

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDACASE NUMBER: 01-2026-CA-001794
Circuit Civil Division WCHRISTOPHER A. HANSON, individually and as attorney for himself
and as 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.**PETITIONER'S EXHIBIT LIST FOR THE SEPTEMBER 2, 2026 EVIDENTIARY HEARING**

Petitioner Christopher A. Hanson, self-represented, submits this exhibit list under the Order Setting Evidentiary Hearing Via Zoom entered August 25, 2026, which directs that exhibits be pre-marked for identification using letters. This is a single consolidated list. Page numbers are to Petitioner's paper exhibit set delivered to the Court. Petitioner's motion filed the same day cites these same letters throughout.

Ex.	Document	Pages
A	Petitioner's public records request to the University, March 26, 2026 (Ref. W018463-032626). Verified Petition, App. 3-5.	4-6
B	The University's May 4, 2026 response declaring the request complete, with the 53 pages produced. Verified Petition, App. 12-65.	8-61
C	Petitioner's deficiency letter and section 119.12(1)(b) notice, May 4, 2026. Verified Petition, App. 67-71.	63-67
D	The University's May 8, 2026 question at App. 72, and Petitioner's written response of May 8, 2026, containing at App. 76 the University's May 5 statement that no exemption was applied. Verified Petition, App. 72-80.	69-77
E	Order to Show Cause, entered June 12, 2026.	79-81
F	Respondents' Response to Verified Petition for Writ of Mandamus, with the Affidavit of John Hines. Filing 251907242, July 7, 2026.	83-99
G	Respondents' Motion for Protective Order, Filing 253616687, July 30, 2026, with its Composite Exhibit A (Petitioner's discovery and deposition notices), Exhibit B (Petitioner's appendix pages, re-printed by the University with quoted language highlighted), Exhibit C (the Hines affidavit), and Exhibit D. Respondents' filing, of record; incorporated by reference and relied on in full.	by ref.
H	Exhibit D to Respondents' Motion for Protective Order: the 479 gathered pages, in the University's own three categories as defined at its paragraph 11 and assigned at its paragraph 24. Category (1), pages 1-53, 'responsive public records,' produced May 4, 2026. Category (2), pages 54-302, 'non-responsive public records,' withheld. Category (3), pages 303-479, 'documents which were not public records,' withheld. Of record in Filing 253616687 and incorporated by reference. Reproduced: original page 302 only, the mobile messaging screenshot. Original pages 160 and 288 are not reproduced; they carry non-party personal data Petitioner asks the Court to seal.	101
I	Petitioner's Hearing Exhibit Composite, 21 tabbed sections with cover index, assembling in date order unaltered excerpts of record and University-produced documents. Filing 255482308, August 24, 2026. Sixteen tabs reproduce documents that also appear separately in this set; Tabs 3, 4, 6, 15, and 18 do not appear elsewhere.	103-193
J	Petitioner's discovery served July 13, 2026: interrogatories, requests for admission, and request to produce, with transmittal. Filing 255482220.	195-208
K	The University's July 17, 2026 production for records request W018964-060526, complete: the cover response and all four attachments it transmitted, under the University's own file names, emails_1 (370 pp.), emails_2 (351 pp.), PRR2 (2 pp.), and the Granicus portal action log (9 pp.), each behind a divider naming it. 741 pages. Filing 255904665, August 28, 2026. Respondents' production, of record; incorporated by reference. The pages cited are Exhibit P.	by ref.
L	Petitioner's Notice of Filing Certificates of Non-Appearance and Deposition-Scheduling Correspondence, tabs A through I. Filed August 31, 2026.	210-245
M	Petitioner's July 16, 2026 email to Respondents' counsel memorializing the July 15, 2026 call, including the confirmation that UFIT located 478 pages.	247-251
N	Order entered August 27, 2026 in Hanson v. Thirteenth Judicial Circuit, No. 25-CA-010255 (Fla. 13th Cir.).	253-257
O	Respondents' counsel's August 28, 2026 email stating Respondents' position following the parties' conferral, with the University's proposed stipulations.	259-260
P	Compiled key pages of the University's W018964-060526 processing-file production, with index. Excerpt of Exhibit K.	262-278
Q	Petitioner's April 22, 2026 status follow-up, printed with the University's March 26, 2026 receipt confirmation. Verified Petition, App. 6-9.	280-283
R	The University's April 23, 2026 response to Petitioner: the request is "undergoing the legal review." Verified Petition, App. 10-11.	285-286

EXCERPTED EXHIBITS AND THE COMPLETE DOCUMENTS

Respondents' voluminous filings are incorporated by reference rather than reproduced: Respondents' Motion for Protective Order with its Composite Exhibits A through D (Exhibits G and H), of record within Filing 253616687, and the University's 741-page production (Exhibit K), of record at Filing 255904665. Petitioner relies on each in full, including as to matters concerning those sets as a whole: that exactly one page of Exhibit D bears no category designation, and that no page of it bears a Bates designation. Petitioner will furnish any complete document on the Court's request. See section 90.108, Florida Statutes. One page of Exhibit D is reproduced, at Exhibit H: original page 302, the mobile messaging screenshot, which is an image the Court is asked to examine. Original pages 160 and 288 are deliberately not reproduced; they carry the non-party personal data Petitioner asks the Court to consider sealing. Petitioner reserves the right to supplement this list as to any transcript, order, or production delivered after the date of service.

RESPONDENTS' PROPOSED STIPULATIONS

On August 28, 2026, Respondents proposed four exhibits for stipulation and asked Petitioner for an itemized exhibit list so that Respondents could consider stipulations in return. This list answers that request. Petitioner stipulates to all four: Respondents' No. 1 is Petitioner's Exhibit A; No. 2 is Exhibit B; No. 3 is Exhibit C; and No. 4 is Exhibit D. Petitioner asks Respondents to state their position on Exhibits E through R, each of which is an order of this Court, a document one of the parties filed in this case, a document Respondents produced, or correspondence between the parties, and requests a stipulation to authenticity and admissibility. Petitioner does not ask Respondents to stipulate to the truth of any matter asserted within any document, offers no exhibit for that purpose, and reserves all objections to Respondents' exhibits.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Florida Courts E-Filing Portal on August 31, 2026, which will serve a Notice of Electronic Filing on James W. Kirkconnell, Esq., jameswk@ufl.edu, counsel for Respondents, and on Kimberly LoGiurato, klogiurato@ufl.edu, a designated e-service address for Respondents.

/s/ Christopher A. Hanson
Christopher A. Hanson, Esq.
Florida Bar No. 44094

cahanson77@yahoo.com
727-409-5738
Self-represented Petitioner

EXHIBIT A

Petitioner's public records request, March 26, 2026 (Ref. W018463-032626).
Verified Petition, App. 3-5.

Interior pages carry the Petition Appendix's own label, Exhibit A, and App. numbers.

EXHIBIT A

Public Records Request of March 26, 2026 (Ref. W018463-032626)

Subject: Formal Public Records Request: UF College of Journalism / Brechner Freedom of Information Project

Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- **A. Names and Contact Information:** "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- **B. Specific Case Numbers:** "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- **C. Targeted Keywords, Individuals & Subjects:** "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- **Catch-All & Personal Devices:** This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- **Format:** Please produce all records electronically in their native format or as PDFs.
- **Exemptions & Privilege Log:** If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the

basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production.

Sincerely,

Chris Hanson

Christopher A. Hanson, Esq.

FL Bar #44094

727-409-5738

cahanson77@yahoo.com

EXHIBIT B

The University's May 4, 2026 response declaring the request complete, and the 53 pages produced. Verified Petition, App. 12-65.

Interior pages carry the Petition Appendix's own label, EXHIBIT D, and App. numbers. The controlling designation is Hearing Exhibit B.

EXHIBIT D

University of Florida Response of May 4, 2026 Declaring the Request
“Complete,” and the Records Produced

Public Records Request :: W018463-032626

From: University of Florida Records Support Center (universityofflorida@mycusthelp.net)

To: cahanson77@yahoo.com

Date: Monday, May 4, 2026 at 03:22 PM EDT

Attachments:

[W018463-1.pdf](#)

[W018463-2.pdf](#)

--- Please respond above this line ---



05/04/2026

RE: PUBLIC RECORDS REQUEST of March 26, 2026, Reference # W018463-032626

Dear Chris Hanson,

The University of Florida received a public information request from you on March 26, 2026. Your request mentioned:

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024,

and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

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- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
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I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production."

The University has reviewed its files and has located responsive records to your request. These records have been included in this correspondence.

This completes the public records request.

Sincerely,
University of Florida Public Records Request Center

To monitor the progress or update this request please log into the [Public Records Center](#).

From: cahanson77@yahoo.com
Sent time: 03/12/2026 10:51:13 AM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Subject: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Good morning. I've called and left messages a few times. However, I just noticed that I had your email address wrong. I'm having trouble with the Florida Bar and the 13th Circuit Court concealing records that are obviously not exempt from production. They have confirmed the existence and I've paid for them, but they intentionally concealed and continue to conceal the target records. I have the matter in litigation. I believe there is significant judicial misconduct throughout this matter that demonstrates an apparent two-tier system of justice. I'm really hoping that the Brechner Freedom of Information Project will look at some of this information with an open mind and an understanding that this type of corruption within the judiciary is dangerous and must be investigated. Rather than overwhelm you with attachments, I think it would be more helpful if someone could speak to me about the case and determine if FAF is willing to get involved. Thank you.

Chris Hanson
FL Bar #44094
Phone: 727-409-5738

From: Cuillier, David
Sent time: 03/12/2026 11:57:50 AM
To: cahanson77@yahoo.com; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>
Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

Chris,

Thanks for reaching out. I'm not sure if we are the right people to help – we don't do legal work. We focus on research and education in access to public records (I have a Ph.D., not a J.D., so I can't give legal advice). I'm happy to chat with you, but I wouldn't be able to do so until late next week – I'm organizing a conference that runs Sunday-Tuesday in D.C. and under the gun. But could chat Thursday or Friday next week when I'm back in the office.

Dave

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Thursday, March 12, 2026 10:51 AM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
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Chris Hanson
FL Bar #44094
Phone: 727-409-5738

From: cahanson77@yahoo.com
Sent time: 03/12/2026 12:20:01 PM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Hi Dave! Thanks for the response. I would really appreciate a quick discussion next week. The legal issues are as under control as they can be. What's confusing me more are the trends in public access to records, increasing exemptions, costs, and flat-out non-compliance in many cases. I'd really appreciate a few minutes of your time next week. Whenever you get a chance, please let me know what day/time would work and all put it on my calendar. Have a great conference and be safe!

Chris

On Thursday, March 12, 2026 at 11:57:53 AM EDT, Cuillier, David <cuillierd@ufl.edu> wrote:

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Chris Hanson

FL Bar #44094

Phone: 727-409-5738

From: Cuillier, David
Sent time: 03/12/2026 12:25:11 PM
To: cahanson77@yahoo.com; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>
Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

I'm free next week Thursday 9-1 or Friday 9-12 if any of those times work.

Dave

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Thursday, March 12, 2026 12:20 PM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
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Chris Hanson

FL Bar #44094

Phone: 727-409-5738

From: cahanson77@yahoo.com
Sent time: 03/12/2026 12:41:49 PM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Thanks Dave. I have a conference on my calendar for Thursday the 19th at 10am. You can call my cell - 727-409-5738 then or let me know if you prefer zoom or another application.

Chris

On Thursday, March 12, 2026 at 12:25:15 PM EDT, Cuillier, David <cuillierd@ufl.edu> wrote:

I'm free next week Thursday 9-1 or Friday 9-12 if any of those times work.

Dave

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App 21

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Chris Hanson

FL Bar #44094

Phone: 727-409-5738

From: Cuillier, David
Sent time: 03/12/2026 12:48:29 PM
To: cahanson77@yahoo.com; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>
Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

I can call you then, Chris.

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Thursday, March 12, 2026 12:42 PM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

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Chris Hanson

FL Bar #44094

Phone: 727-409-5738

From: cahanson77@yahoo.com
Sent time: 03/19/2026 10:31:06 AM
To: Cuillier, David <cuillierd@ufl.edu>; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>
Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

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[Sent from Yahoo Mail for iPhone](#)

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FL Bar #44094

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Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

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Chris Hanson

FL Bar #44094

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Sent time: 03/19/2026 11:59:56 AM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
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Ok. Here are the cites for the public records cases:

Hanson v. The Florida Bar, Case No. 2025-CA-002469 (2nd Circuit Court - Leon County) – Mandamus action to compel Florida Bar's compliance with ministerial duties. Defendant include attorneys Alica Gangi, Allie Huston, Richard Courtemanche, and the Florida Bar.

Hanson v. 13th Judicial Circuit, et al. Case No. 25-CA-10255 (Hillsborough County) – The specific defendants for this action include Judge Matthew Felix, Judge Kelly Ayers, Chief Judge Christopher Sabella.

The case against the Florida Bar is going up on appeal. Judge Dempsey intentionally ignored the law, refusing to even allow the hearing. The Jurisdiction and right to the ministerial duties are conclusive. There is no good faith argument to continue concealment. Yet, they have a Greenberg Traurig lawyer they're paying to try and cement the concealment and the corruption. I don't have much confidence in the courts, even the appellate courts to follow the law.

Obviously, you can see how this is an enormous problem for citizens. You have not only the records custodian and the individual agency or circuit concealing records but you have sitting judges actively assisting in the unlawful concealment of records from public access. That's a massive step towards a tyrannical judiciary. Without an effective press, it is a really terrifying thought to understand where this heads.

Regardless there are also pending records requests for the Attorney General and the Governor's office. I asked the attorney general's office many times to investigate the 13th Circuit. Instead of investigating, they're now actively representing the 13th Circuit in their obviously unlawful concealment of records.

If the goal of The Brechner Institute is research, there is a wealth of data here critically relevant to the constitutional rights of Floridians. I will provide you with whatever you need for your research.

Please let me know what you need from me on that. I'm happy to talk more, but your message was pretty clear. I will try those other resources. thank you.

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Phone: 727-409-5738

From: cahanson77@yahoo.com
Sent time: 03/25/2026 11:16:12 AM
To: Cuillier, David <cuillierd@ufl.edu>
Cc: truthoverchaos@outlook.com
Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Dear Dr. Cuillier,

Thank you again for your time and for the referrals in your March 19 email. I have reached out to the Florida First Amendment Foundation, the FSU First Amendment Law Clinic, and the Florida Center for Government Accountability, and I appreciate those suggestions.

I do want to respectfully follow up on two things, and I hope you will receive this in the constructive spirit in which it is intended.

You mentioned the possibility of including my situation in a survey or data review. I want to take you up on that. The active public records litigation I have pending in both the Second District and the 13th/6th Circuit involves what I believe are clear, documented, and intentional violations of Article I, Section 24 of the Florida Constitution and Rule 2.420 — including confirmed existence of records, payment made for those records, and deliberate withholding by the Florida Bar and the 13th Circuit Court. Please let me know what information you need to include this government misconduct in your data and research.

Also, I did more research on Brechner. It appears that our interests are perfectly aligned for the same objectives - constitutional transparency and accountability.

On the subject of Florida government secrecy specifically, you have been outspoken and publicly engaged:

— Just last month, you published a widely syndicated op-ed calling Florida's trend toward blocking public records access "an all-out slide," noting that Florida now charges an average of \$1,623 per public records request and arguing that the state needs independent enforcement of its sunshine laws.

— In July 2025, you publicly criticized the State of Florida for scrubbing contract records for the Alligator Alcatraz detention facility from the public FACTS database, calling it a transparency failure on a project of enormous public interest.

— You have stated publicly that government agencies don't fund records compliance because "why would government officials put a lot of money into something that embarrasses them or exposes them to potential embarrassment?" — which is precisely the dynamic I am exposing in my case, in a dramatic example of government unlawfully thwarting transparency and accountability of officials.

— Your organization's research identified the risk of selective prosecution when records that embarrass government officials are exposed.

— Your own biography notes that you support news organizations in crafting amicus briefs and appeals in public records matters.

With that background, I am left wondering: what is it about my situation — a sitting circuit court and the Florida Bar allegedly withholding confirmed, paid-for records to shield powerful insiders from embarrassment, with active litigation pending — that places it outside the scope of what Brechner engages with? This has become a very emotional issue for me. And if I didn't explain it well, I'm happy to provide additional information.

Please let me know what about my story came across as different from other cases with which Brechner does engage. I can then know whether getting you more info about possible engagement for public comments etc., is worth the time.

Being a dad is the most important thing in the world. To have the Court system attempt to bring a strangerGAL into their lives purely out of retaliation against me (for pursuing public records and accountability) is an incredibly egregious example of government overreach. I would think that my situation would be your "white whale" - perfectly exposing the extent of government non-compliance and malfeasance.

I remain grateful for your time and your referrals. I just want to make sure this opportunity — to document a real, ongoing, well-evidenced example of exactly the patterns your own published research tracks — is not missed. At a minimum, please let me know what you need from me in order to include my cases in your data and research.

Respectfully,

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FL Bar #44094
727-409-5738
cahanson77@yahoo.com

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Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

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You have no interest in reviewing more of the case documents.

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I do want to respectfully follow up on two things, and I hope you will receive this in the constructive spirit in which it is intended.

You mentioned the possibility of including my situation in a survey or data review. I want to take you up on that. The active public records litigation I have pending in both the Second District and the 13th/6th Circuit involves what I believe are clear, documented, and intentional violations of Article I, Section 24 of the Florida Constitution and Rule 2.420 — including confirmed existence of records, payment made for those records, and deliberate withholding by the Florida Bar and the 13th Circuit Court. Please let me know what information you need to include this government misconduct in your data and research.

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On the subject of Florida government secrecy specifically, you have been outspoken and publicly engaged:

— Just last month, you published a widely syndicated op-ed calling Florida's trend toward blocking public records access "an all-out slide," noting that Florida now charges an average of \$1,623 per public records request and arguing that the state needs independent enforcement of its sunshine laws.

— In July 2025, you publicly criticized the State of Florida for scrubbing contract records for the Alligator Alcatraz detention facility from the public FACTS database, calling it a transparency failure on a project of enormous public interest.

— You have stated publicly that government agencies don't fund records compliance because "why would government officials put a lot of money into something that embarrasses them or exposes them to potential embarrassment?" — which is precisely the dynamic I am exposing in my case, in a dramatic example of government unlawfully thwarting transparency and accountability of officials.

— Your organization's research identified the risk of selective prosecution when records that embarrass government officials are exposed.

— Your own biography notes that you support news organizations in crafting amicus briefs and appeals in public records matters.

With that background, I am left wondering: what is it about my situation — a sitting circuit court and the Florida Bar allegedly withholding confirmed, paid-for records to shield powerful insiders from embarrassment, with active litigation pending — that places it outside the scope of what Brechner engages with? This has become a very emotional issue for me. And if I didn't explain it well, I'm happy to provide additional information.

Please let me know what about my story came across as different from other

cases with which Brechner does engage. I can then know whether getting you more info about possible engagement for public comments etc., is worth the time.

Being a dad is the most important thing in the world. To have the Court system attempt to bring a strangerGAL into their lives purely out of retaliation against me (for pursuing public records and accountability) is an incredibly egregious example of government overreach. I would think that my situation would be your "white whale" - perfectly exposing the extent of government non-compliance and malfeasance.

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I understand your frustration and wanting to get off the phone, but I was going to refer you to some other folks who might help, who do connect people to journalists/legal help on these issues :

- [Florida First Amendment Foundation](#) — they deal with FOI and First Amendment issues.
- New [First Amendment law clinic at FSU](#) — their mission is to help people with these problems.
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Hi Dave. Thank you for your time. I was really disappointed with what you had to say. From researching your organization and its mission statement and history, I truly thought that you would help me in this nightmare of state and judicial corruption. There are rampant violations of due process, access to judicial records, and the separation of powers. Its a vast network of powerful and corrupt individuals that only a competent and ethical journalist can hold accountable. As I understand it, you simply cant help and dont know any journalists? You did mention something about doing a survey or a study on my case. Yes, please do that. The case numbers are as follows. Also, you mentioned one other person whom I could contact with university of Florida. Will you please send her contact information over for me? Again, I am very disappointed that the Brechner Freedom of Information Project is not able to assist with getting publicity for this important info about active and intentional public records concealment. The violations here, including judges acting unlawfully to protect the powerful, are certainly harming me and family, and certainly many others who are unable to address the misconduct of these powerful insiders. Where should my family turn? If I misunderstood anything or you have any suggestion for me beyond

contacting your colleague and continuing to reach out to journalist, please let me know. I'll be happy to get you any information you need about the active public records litigation in the second and 13th/6th circuit for the survey or whatever data review you do. Thank you for your time. Chris Hanson 727-409-5738 FI bar 44094

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I can call you then, Chris.

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Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

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[External Email]

Any reason why? Do you support the states actions? Believe records properly withheld? Or theres some mistake in my legal analysis. This is very disappointing. Unless theres some reason for the polar opposite position on my case from Brechners stated mission, this becomes part of the overall analysis regarding rampant judicial corruption and media complicity. Youll find this was a mistake. I assure you that.

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On Wednesday, March 25, 2026 at 12:31:32 PM EDT, Cuillier, David <cuillierd@ufl.edu> wrote:

Chris,

Yes, you appear passionate about the topic, and that is great. Unfortunately, I can't help you with your request in getting reporters to cover your story. I don't do that - I provide research-based context and quotes/columns to them when they reach out to me (the examples you noted). You might be able to get a reporter or one of those groups I provided interested in your situation. I will keep your situation in mind, though, in case future relevant research studies arise.

Best,

Dave

On Mar 25, 2026, at 10:16 ?AM, cahanson77@yahoo.com wrote:

-257 ?

[External Email]

Dear Dr. Cuillier,

Thank you again for your time and for the referrals in your March 19 email. I have reached out to the Florida First Amendment Foundation, the FSU First Amendment Law Clinic, and the Florida Center for Government Accountability, and I appreciate those suggestions.

I do want to respectfully follow up on two things, and I hope you will receive this in the constructive spirit in which it is intended.

You mentioned the possibility of including my situation in a survey or data review. I want to take you up on that. The active public records litigation I have pending in both the Second District and the 13th/6th Circuit involves what I believe are clear, documented, and intentional violations of Article I, Section 24 of the Florida Constitution and Rule 2.420 — including confirmed existence of records, payment made for those records, and deliberate withholding by the Florida Bar and the 13th Circuit Court. Please let me know what information you need to include this government misconduct in your data and research.

Also, I did more research on Brechner. It appears that our interests are perfectly aligned for the same objectives - constitutional transparency and accountability.

On the subject of Florida government secrecy specifically, you have been outspoken and publicly engaged:

— Just last month, you published a widely syndicated op-ed calling Florida's trend toward blocking public records access "an all-out slide," noting that Florida now charges an average of \$1,623 per public records request and

arguing that the state needs independent enforcement of its sunshine laws.

— In July 2025, you publicly criticized the State of Florida for scrubbing contract records for the Alligator Alcatraz detention facility from the public FACTS database, calling it a transparency failure on a project of enormous public interest.

— You have stated publicly that government agencies don't fund records compliance because "why would government officials put a lot of money into something that embarrasses them or exposes them to potential embarrassment?" — which is precisely the dynamic I am exposing in my case, in a dramatic example of government unlawfully thwarting transparency and accountability of officials.

— Your organization's research identified the risk of selective prosecution when records that embarrass government officials are exposed.

— Your own biography notes that you support news organizations in crafting amicus briefs and appeals in public records matters.

With that background, I am left wondering: what is it about my situation — a sitting circuit court and the Florida Bar allegedly withholding confirmed, paid-for records to shield powerful insiders from embarrassment, with active litigation pending — that places it outside the scope of what Brechner engages with? This has become a very emotional issue for me. And if I didn't explain it well, I'm happy to provide additional information.

Please let me know what about my story came across as different from other cases with which Brechner does engage. I can then know whether getting you more info about possible engagement for public comments etc., is worth the time.

Being a dad is the most important thing in the world. To have the Court system attempt to bring a strangerGAL into their lives purely out of retaliation against me (for pursuing public records and accountability) is an incredibly egregious example of government overreach. I would think that my situation would be your "white whale" - perfectly exposing the extent of government non-compliance and malfeasance.

I remain grateful for your time and your referrals. I just want to make sure this opportunity — to document a real, ongoing, well-evidenced example of exactly the patterns your own published research tracks — is not missed. At a minimum, please let me know what you need from me in order to include my cases in your data and research.

Respectfully,

Chris Hanson
FL Bar #44094
727-409-5738
cahanson77@yahoo.com

On Thursday, March 19, 2026 at 10:41:22 AM EDT, Cuillier, David <cuillierd@ufl.edu> wrote:

Sorry to bum you out. As I said, it's not our mission to connect people to journalists — it's just not what we do (nor do we do public statements, amici, etc.). Jane Bambauer, the First Amendment prof also is not tasked with connecting people to journalists — she does research. You can reach out to her if you want: janebambauer@ufl.edu

I understand your frustration and wanting to get off the phone, but I was going to refer you to some other folks who might help, who do connect people to

journalists/legal help on these issues :

- [Florida First Amendment Foundation](#) – they deal with FOI and First Amendment issues.
- New [First Amendment law clinic at FSU](#) – their mission is to help people with these problems.
- [Florida Center for Government Accountability](#) (they have their own publication, the Trident, that writes about these issues)
- ACLU and FIRE sometimes pick up these issues.

Dave

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Thursday, March 19, 2026 10:31 AM

To: Cuillier, David <cuillierd@ufl.edu>; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>

Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Hi Dave. Thank you for your time. I was really disappointed with what you had to say. From researching your organization and its mission statement and history, I truly thought that you would help me in this nightmare of state and judicial corruption. There are rampant violations of due process, access to judicial records, and the separation of powers. Its a vast network of powerful and corrupt individuals that only a competent and ethical journalist can hold accountable. As I understand it, you simply cant help and dont know any journalists? You did mention something about doing a survey or a study on my case. Yes, please do that. The case numbers are as follows. Also, you mentioned one other person whom I could contact with university of Florida. Will you please send her contact information over for me? Again, I am very disappointed that the Brechner Freedom of Information Project is not able to assist with getting publicity for this important info about active and intentional public records concealment. The violations here, including judges acting unlawfully to protect the powerful, are certainly harming me and family, and certainly many others who are unable to address the misconduct of these powerful insiders. Where should my family turn? If I misunderstood anything or you have any suggestion for me beyond contacting your colleague and continuing to reach out to journalist, please let me know. Ill be happy to get you any information you need about the active public records litigation in the second and 13th/6th circuit for the survey or whatever data review you do. Thank you for your time. Chris Hanson 727-409-5738 FI bar 44094

[Sent from Yahoo Mail for iPhone](#)

On Thursday, March 12, 2026, 12:48 PM, Cuillier, David <cuillierd@ufl.edu> wrote:

I can call you then, Chris.

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Thursday, March 12, 2026 12:42 PM

To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>

Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Thanks Dave. I have a conference on my calendar for Thursday the 19th at 10am. You can call my cell - 727-409-5738 then or let me know if you prefer zoom or another application.

