NCOA Database Results
3. Exhibit 3: Sworn Affidavits from Voters

Respectfully submitted this 22<sup>nd</sup> day of August, 2024.

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

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ProSe



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

**CHRISTOPHER GLEASON,**  
A Florida citizen, Elector, and  
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## **BACKGROUND**

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These acts constitute serious violations of Florida election law, present a substantial risk of voter fraud, and threaten the integrity of the August 20<sup>th</sup> election.

The lack of transparent and definitive information about the number of legitimate vote by mail ballots and votes cast by actual Electors disturbingly allows for the invention of new votes that were not validly cast by any actual Electors. Clearly only ballots for which **CHAIN OF CUSTODY** can be established from an actual Elector to the ballot as voted can qualify as a valid vote. Ballots without any chain of custody of its validity—is a nullity. It cannot be a ballot if no voter or Elector can be shown to have cast that ballot. The essence of a ballot is a vote cast by an Elector. A purported ballot separated from its supposed voter cannot constitute a vote or an actual ballot.

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*(m) Tabulation of Vote.*

- 1. The security procedures for use with central and regional processing sites shall describe each step of a ballot tabulation to include, at a minimum, the following:*

- a. *Counting and reconciliation of voted paper ballots;*
  - b. *Processing, tabulation and accumulation of voted ballots and election data;*
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## **LEGAL STANDARD**

To obtain a temporary restraining order or preliminary injunction, the Plaintiff must establish the following four elements:

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## **ARGUMENT**

### **I. PLAINTIFF HAS A SUBSTANTIAL LIKELIHOOD OF SUCCESS ON THE MERITS**

The Plaintiff is likely to succeed on the merits of his claims due to the clear violations of Florida election law by the Defendants. The Defendants' actions constitute breaches of the following statutes:

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## **III. THE THREATENED INJURY TO PLAINTIFF OUTWEIGHS ANY HARM TO DEFENDANTS**

The harm to the Plaintiff, other candidates, Pinellas County Electors, citizens and taxpayers from the denial of injunctive relief far outweighs any potential harm to the Defendants. Plaintiff and other candidates stand to have their electoral chances



compromised by the Defendants knowing and willing illegal actions, which will result in an unfair and fraudulent election outcome. Conversely, the Defendants will suffer no undue harm from being required to adhere to the lawful procedures for handling and counting vote-by-mail ballots, as required by Florida law, and be held accountable for any fraudulent activity connected to the disenfranchisement of Pinellas County candidates, electors and citizens.

#### **IV. THE INJUNCTION WILL SERVE THE PUBLIC INTEREST**

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**I. Plaintiff will suffer irreparable harm absent a temporary mandatory injunction.**

Plaintiff, other candidates for offices, citizens, taxpayers and electors suffer a continuing and ongoing harm from Defendants Julie Marcus, Dustin Chase and Matt Smith's knowing and intentional misconduct because it damages public confidence that Plaintiff's election was conducted lawfully and free from vote by mail fraud, the

fraudulent casting of vote by mail ballots and the counting of fraudulent vote by mail ballots. Every day that Defendants Julie Marcus, Dustin Chase and Matt Smith's knowingly and intentionally suspect activities and unlawful processing of vote by mail ballots, that were not actually requested by voters on Sunday June 23, 2024 continues, suspicions continue to grow and the irreparable injury to the Plaintiff, to other candidates and to voters festers. The harm caused by the knowing and intentional behavior of Defendants Julie Marcus, Dustin Chase and Matt Smith increases every minute the Pinellas County Supervisor of Elections Office is allowed to continue processing and counting unlawfully requested vote by mail ballots, processing and counting unlawfully requested vote by mail ballots sent to undeliverable mailing addresses and the non-transparent processes that were taken throughout every step of administering this election and others under false claims of elections security redactions, that were previously utilized and are currently utilized to conceal widespread election fraud, misfeasance, malfeasance, neglect of duty and official misconduct on the part of the Defendants. As long as Defendants Julie Marcus, Dustin Chase and Matt Smith retains unsupervised, unaccountable, and unfettered access to ballots, election records, public records, they will be able to destroy evidence of any errors, accidents, or unlawful conduct, making it nearly impossible for an aggrieved party to prosecute their claims or discover later what has actually occurred. Plaintiff's interests, the interest of other candidates and the

interests of voters – in halting ongoing election fraud will be irreparably harmed absent an immediate injunction. See *Harbaugh v. Greslin*, No. 03-61674-CIV, 2004 WL 5599932, at \*2 (S.D. Fla. Dec 14, 2004) (finding irreparable injury where plaintiff demonstrated “the existence of an inference of fraud” in ongoing transfers of technology).

