

**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; et al.,

Defendants.

**PLAINTIFF'S FIRST EXPEDITED REQUEST FOR PRODUCTION TO
DEFENDANT JULIE MARCUS**

Plaintiff, Christopher Gleason ("Plaintiff"), by and through the undersigned, and pursuant to Rule 1.350, Fla. R. Civ. P., hereby serves his First Request for Production to Defendant Julie Marcus ("Defendant Marcus") and requests that Defendant produce the following documents within (3) days:

DEFINITIONS

- **"Document(s)"** means any written, recorded, or graphic material, whether electronically stored, printed, or reproduced.
- **"Communications"** include emails, text messages, signal chat, telegram chat, whatsapp chat, social media messages, letters, or any form of correspondence.
- **"You" or "Your"** refers to the Defendant, Julie Marcus, and any agents or representatives acting on her behalf.

INSTRUCTIONS

1. **Privilege Claims:** For any document withheld on the basis of privilege, provide a privilege log specifying the nature, date, subject matter, author, and recipients.
2. **Electronic Records:** Include all responsive electronic data, such as emails, databases, electronic logs, and metadata.

REQUESTS

1. **Records of Public Requests:** All documents, including emails, logs, and correspondence, relating to the Plaintiff's public records requests submitted to the Supervisor of Elections Office from January 1, 2022, to the present.
2. **Voting System Electronic Records:** All documents and electronic records, related to the electronic voting systems used in the 2024 election, including but not limited to Runbeck, Clear Ballot, VR Systems, and ES&S, such as manuals, chain-of-custody logs, audit logs, system configurations, and any technical documentation in their original electronic format as they were generated, transmitted and stored.
3. **Internal Communications:** All internal communications (emails, text messages, or memos) between Defendant Marcus and other staff members or third parties concerning the Plaintiff or the Plaintiff's public records requests, voting system Audit Logs, EL30A reports, EL45A Reports, EL52 Reports, EL68A Reports, EL68 Reports, Machine Logs, the handling of vote-by-mail ballots, BLANK BALLOTS, Under Vote Ballots, Over Vote Ballots, ballots returned as undeliverable as addressed, ES&S Tabulators being connected to the internet, ES&S Tabulators having modems, ES&S Tabulators having network devices attached, and any election-related activities from January 1, 2023, to the present.
4. **Oath of Acquisition Documents:** All documents related to the development, implementation, or enforcement of the "Oath of Acquisition" requirement imposed on the Plaintiff or any other individual requesting public records.
5. **Vote-by-Mail Ballots:** All records relating to the distribution, handling, verification, and counting of vote-by-mail ballots during the August 2024 election, including chain-of-custody documentation, ballot request logs, ballots being returned as undeliverable as addresses, and any discrepancies noted.
6. **Chain-of-Custody Documentation:** All documents evidencing the chain-of-custody for all vote-by-mail ballots being requested, received, processed, or counted in the August 2024 election.

7. **Correspondence with Defendants:** All communications with Defendant Dustin Chase, Matt Smith, Kelly L. Vicari, Jared D. Kahn, or members of the Canvassing Board regarding the handling of public records requests, voting system Audit Logs, EL30A reports, EL45A Reports, EL52 Reports, EL68A Reports, EL68 Reports, Machine Logs, the handling of vote-by-mail ballots, BLANK BALLOTS, Under Vote Ballots, Over Vote Ballots, ballots returned as undeliverable as addressed, ES&S Tabulators being connected to the internet, ES&S Tabulators having modems, ES&S Tabulators having network devices attached, and any election-related activities from January 1, 2023, to the present, or any actions taken to respond to or prevent Plaintiff's access to records.
8. **Meeting Minutes:** All meeting agendas, minutes, notes, or recordings from any meetings held between January 1, 2024, and the present that discussed public records requests, the handling of the election, or vote-by-mail ballots.
9. **Evidence of Exemptions:** All documents or records that the Defendant claims as exempt from disclosure in response to Plaintiff's public records requests, including the legal basis for each claimed exemption.
10. **Training and Procedures Manuals:** Any manuals, guidelines, or training materials provided to staff regarding the handling of public records, processing vote-by-mail ballots, BLANK BALLOTS, or other election-related processes.
11. **Correspondence with VR Systems and Other Vendors:** All communications with VR Systems, Runbeck, Clear Ballot, ES&S, SOE Software, Scytl, or any other vendors regarding the acquisition of, contracts to purchase, operation, maintenance, or use of electronic voting systems, audit logs, reports generated, records used to administer the 2024 election or communications regarding the Plaintiff.
12. **Correspondence with FSE INC (Florida Supervisor of Elections Inc) members and vendors:** All communications with FSE INC members, including Ronald Labasky, David Ramba, and Evan Power regarding the handling of public records requests, vote-by-mail ballots, or any actions taken to respond to or prevent Plaintiff's access to records.
13. **Correspondence with any party, including members of the media and press or vendors:** Regarding the subject of BLANK BALLOTS, Under Votes, Over Votes, ES&S Tabulators with modems attached, DS-DE 40 forms, EL68A reports, EL30A reports, EL52 reports, EL52S reports, Election Summary Reports with detail, Precinct Summary Reports with Detail, Key Canvassing Reports, participation in CISA critical election infrastructure, compliance with CISA protected critical infrastructure from January 1, 2023 to present.

14. **Correspondence with Pinellas County Sheriff Bob Gualtieri:** All communications regarding ballot chain of custody, requests for uniformed and armed Sheriff deputies at polling places and at the Supervisor of Elections Offices, chain of custody of ballots, transportation of ballots by uniformed sheriff deputies, or any communications regarding Plaintiff, or James McManus.
15. **Correspondence with Clerk of Court Ken Burke or his agents or employees:** Regarding jury notices, voter roll list maintenance activities, notices of undeliverable as addressed ballots or undeliverable as addressed first class mail.

Respectfully submitted October 1, 2024.

/s/ Christopher Gleason

Christopher Gleason (Pro Se)
1628 Sand Key Estates Court
Clearwater, FL 33767
Phone: 727-480-2059
Email: gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Memorandum in Opposition to Defendants' Motion to Dismiss was served via the Florida Courts E-Filing Portal to all counsel of record on this 09/24/2024.

/s/ Christopher Gleason

Christopher Gleason (Pro Se)
1628 Sand Key Estates Court
Clearwater, FL 33767
Phone: 727-480-2059
Email: gleasonforpinellas@gmail.com