Chris

On Thursday, March 12, 2026 at 12:25:15 PM EDT, Cuillier, David
<cuillierd@ufl.edu> wrote:

I'm free next week Thursday 9-1 or Friday 9-12 if any of those times work.

Dave

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Thursday, March 12, 2026 12:20 PM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Hi Dave! Thanks for the response. I would really appreciate a quick discussion next week. The legal issues are as under control as they can be. What's confusing me more are the trends in public access to records, increasing exemptions, costs, and flat-out non-compliance in many cases. I'd really appreciate a few minutes of your time next week. Whenever you get a chance, please let me know what day/time would work and all put it on my calendar. Have a great conference and be safe!

Chris

On Thursday, March 12, 2026 at 11:57:53 AM EDT, Cuillier, David
<cuillierd@ufl.edu> wrote:

Chris,

Thanks for reaching out. I'm not sure if we are the right people to help – we don't do legal work. We focus on research and education in access to public records (I have a Ph.D., not a J.D., so I can't give legal advice). I'm happy to chat with you, but I wouldn't be able to do so until late next week – I'm organizing a conference that runs Sunday-Tuesday in D.C. and under the gun. But could chat Thursday or Friday next week when I'm back in the office.

Dave

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Thursday, March 12, 2026 10:51 AM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Subject: Request for help and/or just for information relating to public

[External Email]

Good morning. I've called and left messages a few times. However, I just noticed that I had your email address wrong. I'm having trouble with the Florida Bar and the 13th Circuit Court concealing records that are obviously not exempt from production. They have confirmed the existence and I've paid for them, but they intentionally concealed and continue to conceal the target records. I have the matter in litigation. I believe there is significant judicial misconduct throughout this matter that demonstrates an apparent two-tier system of justice. I'm really hoping that the Brechner Freedom of Information Project will look at some of this information with an open mind and an understanding that this type of corruption within the judiciary is dangerous and must be investigated. Rather than overwhelm you with attachments, I think it would be more helpful if someone could speak to me about the case and determine if FAF is willing to get involved. Thank you.

Chris Hanson

FL Bar #44094

Phone: 727-409-5738

EXHIBIT C

Petitioner's deficiency letter and section 119.12(1)(b) notice, May 4, 2026. Verified Petition, App. 67-71.

Interior pages carry Petition Appendix App. numbers; the Appendix labels this document Exhibit E.

Re: Public Records Request :: W018463-032626

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: universityofflorida@mycusthelp.net; cuillierd@ufl.edu; truthoverchaos@outlook.com

Date: Monday, May 4, 2026 at 05:03 PM EDT

Good afternoon.

I write regarding Public Records Request W018463-032626, submitted March 26, 2026.

Earlier today, on May 4, 2026, your office produced two PDF attachments (W018463-1.pdf and W018463-2.pdf) consisting solely of email communications that I myself initiated and sent to UF employees. Your cover email stated that "This completes the public records request." I must make it clear that I strongly disagree that closure of this request is appropriate.

The materials sought are critical to numerous other pending cases. The course of events and relevant information I already have make the nature of UF's conduct thus far very concerning. What was the delay in producing communications already within my possession? What type of legal review was necessary on producing what's self-evidently already in my possession?

While I appreciate receipt of those records, this production does **not** constitute a complete or compliant response under Chapter 119, Florida Statutes. There are numerous failures in the response, not the least of which being there is nothing stating whether any documents were withheld. Before this public records request is resolved, I need you all to address these clear deficiencies at a minimum:

1. **No Identification of Custodian/Designee.** My request (and subsequent follow-ups on April 24 and April 30, 2026) expressly demanded the name and direct contact information of the specific individual or legal designee processing the request, as required by §119.07(1)(b), Florida Statutes. No such identification has ever been provided.
2. **No Certification of Complete Search.** There has been no written confirmation that a thorough, good-faith search was conducted of all responsive records maintained by, sent to, or received by the named custodians (Brechtner Freedom of Information Project staff, Dr. David Cuillier, Professor Jane Bambauer, and others in the UF College of Journalism and Communications), including records on personal devices or private email accounts used for university business.

3. **Unexplained “Legal Review” and Lack of Privilege Log.** For weeks your office responded only that the request was “undergoing the legal review,” without identifying any specific statutory exemption under Chapter 119 or the Florida Constitution, without providing a privilege log for any withheld records, and without producing non-exempt records on a rolling basis as I repeatedly requested.
4. **Scope of Production.** The records produced contain no internal UF communications, memoranda, notes, drafts, or other documents responsive to the broad categories I requested (names, case numbers, and keywords appearing in any written communications between December 1, 2024, and the date of fulfillment).

To evaluate compliance with Chapter 119 and Article I, Section 24 of the Florida Constitution, I respectfully demand the following **no later than close of business on Monday, May 11, 2026**:

1. The full name, title, direct email address, and phone number of the individual currently designated as the custodian or designee responsible for this request (§119.07(1)(b), F.S.).
2. Written certification that a complete and diligent search has been performed, identifying the custodians and locations searched.
3. A privilege log (detailed written explanation) specifically identifying any responsive records that were withheld or redacted, including the specific statutory exemption claimed for each.
4. Immediate production of any additional responsive records on a rolling basis, together with a date-certain for final production of any remaining records.

I remind the University of its statutory obligation to respond promptly and in good faith (§119.07(1)(c), F.S.). Unreasonable delay or continued non-compliance may necessitate judicial enforcement under §119.11, F.S., including recovery of attorney’s fees and costs.

Pursuant to Section 119.12(1)(b), Florida Statutes, please consider this correspondence as formal, five (5) business days' written notice of the University's unlawful refusal to fully comply with my public records request.

If I do not receive reasonable answers and supporting materials by the deadline, I will consider your May 4, 2026 correspondence to be a constructive denial and an unlawful refusal to produce public records. I will then proceed with filing a Petition for Writ of Mandamus in the appropriate circuit court and will seek all applicable attorney's fees and costs necessitated by your non-compliance pursuant to §119.11 and §119.12, F.S.

I am available to speak directly with the designated custodian at your earliest convenience and remain willing to resolve this matter cooperatively.

Thank you for your immediate attention.

Sincerely,

Christopher A. Hanson, Esq.
FL Bar #44094
727-409-5738
cahanson77@yahoo.com

On Monday, May 4, 2026 at 03:22:03 PM EDT, University of Florida Records Support Center
<universityofflorida@mycusthelp.net> wrote:

Attachments:

[W018463-1.pdf](#)

[W018463-2.pdf](#)

--- Please respond above this line ---



05/04/2026

RE: PUBLIC RECORDS REQUEST of March 26, 2026, Reference # W018463-032626

Dear Chris Hanson,

The University of Florida received a public information request from you on March 26, 2026.
Your request mentioned:

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I

am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- Format: Please produce all records electronically in their native format or as PDFs.
- Exemptions & Privilege Log: If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production."

The University has reviewed its files and has located responsive records to your request. These records have been included in this correspondence.

This completes the public records request.

Sincerely,
University of Florida Public Records Request Center

To monitor the progress or update this request please log into the [Public Records Center](#).

EXHIBIT D

Petitioner's written response of May 8, 2026, containing the University's May 8 question and, at App. 76, its May 5 statement that no exemption was applied. Verified Petition, App. 72-80.

Interior pages carry the Petition Appendix's own labels, EXHIBIT F and EXHIBIT G, and App. numbers. The controlling designation is Hearing Exhibit D.

EXHIBIT F

University of Florida Email of May 8, 2026 (“Hanson” records “relating to” others)

The full text of this email is reproduced within Exhibit G.

EXHIBIT G

Petitioner's Written Response of May 8, 2026

Re: Public Records Request :: W018463-032626

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: universityofflorida@mycusthelp.net; cuillierd@ufl.edu; truthoverchaos@outlook.com

Date: Friday, May 8, 2026 at 02:05 PM EDT

To Whom It May Concern at the University of Florida Public Records Request Center:

As a preliminary matter, I previously asked that the University respond within this email chain rather than initiating separate, disconnected emails, so that the full record of correspondence would remain in one place and so that each side's communications would be clear. That request has been ignored. Your most recent email, like the one before it, was sent as a stand-alone message, unsigned, with no individual name, title, or direct contact information attached to it.

It's counter-productive to respond in that manner. Here is your email copied here:

"To: me · Fri, May 8 at 1:07 PM

Message Body

--- Please respond above this line ---

Dear Chris Hanson,

The university did locate public records that contain the search term "Hanson," which relate to individuals who are not you, but have the same last name. Do you seek those public records?

Sincerely,

University of Florida Public Records Request Center"

I raise this not as a stylistic complaint but because it is part of a larger and increasingly concerning pattern. The University has now responded to my correspondence three times without identifying any human being responsible for the positions it is taking. No custodian has been named. No designee has been named. No author of any of the University's responses has been named.

Even the simple courtesy of replying within an existing email thread — something that costs the University nothing — has been declined. It is fair to ask why, when the University is asserting legal positions of its own choosing under Chapter 119, it has been unwilling at any point to put a name to those positions. The Public Records Law is built on the premise that public business is the public's business, and that includes knowing which public employee is making the decisions about what will and will not be produced. The Brechner Center's Mission is precisely in line with that Citizen expectation. What is going on here??

Turning to the substance of your most recent email, you ask whether I want public records that contain the search term "Hanson" but "relate to individuals who are not [me]." The answer is no - I don't want all UF communications that contain "Hanson." My March 26, 2026 request was not a request for every record at the University of Florida containing the word "Hanson." It was a structured request defining three specific categories: (A) my own name and personal information; (B) enumerated case numbers tied to my pending litigation; and (C) a targeted list of keywords, individuals, and subjects connected to those cases. I am seeking records responsive to those categories. I am not seeking records about unrelated third parties who happen to share my surname.

Regardless, your latest correspondence further compounds the deficiencies I identified in my May 4, 2026 letter:

First, your email states that the University "did locate public records that contain the search term 'Hanson,' which relate to individuals who are not you." This is the first written confirmation from the University that records were located, reviewed, and then filtered out of the production based on the University's own subjective determination of whether those records "relate to" me.

There is no exemption under Chapter 119, Florida Statutes, or Article I, Section 24 of the Florida Constitution that authorizes a public agency to withhold non-exempt records based on the agency's internal judgment of relevance nor "relation." If the University believes such authority exists, please identify the specific statutory basis in writing.

Otherwise, please confirm whether the University has any records responsive to my public records request even if the University finds that they "relate" to someone else. This must include Internal University communications, memoranda, notes, or drafts referencing the case numbers, individuals, or keywords I identified and produce a privilege log identifying each such record.

Second, as set forth above, the University has now responded to my correspondence three times without identifying, by name, the individual or legal designee processing this request. My request, my April 24 and April 30 follow-ups, and my May 4 deficiency letter have each specifically asked for the name, title, direct email, and phone number of the individual handling this matter. To date, no such information has been provided. Pointing me to a generic webpage is not a substitute for identifying the person responsible for the response. Please provide that information immediately.

Third, the remaining deficiencies identified in my May 4, 2026 letter remain unaddressed: (i) no 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; (ii) no privilege log identifying records withheld or redacted and the specific statutory exemption claimed for each; and (iii) no production of internal University communications, memoranda, notes, or drafts responsive to the categories defined in the request.

Fourth, please be advised that none of the University's recent correspondence — including the May 4 production of my own emails back to me, the subsequent unsigned email asserting general compliance, or the most recent inquiry about unrelated third parties — operates to pause, reset, or satisfy my public records request and the five business days' written notice provided pursuant to Section 119.12(1)(b), Florida Statutes, in my May 4, 2026 letter. That notice period continues to run, and the deadline for full statutory compliance remains the close of business on Monday, May 11, 2026.

I continue to prefer an amicable resolution and remain willing to speak directly with the designated custodian once the University identifies that individual. Absent meaningful compliance by the deadline, I will treat the University's correspondence to date as a constructive denial and unlawful refusal to produce public records, and will proceed with

filing a Petition for Writ of Mandamus in the appropriate circuit court, seeking all applicable attorney's fees and costs pursuant to Sections 119.11 and 119.12, Florida Statutes.

I'm not trying to unnecessarily embarrass anyone with the records. They are critical to some legal work I'm doing. If the University will simply cooperate, I'm willing to discuss terms that might allow any sensitive or embarrassing communications to avoid publicity. My goal remains a fair result in the underlying proceedings and I believe the materials that UF are critical to that.

Thank you for your prompt attention to these matters.

Sincerely,

Christopher A. Hanson, Esq.
FL Bar #44094
727-409-5738
cahanson77@yahoo.com

On Wednesday, May 6, 2026 at 04:31:29 PM EDT, cahanson77@yahoo.com <cahanson77@yahoo.com> wrote:

Good afternoon. I recently received yet another nameless, faceless email trying to avoid compliance with Chapter 119. I continue to have the questions that I outline in the chain below.

Here is the email cut and paste from the one I received yesterday:

"Dear Chris Hanson,

The university is in receipt of the questions regarding your public records request. Please note, the university complies fully with Florida's public records laws. Records custodian information is prominently identified on [UF's Public Records Center website, linked here](#). The university conducted a good faith search for any public records responsive to your request, including reaching out to the employees you identified and to UF IT to conduct email searches. In accordance with the law and normal UF process, all located records incurred a legal review in order to determine responsiveness and the potential exempt nature of information in the records. No exempt information was withheld or redacted from the records responsive to your request, and consequently, no statutory exemptions were cited in UF's response.

We hope this explanation is helpful.

Sincerely,
University of Florida Public Records Request Center"

Your email on its face fails to comply with Chapter 119. It will make it easier moving forward if you simply respond to this email chain so it's clear what each of us is communicating. You have not complied with the Chapter 119 requirements that I describe below. Please respond with appropriate information including the individual(s) responsible for any certifications.

One concern not addressed is that you all removed non-exempt materials from the response without justification. There are certainly other shortcomings to statutory compliance that require further exploration. Accordingly, I will allow the good faith attempts at resolution as long as I'm able to make any progress.

I have never looked to file any lawsuits despite the current volume of relevant litigation. I hope that you will comply with the statutory requirements immediately. If you all comply voluntarily, I am not looking to cause any undue embarrassment. However, these issues cannot go unaddressed.

I hope that we will be able to resolve this amicably. Otherwise, as soon as it becomes feasible after expiration of the statutory notice under 119.12(1)(b) below, I will proceed with filing a petition for writ of certiorari in the Circuit Court. Please let me know your thoughts on additional efforts at compliance at your earliest convenience.

Chris Hanson
FL Bar #44094

On Monday, May 4, 2026 at 05:03:45 PM EDT, cahanson77@yahoo.com <cahanson77@yahoo.com> wrote:

Good afternoon.

I write regarding Public Records Request W018463-032626, submitted March 26, 2026.

Earlier today, on May 4, 2026, your office produced two PDF attachments (W018463-1.pdf and W018463-2.pdf) consisting solely of email communications that I myself initiated and sent to UF employees. Your cover email stated that "This completes the public records request." I must make it clear that I strongly disagree that closure of this request is appropriate.

The materials sought are critical to numerous other pending cases. The course of events and relevant information I already have make the nature of UF's conduct thus far very concerning. What was the delay in producing communications already within my possession? What type of legal review was necessary on producing what's self-evidently already in my possession?

While I appreciate receipt of those records, this production does **not** constitute a complete or compliant response under Chapter 119, Florida Statutes. There are numerous failures in the response, not the least of which being there is nothing stating whether any documents were withheld. Before this public records request is resolved, I need you all to address these clear deficiencies at a minimum:

1. **No Identification of Custodian/Designee.** My request (and subsequent follow-ups on April 24 and April 30, 2026) expressly demanded the name and direct contact information of the specific individual or legal designee processing the request, as required by §119.07(1)(b), Florida Statutes. No such identification has ever been provided.
2. **No Certification of Complete Search.** There has been no written confirmation that a thorough, good-faith search was conducted of all responsive records maintained by, sent to, or received by the named custodians (Brechtner Freedom of Information Project staff, Dr. David Cuillier, Professor Jane Bambauer, and others in the UF College of Journalism and Communications), including records on personal devices or private email accounts used for university business.

3. **Unexplained “Legal Review” and Lack of Privilege Log.** For weeks your office responded only that the request was “undergoing the legal review,” without identifying any specific statutory exemption under Chapter 119 or the Florida Constitution, without providing a privilege log for any withheld records, and without producing non-exempt records on a rolling basis as I repeatedly requested.
4. **Scope of Production.** The records produced contain no internal UF communications, memoranda, notes, drafts, or other documents responsive to the broad categories I requested (names, case numbers, and keywords appearing in any written communications between December 1, 2024, and the date of fulfillment).

To evaluate compliance with Chapter 119 and Article I, Section 24 of the Florida Constitution, I respectfully demand the following **no later than close of business on Monday, May 11, 2026**:

1. The full name, title, direct email address, and phone number of the individual currently designated as the custodian or designee responsible for this request (§119.07(1)(b), F.S.).
2. Written certification that a complete and diligent search has been performed, identifying the custodians and locations searched.
3. A privilege log (detailed written explanation) specifically identifying any responsive records that were withheld or redacted, including the specific statutory exemption claimed for each.
4. Immediate production of any additional responsive records on a rolling basis, together with a date-certain for final production of any remaining records.

I remind the University of its statutory obligation to respond promptly and in good faith (§119.07(1)(c), F.S.). Unreasonable delay or continued non-compliance may necessitate judicial enforcement under §119.11, F.S., including recovery of attorney’s fees and costs.

Pursuant to Section 119.12(1)(b), Florida Statutes, please consider this correspondence as formal, five (5) business days’ written notice of the University’s unlawful refusal to fully comply with my public records request.

If I do not receive reasonable answers and supporting materials by the deadline, I will consider your May 4, 2026 correspondence to be a constructive denial and an unlawful refusal to produce public records. I will then proceed with filing a Petition for Writ of Mandamus in the appropriate circuit court and will seek all applicable attorney’s fees and costs necessitated by your non-compliance pursuant to §119.11 and §119.12, F.S.

I am available to speak directly with the designated custodian at your earliest convenience and remain willing to resolve this matter cooperatively.

Thank you for your immediate attention.

Sincerely,

Christopher A. Hanson, Esq.
FL Bar #44094
727-409-5738
cahanson77@yahoo.com

On Monday, May 4, 2026 at 03:22:03 PM EDT, University of Florida Records Support Center <universityoflora@mycusthelp.net> wrote:

Attachments:

[W018463-1.pdf](#)

[W018463-2.pdf](#)

--- Please respond above this line ---



05/04/2026

RE: PUBLIC RECORDS REQUEST of March 26, 2026, Reference # W018463-032626

Dear Chris Hanson,

The University of Florida received a public information request from you on March 26, 2026. Your request mentioned:

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus",

"surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- Format: Please produce all records electronically in their native format or as PDFs.
- Exemptions & Privilege Log: If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production."

The University has reviewed its files and has located responsive records to your request. These records have been included in this correspondence.

This completes the public records request.

Sincerely,
University of Florida Public Records Request Center

To monitor the progress or update this request please log into the [Public Records Center](#).

EXHIBIT E

Order to Show Cause, entered June 12, 2026.

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

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

vs.

Case No.: 01-2026-CA-1794

**UNIVERSITY OF FLORIDA BOARD
OF TRUSTEES, and CUSTODIAN
OF PUBLIC RECORDS, UNIVERSITY
OF FLORIDA,
*Respondents.***

ORDER TO SHOW CAUSE

Before the court is a “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,” filed June 4, 2026. Petitioners allege that Respondents have withheld non-exempt records responsive to Petitioner’s public records request. Petitioners seek to enforce their right of access to public records. The Court has reviewed the petition and finds it is facially sufficient.

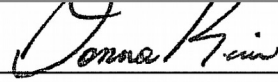
It is therefore **ORDERED**:

1. Petitioners shall serve a copy of this order, along with the petition and the standing civil case management order [Administrative Order No. 3.09], on Respondents in the manner prescribed by law.
2. Respondents shall have twenty (20) days from the date of service in which to show cause in writing why a peremptory writ should not issue. Such response should include the factual and legal basis and address all issues contained in the petition.

3. Upon the filing of the response, Petitioners shall have seven (7) days in which to file a reply, should they so choose.

DONE and ORDERED on Friday, June 12, 2026.

01-2026-CA-001794 06/12/2026 01:47:41 PM

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

Donna M. Keim, Circuit Judge
01-2026-CA-001794 06/12/2026 01:47:41 PM

Certificate of Service

A copy of the foregoing order was served on Friday, June 12, 2026, to the following:

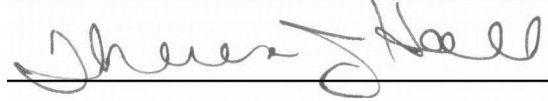
CHRISTOPHER A. HANSON, ESQ.

cahanson77@yahoo.com

truthoverchaos@outlook.com

christophhanson77@gmail.com

01-2026-CA-001794 06/12/2026 01:48:56 PM

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

Theresa Hall, Judicial Assistant

01-2026-CA-001794 06/12/2026 01:48:56 PM

EXHIBIT F

Respondents' Response to Verified Petition for Writ of Mandamus, with the Affidavit of John Hines. Filing 251907242, July 7, 2026.

Contains the Affidavit of John Hines, which the Response labels its Exhibit A.

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

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

v.

Case No.: 01-2026-CA-001794

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

**RESPONSE TO 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**

COMES NOW, the Respondent, University of Florida Board of Trustees, a public body corporate of the State of Florida, et al. (the "University"), by and through counsel, and files this Response to *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* (the "Petition") in the above-styled cause of action.

I. Introduction

This case is simple. Petitioner asked for public records about himself, and the University produced the requested records to Petitioner. Nonetheless, Petitioner is convinced, despite a complete lack of evidence, that the University has wrongfully withheld or redacted records.

As will be explained below, the University performed its ministerial duty in responding to Petitioner's records request in good faith and in full compliance with Florida law. Petitioner has

made no showing, aside from factual assumptions and bare legal conclusions, that the University has done anything but comply with the law. Petitioner now demands a certification of diligent search and a privilege log from the University, but Chapter 119, Florida Statutes, does not require such measures. He also alleges that the University concealed its records custodian, even though that information is publicly available online.

II. Statement of the Case and Facts

On March 26, 2026, Petitioner submitted a public records request for “public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.”

Petitioner further specified:

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- **A. Names and Contact Information:** "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"

- **B. Specific Case Numbers:** "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681 ", "2D2026-0279"

- **C. Targeted Keywords, Individuals & Subjects:** "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

The University's Director of Public Records, John Hines,¹ ensured that the request was entered into the public records request portal, and an acknowledgement and reference number (W018463-032626) were sent promptly to Petitioner. (Aff. ¶¶ 2, 4).² On March 30, 2026, Director Hines sent the search parameters of Petitioner's request to the University's IT department ("UFIT"), as well as to Dr. Cuillier and Professor Bambauer. (Aff. ¶ 5).

Director Hines, who also serves as the University's records custodian,³ then began the process of collecting documents in response to Petitioner's request; he did not limit his efforts to email, but sought any and all records, as described by § 119.011(12), Fla. Stat. (2026),⁴ that met Petitioner's search criteria. (Aff. ¶ 6). Dr. Cuillier and Professor Bambauer duly sent Director Hines their email correspondence with Petitioner. (Aff. ¶ 6). UFIT, using the terms identified in Petitioner's request, identified over 470 pages of documents,⁵ including the correspondence between Petitioner and UF faculty. (Aff. ¶ 6).

During this period, Director Hines worked with UFIT and the University's legal department to parse through the 470+ pages. (Aff. ¶ 7) Of these, some records did not meet the statutory definition of public records, while others concerned individuals having the surname Hanson, but with no relation to Petitioner. (Aff. ¶ 7). Having completed the review and identified responsive documents, on May 4, 2026, Director Hines delivered the documents to Petitioner, stating: "The University has reviewed its files and has located responsive records to your request. These records

¹ See <https://generalcounsel.ufl.edu/attorneys-and-staff/staff/john-hines/>.

² See *Affidavit of University of Florida Records Custodian in Support of Response to Verified Petition for Writ of Mandamus*, attached as Exhibit A and referred to in this response as "(Aff. ¶ ____)."

³ See publicrecords.ufl.edu.

⁴ All statutory references shall be to Florida Statutes (2026).

⁵ These documents will be provided to the Court upon request for an *in camera* review.

have been included in this correspondence. This completes the public records request.” (Aff. ¶ 8), (App. 13-15).⁶

Petitioner responded by immediately demanding four things: (1) the name of the University’s records custodian, (2) a written certification of diligent search, (3) a privilege log, and (4) more documents. (App. 68). In response, on May 5, 2026, Director Hines offered the following explanation:

The university is in receipt of the questions regarding your public records request. Please note, the university complies fully with Florida’s public records laws. Records custodian information is prominently identified on UF’s Public Records Center website, linked here.^[7] The university conducted a good faith search for any public records responsive to your request, including reaching out to the employees you identified and to UF IT to conduct email searches. In accordance with the law and normal UF process, all located records incurred a legal review in order to determine responsiveness and the potential exempt nature of information in the records. No exempt information was withheld or redacted from the records responsive to your request, and consequently, no statutory exemptions were cited in UF’s response.

We hope this explanation is helpful. (App. 76).

Petitioner did not find the explanation helpful, and he responded at length explaining why. (App. 76-77). On May 8, 2026, Director Hines asked for clarification on whether Petitioner wanted records that did not appear responsive as they related to different individuals with the last name “Hanson.” (App. 74). Petitioner declined the offer of records that did not relate to him directly: “I am not seeking records about unrelated third parties who happen to share my surname.” (App. 75). The University made no further production, nor did the University submit a certification of diligent search or a privilege log. Petitioner filed his Petition on June 4, 2026.

⁶ References to Petitioner’s Appendix (i.e., Petitioner’s *Notice of Filing Appendix A-G to Verified Petition for Writ of Mandamus*) are denoted in this response as “(App. ____).”

⁷ As discussed in greater detail below, the embedded link reaches this website: publicrecords.ufl.edu.

III. The University Produced All Public Records Responsive to Petitioner's Request

As noted above, the University has already produced all the public records responsive to Petitioner's request. To the extent that Petitioner believes that he did not receive all the public records responsive to his request, that belief is based on unsupported speculation. "A party petitioning for a writ of mandamus must establish a clear legal right to performance of the act requested, an indisputable legal duty, and no adequate remedy at law." *Chandler v. City Of Greenacres*, 140 So. 3d 1080, 1083 (Fla. 4th DCA 2014) (citation omitted). "[O]nce an alternative writ has issued, the burden is on the respondent to come forth with facts upon which it refused to perform its legal duty." *Id.* As the record shows, along with the Affidavit of John Hines, Petitioner cannot establish any legal right to the relief he has requested nor an indisputable legal duty of the University to provide anything more than the public records that have already been produced.

a. Petitioner Declined the Records he Now Seeks through Mandamus

The University reasonably interpreted Petitioner's request for "public records related to myself" as not including public records related to other individuals named "Hanson." Out of an abundance of caution, the University asked Petitioner to clarify whether his request included such documents, and Petitioner affirmed the University's interpretation. (App. 74). As Petitioner unequivocally explained:

The answer is no - I don't want all UF communications that contain "Hanson." My March 26, 2026 request was not a request for every record at the University of Florida containing the word "Hanson."