No adequate legal remedy exists apart from a temporary mandatory injunction to protect the ballots, voting systems and the process.

**II. Plaintiff has a clear legal right to a fair election, public records requested and election records that show the conduct of election was administered lawfully.**

**A. Plaintiff has a legal right to have the requested public records under the Florida Constitution, Florida Statutes and Federal Statutes.**

Plaintiff, other candidates, citizens, taxpayers and electors have a clear right to the lawful, transparent administration of elections. Article I, Section 24 of the Florida Constitution provides: “Every person has the right to inspect or copy any public record made or received in connection with the official business of any public body, officer, or employee of the state, or person acting on their behalf,” which “specifically included...counties, municipalities, and districts; and each constitutional officer, board, and commission, or entity created pursuant to law or this Constitution.” This constitutional right is accompanied by a statutory duty on

Defendants Julie Marcus, Dustin Chase and Matt Smith's part to permit the record to be inspected and copied by any person desiring to do so, at any reasonable time, under reasonable conditions, and under supervision by the custodian of the public records." Fla Stat. Ann 119.07(1)(a). A citizens right to inspect public records includes the right to inspect ballots, which are subject to section 119.07(1) inspect election records, inspect public records related to requests made by voters for vote by mail ballots 101.62(1), right to inspect Electronic Voting System, manuals/operators guides that were used to administer elections Fla. Att'y Gen. Op AGO 2003-26

Likewise, federal law requires that" [e]very officer of elections shall retain and preserve for a period of twenty-two months from the date of any general, special or primary election of which candidates for the office of...Member of the Senate...[is] voted for..." 52 U.S.C. ss 20701.

**B. Plaintiff, other candidates and voters of Florida have a clear and legal right to the fair conduct of elections.**

Further, as the Florida Supreme Court has frequently reiterated, the voters "are possessed of the ultimate interest...in the process of that government, which for the most of our citizens means participation via the election process." *Boardman v. Esteve*, 323 So. 2d 259, 263 (Fla. 1975). Defendant's knowing and intentional ongoing violation of the United States Constitution, the Florida Constitution, Florida

Election code and Federal Election code jeopardize the integrity of the 2024 primary election and the 2024 general election. The very purpose of these statutes is to prevent election fraud, and the appearance of election fraud, by allowing interested parties, including campaigns, to track and observe the processing of requesting vote by mail ballots, the processing of ballots, the tallying of votes, and the administration of elections using electronic voting systems.

### **CONCLUSION**

Plaintiff respectfully moves the court to grant, Emergency Motion for Injunctive Relief to Enforce Florida's Public Records Act, For Declaratory Judgement to Cease Election Fraud, and Request for Immediate Evidentiary Hearing.

As the Florida Supreme Court has recognized: "News delayed is news denied." *State ex Rel. Miami Herald Pub'g Co v McIntosh*, 340 So 2d 904,910 (Fla. 1976).

### **EXHIBITS ATTACHED:**

1. Exhibit 1: Verified Complaint
2. Exhibit 2: USPS and NCOA Database Results
3. Exhibit 3: Sworn Affidavits from Voters

Respectfully submitted this 22<sup>nd</sup> day of August, 2024.

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

[gleasonforpinellas@gmail.com](mailto:gleasonforpinellas@gmail.com)

ProSe



**UNITED STATES  
POSTAL SERVICE®**

This form may be generated as the output of address matching processing using CASS Certified™ software in conjunction with current USPS® address database files. Any facsimile must contain the same information in the same format as the printed form.

See DMM® Section 602 for more information.

