

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

JOHN WILLIAM LICCIONE,
Plaintiff,

v.

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections,
JENNIFER GRIFFITH; in her official capacity as Chair of the Pinellas Democratic
Executive Committee,

WHITNEY FOX,

MARK WEINKRANTZ,

CATHY SALUSTRI LOPER; In her role as owner and editor of The Gabber
Newspaper,

PATRICK HEINZEN; In his role as reporter for The Gabber Newspaper;
and other unknown co-conspirators,

Defendants.

Case No.: **24-003939-CI**

**FIRST AMENDED COMPLAINT
FOR ELECTORAL FRAUD AND REQUEST FOR DAMAGES, A TRIAL BY
JURY, AND INJUNCTIVE RELIEF**

Plaintiff John William Liccione, pro se, hereby submits this First Amended Complaint. The only amendment made is to correct two typographical errors in a defendant's last name: Defendant Cathy Salustri **Lopes** is amended to the correct spelling: Cathy Salustri **Loper**. This change is made in the list of Defendants above and in Paragraph 8.

INTRODUCTION

1. Plaintiff, John William Liccione, a registered Democratic voter, taxpayer, and candidate in Florida's 13th Congressional District 2024 election, brings this action seeking remedies for substantial systemic irregularities and fraudulent actions in voting processes and other events relating to the August 20th election in Pinellas County, that occurred under the supervision and/or the willful participation of the Defendants. These actions have infringed upon the integrity of the electoral process and Plaintiff's lawful rights as a candidate, a registered voter, and a taxpayer.

JURISDICTION AND VENUE

2. This Court has jurisdiction over the subject matter of this action pursuant to the laws of the State of Florida, including, but not limited to, Fla. Stat. § 104.041 regarding fraud in connection with elections. The acts in question occurred within this judicial circuit, giving this Court venue to hear this case.

PARTIES

3. Plaintiff John William Liccione is a resident of Pinellas County, Florida, and was a candidate in the Democratic primary for the U.S. House of Representatives for Florida's 13th Congressional District held on August 20, 2024. Plaintiff is also founder and CEO of three media companies: Leaks Media, LLC, RussiLeaks USA, LLC, and The Crabber News, LLC.

4. Defendant Julie Marcus is the Supervisor of Elections for Pinellas County, Florida, and is sued in her official capacity.

5. Defendant Pinellas County Democratic Executive Committee (PDEC) and its Chair, Jennifer Griffith, are responsible for the oversight of Democratic Party operations

in Pinellas County, including certain of the unlawful activities alleged herein. Jennifer Griffith is sued in her capacity as Chair of the PDEC.

6. Defendant Whitney Fox is mentioned as a beneficiary of and willing participant in the fraudulent activities described herein, in her capacity as a Congressional candidate in District 13, and is sued in her individual capacity.

7. Defendant Mark Weinkrantz is mentioned as a beneficiary of and a willing participant in the fraudulent activities described herein in his capacity as a Congressional candidate in District 13, and is sued in his individual capacity.

8. Defendant Cathy Salustri Loper is a resident of Pinellas County and is owner and editor of The Gabber Newspaper, a local newspaper in Gulfport Florida. She is sued in her capacity as owner and editor of The Gabber.

9. Defendant Patrick Heinzen is a resident of Pinellas County and is sued in his capacity as a reporter at The Gabber Newspaper.

FACTUAL ALLEGATIONS

10. On information and belief, on a single day on Sunday, June 23, 2024, an anomalously high number of absentee ballot requests, exceeding 219,000, were submitted electronically to the Pinellas County Supervisor of Elections over the Internet.

11. This statistical anomaly should reasonably have triggered an automatic or manual fraud investigation, and a temporary stay in the certification of election results in the August 20, 2024 elections in Pinellas County, pending the outcome of an investigation which should have begun as early as Monday, June 24th under Defendant Julie Marcus' supervision. On information and belief, no such fraud investigation or

temporary stay was ordered by Defendant Julie Marcus, nor by the State of Florida Supervisor of Elections.

