

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.

Defendants.

/

DEFENDANT CATHY SALUSTRI LOPER'S NOTICE OF FILING

Defendant Cathy Salustri Loper ("Loper") gives notice of filing the attached documents for the Court's consideration in connection with Plaintiff's Motion to Lift Stay (Dkt. No. 122) and Plaintiff's Motion for Leave to File Second Amended Complaint (Dkt. No. 125):

Tab	Description
1	Verified First Amended Complaint (DE 55) in <i>Liccione v. Marcus</i> , Case No. 8:24-cv-02005-SDM-NHA (M.D. Fla.) (the "Federal Case") (without exhibits)
2	Motion for Leave to File Second Amended Complaint (DE 83) in Federal Case
3	Notice of Withdrawal of Motion for Leave to File Second Amended Complaint (DE 113) in Federal Case
4	Complaint (Dkt. No. 2) in <i>Liccione v. Pinellas Democratic Executive Committee</i> , Case. No. 24-002994-CI (Fla. 6th Cir. Ct.) (the "PDEC Case")
5	First Amended Complaint (Dkt. No. 31) in PDEC Case
6	Order Granting Defendants' Motions to Dismiss (Dkt. No. 62) in PDEC Case
7	Amended Order to Show Cause (Dkt. No. 75) in PDEC Case
8	Order Dismissing Lawsuit (Dkt. No. 81) in PDEC Case
9	Debate Article (https://thegabber.com/meet-the-candidates-for-the-district-13-congressional-election/)

10	Debate News Release (https://us3.campaign-archive.com/?e=44ecd8245f&u=184627293a6f977c78f8e83b7&id=4a77ab680b)
11	Time in Courts Article (https://thegabber.com/gulfport-mayoral-candidate-john-licciones-time-in-courts/)
12	Cocktails Article (https://thegabber.com/cocktails-and-campaigns-gulfport-candidates-recrafted-as-cocktails/)

Loper asks that the Court take judicial notice of the records in the PDEC Case and the Federal Case. *See* Fla. R. Civ. P. 90.202(6). The other documents are appropriately considered because they are documents upon which Plaintiff's claims are brought and, therefore, "shall be incorporated in or attached to the pleading." *See* Fla. R.Civ. P. 1.130(a).

Respectfully submitted,

THOMAS & LOCICERO PL

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Counsel for Defendant Cathy Salustri Loper

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the **3rd** day of **June, 2025**, the foregoing document was electronically filed with the Clerk of the Court via the E-Portal, and was served this same day on all parties and attorneys of record, either via transmission of Notices of Electronic Filing generated by the E-Portal or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

/s/ James B. Lake

Attorney

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
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_____ /

TAB 1

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

JOHN WILLIAM LICCIONE,
Plaintiff,

v.

Case No. 8:24-cv-02005-SDM-NHA

RONALD DION DESANTIS, in his official capacity as Governor of Florida; **ANDREW DARLINGTON**, in his official capacity as Director of the Florida Election Crimes and Security; **CORY BYRD**, in his official capacity as Florida Secretary of State; **JULIE MARCUS**, in her official capacity as Pinellas County Supervisor of Elections, **MATT SMITH**; in his official capacity as General Counsel for the Pinellas County Supervisor of Elections; **MINDY PERKINS**, in her professional capacity as Chief Executive Officer of VR Systems, Inc.; **WENDY LINK**, in her official capacity as Palm Beach County Supervisor of Elections; **JANE DOE 1**, in her personal and professional capacities; and, additional **JOHN/JANE DOES**, in their official and individual capacities, including unknown Russian hackers who compromised election system software and the production information systems of VR Systems and their software development environment, Defendants.

VERIFIED FIRST AMENDED COMPLAINT

Plaintiff John William Liccione, pro se, brings this verified First Amended Complaint against the Defendants named above and alleges as follows:

I. INTRODUCTION

1. This case arises from systemic election fraud, foreign interference, election software and systems hacking, evidence tampering and subsequent cover-up and obstructive efforts orchestrated by state and county officials, private entities, and

others to include hostile foreign actors, acting in concert to undermine election integrity in August 20, 2024 primary and the November 5th general election. Plaintiff also alleges new death threats, extortion, and intimidation tactics employed against him after having filed this lawsuit, to suppress his claims.

2. This First Amended Complaint adds named Defendants Ronald Dion DeSantis, Andrew Darlington, Cory Byrd, Mindy Perkins, Wendy Link, Matt Smith, and Defendant “Jane Doe 1” and other unnamed Jane/John Doe defendants. It removes Defendants Dustin Chase, Jennifer Griffith, Mark Weinkrantz, Whitney Fox (already dismissed), and Nikki Fried (already dismissed).

II. JURISDICTION AND VENUE

3. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 (federal question jurisdiction) and 42 U.S.C. § 1983 (civil rights violations).

4. Venue is proper under 28 U.S.C. § 1391 because the events giving rise to this action occurred within this judicial district.

III. PARTIES

5. **Plaintiff: John William Liccione**, a Democratic candidate in the 2024 election for U.S. Representative for Florida’s 13th Congressional District and a registered voter in Pinellas County, Florida.

6. **Defendant Ronald Dion DeSantis:** Governor of the State of Florida, accused of using his position to direct this alleged Florida election fraud conspiracy, to obstruct criminal investigations by Defendants Darlington, Byrd, and others, and of undermining election integrity.

7. **Defendant Andrew Darlington:** Director of the Florida Election Crimes and Security Division, accused of using his position to further the conspiracy, obstruct investigations, and undermine election integrity.

8. **Defendant Cory Byrd:** Florida Secretary of State, the chief elections officer in Florida, accused of failing to oversee and address systemic election fraud and irregularities and to obstruct criminal investigations.

9. **Defendant Julie Marcus:** Pinellas County Supervisor of Elections, responsible for administering elections in Pinellas County and accused of participating in the cover-up of election fraud.

10. **Defendant Matt Smith:** General Counsel for the Pinellas County Supervisor of Elections, accused of obstructing investigations and concealing material records.

11. **Defendant Mindy Perkins:** CEO of VR Systems, Inc., a company responsible for providing election software to the State of Florida and at least 7 other states and is accused of enabling election fraud, the hacking of their election systems by Russia, and participating in the concealment of the hacking and fraud.

12. **Defendant Wendy Link:** Palm Beach County Supervisor of Elections, accused of failing to safeguard election systems and records against fraud and actively participating in efforts to obstruct discovery of election irregularities.

13. **Defendant Jane Doe 1:** A Florida private attorney accused of acting in furtherance of the conspiracy in coordination with Defendant Andrew Darlington.

14. **John/Jane Does 2-10:** As yet unknown individuals, including Russian hackers alleged to have compromised election systems and facilitated fraud in the 2016 and 2024 elections.

IV. NON-PARTY NECESSARY WITNESSES AND/OR INTERESTED PARTIES

15. **John Siamas:** Former candidate for the Florida State Senate District 21 who filed a lawsuit in Florida Circuit Court, Leon County, **Case No. 2024-CA-001457**, exposing fraudulent activity within VR Systems' software and systemic failures in voter record management and a total breakdown in internal controls within the Pinellas County Supervisor of Elections office and the State Division of Elections.

16. **Jeffrey Buongiorno:** Candidate for Palm Beach County Supervisor of Elections running against Defendant Link, and the plaintiff in **Case No. 9:24-CV-80920-AMC** in U.S. District Court for the Southern District of Florida, alleging widespread vote-by-mail fraud.

17. **Chris Gleason:** Candidate for Pinellas County Supervisor of Elections running against Defendant Marcus and the plaintiff in **Case No. 24-003717-CI**, exposing fraudulent vote-by-mail ballot order data manipulation and unlawful ballot issuance practices in Pinellas County.

18. **Samuel Thompson:** Candidate for Clerk of the Circuit Court and Comptroller in Palm Beach County, and the plaintiff in **Case No. 50-2024-CA-011346**, highlighting voter ID verification failures, fraudulent ballot issuance, and systemic data tampering.

V. FACTUAL ALLEGATIONS

A. Evidence from the Reality Winner leaked NSA report and DOJ Indictments against Russian GRU Hackers that Breached VR Systems in 2016 to Get Trump elected.

19. The top-secret NSA report leaked to The Intercept by NSA whistleblower Reality Winner in 2017¹ revealed that Russian GRU operatives successfully hacked VR Systems' software and employee administrator accounts during the 2016 election in an effort to get Donald Trump elected president. It began with spearphishing campaigns that targeted VR Systems employees and their admin

¹ EXHIBIT A: *Report: The NSA Knew Russia Hacked a U.S. Voting Software Supplier Before the Election. What Now?*, The Intercept, June 6, 2027; <https://www.gq.com/story/the-intercept-russia-hack-report>

accounts. This was confirmed in the Robert Mueller DOJ indictment of 12 Russian GRU hackers.²

20. The compromised systems were used to manipulate voter registration data and facilitate election fraud during the 2016 Presidential Election. This was not limited to just Florida, but several other states that used VR Systems election software.

21. Page 26, Paragraph 76 in the Mueller Indictment reads as follows:

“76. In or around November 2016 and prior to the 2016 U.S. presidential election, KOVALEV and his co-conspirators used an email account designed to look like a Vendor 1 email address to send over 100 spearphishing emails to organizations and personnel involved in administering elections in numerous Florida counties. The spearphishing emails contained malware that the Conspirators embedded into Word documents bearing Vendor 1’s logo.”

22. Eight years later, evidence uncovered during the 2024 primary and general elections by Plaintiff and 4 other candidates demonstrates a more sophisticated cyberattack that exploited vulnerabilities in VR Systems Voter Focus vote-by-mail (VBM) ballot ordering software, and VR Systems production servers running that software, in several Florida counties (and possibly across 7 other states such as Georgia, North Carolina, and Texas).

² **EXHIBIT B:** The Robert Mueller DOJ Unsealed Indictment of Russian GRU Hackers, *United States of America v. Viktor Borisovich Netyksho, et al*, 1:18-cr-00215-ABJ, filed July 13, 2018.

23. A massive number of fraudulent VBM orders missing voter ID information (SSAN-last 4 and driver's license numbers) on June 23 and June 26 of 2024 were submitted to Pinellas and Miami-Dade counties' Supervisors of Elections over the Internet. The hackers manipulated voter registration data, and then they retroactively tampered with and modified (on September 9, 2024) the historical record of those VBM ballot orders that had been submitted on June 23rd in Pinellas County.

24. The VBM ballot fraud was large enough to alter the outcome of Plaintiff's primary election on August 20th, the elections in other Pinellas county primary races, and in the general election races on November 5th, 2024. This includes potentially the re-election of Donald Trump, the re-election of Congresswoman Anna Paulina Luna, and the elections of others such as: (1) FL Senate candidate Edward Hooper; (2) Defendant Julie Marcus (Pinellas Supervisor of Elections); (3) Defendant Wendy Link (Palm Beach Supervisor of Elections), and Adam Anderson (District 57 FL House).

25. In the most recent act in furtherance of this election fraud conspiracy, on December 2, 2024, Defendant Jane Doe 1, a Florida lawyer and social advocate with ties to the Ron DeSantis administration, arranged and hosted a Zoom videoconference meeting involving Defendant Andrew Darlington and John Siamas (a former Florida State Senate candidate who allegedly lost to Edward

Hooper in the August 20th primary)who is an interested party and necessary witness in this case.

26. The meeting was hosted on Jane Doe 1's Zoom account, bypassing official state communication channels to avoid transparency and oversight, and to leave no trace of the on-line meeting on any public record.

27. During the meeting, Darlington requested Siamas' data regarding the aforementioned vote-by-mail (VBM) ballot anomalies, including the unexplained massive spikes in VBM requests in Pinellas and Miami-Dade counties on June 23rd and 26th which had Social Security and driver's license numbers labeled as non-existent in over 80 percent of VBM ballot requests, as was shown in FL state election records.

28. Siamas expressed concerns as to why Darlington, as Director of the Florida Election Crimes and Security Division and the chief election crimes law enforcement officer in Florida, was asking *him* to provide Darlington the State's own VBM ballot ordering data the State itself had published.

29. Jane Doe 1's role was to broker and facilitate the Zoom meeting, as she, not Darlington or anyone from his office, had made the initial outreach to Siamas, where should would drop Darlington's name as an enticement.

30. Siamas later described the meeting to Plaintiff as a thinly disguised attempt to assess the strength of his election fraud case against Darlington's bosses such as

Florida Secretary of State Cory Byrd and Governor Ron DeSantis and other State and county elections officials.

31. Plaintiff alleges that this Zoom conference, convened at the request of Defendant Darlington through his proxy Jane Doe 1, represents the latest act in furtherance of this election fraud conspiracy to conceal election fraud exposed in Siamas' and Plaintiff's and other candidates' lawsuits, and to obstruct what legitimately should be a criminal election fraud investigation by Defendants Darlington and Byrd in their official administration and law enforcement duties.

Death Threat and Coercion Against Plaintiff to Drop Lawsuits

32. On November 15, 2024, Plaintiff received a disturbing email titled "GoneGetGaetz," threatening him to abandon his lawsuits and stop political activities against Donald Trump, Anna Luna, Matt Gaetz, and Lauren Boebert, or face harm, ruin, or expulsion from the country. The email stated that Plaintiff was on a hit list being developed by the incoming Trump administration.³

33. The sender used a "burner" one-time use email account *gonegetgaetz@proton.me*, which was deleted before Plaintiff could respond.

Evidence of Unlawful Vote-by-Mail Ballot Requests on a Massive Scale

34. On June 23, 2024, over 219,000 VBM requests were processed in Pinellas County by VR Systems' Voter Focus production servers hosted on behalf of the

³ **EXHIBIT C:** Threatening "GoneGetGaetz" email threat/warning to John Liccione, 11/15/24.