## CASS™ Summary Report

A. Software			
CASS A1	1. CASS Certified Company Name Lorton Data Inc	2. CASS Certified Software Name & Version A-Qua 11.00.00.O	3. Configuration STD
	4. Z4Change Certified Company Name	5. Z4Change Certified Software Name & Version	6. Configuration
	7. eLOT® Certified Company Name Lorton Data Inc	8. eLOT Certified Software Name & Version A-Qua 11.00.00.O	9. Configuration STD
MASS A2	1. MASS™ Certified Company Name	2. MASS Certified Software Name, Version & Model No.	3. Configuration
			4. MLOCR Serial No.

B. List		
1. List Processor's Name  Lorton Data Inc	2. Date List Processed	3. Date of Database Product Used
	a. Master File 11-Jul-24	a. ZIP + 4® File 06/01/2024
	b. Z4Change	b. Z4Change
	c. eLOT 11-Jul-24	c. eLOT 06/01/2024
	d. CRIS	d. CRIS
4. List Name or ID No. (If using ID No., number must start with ID #)  505826OU.DBF	5. Number of Lists  1	6. Total Records Submitted for Processing  234,733

C. Output							
Output Rating	1. Total Coded	2. Validation Period		Output Rating	1. Total Coded	2. Validation Period	
		From	To			From	To
a. ZIP + 4/DPV Confirmed ▶	231,476	07/11/2024	09/30/2024	c. 5-Digit Coded ▶	231,924	07/11/2024	02/27/2025
b. Z4Change Processed ▶	0			d. CRRT Coded ▶	231,574	07/11/2024	09/30/2024
				e. eLOT Assigned ▶	231,473	07/11/2024	09/30/2024

D. Mailer		
I certify that the mailing submitted with this form has been coded (as indicated above) using CASS Certified software meeting all of the requirements listed in the DMM Section 602.		3. Name and Address of Mailer
1. Mailer's Signature	2. Date Signed	

E. Qualitative Statistical Summary (QSS)						
For informational Purposes Only: QSS is solely made available for the list processor's review and analysis. This information is not to be considered by the U.S. Postal Service® personnel in determining rate eligibility under any circumstances. See reverse for a detailed explanation.						
High Rise Default	High Rise Exact	RR Default	RR Exact	LACSLink®	EWS	SuiteLink®
1,976	55,723	0	0	7	0	5

**Privacy Notice:** For information regarding our Privacy Policy, visit [USPS.COM](http://USPS.COM)®.



# Instructions

## A. Software

- A1.1, 1.4, 1.7, & A2.1 – Company Name:** Enter the name for *each kind of software* as it appears on the CASS™/MASS™ certificate.
- A1.2, 1.5, 1.8, & A2.2 – Software Name and Version:** Enter name and version for *each kind of software* as it appears on the CASS/MASS certificate.
- A1.3, 1.6, 1.9, & A2.3 – Configuration:** Enter the specific software configuration parameter settings as it appears on the CASS/MASS certificate.
- A2.4 – MLOCR:** Enter the MLOCR Serial Number as it appears on the MASS Certificate.
- NOTE:** If information entered in this section represents the list processing of more than one certified company, attach a list of company names, software names and versions, as well as the configuration to code the address information used in the mailing.

## B. List

- List Processor's Name:** Enter the company name that coded the address list(s) and/or performed ZIP + 4®/DPV® confirmation using CASS Certified™ software. Attach a list if additional space is required.
- Date List Processed:** Enter the processing date for each list. If multiple lists, enter the oldest date from the list.
- Date of Database Product Used:** Enter the version date of each database package used for processing. If multiple lists, enter the oldest version date from the lists.
- List Name or ID No.:** Print the name or identification number of the address list. If more than one list is used, leave blank. If the identification number is used, the number MUST be preceded by "ID#".
- Number of Lists:** Enter the number of lists used to produce the mailing.
- Total Records Submitted for Processing:** Enter the total number of address records (*from all lists in item B5*) submitted at the time the list(s) was coded.