12. On July 13, 2024, the Pinellas Democratic Party led by party chair Defendant Jennifer Griffith, hosted a Congressional District 13 candidate debate at the St. Petersburg/Clearwater Marriot hotel which had over 400 attendees. Plaintiff was not only not invited to participate, Griffith had the Pinellas Park police provide security for the event with specific instructions, on information and belief to be on the look-out for Plaintiff.

13. Plaintiff, having been denied a seat at the debate table, bought and held his own campaign event that night in a ballroom just down the hall from the Party debate. He spent over \$28,000 to host his own event which included a 5-hour open bar with 2 separate bartender stations, free hors d'oeuvres, a DJ, decorations, a 200-seat ballroom, and a security detail, and 4 campaign event workers.

14. Slightly before or after the Party's debate ended, at around 8PM, Defendant Griffith had one or more Party operatives block the hallway with tables, in what was a successful effort to force attendees to exit the hotel down the back stairwell to prevent them from attending Plaintiff's "debate after-party," to hear his speech, and to otherwise engaged directly with him in conversation.

15. The Pinellas Park police officers in attendance were eyewitnesses to the blocking of the hallway.

16. The Marriott hotel event manager, Kathryn Middleton, was not only an eye witness to the blocking of the hallway, but, given it was a fire safety hazard and obstructed the free flow of traffic on the 2nd floor ballroom hallway, she ordered Defendant Griffith and/or her agents to remove the hallway obstructions.

17. Unfortunately, it was too late. By the time the table obstructions were removed, almost all debate attendees had left the building down the back stairwell having been so coerced and intimidated into doing so by Defendant Griffith and her agents. Plaintiff's campaign event attendee count, in the end, would total less than 20 people.

18. On August 17, 2024, an insider whistleblower using the pseudonym "Tampa Girl" reported to Plaintiff via a RussiLeaks website contact form submittal that she and others were paid to mark absentee ballots en masse on behalf of one or more of Plaintiff's opponents. Said opponents one reasonably can conclude were Defendants Whitney Fox (the supposed 44-point winner), and Mark Weinkrantz (the only other man in the race).

19. Tampa Girl's allegations are provided here as submitted, verbatim:

"I hate to half to tell u bad news but there is fraud occuring in ur election. I needed the job an got paid to make balots for your opponents. I feel bad about it but need the money. Their is a lot of us working this weekend. I seen the ladys and the fat guy on the way in. I'll talk if I dont half to give back the money."

20. This illicit ballot fraud activity was the semi-final act in what was has turned out to be a broader 14-month-long criminal conspiracy by Democratic Party officials such as Defendant Jennifer Griffith, and other Defendants, to manipulate the election results in favor of Whitney Fox and against Plaintiff, by way of voter suppression, voter intimidation, fraudulent misrepresentation, defamation, assault and battery, and tortious interference in economic advantage against Plaintiff and those who voted for him, or who didn't even know he existed as the 5th candidate.

21. According to Plaintiff's RussiLeaks website session logs, the source IP address of the device Tampa Girl used to submit her August 17th communique to RussiLeaks was 146.70.183.54.