Pinellas County Supervisor of Elections under the domain name

pinellas.electionsfl.org.⁴

35. Ninety-six point eight percent (96.8%) were recorded as lacking required voter identification (SSAN last 4 and/or driver's license number). It is noted that Plaintiff ordered his own vote-by-mail ballot in September of 2024 and the VBM ballot request form cannot even be submitted unless at least one of the SSAN/Driver's License fields are filled in.

36. Deceased Voters: VBM ballots were requested for deceased individuals.

37. Systemic Internal Control Failures: VR System's Voter Focus software used in Florida counties permitted administrators, or hackers using hacked administrator accounts, to turn off fraud detection features, and to wipe or modify the records, facilitating fraudulent VMB ballot orders, the down-stream counting of fraudulently marked blank ballots mailed to the fraudsters, and the after-the-fact obstruction by State and County-level election officials to conceal the evidence.

Evidence from the Thompson Lawsuit

38. Palm Beach County Irregularities: Of 292,292 VBM requests, 19,649 lacked identification. Fraud detection systems were overridden, allowing issuance of these requests.

⁴ **EXHIBIT D:** Screenshots of Liccione Wireshark packet capture recorded during his VBM request session with the Pinellas Supervisor of Elections website (VR Systems Voter Focus) on September 27, 2024, showing DNS resolution to domain pinellas.flelections.org and other metadata.

39. Manual Overrides: After discrepancies were exposed by Plaintiff and the other named candidates in their lawsuits, VBM count records were fraudulently altered retroactively to appear compliant with statutory requirements.

Russian Hacking/Foreign Interference

40. Forensic analysis identified cyber intrusion consistent with Russian GRU hacking operations targeting VR Systems during the 2016 election to get Trump elected. Similar or more sophisticated tactics were employed in 2024, generated fraudulent batch VBM orders with absent mandatory voter identification, manipulation of voter rolls - once again to the benefit of Donald Trump and this time, Anna Paulina Luna, Edward Hooper, Julie Marcus, Wendy Link, Adam Anderson, and other victorious candidates.

Fraudulent Concealment of IP Addresses of VBM Ballot Requesters on June 23, 2024

41. On August 30, 2024, Plaintiff submitted a very narrowly focused public records request as CEO of **The Crabber News** (Request no. 2024-392) to the Pinellas Supervisor of Elections⁵ requesting the IP addresses and timestamps of all VBM ballot requests submitted on Sunday June 23, 2024, as follows:

*“A .csv file or excel spreadsheet report showing **the source IP address of each and every individual who submitted an absentee ballot request to the Pinellas Supervisor of Elections over the Internet on June 23,***

⁵ **EXHIBIT E** – Email thread of Liccione public records request for IP addresses of VBM ballot requests on June 23, 2024, and PSOE General Counsel Matt Smith’s responses.

2024. The report need not provide any personally identifiable information, just the following 2 columns: (1) Date/Time of submission; (2) Source IP Address of submitter. It is noted that this type of metadata is typically available as a cybersecurity standard practice in web server logs, firewall logs, cloud service provider (e.g., Cloudflare) reports, and other off-the-shelf IT logging and reporting systems. It would typically take an IT person with proper access credentials less than 30 minutes to generate it and export it to a csv or Excel file."

42. After 18 days of silence PCSOE General Council Matt Smith replied via email and gave this one-sentence, completely non-responsive response: "***We have no records responsive to your request.***"

43. Plaintiff requested an in-person meeting with Smith and others at the PCSOE to discuss the matter. Smith refused, citing Plaintiff's pending litigation against the PCSOE and referring Plaintiff to litigation counsel.

44. On September 3 2024, after the election results were certified by the State of Florida and the PCSOE, Plaintiff filed his related State lawsuit against Julie Marcus, et al in Florida's 6th Circuit Court: Case no. 24-003939-CI.

45. On September 12 2024, Plaintiff Liccione served the Case 24-003939-CI summons, the 1st Amended Complaint, and his 1st Request for Production of Documents on Defendant Julie Marcus. He he demanded production of the June 23rd VBM requestor IP addresses and timestamps (and added related voter and cybersecurity forensic metadata to the request.⁶

⁶ **EXHIBIT F:** Plaintiff's Request for Production of IP Addresses of VBM Ballot requestors in Case no. 24-003939-CI.

Violation of Discovery Rules, The FL Public Records Act, Fraudulent Concealment, Obstruction

46. On October 22, 2024, Defendant Marcus' attorney, Kirby Kreider, requested an extension of the discovery deadline, claiming that the requested records were held by an unidentified external contractor and would require an additional time to retrieve.

47. During this discussion, Kreider refused to confirm, when pressed by Plaintiff, whether the contractor retained the requested records or could produce them, suggesting a deliberate effort to delay and obstruct the discovery process.

48. Plaintiff provided Defendant Marcus' counsel with evidence, including excerpts from the Voter Focus on-line user manual, demonstrating that the Voter Focus software records, stores, retains, and performs fraud detection based on the IP addresses used by mail ballot requestors, and that the fraud detection feature can be disabled by Voter Focus administrators.⁷ Despite this, Defendant's counsel denied knowledge of these capabilities and failed to provide assurances that the records would be produced even within another 45 days.

49. Plaintiff filed a 12-page Motion to Compel Discovery of the IP Address records against Defendant Marcus in 24-003939-CI on October 28, 2024.⁸

⁷ **EXHIBIT G:** Liccione email to Attorney Kirby Kreider with Voter Focus User's manual pages proving IP Address record retention for VBM ballot orders and fraud detection.

⁸ **EXHIBIT H:** Liccione Motion to Compel Discovery of IP Address Records against Julie Marcus in FL case 24-003939-CI.

50. To date, Defendant Marcus and her attorneys have continued to stonewall in the State case until, on October 20, 2024, the FL 6th Circuit Court presiding judge Patricia Muscarella, issued an order staying proceedings, including stay of discovery, until after a final judgement is entered in this federal case, which won't get to trial until at least January 2026.

51. Plaintiff alleges that Defendant Marcus and her attorneys, including Matt Smith, Kirby Kreider, and Andrew Keefe, acting at the direction of Governor Ron DeSantis, Secretary of State Cory Byrd and Division of Elections Director Maria Mathews, and Election Crimes and Security Director Andrew Darlington, are actively concealing the existence of critical records that would identify the source of the fraudulent 219,000+ mail ballot requests received on June 23, 2024.

52. Defendants Marcus and Smith's refusal to produce these records, and even, in Smith's case, to claim the records don't even exist when it is obvious they do exist, constitutes a violation of both the Florida Public Records Act and the Florida rules of discovery, and it further supports allegations of a post-election cover-up by way of fraudulent concealment and obstruction of justice.

53. Plaintiff alleges that the Defendants have acted in concert to obstruct justice by denying access to public records and discovery materials critical to Plaintiff's claims of election fraud.

54. On September 9, 2024, the State of Florida's vote-by-mail request file made downloadable to candidates by the State, then reflected that 198,259 mail ballot requests were received in a single day under the general election's ID number.

This serves to extend the appearance of election fraud out to the general election.

55. Plaintiff has presented evidence that the Voter Focus software includes fraud detection features that capture and analyze the IP addresses of mail ballot requestors and flags potential fraud for investigation in its "fraud case management system." The refusal to produce these records hinders the investigation and discovery of potential foreign interference, including IP addresses linked to foreign entities, such as Russia, China, and Iran.

56. Defendants' actions have delayed Plaintiff's ability to substantiate his claims, deprived him of critical evidence, and represent a willful effort to impede the legal process.

Fraudulent Concealment

57. Plaintiff alleges that the failure to produce the IP addresses and related metadata and constitutes fraudulent concealment, as well as wire fraud, as Defendants are aware of the records' existence and their relevance to this case.

58. The retroactive adjustment of the June 23, 2024 mail ballot request count, which occurred in early September shortly after Plaintiff and others filed their

election fraud lawsuits, further evidences a concerted effort by Defendants to manipulate election records and obscure the truth regarding election irregularities.

59. Defendants' intentional withholding of these records violates their obligations under Florida law and the Rules of Civil Procedure, warranting judicial intervention to compel disclosure and address this misconduct.

The Wendy Link Public Declaration that she will never release the IP addresses of VMB Ballot Requestors During Sun Sentinel Debate

60. On September 5, 2024, during a recorded public debate with her opponent Jeff Buongiorno that was hosted by the Sun Sentinel's editorial board, Defendant Wendy Link declared that she would *never* release the IP addresses of VBM ballot requestors.

61. This declaration by Link can be seen as an admission of guilt and criminal intent, obstruction of justice, fraudulent concealment, and various election crimes.

62. On information and belief, Defendants Marcus and Link's marching orders are flowing down from Governor Ron DeSantis, through Secretary of State Byrd, and through the State Division of Elections Director Maria Matthews and Defendant Darlington, and then down to all of Florida's County supervisors of elections, as well as over to the CEO of VR Systems, Defendant Mindy Perkins.

63. The cumulative evidence from publicly available State records as disclosed in lawsuits and investigations reveals a coordinated effort involving a hostile foreign power, state and local election officials, and private individuals, with systemic

breaches of voter identification protocols, intentional failures to uphold election laws, and violation of Florida Public Records act and violation of the rules of discovery under color of law.

V. CLAIMS FOR RELIEF

COUNT I: Violation of 42 U.S.C. § 1983 – Deprivation of Civil Rights

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

64. **Against Defendants:** Ron DeSantis, Andrew Darlington, Cory Byrd, Julie Marcus, Matt Smith, Wendy Link, Jane Doe 1, and John/Jane Does 2-10.

65. **Conduct:** Defendants acted under color of state law to deprive Plaintiff of his constitutional rights, including the right to a fair election and equal protection under the law, by facilitating election fraud, obstructing investigations, and concealing evidence.

66. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** His vote was diluted and canceled by fraudulently ordered and cast vote-by-mail ballots and manipulated election results in both the primary and general elections.
- b. **A candidate:** His Congressional candidacy was undermined, depriving him of a fair electoral process, directly causing his loss.

- c. **A plaintiff:** Defendants' acts of obstruction hindered his ability to gather evidence and pursue legal redress, both before and after the election results were certified, resulting in financial and emotional harm.

COUNT II: Violation of Federal Election Laws (52 U.S.C. § 20511)

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

67. **Against Defendants:** Ron DeSantis, Cory Byrd, Julie Marcus, Matt Smith, Wendy Link, and Mindy Perkins.

68. **Conduct:** Defendants knowingly engaged in fraudulent activities, including the concealment of metadata and facilitation of fraudulent vote-by-mail requests, materially interfering with the integrity of federal elections.

69. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** His constitutional right to participate in an untainted election process was violated.
- b. **A candidate:** Fraudulent activity altered the election outcome, depriving him of fair competition.
- c. **A plaintiff:** His ability to substantiate claims of election fraud was obstructed, causing reputational and financial harm.

COUNT III: Conspiracy to Commit Election Fraud

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

70. **Against Defendants:** Ron DeSantis, Andrew Darlington, Cory Byrd, Julie Marcus, Matt Smith, Wendy Link, Mindy Perkins, Jane Doe 1, and John/Jane Does 2-10.

71. **Conduct:** Defendants conspired to commit election fraud by manipulating voter data, suppressing evidence, and retroactively altering records to conceal fraudulent vote-by-mail requests.

72. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** His vote was devalued by widespread fraud.
- b. **A candidate:** The conspiracy directly impacted the outcome of his election.
- c. **A plaintiff:** Plaintiff's ability to litigate was undermined through intentional concealment and obstruction.

COUNT IV: Violation of the Florida Public Records Act - Fla. Stat. § 119.01 (2024)

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

73. **Against Defendants:** Julie Marcus, Matt Smith, Wendy Link, and John/Jane Does 2-10.

74. **Conduct:** Defendants willfully failed to produce records, including metadata and IP addresses related to vote-by-mail requests, in violation of Florida's Public Records Act.

75. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** Denied transparency in the election process, undermining his confidence in democracy.
- b. **A candidate:** Lack of access to records concealed fraud that influenced the election.
- c. **A plaintiff:** Obstruction of public records delayed and hindered Plaintiff's ability to pursue legal remedies.

COUNT V: Fraudulent Concealment

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

76. **Against Defendants:** Julie Marcus, Matt Smith, Mindy Perkins, and John/Jane Does 2-10.

77. **Conduct:** Defendants concealed material facts, including metadata and vote-by-mail records, with the intent to obstruct investigations and deceive Plaintiff and the public.

78. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** Fraudulent concealment perpetuated election fraud, violating his rights.
- b. **A candidate:** Lack of transparency allowed fraud to affect the election outcome, harming his candidacy, and directly resulting in Plaintiff's defeat..
- c. **A plaintiff:** Concealment of evidence caused delays, additional costs, and emotional distress in pursuing legal action.

COUNT VI: Violation of the Computer Fraud and Abuse Act 18 U.S.C. § 1030 (CFAA)

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

79. **Against Defendants:** Mindy Perkins, Julie Marcus, Wendy Link, and John/Jane Does 2-10.

80. **Conduct:** Unauthorized access to protected election systems and metadata facilitated fraudulent vote-by-mail requests and voter record manipulation.

81. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** Cyber intrusions compromised election integrity and his participation in the process.
- b. **A candidate:** Manipulated records and fraud undermined his ability to compete fairly, directly resulting in Plaintiff's defeat.
- c. **A plaintiff:** Defendants' conduct caused delays and increased costs in obtaining critical forensic evidence.

COUNT VII: Violation of the Racketeer Influenced and Corrupt Organizations Act (RICO) (18 U.S.C. §§ 1961-1968)

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

82. **Against Defendants:** All defendants.

83. **Conduct:** Defendants engaged in a coordinated corrupt enterprise involving multiple criminal acts within the span of seven months in 2024 to include fraudulent vote-by-mail requests, obstruction of investigations, and retroactive alteration and destruction of electronic election records, wire fraud, violation of the Florida Public Records Act, constituting racketeering activity.

84. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** Systemic fraud diluted his vote and undermined democratic processes.

- b. **A candidate:** Racketeering activities distorted the election's outcome, depriving him of fair competition, directly resulting in Plaintiff's defeat.
- c. **A plaintiff:** Efforts to obstruct justice impeded his ability to prosecute claims and seek redress.

COUNT VIII: Obstruction of Justice Under 18 U.S.C. § 1503

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

85. **Against Defendants:** All Defendants.

86. **Conduct:** Defendants intentionally obstructed Plaintiff's judicial proceedings by refusing to produce evidence, retroactively altering records, and misrepresenting the existence of metadata and violating rules of civil procedure on discovery.

87. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** Denied accountability in the electoral process.
- b. **A candidate:** Obstruction concealed fraudulent activities that influenced the election outcome and resulted in Plaintiff's election defeat.

- c. **A plaintiff:** Obstruction caused significant delays in Plaintiff's judicial proceedings, financial loss, emotional distress, and inability to prosecute his claims.

COUNT IX: Intentional Infliction of Emotional Distress

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

88. **Against Defendants:** Ron DeSantis, Julie Marcus, Matt Smith, Jane Doe 1, and John/Jane Does 2-10.

89. **Conduct:** Defendants engaged in extreme and outrageous conduct, including death threats, suppression of Plaintiff's claims, and obstructive tactics, intending to cause severe emotional distress.

90. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** Emotional distress from threats and undermined confidence in democracy.
- b. **A candidate:** Threats and intimidation interfered with his campaign and placed him in fear for his life.
- c. **A plaintiff:** Psychological and emotional harm due to Defendants' malicious conduct.

COUNT X: Fraudulent Misrepresentation

Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

91. **Against Defendants:** Julie Marcus, Matt Smith, Mindy Perkins, Wendy Link, and John/Jane Does 2-10.

92. **Conduct:** Defendants knowingly misrepresented the existence of records and metadata pertaining to mail ballot order processing, to deceive Plaintiff, obstruct investigations, and delay litigation.

93. **Damages:** Plaintiff suffered harm as:

- a. **A voter:** Fraudulent misrepresentation perpetuated fraud in the election process.
- b. **A candidate:** Lack of transparency allowed election fraud to influence the outcome, directly resulting in Plaintiff's election defeat.
- c. **A plaintiff:** Deception delayed litigation, increased costs, and caused reputational harm.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Declare the actions of Defendants unconstitutional and unlawful.

- B. Grant injunctive relief to preserve election records and order production of requested records by Defendants Marcus, Link, Darlington, Byrd, and DeSantis.
- C. Award compensatory and punitive damages in an amount to be determined at trial.
- D. Award treble RICO damages, costs, attorneys' fees, and pre- and post-judgement interest.
- E. Order the invalidation of all unlawfully ordered, processed, voted, and counted VBM ballots in the August 20th FL Primary election in Plaintiff's congressional primary race, in the Anna Paulina Luna vs Whitney Fox general election congressional CD-13 race, and in the Florida presidential race, and the de-certification of each races election results.

VII. DEMAND FOR JURY TRIAL

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

Respectfully submitted,

/s/ John W. Liccione

John William Liccione, Pro Se
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443-698-8156
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IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.

Defendants.

TAB 2

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No. 8:24-cv-02005-SDM-NHA

RONALD DION DESANTIS, ET AL,

Defendants.

Related FL Supreme Court Case No. SC2025-0242

MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

COMES NOW, Plaintiff, JOHN WILLIAM LICCIONE, pro se, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, and respectfully moves this Court for leave to file a Second Amended Complaint in light of newly discovered evidence and further developments in Plaintiff's case, including material facts and evidence presented in a recent filing before the Supreme Court of Florida in Case No. SC2025-0242 (EXHIBIT A). In support thereof, Plaintiff states the following:

I. INTRODUCTION AND BACKGROUND

1. Plaintiff originally filed this action against Defendants for claims relating to election fraud, violations of constitutional rights, RICO violations, and unlawful conduct in connection with the administration of elections and in the State of Florida in a Federal Election.
2. On March 6, 2025, Plaintiff filed an Emergency Motion for Rehearing (EXHIBIT A), an Emergency Petition to Stay, and a Petition for Emergency Injunctive Relief with the Florida Supreme Court in Case No. SC2025-0242. This filing details newly uncovered evidence of systematic election fraud directly relevant to Plaintiff's 2024 federal action, election fraud, which is now occurring again in the exact same manner in 2025 in the March 11, 2025 municipal election in Pinellas County, an election in which Plaintiff is running for Mayor of Gulfport, Florida.
3. This new evidence, which pertains to Plaintiff's March 11, 2025, Gulfport Florida mayoral election in which he is once again a victim as both a candidate and a registered voter, demonstrates a continuation of the same fraudulent criminal scheme identified in Plaintiff's prior pleadings in this case.
4. Specifically, the evidence reveals that 411 vote-by-mail ballots were requested fraudulently in the name of Gulfport voters on Saturday, January

11, 2025, including the name of Plaintiff, utilizing voter information without required authentication, as part of a scheme targeting the integrity of the election process.

5. The newly discovered fraud scheme follows the same pattern as the previously documented 2024 election fraud conspiracy, wherein unauthorized vote-by-mail (VBM) ballot requests, referred to as “***No-No Ballot Requests***” were submitted en masse without proper voter identification credentials.

II. LEGAL STANDARD

5. Under Rule 15(a)(2) of the Federal Rules of Civil Procedure, leave to amend should be freely granted when justice so requires. Courts generally permit amendment unless there is undue delay, bad faith, repeated failure to cure deficiencies, undue prejudice to the opposing party, or futility. See *Foman v. Davis*, 371 U.S. 178 (1962).
6. Here, there is no undue delay or prejudice to defendants, as Plaintiff seeks to amend the complaint promptly upon discovering new evidence critical to the claims already before the Court.

III. BASIS FOR AMENDMENT

7. The Second Amended Complaint will incorporate newly discovered facts, including: (1) Fraudulent VBM requests filed on January 11, 2025, targeting 411 Gulfport voters including Plaintiff; (2) Unauthorized alterations of voter records on January 27, 2025 including Plaintiff's; (3) direct involvement of elections officials and systemic vulnerabilities exploited through VR Systems that are being up by the defendants; (4) Documentation of conflicts of interest among election officials and Florida and judges in the Florida 6th Circuit Court that are overseeing the March 11th election and are presiding over Plaintiff's Florida election fraud cases; (5) A criminal complaint and Gulfport Police Report GP-25-3378, supporting claims of election fraud; (6) Plaintiff's formal petition to the Florida State Attorney's Office and to the Florida Supreme court for a grand jury probe under Fla. Stat. § 104.43.
8. The proposed amendment will refine and expand existing claims under the Equal Protection and Due Process Clauses of the Fourteenth Amendment, the Voting Rights Act, and federal statutes prohibiting election fraud, interstate wire fraud, mail fraud, computer hacking, identity theft in furtherance of election fraud, and additional elements that serve as more predicates for a RICO criminal and civil conspiracy.

9. The proposed Amendment will also add as Defendants the following persons and legal entities based on their participation in the on-going RICO conspiracy:

- a. Florida Supervisors of Elections, Inc.
- b. Benjamin Gibson, currently counsel for Defendant VR Systems CEO Mindy Perkins and General Counsel for the Florida Republican Party
- c. Evan Powers, Chairman of the Florida Republican Party
- d. William Stafford, currently counsel for Defendants DeSantis, Byrd, and Darlington, and Special Counsel in the Office of the Florida Attorney General;
- e. US Senator from Florida and Former Florida Attorney General Ashley Moody
- f. KrisAnne Hall

10. Because this case is in the early stages of litigation, despite having been filed 7 months ago without a single interrogatory having been answered and without a single document having been produced by Defendants, allowing amendment will not result in undue delay or prejudice to Defendants but will instead ensure the Court has a complete record of all relevant facts.

IV. CONCLUSION

10. For the foregoing reasons, Plaintiff respectfully requests that this Court grant leave to file the Second Amended Complaint, incorporating new factual allegations and legal claims based on the recently uncovered evidence.

WHEREFORE, Plaintiff prays that this Court enter an order:

- A. Granting leave to file the Second Amended Complaint;
- B. Directing the Clerk to docket the Second Amended Complaint upon filing;
- C. Granting such further relief as this Court deems just and proper.

Dated: March 6, 2025

Respectfully submitted,

/s/ John W. Liccione
John W. Liccione, Pro Se
6800 Gulfport Blvd S., Ste 201-116
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jliccione@gmail.com
443-698-8156

LOCAL RULE 3.01(g) CERTIFICATION

I John Liccione, do hereby certify that I have conferred with opposing parties' counsels and that we were not able to come to any agreement on this motion for leave to file amended complaint. The conference occurred by way of phone calls with opposing counsel on March 6, 2025.

/s/ John W. Liccione

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of March 2025, a true and correct copy of the foregoing Motion for Leave to File Second Amended Complaint has been served upon all parties via the Court's electronic filing system.

/s/ John W. Liccione

John W. Liccione

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.

Defendants.

_____ /

TAB 3

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No. 8:24-cv-02005-SDM-NHA

RONALD DION DESANTIS, ET AL,

Defendants.

**NOTICE OF WITHDRAWAL OF MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

Plaintiff, John Liccione, pro se, hereby withdraws his Motion for Leave to File Second Amended Complaint (Doc. No. 83), filed on March 6, 2025, in light of newly developed factual circumstances. Plaintiff intends to file a new motion for leave to amend based on those developments.

Dated: April 19, 2025

Respectfully submitted,

/s/ John W. Liccione

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jliccione@gmail.com
443-698-8156

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of April 2025, a true and correct copy of the foregoing Notice of Withdrawal of Motion for Leave to Amend has been served upon all parties via the Court's electronic filing system.

/s/ John W. Liccione

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.

Defendants.

_____ /

TAB 4

**IN THE CIRCUIT COURT OF THE 6TH JUDICIAL CIRCUIT IN AND FOR
PINELLAS COUNTY, FLORIDA**

John William Liccione,
Plaintiff,

v.

Pinellas Democratic Executive Committee
Florida Democratic Party
Michael John Sherosky
Jennifer W Griffith,
Defendants.

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* **Case No.:**

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COMPLAINT FOR DAMAGES AND EMERGENCY INJUNCTIVE RELIEF

Plaintiff, John William Liccione, pro se, files this Complaint against Defendants, Michael Sherosky, Jennifer Griffith, the Pinellas Democratic Executive Committee (PDEC), and the Florida Democratic Party, and alleges:

I. JURISDICTION AND VENUE

1. This action is filed in the Circuit Court of the 6th Judicial Circuit in and for Pinellas County, Florida, as the amount in controversy exceeds \$15,000.
2. The events giving rise to this claim occurred in Pinellas County, Florida, thereby establishing venue and jurisdiction in this Court.

II. PARTIES

3. Plaintiff, John William Liccione, is a 64-year-old man residing in Pinellas County, Florida. Plaintiff is also a Democratic Congressional Candidate in Pinellas County's Congressional District 13.
4. Defendant Pinellas Democratic Executive Committee is an organization headquartered in Pinellas County, Florida, and may be served with process at Pinellas County Democratic Party 2250 1st Avenue North St. Petersburg, FL 33713.
5. Defendant Florida Democratic Party is the governing body for the Democratic Party in the state of Florida and may be served with process at its headquarters at 201 South Monroe Street, Suite 300 Tallahassee, FL 32301.
6. Defendant Michael Sherosky is an individual residing in Pinellas County, Florida. Defendant Sherosky is the Secretary of the Pinellas Democratic Executive Committee and may be served with process at 3415 Annette Ct, Clearwater, FL 33761.
7. Defendant Jennifer Griffith is an individual residing in Pinellas County, Florida. Defendant Griffith is the Chair of the Pinellas Democratic Executive Committee and may be served with process at 305 S Tessier Dr, St Pete Beach, FL 33706

III. FACTUAL ALLEGATIONS

8. Plaintiff is one of 5 Democratic qualified candidates recognized by the FEC and the State of Florida that are running for Florida's 13th District House seat in 2024.
9. Out of Plaintiff's four opponents, three are young-to-early-middle-age women, Sabrina Bousbar (27), and Whitney Fox (42), Liz Dahan (44), and the fourth is Mark Weinkrantz who is 67 years old.

10. Over the last year, it has become rather obvious to many Party insiders and to Plaintiff that Whitney Fox is the Democratic Party's favored candidate, whereas Plaintiff is perceived by the Party as being the biggest threat to Whitney Fox.
11. In its way, this can be seen as the equivalent of what the Democratic Party did to Bernie Sanders in the 2016 presidential election, only much worse.
12. There, the Party was secretly backing Hillary Clinton over Bernie Sanders which, arguably, was a strategy than ultimately handed Donald Trump a victory over Clinton after the Russians were called by Trump to hack Clinton's campaign emails and those of the DNC, thereby exposing the Democrat Party's "dirty laundry" to the electorate.
13. In this campaign, however, the Democratic Party has abandoned all caution and pretext and is doing the quiet part out loud to Plaintiff in this race. They've gone so far as to publicly defame him and deny him donations and equal promotional opportunities, and other wrongful acts as described herein.
14. This Party favoritism on behalf of candidate Fox resulted in her being able to raise over \$200,000 in her first few weeks of announcing her campaign, whereas Plaintiff's campaign donations would completely dry up to the extent that, for all intents and purposes, he is self-funding 99 percent of his campaign out of his own life savings.
15. The Democratic Primary election is on August 20, 2024.
16. Mail-in ballots are being mailed out to voters in District 13 on July 16, 2024.
17. Defendant Griffith notified Plaintiff via email on June 26, 2023, that she and the rest of the PDEC candidate vetting committee had failed him in his candidate vetting process, and that they wouldn't be recognizing him as a qualified candidate and would be denying

him all access to party resources, promotion, speaking engagements, and participation in candidate forums and debates. They did not give him a reason why.