## C. Output

- Total Coded:** Enter the total number coded.
- Validation Period:** Coding must be done using a product release that is within the USPS Product Cycle, as provided in the table below:

Product Name	From Date	To Date
<b>ZIP + 4 / DPV Confirmed</b>	The date the file was processed, which is 10 - 15 days before the Product (Publish) Date and no later than the file Expiration Date (last permissible use date).	Last day of the month following the Expiration Date (last permissible use date) of the Date of Database Product used (identified in Section B.3).
<b>Five-Digit Coded</b>	The date the file was processed, which is 10 - 15 days before the ZIP + 4, Carrier Route Product Publish Date and no later than the ZIP + 4, Carrier Route Product Expiration Date (last permissible use date) or 180 days before the Five-Digit ZIP product file date.	180 days after the Expiration Date (last permissible use date) of the Product Date used. NOTE: This is different than the other dates. This one is calculated, not hard-coded.
<b>Total Carrier Route Coded</b>	The date the file was processed, which is 10 - 15 days before the Product (Publish) Date and no later than the file Expiration Date (last permissible use date).	Last day of the month following the Expiration Date (last permissible use date) of the Product Date used.
<b>eLOT® Sequence No. Assigned</b>	The date the file was processed, which is 10 - 15 days before the Product (Publish) Date and no later than the file Expiration Date (last permissible use date).	Last day of the month following the Expiration Date (last permissible use date) of the Product Date used.

Release Date (Posted)	Product Date	Required Use Date	Expiration Date (Last permissible use date)	Last Permissible Mailing Date
Use of file released in...	(Publish Date)	Must begin no later than...	And must end no later than...	
Mid-November	December 1	January 1	February 28/29	March 31
Mid-December	January 1	February 1	March 31	April 30
Mid-January	February 1	March 1	April 30	May 31
Mid-February	March 1	April 1	May 31	June 30
Mid-March	April 1	May 1	June 30	July 31
Mid-April	May 1	June 1	July 31	August 31
Mid-May	June 1	July 1	August 31	September 30
Mid-June	July 1	August 1	September 30	October 31
Mid-July	August 1	September 1	October 31	November 30
Mid-August	September 1	October 1	November 30	December 31
Mid-September	October 1	November 1	December 31	January 31
Mid-October	November 1	December 1	January 31	February 28/29

## D. Mailer

- Signature:** Signature of individual who processed the list, or the mailer's representative.
- Date Signed:** Enter the date this form is signed.
- Name & Address of Mailer:** Enter the name and address of the individual whose signature appears in item D1.

## E. Qualitative Statistical Summary (QSS)

This information allows mailers and list processors to evaluate the quality of their address list processed through CASS software before its contents enter the mailstream. Although these addresses remain eligible for postal automation rate discounts, significant number of Highrise default/rural route default matches increases the costs and reduces the efficient delivery of this mail. Mailers should research to obtain secondary unit designator address information or highrise addresses and specific box number information for rural route addresses which are coded to default records on the National ZIP + 4 File.

### Highrise Default/RR Default

Entries in this box show the number of addresses that were default matched. Defaults are matches made to addresses that contain invalid/missing secondary address or box information. A highrise default contains the building street address in the primary range field and spaces in the secondary range field. A rural route default contains the route number in the primary name but also has spaces in the primary address range.

### LACSLink® System

Entries in this box show the number of addresses which have been converted through the LACSLink process. LACSLink is a data product provided by the Postal Service to allow addresses that have been converted due to addresses that have been renamed or renumbered, or for 911 emergency systems to be linked with their new address.

### Early Warning System (EWS)

Entries in this box show the number of addresses on the processed address list that are new addresses not in the current U.S. Postal Service® ZIP + 4 File. These addresses are, however, valid addresses as formatted and should not be changed in any way since the U.S. Postal Service will assign ZIP + 4's to these addresses on the next monthly ZIP + 4 File.

### SuiteLink® System

Entries in this box show the number of ZIP+4/DPV confirmed addresses that matched to a highrise default, and the SuiteLink process returned the appropriate suite number. Only SuiteLink enabled software will return a value in this box (*Check with your software vendor for obtaining this option*). These address records are valid delivery points by the U.S. Postal Service. Addresses that are not confirmed by DPV are either new addresses not available on the current Delivery Sequence File, or are not valid and the list holder should further investigate to determine the accuracy of these addresses. Mailers should make every effort to ensure the quality of their address list(s).

