

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

CHRISTOPHER GLEASON, a Florida Citizen, Elector
and Candidate for Supervisor of Elections, Pinellas County

Plaintiff,

v.

Case No.: 24-003717-CI
UCN: 522024CA003717XXCICI

JULIE MARCUS, in her official capacity
as Pinellas County Supervisor of Elections, et al.,

Defendants.

**SUPERVISOR DEFENDANTS' RESPONSE IN OPPOSITION TO MOTION FOR
SANCTIONS AGAINST COUNTY ATTORNEY**

All defendants sued in their official capacities as the Supervisor of Elections or employees thereof ("hereinafter Supervisor Defendants"), by and through the undersigned counsel, file this Response in Opposition to Plaintiff's Motion for Sanctions Against County Attorney dated August 30, 2024, as follows:

1. Plaintiff, *pro se*, confuses the advocacy of a position contrary to his own with attorney misconduct.
2. At the heart of his Motion for Sanctions, Plaintiff alleges the "County Attorney" made false assertions regarding the time estimate to produce records and necessity of filing the Oath of Acquisition form.
3. In fact, the legitimate position of the Supervisor Defendants was presented by the undersigned to the Court by reference to Plaintiff's own Exhibits attached to the [un]Verified Complaint at the expedited non-evidentiary Chapter 119 hearing on August 29, 2024.

4. Plaintiff's frivolous Motion for Sanctions lacks in merit and substance.

5. The Supervisor Defendants have not had the opportunity to, nor been required to, present evidence in support of the time estimate and form to date. See, however, Fla. Stat. § 101.62(2) and Administrative Rule 1S-2.043(2).

6. Plaintiff's Motion for Sanctions is therefore equally untimely as irrelevant.

WHEREFORE, the Supervisor Defendants respectfully request the Court deny Plaintiff's Motion for Sanctions Against County Attorney, and for any other and further relief the Court may deem just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was filed with the Clerk of the Circuit Court by using the Florida E-Filing Portal and simultaneously emailed to **CHRISTOPHER GLEASON**, Plaintiff at gleasonforpinellas@gmail.com on the 11th day of September 2024.

/s/ Kelly L. Vicari

KELLY L. VICARI

FBN: 88704

Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Phone: (727) 464-3354 / Fax: (727) 464-4147

Primary e-mail address: kvicari@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

/s/ Jared D. Kahn

JARED D. KAHN

FBN: 105276

Assistant County Attorney

Primary e-mail address: jkahn@pinellas.gov

Attorneys for Defendants, JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections; and Pinellas County Supervisor of Elections employees acting in their Official capacity.