22. The IP address geolocation lookup website called ShowMyIP (<https://www.showmyip.com/bulk-ip-lookup/>), mapped this IP address to the coordinates: 25.77 N -80.168 E, on August 18, 2024.
23. These coordinates map to a wharf at the Port of Miami on Dodge Island that is used by container vessels to load/unload shipping containers, and presumably, to embark, disembark, or to house passengers and crew or other individuals of foreign or domestic origin not wishing to come ashore.
24. According to the Domain registrars GoDaddy and Cloudflare, the IP address 146.70.183.54 is registered to a Romanian-based global Internet Service Provider named M247 Europe, SRL. According to M247 Europe's website, they operate in America out of a Miami data center and also have data centers in Los Angeles, New York City, and Ashburn VA.
25. MarineTrack.com, a website which allows users to track maritime vessels worldwide, shows that a Cypriot-flagged Chinese-built container ship named ARSOS that was manufactured in China in 2007 by the Hong Kong shipbuilder Shejaing Ouhua Shipbuilding, sailed up to Miami from the Cuban Port of Mariel on August 16th-17th.
26. On August 14th at 5:23 AM EDT while the ARSOS was sailing northwest along the southwestern coast of Cuba, the ARSOS turned off its AIS transponder at coordinates N20.899N, -083.3917 14th at 5:23AM EDT so as to conceal its position. Its transponder remained off for the next while inside Cuban territorial waters for the next day in a half as it as it navigated around the western coast of Cuba.
27. On August 15th at 1:35 PM EDT, the ARGOS briefly turned on its AIS transponder at coordinates 23.1012 E, -082.7993E, just 5 nautical miles from the Cuban port of Mariel. It began sailing southeast on a course of 159 degrees directly toward the port of

Mariel. It turned off its transponder again at 6:31PM EDT on August 15th. The ARSOS would remain transponder-silent for the next 33 hours.

28. On August 17th at 3:02AM EDT, the ARSOS sent an AIS message that it was underway at 18.6 knots on a course of 61 degrees at coordinates 23.9737N, 080.9363, which is 114 nautical miles from the Port of Miami.

29. The ARSOS docked at the Port of Miami at 4:08PM EDT on August 17th, at the *exact same* wharf on Dodge Island from which Tampa Girl's source IP address had just mapped two and a half hours earlier at 1:26PM: The time she would send her ballot fraud communique to RussiLeaks.

30. According to Google Maps, there is a Florida small business HR staffing company that shows a location at that exact same wharf on Dodge Island near marine terminal 3 and a large warehouse. That business is Dojnia Human Resources and Staffing. According to Florida Secretary of State business records, the company's sole owner is April Dojnia. The registered address of the business is 1800 N Bayshore Dr, Suite 3415, Miami, FL 33132, a high-rise building just 1.8 nautical miles from the ARSOS' docking wharf on Dodge Island with a direct line of sight to the Marine Terminal 3 wharf.

31. The Pinellas Supervisor of Elections outsources the publishing of its election results to a Tallahassee IT services company named VR Systems.

32. According to a leaked NSA document reported by Politico and other media outlets some 3 years after the 2016 election, Russian intelligence hacked VR Systems during the 2016 presidential election in North Carolina and in Florida. The hack was a result of a phishing campaign launched by Russia in what was a successful effort to get Donald Trump elected. (See: POLITICO Magazine: "*How close did Russia really come to hacking the 2016 election?*")

See: <https://www.politico.com/states/florida/story/2019/12/26/politico-magazine-how-close-did-russia-really-come-to-hacking-the-2016-election-1237544>

33. Just before the polls closed here on August 20th at 7:00PM, the Pinellas Supervisor of Elections website published a link to the VR Systems election results page. When Plaintiff accessed that page, he saw all Pinellas County races showing zero votes for all candidates in every race with zero precincts reporting.

34. Some few minutes after the polls closed, the first non-zero preliminary results were posted online by VR Systems, and there was an anomaly. Every single Pinellas County race showed non-zero vote totals for all candidates, and a non-zero numbers of precincts reporting in, except one: The CD-13 Democratic primary race. VR Systems showed zero votes for all 5 CD-13 Congressional candidates, with precincts reporting in: This is a serious anomaly and a key indicator of fraud as well as of cyber-compromise of either VR Systems, the Pinellas County computer systems, or both.

35. Shortly later that evening, Plaintiff checked the results again and it showed that Whitney Fox had won the race by over 40 points over 2nd place finisher Sabrina Bousbar, with almost all precincts reporting in, and that Plaintiff had come in last with 3.9 percent of the vote.