## CASS Certified ZIP + 4 Processing Summary

5058268 / SXG11418  
 PIN\_VBM\_43887

### Assignment Summary

Assignment	Quantity	Percent
ZIP Codes	231,924	98.80%
ZIP + 4 Codes	231,473	98.61%
Delivery Point Codes	231,476	98.61%
Carrier Route Codes	231,574	98.65%
LOT Codes	231,473	98.61%
LOT Order Codes	231,473	98.61%
County Codes	231,924	98.80%
Assigned/No Delivery	4	0.00%
Foreign	331	0.14%

### Address Type Summary

Address Type	Quantity	Percent
Street	170,525	72.65%
PO Box	2,988	1.27%
High-rise	57,699	24.58%
Rural Route	0	0.00%
Firm	3	0.00%
General Delivery	3	0.00%
Military	250	0.11%
Unique	23	0.01%
<b>Total</b>	<b>231,473</b>	<b>100.00%</b>

### Qualitative Statistical Summary

Assignment	Quantity	Percent
DPV Confirmed	231,476	98.61%
EWS Matches	0	0.00%
High-rise Default	1,976	0.84%
High-rise Exact	55,723	23.74%
Suite <sup>Link</sup> Matches	5	0.00%
LACS <sup>Link</sup> Convertible	108	0.05%
LACS <sup>Link</sup> Conversions	7	0.00%
Rural Route Default	0	0.00%
Rural Route Exact	0	0.00%
RDI Matches	228,730	97.44%

### LACS<sup>Link</sup> Conversion Summary

Assignment	Quantity	Percent
Converted	7	0.00%
Secondary Dropped	0	0.00%
<b>Total Converted</b>	<b>7</b>	<b>0.00%</b>
No Match	93	0.04%
Cannot Convert	0	0.00%
High-rise Default	0	0.00%
<b>Total Not Converted</b>	<b>93</b>	<b>0.04%</b>

### Delivery Point Validation (DPV) Summary

DPV Status	Quantity	Percent
Primary & Secondary Confirmed	226,721	96.59%
Secondary Not Confirmed	3,970	1.69%
Secondary Missing	785	0.33%
<b>Total Confirmed</b>	<b>231,476</b>	<b>98.61%</b>
DPV Not Validated	97	0.04%
No DPV Validation attempted	3,160	1.35%
<b>Total Not Confirmed</b>	<b>3,257</b>	<b>1.39%</b>

# CASS Certified ZIP + 4 Processing Summary

5058268 / SXG11418  
PIN\_VBM\_43887

## Delivery Point Validation (DPV) Details

<b>DPV Indicators</b>	<b>Quantity</b>	<b>Percent</b>
DPV Vacant	1,623	0.69%
DPV No-Stat	3,719	1.58%
DPV PO Box Street Address	30	0.01%
DPV PO Box Only Zone	542	0.23%
DPV Door Not Accessible	152	0.06%
DPV Drop Indicator	610	0.26%
DPV Commercial Mail Receiving Agency	408	0.17%
DPV Throwback	40	0.02%
DPV No Secure Location	2	0.00%
DPV Non-Delivery Days	1,537	0.65%

<b>DPV Footnotes</b>	<b>Quantity</b>	<b>Percent</b>
AA - ZIP + 4 Match	231,574	98.65%
A1 - No ZIP + 4 Match	3,159	1.35%
BB - All Components Match DPV	229,317	97.69%
CC - Secondary Invalid, Not Required	2,870	1.22%
C1 - Secondary Invalid, Required	1,094	0.47%
F1 - Military Address	250	0.11%
G1 - General Delivery	3	0.00%
IA - Informed Address	0	0.00%
M1 - Primary Missing	2,968	1.26%
M3 - Primary Invalid	97	0.04%
N1 - Secondary Missing	786	0.33%
PB - PO Box Street Address	30	0.01%
P1 - Missing RR/HC	0	0.00%
P3 - Invalid PO/ RR/ HC	0	0.00%
RR - CMRA Match	320	0.14%
R1 - CMRA Match - No Secondary	88	0.04%
R7 - Physical Address Does Not Receive Delivery	3	0.00%
TA - Matched by Dropping Trailing Alpha	6	0.00%
U1 - Unique Address	23	0.01%

