

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDA**

CASE NO.: To be assigned

DIVISION: To be assigned

CHRISTOPHER A. HANSON, individually and as attorney for himself,
and next friend and attorney for his two minor children,

Petitioners,

v.

UNIVERSITY OF FLORIDA BOARD OF TRUSTEES, and
CUSTODIAN OF PUBLIC RECORDS, UNIVERSITY OF FLORIDA,

Respondents.

**VERIFIED PETITION FOR WRIT OF MANDAMUS TO COMPEL COMPLIANCE
WITH CHAPTER 119, FLORIDA STATUTES, AND ARTICLE I, SECTION 24,
FLORIDA CONSTITUTION, AND FOR ATTORNEY’S FEES AND COSTS**

Petitioner, CHRISTOPHER A. HANSON, an attorney licensed in the State of Florida, appearing on his own behalf and as attorney and next friend for his two minor children (collectively, “Petitioners”), petitions this Court for a writ of mandamus and other relief against Respondents, the UNIVERSITY OF FLORIDA BOARD OF TRUSTEES and the CUSTODIAN OF PUBLIC RECORDS for the University of Florida (collectively, “the University” or “UF”), and in support states as follows:

I. INTRODUCTION

1. This is an action to enforce the fundamental right of access to public records guaranteed by Article I, Section 24 of the Florida Constitution and Chapter 119, Florida Statutes. Petitioner submitted a narrowly defined public records request to the University of Florida — a public agency plainly subject to Chapter 119 — seeking records concerning himself and his ongoing litigation involving allegations of significant public corruption across various Circuits and into Tallahassee.
2. The University acknowledged that it located responsive records, then declared the request “complete” while producing little more than Petitioner’s own correspondence back to him, withholding other located records based on its own subjective judgment that they “relate to” persons other than Petitioner. The University further refused to identify any custodian or designee responsible for its responses, providing no certification of a diligent search, and providing no written statement of any statutory exemption and no privilege log.
3. Florida law recognizes no “relevance” or “relation” exemption permitting an agency to withhold non-exempt public records based on its own assessment of whether those records concern the requester. Petitioner gave the University written, statutory pre-suit notice under

Section 119.12(1)(b), Florida Statutes, and a deadline for compliance that has now passed without cure. The University's conduct constitutes a constructive and unlawful denial of access. Petitioner seeks a writ of mandamus compelling compliance, together with the attorney's fees and costs authorized by Sections 119.11 and 119.12, Florida Statutes.

4. Petitioner seeks these records not for any improper purpose, but in connection with ongoing litigation that directly affects the welfare of his two minor children, on whose behalf he also appears as next friend. The University's obstruction of lawful access compounds the harm to Petitioner and his children and frustrates Petitioner's effort to protect their interests.

II. PARTIES

5. Petitioner Christopher A. Hanson is a natural person, a citizen of the State of Florida, and a member of The Florida Bar. As "any person" within the meaning of Article I, Section 24(a) of the Florida Constitution and Section 119.07(1), Florida Statutes, he has a constitutional and statutory right to inspect and copy non-exempt public records of the University of Florida.
6. Petitioners H.G.H., a minor child (age 8), and H.G.H., a minor child (age 6), appear by and through their father and next friend, Christopher A. Hanson. The minor children are identified by initials to protect their privacy. The underlying litigation and dispute to which the requested records at least indirectly relate affects the minor children's welfare, and they have a substantial interest in the records sought.
7. Respondent University of Florida Board of Trustees is the public body that governs the University of Florida, a state university and public agency within the meaning of Section 119.011(2), Florida Statutes. The University and its employees are subject to the public records requirements of Chapter 119 and Article I, Section 24.
8. Respondent Custodian of Public Records, University of Florida, is the official charged with responding to and fulfilling public records requests directed to the University, including the request at issue. Despite repeated written requests, the University has declined to identify by name the individual or legal designee acting as custodian with respect to Petitioner's request.

III. JURISDICTION AND VENUE

9. This Court has jurisdiction under Article V, Section 5(b) of the Florida Constitution and Section 26.012, Florida Statutes, which vest the circuit courts with original jurisdiction to issue writs of mandamus. Section 119.11(1), Florida Statutes, further authorizes and requires an immediate hearing in an action to enforce the right of access to public records.
10. Venue is proper in Alachua County, Florida, because the University of Florida maintains its principal offices and the public records at issue in Alachua County, and the agency action and refusal complained of occurred there.

IV. STATEMENT OF FACTS

11. On March 12, 2026, Petitioner contacted the Brechner Freedom of Information Project within the University of Florida College of Journalism and Communications, including Dr. David Cuillier, seeking information and potential assistance concerning the concealment of public records in Petitioner's pending Florida litigation. Petitioner remains in litigation with the Florida Bar and the 13th Circuit Court relating to allegations of widespread corruption and favoritism in the Florida Bar.

