

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 2024-CA-001976

ROBERT ROCHFORD,

Plaintiff,

v.

KATHY CASTOR, in her capacity
as the Democratic candidate for
U.S. Congressional District 14,
HILLSBOROUGH COUNTY
CANVASSIGN BOARD,
PINELLAS COUNTY
CANVASSING BOARD,
JULIE MARCUS, in her capacity
as Supervisor of Elections,
CRAIG LATTIMER, in his capacity
as Supervisor of Elections,
FLORIDA ELECTIONS CANVASSING
COMMISSION, and SECRETARY
OF STATE CORD BYRD,
in his capacity Chief Elections Officer,

Defendants.

**PLAINTIFF'S MOTION FOR LEAVE TO AMEND COMPLAINT
AND AMEND STYLE OF THE CAUSE**

The Plaintiff ROBERT ROCHFORD, by and through his undersigned counsel, and pursuant to Fla. R. Civ. P. 1.190, hereby files his Motion for Leave to Amend Complaint following the Order on Case Management on the above case, and in support thereof states as follows:

1. On November 27, 2024, the Plaintiff, ROBERT ROCHFORD filed his Complaint in the above action.

2. On January 8, 2025, following the Case Management Conference, the Court gave a limited time for the Plaintiff to file a Motion to Amend Complaint that will not include an election challenge, but rather a challenge to the voter rolls.

3. Therefore, the Plaintiff, ROBERT ROCHFORD, is asking this Court for leave to file an Amended Complaint that will not include an election challenge but rather a challenge to the voter rolls.

4. Florida Rule of Civil Procedure 1.190(e) grants the trial court broad discretion in allowing [amendments] and provides that leave to amend should be liberally granted. *Craig v. East Pasco Med. Ctr.*, 650 So. 2d 179, 180 (Fla. 2d DCA 1995); *Hatcher v. Chandler*, 589 So. 2d 428, 429 (Fla. 1st DCA 1991).

5. Furthermore, it is well-established in Florida case law that. “[a]s a general rule, ‘leave to amend should not be denied unless the privilege has been abused, there is prejudice to the opposing party, or amendment would be futile.’” *N. Am. Specialty Ins. Co. v. Bergeron Land Dev., Inc.*, 745 So. 2d 359, 362 (Fla. 4th DCA 1999) (citing *Life Gen. Sec. Ins. Co. v. Horal*, 667 So. 2d 967, 696 (Fla. 4th DCA 1996).

6. As such the Plaintiff, ROBERT ROCHFORD, seeks to file his Amended Complaint, which is attached hereto and marked as Exhibit “A.”)

7. Moreover, as KATHY CASTOR, who appears to have won the election for the House of Representatives in the 14th Congressional District but has no responsibilities as to the Voter Rolls of Pinellas County and Hillsborough County, as the election challenge is no longer part of this case, she has been dropped as a Defendant.

8. Here, the Plaintiff, ROBERT ROCHFORD, is not abusing his privilege to amend, nor will this amendment result in any prejudice to an opposing party,.

9. This Motion is made in good faith and not for the purpose of causing unreasonable delay.

WHEREFORE, the Plaintiff, ROBERTO ROCHFORD, respectfully requests this Honorable Court grant the Motion for Leave to File an Amended Complaint, to permit the change of the Style of the Cause, and to provide such further and other relief as this Court may deem just and proper.

DESIGNATION OF EMAIL ADDRESS(ES) FOR SERVICE

(Pursuant to Rule 2.516 Fla. R. Jud. Admin.)

The undersigned attorneys of The Ticktin Law Group hereby designate the following Email Address(es) for service in the above styled matter. Service shall be complete upon emailing to the following email address(es) in this Designation, provided that the provisions of Rule 2.516 are followed.

