

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.

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**SUPERVISOR DEFENDANTS' RESPONSE IN OPPOSITION TO MOTION FOR  
LEAVE TO AMEND COMPLAINT TO NAME KELLY L. VICARI AND JARED D.  
KAHN AS CO-DEFENDANTS FOR CONSPIRACY AND OFFICIAL MISCONDUCT**

COMES NOW, all defendants sued in their official capacities as the Supervisor of Elections or employees thereof (“hereinafter Supervisor Defendants”), by and through the undersigned counsel, and file this Response in Opposition to Plaintiff’s Motion for Leave to Amend Complaint to Name Kelly L. Vicari and Jared D. Kahn as Co-Defendants for Conspiracy and Official Misconduct, as follows:

1. On September 23, 2024, Plaintiff, CHRISTOPHER GLEASON, filed a Motion for Leave to Amend Complaint to Name Kelly L. Vicari and Jared D. Kahn as Co-Defendants for Conspiracy and Official Misconduct.
2. Plaintiff failed to attach a proposed amended pleading to the Motion.
3. “If a party files a motion to amend a pleading, the party shall attach the proposed amended pleading to the motion.” Fla. R. Civ. P. 1.190(a).
4. Plaintiff’s Motion for Leave to Amend is facially insufficient and must be denied.

**WHEREFORE**, the Supervisor Defendants respectfully request the Court deny Plaintiff's Motion for Leave to Amend Complaint to Name Kelly L. Vicari and Jared D. Kahn as Co-Defendants for Conspiracy and Official Misconduct, 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](mailto:gleasonforpinellas@gmail.com), [cpgleason72@gmail.com](mailto:cpgleason72@gmail.com) and [immutabletruth@protonmail.com](mailto:immutabletruth@protonmail.com) on the 30<sup>th</sup> day of September 2024.

**/s/ Kelly L. Vicari**

KELLY L. VICARI

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**/s/ Jared D. Kahn**

JARED D. KAHN

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Assistant County Attorney

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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.