36. Then, shortly thereafter, the VR Systems election results website became unavailable over the Internet, not only in Pinellas County, but across almost all counties across Florida. The results would not become visible, at least not to Plaintiff, until he checked them when he awoke in the morning.

37. Note: The fact that the VR Systems election results website became unreachable over the Internet is not in and of itself an indicator of fraud or hacking. However, the fact that the CD-13 race showed *zero returns and zero precincts reporting results*, just

before the outage, while all other races showed non-zero vote totals for every candidate in every other race, with a high number of precincts reporting in, is an indicator of fraud and a cyber-breach in the CD-13 Democratic primary race, specifically, and perhaps singularly.

38. One can reasonably conclude that if a precinct in CD-13 reported results for all other races, then it would have also reported non-zero results in the CD-13 race at the same time of night.

39. Further, previously on July 29th, Plaintiff's Microsoft account was hacked and his laptop was then infected, twice in the next 3 weeks leading up to the election. There were numerous unsuccessful login-attempts coming from IP addresses mapping mostly to China, a few mapped to Russia, and several more mapped to San Paulo Brazil. The IP address that was used to breach Plaintiff's account mapped to San Paulo.

40. After gaining control of Plaintiff's Microsoft account, the hacker uploaded a password-stealing trojan virus called LaZagne to Plaintiff's Microsoft OneDrive cloud storage. The trojan was then synced down to Plaintiff's laptop without him realizing it. The Lazagne trojan is known to be used by Russian, Iranian, and Chinese state actor hacking groups as published by the government sponsored MITRE-Att&CK system at attack.mitre.org.

41. On August 6th, Plaintiff's laptop began demonstrating key indicators of compromise, including the redirection of his web browser to inauthentic websites. His browser DNS lookups slowed to a crawl. Plaintiff took steps to find the malware and had believed he had disinfected the laptop. However, on August 17th, just 3 days before the election, Plaintiff's laptop once again slowed to a crawl. Then, his anti-virus

software reported that it had detected the LaZagne trojan and had removed/quarantined it.

42. This advanced persistent threat actor, in launching these cyber-attacks against Plaintiff in the last 3 weeks of the campaign, bled precious hours of Plaintiff's campaigning time as he fought to defend himself from the ongoing cyberattacks. It is form of insidious election interference by way of denial of Internet and computing services to a Congressional candidate who was in the home stretch of his primary race.

43. Thirty-nine days before the August 20th primary, on July 12, 2024, the local newspaper in Gulfport, "The Gabber Newspaper", published a fraudulent article about the CD-13 Congressional election in which The Gabber asserted falsely that there were only 4 Democratic candidates competing in the primary. Plaintiff was the 5th candidate. The article included pictures and write ups of each of the four candidates. The owner and editor of The Gabber Newspaper is Cathy Salustri Loper. The reporter who wrote the article is Patrick Heinzen,

44. Plaintiff lives 100 yards from The Gabber in Gulfport. Defendants Loper and Heinzen have both spoken to Plaintiff about him being (the only) Congressional candidate that lives in Gulfport.

45. Plaintiff would demand Loper publish a correction to their false article but Loper failed to do so. She instead attempted to rationalize her and Heinzen's decision to conceal the existence of Plaintiff and his Congressional candidacy from voters.

46. On August 30, 2024, Plaintiff submitted on behalf of his media company The Crabber News, LLC, and in his personal capacity as a Congressional candidate and registered CD-13 voter, a public records request to the Pinellas County Supervisor of Elections asking for the list of source IP addresses that were logged by the County's

computer systems of every submitter of a request for an absentee ballot on the date of July 23, 2024 – the date some 219,000 ballot requests were allegedly submitted. To date, Plaintiff has not received the requested records, nor a human response – only an automated response.

47. Plaintiff would file an election fraud complaint with the Florida Secretary of State General Council's office which was delivered to and accepted on September 9, 2024.

(EXHIBIT D).