18. In the vetting process, Defendants Griffith and the PDEC denied Plaintiff all due process.

They refused to accept any court records Plaintiff offered to provide which proved his exoneration or dismissal of past criminal charges in Maryland in 2017 and 2019, in two cases in which he had stood falsely accused by his ex-wife and her divorce attorneys and the State of Maryland.

19. After the notification of candidate rejection, the Defendants engaged in a conspiracy to interfere in a contested Democratic primary election by publicly and privately defaming Plaintiff as a man of moral turpitude. As a result of this conspiracy, his campaign donations dried up and he was dis-invited from Party caucus and club speaking engagements and candidate forums and debates.

20. This pattern of Defendants' wrongful acts would continue unabated for the ensuing six months, upon which time, Defendant Griffith escalated it into a public confrontation which included her snatching Plaintiff's campaign sign.

21. Now, this conspiracy has escalated to political violence in the form of stalking and physical assault of Plaintiff by Defendant Sherosky, as describe in more detail below.

22. On June 22, 2024, during the St. Petersburg Pride Parade, Plaintiff was lawfully present and participating in the parade activities.

23. Plaintiff is a male domestic violence survivor who suffers from PTSD, a recognized disability under the Americans with Disabilities Act (ADA).

24. Defendant Sherosky, without provocation, forcefully knocked off the hat Plaintiff was wearing, which prominently displayed a pride flag, and hurled insults at Plaintiff, calling him an "ass" and he confirmed when asked that he wanted to hit Plaintiff.
25. Immediately following this assault, Plaintiff began recording the interaction with his cell phone. The first recorded statements captured Defendant Sherosky admitting to calling Plaintiff an "ass" and confessing that he had lied when he had denied knocking the hat off.
26. Defendant Sherosky's aggressive actions continued as he followed Plaintiff, stalking him and invading his physical space. On camera, Defendant Sherosky's body came within five inches of Plaintiff's face, significantly intensifying the distress experienced by Plaintiff.
27. These actions occurred in front of children and several adult witnesses, adding to their egregiousness and potential for causing broader distress. Following this incident, Plaintiff filed a criminal complaint against Defendant Sherosky with the St. Petersburg Police Department, seeking his arrest and criminal prosecution. [Police Incident Number: 2024-022685].
28. At the next monthly PDEC membership meeting in June 2024, Plaintiff Sherosky bragged to another member of PDEC during the meeting set-up about how he had abused Plaintiff and he stated something to the effect that "He should have gotten a lot worse."
29. Defendants Griffith and the Pinellas Democratic Executive Committee, being in proximity to the assault incident and in positions of authority, were either aware of, condoned, or failed to intervene in the actions taken by Defendant Sherosky.

30. Also, to date, no disciplinary action has been brought against Defendant Sherosky by Defendant's Griffith, Defendant PDEC, or Defendant the Florida Democratic Party, and, in their inaction, they continue to condone and thus enable Plaintiff's physical abuser, thus inviting future physical assaults on Plaintiff were he to attend any PDEC events.
31. On a prior occasion, during a monthly meeting of the Pinellas Democratic Executive Committee at the St. Pete College Epicenter, Defendant Griffith personally snatched one of Plaintiff's campaign signs while Plaintiff was using the men's bathroom.
32. After Plaintiff returned and placed his campaign sign back where it had originally been, Defendant Griffith initiated a public confrontation in the hallway, verbally harassing Plaintiff and demanding that he remove his campaign sign.
33. Despite Plaintiff's attempts to de-escalate the situation, Defendant Griffith continued to harass and bully him, abusing her authority as Chair of the PDEC. These acts were performed in front of approximately many eye witnesses and was indicative of a pattern of harassment directed at Plaintiff by Defendant Griffith and the Defendant PDEC. Subsequent to this incident, Plaintiff filed for two separate injunctions against Defendant Griffith, in Pinellas County Circuit Courts [Case Numbers: 24-000679-FL and 24-000750], to prevent further harassment, stalking, threats, theft, and intimidation.
34. Plaintiff also filed an appeal and complaint to Nikki Fried, Chair of the Florida Democratic Party reporting these previous events and demanding removal from office of Jennifer Griffith and a reversal of her candidate vetting failure decision.
35. However, the Florida Democratic Party rejected Plaintiff's complaint on a technicality, thereby also acting in a manner which serves to condone the Party's defamation and

harassment campaign against Plaintiff, thereby enabling this latest act of violence against Plaintiff.

36. In November 2023, Defendant Griffith publicly defamed Plaintiff in an interview with the Tampa Bay Times, falsely claiming he was a man of moral turpitude.
37. Griffith further stated that the Committee did not recognize Plaintiff as a Democratic candidate.
38. As a result, Plaintiff has been systematically denied equal treatment in promotional and speaking opportunities at Party events and candidate forums.
39. Additionally, on information and belief, Defendants acted to blacklist Plaintiff with all Democratic Political Action Committees and other donors, which directly resulted in financial damages to Plaintiff estimated at over \$400,000 to date, and counting.
40. As a direct result of Griffith's disinformation and defamation campaign, the Tampa Bay Times published two defamatory articles about Plaintiff, which caused catastrophic damage to his campaign, his reputation, and his ability to raise campaign funds.
41. Defendant Griffith and others within PDEC have falsely claimed to third parties that Plaintiff is guilty of being a wife-beating stalker when Maryland court records prove he is not, video evidence proved his wife was lying to the police and the Courts, and he had been found not guilty in a 20-minute bench trial. Defendant's refused to accept any of these Maryland court records and denied him all due process in their candidate vetting process.
42. These patently false accusations by Defendants have been accepted as somehow true by some members of the PDEC, resulting in Plaintiff being systematically denied speaking engagements and participation in candidate forums alongside his four opponents further

marginalizing him within the political landscape and causing additional reputational and financial damages.

43. On June 18, 2024, as a result of Defendants' conspiratorial acts, a media company named "Florida Politics" published an article that failed to mention Plaintiff's name or his candidacy.
44. The article falsely claimed that one of his opponents, Whitney Fox, was the first to enter the race, while in truth, Plaintiff was the first to file to run on June 28, 2023. This falsehood further misled the public and damaged Plaintiff's opportunity to be recognized as a legitimate candidate.
45. As a direct result of the Defendants' conspiratorial acts and disinformation campaign led by Defendant Griffith, two other candidates, Sabrina Bousbar and Liz Dahan, have published candidate survey poll results that entirely omit Plaintiff's name from their poll bar charts, treating him as if he does not exist. This action directly harms Plaintiff's visibility among voters and further inhibits his ability to campaign effectively. It also runs afoul of Florida and Federal election statutes.
46. On information and belief, Defendants have conspired to coerce all 4 of Plaintiff's Democratic opponents to omit Plaintiff's name and polling results from all of their public communications so as to unduly influence voters' minds with willfully inaccurate polling results.
47. As of this date, there are now three mainstream media outlets, the Tampa Bay Times, Florida Politics, and Politico's Florida Playbook, that are willfully acting to suppress Liccione's campaign.

48. These outlets either omit Plaintiff's name from their articles as one of the five qualified candidates, or, they publish little or nothing about Liccione while highlighting the other candidates in their articles on the race. This systematic exclusion by major media outlets exacerbates the damage to Plaintiff's campaign and reputation, further influenced by the disinformation spread by Defendant Griffith and her associates within the PDEC.
49. The PDEC, Jennifer Griffith, and other Defendant's have most recently conspired to not extend an invitation to Plaintiff to attend a July 13, 2024 Candidate forum and are even now conspiring to prevent him from participating in it were he to show up at the event.
50. The PDEC website event calendar and the event description omit Plaintiff's name and photograph, only showing the names and photographs of his four opponents. This is especially damaging to Plaintiff at this critical moment in the primary because it is scheduled for the week that mail-in/absentee ballots are mailed out to District 13 voters in Pinellas County, and Democratic voters here tend to overwhelmingly prefer to vote by mail.
51. If not compelled via Court injunction to permit Plaintiff's participation in the candidate forum (which costs nothing to participate in for the other candidates) Plaintiff will have no choice but to invest significant campaign funds in a counter-event and peaceable assembly at or near the venue, so as to get at least some media attention and have his voice heard by voters in this critical week in the campaign.
52. Defendants engaged in a conspiracy to promote political violence and defame Plaintiff in an all-out-effort to undermine his congressional campaign, which has resulted in harm and damages to Plaintiff.

53. On information and belief, this was a premeditated act to provoke a violent response from Plaintiff that would have resulted in Plaintiff's arrest, executed at the direction of Defendant Griffith and other party operatives within the PDEC.
54. Defendants' actions were in violation of Florida Statutes Chapter 104 (Election Code: Violations; Penalties) and Federal election laws, specifically those designed to protect the rights of candidates to campaign without undue interference and intimidation.
55. The actions of the Defendants, which targeted Plaintiff on the basis of his sex, disability, and age, constitute violations of both Florida and Federal civil rights laws, including the Americans with Disabilities Act.
56. The Democratic primary election is scheduled for August 20, 2024. Plaintiff contends that as a direct result of the Defendants' wrongful and malicious acts, future damages will continue to mount, include the potential loss of the primary election, the potential loss in the general election on November 5, 2025, the personal loss of over \$250,000 of Plaintiff's personal life savings, and the loss of over \$10 million in campaign donations that he would have otherwise been able to raise, if not for the wrongful acts of Defendants.

IV. CAUSES OF ACTION

Count I – Battery (Against Defendant Sherosky)

57. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 56 as if fully set forth herein.

58. Defendant Sherosky intentionally and unlawfully touched Plaintiff against his will.

59. Defendant Sherosky's unauthorized and harmful touching directly and proximately caused damages to Plaintiff.

Count II – Assault (Against Defendant Sherosky)

60. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 56 as if fully set forth herein.

61. Defendant Sherosky intentionally acted in a threatening manner, causing Plaintiff to have a reasonable apprehension of imminent harmful contact.

62. As a result of Defendant Sherosky's conduct, Plaintiff suffered emotional distress.

Count III – Vicarious Liability (Against Defendants Griffith, the Pinellas Democratic Executive Committee, and the Florida Democratic Party)

63. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 56 as if fully set forth herein.

64. Defendants Griffith and the Pinellas Democratic Executive Committee and the Florida Democratic Party are liable for the actions of Defendant Sherosky, who acted within the

scope of his authority and under the apparent or actual oversight of the PDEC and the Florida Democratic Party.

Count IV – Conspiracy (Against All Defendants)

65. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 56 as if fully set forth herein.

66. Defendants collectively engaged in concerted action aimed at inciting political violence and defaming Plaintiff to disrupt his congressional campaign, to destroy his campaign fundraising ability, and to obstructing his efforts to campaign by snatching his campaign sign and other wrongful acts of election interference.

67. As a direct result of this conspiracy, Plaintiff suffered damages including emotional distress, and damage to his reputation and campaign, and personal financial damages.

Count V – Violation of Election Laws (Against All Defendants)

68. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 56 as if fully set forth herein.

69. Defendants' actions intended to impede Plaintiff's ability to campaign freely are in direct violation of Florida and Federal election laws, designed to ensure fair and free campaigning processes.

Count VI – Violation of Civil Rights (both Florida and State Laws) and the ADA (Against All Defendants)

70. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 56 as if fully set forth herein.

71. Defendants' actions that targeted and discriminated against Plaintiff on the basis of his disability (PTSD) which he suffers as a result of domestic violence against him, his sex violate the Americans with Disabilities Act (42 U.S.C. § 12101 et seq.) and the Florida Civil Rights Act (FCRA).

72. By their actions, Defendants have discriminated against Plaintiff in the activities of public life and engagement, including participation in political campaigning, on the basis of his disability, which is protected under the ADA.

73. Furthermore, Defendants' actions also constitute a violation of the Civil Rights Act of 1964, and Florida civil rights laws which prohibit discrimination on the basis of sex, age, and disability, including in instances where any program or activity is receiving Federal financial assistance directly or through in-kind donations from 3rd parties. In at least one instance, Defendant PDEC is hosting a Candidate forum on July 13, 2024 at the St Petersburg/Clearwater Marriott which is being moderated by an employee of a publicly funded media outlet that receives federal funding. Further, it is clear that both of the over-60-year-old males in the race are not the favored party candidates. Instead, the Chair of PDEC, defendant Jennifer Griffith, and the Chair of the Florida Democratic Party Nikki Fried, both being white women of a certain age themselves, are backing a white female candidate of a similar age as them, to the detriment of the two older men, both of whom are over 60.

74. Further, the Florida Civil Rights Act of 1992 (FCRA), Section 760.01-760.11, Prohibits discrimination based on race, sex, age, and handicap, amongst other protected classes.
75. Further, Florida's Public Employment; Age Discrimination, Section 112.044: Prohibits age discrimination in public employment. In this case, the wholly corrupted "candidate vetting process" undertaken by Defendants' Griffith and PDEC can be seen as the first stage of the "job candidate vetting process," where the hiring managers are the registered voters in Florida's District 13, and this is a "public office."
76. As a direct result of Defendants' discriminatory actions, Plaintiff has suffered emotional distress, harm to his reputation, and interference with his right to participate fully and equally in public life and the democratic political process.
77. Defendants are in violation of The Voting Rights Act of 1965: While primarily aimed at preventing racial discrimination in voting, this act also includes provisions that can impact campaign practices. For example, it outlaws tactics that may be used to intimidate or disenfranchise voters, which can indirectly affect campaign activities.
78. Defendants are in violation of 18 U.S. Code § 245 - Federally protected activities: This statute makes it a federal crime to interfere with federally protected activities, including voting in federal elections. It provides penalties for anyone "who uses force or threat of force to intimidate or interfere with a person's right to vote or campaign."
79. Defendants are in violation of 18 U.S. Code § 594 - Intimidation of voters: This statute prohibits any form of intimidation, threats, or coercion against voters to influence their voting behavior. This can include interference with campaign activities if the intent is to suppress or alter the outcome of an election.