Serv512@LegalBrains.com Serv536@legalbrains.com,

SERVICE IS TO BE MADE TO EACH AND EVERY EMAIL ADDRESS LISTED IN THIS DESIGNATION AND TO NO OTHERS.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been emailed this 28th day of January 2025, to COLLEN O'BRIEN, ESQUIRE, cobrien@votehillsborough.gov, Hillsborough County Supervisor of Elections Office, Counsel for Craig Latimer, 601 E. Kennedy Boulevard, 16th Floor, Tampa, Florida 33602, ANDREW P. KEEFE, ESQUIRE, eservice@pinellas.gov, Senior Assistant County Pinellas County Attorney's Office, Counsel for Pinellas County Canvassing Board and Julie Marcus, 315 Court Street, Sixth Floor, Clearwater, Florida 33756, LAURA L. VAUGHAN, ESQUIRE, lvaughan@lauravaughanlaw.com, Counsel for Kathy Castor, 3016 W. Harbor View Avenue, Tampa, Florida 33611, STEPHEN M. TODD, ESQUIRE, todds@hcfl.gov, Henryka@hcfl.gov, Pages@hcfl.gov, Sr. Assistant County Attorney, Counsel for Hillsborough County Canvassing Board, P.O. Box 1110, Tampa, Florida 33601-1110, JOSEPH S. VAN DE BOGART, ESQUIRE, joseph.vanderbogart@dos.fl.gov, Florida Department of State, Counsel for Secretary of State Cord Byrd, 500 South Bronough Street, Gray Building, Suite 100, Tallahassee, Florida 32399-0250.

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 /s/ Peter Ticktin
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Florida Bar No. 1055035

Our Matter No.: 24-0427

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 2024-CA-001976

ROBERT ROCHFORD,

Plaintiff,

v.

SECRETARY OF STATE CORD
BYRD, in his capacity Chief
Elections Officer, HILLSBOROUGH
COUNTY CANVASING BOARD,
PINELLAS COUNTY CANVASSING
BOARD, JULIE MARCUS, in her
capacity as Supervisor of Elections,
CRAIG LATTIMER, in his capacity
as Supervisor of Elections, and the
FLORIDA ELECTIONS
CANVASSING COMMISSION,

Defendants.

**AMENDED COMPLAINT FOR DECLARATORY RELIEF,
A WRIT OF MANDAMUS, AND
PURE BILL OF DISCOVERY**

The Plaintiff, ROBERT ROCHFORD, hereby files his Complaint for Declaratory Relief, a Writ Of Mandamus, and a Pure Bill Of Discovery, and in support thereof, states as follows:

Introduction

1. The Plaintiff, Robert Rochford, was an unsuccessful candidate with respect to the U.S. Congressional District 14 seat in Florida, and after he appeared to have lost

the November 5, 2024 Election, it became apparent that there were serious issues which showed that the election was not proceeding in a fair manner.

2. Mr. Rochford is a registered Republican and was a candidate for the U.S. Congressional District 14 seat in Florida, in the general election.

3. Mr. Rochford lost in the general election to Kathy Castor, and he hereby now seeks a Declaratory Judgment in which he asks that this Court determine that the safeguards which protect against fraud was not in operation for both Hillsboro County and Pinellas County, for the 2024 Election. Moreover, a Writ of Mandamus is sought to require that the Defendants correct the problems with the Voter Rolls, and lastly, This Court has jurisdiction to preside over a Pure Bill of Discovery pursuant to Florida Statute § 26.012 as it involves an equitable action to obtain discovery to evaluate whether there has been an intrusion into the Voter Rolls to control the outcome of elections in the State of Florida.

4. This action is a Pure Bill of Discovery, as well, to provide an avenue for the Plaintiff to marshal evidence to correct the voting issues present in the State of Florida.

Jurisdiction and Venue

5. This Court has jurisdiction over this action as the events giving rise to this action occurred in the State of Florida.

6. Venue is proper in Leon County, Florida, as the Secretary of State of Florida, a Defendant in this action, is located in Leon County, this action involves a statewide issue affecting the results of the general election, in particular U.S. Congressional District 14 and the rest of the State of Florida.

The Parties

7. The Plaintiff, Robert Rochford, is a resident of Hillsborough County, Florida,

and was a candidate in the Republican Primary election for Florida Congressional District 14, which is located in both Pinellas County and Hillsborough County, Florida.

8. The Defendant, Cord Byrd, is the Secretary of State of Florida and Chief Elections Officer, responsible for overseeing the Florida Department of State, Division of Elections.

9. The Defendant, Pinellas County Canvassing Board, is responsible for canvassing the votes in Pinellas County and certifying the election results.

10. The Defendant, Hillsborough County Canvassing Board, is responsible for canvassing the votes in Hillsborough County and certifying the election results.

11. The Defendant, Florida Elections Canvassing Commission, is responsible for canvassing votes in the State of Florida and certifying the election results.

12. The Defendant, Julie Marcus, is the Supervisor of Elections for Pinellas County and is responsible for overseeing the election process in Pinellas County.