12. During telephone conversations with Dr. David Cuillier, Dr. Cuillier displayed familiarity with aspects of Petitioner's litigation and objectives that Petitioner had not shared with him, supporting the inference that responsive internal University communications concerning Petitioner exist and have not been produced.
13. On March 26, 2026, Petitioner submitted a written public records request to the University's custodian of public records pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution. The University assigned the request reference number W018463-032626. (Ex. A.)
14. The request was directed at records maintained by, sent to, or received by employees within the UF College of Journalism and Communications, specifically including but not limited to the Brechner Freedom of Information Project, Dr. David Cuillier, and Professor Jane Bambauer. The request defined a time frame of December 1, 2024, to the date of fulfillment, and three specific categories of records: (A) Petitioner's own names and contact information; (B) six enumerated case numbers tied to Petitioner's litigation; and (C) a targeted list of keywords, individuals, and subjects connected to those cases.
15. The request expressly covered records stored on personal devices or private email accounts to the extent used by University employees to conduct official University business; requested production in native format or as PDFs; required that any claimed exemption be stated in writing with citation to the specific statutory basis, together with a privilege log identifying the date, author, recipient, and general subject matter of any withheld record; requested a rolling production; and requested a written, itemized estimate of any special service charge under Section 119.07(4)(d), Florida Statutes, before any cost was incurred.
16. The University acknowledged the request. Petitioner followed up regarding status on or about April 22, 2026. On April 23, 2026, the University responded only that the request was "undergoing the legal review." (Exs. B–C.)
17. On May 4, 2026, the University sent correspondence, with attachments, stating that it had "reviewed its files" and "located responsive records," and declaring: "This completes the public records request." The material produced consisted entirely of Petitioner's own prior emails to University personnel, returned to him. (Ex. D.)
18. Also on May 4, 2026, Petitioner sent the University a detailed deficiency letter identifying the inadequacies of the response and providing written notice of his public records request to the agency's custodian, pursuant to Section 119.12(1)(b), Florida Statutes. That letter established a compliance deadline of the close of business on Monday, May 11, 2026. (Ex. E.)
19. On May 8, 2026, the University sent Petitioner an unsigned email stating that it "did locate public records that contain the search term 'Hanson,' which relate to individuals who are not you, but have the same last name," and asking whether Petitioner sought "those public records." (Ex. F.) This was the University's first written confirmation that it had located records and then filtered them out of production based on its own determination of whether the records "relate to" Petitioner.
20. Later on May 8, 2026, Petitioner responded in writing. (Ex. G.) He clarified that his request was not a demand for every University record containing the word "Hanson," but a structured request defined by the three categories above, and that he did not seek records concerning unrelated third parties who happen to share his surname. Petitioner further identified the following unremedied deficiencies: (a) the University's withholding of located records based on a "relevance" or "relation" judgment for which no statutory exemption

exists; (b) the University's repeated refusal, across multiple responses, to identify by name the individual or legal designee processing the request; (c) the absence of any written certification of a complete and diligent search identifying the custodians and locations searched, including personal devices and private email accounts used for University business; (d) the absence of any privilege log identifying records withheld or redacted and the specific statutory exemption claimed for each; and (e) the absence of any production of internal University communications, memoranda, notes, or drafts responsive to the defined categories.

21. The University's written responses have identified only one search term having been run: the bare surname "Hanson." No University communication has addressed or accounted for Category B of the request (the six enumerated case numbers tied to Petitioner's litigation) or Category C (the targeted keywords, individuals, and subjects, including the named attorneys and judges connected to Petitioner's litigation), and the University has never stated whether any search of those categories was performed, what was searched, or whether responsive records exist. The University likewise never addressed the request's express coverage of text messages, Signal or WhatsApp messages, internal memoranda, notes, and draft research or survey data, and never addressed records stored on personal devices or in private email accounts used by University personnel to conduct University business.
22. In that same May 8, 2026 communication, Petitioner advised the University that none of its correspondence operated to pause, reset, or satisfy the request or the five-business-day notice provided under Section 119.12(1)(b), that the compliance deadline remained the close of business on Monday, May 11, 2026, that he continued to prefer an amicable resolution and remained willing to confer with the designated custodian, and that absent meaningful compliance he would treat the University's correspondence as a constructive denial and unlawful refusal to produce public records and would proceed with a petition for writ of mandamus seeking attorney's fees and costs under Sections 119.11 and 119.12, Florida Statutes.
23. The compliance deadline of May 11, 2026, passed without any further response or production from the University. As of the filing of this Petition, the University has not identified its custodian or designee, has not provided any certification of a diligent search, has not produced a privilege log, has not stated any statutory basis for withholding any record, and has not produced the internal University records responsive to the defined categories of the request.
24. Petitioner has exhausted available informal and administrative avenues and has no adequate remedy at law other than this action.

V. LEGAL BASIS FOR RELIEF

25. Article I, Section 24(a) of the Florida Constitution guarantees "every person" the right to inspect or copy any public record made or received in connection with the official business of any public body, officer, or employee of the state. This right is to be liberally construed in favor of access, and any exemption must be strictly and narrowly construed.
26. Chapter 119, Florida Statutes, implements this right as to executive-branch agencies, including state universities such as the University of Florida. Section 119.07(1)(a) requires the custodian of public records to permit inspection and copying at any reasonable time, under reasonable conditions. Section 119.07(1)(d)–(f) requires that, where the custodian contends a record or portion is exempt, the custodian redact only the exempt portion, produce

the remainder, and — upon request — state in writing and with particularity the statutory basis for any exemption or redaction.