<b>DPV No-Stat Reason Code</b>	<b>Quantity</b>	<b>Percent</b>
01 - Internal Drop Address	50	0.02%
02 - CDS No-Stat	558	0.24%
03 - Collision	0	0.00%
04 - CMZ (College/Military Zone and Other Types)	7	0.00%
05 - Regular No-Stat	3,027	1.29%
06 - Secondary Required	75	0.03%

# CASS Certified ZIP + 4 Processing Summary

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PIN\_VBM\_43887

Enhanced DPV Status	Quantity	Percent
Primary & Secondary Confirmed	227,203	96.79%
Secondary Not Confirmed	785	0.33%
Secondary Missing	3,485	1.48%
Phantom Route	3	0.00%
<b>Total Confirmed</b>	<b>231,476</b>	<b>98.61%</b>
DPV Not Validated	97	0.04%
No DPV Validation attempted	3,160	1.35%
<b>Total Not Confirmed</b>	<b>3,257</b>	<b>1.39%</b>

## Error Code Summary

Error	Description	Quantity	Percent
E101	Last line is invalid or missing	2,363	1.01%
E212	Missing city and invalid ZIP	1	0.00%
E213	Invalid city and missing ZIP	45	0.02%
E214	Invalid city and invalid ZIP	52	0.02%
E216	Cannot determine city and invalid ZIP	0	0.00%
E302	Invalid or missing primary address line	154	0.07%
E412	Street name is invalid	57	0.02%
E413	Possible street matches to close to choose	0	0.00%
E420	Primary range is invalid or missing	82	0.03%
E421	Primary range is invalid for street/route/building	50	0.02%
E422	Pre-directional needed, input is invalid or missing	2	0.00%
E423	Suffix needed, input is invalid or missing	0	0.00%
E425	Suffix & directional needed, input is invalid or missing	0	0.00%
E427	Post-directional needed, input is invalid or missing	13	0.01%
E428	Invalid ZIP, cannot select an address match	0	0.00%
E429	Invalid city, cannot select an address match	0	0.00%
E430	Multiple possible address line matches	0	0.00%
E431	Urbanization needed, input is invalid or missing	0	0.00%
E439	Exact match in EWS directory	0	0.00%
E500	Other error	0	0.00%
E501	Foreign address	331	0.14%
E502	Input record entirely blank	0	0.00%
E503	ZIP not in area covered by partial ZIP+4 directory	0	0.00%
E504	Overlapping ranges in ZIP+4 directory	0	0.00%
E505	Matched to undeliverable default record	9	0.00%
E600	Identified by USPS as unsuitable for delivery of mail	4	0.00%
E601	Primary number does not DPV confirm, ZIP+4 removed	97	0.04%
<b>Total Error Codes</b>		<b>3,260</b>	<b>1.39%</b>

## NCOA<sup>Link</sup>® Processing Summary Report

5058268 / SXG11418  
PIN\_VBM\_43887

### NCOA<sup>Link</sup> Move Statistics

Assignment	Quantity	Percent
New address confirmed	2,769	1.18%
New secondary range not confirmed	25	0.01%
<b>Total new address provided</b>	<b>2,794</b>	<b>1.19%</b>
New address not available	38	0.02%
New primary address not confirmed	4,290	1.83%
<b>Total new address not available/provided</b>	<b>4,328</b>	<b>1.84%</b>
<b>Total moves</b>	<b>7,122</b>	<b>3.03%</b>

### NCOA<sup>Link</sup> Match Type

Match Type	Quantity	Percent
Individual match	2,044	73.16%
Family (Last name and address) match	741	26.52%
Business match	9	0.32%

# NCOA<sup>Link</sup> Processing Summary Report

5058268 / SXG11418

PIN\_VBM\_43887

## Move Effective Date Distribution

<b>Period</b>	<b>New Address Provided (A, 91, 92)</b>	<b>New Address Not Available (01, 02, 03)</b>	<b>New Address Not Provided (05, 14, 19)</b>
Months 0 - 3	2,178	23	4,090
Months 4 - 6	380	3	166
Months 7 - 12	110	2	31
Months 13 - 18	69	1	0
Months 19+	57	9	3
<b>Total</b>	<b>2,794</b>	<b>38</b>	<b>4,290</b>