13. The Defendant, Craig Lattimer, is the Supervisor of Elections for Hillsborough County and is responsible for overseeing the election process in Pasco County.

Prefatory Statement

14. Those citizens who voted in the November 5, 2024 election in U.S. Congressional District 14 which encompassed part of Pinellas County and part of Hillsborough County, Florida first were required to register in the county in which they resided. The list of registered voters is known as and referred to as the "Voter Roll."

15. An examination of the Voter Roll shows that there is a multitude of "clones" in the lists of the voters who are registered to vote in Florida. They are referred to as

“clones” because they are either duplicates or near-duplicates except that invariably, they have different voter identification numbers.

16. By having clones of other voters with unique Voter ID Numbers, the system is open for individuals who can access or “hack” into the government’s computers to cast votes of the dormant clones in a manner which would be undetectable. Moreover, if this is coupled with the procedures to vote by mail, as in the situation which occurred in the 2024 Election the entire Voter Roll system will be shown to be corrupted.

17. Citizens who have already registered are permitted to request a “Mail-in-Ballot,” which they can submit in person, by mail, or on-line. For the most part, the citizens of Pinellas County requested an average of 408 Mail-in-Ballots in the 4 month period preceding the to the November 5, 2024 Election (leaving out one day, September 9, 2024). The number of such requests would typically range from 0 to about 3,000, with an outlier of 6,313. However, on one day, September 9, 2024, there were 198,166 requests for Mail-In Ballots on that one day.

18. Of the incredible number of requests for Mail-In Ballots, 52,589 Mail-In Ballots were in Congressional District 14 of which 40,161 voted. In Hillsborough, County for District 14, there were a total of 93,257 Vote-by-Mail Ballots requested of which 73,224 voted, of those which voted, there for the days when the Voter Fraud Protection System was off or being overridden on days when 122,971 Mail in Ballots were requested, and of those, 96,188 voted in District 14.

19. As such, the number by which Mr. Rochford lost the election, 57,670 was far less than the suspect ballots when adding the two counties together.

20. Also, both Pinellas County and Hillsborough County have a Voter Fraud

Protection System which is designed to catch and reject a Request for a Mail-In Ballot if there were more than 5 applications use the same address and where inadequate identification information was provided.

21. There are 2 pieces of information which are requested, of which 1 is required, either 1) a Driver's License or Florida Identification Number or 2) the last 4 digits of a voter's social security number. On September 9, 2024, in Pinellas County alone, 198,166 requests were dumped into the system in Pinellas County, and those requests were made with the Voter Fraud Protection System turned off or somehow overridden. This is known as there were 37,495 unacceptable Requests for Vote-by-Mail which were accepted notwithstanding that they did not provide a Driver's License Number, a Florida Voter Identification Number, or the last 4 digits of a social security number.

22. The only way that those requests without that vital information could have been processed was by having the Voter Fraud Protection System turned off or overridden.

23. As such the other protections which would have caught requests for Vote-by-Mail Ballots for listing an address where more than 5 applicants sought the ballots to be sent, or which would have caught other issues, were not working.

24. In Hillsborough, County for District 14, there were a total of 93,257 Vote-by-Mail Ballots requested of which 73,224 voted, of those which voted, the Voter Fraud Protection System was off or being overridden on days when 122,971 Mail in Ballots were requested, and of those, 96,188 voted in District 14.

25. As such, the number by which Mr. Rochford lost, 57,670 was far less than the suspect ballots when adding the questionable ballots of the voters in District 14 of

both Pinellas County and Hillsborough County.

26. Then, when one examines the voting which occurred of the clones, the election was further undermined.

Factual Allegations Regarding Vote-By-Mail-Ballots

27. In 2021, the passage of SB 90 the update to Florida Statute § 101.62, necessitating additional identifiers for vote-by-mail ballot requests, aimed to enhance the integrity of the election process by verifying the authenticity of such requests. That statutory requirement reflected the state's commitment to preventing election fraud and ensuring that each vote is legally cast. This was reflected in *Jacobs v. Seminole County Canvassing Board*, 2000, Fla., 773 So. 2d 519, which addressed the differential treatment in handling absentee ballot requests and underscores the importance of adhering to statutory requirements to maintain the integrity of the election process.