48. Plaintiff also filed a public records request to the Florida Secretary of State on September 3, 2024, requesting records pertaining to the State's IT service contracts with VR Systems.

COUNTS

COUNT I: VIOLATION OF FLORIDA STATUTE § 104.041 - FRAUD IN CONNECTION WITH ELECTIONS

49. Plaintiff re-alleges and incorporates by reference the foregoing paragraphs. Defendants, by actions and omissions described herein, engaged in fraudulent election practices prohibited under Fla. Stat. § 104.041, which have directly impacted the integrity of the electoral process and the Plaintiff's rights as a candidate.

COUNT II: CONSPIRACY TO COMMIT ELECTION FRAUD

50. Plaintiff re-alleges and incorporates by reference the foregoing paragraphs. Defendants conspired to manipulate election results through unlawful means including, but not limited to, the submission of fraudulent absentee ballots and the suppression of

lawful votes, in violation of Florida election laws and federal statutes, thereby damaging the Plaintiff.

**COUNT III: VIOLATION OF 52 U.S.C. § 20511 - FEDERAL ELECTION
FRAUD**

51. Plaintiff re-alleges and incorporates by reference the foregoing paragraphs. Defendants engaged in actions that constitute election fraud under federal law, specifically 52 U.S.C. § 20511, by altering the outcome of an election through improper means and with intent to deceive.

COUNT IV: CIVIL RIGHTS VIOLATIONS UNDER 42 U.S.C. § 1983

52. Plaintiff re-alleges and incorporates by reference the foregoing paragraphs. Defendants, one acting under color of state law, deprived the Plaintiff of rights secured by the Constitution and laws of the United States, warranting relief under 42 U.S.C. § 1983.

COUNT V: COMPUTER FRAUD AND ABUSE ACT VIOLATION

(18 U.S.C. § 1030)

53. Plaintiff re-alleges and incorporates by reference the foregoing paragraphs. Defendants, or those acting in concert with them, knowingly and unlawfully accessed Plaintiff's computer without authorization or exceeding authorized access, and thereby

obtained information from a protected computer involved in interstate communication, resulting in damages and losses.

**COUNT VI: INTENTIONAL INTERFERENCE WITH PROSPECTIVE
ECONOMIC ADVANTAGE**

54. Plaintiff re-alleges and incorporates by reference the foregoing paragraphs. Defendants' actions have intentionally interfered with Plaintiff's prospective economic advantages, causing significant loss of business opportunities, future employment, lost future wages, and already incurred financial and reputational damages. Of note, the current salary of a sitting US Congressman is \$175,000.

**COUNT VII: VOTER INTIMIIDATION AND VOTER SUPPRESSION, CIVIL
RIGHTS VIOLATIONS**

(Specifically, as to Defendant Griffith)

**(Under Florida Section 104.0615, 104.061, the federal Voting Rights Act of
1965, the Civil Rights Act of 1957, and Title 18, Section 594.)**

55. Plaintiff re-alleges and incorporates by reference the foregoing paragraphs.

56. Defendant Griffith and her political operatives blocked the 2nd floor ballroom hallway with tables to prevent voters from attending Plaintiff's campaign event at the St. Petersburg/Clearwater Marriot hotel on July 12, 2024. She did so in full view of the Pinellas Park police and the hotel event manager and her own lawyer who attended the

event. Voters were intimidated by way of physical and verbal coercion into not exiting the hotel through the front lobby by way of the ballroom stairwell or the elevator. They were forced out the back exit stairwell and into the rain, in the dark. This represents a criminal election violation under the following federal and Florida criminal statutes.

57. **Florida Statutes Section 104.0615 - Voter intimidation or suppression prohibited:**

This law makes it a third-degree felony to use or threaten to use force, violence, or intimidation to induce or compel an individual to vote or refrain from voting. It also criminalizes attempts to prevent any eligible voter from freely exercising their right to vote.