## Move Activity by Month

<b>Month</b>	<b>Matched</b>	<b>Month</b>	<b>Matched</b>	<b>Month</b>	<b>Matched</b>
1	2,005	17	9	33	2
2	2,835	18	9	34	0
3	1,451	19	5	35	0
4	439	20	6	36	3
5	77	21	8	37	3
6	33	22	0	38	2
7	25	23	5	39	2
8	31	24	1	40	1
9	30	25	1	41	1
10	26	26	2	42	2
11	22	27	0	43	2
12	9	28	1	44	1
13	17	29	4	45	4
14	10	30	2	46	2
15	16	31	0	47	1
16	9	32	5	48	3

# NCOA<sup>Link</sup> Processing Summary Report

5058268 / SXG11418  
PIN\_VBM\_43887

## NCOA<sup>Link</sup> Return Code Summary

Return Code		Quantity	Percent
<b>NCOA<sup>Link</sup> Match - New Address Provided</b>			
A	COA Match	2,769	1.18%
91	COA Match - secondary number dropped from COA	8	0.00%
92	COA Match - secondary number dropped from input	17	0.01%
<b>NCOA<sup>Link</sup> Match - No New Address Available</b>			
01	COA Match - foreign move	1	0.00%
02	COA Match - move left no address	36	0.02%
03	COA Match - PO Box closed no forwarding address	1	0.00%
05	COA Match - a new address cannot be provided	7	0.00%
14	COA Match - new address would not convert	2	0.00%
19	Found COA - new address not ZIP + 4 or DPV confirmed	4,281	1.82%
<b>Cannot Match COA</b>			
00	No COA Match	227,097	96.75%
04	Cannot Match COA - street address with secondary	2	0.00%
06	Cannot Match COA - middle name conflict	0	0.00%
07	Cannot Match COA - gender conflict	0	0.00%
08	Cannot Match COA - conflicting instructions	0	0.00%
09	Cannot Match COA - high-rise default	1	0.00%
10	Cannot Match COA - rural default	0	0.00%
11	Cannot Match COA - insufficient COA name	0	0.00%
12	Cannot Match COA - middle name test failed	59	0.03%
13	Cannot Match COA - gender test failed	0	0.00%
15	Cannot Match COA - individual name insufficient	0	0.00%
16	Cannot Match COA - secondary number discrepancy	1	0.00%
17	Cannot Match COA - other insufficient name	1	0.00%
18	Cannot Match COA - general delivery	0	0.00%
20	Cannot Match COA - conflicting directions	0	0.00%
<b>From "Daily Delete" Process</b>			
66	Daily Delete	450	0.19%
<b>Total NCOA<sup>Link</sup> Return Codes</b>		<b>234,733</b>	<b>100.00%</b>

# NCOALink Processing Summary Report

5058268 / SXG11418  
PIN\_VBM\_43887

## Job Information

Input Filename	505826
Processing Category	NORMAL
Pre-Processes	D
Concurrent Processes	P
Post-Processes	D
Standard Output	B
Matching Logic Applied	S - Standard (Business, Individual, and Family)
Data Returned	C
Class of Mail	A
Date Completed	07/11/2024
Date Returned	07/11/2024
Processes Used to Prepare List	CASS, LACSLink, SuiteLink, DPV, eLot, EWS and NCOALink
Product Version	48 Month Hash

## Customer & Licensee Information

NCOALink Platform ID	FBDP
Licensee Company Name	Lorton Data Inc
Service Provider Type	Full
Customer ID	00DQIM
Customer Company Name	Election Watch Inc
Customer PAF ID	FBDP5182101500DQIM
List Name	Voter list

## Statistics

Total Records Processed	234,733
Records ZIP + 4 Coded	231,473
Records DPV Confirmed	231,476
LACSLink Matches	108
SuiteLink Matches	5
NCOALink Matches	7,122



## Duplicate Elimination & Suppression Processing Summary

5058268 / SXG11418  
PIN\_VBM\_43887

### Duplicate Elimination

Match Criteria  
Action  
Priority  
Duplicates File

	Quantity	Percent
Total Number of Input Records		100.00%
Internal Duplicates		
Exclusion List Matches		

### Suppression

Suppression	Match Criteria	Action	Input Records	Matches	Percent
DMA Do Not Mail					
Prison	Address only	Flag	234733	0	0.00%
Deceased					