80. 18 U.S. Code § 597 - Expenditures to influence voting: This statute makes it illegal to make expenditures to influence voting through bribery or other corrupt practices. In this case, Defendants engaged in the aforementioned corrupt and malicious practices which included making expenditures to promote the 4 other candidates in the primary race, and to portray Plaintiff as some kind of physical threat to Defendant Jennifer Griffith: She convinced the PDEC that they needed to hire a security guard for her personal protection against Plaintiff. Also, she convinced the PDEC to expend funds to hire a lawyer to provide a legal opinion regarding whether they could be held liable for damages by Plaintiff for their wrongful acts.

81. Florida Democratic and PDEC By-Law Violations - Finally, While Florida Democratic Party and PDEC by-laws prohibit choosing and promoting one candidate over another in a contested Democratic Primary, Defendant's Griffith and PDEC and the Florida Democratic Party have engaged in acts of commission and omission against Plaintiff that have denied him recognition, suppressed his campaign, denied him equal promotional opportunities with his opponents, denied him campaign donations, and omitted his name and picture alongside his four opponents on the PDEC website. Defendants have, constructively and literally by acts of both commission and omission, chosen their favored candidate in secret, are covering up that they have done so, are they are not even trying to cover up their wrongful acts against Plaintiff. This demonstrates consciousness of guilt by all Defendants.

VII. DAMAGES

82. Plaintiff demands judgment for compensatory damages in an amount to be determined at trial, plus court costs. Specific compensatory damages sought include financial losses due to being blacklisted with Democratic Political action committees and other donors, reputational damages, and emotional distress caused by the aforementioned systematic exclusion, defamation, and physical assault. Future damages may include the loss of the Democratic primary election, the potential loss in the general election, and the loss of significant campaign donations in excess of \$10 million that he would otherwise have raised, if not for the wrongful acts of the Defendants.

83. Plaintiff hereby also gives preliminary notice to the Court of his intent to seek punitive damages (if permitted the Court), as the Defendants' actions are believed to have been intentional, malicious, and undertaken in reckless disregard to the rights of the Plaintiff.

VIII. REQUEST FOR EMERGENCY INJUNCTIVE RELIEF

84. Plaintiff seeks emergency injunctive relief as follows:

- A. To enjoin all further acts of commission and omission by all Defendants that serve to suppress, interfere with, assault, stalk, harass, defame, slander, or otherwise act in any way to impede Plaintiff's Congressional campaign, including acts against Plaintiff himself and any and all of Plaintiff's campaign volunteers, staff, family, and friends.
- B. To enjoin all Defendants from further acts of commission and omission that serve to deny the voters the right to know that Plaintiff exists as a Federal Election Commission and Florida State-qualified Democratic Congressional Candidate.

- C. To enjoin all Defendants from impeding his ability to raise campaign funds from the donor community including Political Action Committees.
- D. To enjoin all Defendants from denying him equal participation with other candidates at Democratic Party events, including those held by Democratic Caucuses and Clubs in Pinellas County and elsewhere.
- E. To issue an injunctive order requiring the Defendants PDEC and the Florida Democratic Party to permit Plaintiff to participate equally in the July 13th Candidate Forum at the St Petersburg/Clearwater Marriott, and in subsequent candidate forums, and to place him equally alongside his 4 opponents on their website events page as well as on promotional communications and materials.
- F. To issue an injunctive order requiring that all Defendants afford Plaintiff equal speaking and promotional opportunities in PDEC and Florida Democratic Party communications including on its websites, its emailers, and the Mobilize service, and any other marketing communications channels in use by Defendants.
- G. To issue an injunctive order to Defendants PDEC and the Florida Democratic Party to immediately deliver to Plaintiff all campaign polling data now and in the future in the lead up to both the Democratic Primary and the general election in November.
- H. To enjoin Defendant Sherosky, Defendant Miller, and each and every officer of the Pinellas Democratic Executive Committee at large, and any agents acting on any of Defendants' behalf, from coming to within 100 feet of Plaintiff at any public campaign event or at his residence.

**IX. REQUEST FOR EMERGENCY EX PARTE HEARING ON EMERGENCY
INJUNCTIVE RELIEF**

Plaintiff seeks an emergency Ex Parte hearing on his request for (emergency) injunctive relief, as time is of the essence. The July 13, 2024 candidate form is only 9 days from now. The mail-in ballots will be mailed out to voters that week, and a majority of Democrats vote by mail in District 13. The primary is being held on August 20th, just 46 days from now.

X. DEMAND FOR JURY TRIAL

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

WHEREFORE, Plaintiff demands judgment against Defendants for damages, costs, injunctions against further discriminatory and election interference violations, punitive damages (assuming punitive damages are permitted), and any other relief the court deems just and proper.

Respectfully submitted,


John William Liccione, Plaintiff

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443-698-8156

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.

Defendants.

_____ /

TAB 5

**IN THE CIRCUIT COURT OF THE 6TH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA**

John William Liccione,
Plaintiff,

v.

Case No.: 24-002994-CI

Pinellas Democratic Executive Committee (PDEC);

Michael John Sherosky - in his official capacity
as Secretary of PDEC and in his personal capacity;

Jennifer W Griffith - in her official capacity
as Chair of PDEC and in her personal capacity;

Defendants.

FIRST AMENDED COMPLAINT

Plaintiff, John William Liccione, pro se, hereby files this First Amended Complaint against Defendants, the Pinellas Democratic Executive Committee (PDEC), Michael John Sherosky in his official capacity as Secretary of PDEC and in his personal capacity, and Jennifer Griffith in her official capacity as Chair of PDEC and in her personal capacity, and states in support as follows:

SUMMARY OF CHANGES

This Amended Complaint adds a new **Count VII: Defamation**, removes the Florida Democratic Party as a Defendant, and removes Plaintiff's request for injunctive relief. It also adds new relevant facts and allegations which occurred after the filing of the original Complaint on July 3, 2024.

I. JURISDICTION AND VENUE

1. This action is filed in the Circuit Court of the 6th Judicial Circuit in and for Pinellas County, Florida, as the amount in controversy exceeds \$15,000.
2. The events giving rise to this claim occurred in Pinellas County, Florida, thereby establishing venue and jurisdiction in this Court.

II. PARTIES

3. Plaintiff, John William Liccione, is a 64-year-old man and voter residing in Pinellas County, Florida. Plaintiff is a recent Democratic Congressional candidate in Pinellas County's Congressional District 13 and ran in the 2024 Democratic primary.
4. Defendant Pinellas Democratic Executive Committee (PDEC) is an organization headquartered in Pinellas County, Florida, and may be served with process at Pinellas County Democratic Party 2250 1st Avenue North St. Petersburg, FL 33713.
5. Defendant Michael Sherosky is an individual residing in Pinellas County, Florida. Defendant Sherosky is the Secretary of PDEC and may be served with process at 3415 Annette Ct, Clearwater, FL 33761.
6. Defendant Jennifer Griffith is an individual residing in Pinellas County, Florida. Defendant Griffith is the Chair of the PDEC and may be served with process at 305 S Tessier Dr, St Pete Beach, FL 33706

III. FACTUAL ALLEGATIONS

8. In early May of 2023, Plaintiff introduced himself to Defendant Griffith at his very first PDEC monthly meeting. He informed her of his intent to run for the Florida CD-13 House seat as a Democrat.
9. Griffith told Plaintiff that there were already several candidates who were intending to enter the race, and she told him that the Democratic Party did not wish to have a contested primary and she tried to discourage Plaintiff from running.
10. Sometime later that spring, Griffith informed Plaintiff for the first time that she and PDEC had adopted a new candidate vetting process. She sent him a candidate vetting form to fill out and return, which he did.
11. In his vetting form, Plaintiff disclosed that he had been arrested several times in Maryland and represented that he had been found not guilty at trial, and that charges were dismissed.
12. With his vetting form submittal Plaintiff also offered to provide Griffith with all the court records proving his exonerations in Maryland, but Griffith did not respond and would cut off all communications with Plaintiff regarding the vetting process.
13. Plaintiff was one of 5 Democratic qualified candidates recognized by the FEC and the State of Florida that ran in the 2024 Democratic Primary for Florida's 13th District House seat.

14. Out of Plaintiff's four opponents, three were young-to-early-middle-age women, Sabrina Bousbar (27), and Whitney Fox (42), Liz Dahan (44), and the fourth was Mark Weinkrantz who is 67 years old.
15. Democratic Party (PDEC, Griffith) favoritism on behalf of candidate Fox resulted in Fox being able to raise over \$200,000 in her first few weeks of announcing her campaign. Over the course of the primary election, Ms. Fox would raise a total of \$1,049,738 in campaign contributions.
16. In contrast, over the course of the primary campaign, Plaintiff received just under \$2,000 in donations from individuals, and zero donations from Democratic political action committees.
17. Plaintiff's campaign donations would completely dry up to the extent that he had to self-fund 99 percent of his campaign by loaning to it over \$272,000 out of his personal savings and via personal credit cards.
18. Mail-in ballots were mailed out to voters in Pinellas County beginning on or about July 16, 2024.
19. The Democratic Primary election was on August 20, 2024.
20. Plaintiff lost the primary election, garnering only 3.93 percent of the vote, whereas Whitney Fox won with 57.94 percent of the vote.
21. With his vetting form submittal Plaintiff also offered to provide Griffith with all the court records proving his exonerations in Maryland, but Griffith did not respond and would cut off all communications with Plaintiff regarding the vetting process.
22. Griffith notified Plaintiff via email on June 26, 2023, that she and the rest of the PDEC candidate vetting committee had failed him in his candidate vetting

process, and that they wouldn't be recognizing him as a qualified candidate and would be denying him all access to party resources, promotion, speaking engagements, and participation in candidate forums and debates. She did not give him a reason why.

23. In the vetting process, Defendants Griffith and the PDEC denied Plaintiff all due process. They refused to accept any court records Plaintiff offered to provide which proved his exoneration or dismissal of past criminal charges in Maryland in 2017 and 2019, in two cases in which he had stood falsely accused by his ex-wife and her divorce attorneys and the State of Maryland.

24. After the notification of candidate rejection, the Defendants engaged in a conspiracy to interfere in a contested Democratic primary election by publicly and privately defaming Plaintiff as a man of moral turpitude. As a result of this conspiracy, his campaign donations dried up and he was dis-invited from Party caucus and club speaking engagements and candidate forums and debates.

25. This pattern of Defendants' wrongful acts would continue unabated for the ensuing six months, upon which time, Defendant Griffith escalated it into a public confrontation on January 30, 2024, where she personally snatched Plaintiff's campaign sign in front of witnesses outside a PDEC meeting in the hallway St. Petersburg College Epicenter in Clearwater.

26. After Plaintiff replaced his sign Griffith then initiated a public confrontation in the hallway demanding he remove his campaign sign and prevented him from engaging with voters as he exited the PDEC meeting. She claimed that the College did not allow campaign signage inside the facility and she acted to

enforce of the state college policy, as if a state actor, by way of confrontation, harassment, and bullying.

27. After Plaintiff refused to remove his sign, Griffith escalated further by threatening Plaintiff that she would get a college security guard to remove his sign if he wouldn't remove it. Plaintiff refused to remove it.
28. Griffith then walked to the front lobby and brought back a security guard who refused to remove Plaintiff's campaign sign.
29. As a result of Griffith's campaign interference, Plaintiff lost the opportunity to engage with most of the voters leaving the PDEC meeting.
30. Next, Griffith and Sherosky in their official capacities as Chair and Secretary of PDEC, respectfully, and in their personal capacities, then conspired to escalated the dispute with Plaintiff by conspiring to engage in political violence, assault and battery, as detailed below.
31. On June 22, 2024, during the St. Petersburg Pride parade, Plaintiff was lawfully present and participating in the parade activities and was campaigning lawfully in the parade assembly area.
32. Plaintiff is a male domestic violence survivor who suffers from PTSD, a recognized disability under the Americans with Disabilities Act (ADA).
33. Defendants Griffith, Scherosky, and other members of PDEC were also participating in the Pride Parade. They had rented a parade truck.
34. As Plaintiff walked by the PDEC parade truck and was attempting to campaign and was about to begin introducing himself to the voters near the parade truck, Defendant Sherosky, without provocation, forcefully knocked off the hat Plaintiff was wearing, which prominently displayed a pride flag, and hurled insults at

Plaintiff, calling him an "ass", accused him of "harassing people, and he confirmed when asked that he wanted to hit Plaintiff.

35. Immediately following this battery, Plaintiff began recording the interaction with his cell phone. The first recorded statements captured Defendant Sherosky admitting to calling Plaintiff an "ass" and confessing that he had lied when he had denied knocking Plaintiff's hat off.

36. Defendant Sherosky's aggressive actions continued as he followed Plaintiff, stalking him and invading his physical space. On camera, Defendant Sherosky's body came within five inches of Plaintiff's face, significantly intensifying the distress experienced by Plaintiff.

37. These actions occurred in front of children and several adult witnesses, adding to their egregiousness and potential for causing broader distress. Following this incident, Plaintiff filed a criminal complaint against Defendant Sherosky with the St. Petersburg Police Department, seeking his arrest and criminal prosecution. [Police Incident Number: 2024-022685].

38. At the next monthly PDEC membership meeting in July 2024 held once again at the St. Petersburg College Epicenter in Clearwater, Plaintiff Sherosky bragged to another member of PDEC during the meeting set-up about how he had abused Plaintiff and he stated something to the effect that "He was lucky he didn't get worse."