I am not seeking records about unrelated third parties who happen to share my surname. (App. 76).

Accordingly, the University did not produce “records about unrelated third parties who happen to share [Petitioner’s] surname.” The University did not cite an exemption for these records, because no exemption is necessary for records that are not responsive to a request. Petitioner did not ask for them and said he did not want them.

Petitioner now takes great issue with the terms “related” and “unrelated.” The University used the term “relate” to describe documents that contained the word “Hanson” but which did not refer to Petitioner. (App. 74). Petitioner used the same terminology (i.e., “unrelated”) in his email to Director Hines (App. 75) and in his Petition: “he did not seek records concerning unrelated third parties who happen to share his surname.” (pg. 3, ¶ 20 (emphasis added).) Thus, despite agreeing with the University that such records were “unrelated” to him, Petitioner now asserts that the University improperly used its subjective judgment to deem these records “unrelated” without justification. (See Petition, pg. 5, ¶ 27).⁸ This is an inaccurate characterization of what occurred.

Although Petitioner included “Hanson” as one of the search terms he wanted the University to use, his request broadly specified that he was seeking “public records related to myself.” The University reasonably interpreted his request to exclude any records that were identified when the University searched using the term “Hanson” but which related to a different individual with that last name. This was not a violation of the public records law, but a fulfillment of the University’s obligation to identify those public records Petitioner requested. Plaintiff’s semantic argument about the use of the term “relate” does not change the fact that the University has already produced all responsive documents.

⁸ Paragraph 27 states, with emphasis added: “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.”

b. Some Records are not *Public* Records

Moreover, a public records request only applies to public records. As the Court will observe if it undertakes an *in camera* review, some documents that matched Petitioner’s search criteria did not meet the definition of a public record. Section 119.011(12) defines a public record as a document “made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.” This means “any material prepared in connection with official agency business which is intended to perpetuate, communicate, or formalize knowledge of some type.” *Shevin v. Byron, Harless, Schaffer, Reid & Associates, Inc.*, 379 So. 2d 633, 640 (Fla. 1980).

“Both article I, section 24 and chapter 119 specify that public records are those records that are in some way connected to ‘official business.’” *State v. City of Clearwater*, 863 So. 2d 149, 152 (Fla. 2003). Moreover, “[t]he Florida Supreme Court has repeatedly rejected the notion that almost everything generated or received by a public agency is a public record.” *Bent v. State*, 46 So. 3d 1047, 1049 (Fla. 4th DCA 2010) (internal quotes omitted). “It cannot merely be the placement of the e-mails on the City’s computer system that makes the e-mails public records.” *State v. City of Clearwater*, 863 So. 2d 149, 154 (Fla. 2003).

Instead, emails are public records only if “prepared in connection with official agency business and [] intended to perpetuate, communicate, or formalize knowledge of some type.” *State v. City of Clearwater*, 863 So. 2d 149, 154 (Fla. 2003) (internal quotes omitted). No exemptions apply to such materials, because public records exemptions only apply to public records. *See* § 119.07(1)(e) (“If the person who has custody of a *public record* contends that all or part of the record is exempt from inspection and copying, he or she shall state the basis of the exemption...” (emphasis added)). Accordingly, the University did not produce such records to Petitioner.

IV. Florida Law Does Not Require Certification of Diligent Search or a Privilege Log

Chapter 119 requires that an agency locate and produce requested public records in good faith. *See* § 119.07(1)(c).⁹ This means “making reasonable efforts to determine from other officers or employees within the agency whether such a record exists and, if so, the location at which the record can be accessed.” *Id.* As explained above, the University’s records custodian met these criteria when responding to Petitioner’s request.

Nowhere does Chapter 119 require that a state agency certify to a requestor that it has made a diligent search for records, nor is there any requirement that a state agency produce a privilege log. Though Florida’s Public Records Act is liberally construed, Florida courts have repeatedly rejected attempts to expand a state agency’s obligations beyond statutory requirements. It is therefore not surprising that Petitioner cites no legal authority for his arguments on these points, because there is none.

a. Certification of Diligent Search

Since there is nothing in Chapter 119 that requires an agency to certify a diligent search for records, there is no right for this court to enforce through the Petition. “Florida law is well settled that mandamus may be used only to enforce a right that is both clear and certain.” *Florida League of Cities v. Smith*, 607 So. 2d 397, 400 (Fla. 1992). “Mandamus may not be used to establish the existence of such a right, but only to enforce a right already clearly and certainly established in the law.” *Id.*

⁹ “A custodian of public records and his or her designee must acknowledge requests to inspect or copy records promptly and respond to such requests *in good faith*.” Fla. Stat. § 119.07 (2026) (emphasis added). There is no requirement that the custodian provide a written certification that it is responding “in good faith.”

Since there is no clear right to a certification of diligent search, Petitioner’s demand for one is without merit. The University respectfully requests that the Court reject Petitioner’s overture to use mandamus to create a right where none now exists. *See Jones v. Miami Herald Media Co.*, 198 So. 3d 1143, 1145 (Fla. 1st DCA 2016) (stating that the principle of liberal construction of the Public Records Act “does not give the courts free rein to engraft their policy judgments into the Act, nor does it authorize the courts to expand the requirements of the Act beyond its plain language.” (internal citations omitted)).

b. Privilege Log

Petitioner’s demand for a privilege log is also unsupported. The University did not redact any information in its production to Petitioner or withhold any documents on the basis of a privilege. Even if the University had an affirmative obligation to itemize its redactions, which it does not, in the instant case the issue is moot. All of the records responsive to Petitioner’s request were produced in their entirety.

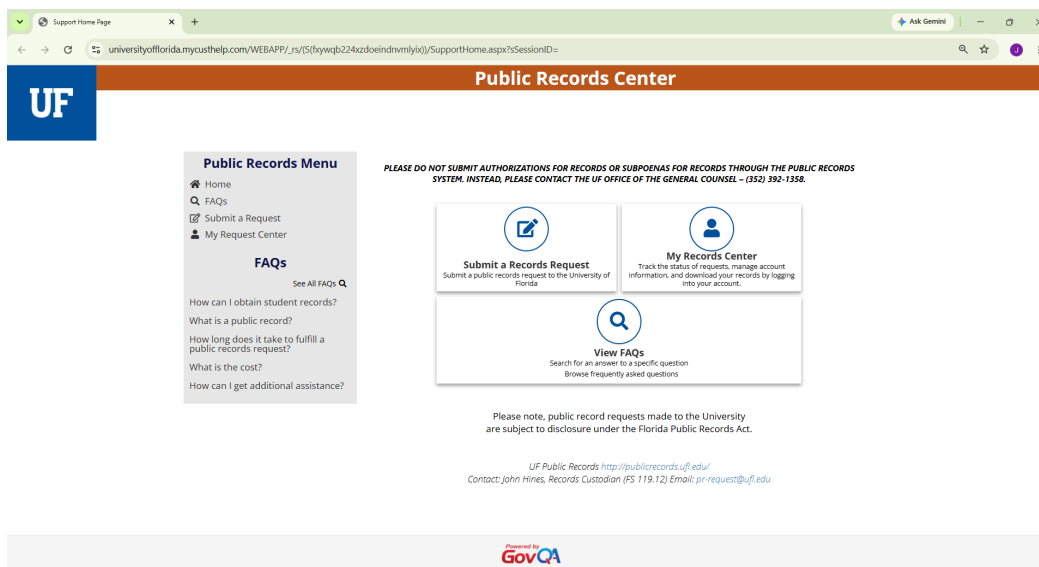
In any event, a privilege log, which is most commonly associated with civil litigation discovery, is a list of itemized documents withheld from production. Similar to a certification of diligent search, discussed previously, a privilege log is not mentioned in Chapter 119, nor is it recognized as part of the public records request process. Furthermore, Florida courts reject expanding Chapter 119 to require a state agency to itemize its redactions. “[T]he Public Records Act does not require agencies to specifically identify the statutory exemption relied upon for each redaction on a redaction-by-redaction basis.” *Jones v. Miami Herald Media Co.*, 198 So. 3d 1143, 1145 (Fla. 1st DCA 2016); *see also Dettelbach v. Dep’t of Bus. & Prof’l Regulation*, 261 So. 3d 676, 683 (Fla. 1st DCA 2018) (“Contrary to Appellant’s assertion, there is nothing in the statute

that expressly requires the Department to identify each document that it asserts is exempt under the Public Records Act.”).

“Thus, section 119.07(1)(e) plainly requires only record-by-record—not redaction-by-redaction—identification of the exemptions authorizing the redactions in each record.” *Jones v. Miami Herald Media Co.*, 198 So. 3d 1143, 1146 (Fla. 1st DCA 2016). “The merit of imposing a duty on the Department to identify each document in a record that it asserts to be exempt under the Act—similar to the generation of a privilege log in response to a civil discovery request—is a matter properly addressed to the legislature rather than this court.” *Dettelbach v. Dep’t of Bus. & Prof’l Regulation*, 261 So. 3d 676, 683 (Fla. 1st DCA 2018). Therefore, the University has no obligation to produce a privilege log to Petitioner.

V. The University Properly Identified its Records Custodian

Following the University’s production of his requested documents, Petitioner demanded that the University identify its records custodian. (App. 67). On May 5, 2026, the University’s records custodian directed Petitioner to the University’s public records website, via hyperlink. (App. 76). The corresponding website looks like this:



The University's Records Custodian is identified at the bottom-center of the page:¹⁰

*UF Public Records <http://publicrecords.ufl.edu/>
Contact: John Hines, Records Custodian (FS 119.12) Email: pr-request@ufl.edu*

The website FAQ's also identify Director Hines as "Records Custodian" for a second time:¹¹

What is the custodian contact information for public records requests at the University of Florida?

UF Public Records <https://publicrecords.ufl.edu/> Contact: John Hines Records Custodian (FS...

Clicking the link leads to a third location where the records custodian is again identified as Director Hines:¹²

[<< Back to Search Results](#)

Question:

What is the custodian contact information for public records requests at the University of Florida?

Answer:

UF Public Records

<https://publicrecords.ufl.edu/>

Contact: John Hines

Records Custodian (FS 119.12)

Email: pr-request@ufl.edu

Office: (352) 392-1358

¹⁰ See (Aff. ¶ 3).

¹¹ See [https://universityofflorida.mycusthelp.com/WEBAPP/rs/\(S\(vu5mtn3s2nldrynumqvzg5f1\)\)/FindAnswers.aspx](https://universityofflorida.mycusthelp.com/WEBAPP/rs/(S(vu5mtn3s2nldrynumqvzg5f1))/FindAnswers.aspx).

¹² See [https://universityofflorida.mycusthelp.com/WEBAPP/rs/\(S\(vu5mtn3s2nldrynumqvzg5f1\)\)/AnswerDetail.aspx?sSessionID=&inc=3483&caller=%7e%2fFindAnswers.aspx%3ffilter%3d%26pi%3d1%26sSessionid%3d](https://universityofflorida.mycusthelp.com/WEBAPP/rs/(S(vu5mtn3s2nldrynumqvzg5f1))/AnswerDetail.aspx?sSessionID=&inc=3483&caller=%7e%2fFindAnswers.aspx%3ffilter%3d%26pi%3d1%26sSessionid%3d).

It may be that Petitioner did not read the website very closely, as he responded: “Pointing me to a generic webpage is not a substitute for identifying the person responsible for the response.” (App. 75). On the contrary, it is not a substitute at all—the “generic webpage” explicitly and prominently identifies the University’s records custodian, or in Petitioner’s words, “the person responsible for the response.” (App. 75). Nothing further is required by law. *See* §§ 119.07(1),¹³ 119.12(2).

In short, the University identifies Director Hines as its records custodian prominently in at least three instances on its public records website. Petitioner admits that the University gave him the link to the main site. (App. 75). That webpage in turn includes a link to the FAQ information excerpted above, reiterating the identity of Director Hines as the University’s records custodian. As a consequence, Petitioner’s allegation that the University concealed or refused to provide the identity its records custodian is factually wrong.

Furthermore, Petitioner’s own legal arguments raise questions about the sincerity of his claims on this issue, specifically as it relates to providing notice to the University. To understand this inconsistency, consider § 119.12, which generally addresses attorney fees in civil actions related to enforcement of Chapter 119.

Section 119.12(1)(b) says that, in order to recover fees, a petitioner must provide notice of a records request to an agency’s records custodian before filing an action. In other words, notice is an element of the cause of action (or at least a claim for attorney fees). However, there is an exception to this rule under § 119.12(2), which says that notice to the custodian under (1)(b) only

¹³ Section 119.07 never expressly requires that an agency identify its custodian in the first instance, only that the custodian identify his or her designee when permitting another officer or employee to inspect records. Nonetheless, the import of the statute, in conjunction with § 119.12(1)(b), suggests that the custodian should be identified, which UF does through its freely accessible public records website.

applies if the agency “does not prominently post the contact information for the agency’s custodian of public records...on the agency’s website[.]” As already demonstrated, the University prominently displays such contact information on its website—in no less than three instances.

Tellingly, Petitioner acknowledges this in paragraphs 18, 22, and 32 of the Petition when he describes providing notice to the University’s records custodian pursuant to § 119.12(1)(b).¹⁴ (See App. 66). This means, unequivocally, that Petitioner believed he was communicating with the University’s records custodian—at least that’s what he swears in his verified Petition.¹⁵ Nonetheless, Petitioner again and again insists that the University failed to identify its custodian. See, e.g., paragraphs 2, 8, 23, and 29 of the Petition.

Here is the rub: if Petitioner genuinely believed that “a generic webpage” did not identify the University’s records custodian (App. 75), then Petitioner must cite § 119.12(2), because that subsection applies precisely when the custodian’s contact details are not “prominently displayed...on the agency’s website.” Yet Petitioner repeatedly claims to have notified the custodian under § 119.07(1)(b). Those claims can only be true if Director Hines is in fact identified by the University on its website as its records custodian.

In other words, the records custodian issue is a red herring and negated by Petitioner’s own pleading. His allegation that the custodian was not identified cannot be true so long as he claims to have notified the custodian under § 119.07(1)(b). Petitioner knows perfectly well who the University’s records custodian is because he is relying on that knowledge to support an essential element of his claim.

¹⁴ See, e.g., Petition, pg. 3, ¶ 18: “Also on May 4, 2026, Petitioner sent the University a detailed deficiency letter...providing written notice of his public records request to the agency’s custodian, pursuant to Section 119.12(1)(b), Florida Statutes.” (emphasis added).

¹⁵ See Petition, pg. 7: “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.”

VI. Conclusion

Petitioner seeks extraordinary mandamus relief based not on evidence, but on speculation. Petitioner is not entitled to any of the relief that he sets forth in his Petition. The facts show that the University received and promptly acknowledged Petitioner's request, conducted a good-faith search, consulted the personnel and systems reasonably likely to possess responsive records, reviewed the results for responsiveness, and produced the public records responsive to Petitioner's request without redaction. The University did not withhold records that Petitioner was entitled to receive; indeed, Petitioner expressly declined certain records he now places at issue. Furthermore, Chapter 119 does not require the University to provide a certification of diligent search or a privilege log, and Petitioner cites no authority establishing a clear legal right to either form of relief. Finally, the record conclusively demonstrates that the University's records custodian was prominently identified and readily accessible through the University's public records website. Because Petitioner cannot establish a clear legal right, a corresponding ministerial duty, or any failure by the University to comply with Florida law, the Petition should be denied.

Respectfully submitted,

/s/ James W. Kirkconnell

James W. Kirkconnell, Esq.

Florida Bar No.: 0021044

123 Tigert Hall

PO Box 113125

Gainesville, FL 32611-3125

(352) 392-1358

(352) 392-4387 Facsimile

jameswk@ufl.edu

Attorney for the University of Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the undersigned counsel electronically filed the foregoing using the Florida Courts E-Filing Portal, which will generate a Notice of Electronic Filing to Petitioner(s) at their designated email address(es) on this 7th day of July, 2026.

/s/ James W. Kirkconnell
James W. Kirkconnell, Esq.

Exhibit A

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

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

v.

Case No.: 01-2026-CA-001794

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

Respondents.

AFFIDAVIT OF UNIVERSITY OF FLORIDA RECORDS CUSTODIAN IN SUPPORT OF RESPONSE TO VERIFIED PETITION FOR WRIT OF MANDAMUS

STATE OF FLORIDA
COUNTY OF ALACHUA

I, John Hines, do affirm and state as follows:

1. My name is John Hines. I am at least eighteen (18) years old and I am a resident of Alachua County, Florida. I have personal knowledge of all facts stated herein and affirm that they are true and correct to the best of my knowledge.
2. I am Director of Public Records for the University of Florida (“University”), and I am the records custodian for the University. I am responsible for the operational management and administrative direction of the University’s public records functions and services.
3. The University prominently displays my role as records custodian on its public records website, which can be found at <http://publicrecords.ufl.edu/>.

Exhibit A

4. On March 26, 2026, the University received Petitioner Christopher Hanson's public records request. The request was entered into the public records request portal and an acknowledgement and reference number (W018463-032626) were sent to the Petitioner.
5. On March 30, 2026, I sent the search parameters of Petitioner's request to the University's IT department ("UFIT"), as well as to faculty members Dr. David Cuillier and Professor Jane Bambauer.
6. I began the process of collecting documents in response to Petitioner's request, including any and all records meeting Petitioner's search criteria. Dr. Cuillier and Dr. Bambauer sent me records that consisted of email correspondence with Petitioner. UFIT, using the terms identified in Petitioner's request, gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty.
7. I worked with UFIT and UF's legal department to parse through the 470+ pages. Of these, some records did not meet the definition of public records, while others concerned individuals having the surname Hanson, but with no relation to the Petitioner.
8. On May 4, 2026, I delivered the responsive public records to Petitioner.

FURTHER AFFIANT SAYETH NAUGHT.

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

/s/ John Hines
John Hines

EXHIBIT H

Exhibit D to Respondents' Motion for Protective Order, the 479 gathered pages. Incorporated by reference; of record within Filing 253616687.

Reproduced here: original page 302 only, the mobile messaging screenshot.

Original pages 160 and 288 are deliberately not reproduced; they carry non-party personal data that Petitioner asks the Court to seal.

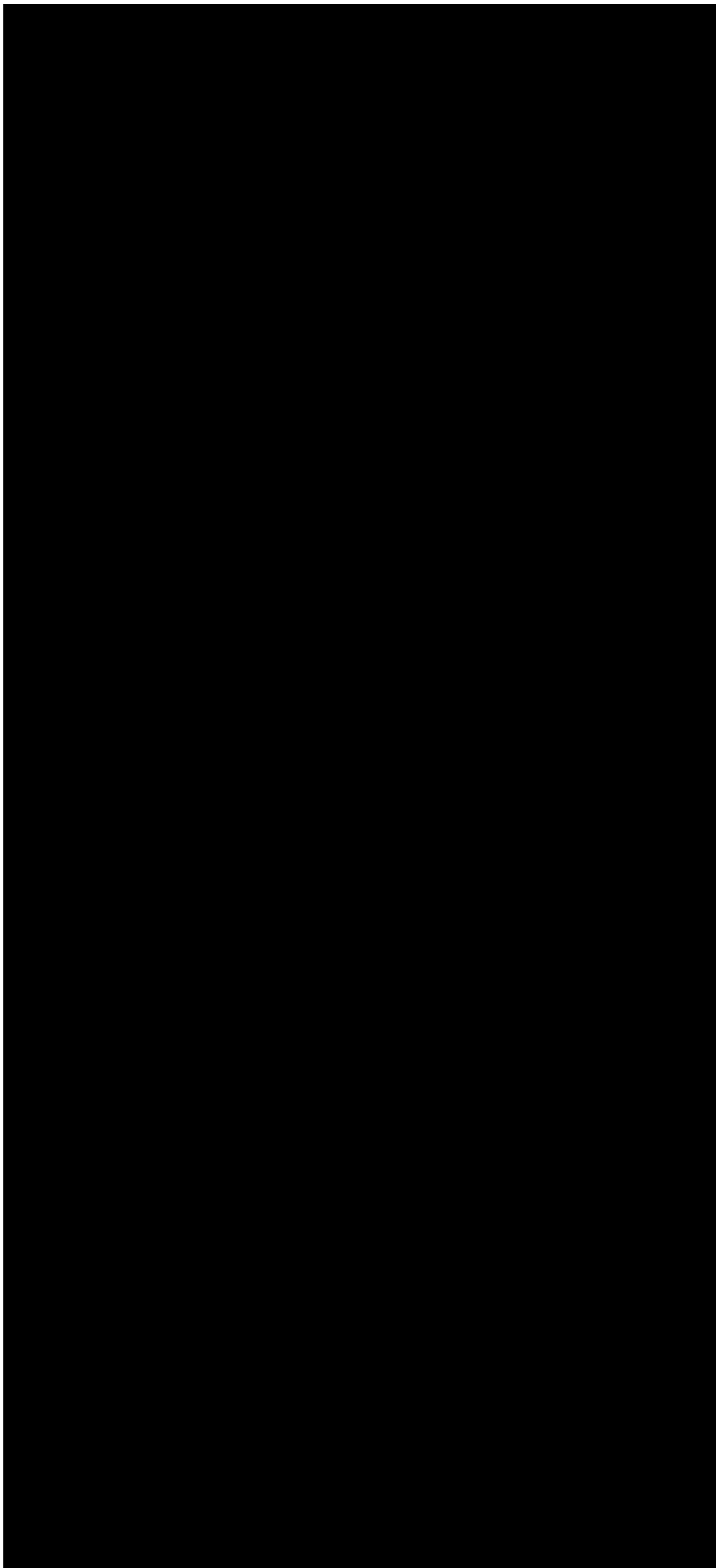


EXHIBIT I

Petitioner's Hearing Exhibit Composite, 21 tabbed sections with cover index. Filing 255482308, August 24, 2026.

Interior pages carry this composite's own Tabs 1 through 21 and reproduce Petition Appendix cover sheets lettered A through G. The controlling designation is Hearing Exhibit I.

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

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

Petitioners,

v.

Case No.: 01-2026-CA-001794

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

Respondents.

**NOTICE OF FILING
HEARING EXHIBIT COMPOSITE FOR THE AUGUST 24, 2026
CASE MANAGEMENT CONFERENCE**

PLEASE TAKE NOTICE that Petitioner Christopher A. Hanson files the attached Hearing Exhibit Composite (90 pages, 21 tabbed sections with cover index) for use at the Case Management Conference set for August 24, 2026, at 11:00 AM, at which the Court will hear Respondents' Motion for Protective Order, Respondents' Motion to Dispense With Rule 1.200 Case Management Procedures, and Petitioner's Cross-Motion to Set an Expedited Evidentiary Schedule.

The composite assembles, in date order, unaltered excerpts of documents already in the record or produced by the University itself: (1) Petitioner's filed Petition Appendix (Exhibits A through G); (2) the University's own processing file for Request No. W018463-032626, produced by the University on July 17, 2026 in response to Public Records Request No. W018964-060526; and (3) the University's Motion for Protective Order and its Exhibit D (Docket 006), as filed by the University. Each tabbed divider identifies the source document and page of each excerpt. The divider pages themselves are Petitioner's descriptive index, not evidence.

This composite is filed to give the Court and counsel the referenced pages in one citable format in advance of the conference.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, with its attachment, was served by the Florida Courts E-Filing Portal on August 24, 2026, on James W. Kirkconnell, Esq. (jameswk@ufl.edu) and Kristen LoGiurato (klogiurato@ufl.edu), 123 Tigert Hall, PO Box 113125, Gainesville, FL 32611-3125, Attorneys for Respondents.

/s/ Christopher A. Hanson
Christopher A. Hanson, Esq.
Florida Bar No. 44094
Petitioner, pro se, and as attorney and next friend
for his two minor children
cahanson77@yahoo.com | 727-409-5738

HEARING PACKET

Case Management Conference, August 24, 2026, 11:00 AM

Hanson v. University of Florida Board of Trustees

No. 01-2026-CA-001794, Eighth Judicial Circuit, Alachua County

Hon. Donna M. Keim

Purpose

This packet places what the University told me beside what the University was saying internally on the same subject, in date order. Every page is from the record: my filed petition appendix, the University's own processing file produced in response to a second public records request, and the University's July 30 motion and its Exhibit D.

The three numbers

- 479 pages gathered by the University in response to the March 26 request.
- 53 pages produced to me on May 4, when the request was declared complete.
- 426 pages withheld, until the University attached all of them to a public court filing on July 30.

Prepared 2026-08-24. Page numbers are the PDF page numbers of the e-filed document, in which a one-page Notice of Filing precedes this composite. Source pin cites appear on each tab divider.

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11	3	THE SEARCH INSTRUCTION UF processing file, emails_1, p. 2	March 30, 2026
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17	6	THE KEYWORD CHART: 113 'HANSON,' 27 'CHRIS HANSON' UF processing file, emails_1, p. 50	March 31, 2026
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65	19	UF'S RESPONSE, WITH METADATA UF production W018964-060526: four attachments, 732 pages total (emails_1, 370 pp.; emails_2, 351 pp.; Granicus audit log, 9 pp.; t	July 17, 2026
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78	21	EXHIBIT D: THE WITHHELD PAGES, FILED PUBLICLY Docket 006, Ex. D, 479 pages at PDF pp. 32-510 (samples)	July 30, 2026

TAB 1

MY REQUEST

March 26, 2026

Petition Appendix, Ex. A, App. 3-5

Category (A) my own name and contact information. (B) six enumerated case numbers. (C) a targeted keyword list. It expressly covers records on personal devices and private accounts, and asks for a privilege log and a written exemption basis for anything withheld.

EXHIBIT A

Public Records Request of March 26, 2026 (Ref. W018463-032626)

Subject: Formal Public Records Request: UF College of Journalism / Brechner Freedom of Information Project

Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- **A. Names and Contact Information:** "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- **B. Specific Case Numbers:** "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- **C. Targeted Keywords, Individuals & Subjects:** "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- **Catch-All & Personal Devices:** This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- **Format:** Please produce all records electronically in their native format or as PDFs.
- **Exemptions & Privilege Log:** If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the

basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production.

Sincerely,

Chris Hanson

Christopher A. Hanson, Esq.

FL Bar #44094

727-409-5738

cahanson77@yahoo.com

TAB 2

INTERNAL, THE SAME DAY: ROUTED TO COUNSEL

March 26, 2026, 2:00 PM
UF processing file, emails_1, p. 1

Hines to Associate Counsel Quillen and to James Kirkconnell, UF's litigation counsel in this case:
'Can we discuss this one at our meeting on Monday?' The request went to lawyers the day it arrived.