28. This information is then required to have been recorded in the Florida Voter Registration System and was received by the Florida State Division of Elections, which then combined all county files and made them available upon request by qualified individuals and entities in accordance with Florida Statute § 101.62(2) and is referred to as the Vote-by-Mail Report.

29. The role of the County Supervisor of Elections, as outlined in Florida Statute. § 101.62(2), is critical in recording and verifying the information necessary to ensure the legitimacy of vote-by-mail ballots. This procedural safeguard is designed to prevent unauthorized access and fraud, emphasizing the importance of internal controls in the election process.

30. The Defendants, Julie Marcus and Craig Latimer, in their role as County

Supervisor of Elections for Pinellas County and for Hillsborough Counties, respectively, and in accordance with Florida Statute § 101.62(2) were specifically required to record for each vote-by-mail ballot received, specific information which was to include the Florida driver license number/Florida identification card number, or the last four digits of the potential voter's social security number.

31. This information should have then been recorded in the Florida Voter Registration System and received by the Florida State Division of Elections, which then was required to combine all county files and make them available upon request by qualified individuals and entities in accordance with Florida Statute § 101.62(2) and is referred to as the Vote-by-Mail Report.

32. Unfortunately, for the November 5, 2024 election, U.S. Congressional District 14, failed to obtain and/or record the voter identification confirmation information. The failure to provide the required identification for vote-by-mail ballot requests, as observed in U.S. Congressional District 14 directly contravened Florida Statute § 101.62. That violation not only undermined the statutory framework established to secure the election process, but it also invited misconduct and fraud, which jeopardized the reliability of election results. The *In re Matter of the Protest* 1998, Fla. Dist. Ct. App., 707 So. 2d 1170, case illustrates the judiciary's role in addressing and remedying instances of election fraud, particularly through the invalidation of improperly issued ballots, to uphold the sanctity of the electoral process.

33. In U. S. Congressional District 14, as of November 5, 2024, the number of vote-by-mail ballot requests made, that did not provide identification as is required per Florida Statute § 101.62 was 37,495. Of the 37,495 ballots sent without the required voter

confirmation information, 29,544 voted.

34. These numbers are substantiated in a Vote-by-Mail (VBM) Report as of November 5, 2024, which shows in the columns titled “FLDL/StateID” and “VoterSSN4,” a designator of “N” in both columns, which is defined by DS-DE-145 as “information was NOT provided”.

35. In the November 18, 2024, VBM Report of those VBM ballot requests which had "N" as a designation for the "FLDL/StateID" and "VoterSSN4" column in the VBM report dated November 7, 2024, 25 had the designator for those columns altered as to the "FLDL/StateID" and "VoterSSN4" in the report. This can only occur with a manual override of the internal controls in the system which further supports the complete and systemic breakdown of all internal controls.

36. When comparing the VBM report from August 27, 2024, to the VBM report on November 5, 2024, the “request date” for 36,622 VBM requests, were changed. Almost all records which had an altered “request date”, occurred with those requests that had a “N” designator for the FLDL/StateID and VoterSSN4 in both reports. Most requests also happened on the same date, with the August 27 report date having the requests made on Sunday June 23, 2024, and the November 5 report date having the requests made on Monday, September 9, 2024.

37. DS-DE 145 VBM Request Information File Layout states the only two designators that can be documented in those fields are “Y” which is defined as “information was provided” or “N” which is defined as “information was not provided.”

38. The issuance of vote-by-mail ballots by the Defendants Julie Marcus, Supervisor of Election in Pinellas County and Craig Lattimer, Supervisor of Elections for

Hillsborough County, without the requestor having provided the required identification is in violation of Florida Statute § 101.62 and constitutes official misconduct in violation of Florida Statute § 838.022.

39. Because it is the responsibility of the Secretary of State as the chief elections officer of the State of Florida to obtain and maintain uniformity in the interpretation and implementation of the election laws, Chief Election Officer Cord Byrd is in violation of Florida Statute §§ 97.012(1), 97.052, 106.22, 98 for allowing the violation of Florida Statutes §§ 101.62(1)(b), 101.62(6), 104.051(2), and 104.051(3), by Julie Marcus, Supervisor of Election in Pinellas County and Craig Lattimer, Supervisor of Elections for Hillsborough County.

40. The entire vote-by-mail process is compromised because of the severe material and systemic breakdown of all internal controls in the entire voting process. This breakdown of internal controls allows, invites, and encourages fraud, misconduct, and corruption, and cannot produce any reliable election results.

