

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

CHRISTOPHER GLEASON,

Plaintiff,

vs.

CASE NO.: 23-006698-CI

**PINELLAS COUNTY
SUPERVISOR OF ELECTIONS
OFFICE,**

JULIE MARCUS, in her official capacity as Supervisor of Elections of Pinellas County, Florida, and **DUSTIN CHASE**, in his official capacity as Deputy Supervisor of Elections of Pinellas County Florida.

Defendants.

**MOTION TO COMPEL PRODUCTION OF DOCUMENTS, DATA, AND
ORDER DEPOSITION OF DEFENDANTS**

Please take notice that the undersigned, Christopher Gleason, hereby moves this Honorable Court pursuant to Rule 1.310(b)(6) of the Florida Rules of Civil Procedure for an order compelling PINELLAS COUNTY SUPERVISOR OF ELECTIONS OFFICE, Julie Marcus and Dustin Chase to produce the following documents, information, or objects related to Plaintiff's Petition For Emergency Writ of Mandamus, Forging, Altering, Uttering of Official Election Records, and deprivation of Plaintiff's rights under the color of law by the Pinellas County Supervisor of Elections Office, Julie Marcus, and Dustin Chase:

1. Copies of all contracts with ES&S, Clear Ballot, and Runbeck, also proof of payment/receipts for the contracts.

2. ES&S Election system election reports in the .LST, .txt file format unredacted in their original format for 2018, 2020, and 2022 elections “OFFICAL RESULTS” with all data for all races and all ballots with detail.
3. All .PST files for the Supervisor of Elections email accounts for Julie Marcus, Dustin Chase, and Matt Smith.
4. All emergency computer backup and archive files for the Supervisor of Elections email accounts for Julie Marcus, Dustin Chase, and Matt Smith.
5. ES&S System Audit Logs, known as EL68A and EL68 known as Results Corrections Log.
6. Copy of ES&S Voting System EMS documentation for generating system reports.
7. ES&S DS850 and DS200 Tabulators user guide chapters related to generating election systems reports.
8. Copy of Pinellas County Supervisor of Elections oaths of office for Julie Marcus and Dustin Chase.
9. Copy of FLORIDA SUPERVISOR OF ELECTIONS INC INVOICES FOR DUES For Julie Marcus and Proof of Payment for DUES paid by Pinellas County.
10. Copy of Florida Voting System Standards Form DS-DE 101, Eff. 1-12-05
11. Copy of ES&S Documentation regarding file encryption and document/file validation hashing.
12. Copy of Logic and Accuracy Testing Reports for 2018, 2020, and 2022 elections.
13. Copy of ES&S Election Systems - Hash Check Procedures ES&S DS850, DS200, ES&S EMS System in use in Pinellas County Florida by Pinellas County Supervisor of Elections.

The requested documents, information, or objects are relevant and necessary to the preparation of Christopher Gleason in this matter and are not readily available to Plaintiff through any other means. Specifically, the documents and information related to ES&S and Runbeck contracts, election system election reports, system audit log, and EMS software are necessary to establish the facts surrounding the

forging, altering, and uttering of “OFFICIAL ELECTION RECORDS” and the deprivation of rights under the color of law by Pinellas County Supervisor of Elections Office, Julie Marcus, and Dustin Chase. Moreover, the tabulators user guide chapters related to generating reports are necessary to understand the procedures for generating reports.

Pursuant to Rule 1.310(b)(6), a 30(b)(6) deposition notice and subpoena will be served upon Pinellas County Supervisor of Elections Office, Julie Marcus, and Dustin Chase to designate one or more persons to testify on its behalf and produce the requested documents, information, or objects. The deposition will be held at a mutually agreed-upon time and place with a court reporter to also be video recorded within the next 30 days.

WHEREFORE, Christopher Gleason respectfully requests that this Honorable Court grant this motion for a 30(b)(6) subpoena to produce documents and schedule a hearing on this motion as soon as possible.

DATED this 15th day of May, 2023.

Respectfully submitted,

/S/ Christopher Gleason
Christopher Gleason
Pro Se
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Clearwater, FL 33767
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the below named parties by U.S. mail, fax or email, this 15th day of May, 2023.

/S/ Christopher Gleason
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Copies furnished to:

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