58. **Florida Statutes Section 104.061 - Corruptly influencing voting:** This statute makes it illegal to use any device or scheme to influence voters corruptly.

59. At the federal level, several laws protect voters against suppression and intimidation, including:

60. **Voting Rights Act of 1965:** Particularly Section 11(b), which prohibits any person from intimidating, threatening, or coercing any other person for the purpose of interfering with their right to vote as they choose.

61. **Civil Rights Act of 1957:** This act, among other provisions, includes laws against conspiring to intimidate voters or to hinder the exercise of their voting rights.

62. **United States Code, Title 18, Section 594 - Intimidation of voters:** It is illegal under federal law for anyone to intimidate, threaten, coerce, or attempt to intimidate, threaten, or coerce, any other person for the purpose of interfering with their right to vote freely.

COUNT VIII: REQUEST FOR INJUNCTIVE RELIEF

63. Plaintiff seeks an emergency injunction to prevent further unlawful activities by the Defendants, to order Defendant Julie Marcus to produce requested election records

upon demand by Plaintiff, and to preserve the integrity of the electoral process, including oversight and monitoring of future elections and other such injunctive relief such as nullifying the congressional primary election, ordering a special election, and other relief as specified in the Demand for Relief section.

64. **Likelihood of Success on the Merits:** The complaint outlines substantial allegations of electoral fraud and conspiracy that, if proven, would constitute criminal violations of both Florida Statute § 104.041 and federal laws concerning election integrity.

65. **Absentee Ballot Request Gross Statistical Anomalies:** The detailed allegations provided with specificity, particularly the gross statistical anomalies in absentee ballot requests on July 23, 2024, coupled with the whistleblower's testimony supported by technical evidence (e.g., IP addresses, Chinese ship movements, the nexus in space and time of “Tampa Girl” with the Chinese container ship ARSOS, the hacking of Plaintiff’s Microsoft account and laptop by likely China, strengthens the credibility of these allegations. The involvement of key election and party officials and a hostile foreign power as alleged underscores a coordinated effort to manipulate election outcomes, thereby supporting the Plaintiff’s claims.

66. **Allegations with Specificity from Insider Whistleblower:** The likelihood of success on the merits will be increased substantially through the sworn testimony of the insider whistleblower “Tampa Girl,” before any state or federal grand jury for which she may be called to testify, and before a jury in this civil case. This whistleblower has selflessly come forward placing herself in harm’s way with claims that she and others were paid by Democratic Party officials or others (which may include agents of a hostile foreign power brought to America by way of Cuba on a Chinese-built container ship), to

mark absentee ballots en masse, specifically, in favor of the Plaintiff's opponents to his detriment and that of the voters who cast their votes for him.

This direct testimony will provide concrete evidence of deliberate manipulation and fraudulent activities within the election process. This whistleblower evidence supports allegations of a systematic effort to skew the election results, demonstrating both the scope and the specific intent required to prove electoral fraud. The involvement of an insider who participated in the alleged fraud itself provides credible, firsthand information that directly ties the fraudulent activities to the detriment of the Plaintiff's electoral chances. It can be said that the likelihood of success on the merits turns substantially on the sworn testimony and credibility of "Tampa Girl" in the minds of the jury.

67. **Irreparable Harm:** If the election results remain "certified" in the absence of a thorough investigation of these allegations, the Plaintiff's right to a fair electoral process as both a candidate and a registered voter, and of the voters' rights, would be irreparably harmed. This is particularly critical given the role of the election in determining public office holders. The harm extends beyond the Plaintiff to the electorate of the 13th Congressional District, affecting their confidence in the electoral process and their representation, and wither their votes are nullified or otherwise diluted due to election fraud.