39. Defendant Griffith being in proximity to the battery incident and in a position of authority as Chair of PDEC, was either aware of, condoned, and failed to intervene in the violent and harassing actions taken by Defendant Sherosky, and she failed to discipline Sherosky.

40. To date, no disciplinary action has been brought against Defendant Sherosky by Defendants Griffith or PDEC. In their inaction, they continue to condone and thus enable Plaintiff's physical abuser, thus inviting future physical assaults on Plaintiff were he to attend any future campaign events.
41. Plaintiff also filed an appeal and complaint to Nikki Fried, Chair of the Florida Democratic Party reporting these previous events and demanding removal from office of Jennifer Griffith and a reversal of her candidate vetting failure decision.
42. However, the Florida Democratic Party rejected Plaintiff's complaint on a technicality.
43. In November 2023, Defendant Griffith publicly defamed Plaintiff in an interview with the Tampa Bay Times, falsely claiming he was a man of moral turpitude, a statement which the Times published and attributed to Griffith.
44. Griffith further stated that the Committee did not recognize Plaintiff as a Democratic candidate.
45. As a result, Plaintiff was been systematically denied equal treatment in promotional and speaking opportunities at Party events and candidate forums, and was subjected to further defamatory attacks, campaign interference, and voter coercion and intimidation to prevent voters from attending Plaintiff's campaign events.
46. Additionally, on information and belief, Defendants acted to blacklist Plaintiff with all Democratic Political Action Committees and other donors, which directly resulted in financial damages to Plaintiff estimated at over \$400,000.
47. As a direct result of Griffith's disinformation and defamation campaign, the Tampa Bay Times published a total of two defamatory articles about Plaintiff,

which caused catastrophic damage to his campaign, his reputation, his ability to raise campaign funds, and his ability to come off disability and return to work in his field of cyber-security executive.

48. Defendant Griffith and others within PDEC have falsely claimed to third parties that Plaintiff is guilty of being a wife-beating stalker when Maryland court records prove he is not. Video evidence proved his wife was lying to the police and the Courts, and he had been found not guilty in a 20-minute bench trial.
49. These patently false accusations by all three Defendants have been accepted as somehow true by the voters and PDEC members, resulting in Plaintiff being systematically denied speaking engagements and participation in candidate forums alongside his four opponents, further marginalizing him within the political landscape and causing additional reputational and financial damages.
50. On information and belief, Defendants have conspired to coerce all 4 of Plaintiff's Democratic opponents to omit Plaintiff's name and polling results from all of their public communications so as to unduly influence voters' minds with willfully inaccurate polling results.
51. All totaled, as a result of Griffith and PDECs defamation and disinformation campaign, there were a total of four mainstream media outlets, the Tampa Bay Times, Florida Politics, Politico's Florida Playbook, and The Gabber Newspaper that took Griffith's lead and willfully acted to suppress Plaintiff by relay Griffith's disinformation about Plaintiff campaign and by even outright excluding Plaintiff from even being mentioned as a candidate.
52. These outlets either omit Plaintiff's name from their articles as one of the five qualified candidates, or, they publish little or nothing about Liccione while

highlighting the other candidates in their articles on the race. This systematic exclusion by major media outlets exacerbated the damage to Plaintiff's campaign and reputation, further influenced by the disinformation spread by Defendant Griffith and her associates within the PDEC.

53. Defendants engaged in a conspiracy to promote political violence and defame Plaintiff in an all-out-effort to undermine his congressional campaign, which has resulted in harm and damage to Plaintiff.

54. On information and belief, this was a premeditated act to provoke a violent response from Plaintiff that would have resulted in Plaintiff's arrest, executed at the direction of Defendant Griffith and other party operatives within the PDEC.

55. Defendants' actions were in violation of Florida Statutes Chapter 104 (Election Code: Violations; Penalties) and Federal election laws, specifically those designed to protect the rights of candidates to campaign without undue interference and intimidation.

56. The actions of the Defendants, which targeted Plaintiff on the basis of his sex, disability, and age, constitute violations of both Florida and Federal civil rights laws, including the Americans with Disabilities Act.

IV. CAUSES OF ACTION

Count I – Battery (Against Defendant Sherosky)

57. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 8 through 56 as if fully set forth herein.

58. Defendant Sherosky intentionally and unlawfully touched Plaintiff against his will.

59. Defendant Sherosky's unauthorized and harmful touching directly and proximately caused damages to Plaintiff.

Count II – Assault (Against Defendant Sherosky)

60. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 8 through 56 as if fully set forth herein.

61. Defendant Sherosky intentionally acted in a threatening manner, causing Plaintiff to have a reasonable apprehension of imminent harmful contact.

62. As a result of Defendant Sherosky's conduct, Plaintiff suffered emotional distress.

Count III – Vicarious Liability (Against Defendants Griffith, the Pinellas Democratic Executive Committee)

63. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 8 through 56 as if fully set forth herein.

64. Defendants Griffith and the Pinellas Democratic Executive Committee are liable for the actions of Defendant Sherosky, who acted within the scope of his authority and under the apparent or actual oversight of the PDEC and the Florida Democratic Party.

Count IV – Conspiracy (Against All Defendants)

65. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 56 as if fully set forth herein.

66. Defendants collectively engaged in concerted action aimed at inciting political violence and defaming Plaintiff to disrupt his congressional campaign, to destroy his campaign fundraising ability, and to obstruct his efforts to campaign by snatching his campaign sign, harassing him, by preventing voters from speaking with him and attending his campaign events, and other wrongful acts of election interference.

67. As a direct result of this conspiracy, Plaintiff suffered damages including emotional distress, and damage to his reputation and campaign, and personal financial damages, and the loss of his Congressional primary race.

Count V – Violation of Election Laws (Against All Defendants)

68. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 8 through 56 as if fully set forth herein.

69. Defendants' actions intended to impede Plaintiff's ability to campaign freely are in direct violation of Florida and Federal election laws, designed to ensure fair and free campaigning processes.

70. As a direct result, suffered damages to include the loss of his primary election, and financial damages in excess of over \$1,000,000 in lost donations and over \$250,000 in costs to self-fund his campaign.

Count VI – Violation of Civil Rights (both Florida and Federal Laws) including the ADA And the Civil Rights Act (All Defendants)

71. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 8 through 56 as if fully set forth herein.

72. Defendants' actions that targeted and discriminated against Plaintiff on the basis of his disability (PTSD) which he suffers as a result of domestic violence against him, his sex violate the Americans with Disabilities Act (42 U.S.C. § 12101 et seq.) and the Florida Civil Rights Act (FCRA).
73. By their actions, Defendants have discriminated against Plaintiff in the activities of public life and engagement, including participation in political campaigning, on the basis of his disability, which is protected under the ADA.
74. Furthermore, Defendants' actions also constitute a violation of the Civil Rights Act of 1964, and Florida civil rights laws which prohibit discrimination on the basis of sex, age, and disability, including in instances where any program or activity is receiving Federal financial assistance directly or through in-kind donations from 3rd parties. In at least one instance, Defendant PDEC is hosted a Candidate forum on July 13, 2024 at the St Petersburg/Clearwater Marriott which was moderated by an employee of a publicly funded media outlet that receives federal funding. The Pinellas County Supervisor of Elections coupled with the Florida Department of States operates the Pinellas Democratic primary election using taxpayer dollars. Further, it is clear that both of the over-60-year-old males in the race are not the favored party candidates. Instead, the Chair of PDEC, defendant Jennifer Griffith, are backing a white female candidate of a similar age as them, to the detriment of the two older men, both of whom are over 60.
75. Further, the Florida Civil Rights Act of 1992 (FCRA), Section 760.01-760.11, Prohibits discrimination based on race, sex, age, and handicap, amongst other protected classes.

76. Further, Florida's Public Employment; Age Discrimination, Section 112.044: Prohibits age discrimination in public employment. In this case, the wholly corrupted "candidate vetting process" undertaken by Defendants' Griffith and PDEC can be seen as the first stage of the "job candidate vetting process," where the hiring managers are the registered voters in Florida's District 13, and this is a "public office."
77. As a direct result of Defendants' discriminatory actions, Plaintiff has suffered emotional distress, harm to his reputation, and interference with his right to participate fully and equally in public life and the democratic political process.
78. Defendants are in violation of The Voting Rights Act of 1965: While primarily aimed at preventing racial discrimination in voting, this act also includes provisions that can impact campaign practices. For example, it outlaws tactics that may be used to intimidate or disenfranchise voters, which can indirectly affect campaign activities.
79. Defendants are in violation of 18 U.S. Code § 245 - Federally protected activities: This statute makes it a federal crime to interfere with federally protected activities, including voting in federal elections. It provides penalties for anyone "who uses force or threat of force to intimidate or interfere with a person's right to vote or campaign."
80. Defendants are in violation of 18 U.S. Code § 594 - Intimidation of voters: This statute prohibits any form of intimidation, threats, or coercion against voters to influence their voting behavior. This can include interference with campaign activities if the intent is to suppress or alter the outcome of an election.

81. 18 U.S. Code § 597 - Expenditures to influence voting: This statute makes it illegal to make expenditures to influence voting through bribery or other corrupt practices. In this case, Defendants engaged in the aforementioned corrupt and malicious practices which included making expenditures to promote the 4 other candidates in the primary race, and to portray Plaintiff as some kind of physical threat to Defendant Jennifer Griffith: She convinced the PDEC that they needed to hire a security guard for her personal protection against Plaintiff. Also, she convinced the PDEC to expend funds to hire a lawyer to provide a legal opinion regarding whether they could be held liable for damages by Plaintiff for their wrongful acts.

Count VII – Defamation (All Defendants)

82. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 8 through 56 as if fully set forth herein.

83. Defendant Jennifer Griffith, acting in her role as Chair of PDEC as well as in her personal capacity, made numerous false and defamatory statements to third parties over the course of Plaintiff's 15-month Congressional primary election, statements that she knew were false and that were made with reckless disregard for the truth.

84. Specifically, Defendant Griffith, in coordination with others in the PDEC falsely and publicly claimed that Plaintiff was a person of moral turpitude, a wife-beating stalker, unfit to be a Democratic candidate, and a physical threat to her and others when he was not. She made false, defamatory statements to the

Tampa Bay Times and other media outlets, which caused the publication of defamatory articles against Plaintiff.

85. Griffith's statements were per se defamatory and as such, Plaintiff is not required to prove special damages.

86. These defamatory statements were made with actual malice, with full knowledge of their falsity, and with a reckless disregard for the truth.

87. Defendants' defamatory statements caused severe damage to Plaintiff's Congressional campaign, including his loss in the primary election, to his reputation, personal humiliation, emotional distress, financial harm including the loss of campaign donations, lost of opportunities to speak at various campaign venues.

88. The financial damage to Plaintiff due to Griffith's defamation continues to mount post-election as the damage to his reputation directly caused by Defendant Griffith as it has severely affected his job prospects as he attempts to re-enter the workforce, come off disability, and land a job in his field of cyber-security executive.

89. As a direct and proximate result of Defendants' malicious defamation and reckless disregard for the truth, Plaintiff has suffered substantial reputational damage, loss of income, loss of campaign donations, and other damages in an amount to be determined at trial.

VIII. Damages

90. Plaintiff demands judgment for compensatory damages in an amount to be determined at trial, plus court costs. Specific compensatory damages sought

include financial losses due to being blacklisted with Democratic Political action committees and other donors, reputational damages, self-funded campaign expenses of over \$250,000, and emotional distress caused by the systematic exclusion, defamation, and physical assault and battery. Plaintiff lost the Democratic primary election as a direct result of Defendants' wrongful acts. Plaintiff suffered over \$1.1 million in damages in lost campaign donations that he would have otherwise reasonably received, if not for the wrongful and tortious acts of the Defendants.

91. Plaintiff hereby also gives preliminary notice to the Court of his intent to seek punitive damages (if permitted by the Court), as the Defendants' actions are believed to have been intentional, malicious, and undertaken in reckless disregard to the truth and to the civil rights of the Plaintiff.

IX. DEMAND FOR JURY TRIAL

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

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory and special damages, costs, punitive damages (assuming punitive damages are permitted), and any other relief the court deems just and proper.

Respectfully submitted,



John William Liccione, Plaintiff

6800 Gulfport Blvd S.
South Pasadena, FL 33707
jliccione@gmail.com
443-698-8156

CERTIFICATE OF SERVICE

I, John William Liccione, Plaintiff, on this 7th day of November 2024, hereby certify that the forgoing Plaintiff's Response to Defendants' Motion to Dismiss were e-served on all defendants through their attorney George Thurlow via the Court's e-file and e-serve system.



John W. Liccione

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.

Defendants.

_____ /

TAB 6

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

JOHN WILLIAM LICCIONE,
Plaintiff,

v.

Case No. 24-002994-CI

PINELLAS DEMOCRATIC EXECUTIVE
COMMITTEE,
MICHAEL JOHN SHEROSKY,
JENNIFER W. GRIFFITH,
Defendants.

COMPANION WITH:
Case No. 24-003939-CI

**ORDER GRANTING DEFENDANTS' MOTIONS TO DISMISS PLAINTIFF'S
AMENDED COMPLAINTS**

THIS CAUSE, having come before the Court upon Defendants Pinellas Democratic Executive Committee, Michael John Sherosky, and Jennifer Griffith's Motion to Dismiss Amended Complaint (Doc #34 in Case No. 24-002994-CI, filed November 14, 2024) and Defendant Jennifer Griffith's Motion to Dismiss Amended Complaint (Doc #40 in Case No. 24-003939-CI, filed on October 2, 2024, and re-filed as part of Doc #45 in Case No. 24-002994-CI, pg. 103-115, on November 20, 2024), and this Court, having reviewed the memoranda and materials filed by counsel and Plaintiff *pro se*, and having heard arguments from Plaintiff *pro se* and counsel for Defendants, this Court hereby **ORDERS AND ADJUDGES** as follows:

Case No. 24-002994-CI: Defendants Pinellas Democratic Executive Committee, Michael John Sherosky, and Jennifer Griffith's Motion to Dismiss Amended Complaint (Doc #34 in Case No. 24-002994-CI, filed November 14, 2024)

1. This Court **DENIES** Defendants' Motion to Dismiss on Counts I and II as they pertain to Defendant Michael Sherosky, but will require Plaintiff to re-plead Counts I and II in any amended pleading. In such an amended pleading, Plaintiff shall provide specific allegations pertaining to damages.
2. This Court **GRANTS** Defendants' Motion to Dismiss, without prejudice, with leave to amend, on Counts III and IV.