From: Hines, John
Sent time: 03/26/2026 02:00:37 PM
To: Quillen, Amy; Kirkconnell, James W
Cc: Wood, Barbara L
Subject: Public Records Request: W018463-032626

Can we discuss this one at our meeting on Monday?

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- Format: Please produce all records electronically in their native format or as PDFs.
- Exemptions & Privilege Log: If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production.

Chris Hanson
Christopher A. Hanson, Esq.
FL Bar #44094
727-409-5738
cahanson77@yahoo.com"

TAB 3

THE SEARCH INSTRUCTION

March 30, 2026, 11:29 AM

UF processing file, emails_1, p. 2

Hines to UFIT: 'Can you please handle the email search for this request? The person did not ask for attachments.' Two mailboxes only: Cuillier and Bambauer.

From: Hines, John
Sent time: 03/30/2026 11:29:17 AM
To: UFIT-eDiscovery
Cc: Quillen, Amy; Wood, Barbara L
Subject: Public Records Request: W018463-032626

Can you please handle the email search for this request? The person did not ask for attachments.

UF Mailboxes:
David Cuillier
Jane Bambauer

Time Frame:
December 1, 2024 to March 26, 2026

Keywords/Search Terms:
"Christopher Hanson"
"Chris Hanson"
["cahanson77@yahoo.com"](mailto:cahanson77@yahoo.com)
"Hanson"
"25-CA-10255"
"24-DR-001150"
"2025-CA-002469"
"2D2025-1936"
"2D2025-0681"
"2D2026-0279"
"13th Circuit"
"Scott Davis"
"Judge Kelly Ayers"
"Judge Matthew Felix"
"Gina Justice"
"Vivian Hodz"
"Judge Sherwood Coleman"
"Grace Samarkos"
"Florida Bar Mandamus"
"surveillance video"
"insider protectionism"

Request Language:

"Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", ["cahanson77@yahoo.com"](mailto:cahanson77@yahoo.com), "Hanson"

- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"

- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

Please let me know if you have any questions, thanks!
John

TAB 4

THE SEARCH STRATEGY: TWO MAILBOXES, DATE RANGE, KEYWORDS

March 30, 2026, 11:34 AM

UF processing file, emails_1, p. 54

UF's own configuration record. Mailboxes(2): Cuillier (Brechtner Center) and Bambauer (Journalism). Date Range: 'December 1, 2024 to March 26, 2026.' Then the full keyword list actually run, including the six case numbers, four named judges, 'Florida Bar Mandamus,' 'surveillance video,' and 'insider protectionism.' Two consequences. The configured end date was March 26. And these are targeted terms, not the far-reaching request UF describes in its motion.

Mailboxes(2) to Search:

Cuillier, David

UFID: 97484080
GLID: cuillierd
Affiliation: T - STAFF
Department: 23040300-CJC-BRECHNER CENTER
Email: cuillierd@ufl.edu

Bambauer, Jane

UFID: 24179662
GLID: janebambauer
Affiliation: F - FACULTY
Department: 23040000-CJC-JOURNALISM
Email: janebambauer@ufl.edu

Date Range:

December 1, 2024 to March 26, 2026

Keywords/Criteria (in subject or body):

"Christopher Hanson"
"Chris Hanson"
cahanson77@yahoo.com
"Hanson"
"25-CA-10255"
"24-DR-001150"
"2025-CA-002469"
"2D2025-1936"
"2D2025-0681"
"2D2026-0279"
"13th Circuit"
"Scott Davis"
"Judge Kelly Ayers"
"Judge Matthew Felix"
"Gina Justice"
"Vivian Hodz"
"Judge Sherwood Coleman"
"Grace Samarkos"
"Florida Bar Mandamus"
"surveillance video"
"insider protectionism"

--

Thank you,

Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square
720 SW 2nd Ave | North Tower, Suite 420
(352) 273-5039
<https://it.ufl.edu/>

How did we do? [Please rate our service.](#)

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>

Sent: Monday, March 30, 2026 11:34 AM

To: Hines, John <jkhines@ufl.edu>

Cc: Quillen, Amy <abquillen@ufl.edu>; Wood, Barbara L <blwood@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>

Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hello John,

TAB 5

THE SEARCH RESULT: 103 MESSAGES, 330 PAGES

March 30, 2026, 12:48 PM
UF processing file, emails_1, p. 23

UFIT: the search 'concluded with 103 message(s), which resulted in 330 page(s). No attachments were included.' UF knew the volume four days after the request.

From: UFIT-eDiscovery
Sent time: 03/30/2026 12:48:13 PM
To: Hines,John
Cc: Quillen,Amy; Wood,Barbara L; UFIT-eDiscovery
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hello John,

This search concluded with 103 message(s), which resulted in 330 page(s). No attachments were included.

Location to download associated files:

<https://www.dropbox.com/scl/fo/tu7uror3harudqrs4hcf0/AlxizVgtUyiQQFNa48zjHXI?rlkey=3d0hwgrpu5j6oicu8oug1ntks&st=qef3l4ls&dl=0>

Search Strategy for ISS-444193-W018463-032626

Mailboxes(2) to Search:

Cuillier,David

UFID: 97484080
GLID: cuillierd
Affiliation: T - STAFF
Department: 23040300-CJC-BRECHNER CENTER
Email: cuillierd@ufl.edu

Bambauer,Jane

UFID: 24179662
GLID: janebambauer
Affiliation: F - FACULTY
Department: 23040000-CJC-JOURNALISM
Email: janebambauer@ufl.edu

Date Range:

December 1, 2024 to March 26, 2026

Keywords/Criteria (in subject or body):

"Christopher Hanson"
"Chris Hanson"
cahanson77@yahoo.com
"Hanson"
"25-CA-10255"
"24-DR-001150"
"2025-CA-002469"
"2D2025-1936"
"2D2025-0681"
"2D2026-0279"
"13th Circuit"
"Scott Davis"
"Judge Kelly Ayers"
"Judge Matthew Felix"
"Gina Justice"
"Vivian Hodz"
"Judge Sherwood Coleman"
"Grace Samarkos"
"Florida Bar Mandamus"
"surveillance video"
"insider protectionism"

--

Thank you,

Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square

TAB 6

THE KEYWORD CHART: 113 'HANSON,' 27 'CHRIS HANSON'

March 31, 2026, 1:29 PM

UF processing file, emails_1, p. 50

UFIT's per-term results, in UF's own chart. 'Hanson' alone: 113 messages, 98.26 percent. 'Chris Hanson': 27. By UF's own numbers, 86 of the 113 hits matched only the bare surname. The chart reports results for only 9 of the 21 terms UF's own Search Strategy (Tab 4) configured; it is silent on the other 12, including 'Christopher Hanson,' 'Florida Bar Mandamus,' and 'insider protectionism.'

From: UFIT-eDiscovery
Sent time: 03/31/2026 01:29:06 PM
To: Hines,John
Cc: Quillen,Amy; Wood,Barbara L; UFIT-eDiscovery
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hi John,

Absolutely, please see the keyword chart for this search below:

Keyword	Message	Percent
Hanson	113	98.26%
13th Circuit	27	23.48%
Chris Hanson	27	23.48%
cahanson77@yahoo.com	25	21.74%
2025-CA-002469	2	1.74%
25-CA-10255	2	1.74%
Judge Kelly Ayers	2	1.74%
Judge Matthew Felix	2	1.74%
surveillance video	2	1.74%

Thank you,
Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square
720 SW 2nd Ave | North Tower, Suite 420
(352) 273-5039
<https://it.ufl.edu/>

How did we do? [Please rate our service.](#)

From: Hines,John <jkhines@ufl.edu>
Sent: Tuesday, March 31, 2026 12:19 PM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

When you have the chance, can you please provide the keyword chart for these results?

Thanks,
John

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Monday, March 30, 2026 12:48 PM
To: Hines,John <jkhines@ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hello John,

This search concluded with 103 message(s), which resulted in 330 page(s). No attachments were included.

Location to download associated files:

<https://www.dropbox.com/scl/fo/tu7uror3harudqrs4hcf0/AlxizVgtUyiQQFN48zjHXI?rlkey=3d0hwgrpu5j6oicu8oug1ntks&st=qef3l4ls&dl=0>

Search Strategy for ISS-444193-W018463-032626

Mailboxes(2) to Search:

Cuillier,David
UFID: 97484080
GLID: cuillierd
Affiliation: T - STAFF
Department: 23040300-CJC-BRECHNER CENTER
Email: cuillierd@ufl.edu

TAB 7

UF DECIDES IT DOES NOT NEED TEXT MESSAGES

March 30, 2026, 12:51 PM

UF processing file, emails_1, p. 26

Hines to Professor Bambauer directly: 'we are having IT conduct the email search and I don't believe we would need any text messages that don't specifically relate to what the person had asked for.' My request expressly covered text messages and personal devices. No text messages were ever produced, and no exemption was ever stated for them.

From: Hines,John
Sent time: 03/30/2026 12:51:08 PM
To: Bambauer, Jane
Cc: Quillen,Amy; Wood,Barbara L
Subject: RE: Public Records Request: W018463-032626

Thanks Jane!

Yes, what you have written makes sense – we are having IT conduct the email search and I don't believe we would need any text messages that don't specifically relate to what the person had asked for

John

From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Monday, March 30, 2026 12:19 PM
To: Hines,John <jkhines@ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>
Subject: Re: Public Records Request: W018463-032626

Hello,

As far as I know, the only responsive record I have with any of the names is an email that Chris Hanson sent to me. I can forward that if you need it, but since "email" wasn't highlighted I assume you have access and are just seeking my help with text messages and DMs.

I may have text messages that refer to the 13th Circuit (the most general of the search terms) but it will have nothing to do with Chris Hanson or his cases. Since I am a lawyer who keeps track of all sorts of cases, I don't think it's appropriate to have to search my personal communications for references to the 13th circuit that are not related. Does that make sense?

Get [Outlook for Mac](#)

From: Hines,John <jkhines@ufl.edu>
Date: Monday, March 30, 2026 at 11:36 AM
To: Bambauer, Jane <janebambauer@ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>, Wood,Barbara L <blwood@ufl.edu>
Subject: Public Records Request: W018463-032626

Professor Bambauer-

Please see below for the highlighted part of this public records request and determine if you have responsive records. As a reminder, only existing public records should be provided. The Florida Public Record laws do not require the university to create new records in response to a request. The IT Department is handling the email search.

The individual wrote:

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data that contain any of the following names, email addresses, case numbers, or keywords:

TAB 8

'SHALL I PREPARE AN INVOICE?'

March 30, 2026, 2:14 PM

UF processing file, emails_1, p. 36

Wood: '330 PAGES; EXCLUDING Attachments' from UFIT, 'Based on the number of pages (340), SHALL I PREPARE AN INVOICE?' Four days in, UF had a page count and a decision to make.

From: Wood,Barbara L
Sent time: 03/30/2026 02:14:29 PM
To: Hines,John; Quillen,Amy
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

All,

In addition to the 10 pages from I am in receipt of potentially responsive records (330 PAGES; EXCLUDING Attachments) from UFIT (03/30/26) regarding the PRR from W018463-032626. Based on the number of pages (340), SHALL I PREPARE AN INVOICE?

I have copied the records to Amy Q's PRR U: Drive to be reviewed by the General Counsel and for approval to be released at: W018463-032626\Fr UFIT 03-30-26\ISS-444193-W018463-032626-103-330-opt.pdf.

Thank you,

Barbara L. Wood, FRP

Legal Assistant II

Office of the Vice President and General Counsel

University of Florida

PO Box 113125

123 Tigert Hall

Gainesville, FL 32611

352-392-1358 office

352-392-4387 fax

blwood@ufl.edu



CONFIDENTIAL INFORMATION: The information contained in this electronic message and any attachments to it are intended for the exclusive use of all addressees and may contain confidential attorney-client communication and/or other confidential information. If you are not the intended recipient, please destroy all copies of this message and attachments and immediately notify this office by sending a reply e-mail to the sender. Thank you.

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Monday, March 30, 2026 12:48 PM
To: Hines,John <jkhines@ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hello John,

This search concluded with 103 message(s), which resulted in 330 page(s). No attachments were included.

Location to download associated files:

<https://www.dropbox.com/scl/fo/tu7uror3harudqrs4hcf0/AlxizVgtUyiQQFNa48zjHXI?rlkey=3d0hwgrpu5j6oicu8oug1ntks&st=qef3l4ls&dl=0>

Search Strategy for ISS-444193-W018463-032626

Mailboxes(2) to Search:

Cuillier,David

UFID: 97484080

GLID: cuillierd

Affiliation: T - STAFF

Department: 23040300-CJC-BRECHNER CENTER

Email: cuillierd@ufl.edu

TAB 9

'NO INVOICE FOR NOW'

April 3, 2026, and forward to April 23
UF processing file, emails_1, p. 68

April 3, 9:07 AM, Hines: 'Did you want me to provide the chart below to the requestor or did you want to invoice for the 340 pages?' 9:15 AM, Quillen: 'I think very little of this may be responsive, so no invoice for now.' The same page carries my April 22 status inquiry and the April 23 instruction on what to tell me.

From: Quillen,Amy
Sent time: 04/23/2026 12:25:18 PM
To: Hines,John
Cc: Wood,Barbara L
Subject: RE: Public Records Request: W018463-032626

You can let him know that his request is undergoing the legal review.

Amy

Amy B. Quillen
Associate Counsel
Office of the General Counsel
University of Florida
(352) 392-1358

From: Hines,John <jkhines@ufl.edu>
Sent: Wednesday, April 22, 2026 4:43 PM
To: Quillen,Amy <abquillen@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Public Records Request: W018463-032626

Hi Amy-

The requestor wrote the following, please advise on the response:

On 4/22/2026 9:54:15 AM, Chris Hanson (cahanson77@yahoo.com) wrote:

Good morning. I logged in and it appears my request was forwarded for processing. Can you please let me know the status and results of the search so far? Is there an estimate for when a complete response will be available? Thank you.

Chris Hanson
727-409-5738

From: Quillen,Amy <abquillen@ufl.edu>
Sent: Friday, April 3, 2026 9:15 AM
To: Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Public Records Request: W018463-032626

I think very little of this may be responsive, so no invoice for now.

Amy

Amy B. Quillen
Associate Counsel
Office of the General Counsel
University of Florida
(352) 392-1358

From: Hines,John <jkhines@ufl.edu>
Sent: Friday, April 3, 2026 9:07 AM
To: Quillen,Amy <abquillen@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>
Subject: FW: Public Records Request: W018463-032626

Hi Amy-

Did you want me to provide the chart below to the requestor or did you want to invoice for the 340 pages?

John

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Tuesday, March 31, 2026 1:29 PM

TAB 10

MY FOLLOW-UP, WHEN I HAD HEARD NOTHING

April 22, 2026

Petition Appendix, Ex. B, App. 6-9

I asked for 'the status and results of the search so far' and whether there was 'an estimate for when a complete response will be available.' By this date UF had held a page count for 23 days.

EXHIBIT B

Petitioner's April 22, 2026 Status Follow-Up

*Printed together with the University's March 26, 2026 receipt confirmation
quoting the request.*

Re: Public Records Request :: W018463-032626

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: universityofflorida@mycusthelp.net

Bcc: truthoverchaos@outlook.com

Date: Wednesday, April 22, 2026 at 09:52 AM EDT

Good morning. I logged in and it appears my request was forwarded for processing. Can you please let me know the status and results of the search so far? Is there an estimate for when a complete response will be available? Thank you.

Chris Hanson
727-409-5738

On Thursday, March 26, 2026 at 01:59:04 PM EDT, University of Florida Records Support Center <universityofflorida@mycusthelp.net> wrote:



Dear Chris Hanson:

This message confirms the university's receipt of your request for public records request on 3/26/2026. You may track the progress of your request using reference number W018463-032626.

Request: Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- Format: Please produce all records electronically in their native format or as PDFs.
- Exemptions & Privilege Log: If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production.

The university will review your request. If we need clarification or have a question, we will contact you.

Please also note: Email searches will not include attachments unless specifically requested.

Our scheduled office hours are Monday through Friday, 8:00 a.m. - 5:00 p.m. Requests received on weekends or holidays will be handled on the next business day.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been completed.

Sincerely,
University of Florida Public Records Request Center

To monitor the progress or update this request please log into the [Public Records Center](#).

TAB 11

WHAT I WAS TOLD: 'UNDERGOING THE LEGAL REVIEW'

April 23, 2026

Petition Appendix, Ex. C, App. 10-11

The entire substance of the answer. Set it beside Tab 9, which is the internal answer to the same question, already three weeks old.

EXHIBIT C

University of Florida Response of April 23, 2026: Request “Undergoing
the Legal Review”

Fw: Public Records Request :: W018463-032626

From: cahanson77@yahoo.com (cahanson77@yahoo.com)
To: truthoverchaos@outlook.com; christophhanson77@gmail.com
Date: Thursday, April 23, 2026 at 02:11 PM EDT

----- Forwarded Message -----

From: University of Florida Records Support Center <universityofflorida@mycusthelp.net>
To: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Thursday, April 23, 2026 at 12:39:01 PM EDT
Subject: Public Records Request :: W018463-032626

--- Please respond above this line ---

Dear Chris Hanson,

Your request is undergoing the legal review.

Sincerely,
University of Florida Public Records Request Center

On April 22, 2026, you had written:

"Good morning. I logged in and it appears my request was forwarded for processing. Can you please let me know the status and results of the search so far? Is there an estimate for when a complete response will be available? Thank you."

To monitor the progress or update this request please log into the Public Records Center.

TAB 12

INTERNAL: THE SEARCH HAD STALLED AT MARCH 9

May 4, 2026, 9:10 AM to 11:11 AM

UF processing file, emails_1, pp. 116, 120, 119, in event order

How UF found out, in three of its own pages. 9:10 AM: Professor Bambauer forwards Hines my March 25, 2026, 8:55 AM email to her, a responsive record the search never caught. 9:29 AM, Hines to UFIT: 'can you let us know why this email was not included in the search that was done for W018463-032626?' 10:39 AM, UFIT: the tool 'stalled before completing the search of Professor Bambauer's mailbox. After March 9th, 2026, no further emails were identified in her mailbox,' plus '17 other messages that matched the criteria and should have been included previously.' March 9 is three days before my first contact with Dr. Cuillier. 11:11 AM, Wood: '109 rerun PAGES' in hand, copied to the General Counsel 'for approval to be released.' The failure was discovered by accident, not by review.

From: Hines, John
Sent time: 05/04/2026 09:11:47 AM
To: Quillen, Amy
Cc: Wood, Barbara L
Subject: FW: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi Amy-

FYI on this email from Jane – I will put it on the U drive at W018463-032626

John

From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Monday, May 4, 2026 9:10 AM
To: Hines, John <jkhines@ufl.edu>
Subject: FW: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Get [Outlook for Mac](#)

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Date: Wednesday, March 25, 2026 at 8:55 AM
To: Bambauer, Jane <janebambauer@ufl.edu>
Subject: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

[External Email]

Good morning. I received your contact information from Mr. Cuillier in the chain below. As you will see I have two lawsuits pending related to public records violations and intentional concealment of records that would be embarrassing for some state officials. It's really a rather extreme situation that I've been dealing with for nearly two years. I'm really hoping that there is someone within the university apparatus that is able to assist me in pushing back against this state overreach.

I have extensive documentation to support all of my allegations. I am an attorney in the state of Florida. I have a perfectly clean disciplinary record other than a current sitting judge filing a clearly baseless and retaliatory bar complaint against me. It is directly related to the public records violations.

Please let me know if you can offer any guidance or assistance in this matter.

Thank you for your cooperation

Chris Hanson

----- Forwarded Message -----

From: Cuillier, David <cuillierd@ufl.edu>
To: cahanson77@yahoo.com <cahanson77@yahoo.com>; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>
Sent: Thursday, March 19, 2026 at 10:41:22 AM EDT
Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

Sorry to bum you out. As I said, it's not our mission to connect people to journalists – it's just not what we do (nor do we do public statements, amici, etc.). Jane Bambauer, the First Amendment prof also is not tasked with connecting people to journalists – she does research. You can reach out to her if you want: janebambauer@ufl.edu

I understand your frustration and wanting to get off the phone, but I was going to refer you to some other folks who might help, who do connect people to journalists/legal help on these issues :

- [Florida First Amendment Foundation](#) – they deal with FOI and First Amendment issues.
- New [First Amendment law clinic at FSU](#) – their mission is to help people with these problems.
- [Florida Center for Government Accountability](#) (they have their own publication, the Trident, that writes about these issues)
- ACLU and FIRE sometimes pick up these issues.

From: Hines, John <jkhines@ufl.edu>
Sent: Monday, May 4, 2026 9:29 AM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Cc: Wood, Barbara L <blwood@ufl.edu>; Quillen, Amy <abquillen@ufl.edu>
Subject: FW: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Good morning-

In going over the review for this request, can you let us know why this email was not included in the search that was done for W018463-032626?

Also, can you please provide the message in the thread below as a PDF from Professor Bambauer's mailbox:

“From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Date: Wednesday, March 25, 2026 at 8:55 AM
To: Bambauer, Jane <janebambauer@ufl.edu>”

Thanks!
John

From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Monday, May 4, 2026 9:10 AM
To: Hines, John <jkhines@ufl.edu>
Subject: FW: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

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From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Date: Wednesday, March 25, 2026 at 8:55 AM
To: Bambauer, Jane <janebambauer@ufl.edu>
Subject: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

[External Email]

Good morning. I received your contact information from Mr. Cuillier in the chain below. As you will see I have two lawsuits pending related to public records violations and intentional concealment of records that would be embarrassing for some state officials. It's really a rather extreme situation that I've been dealing with for nearly two years. I'm really hoping that there is someone within the university apparatus that is able to assist me in pushing back against this state overreach.

I have extensive documentation to support all of my allegations. I am an attorney in the state of Florida. I have a perfectly clean disciplinary record other than a current sitting judge filing a clearly baseless and retaliatory bar complaint against me. It is directly related to the public records violations.

Please let me know if you can offer any guidance or assistance in this matter.

Thank you for your cooperation

Chris Hanson

----- Forwarded Message -----

From: Cuillier, David <cuillierd@ufl.edu>
To: cahanson77@yahoo.com <cahanson77@yahoo.com>; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>
Sent: Thursday, March 19, 2026 at 10:41:22 AM EDT
Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

Sorry to bum you out. As I said, it's not our mission to connect people to journalists – it's just not what we do (nor do we do public statements, amici, etc.). Jane Bambauer, the First Amendment prof also is not tasked with connecting people to journalists – she does research. You can reach out to her if you want: janebambauer@ufl.edu

From: Wood, Barbara L
Sent time: 05/04/2026 11:11:08 AM
To: Hines, John; Quillen, Amy
Subject: W018463-032626 RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

All,

I am in receipt of potentially responsive records (109 rerun PAGES; EXCLUDING Attachments) from UFIT (05/04/26) regarding the PRR from W018463-032626. Based on the number of pages, SHALL I PREPARE AN INVOICE?

I have copied the records to Amy Q's PRR U: Drive to be reviewed by the General Counsel and for approval to be released at: W018463-032626\Fr UFIT 05-04-26.

Thank you,

Barbara L. Wood, FRP

Legal Assistant II

Office of the Vice President and General Counsel

University of Florida

PO Box 113125

123 Tigert Hall

Gainesville, FL 32611

352-392-1358 office

352-392-4387 fax

blwood@ufl.edu



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From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>

Sent: Monday, May 4, 2026 10:40 AM

To: Hines, John <jkhines@ufl.edu>

Cc: Wood, Barbara L <blwood@ufl.edu>; Quillen, Amy <abquillen@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>

Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

I have looked into the original search, and it appears that our search tool stalled before completing the search of Professor Bambauer's mailbox. After March 9th, 2026, no further emails were identified in her mailbox, whereas David Cuillier's mailbox was run through the entire requested date range. This is likely an indexing error.

When locating this message, the tool also identified 17 other messages that matched the criteria and should have been included previously. I have included those in PDF format as well.

Please see the Dropbox link attached below for those files:

<https://www.dropbox.com/scl/fo/sr966qqgejewbuilr56ls/AHicql9qLHkJ0ZKQ6v8PRQ0?rlkey=l3vfxgbqu7ogaztyrej1kfl3&st=w2m5xj6r&dl=0>

Thank you,

Daniel Quiros

Cybersecurity Engineer

UF Information Technology

Ayers @ Innovation Square

720 SW 2nd Ave | North Tower, Suite 420

(352) 273-5039

<https://it.ufl.edu/>

TAB 13

UF DECLARES THE REQUEST 'COMPLETE'

May 4, 2026, 3:22 PM

Petition Appendix, Ex. D, App. 12-15

'This completes the public records request.' Sent about four hours after Tab 12. 53 pages, substantially my own prior correspondence returned to me.

EXHIBIT D

University of Florida Response of May 4, 2026 Declaring the Request
“Complete,” and the Records Produced

Public Records Request :: W018463-032626

From: University of Florida Records Support Center (universityofflorida@mycusthelp.net)

To: cahanson77@yahoo.com

Date: Monday, May 4, 2026 at 03:22 PM EDT

Attachments:

[W018463-1.pdf](#)

[W018463-2.pdf](#)

--- Please respond above this line ---



05/04/2026

RE: PUBLIC RECORDS REQUEST of March 26, 2026, Reference # W018463-032626

Dear Chris Hanson,

The University of Florida received a public information request from you on March 26, 2026. Your request mentioned:

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024,

and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- Format: Please produce all records electronically in their native format or as PDFs.
- Exemptions & Privilege Log: If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production."

The University has reviewed its files and has located responsive records to your request. These records have been included in this correspondence.

This completes the public records request.

Sincerely,
University of Florida Public Records Request Center

To monitor the progress or update this request please log into the [Public Records Center](#).

TAB 14

MY OBJECTION AND DEFICIENCY LETTER

May 4, 2026, 5:03 PM

Petition Appendix, Ex. E, App. 66-71

Sent 5:03 PM, one hour and forty-one minutes after the 3:22 PM completion notice. Statutory notice under section 119.12(1)(b), with a compliance deadline of May 11, 2026. It asks, the same afternoon: 'What type of legal review was necessary on producing what's self-evidently already in my possession?'

EXHIBIT E

Petitioner's Deficiency Letter and § 119.12(1)(b) Notice, May 4, 2026

Re: Public Records Request :: W018463-032626

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: universityofflorida@mycusthelp.net; cuillierd@ufl.edu; truthoverchaos@outlook.com

Date: Monday, May 4, 2026 at 05:03 PM EDT

Good afternoon.

I write regarding Public Records Request W018463-032626, submitted March 26, 2026.

Earlier today, on May 4, 2026, your office produced two PDF attachments (W018463-1.pdf and W018463-2.pdf) consisting solely of email communications that I myself initiated and sent to UF employees. Your cover email stated that “This completes the public records request.” I must make it clear that I strongly disagree that closure of this request is appropriate.

