

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

CHRISTOPHER GLEASON,

Plaintiff,

**CASE NO.: 24-003717-CI
UCN:522024CA003717XXCICI**

v.

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections;

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;

KELLY L. VICARI, in her individual and professional capacity;

JARED D. KAHN, in his individual and professional capacity;

and the **CANVASSING BOARD OF PINELLAS COUNTY**

Defendants.

**AFFIDAVIT OF CHRISTOPHER GLEASON
REGARDING CHAIN OF CUSTODY AND ANALYSIS FOR STATEWIDE
VOTE BY MAIL EARLY VOTING LIST**

**STATE OF FLORIDA
COUNTY OF PINELLAS**

BEFORE ME, the undersigned authority, personally appeared Christopher

Gleason, who, being duly sworn, deposes and says as follows:

1. Affiant's Identity:

My name is Christopher Gleason, and I am the plaintiff in the above-captioned case. I am over the age of 18, competent to make this affidavit, and have personal knowledge of the facts stated herein.

2. Purpose of Affidavit:

This affidavit is made to establish the chain of custody for the Statewide Vote By Mail Early Voting List (the "Voting List") that I obtained directly from the Florida Division of Elections at the following url:

<https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports>

3. Acquisition of Voting List:

On or about and between the dates of 07/14/2024 – 09/29/2024, I personally accessed the Florida Division of Elections secure online system for authorized individuals as clearly stated in FL Stat 101.62 and FAC 1S-2.043. I used the following secure URL:

<https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports>

provided to me by the Division of Elections to download the daily updates of the Statewide Vote By Mail Early Voting List.

4. Secure Download Process:

The Florida Division of Elections provided me access to the Voting List via the following secure link

<https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports> ,

which required my unique login credentials provided by the Division. These credentials were assigned specifically for my use as a registered recipient of the Voting List after directly registering with the State at the following url:

<https://countyballotfiles.floridados.gov/Account/Register>

5. Receipt of Voting List:

Upon logging into the secure platform between the dates of 07/14/2024 to 09/29/2024, I downloaded the Voting List, which was provided in .txt and/or .zip format. I saved the downloaded files directly to my computer under secure conditions, ensuring that the data was not altered.

6. Handling and Storage:

After downloading the Voting List, I took immediate steps to preserve the integrity of the data. The files were securely stored on my computer, which is protected by encryption and password protection. No unauthorized individuals had access to the Voting List from the time I downloaded it until it was submitted in connection with this case.

7. Integrity of the Data:

I affirm that the Voting List downloaded from the Florida Division of Elections has not been altered, modified, or tampered with in any way. The files I obtained are in the same condition as when I downloaded them directly from the Division's secure platform.

8. Submission of Voting List:

I am submitting the Voting List as evidence in this case. The data submitted is a true and accurate copy of what I obtained from the Florida Division of Elections, and it is presented in its original, unaltered form.

9. Affirmation of Chain of Custody:

I attest that I was the sole individual who downloaded, handled, and maintained the Voting List from the time of its acquisition until its submission in this case. The chain of custody has remained intact, and there have been no unauthorized accesses or alterations to the Voting List.

10. Illegally Requested Vote By Mail Ballots/ Altered Vote By Mail Election Records

I attest that on 09/03/2024 I reviewed the Pinellas County Vote By Mail Ballot Reports.

The Pinellas County Report showed that 219,675 Vote By Mail Ballots were requested on Sunday 06/23/2024. The Pinellas County Supervisor of Elections Office was closed for business on 06/23/2024.

I attest that on 09/29/2024 I reviewed the Pinellas County Report, it showed that there were now 20 Requests for Vote By Mail Ballots requested on 06/23/2024 and that now 198,166 requests for Vote By Mail Ballots were made on 09/09/2024.

11. Public Records Requests Made To Miami Dade and Pinellas County Supervisor of Elections Offices.

I attest that Public Records Requests were made to the Pinellas County Supervisor of Elections Office for the Public Records/ Election Records documenting the Vote By Mail Ballot Requests by voters.

An estimate of 18,000 hours to complete this task was provided. To provide the responsive records, this information would take less than 5 minutes to generate.

VR Systems publicly available product documentation for Vote By Mail Reports can be readily found available on the internet at the following url:

[https://content.vrsys.co/help/vf/Content/Vote by Mail/List of Vote-by-Mail Reports.htm](https://content.vrsys.co/help/vf/Content/Vote%20by%20Mail/List%20of%20Vote-by-Mail%20Reports.htm) See Exhibit 2

A request was made for the IP Addresses of the voters who made the Vote By Mail Ballot Requests on 06/23/2024 via the Supervisor of Elections Office.

See Exhibit 3

The Pinellas County Supervisor of Elections custodian of records stated that there were no “Responsive Records” related to these Vote By Mail Requests.

See Exhibit 4

This information could also be easily provided via the VR Systems Reporting Functionality as documented on the VR Systems publicly available website url:

[https://content.vrsys.co/help/vf/Content/Vote by Mail/Dialog Web Vote-by-Mail Request Queue.htm](https://content.vrsys.co/help/vf/Content/Vote%20by%20Mail/Dialog%20Web%20Vote-by-Mail%20Request%20Queue.htm) . See Exhibit 5

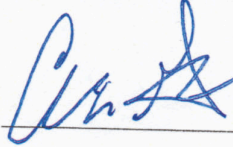
12. Numerous Requests For Vote By Mail Ballots Being Returned As Undeliverable Were Made

I attest that this information was never provided in a timely manner, despite the fact that to provide this information could have easily been generated in under 5 minutes. The information related to generating and processing undeliverable vote by mail ballots is well documented at the following publicly available VR Systems website url:

[https://content.vrsys.co/help/vf/Content/Voter Registration/How to Process Undeliverable Mail%20and%20Third-Party%20Address%20Changes.htm](https://content.vrsys.co/help/vf/Content/Voter%20Registration/How%20to%20Process%20Undeliverable%20Mail%20and%20Third-Party%20Address%20Changes.htm)
See Exhibit 6

FURTHER AFFIANT SAYETH NAUGHT.

Dated this 29th day of Sept, 2024.



Christopher Gleason

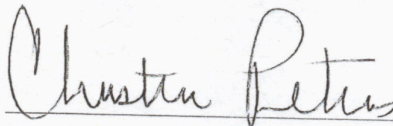
Plaintiff

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

SWORN TO and subscribed before me this 29th day of Sept, 2024 by
Christopher Gleason, who is personally known to me or who has produced FL
Drivers License as identification.



Notary Public

State of Florida

My Commission Expires: [insert date]

[Seal]



CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028