3. This Court **GRANTS** Defendants' Motion to Dismiss on Count V pursuant to Fla. Stat. § 768.295.
4. This Court **GRANTS** Defendants' Motion to Dismiss on Counts VI and VII, without prejudice, with leave to amend.
5. This Court **GRANTS** Defendants' Motion to Dismiss on Count VIII with prejudice, as damages do not exist as an independently-pled count.

Case No. 24-003939-CI: Defendant Jennifer Griffith's Motion to Dismiss Amended Complaint

6. This Court **GRANTS** Defendant's Motion to Dismiss on all counts, without prejudice, with leave to amend. If Plaintiff opts to file an Amended Complaint, the Amended Complaint must make specific allegations supporting that he has a private right of action against the Defendant with sufficient allegations.

Plaintiff shall have until December 30, 2024 to file a Second Amended Complaint, if he so desires.

Counsel for the Defendants shall file their response to the Second Amended Complaint within twenty (20) days and make every effort to schedule a hearing on any Motion(s) either pending or filed in response to a Second Amended Complaint within 45-60 days of the Second Amended Complaint being filed. Should any or all of the Defendants move to dismiss a subsequently-filed Second Amended Complaint, the meet-and-confer requirement for such a Motion is waived.

[THIS SPACE IS INTENTIONALLY LEFT BLANK]

Nothing in this Order shall be construed as an adjudication of Defendants' legal or factual defenses, including the applicability of Fla. Stat. § 768.295, except as otherwise provided and Defendants' are permitted to raise these issues for adjudication by the Court in subsequent Motions.

Entered in Chambers, St. Petersburg, Pinellas County, Florida on this 20th day of

December, 2024.

A handwritten signature in black ink, appearing to read "Thomas Ramsberger", written over a horizontal line.

CIRCUIT COURT JUDGE

Thomas Ramsberger

Copies to:

-John William Liccione, Plaintiff *Pro Se*

-George A.D. Thurlow, Esquire, Counsel for Defendants

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.

Defendants.

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TAB 7

**IN THE CIRCUIT COURT IN AND FOR PINELLAS COUNTY
STATE OF FLORIDA, CIVIL DIVISION
CASE NO.: 24-002994-CI-19**

JOHN WILLIAM LICCIONE,
Plaintiff,
vs.

**PINELLAS DEMOCRATIC
EXECUTIVE COMMITTEE, ET AL,**
Defendants.

**AMENDED
ORDER TO SHOW CAUSE**

THIS CAUSE came before the Court for telephonic hearing on January 28, 2025, during which the Plaintiff, John William Liccione, disrupted the Court numerous times and, after being advised by the Judge to not disrupt the hearing, continued to disrupt the Court's business. The Plaintiff engaged in similar conduct during two prior telephonic hearings. The Court is hereby entering this Order to Show Cause for the Plaintiff to explain why the Court should not find the Plaintiff in direct criminal contempt pursuant to Fla. R. Crim. P. 3.830 for the Plaintiff's misconduct during the hearing. Therefore, it is hereby

ORDERED AND ADJUDGED as follows:

The Plaintiff, John William Liccione, is hereby **ordered to appear in person** before the Court on:

Date/Time: Thursday, April 10, 2025, at 11:45a.m.
Judge: Thomas Ramsberger, Circuit Judge
Location: St. Petersburg Judicial Building
545 1st Avenue North, 2nd Floor, Courtroom 2A
St. Petersburg, Florida 33701

The Plaintiff will at that time provide the Court with testimony as to why he should not be found in contempt. Should the Court find the Plaintiff in contempt, then the Court will set another hearing to determine if any sanctions will be imposed upon the Plaintiff, including but not limited to, incarceration for such contempt.

FAILURE OF JOHN WILLIAM LICCIONE TO APPEAR IN COURT AT THE SCHEDULED TIME MAY RESULT IN THE COURT ISSUING A WARRANT FOR HIS ARREST. IF ARRESTED, YOU MAY BE HELD IN JAIL UP TO FORTY-EIGHT (48) HOURS BEFORE A HEARING IS HELD.

DONE AND ORDERED at St. Petersburg, Pinellas County, Florida, on February ____, 2025.


24-002994-CI 2/11/2025 3:34:16 PM
Circuit Judge Thomas Ramsberger
24-002994-CI 2/11/2025 3:34:16 PM

Copies furnished via JAWS to:
John William Liccione, Plaintiff, Pro Se
George Thurlow, Counsel for Defendants

THOMAS RAMSBERGER
Circuit Judge

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.

Defendants.

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TAB 8

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

JOHN WILLIAM LICCIONE,
Plaintiff,

v.

Case No. 24-002994-CI

COMPANION WITH:

PINELLAS DEMOCRATIC EXECUTIVE
COMMITTEE,
MICHAEL JOHN SHEROSKY,
JENNIFER W. GRIFFITH,
Defendants.

Case No. 24-003939-CI

ORDER DISMISSING LAWSUIT

THIS CAUSE, having come before this Court on February 24, 2025 at a duly noticed Case Management Conference, and this Court, having heard argument from Plaintiff *Pro Se* and counsel for Defendants, and being otherwise fully and duly advised in its premises, the Court hereby finds as follows:

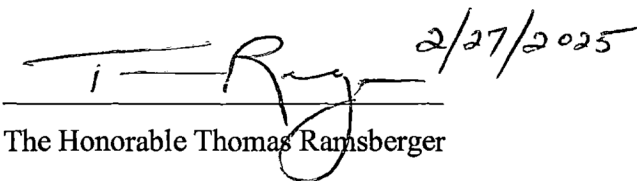
1. On December 20, 2024, this Court entered an Order (Doc # 64) requiring Plaintiff to replead Counts I and II in an amended pleading, if Plaintiff so desired, dismissing Counts III, IV, VI, and VII without prejudice, and dismissing Counts V and VIII with prejudice. The Order set a deadline of December 30, 2024 for Plaintiff to file an amended complaint.
2. The Plaintiff subsequently filed a Motion for Clarification of the December 20, 2024 Order (Doc # 64) on December 21, 2024 and a Motion for Extension of Time to File Second Amended Complaint (Doc # 65) on December 30, 2024. The Court held a hearing on these motions on January 28, 2025 (Doc # 66)
3. On January 31, 2025, the Court entered an Order (Doc # 68) denying Plaintiff's Motion for Clarification and Motion for Extension of Time, setting a deadline for Plaintiff to file a Second Amended Complaint of February 4, 2025 at 4:00pm local time.
4. As of February 24, 2025, Plaintiff had not filed an amended complaint and indicated as such on the record at the Case Management Conference.

5. On February 3, 2025, this Court entered an Order to Show Cause against the Plaintiff, John William Liccione (Doc #69) which was amended on February 11, 2025 (Doc #75) for the purposes of changing the hearing date to April 10, 2025.
6. At the Case Management Conference, Plaintiff made *ore tenus* motions to stay this action pending the outcome of a petition he filed with the Supreme Court of Florida and to ask for the recusal of Judges Ramsberger and Muscarella based upon his verbal allegations that they are either fact witnesses or victims to the acts Plaintiff is alleging.

Based on the foregoing, this Court hereby **ORDERS AND ADJUDGES** as follows:

- (1) Based on the December 20, 2024 and January 31, 2025 orders of this Court and that the Plaintiff has not filed an Amended Complaint, this case (24-002994-CI and 24-003939-CI as it pertains to Defendant Jennifer Griffith) is **DISMISSED** without prejudice. The Clerk of Court is directed to close the case file. This Court shall retain jurisdiction over any ancillary matters, including but not limited to the Order to Show Cause pending against the Plaintiff which is currently set for hearing on April 10, 2025.
- (2) Plaintiff's *ore tenus* Motion for Stay is **DENIED**.
- (3) Plaintiff's *ore tenus* Motion for Recusal is **DENIED**. The Court notes that recusals are voluntary and that the proper vehicle for a litigant to judicially seek the removal of a presiding judge is through a Motion to Disqualify, which must be filed in writing.

DONE AND ORDERED in Chambers, St. Petersburg, Pinellas County, Florida.


The Honorable Thomas Ramsberger
Circuit Court Judge

Copies to:

John William Liccione, Plaintiff *Pro Se* (jliccione@gmail.com)

George A.D. Thurlow, Counsel for Defendants (gthurlow@rahdertlaw.com)

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.

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Meet the Democratic Candidates for the District 13 Congressional Election

July 12, 2024 by Patrick Heinzen



The four candidates for the District 13 Congressional election debate with each other on July 13 at the St. Petersburg Marriott Clearwater.

Photo courtesy of the City of St. Petersburg

With election season coming back around, Pinellas County residents look to learn more about the candidates up for election. The district stretches from the southern parts of St. Pete Beach up to Tarpon Springs. At 6 p.m. on July 13, the Pinellas Democratic Party hosts a debate between four candidates.

Meet the District 13 Congressional Candidates:

Whitney Fox



Whitney Fox looks to take the District 13 Congressional seat in the upcoming election.

Photo via FloridaPolitics

Fox's website describes her as, "A mother who will fight to improve the quality of life for Florida's 13th district and the American people. Some focuses for her candidacy include protecting women's reproductive rights and healthcare. Also, she looks to protect Social Security and Medicare, and lower prescription drug costs.

Mark Weinkrantz



What does Mark Weinkrantz hope to achieve if elected to the District 13 Congressional seat?

Photo Via Mark Weinkrantz

Weinkrantz is similar in his approach to women's reproductive freedoms. Along with this, his website highlights how, "He believes in the American Dream and recognizes the need for compassionate and comprehensive immigration policies that honor America's legacy as a nation of immigrants."

The District 13 Congressional election candidates are not the only people you will vote for. [Read about the Pinellas County Supervisor of Elections candidates.](#)

Liz Dahan



Liz Dahan prepares for the debate for the District 13 Congressional election.

Photo via FloridaPolitics

Dahan also focuses on protecting women's rights. Her approach towards Social Security and medicare is similar to Fox's. Also, her website states, "She is passionate about protecting Florida's natural environment and recognizes that our vulnerability to rising sea levels, hurricanes, and coastal erosion requires bold legislative measures aimed at reducing carbon emissions, investing in renewable energy, and enhancing our natural defenses against climate-related disasters."

Sabrina Bousbar



Sabrina Bousbar's campaign for the District 13 Congressional election is heating up.

Photo via FloridaPolitics

Bousbar's website describes her as a "public servant and commonsense problem solver." Her goals are to make sure that families and individuals have access to viable "education, healthcare, housing, and jobs that every family needs and deserves."

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by Patrick Heinzen

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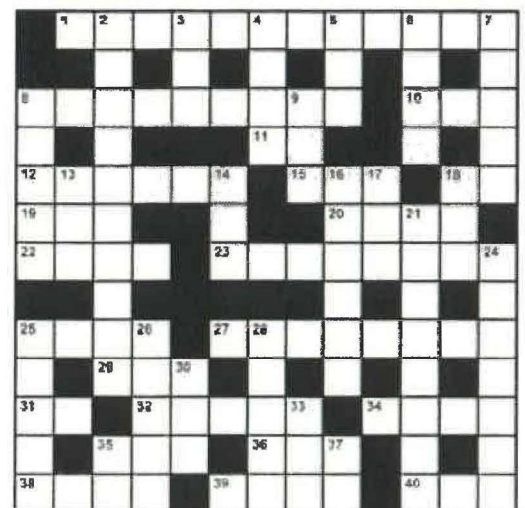
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A promotional advertisement for Budget Blinds. It features a large "30TH ANNIVERSARY" logo and a "30% OFF" discount. Below the discount, it lists services: Blinds, Shutters, Shades, and Motorization. The ad also includes a call to action: "Call now for your free consultation! 727-821-0976". At the bottom, it says "SHOWROOM BY APPOINTMENT ONLY 800 Pasadena Ave S" and "BUDGET BLINDS Style and service for every budget".

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TAB 10

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**Congressional District 13 Democratic
Primary Candidate Debate
Saturday, July 13th!**

Congressional District 13
Democratic Primary Candidate Debate





Whitney Fox



Mark Weinkrantz



Liz Dahan



Sabrina Bousbar

**Saturday, July 13, 2024, 6pm
St. Petersburg/Clearwater Marriott**

Hosted by the Pinellas Democratic Party

Moderated by Rob Lorei



We are pleased to invite you to participate in the Pinellas Democratic Primary Candidate Debate, scheduled to take place on July 13th, 2024, at the St. Petersburg/Clearwater Marriott. The event will begin at 6:00 PM.

The debate will be moderated by Rob Lorei, Managing Editor of Florida This Week at WEDU TV and News/Public Affairs Director at WMNF-88.5FM Tampa. Our debate format will include an opening statement from each candidate, followed by a question and answer session. We will then take a small mid-session break, after which we will proceed with questions from the audience. Audience questions can be submitted prior to the event via the button below.

We have the capacity to host 400 attendees, and we encourage you to invite your friends, family and neighbors.

This debate is designed to be a respectful and informative evening for the voters of Pinellas County to get to know their Democratic primary candidates before mail ballots are distributed. It is not intended as an opportunity for candidates to attack each other, but rather to share their visions and policies with the electorate. Please register to attend through the link below. We look forward to a productive and engaging discussion!