The materials sought are critical to numerous other pending cases. The course of events and relevant information I already have make the nature of UF's conduct thus far very concerning. What was the delay in producing communications already within my possession? What type of legal review was necessary on producing what's self-evidently already in my possession?

While I appreciate receipt of those records, this production does **not** constitute a complete or compliant response under Chapter 119, Florida Statutes. There are numerous failures in the response, not the least of which being there is nothing stating whether any documents were withheld. Before this public records request is resolved, I need you all to address these clear deficiencies at a minimum:

1. **No Identification of Custodian/Designee.** My request (and subsequent follow-ups on April 24 and April 30, 2026) expressly demanded the name and direct contact information of the specific individual or legal designee processing the request, as required by §119.07(1)(b), Florida Statutes. No such identification has ever been provided.
2. **No Certification of Complete Search.** There has been no written confirmation that a thorough, good-faith search was conducted of all responsive records maintained by, sent to, or received by the named custodians (Brechtner Freedom of Information Project staff, Dr. David Cuillier, Professor Jane Bambauer, and others in the UF College of Journalism and Communications), including records on personal devices or private email accounts used for university business.

3. **Unexplained “Legal Review” and Lack of Privilege Log.** For weeks your office responded only that the request was “undergoing the legal review,” without identifying any specific statutory exemption under Chapter 119 or the Florida Constitution, without providing a privilege log for any withheld records, and without producing non-exempt records on a rolling basis as I repeatedly requested.
4. **Scope of Production.** The records produced contain no internal UF communications, memoranda, notes, drafts, or other documents responsive to the broad categories I requested (names, case numbers, and keywords appearing in any written communications between December 1, 2024, and the date of fulfillment).

To evaluate compliance with Chapter 119 and Article I, Section 24 of the Florida Constitution, I respectfully demand the following **no later than close of business on Monday, May 11, 2026**:

1. The full name, title, direct email address, and phone number of the individual currently designated as the custodian or designee responsible for this request (§119.07(1)(b), F.S.).
2. Written certification that a complete and diligent search has been performed, identifying the custodians and locations searched.
3. A privilege log (detailed written explanation) specifically identifying any responsive records that were withheld or redacted, including the specific statutory exemption claimed for each.
4. Immediate production of any additional responsive records on a rolling basis, together with a date-certain for final production of any remaining records.

I remind the University of its statutory obligation to respond promptly and in good faith (§119.07(1)(c), F.S.). Unreasonable delay or continued non-compliance may necessitate judicial enforcement under §119.11, F.S., including recovery of attorney’s fees and costs.

Pursuant to Section 119.12(1)(b), Florida Statutes, please consider this correspondence as formal, five (5) business days' written notice of the University's unlawful refusal to fully comply with my public records request.

If I do not receive reasonable answers and supporting materials by the deadline, I will consider your May 4, 2026 correspondence to be a constructive denial and an unlawful refusal to produce public records. I will then proceed with filing a Petition for Writ of Mandamus in the appropriate circuit court and will seek all applicable attorney's fees and costs necessitated by your non-compliance pursuant to §119.11 and §119.12, F.S.

I am available to speak directly with the designated custodian at your earliest convenience and remain willing to resolve this matter cooperatively.

Thank you for your immediate attention.

Sincerely,

Christopher A. Hanson, Esq.
FL Bar #44094
727-409-5738
cahanson77@yahoo.com

On Monday, May 4, 2026 at 03:22:03 PM EDT, University of Florida Records Support Center
<universityofflorida@mycusthelp.net> wrote:

Attachments:

[W018463-1.pdf](#)

[W018463-2.pdf](#)

--- Please respond above this line ---



05/04/2026

RE: PUBLIC RECORDS REQUEST of March 26, 2026, Reference # W018463-032626

Dear Chris Hanson,

The University of Florida received a public information request from you on March 26, 2026.
Your request mentioned:

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I

am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- Format: Please produce all records electronically in their native format or as PDFs.
- Exemptions & Privilege Log: If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production."

The University has reviewed its files and has located responsive records to your request. These records have been included in this correspondence.

This completes the public records request.

Sincerely,
University of Florida Public Records Request Center

To monitor the progress or update this request please log into the [Public Records Center](#).

TAB 15

THE SECOND KEYWORD CHART: THE RECOVERED BATCH

May 7, 2026, 8:49 AM

UF production W018964-060526, emails_2, p. 217 (a page that appears only in emails_2, not in emails_1)

UFIT's chart for the batch recovered after the stalled Bambauer search: 18 messages. 'Hanson': 18, 100 percent. 'Chris Hanson': 1. The day before UF asked whether I sought records relating to 'individuals who are not you' (next tab), its own chart had already quantified exactly that composition.

From: Hines,John
Sent time: 05/07/2026 08:49:39 AM
To: UFIT-eDiscovery
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Thanks a lot, Daniel!

John

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Thursday, May 7, 2026 8:49 AM
To: Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

Please see the keyword chart for this search below:

Keyword	Message	Percent
Hanson	18	100.00%
Chris Hanson	1	3.45%
cahanson77@yahoo.com	1	3.45%
13th Circuit	1	3.45%

Thank you,
Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square
720 SW 2nd Ave | North Tower, Suite 420
(352) 273-5039
<https://it.ufl.edu/>

How did we do? [Please rate our service.](#)

From: Hines,John <jkhines@ufl.edu>
Sent: Thursday, May 7, 2026 7:51 AM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Good morning-

When you have the chance, can you please provide us with the keywords summary chart related to this search?

Thanks again,
John

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Monday, May 4, 2026 10:40 AM
To: Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

I have looked into the original search, and it appears that our search tool stalled before completing the search of Professor Bambauer's mailbox. After March 9th, 2026, no further emails were identified in her mailbox, whereas David Cuillier's mailbox was run through the entire requested date range. This is likely an indexing error.

When locating this message, the tool also identified 17 other messages that matched the criteria and should have been included previously. I have included those in PDF format as well.

Please see the Dropbox link attached below for those files:

<https://www.dropbox.com/scl/fo/sr966qqgejewbuilr56ls/AHlqcl9qLHkJOZKQ6v8PRQ0?>

TAB 16

UF'S ANSWER: RECORDS 'RELATING TO' OTHERS

May 8, 2026, 1:07 PM

Petition Appendix, Ex. F, App. 72

UF confirms it located records containing 'Hanson' that 'relate to individuals who are not' me, and asks whether I sought them. Four days had passed since my May 4 objection; none of its questions were answered. By this date UF's own keyword charts (Tabs 6 and 15) had already quantified the mix it was asking me about. Ex. F is a cover sheet; UF's email appears in full inside Tab 17.

EXHIBIT F

University of Florida Email of May 8, 2026 (“Hanson” records “relating to” others)

The full text of this email is reproduced within Exhibit G.

TAB 17

MY WRITTEN RESPONSE

May 8, 2026, 2:05 PM

Petition Appendix, Ex. G, App. 73-80

I answered directly: I did not want every UF communication containing the word 'Hanson.' The request was never that.

EXHIBIT G

Petitioner's Written Response of May 8, 2026

Re: Public Records Request :: W018463-032626

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: universityofflorida@mycusthelp.net; cuillierd@ufl.edu; truthoverchaos@outlook.com

Date: Friday, May 8, 2026 at 02:05 PM EDT

To Whom It May Concern at the University of Florida Public Records Request Center:

As a preliminary matter, I previously asked that the University respond within this email chain rather than initiating separate, disconnected emails, so that the full record of correspondence would remain in one place and so that each side's communications would be clear. That request has been ignored. Your most recent email, like the one before it, was sent as a stand-alone message, unsigned, with no individual name, title, or direct contact information attached to it.

It's counter-productive to respond in that manner. Here is your email copied here:

"To: me · Fri, May 8 at 1:07 PM

Message Body

--- Please respond above this line ---

Dear Chris Hanson,

The university did locate public records that contain the search term "Hanson," which relate to individuals who are not you, but have the same last name. Do you seek those public records?

Sincerely,

University of Florida Public Records Request Center"

I raise this not as a stylistic complaint but because it is part of a larger and increasingly concerning pattern. The University has now responded to my correspondence three times without identifying any human being responsible for the positions it is taking. No custodian has been named. No designee has been named. No author of any of the University's responses has been named.

Even the simple courtesy of replying within an existing email thread — something that costs the University nothing — has been declined. It is fair to ask why, when the University is asserting legal positions of its own choosing under Chapter 119, it has been unwilling at any point to put a name to those positions. The Public Records Law is built on the premise that public business is the public's business, and that includes knowing which public employee is making the decisions about what will and will not be produced. The Brechner Center's Mission is precisely in line with that Citizen expectation. What is going on here??

Turning to the substance of your most recent email, you ask whether I want public records that contain the search term "Hanson" but "relate to individuals who are not [me]." The answer is no - I don't want all UF communications that contain "Hanson." My March 26, 2026 request was not a request for every record at the University of Florida containing the word "Hanson." It was a structured request defining three specific categories: (A) my own name and personal information; (B) enumerated case numbers tied to my pending litigation; and (C) a targeted list of keywords, individuals, and subjects connected to those cases. I am seeking records responsive to those categories. I am not seeking records about unrelated third parties who happen to share my surname.

Regardless, your latest correspondence further compounds the deficiencies I identified in my May 4, 2026 letter:

First, your email states that the University "did locate public records that contain the search term 'Hanson,' which relate to individuals who are not you." This is the first written confirmation from the University that records were located, reviewed, and then filtered out of the production based on the University's own subjective determination of whether those records "relate to" me.

There is no exemption under Chapter 119, Florida Statutes, or Article I, Section 24 of the Florida Constitution that authorizes a public agency to withhold non-exempt records based on the agency's internal judgment of relevance nor "relation." If the University believes such authority exists, please identify the specific statutory basis in writing.

Otherwise, please confirm whether the University has any records responsive to my public records request even if the University finds that they "relate" to someone else. This must include Internal University communications, memoranda, notes, or drafts referencing the case numbers, individuals, or keywords I identified and produce a privilege log identifying each such record.

Second, as set forth above, the University has now responded to my correspondence three times without identifying, by name, the individual or legal designee processing this request. My request, my April 24 and April 30 follow-ups, and my May 4 deficiency letter have each specifically asked for the name, title, direct email, and phone number of the individual handling this matter. To date, no such information has been provided. Pointing me to a generic webpage is not a substitute for identifying the person responsible for the response. Please provide that information immediately.

Third, the remaining deficiencies identified in my May 4, 2026 letter remain unaddressed: (i) no 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; (ii) no privilege log identifying records withheld or redacted and the specific statutory exemption claimed for each; and (iii) no production of internal University communications, memoranda, notes, or drafts responsive to the categories defined in the request.

Fourth, please be advised that none of the University's recent correspondence — including the May 4 production of my own emails back to me, the subsequent unsigned email asserting general compliance, or the most recent inquiry about unrelated third parties — operates to pause, reset, or satisfy my public records request and the five business days' written notice provided pursuant to Section 119.12(1)(b), Florida Statutes, in my May 4, 2026 letter. That notice period continues to run, and the deadline for full statutory compliance remains the close of business on Monday, May 11, 2026.

I continue to prefer an amicable resolution and remain willing to speak directly with the designated custodian once the University identifies that individual. Absent meaningful compliance by the deadline, I will treat the University's correspondence to date as a constructive denial and unlawful refusal to produce public records, and will proceed with

filing a Petition for Writ of Mandamus in the appropriate circuit court, seeking all applicable attorney's fees and costs pursuant to Sections 119.11 and 119.12, Florida Statutes.

I'm not trying to unnecessarily embarrass anyone with the records. They are critical to some legal work I'm doing. If the University will simply cooperate, I'm willing to discuss terms that might allow any sensitive or embarrassing communications to avoid publicity. My goal remains a fair result in the underlying proceedings and I believe the materials that UF are critical to that.

Thank you for your prompt attention to these matters.

Sincerely,

Christopher A. Hanson, Esq.
FL Bar #44094
727-409-5738
cahanson77@yahoo.com

On Wednesday, May 6, 2026 at 04:31:29 PM EDT, cahanson77@yahoo.com <cahanson77@yahoo.com> wrote:

Good afternoon. I recently received yet another nameless, faceless email trying to avoid compliance with Chapter 119. I continue to have the questions that I outline in the chain below.

Here is the email cut and paste from the one I received yesterday:

"Dear Chris Hanson,

The university is in receipt of the questions regarding your public records request. Please note, the university complies fully with Florida's public records laws. Records custodian information is prominently identified on [UF's Public Records Center website, linked here](#). The university conducted a good faith search for any public records responsive to your request, including reaching out to the employees you identified and to UF IT to conduct email searches. In accordance with the law and normal UF process, all located records incurred a legal review in order to determine responsiveness and the potential exempt nature of information in the records. No exempt information was withheld or redacted from the records responsive to your request, and consequently, no statutory exemptions were cited in UF's response.

We hope this explanation is helpful.

Sincerely,
University of Florida Public Records Request Center"

Your email on its face fails to comply with Chapter 119. It will make it easier moving forward if you simply respond to this email chain so it's clear what each of us is communicating. You have not complied with the Chapter 119 requirements that I describe below. Please respond with appropriate information including the individual(s) responsible for any certifications.

One concern not addressed is that you all removed non-exempt materials from the response without justification. There are certainly other shortcomings to statutory compliance that require further exploration. Accordingly, I will allow the good faith attempts at resolution as long as I'm able to make any progress.

I have never looked to file any lawsuits despite the current volume of relevant litigation. I hope that you will comply with the statutory requirements immediately. If you all comply voluntarily, I am not looking to cause any undue embarrassment. However, these issues cannot go unaddressed.

I hope that we will be able to resolve this amicably. Otherwise, as soon as it becomes feasible after expiration of the statutory notice under 119.12(1)(b) below, I will proceed with filing a petition for writ of certiorari in the Circuit Court. Please let me know your thoughts on additional efforts at compliance at your earliest convenience.

Chris Hanson
FL Bar #44094

On Monday, May 4, 2026 at 05:03:45 PM EDT, cahanson77@yahoo.com <cahanson77@yahoo.com> wrote:

Good afternoon.

I write regarding Public Records Request W018463-032626, submitted March 26, 2026.

Earlier today, on May 4, 2026, your office produced two PDF attachments (W018463-1.pdf and W018463-2.pdf) consisting solely of email communications that I myself initiated and sent to UF employees. Your cover email stated that "This completes the public records request." I must make it clear that I strongly disagree that closure of this request is appropriate.

The materials sought are critical to numerous other pending cases. The course of events and relevant information I already have make the nature of UF's conduct thus far very concerning. What was the delay in producing communications already within my possession? What type of legal review was necessary on producing what's self-evidently already in my possession?

While I appreciate receipt of those records, this production does **not** constitute a complete or compliant response under Chapter 119, Florida Statutes. There are numerous failures in the response, not the least of which being there is nothing stating whether any documents were withheld. Before this public records request is resolved, I need you all to address these clear deficiencies at a minimum:

1. **No Identification of Custodian/Designee.** My request (and subsequent follow-ups on April 24 and April 30, 2026) expressly demanded the name and direct contact information of the specific individual or legal designee processing the request, as required by §119.07(1)(b), Florida Statutes. No such identification has ever been provided.
2. **No Certification of Complete Search.** There has been no written confirmation that a thorough, good-faith search was conducted of all responsive records maintained by, sent to, or received by the named custodians (Brechtner Freedom of Information Project staff, Dr. David Cuillier, Professor Jane Bambauer, and others in the UF College of Journalism and Communications), including records on personal devices or private email accounts used for university business.

3. **Unexplained “Legal Review” and Lack of Privilege Log.** For weeks your office responded only that the request was “undergoing the legal review,” without identifying any specific statutory exemption under Chapter 119 or the Florida Constitution, without providing a privilege log for any withheld records, and without producing non-exempt records on a rolling basis as I repeatedly requested.
4. **Scope of Production.** The records produced contain no internal UF communications, memoranda, notes, drafts, or other documents responsive to the broad categories I requested (names, case numbers, and keywords appearing in any written communications between December 1, 2024, and the date of fulfillment).

To evaluate compliance with Chapter 119 and Article I, Section 24 of the Florida Constitution, I respectfully demand the following **no later than close of business on Monday, May 11, 2026**:

1. The full name, title, direct email address, and phone number of the individual currently designated as the custodian or designee responsible for this request (§119.07(1)(b), F.S.).
2. Written certification that a complete and diligent search has been performed, identifying the custodians and locations searched.
3. A privilege log (detailed written explanation) specifically identifying any responsive records that were withheld or redacted, including the specific statutory exemption claimed for each.
4. Immediate production of any additional responsive records on a rolling basis, together with a date-certain for final production of any remaining records.

I remind the University of its statutory obligation to respond promptly and in good faith (§119.07(1)(c), F.S.). Unreasonable delay or continued non-compliance may necessitate judicial enforcement under §119.11, F.S., including recovery of attorney’s fees and costs.

Pursuant to Section 119.12(1)(b), Florida Statutes, please consider this correspondence as formal, five (5) business days’ written notice of the University’s unlawful refusal to fully comply with my public records request.

If I do not receive reasonable answers and supporting materials by the deadline, I will consider your May 4, 2026 correspondence to be a constructive denial and an unlawful refusal to produce public records. I will then proceed with filing a Petition for Writ of Mandamus in the appropriate circuit court and will seek all applicable attorney’s fees and costs necessitated by your non-compliance pursuant to §119.11 and §119.12, F.S.

I am available to speak directly with the designated custodian at your earliest convenience and remain willing to resolve this matter cooperatively.

Thank you for your immediate attention.

Sincerely,

Christopher A. Hanson, Esq.
FL Bar #44094
727-409-5738
cahanson77@yahoo.com

On Monday, May 4, 2026 at 03:22:03 PM EDT, University of Florida Records Support Center <universityoflora@mycusthelp.net> wrote:

Attachments:

[W018463-1.pdf](#)

[W018463-2.pdf](#)

--- Please respond above this line ---



05/04/2026

RE: PUBLIC RECORDS REQUEST of March 26, 2026, Reference # W018463-032626

Dear Chris Hanson,

The University of Florida received a public information request from you on March 26, 2026. Your request mentioned:

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus",

"surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- Format: Please produce all records electronically in their native format or as PDFs.
- Exemptions & Privilege Log: If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production."

The University has reviewed its files and has located responsive records to your request. These records have been included in this correspondence.

This completes the public records request.

Sincerely,
University of Florida Public Records Request Center

To monitor the progress or update this request please log into the [Public Records Center](#).

TAB 18

MY REQUEST FOR THE PROCESSING RECORD

June 19, 2026

PRR2, the processing and 'legal review' record of W018463-032626

The second request. It asks for the workflow record, internal notes, status changes, and assignment history. Everything at Tabs 2 through 9 and Tab 12 exists here only because this was asked for separately.

To: University of Florida Custodian of Public Records (universityofflorida@mycusthelp.net)

From: Christopher A. Hanson, Esq. (cahanson77@yahoo.com)

Re: NEW Public Records Request — Records Relating to the Processing and “Legal Review” of Request No. W018463-032626

Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I request access to inspect and copy the public records described below. This is a new and separate request; it does not amend, replace, or extend Request No. W018463-032626, which remains outstanding.

Background: in response to Request No. W018463-032626, your office stated for several weeks that the request was “undergoing the legal review.” This request seeks the public records of that processing and legal review.

I. TIME FRAME

Records created, sent, or received between March 20, 2026, and the date this request is fulfilled.

II. RECORDS REQUESTED

1. Records sufficient to identify, by name and title, every individual who processed, reviewed, approved, or participated in the response to Request No. W018463-032626, including any attorney — whether in the UF Office of the General Counsel or at an outside law firm — who performed or supervised the referenced “legal review.”
2. If any outside law firm or outside attorney was engaged in connection with the request or the legal review: all engagement letters, retainer agreements, conflict-check records, purchase orders, invoices, billing statements, time entries, expense records, and records of payment (including check, ACH, or wire records).
3. In the alternative, if the legal review was performed internally (e.g., by the Office of the General Counsel): all matter-opening or matter-assignment records, time records, internal billing or charge-back records, and records sufficient to show the dates on which the review was opened, worked, and closed, and the hours devoted to it.
4. All communications between the University’s Public Records Request Center (or any other University office or employee) and any attorney or legal office, internal or external, concerning Request No. W018463-032626. For any communication withheld or redacted on privilege or exemption grounds, provide a written statement of the specific statutory exemption with citation, together with a privilege log identifying the date, author, recipient(s), and general subject matter of each withheld record, as required by Section 119.07(1)(d)–(f), Florida Statutes.

5. The complete processing and workflow record for Request No. W018463-032626 within the University's records-request management system (e.g., MyCustHelp/GovQA or similar), including internal notes, comments, status changes, assignment history, escalation entries, and the system audit trail for the request.
6. All records reflecting the searches performed in response to Request No. W018463-032626, including: the search terms used; the custodians, mailboxes, systems, and repositories searched; the dates the searches were run; hit counts, search-result reports, or export logs; and any records showing whether searches were run for the enumerated case numbers and the targeted keywords, individuals, and subjects identified in Categories B and C of that request.
7. All records reflecting the decision to withhold from production records containing the term "Hanson" on the ground that they "relate to individuals who are not" the requester — including who made that determination, when it was made, and any written basis for it.
8. Any University policies, procedures, guidelines, or training materials governing "legal review" of public records requests.

III. FORMAT, COSTS, AND PRODUCTION

Please produce records electronically in native format or as PDFs, on a rolling basis as they become available. If you anticipate a special service charge under Section 119.07(4)(d), Florida Statutes, provide a written, itemized estimate before incurring any costs. I note that an agency's legal invoices, engagement records, and payment records are public records under Florida law, subject at most to narrow redaction of privileged matter, with the burden on the agency to justify each redaction in writing.

Please acknowledge receipt, assign a reference number, identify by name and title the custodian or designee responsible for this request, and provide an estimated timeline for production. Please respond within this email chain.

Sincerely,

Christopher A. Hanson, Esq.

FL Bar #44094

727-409-5738

cahanson77@yahoo.com

TAB 19

UF'S RESPONSE, WITH METADATA

July 17, 2026

UF production W018964-060526: four attachments, 732 pages total (emails_1, 370 pp.; emails_2, 351 pp.; Granicus audit log, 9 pp.; the request, 2 pp.). Samples from emails_1 at pp. 33-35.

What the second request produced. Every page carries the header metadata: From, Sent time to the second, To, Cc, Subject. These sample pages show my March 19 and March 12, 2026 emails to Cuillier and the Brechner Report inside UF's own file, with timestamps. This is the metadata that makes the timeline in this packet provable.

Dave

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Thursday, March 19, 2026 10:31 AM

To: Cuillier, David <cuillierd@ufl.edu>; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>

Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Hi Dave. Thank you for your time. I was really disappointed with what you had to say. From researching your organization and its mission statement and history, I truly thought that you would help me in this nightmare of state and judicial corruption. There are rampant violations of due process, access to judicial records, and the separation of powers. Its a vast network of powerful and corrupt individuals that only a competent and ethical journalist can hold accountable. As I understand it, you simply cant help and dont know any journalists? You did mention something about doing a survey or a study on my case. Yes, please do that. The case numbers are as follows. Also, you mentioned one other person whom I could contact with university of Florida. Will you please send her contact information over for me? Again, I am very disappointed that the Brechner Freedom of Information Project is not able to assist with getting publicity for this important info about active and intentional public records concealment. The violations here, including judges acting unlawfully to protect the powerful, are certainly harming me and family, and certainly many others who are unable to address the misconduct of these powerful insiders. Where should my family turn? If I misunderstood anything or you have any suggestion for me beyond contacting your colleague and continuing to reach out to journalist, please let me know. Ill be happy to get you any information you need about the active public records litigation in the second and 13th/6th circuit for the survey or whatever data review you do. Thank you for your time. Chris Hanson 727-409-5738 FI bar 44094

[Sent from Yahoo Mail for iPhone](#)

On Thursday, March 12, 2026, 12:48 PM, Cuillier, David <cuillierd@ufl.edu> wrote:

I can call you then, Chris.

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Thursday, March 12, 2026 12:42 PM

To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>

Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Thanks Dave. I have a conference on my calendar for Thursday the 19th at 10am. You can call my cell - 727-409-5738 then or let me know if you prefer zoom or another application.

Chris

On Thursday, March 12, 2026 at 12:25:15 PM EDT, Cuillier, David <cuillierd@ufl.edu> wrote:

I'm free next week Thursday 9-1 or Friday 9-12 if any of those times work.

Dave

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Thursday, March 12, 2026 12:20 PM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Subject: Re: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Hi Dave! Thanks for the response. I would really appreciate a quick discussion next week. The legal issues are as under control as they can be. What's confusing me more are the trends in public access to records, increasing exemptions, costs, and flat-out non-compliance in many cases. I'd really appreciate a few minutes of your time next week. Whenever you get a chance, please let me know what day/time would work and all put it on my calendar. Have a great conference and be safe!

Chris

On Thursday, March 12, 2026 at 11:57:53 AM EDT, Cuillier, David <cuillierd@ufl.edu> wrote:

Chris,

Thanks for reaching out. I'm not sure if we are the right people to help – we don't do legal work. We focus on research and education in access to public records (I have a Ph.D., not a J.D., so I can't give legal advice). I'm happy to chat with you, but I wouldn't be able to do so until late next week – I'm organizing a conference that runs Sunday-Tuesday in D.C. and under the gun. But could chat Thursday or Friday next week when I'm back in the office.

Dave

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Thursday, March 12, 2026 10:51 AM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Subject: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Good morning. I've called and left messages a few times. However, I just noticed that I had your email address wrong. I'm having trouble with the Florida Bar and the 13th Circuit Court concealing records that are obviously not exempt from production. They have confirmed the existence and I've paid for them, but they intentionally concealed and continue to conceal the target records. I have the matter in litigation. I believe there is significant judicial misconduct throughout this matter that demonstrates an apparent two-tier system of justice. I'm really hoping that the Brechner Freedom of Information Project will look at some of this information with an open mind and an

understanding that this type of corruption within the judiciary is dangerous and must be investigated. Rather than overwhelm you with attachments, I think it would be more helpful if someone could speak to me about the case and determine if FAF is willing to get involved. Thank you.

Chris Hanson

FL Bar #44094

Phone: 727-409-5738

TAB 20

UF'S MOTION FOR PROTECTIVE ORDER

July 30, 2026

Docket 006, Filing 253616687, motion body pp. 1-8

UF asks the Court to stop all discovery until it rules on compliance, and describes my discovery as 'abusive.' Paragraph 24 and its footnotes describe the three categories and attach the gathered set as Exhibit D.

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

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

v.

