

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

CHRISTOPHER GLEASON, Candidate for Supervisor
of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity
as Pinellas County Supervisor of Elections, et al.,

Defendants.

**MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE
INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL
PRACTICE AND JUDICIAL ADMINISTRATION**

COMES NOW, Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections by and through undersigned counsel pursuant to Rule 2.425 and seeks an Order related to Plaintiff's failure to minimize the filing of sensitive information and as grounds therefor does state:

1. As of the filing of this motion, the Clerk has docketed 31 different sets of exhibits filed with Plaintiff's Complaint.
2. Additionally, Defendant Supervisor Marcus was served with a thumb drive containing additional confidential information which does not appear on the Court's docket.
3. In PDF, these exhibits on the Court docket are approximately 16.8 mb of PDFs.
4. The undersigned as well as the Defendant Supervisor Marcus have reviewed the voluminous exhibits and have attempted to identify the types of sensitive or confidential information contained in each docketed exhibit. However, since Plaintiff blatantly

disregarded the rule regarding the minimization of sensitive information, the exhibits are voluminous, the filing of sensitive information is pervasive throughout the extensive exhibits which are not bates-stamped, the time to respond to Plaintiff's Contest of Elections is shortened to ten (10) days, and the Defendant and Clerk of Court are governmental entities and stewards of tax dollars and court fees, this motion does not identify each page containing sensitive information.

5. Defendant has identified the following exhibits as containing confidential and/or sensitive information as follows:

a. Docket 18, Exhibit G contains confidential information on PDF pgs. 2 and 4 of 24 – configuration report from March 19, 2024.

- i. This photograph was taken in violation of Florida Statutes, section 102.031;
- ii. This photograph reveals information which is confidential and exempt from public records pursuant to Florida Statutes, section 119.0725.

b. Docket 4, Exhibit E contains sensitive and confidential information including:

- i. An e-mail from Dustin Chase to Cathi Chamberlain which includes confidential information, to wit: the date of the voter's vote-by-mail ballot request was made is confidential pursuant to Florida Statutes, section 101.62(3), as set forth in DE12-10 attached as an Exhibit to Plaintiff's Complaint;
- ii. Untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A);
- iii. Complete telephone number(s) in violation of Rule 2.45(a)(4)(E);
- iv. Complete driver's license number(S) in violation of Rule 2.45(a)(4)(C); and
- v. A portion of a social security number in violation of Rule 2.45(a)(3)(A).

- c. Docket 9 contains a complete driver's license number(s) in violation of Rule 2.45(a)(4)(C) (pdf 4/4).
- d. Docket 10 contains a complete driver's license number(s) in violation of Rule 2.45(a)(4)(C) (pdf 4/4).
- e. Docket 11 contains a complete driver's license number(s) in violation of Rule 2.45(a)(4)(C) (pdf 4/4).
- f. Docket 12 contains a complete driver's license number(s) in violation of Rule 2.45(a)(4)(C) (pdf 4/4).
- g. Docket 14, Exhibit F, Untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A); and Complete telephone number(s) in violation of Rule 2.45(a)(4)(E), which may be limited to the Plaintiff's or governmental.
- h. Docket 17 contains a complete driver's license number(s) in violation of Rule 2.45(a)(4)(C).
- i. Docket 19 contains complete telephone number(s) in violation of Rule 2.45(a)(4)(E).
- j. Docket 22, Exhibit L, contains a complete telephone number in violation of Rule 2.45(a)(4)(E) and an untruncated e-mail address in violation of Rule 2.45(a)(5)(A) and which may be limited to governmental.
- k. Docket 26 contains complete telephone numbers in violation of Rule 2.45(a)(4)(E) and untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A).
- l. Docket 27 contains untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A), which may be limited to the Plaintiff's or governmental.

- m. Docket 28, Exhibit F, Docket 27 contains untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A), which may be limited to the Plaintiffs or governmental.
 - n. Docket 30, Exhibit O, contains untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A) and complete telephone numbers in violation of Rule 2.45(a)(4)(E), although Plaintiff redacted some e-mail addresses completely.
 - o. Docket 31, Exhibit P, contains untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A), which may be limited to governmental addresses.
 - p. Docket 32, Exhibit Q, contains complete telephone number in violation of Rule 2.45(a)(4)(E), which may be limited to governmental numbers, and untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A).
 - q. Docket 34, Exhibit S, contains a complete telephone number in violation of Rule 2.45(a)(4)(E) and untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A), both of which are governmental.
 - r. Docket 35, Exhibit U, contains untruncated e-mail addresses in violation of Rule 2.45(a)(5)(A), although Plaintiff redacted some e-mail addresses completely.
6. The allegations and exhibits filed in this case, including sensitive information, are being used in other matters pending before this and other courts, necessitating resources of the Defendant be spent compensating for Plaintiff's failure to take appropriate action to minimize the filing of confidential and sensitive information.

WHEREFORE, in consideration of the above, Defendant respectfully requests that the confidential information contained in Exhibit E be redacted from the public court file, absent a finding of waiver by the Affiant whose confidential information is disclosed, that Exhibit G be sealed, and that the Defendant be compelled to identify with specificity the location of

sensitive information and bear the cost of minimizing sensitive information in his court filings and any other such relief this court deems appropriate, including but not limited to the costs, including attorney's fees, incurred in the identification of sensitive information within the Court file and the preparation of this motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was filed with the Clerk of the Circuit Court by using the Florida Courts E-Filing Portal and simultaneously served through the E-Portal to **CHRISTOPHER GLEASON, PRO SE**, Plaintiff at gleasonforpinellas@gmail.com, cpgleason72@gmail.com and immutabletruth@protonmail.com on the 13th day of September 2024.

/s/ Jared D. Kahn

JARED D. KAHN

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