[Click to Attend the CD 13 Primary Debate!](#)

[Click to Submit a Debate Question](#)

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Gulfport Mayoral Candidate John Liccione's Time in Courts

February 26, 2025 by Ethan Perelstein



Gulfport mayoral candidate John Liccione's time in Courts include two civil suits.

Photo by Cameron Healy

Updated Mar. 2, 9:00 am

An earlier version of this article listed the Florida Democratic Party as a defendant in Liccione's suit, however Liccione has dropped them from all suits. Additionally, Liccione's suit names the former chair of the PDEC as a defendant, not the current chair, we've updated the article to reflect this and include the correct information.

The Gabber Newspaper *regrets the error.*

If John Liccione wins his mayoral race, Gulfport's mayor will be ordered to appear in court to explain why he shouldn't be held in contempt three weeks into his term.

John Liccione's Time in Courts

Gulfport mayoral candidate John Liccione has been ordered before Circuit Judge Thomas Ramsberger to explain why the Court should not find Liccione in direct criminal contempt.

This order to show cause sprung from a civil suit Liccione brought against the Pinellas Democratic Executive Committee. Liccione is suing the PDEC, among other named defendants, for alleged election fraud in his lost primary congressional race in Florida's 13th district.

In a hearing held on the phone, Liccione "disrupted the court numerous times, after being advised by the judge not to disrupt the hearing, continued to disrupt the Court's business," according to the official order. This was Liccione's third offense, according to the order.

Liccione Files Petition

On Feb. 20, Liccione filed a petition to the Florida Supreme Court asking them to compel the Second District Court of Appeals to remove Judge Ramsberger from his case and cancel the order to appear and contempt allegations.

The petition asks the court to "disqualify Judges Thomas Ramsberger and Patricia Muscarella, vacate their prior orders, and prohibit the contempt hearing." Judge Patricia Muscarella is the judge presiding over another lawsuit.

In the meantime, Liccione's order to show cause has been rescheduled to April 10. This would be a month after the Gulfport mayoral elections. If John Liccione is elected, Gulfport's mayor would be ordered to appear in court to explain why he shouldn't be held in contempt three weeks into his term.

Liccione's other lawsuit before Pinellas circuit courts (the one Muscarella is presiding over) names the parties he blamed for his loss in the congressional race. Among the defendants are the Pinellas County Supervisor of Elections, the then-chair of the PDEC, two other democratic candidates in the race, and *The Gabber Newspaper*.

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Tidal Basin

At the Feb. 4 City Council meeting, Liccione warned that “there are gonna be lawsuits” levied against Tidal Basin, the State’s contractor for assessing hurricane damage. He then posted about the incoming lawsuits on his blog.

“The power of the lawsuit is how we hold them accountable,” he said at the Feb. 18 meeting.

“I’m gonna be bringing a lawsuit, personally, against this contractor [Tidal Basin]”, he said. “I’m calling for those who are victims of this scheme to send me their information, their substantial damage letters.”

Liccione said this during public comment at the meeting, and is not doing this at the behest of the city.

Tidal Basin’s faulty Substantial Damage Letters (SDLs) have kept displaced Gulfportians out of their homes now more than 150 days after Helene. Gulfportians at the last two council meetings still fill public comment sections with complaints.

Liccione, who is not a member of any bar association and does not have a law degree, represents himself in his own lawsuits. Judge Ramsberger ordered him to appear to excuse himself for an inability to respect court proceedings. Now, Liccione proposes that he lead the charge in legal action against Tidal Basin.

“In my head, I’m already mayor,” he said at the February 18 City Council meeting.

Comments From Liccione

The Gabber Newspaper reached out to Liccione for comment on this article.

For accuracy, *The Gabber Newspaper* asked to record the conversation with Liccione.

He declined.

The Gabber Newspaper then offered to send Liccione questions in an email, so he could reply with his comment. He declined.

Liccione then asked to conduct the interview with no record. He requested that we share an advance copy of this article with him for approval. *The Gabber Newspaper* does not offer pre-publication review, and told him as much.

Liccione then agreed to answer questions via email; at press time, he had not done so.

The Gabber Newspaper's Election Coverage

As a newspaper, it is not our job to have an opinion about the campaigns and candidates. Our job is to report what happens, what key players say and do, and any legal activity concerning the campaign. This includes campaign finance reporting, basic investigation into the candidates (and, as warranted, their families), and any unusual campaign activities. Read *The Gabber Newspaper's* [full statement on our elections ethics](#).

by Ethan Perelstein

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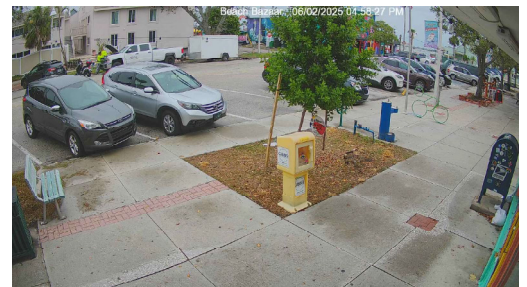
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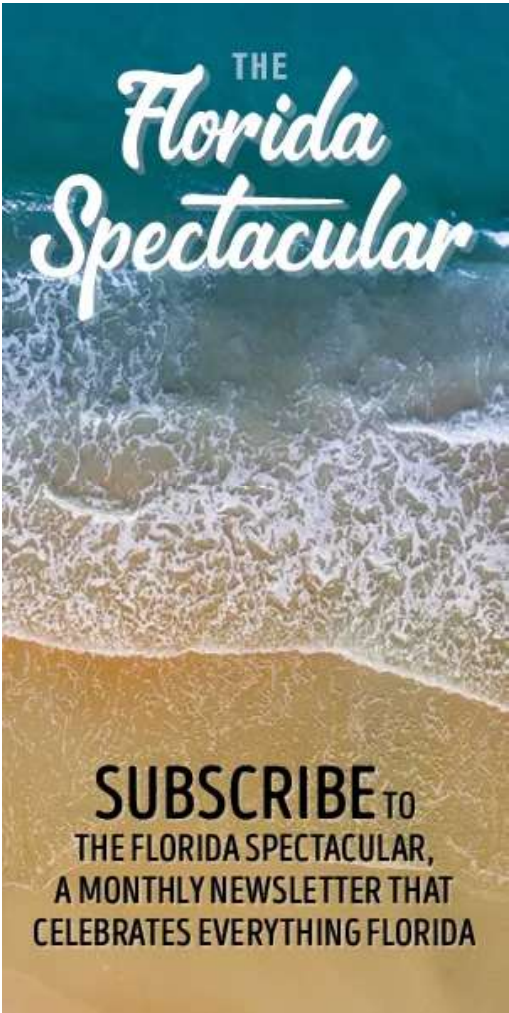
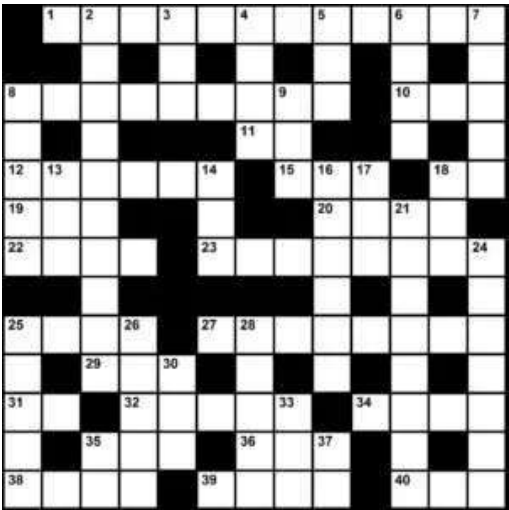
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OP-ED: Cocktails and Campaigns: Gulfport Candidates Recrafted as Cocktails

March 9, 2025 by Morgan Wujkowski



This election season in Gulfport, sip the vote.

Photo by Morgan Banno

Updated March 10, 2:26 p.m.

Editor's note: This is an opinion piece only about Gulfport candidates running for city council, reimagined as cocktails.

The views and opinions here do not necessarily represent the opinions of anyone at The Gabber Newspaper, its owners, staff, or advertisers.

Let's face it: Election season can be a headache-inducing spectacle of debates, promises, and yard signs cluttering the neighborhood. But what if we shook things up — literally — and reimagined the candidates running for Gulfport office as cocktails? From fiery libations to watered-down spritzers, each political persona has a flavor profile all its own. Because really, isn't every campaign just a mix of bold claims, bitter truths, and a splash of something sweet to make it go down easier? I don't know about you, but this election season in Gulfport makes me want to drink. Grab a shaker and swizzle stick—this is one round of politics you'll actually want to toast to.

In alphabetical order, the Gulfport candidates as cocktails:

The Mayoral Cocktail

Sam Henderson: Martini

Sophisticated and smooth, this gin-based classic is the perfect representation of a polished negotiator who prefers their solutions shaken, not stirred. Like a martini, Henderson is dependable and charming, with established roots in the government. No need to fix what isn't broken.

Karen Love: Negroni

The Negroni is a polarizing cocktail: You either love it or you despise it, much like the politician it represents. Bold and complex with equal parts of gin, Campari, and sweet vermouth, it's the drink for those who divide opinions. And truth be told, I'm not sure it can stand on its own.

John Liccione: White Sangria

Sweet and boozy with a little too much going on, this fruit-packed drink captures the essence of a politician whose career is as colorful as their reputation. Who else would have the audacity to run for City Mayor while concurrently suing local businesses? Poor taste... Much like cheap, white sangria.

The Ward II Cocktail

Christine Brown: Mojito

This cocktail is for the candidate who rises from humble beginnings, rallying support one leaf at a time. Minty and unpretentious, the mojito, much like Christine Brown, is an acquired taste, but worth it compared to the rest of the menu. Right when I think we should 86 the mojito from the menu, the alternatives pale in comparison.

Byron Chalfont: Your Backyard Neighbor's First Home Brew

There's always someone on the block who thinks it's a brilliant idea to brew their own beer, not unlike the person who thinks it's a great idea to run for office just because. Owning a local business doesn't make you the ideal city council candidate. "Working for the betterment of Gulfport" is about as vague and dull of a platform as it gets.

Marlene Shaw: Flat Hard Seltzer

What might have been seen as flashy at one point is now a bit flat, much like the politicians running for Ward II. What is it with candidates assuming we're impressed that they run local Facebook pages? I need more bubbles and concrete ideas, please. This hard seltzer has lost its fizz and the campaigning has only just begun.

Ward IV: The Unopposed Cocktail

Nancy Early: Paloma

Running unopposed is lucky in an election. The Paloma is a crowd-pleasing concoction that is fresh and effervescent, like the candidate for Ward IV. I hope she brings vibrant ideas to the dais, and I look forward to what she'll bring to the party.

Cheers to democracy, one drink at a time!

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by **Morgan Wujkowski**

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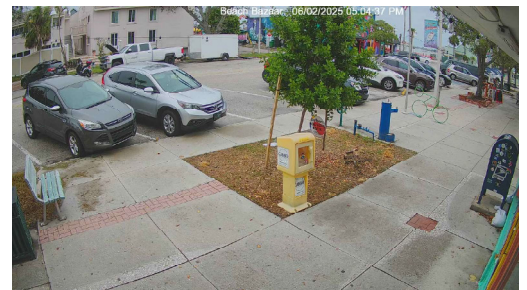
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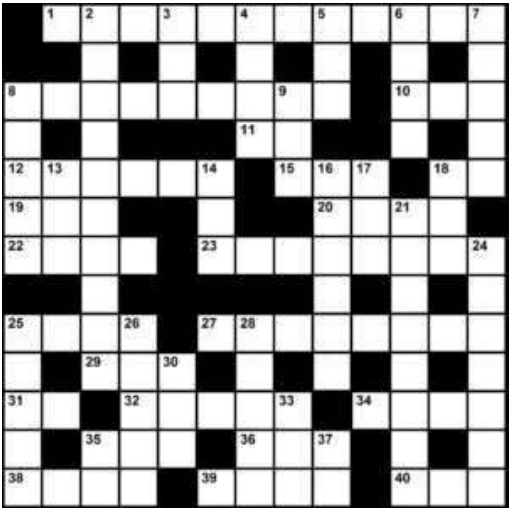
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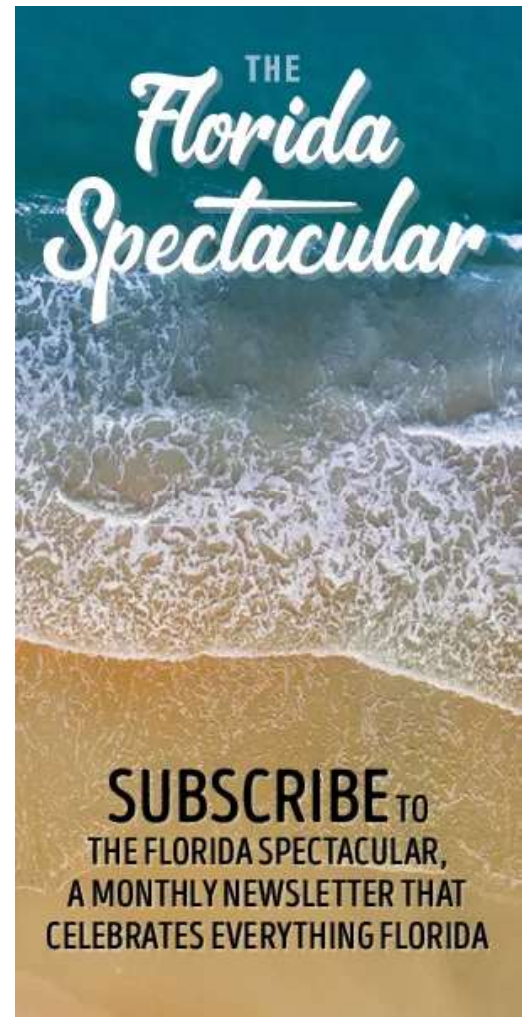
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