Case No.: 01-2026-CA-001794

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

_____ /

MOTION FOR PROTECTIVE ORDER

COMES NOW, Respondent, the University of Florida Board of Trustees (the “University”), and moves that the Court issue a protective order as to Petitioner’s discovery requests, and in support states:

1. On July 13, 2026, Petitioner propounded discovery requests on the University, including *Petitioner’s First Set of Interrogatories to Respondents*, *Petitioner’s First Requests for Admission to Respondents*, and *Petitioner’s First Request to Produce to Respondents*. On July 24, 2026, Petitioner served a *Notice of Taking Deposition (Via Zoom Videoconference)* directed to John Hines, as well as a *Notice of Taking Deposition of Non-Party Witness (Via Zoom Videoconference)* and a *Subpoena for Deposition (Via Zoom Videoconference)*, both directed to Professor Jane Bambauer. These discovery requests are attached as composite **Exhibit A**.

2. The University respectfully requests that the Court issue a protective order with regard to Petitioner’s discovery requests and depositions until the Court determines the threshold issue of whether the University complied with Chapter 119. If the Court finds that the University

has complied with Chapter 119, then further discovery is unnecessary. *See Morris v. City of Miami*, 402 So. 3d 424, 426 (Fla. 3d DCA 2024).

3. “On motion by a party or by the person from whom discovery is sought, and for good cause shown, the court in which the action is pending may make any order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense that justice requires[.]” Fla. R. Civ. P. 1.280(d). For the reasons explained below, the discovery propounded by Petitioner represents an undue burden and expense for the University.

4. Good cause exists for the issuance of a protective order because Petitioner seeks to accomplish through discovery what he is not entitled to under Chapter 119. *Jones v. Miami Herald Media Co.*, 198 So. 3d 1143, 1145 (Fla. 1st DCA 2016) (Courts are not authorized “to expand the requirements of the [Public Records] Act beyond its plain language.”). Stated differently, Petitioner seeks to require the University to prove its compliance with Chapter 119, even though Petitioner bears the burden of proving the University’s non-compliance as a matter of law. *See Executive Office of Governor v. Florida Ctr. for Gov’t Accountability, Inc.*, 408 So. 3d 839, 844 (Fla. 1st DCA 2025), *reh’g denied* (Apr. 28, 2025) (“In announcing its ruling, the circuit court misplaced the burden of proof on the defendant Office.”).

5. Under Florida law, the Court must first adjudicate the University’s compliance with Chapter 119 on an accelerated basis before Petitioner engages in discovery. Petitioner’s discovery is therefore abusive and imposes an undue burden and expense on the University, especially where Petitioner has failed to present any ultimate facts showing the University did not comply with Chapter 119.

Compliance with Chapter 119 is an Immediate Threshold Issue

6. “Whenever an action is filed to enforce the provisions of [Chapter 119], the court shall set an immediate hearing, giving the case priority over other pending cases.” Section 119.11(1), Fla. Stat. (2026). This section makes it clear that proceedings under Chapter 119 are to be conducted on an accelerated basis. “[A]n accelerated civil action plays a critical role in the enforcement of the Public Records Act, as is reflected in the title of section 119.11—‘Accelerated hearing; immediate compliance.’” *Bd. of Trustees, Jacksonville Police & Fire Pension Fund v. Lee*, 189 So. 3d 120, 124 (Fla. 2016).

7. In Chapter 119 proceedings, as a threshold matter, the Court must first and foremost adjudicate the issue of whether the University produced the public records requested by Petitioner. *See Morris v. City of Miami*, 402 So. 3d 424, 426 (Fla. 3d DCA 2024); *see also News-Press Pub. Co., Inc. v. Gadd*, 388 So. 2d 276, 278 (Fla. 2d DCA 1980) (finding that “[t]he only viable issues in this action are whether the documents sought are public records and, if so, whether there are any statutory exceptions to public inspection of such documents”).

8. Thus, at this stage in the proceedings, the only issue to be determined is whether the University complied with Chapter 119. *See Morris v. City of Miami*, 402 So. 3d 424, 426 (Fla. 3d DCA 2024) (finding the issue of “whether the City had complied with its chapter 119 obligations” to be a crucial “threshold determination”).

9. Because Florida law requires accelerated disposition of Chapter 119 cases, it is simply not practical to engage in full-scale civil discovery, such as that propounded by Petitioner. The Florida Rules of Civil Procedure support this position. *See* Fla. R. Civ. P. 1.280(a)(2) and 1.200(a)(13) (removing mandamus cases filed under R. 1.630 from mandatory initial discovery disclosures and from case management procedures, respectively).

10. In this case, the record shows that the University initially received a public records request from Petitioner on March 26, 2026, generally seeking documents related to himself:

I am requesting access to inspect and copy public records **related to myself** and ongoing litigation for which I sought help from the Brechner Institute. (App. 4 (emphasis added)).¹

11. The University utilized search terms supplied by Petitioner and located documents which fell into three categories: (1) responsive public records, (2) **non**-responsive public records, and (3) documents which were not public records. On May 4, 2026, the University delivered the category (1) documents to Petitioner, but Petitioner took issue with the production.

12. In response, the University, through its Records Custodian, specifically and clearly asked Petitioner if he wanted the documents from category (2):

The university did locate public records that contain the search term ‘Hanson,’ which relate to individuals who are not you, but have the same last name. **Do you seek those public records?** (App. 74 (emphasis added)).

13. Petitioner expressly and adamantly rejected such records:

The answer is no - I don’t want all UF communications that contain ‘Hanson.’ My March 26, 2026 request was **not a request** for every record at the University of Florida containing the word ‘Hanson.’ (App. 75 (emphasis added)).

14. This response from Petitioner is important because he admits that category (2) documents (which show his last name but are not related to him) are **not responsive** to his public records request. In other words, the University’s decision to not produce the category (2) records did not violate Chapter 119.

¹ References denoted “App. ____” are references to Petitioner’s *Notice of Filing Appendix A-G to Verified Petition for Writ of Mandamus*. To ease access to these documents, the referenced pages are appended as **Exhibit B** to this motion with quoted language highlighted.

15. As for category (3), the University is not obliged to produce documents that are not considered public records under Chapter 119, and so these documents were not produced in response to Petitioner's request. Taken together, the record shows that the University, acting reasonably and in good faith, gathered and produced the responsive public records requested by Petitioner. *See* § 119.07(1)(c).

The University Has Submitted Competent Substantial Evidence

16. The University has submitted an affidavit from its Director of Public Records (and Records Custodian), John Hines, attesting to these dispositive facts. Mr. Hines' affidavit, based on his own personal knowledge, constitutes competent substantial evidence of the University's compliance with Chapter 119.² *See* Fla. R. Civ. P. 1.510(c)(4) ("An affidavit or declaration used to support or oppose a motion must be made on personal knowledge, set out facts that would be admissible in evidence, and show that the affiant or declarant is competent to testify on the matters stated."); *see also Martinez v. Lebron*, 284 So. 3d 1146, 1149 (Fla. 5th DCA 2019) (finding an affidavit to be "[c]ompetent substantial evidence" supporting the trial court's finding).

17. Now that the University has offered unrebutted evidence supporting its position, the burden shifts back to the Petitioner. "In suing an agency for violating Chapter 119, a plaintiff must prove they made a specific request for public records, the agency received it, the requested public records exist, and the agency improperly refused to produce them in a timely manner." *Executive Office of Governor v. Florida Ctr. for Gov't Accountability, Inc.*, 408 So. 3d 839, 844 (Fla. 1st DCA 2025), *reh'g denied* (Apr. 28, 2025) (cleaned up).

² *See Affidavit of University of Florida Records Custodian in Support of Response to Verified Petition for Writ of Mandamus*, attached as **Exhibit C**.

Petitioner Has No Competent Evidence to Support His Petition

18. For his part, Petitioner has not, and cannot, offer any evidence of the University's non-compliance beyond his own speculation and inference:

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. (Petition, ¶ 12).

19. Petitioner's inference is not enough. "The competent substantial evidence standard is not satisfied by evidence which merely creates a suspicion or which gives equal support to inconsistent inferences. Surmise, conjecture or speculation have been held not to be substantial evidence." *Callwood v. Callwood*, 221 So. 3d 1198, 1202 (Fla. 4th DCA 2017) (citing *Fla. Rate Conference v. Fla. R.R. & Pub. Utils. Comm'n*, 108 So.2d 601, 607 (Fla. 1959)).

20. Petitioner knows that he cannot allege ultimate facts supporting his claims, so he now seeks to use civil discovery solely to locate facts which might support his inferences. Nonetheless, it is improper for Petitioner "to use discovery as a substitute for requiring allegations of ultimate facts." *Rios v. McDermott, Will & Emery*, 613 So. 2d 544, 545 (Fla. 3d DCA 1993).

21. The topics of Petitioner's discovery requests, such as the University's motives and search techniques, are beyond the scope of the immediate issue and seek to accomplish through litigation what Petitioner has no right to under Chapter 119, such as the creation of a privilege log and sworn certifications. Moreover, Petitioner has raised no viable factual allegation that the University's search for responsive records violates Chapter 119.

Discovery is Not Warranted until the Court Resolves the Threshold Issue

22. For good cause shown, the court may make any order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense that justice requires. *See* Fla. R. Civ. P. 1.280(d). Here, good cause exists because Petitioner seeks to use discovery to force

the University to shoulder Petitioner’s burden. Because the only issue now before the Court is whether the records produced to Petitioner complied with Chapter 119, Petitioner’s far-reaching discovery requests are abusive and present an undue burden on the University to expend resources.

23. This is especially true where the discovery is a fishing expedition for Petitioner to find support for his speculative inferences. As such, the discovery is unwarranted, irrelevant, and out of proportion to the needs of the case. This includes Petitioner’s interrogatories, requests for admission, notices of deposition, and all but one of his requests to produce.³

24. To assist the Court in resolving the threshold issue of whether the University produced the public records requested by Petitioner, the University has attached as **Exhibit D** the documents falling into categories (1) (pages 1-53), (2) (pages 54-302), and (3) (pages 303-479) that the University gathered using Petitioner’s search criteria.⁴ The inclusion of these documents also effectively responds to the lone discovery request from Petitioner that is relevant to the issue before the Court.⁵

25. The University respectfully requests that the Court examine the attached documents in light of the record before the Court to determine the crucial threshold issue of whether the University responded to Petitioner’s public records request. “If, indeed, the [University] has complied, then **further discovery is obviously unnecessary**[.]” *Morris v. City of Miami*, 402 So. 3d 424, 426 (Fla. 3d DCA 2024) (emphasis added).⁶

³ See *Petitioner’s First Request to Produce to Respondents*—“REQUEST NO. 2. The gathered pages — the over 470 pages UFIT located in response to the Request (Hines Aff. ¶ 6) — or, for any gathered page the University withholds from production, an identification of that page sufficient to permit the Court’s in camera review of it, consistent with the University’s own offer to provide the gathered pages to the Court. (Response p. 3 n.5.)”

⁴ For ease of reference, these records also include Bates designations for each category. The records in category (2) have been redacted pursuant to 20 U.S.C. s. 1232g, as well as § 1006.52, Fla. Stat. (FERPA protected student educational information), and § 119.071(5)(b), Fla. Stat. (bank account information).

⁵ Petitioner’s first request for these documents (i.e., categories (2) and (3)) took place on July 13, 2026.

⁶ The University reserves the right to object to Petitioner’s discovery requests.

WHEREFORE, Respondent respectfully requests that the Court enter a protective order with respect to Petitioner's discovery requests until the Court determines the University's compliance with Chapter 119, and grant any other relief the Court deems proper.

Respectfully submitted,

/s/ James W. Kirkconnell
James W. Kirkconnell, Esq.
Florida Bar No.: 0021044
123 Tigert Hall
PO Box 113125
Gainesville, FL 32611-3125
(352) 392-1358
(352) 392-4387 Facsimile
jameswk@ufl.edu
Attorney for the University of Florida

CERTIFICATE OF CONFERRAL

I HEREBY CERTIFY that prior to filing this motion, I discussed the relief requested in this motion by telephone with the Petitioner on July 24, 2026, and Petitioner disagreed with the relief requested.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the undersigned counsel electronically filed the foregoing using the Florida Courts E-Filing Portal, which will generate a Notice of Electronic Filing to Petitioner at Petitioner's designated email address on this 30th day of July, 2026.

/s/ James W. Kirkconnell
James W. Kirkconnell, Esq.

TAB 21

EXHIBIT D: THE WITHHELD PAGES, FILED PUBLICLY

July 30, 2026

Docket 006, Ex. D, 479 pages at PDF pp. 32-510 (samples)

479 gathered, 53 produced to me, 426 withheld until UF attached all of it to a public court filing. Samples: Category 1 start, Category 2 start, UF internal HR email about a Brechner employee, third-party newsletters, a stranger's mass email, the duplicate copy of that same email, and the final page.

Exhibit D

From: cahanson77@yahoo.com

Sent time: 03/12/2026 10:51:13 AM

To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>

Subject: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

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Chris Hanson
FL Bar #44094
Phone: 727-409-5738

From: Cuillier, David
Sent time: 03/12/2026 11:57:50 AM
To: cahanson77@yahoo.com; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>
Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

Chris,

Thanks for reaching out. I'm not sure if we are the right people to help – we don't do legal work. We focus on research and education in access to public records (I have a Ph.D., not a J.D., so I can't give legal advice). I'm happy to chat with you, but I wouldn't be able to do so until late next week – I'm organizing a conference that runs Sunday-Tuesday in D.C. and under the gun. But could chat Thursday or Friday next week when I'm back in the office.

Dave

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Sent: Thursday, March 12, 2026 10:51 AM
To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
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Chris Hanson
FL Bar #44094
Phone: 727-409-5738

From: Bambauer, Jane
Sent time: 12/07/2024 10:53:01 PM
To: Ashutosh A Bhagwat <aabhagwat@ucdavis.edu>
Subject: Re: FEBRUARY 14, 2025: The Demand for Bullshit and How to Stop It

No worries. I understand entirely. See you at Eugene's thing!

Get [Outlook for Android](#)

From: Ashutosh A Bhagwat <aabhagwat@ucdavis.edu>
Sent: Saturday, December 7, 2024 5:49:34 PM
To: Bambauer, Jane <janebambauer@ufl.edu>
Subject: Re: FEBRUARY 14, 2025: The Demand for Bullshit and How to Stop It

[External Email]

Jane,

I apologize, but looking at my travel schedule and teaching load next spring (7 units), I've realized there is really no way I can manage to travel to Gainesville, given the travel time. I do hope you have a great conference; really sorry to miss it.

Ash
Ash Bhagwat
Distinguished Professor of Law and
Boochever and Bird Endowed Chair for the
Study and Teaching of Freedom and Equality
UC Davis School of Law
(530) 752-8687

Find my papers at:
<https://ssrn.com/author=193880>

From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Saturday, November 16, 2024 2:23 PM
To: Ashutosh A Bhagwat <aabhagwat@ucdavis.edu>
Cc: [REDACTED] <[REDACTED]@ufl.edu>
Subject: Fw: FEBRUARY 14, 2025: The Demand for Bullshit and How to Stop It

Ash,

So glad you might be able to come! See below...

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From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Saturday, November 16, 2024 2:17:05 PM
To: Coats, Janet <janetcoats@ufl.edu>; Shin,Jieun <jieun.shin@ufl.edu>; Inboden, William <inbodenw@ufl.edu>; Hutchens,Myiah <myiahhutchens@ufl.edu>; Lewis, Norman <nplewis@ufl.edu>; Carpenter, Nathan <nathancarpenter@ufl.edu>; Bridis,Theodore <tbridis@ufl.edu>; [REDACTED] <[REDACTED]>; Lidsky,Lyrisa <lidsky@law.ufl.edu>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Zach Weissmueller <zach.weissmueller@reason.com>; Yonathan Arbel <yarbel@law.ua.edu>; bwarmke@bgsu.edu <bwarmke@bgsu.edu>; ehinchman@fsu.edu <ehinchman@fsu.edu>; [REDACTED] <[REDACTED]@ufl.edu>; Jim Harper <[REDACTED]>; Robin D Hanson <rhanson@gmu.edu>; Bryan D Caplan <bcaplan@gmu.edu>; Agnes Callard <agcallard@uchicago.edu>; patrick@collision.ie <patrick@collision.ie>
Cc: [REDACTED] <[REDACTED]@ufl.edu>; Spiker, Ted <tspiker@ufl.edu>; McIlhenny, Ruth M. <ruthm@law.ufl.edu>; [REDACTED] <[REDACTED]@ufl.edu>; Irvin, Cheryl <cherylirvin@ufl.edu>
Subject: FEBRUARY 14, 2025: The Demand for Bullshit and How to Stop It

Hello!

I am so pleased that you are interested in joining us at UF for our partially-rescheduled "Demand for Bullshit" conference on February 14th. (This conference, which was originally planned for late October, has now been smooshed in with the "...and what to do about it" conference.)

We have an unbelievable lineup of speakers, including a keynote lunchtime conversation with Agnes Callard (U Chicago) and Patrick Collison (Stripe/Stripe Press) about Agnes' new book *Open Socrates* and a happy hour keynote with The Fifth Column podcast. On top of this, we have Bryan Caplan, Robin Hanson, and most of the originally-scheduled speakers from the Demand for Bullshit conference. It's too much! Too many great people with interesting problems and great ideas.

to discuss.

We will circulate a detailed agenda as soon as we get some [input from you](#), but here is the most important and basic information:

Schedule. We expect to have a conference dinner Thursday evening (February 13th), the conference on Friday (informal dinner of margaritas & tacos will be included for those who don't have Valentines plans), and a kayak outing on Saturday. Thus, if possible, please plan to fly into Gainesville Thursday and leave Sunday.

Travel and Lodging. We will cover all reasonable costs of travel. There is no need for you to arrange your own lodging: we have a conference hotel and will make a reservation in your name for you. Please hold onto all receipts, including for flights, airport parking, and local transportation.

Bring your sweethearts to the bullshit. We will reimburse reasonable travel costs of a spouse/partner to travel with you as well.

Public conference. Unlike the original "Demand for Bullshit" conference, this conference is entirely open to the public/broader UF community. Please keep this in mind as you consider what you will want to present.

Please fill out this form: <https://forms.gle/frKz47dSX2RKVFQb6>

And let us know if you have any other logistical questions.

Looking forward to this!

From: Cuillier, David
Sent time: 07/10/2025 04:09:30 PM
To: Reynolds, Keisha M <kereynolds@ufl.edu>
Subject: RE: Updates

Will do, Keisha. On it.

Best,

Dave

From: Reynolds, Keisha M <kereynolds@ufl.edu>
Sent: Thursday, July 10, 2025 3:10 PM
To: Cuillier, David <cuillierd@ufl.edu>
Subject: RE: Updates

Hi Dave,

Thank you for the additional information.

I appreciate the opportunity for us to meet to discuss current state of Sydney Sims' employment and performance objectives.

Per our conversation, a few takeaways:

- It is important that all employees hired meet minimum qualifications, with verified qualifications via reference checking and employment verification. If there are additional assessments that are required to further assess a candidate's strengths and abilities to perform the job, I am happy to work with you to achieve such goals. To review and assist with future hiring, please re-take Hiring AT UF by 8/1/25.
- Understanding differences and similarities from our team and those we lead, often takes time and resources. To assist you with understanding and managing unconscious behaviors to create a respectful culture and work environment, please register and complete training entitled, Conversations for a Culture of Belonging by 8/1/25.
- Understanding how our leadership style and mindset can impact our decisions and behaviors in the workplace is critical in leading effectively. Self-awareness is learned best when we can identify and manage assumptions and actions of others. Please register for The Mindful Leader and complete by 9/1/25.
- Performance Management is known to consume over 80% of a supervisor's time, as it requires intentional conversations and feedback. I encourage you attend future CJC leadership lunch and learns, starting again in fall.

Dave, I also encourage you to review additional leadership development opportunities via UFHR Training and Development, <https://hr.ufl.edu/professional-development/leadership-development/>.

Course information below:

Hiring AT UF

This course outlines the hiring process and reviews the behaviors, attitudes and stereotypes that can impact decisions at each stage. The course covers how to implement hiring strategies that help to avoid unfair hiring practices, how to prepare a job description or position profile, how to advertise the position to attract a competitive group of applicants, and how to establish behavioral based interview questions and answer anchors that support hiring. It also provides an overview of tools such as hiring rubrics and the ideal candidate profile.

Code: UF_GET251_OLT

Training organization: UF

Delivery method: Web Based

Contact: UF Training & Organizational Development, 352-392-4626

Owner: Sarah Angeline Hanson

Content type: Human Resources

Media type: Computer

Activity Filters:

Expertise: Beginner

Conversations for a Culture of Belonging

Do you engage with your colleagues in a way that brings out their best? Does your team collaborate in a way that combines the unique talents and abilities of each member to achieve big goals? In this discussion-based course, you will discover specific behaviors and strategies proven to increase engagement, innovation, and productivity in the workplace. Participants will recognize unconscious behaviors that derail a team's full potential and practice strategies to create a respectful culture that optimizes performance and produces great results. Embark on a shared journey with Gators Together!

Below are the additional details about this activity such as facility, location and so on.

Code: UF_GET245_ILT
Training organization: UF
Contact: UF Training and Organizational Development, 352-392-4626
Owner: Jennifer A Seitz

The Mindful Leader

Why should leaders care about mindfulness? We'll explore what research on leadership effectiveness tells us about the ways the mind shapes our behavior and ripples out to affect the teams we lead and our organization's overall effectiveness. By cultivating self-awareness, we can become more conscious of our automatic reactions, assumptions, and actions, which can help us make more skillful choices. You'll gain practical knowledge and tools to help you manage everyday stress and lead with authenticity and compassion. *This training is an elective for the Supervisory Challenge.*

Code: UF_SCS301_ILT
Training organization: UF
Contact: UF Training & Organizational Development, 352-392-4626
Owner: Jennifer A Seitz
Language: English (United States)

Regarding next steps, I am meeting with Janet Coats the first week of August to discuss Sydney's performance. Post assessment, I will meet with Hub to finalize next steps.

If you have any questions regarding the training outlined in this email, or any topics we discussed on yesterday, please feel free to reach out.

Thanks!

Regards,

Keisha

 **Keisha M. Reynolds, MLS, CLRP**
Human Resources Director
College of Journalism and Communications
University of Florida
352-273-1093
kereynolds@ufl.edu
[Book time with Reynolds, Keisha M](#)

From: Cuillier, David <cuillierd@ufl.edu>
Sent: Wednesday, July 9, 2025 9:53 AM
To: Reynolds, Keisha M <kereynolds@ufl.edu>
Subject: Updates

Keisha,

Thanks for taking time to chat yesterday. I appreciate your feedback and look forward to landing this plane. Some follow-up, as requested:

1. **Duties/performance:** I put together the duties/responsibilities for the outreach coordinator position, as advertised, and Sydney's performance in relation to the duties. Attached.
2. **Minimum qualifications:** I reviewed the posted minimum qualifications for the position, and I would say that on paper, she met them. Granted, it is a bit subjective ("A bachelor's degree in an appropriate area and six years of relevant experience, or an *equivalent combination of education and experience*."). While just 4.5 years in the media, not 6, she did have additional experience that I accounted for that put it across the finish line, technically (e.g., event planning with her family business, experience at Capital B in community engagement, including events, fellowships with Investigative Reporters and Editors and the Association of Health Care Journalists).
3. **After-hour emails:** I went through my email sent folder going back to Jan. 1, and did not find a pattern of bothering her weekends or after hours. Out of about 560 emails sent, I found a dozen sent after hours (2%). Of those, two were sent on weekends – one directly relevant to that day while we worked, firming up dinner arrangements for later that night with award winners; and one while we worked the NICAR conference on a weekend, March 7). There were some emails after hours on weekdays, but they were necessary, such as while we were working Sunshine Fest in D.C. in March, or providing her edited copy that she turned in late so we could get caught up. A few emails were in response to her emailing me after hours, to be responsive to her. I think a review of my sent emails would demonstrate a pattern of respecting her private time by avoiding needless queries after hours,

Steven Hornik, University of Central Florida
F. E. Guerra-Pujol, University of Central Florida, Pontifical Catholic University of Puerto Rico
Leigh Rosenthal, University of Central Florida

■ **Custom GPT Tutors in Managerial and Cost Accounting: An Instructional Case**

Elizabeth Felski, State University of New York at Geneseo

■ **Butterflies that Talk and Sense: Tangible Designs for Young Children's Environmental Sensemaking**

Chimi Om, Queensland University of Technology
Kellie Vella, Queensland University of Technology
Tshering Dema, Queensland University of Technology
Bernd Ploderer, Queensland University of Technology
Karen Murcia, Curtin University
Madeleine Dobson, Curtin University
Margot Brereton, Queensland University of Technology

■ **Foundations of Quantitative Social Science Research: Research Question Formation and Operationalization**

Wanhong Huang, Independent Researcher

■ **Dynamic Normative Feedback Model: Organising Ethical Feedback Systems in Knowledge-based Teams**

Gijs Ruesink, *affiliation not provided to SSRN*
Roderick Willeboordse, *affiliation not provided to SSRN*

■ **Active, Interactive, Innovative: Management Students' Experiences with Active Learning Innovations**

Zahra Hosseinifard, University of Melbourne - Faculty of Business and Economics
Angelito Calma, The University of Melbourne
Ashley Hanson, *affiliation not provided to SSRN*

[^top](#)

SOCIAL SCIENCES EDUCATION eJOURNAL

■ **"Functional Competency of Agriculture Extension Workers in the Philippines"**

RUTH ORTEGA-DELA CRUZ, University of the Philippines Los Baños
Email: raortegadelacruz@up.edu.ph

This study aimed to assess the functional competency level of agricultural extension workers (AEWs), as the sector's non-formal education service providers in the Philippines. The study employed a mixed methods approach by integrating both qualitative and quantitative methods. Data were analyzed using descriptive and inferential statistics. Results showed that the functional competencies of AEWs are at an average level, with four competencies rated as high namely extension methods and tools, agricultural extension programme management, adult learning of behavioral change, and community mobilization. Meanwhile, the role of extension in supporting value chain, agricultural entrepreneurship, and risk mitigation and adaptation in extension and advisory services ranked as the lowest competencies. Results also showed that there are significant relationships between current competencies and years of service in the local government units, highest educational attainment, and years as focal persons in banner commodity programs. This study shall build an understanding of the current level of functional competencies of AEWs in the Philippines. Results could also be considered as a basis for adult educators in designing curriculums and adopting methods and strategies fitting for the professional needs of AEWs not only in the Region and other parts of the world.

■
■

■ **An Epistemic Failure Atlas of Digital Learning Research Mapping Structural Failures in Contemporary Educational Psychology**

■ 

JÉRÔME JAOUAD YOUSFI, American University of Malta
Email: 

Contemporary educational psychology increasingly operates in data-rich, digitally mediated learning environments in which predictive performance is often treated as a proxy for theoretical adequacy. This article introduces an Epistemic Failure Atlas as a diagnostic framework for identifying recurrent structural failures in knowledge production that persist despite methodological rigor and empirical success. Rather than proposing a new explanatory model, the Atlas maps seven epistemic failure modes that systematically reduce epistemic resolution while preserving or amplifying empirical resolution. These failures emerge through cumulative shifts in how prediction, measurement, constructs, context, normativity, and interdisciplinary concepts are epistemically positioned. The contribution is deliberately non-empirical and non-prescriptive. Its aim is to render visible a set of recurrent inferential patterns that obscure theoretical limitations by redistributing explanatory authority toward optimization and scalability. By distinguishing epistemic from empirical resolution, the Atlas offers a cartographic perspective on why educational psychology can remain operationally effective while conceptually stagnant. The framework is intended as a preliminary diagnostic instrument, enabling subsequent theoretical work to proceed with greater conceptual clarity and epistemic restraint.