27. Florida law recognizes no exemption permitting an agency to withhold non-exempt records based on the agency's own subjective judgment of whether the records "relate to" the requester. A record responsive to a properly framed request must be produced unless a specific statutory exemption applies and is asserted in writing. The University's admission that it located responsive records and then declined to produce them because they "relate to individuals who are not" Petitioner states no lawful basis for withholding.
28. A public agency must produce records within a reasonable time; the only delay permitted is the limited, reasonable time necessary to retrieve the record and redact exempt portions. Unjustified delay or refusal violates Chapter 119. See *Tribune Co. v. Cannella*, 458 So. 2d 1075 (Fla. 1984).
29. The University's declaration that the request was "complete," coupled with its withholding of located records, its failure to assert any statutory exemption, its failure to provide a privilege log, its failure to certify a diligent search, and its refusal to identify a custodian, constitutes a constructive denial and an unlawful refusal of access under Chapter 119 and Article I, Section 24.
30. Mandamus is the appropriate remedy to compel a records custodian to perform the ministerial duty of complying with Chapter 119. To be entitled to mandamus, a petitioner must demonstrate (1) a clear legal right to the relief requested, (2) an indisputable legal duty on the part of the respondent to perform the act, and (3) the absence of any other adequate legal remedy. Petitioner satisfies each element: his right of access is established by the Constitution and statute; the University's duty to produce non-exempt responsive records and to justify any withholding in writing is indisputable; and Petitioner has no adequate alternative remedy.
31. Section 119.11(1), Florida Statutes, entitles Petitioner to an immediate hearing, with this action taking priority over other pending matters.
32. Section 119.12(1), Florida Statutes, requires the court to assess and award reasonable costs of enforcement, including reasonable attorney's fees, against an agency if the court determines that the agency unlawfully refused access rights and the complainant provided written notice identifying the public records request to the agency's custodian at least five business days before filing the civil action. Petitioner provided that written notice on May 4, 2026, more than five business days before the filing of this Petition, and the agency unlawfully refused access. See *Bd. of Trustees, Jacksonville Police & Fire Pension Fund v. Lee*, 189 So. 3d 120 (Fla. 2016).

VI. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

- (a) Issue a peremptory writ of mandamus commanding Respondents to:
 - (i) identify, by name and title, the records custodian and any legal designee responsible for responding to the request;
 - (ii) conduct, and serve on Petitioner, a sworn certification of a complete and diligent search that describes the search methodology, the specific search terms used, and every custodian,

location, system, and repository searched — including University email servers and archives, messaging and collaboration platforms (e.g., Microsoft Teams, Slack), text and SMS messages, Signal and WhatsApp messages, cloud storage, internal memoranda, notes, and draft research or survey data, and any personal devices or private email accounts used by University personnel to conduct University business;

(iii) search for and produce all non-exempt records responsive to each of the three defined categories of the March 26, 2026 request — Category A (Petitioner’s names and contact information), Category B (the six enumerated case numbers), and Category C (the targeted keywords, individuals, and subjects) — and not merely records containing the bare surname “Hanson”;

(iv) produce all responsive records in their native electronic format with metadata intact, or as PDFs, as requested;

(v) for any record or portion withheld or redacted, state in writing the specific statutory exemption relied upon, with citation, and provide a privilege log identifying the date, author, recipient, and subject matter of each withheld record, as required by Section 119.07(1)(f), Florida Statutes; and

(vi) complete the foregoing by a date certain set by the Court;

(b) In the alternative, issue an alternative writ of mandamus directing Respondents to show cause, within twenty (20) days of the issuance of the writ, why a peremptory writ should not issue;

(c) In the further alternative, set an immediate hearing pursuant to Section 119.11(1), Florida Statutes, with this action taking priority over other pending matters;

(d) Order Respondents to preserve, and to refrain from destroying, altering, deleting, or transferring, all records potentially responsive to the request pending resolution of this action;

(e) Conduct an in camera inspection of any record the University contends is exempt, in order to determine the validity of any asserted exemption;

(f) Declare and find that the University unlawfully refused access to public records in violation of Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, and that the University’s withholding of located records on the basis that they “relate to” persons other than Petitioner is unlawful;

(g) Award Petitioner his reasonable costs of enforcement, including reasonable attorney’s fees, pursuant to Sections 119.11(1) and 119.12(1), Florida Statutes;

(h) Retain jurisdiction to enforce the writ and any award; and

(i) Grant such other and further relief as the Court deems just and proper.

VII. VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing Verified Petition for Writ of Mandamus and that the facts stated in it are true and correct to the best of my knowledge and belief. I make this verification individually and in my capacity as attorney and next friend for my two minor children, pursuant to Section 92.525, Florida Statutes.

/s/ Christopher A. Hanson

Christopher A. Hanson

Date: June 3, 2026

Respectfully submitted,

/s/ Christopher A. Hanson

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Petitioner, individually and as attorney and next friend for his two minor children