41. To further illustrate the complete systemic breakdown of internal controls in the vote-by-mail request and issuance process, we also reference the Voter Focus manual. Voter Focus is a complete voter registration and election management system used by the counties. Voter Focus offers an optional feature to help detect fraudulent vote-by-mail requests submitted on the Supervisor of Elections websites. This Vote-By-Mail Fraud Detection is optional and can be turned on or off at will. The ability to turn the fraud detection system on or off is a complete lack of internal controls which not only invites fraud, misconduct, and corruption, but allows it to go unchecked.

42. The optional Vote-By-Mail Fraud Detection feature in the Voter Focus

system, and its discretionary use, exemplifies the lack of stringent internal controls within the vote-by-mail request and issuance process. This discretionary approach could allow for unchecked fraudulent activities, further compromising the election's integrity. The decision *Jacobs v. Seminole County Canvassing Board* 2000, Fla., 773 So. 2d 519, while addressing different facts, underscores the judiciary's consideration of the election officials' actions and the impact of those actions on the election's integrity.

43. Because of this systemic breakdown of internal controls all Mail-In Ballots requested on days where the requestor did not provide any required identification yet was issued a Mail-In Ballot, must be considered null and compromised because there were no internal controls in place the day they were requested to prevent fraud. The total number of Mail-In Ballots requested on such days was 122,966. Of those 122,966 that were requested, 96,188 were voted. This not only had a material impact on election results but were the determining factor of the election and this number constituted all of the vote-by-mail ballots voted in the election.

44. To further illustrate the systemic breakdown of internal controls which then allowed fraud and misconduct, those Mail-In Ballot Requests which had "N" as a designation for the "FLDL/StateID" and "VoterSSN4" column in the Vote By Mail report dated November 5, 2024, 13,973 had the designator for those columns mysteriously altered to "Y" and "Y" for the "FLDL/StateID" and "VoterSSN4" in the report the very next day. This is in violation of Florida Statute § 104.051.

45. It is important to note that the entire vote-by-mail system is compromised because the requirement to provide identification when requesting a vote-by-mail ballot is the first and only level of internal control to prevent unauthorized access and fraud.

Because there was a complete breakdown in the critical internal controls that prevent fraud, tens of thousands of unauthorized vote-by-mail ballots were illegally requested and issued. This is clearly indicated by the very report provided by the Division of Elections which shows all the vote-by-mail ballots requested, and whether those requests had provided the statutory required identification for issuance.

46. The breakdown of internal controls which are designed to prevent fraud creates an environment which invites rampant fraudulent behavior by all those who wish to perpetuate this fraudulent behavior. No vote-by-mail ballot issued on a day in which there was a breakdown in internal controls can be considered valid because the first control in place, requesting and providing identification, was not present. This amounts to a total of approximately 122,971 compromised vote-by-mail ballots, of which approximately 96,188 were voted. This not only had a material impact on the election results but were probably the determining factor of the election.

47. In the November 7, 2024 the Vote By Mail Report shows that of those Mail-In Ballot Requests which had "N" as a designation for the "FLDL/StateID" and "N" in the "VoterSSN4" column in the Vote By Mail Report dated November 5, 2024, 16 had the designator for those columns fraudulently altered to for the "FLDL/StateID" and "VoterSSN4" in the report. This can only occur with a manual override of the internal controls in the system which further supports the complete and systemic breakdown of all internal controls. It is impossible to have had historical data suddenly change but the request date stay the same. This is in violation of Florida Statute § 104.051.

48. The allegations in this case involve serious claims of election fraud and misconduct that materially affected the outcome of the November 5, 2024, election.

However, it is not known or understood exactly who or how the Voter Roll is being corrupted, only that it is corrupted in spite of the efforts of the Defendants to cause the elections to be fair and transparent.

49. As demonstrated in *Gore v. Harris*, 773 So. 2d 524 (Fla. 2000), allegations of election fraud and misconduct are of paramount importance to the integrity of the electoral process. Election contests are not merely about individual candidates but about safeguarding the right of voters to have their ballots counted fairly. Plaintiff's allegations, including the unauthorized request and issuance of vote-by-mail ballots, the use of uncertified voting systems, and the breakdown of system internal controls, materially impacted the results of the election and therefore warrant judicial intervention.

Count I – Declaratory Relief

50. The Plaintiff avers the allegations of Paragraphs 1 through 49, above, and incorporates them in this Count, as though fully restated herein.