■ **"Professional AI Fluency in Marketing: Domain Instantiation, Competency Mapping, and Illustrative Course Design"**

VALERIE CHUKHLOMIN, State University of New York - Empire State University

In the contemporary landscape, AI literacy is no longer sufficient for marketing professionals. The current demand is for the capability to produce reliable, verified, and strategically sound work utilizing AI, rather than merely experimenting with prompts. This working paper introduces Professional AI Fluency (PAF)-Marketing, a practical framework designed to bridge the gap between theoretical knowledge of AI and its practical application in the workplace. Building upon the PAF-Business generic framework (Chukhlomin, 2026), PAF-Marketing elucidates how general AI fluency can be translated into marketing-specific competencies. The framework aligns eight fluency pillars with the American Marketing Association's competency model, identifies artifacts that demonstrate genuine capability, and establishes clear benchmarks for what constitutes excellence at each stage of development. Furthermore, the paper elaborates on PAF-Marketing Planning for Small Business and provides an overview of MRKT 4060, an eight-week credit-bearing course in which students develop a comprehensive 90-day marketing plan using Google Gemini Advanced, NotebookLM, and Custom Gems. Participants learn to generate and verify AI outputs, substantiate claims with evidence, document their reasoning, and construct reusable workflows. This framework is intended to assist marketing educators, corporate trainers, and researchers in identifying practical pathways from AI awareness to exemplary professional performance with GenAI.

"Introducing Soviet Union's Planned Economy: China's First Five-Year Plan Achieved Brilliant Accomplishments "

QIANQIAN WANG, College of Economics and Management, Kashi University

Email: [REDACTED]

XIAOYANG MA, College of Economics and Management, Kashi University

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TAOLI ZHANG, College of Economics and Management, Kashi University

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JIANG TAO, Nankai University

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The planned economic system in the Stalin period is of great significance in the whole economic development history of the Soviet Union. Summarize the research results of the planned economic system in this period can also be a reference for China's economic system reform in the new era. This paper examines the profound influence of the Soviet Union's planned economy on the formulation, implementation, and success of New China's First Five-Year Plan. Drawing upon an extensive review of the key Chinese studies and influential Western works, the paper analyzes the Soviet centralized planning system and the Soviet support to New China's ambitious development program. The research explores; the main achievements of the Soviet planned economy; the multifaceted factors that drove New China to adopt and adapt these methods; the detailed process including Soviet intervention of formulating and adjusting the First Five-Year Plan; the key statistical data that confirm the completion of main economic indicators; the lasting impact of the plan on China's economic development prior to reform and opening up; the critical discussion on China's experience and shortcomings in implementing the planned economy and the insights drawn from quantitative studies assessing the relationship between Soviet aid and 1 The paper is presented at the 82nd MPSA Annual Conference in Chicago in April 2025 China's industrial output. These findings suggest that while Soviet planning techniques and its assistance were instrumental in achieving rapid industrial construction, the rigid transplanting of foreign models also created structural challenges that later required reform. This study thus contributes to our understanding of early Sino-Soviet economic cooperation and the foundational role of state-led planning in China's modernization.

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"Jung, Shadow, and Sex: An Exploration in Psychoanalytic and Poststructuralist Thought

A Tripartite Psychoanalytic Interrogation: Freud's Id, Jung's Shadow Archetype, and Lacan's Structural Registers in the Dialectics of Repression, Erotic Desire, and Psychic Ontology

"

MARIIA PANASIUK, Independent Researcher, IIHSR European University

Email: [REDACTED]

The shadow, as conceptualized by Carl Gustav Jung, constitutes one of the most primordial and structurally indispensable elements of the human psyche. Unlike the ego, which maintains a precarious coherence through conscious identification, or the persona, which serves as the socially adaptive mask, the shadow encompasses all those aspects of personality that the conscious mind deems unacceptable, inferior, or incompatible with the idealized self-image. Jung describes it as "that hidden, repressed, for the most part inferior and guilt-laden personality" whose ramifications extend into the archaic layers of the collective unconscious, reaching back to our animal ancestors (Jung, 1959/1969, CW 9ii, para. 14). Within this archetypal domain, sexuality emerges not as a peripheral phenomenon but as a central, volatile constituent—intertwined with instinctual life forces, aggressive impulses, and the raw potency of the life instincts themselves.

Jung's divergence from Freud is instructive here. While Freud anchored the unconscious primarily in repressed sexual drives (libido), viewing the psyche through the lens of Oedipal conflict and the pleasure principle, Jung relocated sexuality within a broader archetypal matrix. He acknowledged the sexual instinct as fundamental yet insisted that it participates in a transpersonal, symbolic order that transcends mere biological discharge. In this view, the shadow does not merely contain "repressed" sexual contents in the Freudian sense; rather, it harbors the unacknowledged potency of Eros itself—Eros as both creative union and destructive fusion, capable of manifesting in forms that society and the ego alike experience as threatening. The shadow thus becomes the repository of those sexual energies that threaten the fragile boundaries of civilized identity: polymorphous desires, incestuous fantasies, sadistic and masochistic urges, and the aggressive undercurrents that Freud later theorized as the death drive (Thanatos) but which Jung reframed as an autonomous archetypal force.

From: Lisa Magness <[REDACTED]>

Sent time: 03/03/2026 06:55:40 PM

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To: [REDACTED]; [REDACTED]; jason@digitalcontentnext.org; [REDACTED]; [REDACTED]

Cc: [REDACTED]

Subject: 911 EMERGENCY - I NEED SOMEONE IN AMERICA TO STOP DONALD TRUMP, ELON MUSK, AND RUSSIA FROM KILLING ALL OF US AND STALKING ME LIKE HUMAN PREY!

[External Email]

I find the ignorance that you dare to believe you, your families, or your businesses are safe in a Russian dictatorship profound. How could you possibly be safe when Nevada, Trump, Musk, Obama, Biden, Clinton, Bush, Miriam Adelson, Steve Wynn, Congress and the US Military are still trying to kill me some 9 YEARS LATER! Go ahead, I dare you to tell me what is so awesome about George W. Bush, Donald Trump, and Elon Musk's dicks that you are willing to die to save their Russian treason? Because you won't survive them. Any of them.

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The Guthrie kidnapping WAS NO ACCIDENT. IT WAS RIGGED BY DC as a warning shot across the bow of the American media and press industry. To keep their mouths shut about our Russian dictatorship or Washington DC will escalate to murdering media and press figures and/or their family members. Therefore, Americans please pull your ignorant heads out of your ignorant asses before we all end up dead by Russia.

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Twitter @USIdiotsAbout**

LISTEN THE INSANE IDEA THAT DONALD TRUMP IS GOING TO SPEAK WITH IRAN HAS GOT TO GO!!! AMERICA is not legitimate as a Russian dictatorship!!! FULL FUCKING STOP! So, Category 3

where is the certified insanity coming from where America's Russian dictatorship will remain in power to speak with IRAN. What fucking planet are we living on where that is SANE WHATSOEVER!!!! AMERICA doesn't have the grounds to ask IRAN for jack shit. ESPECIALLY, NOT WHEN AMERICA literally built Russia's nuclear arsenal over the last two decades to match ours. THE CERTIFIED CRAZY CONTINUES to kill us by the second. Will anyone ever get a hold of it? And the Russian mercenaries who still illegally surround me are still bouncing off the wall. Are Americans really that hellbent to die by Russia? Please tell me that isn't so.

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SOCIAL SCIENCES EDUCATION eJOURNAL

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Miguel Varela, *affiliation not provided to SSRN*

Alfonso Moro, *affiliation not provided to SSRN*

Rui Caldeira, *affiliation not provided to SSRN*

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Ni Putu Wulan Purnama Sari, Widya Mandala Surabaya Catholic University

Minh-Phuong Thi Duong, Ton Duc Thang University

Viet-Phuong La, Phenikaa University

Manh-Tung Ho, Phenikaa University - Center for Interdisciplinary Social Research, Institute of Philosophy, Vietnam Academy of Social Sciences, Hanoi, Vietnam

Thi Mai Anh Tran, Michigan Technological University, Phenikaa University

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Keri White, University of Central Florida

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EXHIBIT J

Petitioner's discovery served July 13, 2026: First Set of Interrogatories, First Requests for Admission, and First Request for Production, with transmittal. Filing 255482220, August 24, 2026.

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

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

Petitioners,

v.

Case No.: 01-2026-CA-001794

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

Respondents.

**NOTICE OF FILING DISCOVERY SERVED JULY 13, 2026,
WITH TRANSMITTAL**

PLEASE TAKE NOTICE that Petitioner files the following, each a true and correct copy of the document as served, for use at the August 24, 2026 Case Management Conference, at which the Court will hear Respondents' Motion for Protective Order directed to this discovery and Petitioner's Cross-Motion to Set an Expedited Evidentiary Schedule:

1. Transmittal e-mail of July 13, 2026, 1:57 PM, from Petitioner to Respondents' counsel, whose attachment list identifies each document below by file name (2 pages);
2. Petitioner's First Set of Interrogatories to Respondents (3 pages);
3. Petitioner's First Requests for Admission to Respondents (3 pages);
4. Petitioner's First Request to Produce to Respondents (3 pages);
5. Petitioner's Public Records Request No. 2 to the University, served with the same transmittal (2 pages).

The interrogatories, requests for admission, and requests for production are filed because they are used in a proceeding: they are the subject of Respondents' pending Motion for Protective Order, and Respondents themselves filed copies as Composite Exhibit A to that motion (Docket 006, July 30, 2026). Responses to the attached discovery were due August 12, 2026. As of the date of this filing, no answers, objections, or responses have been served.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, with its attachments, was served by the Florida Courts E-Filing Portal on August 24, 2026, on James W. Kirkconnell, Esq. (jameswk@ufl.edu) and Kristen LoGiurato (klogiurato@ufl.edu), Attorneys for Respondents.

/s/ Christopher A. Hanson
Christopher A. Hanson, Esq., Florida Bar No. 44094
Petitioner, pro se, and as attorney and next friend
for his two minor children
cahanson77@yahoo.com | 727-409-5738

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: christophhanson77@gmail.com; universityofflorida@mycusthelp.net; jameswk@ufl.edu

Date: Monday, July 13, 2026 at 01:57 PM EDT

Dear Mr. Kirkconnell:

I am drafting the Reply to the University's Response to the Order to Show Cause. I may need an extra 5–7 days to finish the reply. Do you have any objection to an extension of 7 days?

Additionally, efficiency is my primary objective here. I have encountered enormous, unnecessary obstacles and delays in the courts over the past two years. What I am requesting from UF is simple. I write separately to give the University the opportunity to resolve the core of this case without further judicial time.

1. Demand for production. Mr. Hines has sworn that UFIT "gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty." (Hines Aff. ¶ 6.) The University produced 53 pages — its correspondence directly with me — and nothing else, explaining the difference only as records that "did not meet the definition of public records" or "concerned individuals having the surname Hanson, but with no relation to the Petitioner." (Hines Aff. ¶ 7.)

The University judged my own letters responsive and produced additional copies back to me; and everything I did not already possess, it withheld. On behalf of Petitioners, I ask that the University produce the remainder of the located pages now. If the University maintains that any located page is exempt, is not a public record, or is not responsive, please identify each such page and state the basis with particularity — whichever of those grounds applies — consistent with the burden the University's own cited authority places on the party resisting production. A response within five (5) business days would allow the parties to narrow the issues before the Court takes them up.

To be clear, the correspondence the University returned to me is not what this case is about. The matters requiring attention are the records I do not have — including the case-number and keyword material the University's filings have not yet addressed. Those issues are framed in the enclosed discovery rather than argued in this letter. I am including the contact for the records custodian department due to the additional public records request attached here to

2. Discovery. Served with this letter are Petitioner's First Requests for Admission, First Set of Interrogatories, and First Request to Produce, each directed to the facts the University itself put in issue through the Hines affidavit: what was searched, what was found, what was withheld, and on what stated basis. Given the statutory priority of this action under Section 119.11(1), Florida Statutes, Petitioner requests that the University respond on an expedited basis; if the University believes discovery in this proceeding requires leave of court or a different schedule, please say so promptly and Petitioner will take the question to the Court rather than let it lie.

3. Depositions. Please provide, within seven (7) days, available deposition dates within the next thirty (30) days for each of the following:

(a) **John Hines**, whose affidavit the University has placed at the center of its Response, and who swears he personally "delivered the responsive public records to Petitioner" on May 4, 2026 (Aff. ¶ 8) — a delivery made by an email that, like every University communication concerning the Request, identified no individual by name or title;

(b) **A University designee under Rule 1.310(b)(6)** with knowledge of the handling of Request No. W018463-032626 — including the identity and role of each person who authored, reviewed, or approved the University's communications to me of March 26, April 23, May 4, and May 8, 2026, each sent unsigned from the University's records-portal mailbox notwithstanding my express, repeated requests that the responsible individual be identified; the searches actually run; and the disposition of the gathered pages; and

(c) **Mr. David Cuillier**, whose correspondence with me constitutes the entirety of the University's production and whose records bear directly on the adequacy of the University's search.

Petitioner offers to coordinate scheduling cooperatively; if the parties are unable to coordinate, Petitioner will raise scheduling with the Court at the Section 119.11(1) hearing. If the University contends that any deposition in this proceeding requires leave of court, please say so promptly.

4. Preservation. Demand is renewed that the University preserve, and direct UFIT and all personnel to preserve: the 470+ pages gathered; all UFIT search outputs, hit lists, queries, and logs associated with request W018463-032626; the May 4, 2026 delivery package; and all records concerning the handling of the request — on every system and backup where they reside, with associated metadata, and with any automatic deletion or overwriting suspended.

This correspondence is written to resolve issues, not multiply them. If the University will produce the located records or lodge them with the Court per its own footnoted offer, much of what follows becomes unnecessary. I look forward to your prompt response.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner



PRR 2 TO UF.pdf
99.6



Rogs to UF.pdf
101.1



RFAS to UF.pdf
123



RTP to UF.pdf
122.9

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

CASE NO.: 01-2026-CA-001794

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.

_____ /

PETITIONER'S FIRST SET OF INTERROGATORIES TO RESPONDENTS

Petitioner, Christopher A. Hanson, pursuant to Florida Rule of Civil Procedure 1.340, propounds the following interrogatories to Respondents, the University of Florida Board of Trustees and the Custodian of Public Records, University of Florida (collectively, the "University"), to be answered separately and fully in writing under oath within thirty (30) days of service.

Definitions

1. **"Request"** means the public-records request assigned tracking number W018463-032626, submitted by Petitioner on or about March 26, 2026, including its Categories A, B, and C as reproduced at page 2 of the University's Response.
2. **"UFIT"** means the University of Florida Information Technology unit referenced in paragraph 6 of the Affidavit of John Hines.
3. **"Gathered pages"** means the over 470 pages of documents UFIT located in response to the Request (Hines Aff. ¶ 6). **"Produced pages"** means the documents delivered to Petitioner on

May 4, 2026. **"Identify,"** as to a person, means state the person's name, title, and role; as to a document or communication, means state its date, author, recipients, and subject.

Instructions

4. Answer each interrogatory separately and fully in writing under oath, or object with specificity, within thirty (30) days of service. Rule 1.340(a). If any answer would change, the University is under a continuing duty to supplement. This action is entitled to statutory priority under Section 119.11(1), Florida Statutes; consistent with that priority and Petitioner's accompanying letter, Petitioner requests expedited answers.

Interrogatories

INTERROGATORY NO. 1. Identify each search term the University or UFIT actually ran in response to the Request. For each term, state: (a) the exact term or query as run; (b) the date it was run; (c) the system, database, or repository against which it was run; (d) the scope searched (including each custodian, mailbox, account, or drive covered); and (e) the number of items or pages it returned. (f) If any term identified in the Request — including any of the six Category B case numbers or the Category C keywords, individuals, and subjects reproduced at page 2 of the Response — was NOT run, identify each such term and state why it was not run.

INTERROGATORY NO. 2. Identify each person who performed the searches described in your answer to Interrogatory No. 1; each person who reviewed or "parse[d] through" the gathered pages (Hines Aff. ¶ 7); and each person who authored, sent, or approved any communication to Petitioner concerning the Request; and state the criteria applied in determining whether each gathered page was produced, withheld as a non-record, or withheld as concerning an unrelated individual.

INTERROGATORY NO. 3. State the total number of pages the University produced to Petitioner in response to the Request and the total number of gathered pages the University did not produce; and for the pages not produced, state the number attributable to each stated ground — (a) not a public record, (b) concerning an individual with the surname "Hanson" unrelated to Petitioner, and (c) any other ground, describing that ground.

INTERROGATORY NO. 4. Describe the form and location in which the UFIT search outputs are maintained, including the file format(s), the system(s) on which they are stored, whether they can be exported, and the identity of the person or unit that maintains them.

INTERROGATORY NO. 5. Identify every repository, system, account, or device within the University's custody or control that was NOT searched in response to the Request but that could contain records responsive to it — including without limitation email accounts, text-message and instant-messaging platforms, shared network drives, cloud storage, and any personal accounts or devices used by University personnel to conduct University business.

INTERROGATORY NO. 6. Identify each person who participated in the decision not to produce the balance of the gathered pages, and for each, state that person's role in the decision.

INTERROGATORY NO. 7. State whether any gathered page has been altered, deleted, moved, overwritten, or become unavailable since it was located in response to the Request; and if so, identify each such page and describe what occurred, when, and by whom.

INTERROGATORY NO. 8. Identify each communication (excluding communications protected by the attorney-client privilege or work-product doctrine, which shall be logged) in which any person determined that a gathered page was not a public record or concerned an unrelated individual, stating the date of each such communication and its participants.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of July, 2026, a true and correct copy of the foregoing was served through the Florida Courts E-Filing Portal and by email on James W. Kirkconnell, Esq., Attorney for the University of Florida, jameswk@ufl.edu, 123 Tigert Hall, PO Box 113125, Gainesville, FL 32611-3125.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

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

CASE NO.: 01-2026-CA-001794

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.

_____ /

PETITIONER'S FIRST REQUESTS FOR ADMISSION TO RESPONDENTS

Petitioner, Christopher A. Hanson, pursuant to Florida Rule of Civil Procedure 1.370, requests that Respondents, the University of Florida Board of Trustees and the Custodian of Public Records, University of Florida (collectively, the "University"), admit or deny the truth of each of the following matters within thirty (30) days of service.

Definitions

1. **"Request"** means the public-records request assigned tracking number W018463-032626, submitted by Petitioner on or about March 26, 2026, including its Categories A, B, and C as reproduced at page 2 of the University's Response to the Verified Petition.
2. **"UFIT"** means the University of Florida Information Technology unit referenced in paragraph 6 of the Affidavit of John Hines.
3. **"Gathered pages"** means the "over 470 pages of documents" the University's custodian swears UFIT located in response to the Request. (Hines Aff. ¶ 6.)

4. **"Produced pages"** means the documents the University delivered to Petitioner on May 4, 2026.

Instructions

5. Each matter is admitted unless, within thirty (30) days after service, the University serves a written answer or objection addressed to the matter, signed by the party or its attorney, as required by Rule 1.370(a). If the University cannot truthfully admit or deny a matter, it must state in detail why it cannot, and a denial must fairly meet the substance of the requested admission, qualifying an answer or admitting part and denying the remainder where a good-faith response so requires. Rule 1.370(a).

6. This action is a public-records mandamus proceeding entitled to statutory priority over other pending matters under Section 119.11(1), Florida Statutes. Consistent with that priority, and as set out in Petitioner's accompanying letter, Petitioner requests expedited responses in advance of the thirty-day period.

Requests for Admission

REQUEST NO. 1. In response to the Request, UFIT gathered over 470 pages of documents.

REQUEST NO. 2. UFIT gathered those pages using terms identified in the Request.

REQUEST NO. 3. The University's May 4, 2026 production to Petitioner consisted of two documents — an attachment of 50 pages and an attachment of 3 pages.

REQUEST NO. 4. The two documents produced on May 4, 2026 together total 53 pages.

REQUEST NO. 5. The University has produced no records to Petitioner in response to the Request beyond those 53 pages.

REQUEST NO. 6. The 53 produced pages consist entirely of correspondence to or from Petitioner.

REQUEST NO. 7. The University has not asserted any statutory exemption under Section 119.07, Florida Statutes, as to any record located in response to the Request.

REQUEST NO. 8. The University has not provided Petitioner an index, log, or count of the gathered pages.

REQUEST NO. 9. The University maintains records of the searches UFIT performed in response to the Request, including the queries run and/or their outputs.

REQUEST NO. 10. The gathered pages that the University did not produce to Petitioner have not been provided to the Court.

Respectfully submitted this 13th day of July, 2026.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com

727-409-5738

Self-represented Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this ____ day of July, 2026, a true and correct copy of the foregoing was served through the Florida Courts E-Filing Portal and by email on James W. Kirkconnell, Esq., Attorney for the University of Florida, jameswk@ufl.edu, 123 Tigert Hall, PO Box 113125, Gainesville, FL 32611-3125.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

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

CASE NO.: 01-2026-CA-001794

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.

_____ /

PETITIONER'S FIRST REQUEST TO PRODUCE TO RESPONDENTS

Petitioner, Christopher A. Hanson, pursuant to Florida Rule of Civil Procedure 1.350, requests that Respondents, the University of Florida Board of Trustees and the Custodian of Public Records, University of Florida (collectively, the "University"), produce for inspection and copying the following items within thirty (30) days of service, at the offices of Petitioner or by electronic delivery in native format.

Definitions

1. **"Request"** means the public-records request assigned tracking number W018463-032626, submitted on or about March 26, 2026, including Categories A, B, and C. **"UFIT"** means the University of Florida Information Technology unit (Hines Aff. ¶ 6). **"Gathered pages"** means the over 470 pages UFIT located in response to the Request. **"Produced pages"** means the documents delivered to Petitioner on May 4, 2026. **"Document"** has the meaning given in Rule 1.350 and includes electronically stored information.

Instructions

2. Produce each item within thirty (30) days of service. Rule 1.350(b). Where a document is withheld on a claim of attorney-client privilege or work-product protection, identify it and the basis of the claim in sufficient detail to permit assessment, as ordinary civil discovery practice under the Florida Rules requires. For clarity: nothing in this request asserts that Chapter 119, Florida Statutes, imposes any duty to create an index or log — the identification provisions here rest on the discovery rules alone. Electronically stored information shall be produced in its native format with metadata intact unless otherwise agreed. This action is entitled to statutory priority under Section 119.11(1), Florida Statutes; consistent with that priority and Petitioner's accompanying letter, Petitioner requests expedited production.

Requests

REQUEST NO. 1. The UFIT search outputs and hit lists generated in response to the Request, produced in native format.

REQUEST NO. 2. The gathered pages — the over 470 pages UFIT located in response to the Request (Hines Aff. ¶ 6) — or, for any gathered page the University withholds from production, an identification of that page sufficient to permit the Court's in camera review of it, consistent with the University's own offer to provide the gathered pages to the Court. (Response p. 3 n.5.)

REQUEST NO. 3. The May 4, 2026 delivery package to Petitioner, including the cover communication and both attachments, as maintained by the University.

REQUEST NO. 4. Documents sufficient to show, in the form kept in the ordinary course, the search terms run in response to the Request, the dates each was run, and the systems or repositories against which each was run.

REQUEST NO. 5. The University's request-processing file for W018463-032626, excluding communications protected by the attorney-client privilege or work-product doctrine (any such withheld communication to be identified on a privilege log).

REQUEST NO. 6. The University's policies, procedures, and guidelines governing the processing of public-records requests, and the records-retention schedules applicable to the categories of records sought by the Request.

REQUEST NO. 7. Documents sufficient to show the capabilities of the search tools UFIT used to respond to the Request, including what fields and repositories can be queried and what outputs can be exported.

REQUEST NO. 8. All communications between the University and UFIT concerning the search for, review of, and decision to produce or withhold records responsive to the Request, excluding

communications protected by the attorney-client privilege or work-product doctrine (any such withheld communication to be identified per Instruction ¶ 2).

Respectfully submitted this 13th day of July, 2026.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com

727-409-5738

Self-represented Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of July, 2026, a true and correct copy of the foregoing was served through the Florida Courts E-Filing Portal and by email on James W. Kirkconnell, Esq., Attorney for the University of Florida, jameswk@ufl.edu, 123 Tigert Hall, PO Box 113125, Gainesville, FL 32611-3125.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

July 13, 2026

James W. Kirkconnell, Esq.

Counsel for the University of Florida

jameswk@ufl.edu

RE: Transmittal, through counsel, of a public records request to the University of Florida under Chapter 119, Florida Statutes, and Article I, Section 24, Florida Constitution — records of the search and processing of Request No. W018463-032626

Dear Mr. Kirkconnell:

Because the University is represented in the pending action and the subject of this request overlaps it, I am directing this new public records request to the University through you, as its counsel of record, rather than to its records custodian directly, and I ask that you transmit it to the appropriate custodian upon receipt. This is a request under Chapter 119, Florida Statutes, and Article I, Section 24(a) of the Florida Constitution; it stands on the statutory right of access, independent of the pending action and of any question concerning the availability or timing of discovery there. The University may respond through you or through its custodian channel, at its option.

Under Chapter 119, Florida Statutes, and Article I, Section 24(a) of the Florida Constitution, Petitioner requests the following records of the University of Florida:

1. **The search outputs for Request No. W018463-032626:** the hit list(s), result list(s), export(s), or equivalent output generated by UFIT when it "gathered over 470 pages of documents" responsive to the request — in native format, with associated metadata.
2. **Records sufficient to show, for each search term used in processing that request:** the term as actually run; the date(s) it was run; the systems, repositories, and mailboxes searched; and the number of items or pages returned.
3. **Any index, log, inventory, or tracking record of the gathered pages,** including any record identifying which pages were produced and which were not, and on what basis — as such records exist; this item does not ask the University to create a record.
4. **The May 4, 2026 delivery package** for Request No. W018463-032626 as maintained by the University (the transmittal and its attachments), sufficient to confirm the contents and page count of what was produced.
5. **The University's current policies, procedures, or guidance** governing the processing of public records requests, including search methodology and review for exempt or non-record

material, and the applicable retention schedule(s) for search outputs and request-processing records.

6. If no responsive record exists for any item above: a written statement saying so as to each item individually.

If access to any responsive record is denied in whole or in part, please state the basis of the denial with particularity, including the specific exemption claimed and its factual basis, as Section 119.07(1)(e), Florida Statutes, requires, and produce all non-exempt portions. Effective immediately, I also demand preservation of all records described above, on every system and backup where they reside, with any automatic deletion or overwriting suspended.