68. **Balance of Equities:** The harm to the Plaintiff and the electorate if the injunction is not granted (i.e., one nullifying the certification of fraudulent election results), far outweighs any inconvenience to the defendants. As of the date of this filing there are 74 days until the general election on November 5th. An issuance of the requested emergency injunction is necessary to ensure there is a duly nominated

Democratic challenger to incumbent Republican Anna Paulina Luna in the general election, and to ensure also that Ms. Luna isn't handed colorable legal grounds to overturn the general election on the basis of a rigged Democratic primary were she to lose in November. The public interest in ensuring a transparent and fraud-free election process is significant and supports taking the time necessary to resolve these serious allegations.

69. **Public Interest:** Upholding the integrity of the electoral process is of paramount public interest. Granting an injunction would serve this interest by ensuring that the election results reflect the true will of the voters, free from the taint of fraud or manipulation. It is in the public's interest to address and resolve allegations of electoral fraud promptly and thoroughly, thereby reinforcing trust in the democratic process.

70. **Standard of Review on a Motion to Dismiss:** The standard of review applicable in any civil case that is to be applied by the court for a complaint to survive a motion to dismiss on failure to state a claim, is that the Court must assume that the facts and allegations as alleged by Plaintiff are to be true and taken in a light most favorable to the Plaintiff. And, considering all the reasonable inferences one can make from those facts and allegations, would Plaintiff's case be more likely than not to survive a motion to dismiss. Plaintiff's complaint meets not only the injunctive standard of review, it also meets the "surviving a motion to dismiss on failure to state a claim" standard of review, thereby increasing substantially the likelihood of success on the merits.

COUNT IX:

VIOLATION OF FLORIDA PUBLIC RECORDS SUNSHINE LAW

(as to Defendant Julie Marcus)

71. Plaintiff re-alleges and incorporates by reference the foregoing paragraphs.
72. Plaintiff is in violation of FL Section 11 in its refusal to timely product and deliver to Plaintiff the records requested on the IP addresses used by voters to submit their absentee ballot requests on the single day of June 23, 2024.
73. Production of these kinds of computer forensic records already existing as a matter of normal information technology systems operations as part of standard IT business practices and can normally be produced in less than an hour in a manner that doesn't reveal any personally identifiable information in a csv or excel file as an e-mail attachment.
74. In Florida, if a public official fails to comply with a valid public records request under the Sunshine Law, several remedies are available as specified in Chapter 119 of the Florida Statutes, as follows:
 - a. **Accelerated Hearing and Immediate Compliance (Section 119.11):** The law mandates an immediate hearing when an action is filed to enforce public records provisions, giving the case priority over others. If a court orders an agency to open its records for inspection, the agency must comply within 48 hours unless the court specifies otherwise or an appellate court issues a stay.
 - b. **Penalties for Violation (Section 119.10):** It's unlawful for any public official to violate the provisions of Chapter 119 regarding public records. Violations can lead to

suspension, removal from office, or fines depending on the severity and nature of the non-compliance.

- c. **Attorney's Fees (Section 119.12):** If a court finds that an agency unlawfully refused to allow a public record to be inspected or copied, it may award the reasonable costs of enforcement, including attorney fees, to the complainant.

COUNT X: DAMAGES

75. Plaintiff seeks compensatory damages over \$1M and notifies the Court of his intent to also seek punitive damages for the injuries and losses sustained as a result of Defendants' unlawful and tortious actions, in amounts to be determined at trial.

DEMAND FOR RELIEF

WHEREAS, Plaintiff respectfully demands the following relief:

- A. Judgment in favor of the Plaintiff on all counts;
- B. Emergency injunctive relief in the form of nullifying the August 20th Democratic primary election results in CD-13;
- C. Ordering a special election for the Congressional District 13 Democratic primary;
- D. Ordering the Pinellas County Supervisor of Election to produce and deliver to Plaintiff the public election records already requested and otherwise will reasonably request in the future, at zero cost to Plaintiff;
- E. Compensatory and punitive damages in amounts to be proven at trial;

- F. Costs of suit and attorney's fees;
- G. Any other relief the court deems just and proper.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully Submitted,



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