51. In Count I, the Plaintiff seeks this Court to enter a Declaratory Judgment pursuant to the Florida Declaratory Judgments Act, Chapter 86, Florida Statutes.

52. Florida Statute § 86.011 permits the application for this Court to rule on “any fact upon which the existence or nonexistence of such. . . right does or may depend, whether such. . . right now exists. . . as to the right to a fair election which requires an uncorrupted Voter Roll.

53. The Voter Rolls for the State of Florida including those of Pinellas County and Hillsborough County, in particular, are corrupted in that there needs to be some explanation of how and why there was such a statistically impossible abundance of voters who sought Mail-In Ballots on September 9, 2024. Moreover, the fact that the fraud

detection and prevention program was turned off must be explained. Lastly, and possibly of the greatest significance, the clones which appear in the Voter Rolls in Florida, must be explained and ultimately corrected.

54. The corrupted Voter Rolls of Florida are symptomatic of issues involving the Voter Rolls across the United States, and the corrupted Voter Rolls in Florida must be corrected.

WHEREFORE, the Plaintiff respectfully requests that this Court grant a Final Judgment declaring that the Voter Rolls of Florida are corrupted, and such further and other relief as this Honorable Court may deem just and proper. In regard to Count I, the Plaintiff demands a trial by jury on all issues so triable.

Count II – Writ of Mandamus

55. The Plaintiff avers the allegations of Paragraphs 1 through 49, above, and incorporates them in this Count, as though fully restated herein.

56. The Defendants are responsible to assure that the elections in their various jurisdictions must be fair and transparent.

57. It is their responsibility to investigate and make whatever changes are necessary to assure that the Voter Rolls are not corrupted nor able to be corrupted, and in this regard, the Defendants have failed.

58. Whereby, this Court has the power to order the Defendants to fix and correct the issues with the Voter Rolls which permit corruption and to repair or eliminate the corruption, itself.

WHEREFORE, the Plaintiff respectfully requests that this Court issue a Writ of Mandamus against the Defendants, in their capacities as being agents of the State of

Florida, which requires that they investigate all causes for all issues regarding possible clone voters in the systems, aberrations of huge numbers of Mail-In Ballot requests, which are statistically impossible or almost impossible, and the overriding of all safety precautions on the internet and grant such further and other relief as this Honorable Court may deem just and proper. In regard to Count I, the Plaintiff demands a trial by jury on all issues so triable.

Count III – Pure Bill of Discovery

59. The Plaintiff avers the allegations of Paragraphs 1 through 49, above, and incorporates them in this Count, as though fully restated herein.

60. As there is good reason to suspect that there is some external access to the Voter Rolls and the voting system in Florida, and in particular Pinellas County and Hillsborough County, Florida, the Plaintiff is entitled to invoke the right to discovery of matters concerning the duplication of voters in the Voter Rolls with unique county and/or state Voter ID Numbers, as there seems to have been an unexplained surge of applications for Mail-In Ballots on a single day in Pinellas County and for those who requested Mail-In Ballots on September 9, 2024, and there remains an unanswered question as to how the Fraud Prevention software failed to prevent the sending of ballots to many who did not have proper identification, the Plaintiff has a need to conduct discovery to determine the issues pertaining to the Voter Rolls in Florida including and especially the Voter Rolls of Pinellas County and Hillsborough County, such discovery should proceed.

61. Moreover, where there are issues which are confidential to protect voters, such as not permitting copies of their signatures to be made available to the public, those

signatures, if needed to confirm identities, methodologies or other important information, this Court should enter a confidentiality order to assure that the protections for the public are in place, while the Plaintiff is also not frustrated from being able to find the evidence which will explain the aberrations and the duplications of voters' information in the Voter Rolls of the State of Florida.

WHEREFORE, Plaintiff respectfully requests that this Court to invoke and enforce Rule 1.280 through Rule 1.370 of the Florida Rules of Civil Procedure as to discovery, to enable the Plaintiff to obtain the discovery as to the Voter Rolls of Pinellas County, Hillsborough County, and of the State of Florida as a whole, and to Order the Defendants to provide access to or produce any and all records related to the Voter Rolls and the voting which was done in 2024; and to Issue such further and other relief as this Court may deem just and proper to ensure Plaintiff can obtain the necessary information to protect Father's assets and to determine whether additional legal proceedings are warranted.