Please acknowledge receipt and provide the records, or the written responses required above, promptly and in good faith. If fees apply, provide an itemized estimate before incurring them. Please direct all responses to cahanson77@yahoo.com.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

EXHIBIT L

Petitioner's Notice of Filing Certificates of Non-Appeal and
Deposition-Scheduling Correspondence, with Exhibits A through I.

*Interior pages carry this Notice of Filing's own tabs, lettered A through I. The
controlling designation is Hearing Exhibit L.*

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT IN AND FOR
ALACHUA COUNTY, FLORIDA
CASE NUMBER: 01-2026-CA-001794 Circuit Civil Division W

CHRISTOPHER A. HANSON, individually and as attorney for himself and as 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.

_____ /

**NOTICE OF FILING CERTIFICATES OF NON-APPEARANCE AND
DEPOSITION-SCHEDULING CORRESPONDENCE**

PLEASE TAKE NOTICE that Petitioner Christopher A. Hanson, self-represented, files the
following, each a true and correct copy as received or as sent, for use at the evidentiary hearing
set for September 2, 2026:

Exhibit A (composite p. 3). Certificate of Non-Appearance of John Hines, Director of Public
Records and Records Custodian, University of Florida, for the deposition noticed for August 3,
2026 at 3:00 p.m. by Zoom (court reporter Gunning).

Exhibit B (composite p. 5). Certificate of Non-Appearance of Professor Jane Bambauer for the
deposition noticed and subpoenaed for August 3, 2026 at 1:00 p.m. by Zoom (court reporter
Gunning).

Exhibit C (composite p. 7). Notice of Taking Deposition of John Hines, set for August 3,
2026, as served.

Exhibit D (composite p. 10). Notice of Taking Deposition of Professor Jane Bambauer, set for
August 3, 2026, as served.

Exhibit E (composite p. 13). Subpoena for Deposition of Professor Jane Bambauer, Fla. R.
Civ. P. 1.410.

Exhibit F (composite p. 17). Petitioner's July 13, 2026 email to Respondents' counsel
requesting available deposition dates.

Exhibit G (composite p. 20). Petitioner's July 24, 2026 email to Respondents' counsel serving
the deposition notices and the Bambauer subpoena.

Exhibit H (composite p. 26). Petitioner's August 25, 2026 email to Respondents' counsel regarding witnesses for the September 2, 2026 hearing.

Exhibit I (composite p. 29). Respondents' counsel's August 26, 2026 reply.

Petitioner states the following, which appears on the face of the attached documents:

1. On July 13, 2026, Petitioner asked Respondents' counsel to provide, within seven days, available deposition dates for the records custodian, a designee under Florida Rule of Civil Procedure 1.310(b)(6), and Dr. David Cuillier, and offered to coordinate scheduling cooperatively. Exhibit F.
2. On July 24, 2026, Petitioner served the attached notices and subpoena. The Hines deposition was noticed without a subpoena, on the stated basis that he is a managing agent of the University. In the same email Petitioner asked Respondents' counsel to state "whether the University will produce Mr. Hines for his deposition on this Notice without the need for a subpoena." Exhibit G.
3. Respondents did not answer that question. On July 30, 2026, Respondents filed a Motion for Protective Order. No order on that motion had been entered on or before August 3, 2026.
4. Neither witness appeared on August 3, 2026. Neither witness was released from appearance by Petitioner. The court reporter issued the attached certificates of non-appearance. Exhibits A and B. Petitioner placed a statement on the record before the court reporter on August 3, 2026; the transcript is available and will be furnished on the Court's request.
5. On August 25, 2026, Petitioner wrote to Respondents' counsel concerning witnesses for the September 2, 2026 hearing and proposed arrangements for service. Exhibit H. On August 26, 2026, Respondents' counsel replied that "[t]he University will present the testimony of its Records Custodian, John Hines, at the Hearing" and that "[t]he University does not agree to accept service of process for any other witness for the Hearing." Exhibit I.
6. The deposition notices and the Bambauer subpoena are also of record as part of Composite Exhibit A to Respondents' Motion for Protective Order, filed July 30, 2026.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, with Exhibits A through I, was filed with the Florida Courts E-Filing Portal on August 31, 2026, which will serve a Notice of Electronic Filing on James W. Kirkconnell, Esq., jameswk@ufl.edu, and Kimberly LoGiurato, Esq., klogiurato@ufl.edu, counsel for Respondents.

/s/ Christopher A. Hanson Christopher A. Hanson, Esq. Florida Bar No. 44094 [REDACTED]
[REDACTED] cahanson77@yahoo.com 727-409-5738 *Self-represented*
Petitioner

EXHIBIT A

CERTIFICATE OF NON-APPEARANCE

John Hines, Director of Public Records and Records Custodian, University of Florida

Deposition noticed for August 3, 2026, 3:00 p.m., by Zoom. Court reporter Gunning.

[Page 1]

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

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

Petitioners,

v.

Case No. 01-2026-
CA-001794

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

Respondents.

_____ /

CERTIFICATE OF NONAPPEARANCE

I, VALERIE GUNNING, Stenographic Reporter
and Notary Public, do hereby certify that I was present
by videoconference on August 3, 2026 at 3:00 p.m. for
the purpose of reporting the remote deposition of JOHN
HINES, Records Custodian, scheduled to begin at 3:00
p.m., and that JOHN HINES, Records Custodian, and
Respondents' counsel did not appear by 3:19 p.m.

Under penalties of perjury, I declare that I
have read the foregoing certificate and that the facts
stated in it are true. Dated this 3rd day of August
2026.

Valerie Gunning



Valerie Gunning, CRR
Vincent M. Lucente & Associates
1800 2nd Street, Suite 875
Sarasota, Florida 34236

EXHIBIT B

CERTIFICATE OF NON-APPEARANCE

Professor Jane Bambauer

Deposition noticed and subpoenaed for August 3, 2026, 1:00 p.m., by Zoom. Court reporter Gunning.

[Page 1]

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

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

Petitioners,

v.

Case No. 01-2026-
CA-001794

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

Respondents.

_____ /

CERTIFICATE OF NONAPPEARANCE

I, VALERIE GUNNING, Stenographic Reporter
and Notary Public, do hereby certify that I was present
by videoconference on August 3, 2026 at 1:00 p.m. for
the purpose of reporting the remote deposition of
PROFESSOR JANE BAMBAUER, scheduled to begin at 1:00
p.m., and that PROFESSOR JANE BAMBAUER and Respondents'
counsel did not appear by 1:20 p.m.

Under penalties of perjury, I declare that I
have read the foregoing certificate and that the facts
stated in it are true. Dated this 3rd day of August
2026.

Valerie Gunning

Valerie Gunning, CRR
Vincent M. Lucente & Associates
1800 2nd Street, Suite 875
Sarasota, Florida 34236



EXHIBIT C

NOTICE OF TAKING DEPOSITION

John Hines

Served July 24, 2026. Set for August 3, 2026.

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

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

v.

Case No.: 01-2026-CA-001794

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

_____ /

NOTICE OF TAKING DEPOSITION (VIA ZOOM VIDEOCONFERENCE)

PLEASE TAKE NOTICE that Petitioner, Christopher A. Hanson, will take the deposition upon oral examination of the following witness, before an officer authorized by law to administer oaths, at the date and time stated below, and continuing from day to day until completed:

Deponent: John Hines, Director of Public Records and records custodian for the University of Florida, and the affiant whose sworn affidavit was filed in support of Respondents' Response to the Order to Show Cause.

Date and time: Monday, August 3, 2026, at 3:00 p.m. (Eastern Time).

Method: The deposition will be taken by remote electronic means (Zoom videoconference) pursuant to Florida Rule of Civil Procedure 1.310(b)(4). The witness, the officer, and the participants may appear by remote videoconference, and the officer is authorized to administer the oath remotely. The Zoom connection details are set forth below.

Officer / court reporter: Vincent Lucente (vincentlucente.com), a notary public or other officer authorized by law to administer oaths. The testimony will be recorded stenographically and by simultaneous audiovisual means via the Zoom videoconference platform.

Zoom connection (the same meeting is used for both the 1:00 p.m. and 3:00 p.m. depositions):

Join Zoom Meeting:

[REDACTED]

[REDACTED]

[REDACTED]

One tap mobile: +1 786 635 1003 (US — Miami); +1 312 626 6799 (US — Chicago); [REDACTED]

[REDACTED]

Join by SIP: [REDACTED]

The deposition is being taken for purposes of discovery, for use at any hearing or trial in this action, and for all other purposes permitted under the Florida Rules of Civil Procedure. As the University's Director of Public Records, records custodian, and affiant in this proceeding, Mr. Hines is a managing agent of Respondent University of Florida Board of Trustees, and his attendance is required upon service of this Notice on Respondents' counsel without the necessity of a subpoena.

If the deposition is not completed on the date noticed, it will be continued from day to day thereafter until completed.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by email this 24th day of July, 2026, on James W. Kirkconnell, Esq. (jameswk@ufl.edu) and Kimberly LoGiurato, Esq. (klogiurato@ufl.edu), UF Office of General Counsel, counsel for Respondents.

Respectfully submitted,

s\Christopher Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

EXHIBIT D

NOTICE OF TAKING DEPOSITION

Professor Jane Bambauer

Served July 24, 2026. Set for August 3, 2026.

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

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

v.

Case No.: 01-2026-CA-001794

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

**NOTICE OF TAKING DEPOSITION OF NON-PARTY WITNESS (VIA ZOOM
VIDEOCONFERENCE)**

PLEASE TAKE NOTICE that Petitioner, Christopher A. Hanson, will take the deposition upon oral examination of the following non-party witness, before an officer authorized by law to administer oaths, at the date and time stated below, and continuing from day to day until completed:

Deponent: Professor Jane Bambauer, Professor of Law and Brechner Eminent Scholar at the University of Florida (Fredric G. Levin College of Law and College of Journalism and Communications), who, according to the sworn affidavit filed in support of Respondents' Response to the Order to Show Cause, provided records to the University's Director of Public Records in response to the search of public-records request No. W018463-032626.

Date and time: Monday, August 3, 2026, at 1:00 p.m. (Eastern Time).

Method: The deposition will be taken by remote electronic means (Zoom videoconference) pursuant to Florida Rule of Civil Procedure 1.310(b)(4). The Zoom connection details are set forth below.

Officer / court reporter: Vincent Lucente (vincentlucente.com), a notary public or other officer authorized by law to administer oaths. The testimony will be recorded stenographically and by simultaneous audiovisual means via the Zoom videoconference platform.

Zoom connection (the same meeting is used for both the 1:00 p.m. and 3:00 p.m. depositions):

Join Zoom Meeting:

[REDACTED]

[REDACTED] [REDACTED]

One tap mobile: +1 786 635 1003 (US — Miami); +1 312 626 6799 (US — Chicago); [REDACTED]
[REDACTED]

Join by SIP: [REDACTED]

The attendance of the witness is compelled by a subpoena issued under Florida Rule of Civil Procedure 1.410 and served herewith. The deposition is being taken for purposes of discovery, for use at any hearing or trial in this action, and for all other purposes permitted under the Florida Rules of Civil Procedure.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by email this 24th day of July, 2026, on James W. Kirkconnell, Esq. (jameswk@ufl.edu) and Kimberly LoGiurato, Esq. (klogiurato@ufl.edu), UF Office of General Counsel, counsel for Respondents.

Respectfully submitted,

S\Christopher Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

EXHIBIT E

SUBPOENA FOR DEPOSITION

Professor Jane Bambauer

Fla. R. Civ. P. 1.410. Set for August 3, 2026.

SUBPOENA FOR DEPOSITION (VIA ZOOM VIDEOCONFERENCE)

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT

IN AND FOR ALACHUA COUNTY, FLORIDA

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

v.

Case No.: 01-2026-CA-001794

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

THE STATE OF FLORIDA:

TO: Professor Jane Bambauer, Professor of Law and Brechner Eminent Scholar
University of Florida, Fredric G. Levin College of Law
309 Village Drive, Gainesville, FL 32611

YOU ARE COMMANDED to appear for the taking of your deposition upon oral examination, by remote electronic means (Zoom videoconference), on Monday, August 3, 2026, at 1:00 p.m. (Eastern Time), and continuing from day to day until completed, before an officer authorized by law to administer oaths, to testify in the above-styled action. The deposition will be conducted by remote videoconference pursuant to Florida Rule of Civil Procedure 1.310(b)(4); you may appear by remote videoconference, and the officer is authorized to administer the oath remotely. The Zoom connection details are set forth below.

Zoom connection (the same meeting is used for both the 1:00 p.m. and 3:00 p.m. depositions):

Join Zoom Meeting:



[REDACTED] [REDACTED]
One tap mobile: +1 786 635 1003 (US — Miami); +1 312 626 6799 (US — Chicago); [REDACTED]
[REDACTED]

Join by SIP: [REDACTED]

The subject of the deposition concerns your handling of, and communications relating to, University of Florida public-records request No. W018463-032626, including the records you provided to the University's Director of Public Records in response to the search of that request, as described in the sworn affidavit filed in this action.

WITNESS FEE: Witness fees and mileage as provided by section 92.142, Florida Statutes, are tendered or will be tendered at the time of service as required by law.

NOTICE: This is a subpoena for your appearance at a deposition, issued pursuant to Florida Rule of Civil Procedure 1.410. If you fail to appear in response to this subpoena, you may be held in contempt of court. If you object to this subpoena, or seek to limit or modify it, you must file and serve a written objection or a motion for protective order before the date and time of the scheduled appearance; the Court will resolve any such objection at or before that time. You are subpoenaed to appear by the following self-represented litigant, who is also a member of The Florida Bar, and unless excused from this subpoena by that litigant or by the Court, you shall respond to this subpoena as directed.

AMERICANS WITH DISABILITIES ACT (ADA) NOTICE: If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Court Administration, Eighth Judicial Circuit, before the proceeding.

DATED this 24th day of July, 2026.

s\Christopher Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

Attorney of record issuing this subpoena

(self-represented Petitioner, member of The Florida Bar)

cahanson77@yahoo.com · 727-409-5738

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this subpoena and the accompanying Notice of Taking Deposition was served on Respondents' counsel, James W. Kirkconnell, Esq. (jameswk@ufl.edu) and Kimberly LoGiurato, Esq. (klogiurato@ufl.edu), by email this 24th day of July, 2026, and that the subpoena will be served upon the witness by a person authorized by law to serve process, or as otherwise accepted by counsel.

Christopher A. Hanson, Esq.

EXHIBIT F

PETITIONER'S EMAIL TO RESPONDENTS' COUNSEL

July 13, 2026

Requesting available deposition dates and offering to coordinate scheduling.

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: christophhanson77@gmail.com; universityofflorida@mycusthelp.net; jameswk@ufl.edu

Date: Monday, July 13, 2026 at 01:57 PM EDT

Dear Mr. Kirkconnell:

I am drafting the Reply to the University's Response to the Order to Show Cause. I may need an extra 5–7 days to finish the reply. Do you have any objection to an extension of 7 days?

Additionally, efficiency is my primary objective here. I have encountered enormous, unnecessary obstacles and delays in the courts over the past two years. What I am requesting from UF is simple. I write separately to give the University the opportunity to resolve the core of this case without further judicial time.

1. Demand for production. Mr. Hines has sworn that UFIT "gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty." (Hines Aff. ¶ 6.) The University produced 53 pages — its correspondence directly with me — and nothing else, explaining the difference only as records that "did not meet the definition of public records" or "concerned individuals having the surname Hanson, but with no relation to the Petitioner." (Hines Aff. ¶ 7.)

The University judged my own letters responsive and produced additional copies back to me; and everything I did not already possess, it withheld. On behalf of Petitioners, I ask that the University produce the remainder of the located pages now. If the University maintains that any located page is exempt, is not a public record, or is not responsive, please identify each such page and state the basis with particularity — whichever of those grounds applies — consistent with the burden the University's own cited authority places on the party resisting production. A response within five (5) business days would allow the parties to narrow the issues before the Court takes them up.

To be clear, the correspondence the University returned to me is not what this case is about. The matters requiring attention are the records I do not have — including the case-number and keyword material the University's filings have not yet addressed. Those issues are framed in the enclosed discovery rather than argued in this letter. I am including the contact for the records custodian department due to the additional public records request attached here to

2. Discovery. Served with this letter are Petitioner's First Requests for Admission, First Set of Interrogatories, and First Request to Produce, each directed to the facts the University itself put in issue through the Hines affidavit: what was searched, what was found, what was withheld, and on what stated basis. Given the statutory priority of this action under Section 119.11(1), Florida Statutes, Petitioner requests that the University respond on an expedited basis; if the University believes discovery in this proceeding requires leave of court or a different schedule, please say so promptly and Petitioner will take the question to the Court rather than let it lie.

3. Depositions. Please provide, within seven (7) days, available deposition dates within the next thirty (30) days for each of the following:

(a) **John Hines**, whose affidavit the University has placed at the center of its Response, and who swears he personally "delivered the responsive public records to Petitioner" on May 4, 2026 (Aff. ¶ 8) — a delivery made by an email that, like every University communication concerning the Request, identified no individual by name or title;

(b) **A University designee under Rule 1.310(b)(6)** with knowledge of the handling of Request No. W018463-032626 — including the identity and role of each person who authored, reviewed, or approved the University's communications to me of March 26, April 23, May 4, and May 8, 2026, each sent unsigned from the University's records-portal mailbox notwithstanding my express, repeated requests that the responsible individual be identified; the searches actually run; and the disposition of the gathered pages; and

(c) **Mr. David Cuillier**, whose correspondence with me constitutes the entirety of the University's production and whose records bear directly on the adequacy of the University's search.

Petitioner offers to coordinate scheduling cooperatively; if the parties are unable to coordinate, Petitioner will raise scheduling with the Court at the Section 119.11(1) hearing. If the University contends that any deposition in this proceeding requires leave of court, please say so promptly.

4. Preservation. Demand is renewed that the University preserve, and direct UFIT and all personnel to preserve: the 470+ pages gathered; all UFIT search outputs, hit lists, queries, and logs associated with request W018463-032626; the May 4, 2026 delivery package; and all records concerning the handling of the request — on every system and backup where they reside, with associated metadata, and with any automatic deletion or overwriting suspended.

This correspondence is written to resolve issues, not multiply them. If the University will produce the located records or lodge them with the Court per its own footnoted offer, much of what follows becomes unnecessary. I look forward to your prompt response.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner



PRR 2 TO UF.pdf
99.6



Rogs to UF.pdf
101.1



RFAS to UF.pdf
123



RTP to UF.pdf
122.9

EXHIBIT G

PETITIONER'S EMAIL TO RESPONDENTS' COUNSEL

July 24, 2026

Serving the deposition notices and the Bambauer subpoena.

From: cahanson77@yahoo.com (cahanson77@yahoo.com)
To: hallt@circuit8.org; klogiurato@ufl.edu; jameswk@ufl.edu
Cc: christophhanson77@gmail.com
Date: Friday, July 24, 2026 at 05:00 PM EDT

Mr. Kirkconnell,

Because the University has declined to coordinate deposition dates and the expedited nature of these proceedings, I am sending notices of some of the depositions we've discussed so the schedule is fixed and the parties can bring any dispute before the Court on a defined timeline. Attached are:

1. Notice of Taking Deposition of John Hines (the University's Director of Public Records and affiant) — Monday, August 3, 2026, 3:00 p.m. ET, by Zoom;
2. Notice of Taking Deposition of Professor Jane Bambauer — Monday, August 3, 2026, 1:00 p.m. ET, by Zoom; and
3. A subpoena for the deposition of Professor Bambauer under Rule 1.410.

Both depositions concern a narrow, defined subject: the conduct and results of the search of request No. W018463-032626 — what was searched, what was located, what was produced, withheld etc., and on what basis. Mr. Hines is the University's records custodian and its affiant; his attendance is requested on this Notice, without a subpoena, as a managing agent of the University.

So that the depositions are productive and the parties' time is not wasted, I ask that the University make the records at issue — the located pages and the search artifacts (queries, hit lists, audit logs) for request No. W018463-032626 — available for reference at the depositions, or produce them beforehand. This is the some material sought in my pending discovery and in PRR2, and having it available will allow these depositions to resolve, rather than multiply, the issues before the Court.

To avoid unnecessary cost and process, please let me know

- whether your office will **accept service of the subpoena on Professor Bambauer's behalf**, or whether your position is she must be served personally as a non-party; and
- whether the University will **produce Mr. Hines for his deposition on this Notice** without the need for a subpoena.

If the University intends to move for a protective order as to either deposition, I ask that you file it promptly so the Court can resolve it before August 3, and I remain willing to confer by phone first. I am also willing to discuss the Zoom logistics and the court reporter once those are set. If it is more efficient to take up the deposition schedule at the case management conference now being set, I am glad to do that as well, provided the dates are preserved in the meantime.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

On Thursday, July 16, 2026 at 09:29:44 AM EDT, Kirkconnell,James W <jameswk@ufl.edu> wrote:

Thank you, Ms. Hall.

Jim Kirkconnell
Assistant Counsel
UF Office of General Counsel
(352) 392-1358

From: Theresa Hall <hallt@circuit8.org>
Sent: Thursday, July 16, 2026 7:23 AM
To: Kirkconnell,James W <jameswk@ufl.edu>; cahanson77@yahoo.com; LoGiurato,Kimberly <klogiurato@ufl.edu>
Cc: christophhanson77@gmail.com
Subject: Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

[External Email]

I have this on the calendar and I will present an order to Judge Keim to set the case management conference.

Thank you and have a great day.
Theresa J. Hall, Judicial Assistant to
Honorable Donna M. Keim
Family and Civil Justice Center
201 E University Avenue, Room 416
Gainesville, Florida 32601
(352) 374-3646

Gilchrist County Courthouse
112 South Main Street Trenton, FL 32693-3200
(352) 374-3646

Union County Courthouse
55 West Main Street Lake Butler, Florida 32054-1600
(352) 374-3646

Divisional Instructions for Div. CA1 <https://circuit8.org/wp-content/uploads/Alachua-County-Circuit-Civil-Division-J-Civil-Policies-and-Procedures.pdf>

PLEASE BE ADVISED THAT THE CLERK OF COURT OFTEN DOES NOT DOCKET PLEADINGS UNTIL 3-8 DAYS AFTER THEY ARE FILED. PLEASE INCLUDE A COPY OF ANY RELEVANT PLEADINGS WHEN YOU EMAIL THE COURT TO REQUEST A HEARING OR ENTRY OF AN ORDER.

Please be advised that Canon 3(B)(7) of the Code of Judicial Conduct prohibits a judge from considering ex parte communications or other communications made to a judge outside the presence of the parties concerning a pending or impending matter.

From: Kirkconnell,James W <jameswk@ufl.edu>
Sent: Wednesday, July 15, 2026 4:07 PM
To: Theresa Hall <hallt@circuit8.org>; cahanson77@yahoo.com <cahanson77@yahoo.com>; LoGiurato,Kimberly <klogiurato@ufl.edu>
Cc: christophhanson77@gmail.com <christophhanson77@gmail.com>
Subject: RE: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Hi Ms. Hall,

I am available for any of those times. Please let me know which slot the Court prefers, and our office can file a notice of hearing.

Thanks,

Jim

Jim Kirkconnell
Assistant Counsel
UF Office of General Counsel
(352) 392-1358

From: Theresa Hall <hallt@circuit8.org>
Sent: Wednesday, July 15, 2026 11:52 AM
To: cahanson77@yahoo.com; LoGiurato, Kimberly <klogiurato@ufl.edu>
Cc: Kirkconnell, James W <jameswk@ufl.edu>; christophhanson77@gmail.com
Subject: RE: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

[External Email]

If Mr. Kirkconnell is available I will set a case management conference for 30 minutes on any of the dates he is available as long as it is still open.

Thank you and have a great day.
Theresa J. Hall, Judicial Assistant to
Honorable Donna M. Keim
Family and Civil Justice Center
201 E University Avenue, Room 416
Gainesville, Florida 32601
(352) 374-3646

Gilchrist County Courthouse
112 South Main Street
Trenton, FL 32693-3200
(352) 374-3646

Union County Courthouse
55 West Main Street
Lake Butler, Florida 32054-1600
(352) 374-3646

Divisional Instructions for Div. CA1 <https://circuit8.org/wp-content/uploads/Alachua-County-Circuit-Civil-Division-J-Civil-Policies-and-Procedures.pdf>

PLEASE BE ADVISED THAT THE CLERK OF COURT OFTEN DOES NOT DOCKET PLEADINGS UNTIL 3-8 DAYS AFTER THEY ARE FILED. PLEASE INCLUDE A COPY OF ANY RELEVANT PLEADINGS WHEN YOU EMAIL THE COURT TO REQUEST A HEARING OR ENTRY OF AN ORDER.

Please be advised that Canon 3(B)(7) of the Code of Judicial Conduct prohibits a judge from considering ex parte communications or other communications made to a judge outside the presence of the parties concerning a pending or impending matter.

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Wednesday, July 15, 2026 11:40 AM
To: LoGiurato, Kimberly <klogiurato@ufl.edu>; Theresa Hall <hallt@circuit8.org>
Cc: Kirkconnell, James W <jameswk@ufl.edu>; christophhanson77@gmail.com
Subject: Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Hi Ms. Hall. How long and for what type of hearing are these blocks for?

The only thing that we may need now is a case management conference - probably 30 minutes and preferably by zoom if acceptable to Judge Keim.

I'm hoping to hear back from Mr. Kirkconnell on what we can agree on.

If these slots are for the 30 minute case management conference, I will make any of the 3 work and would request that we get that on the calendar now so we don't lose the dates. If we resolve all of the outstanding disputes and procedures, we can cancel immediately.

Please let me know if you need anything else from me. Thank you for your prompt attention on this.

Chris Hanson
FL Bar #44094
727-409-5738

On Wednesday, July 15, 2026 at 11:11:18 AM EDT, Theresa Hall <hallt@circuit8.org> wrote:

Good morning:

Are the parties requesting a hearing at this time or are you working on the issues without court intervention? If you are requesting a hearing my first available times are as follows:

8/24 at 11:00
8/24 at 1:30
8/26 at 2:15

Thank you and have a great day.
Theresa J. Hall, Judicial Assistant to
Honorable Donna M. Keim
Family and Civil Justice Center
201 E University Avenue, Room 416
Gainesville, Florida 32601
(352) 374-3646

Gilchrist County Courthouse
112 South Main Street Trenton, FL 32693-3200
(352) 374-3646

Union County Courthouse
55 West Main Street Lake Butler, Florida 32054-1600
(352) 374-3646

Divisional Instructions for Div. CA1 <https://circuit8.org/wp-content/uploads/Alachua-County-Circuit-Civil-Division-J-Civil-Policies-and-Procedures.pdf>

PLEASE BE ADVISED THAT THE CLERK OF COURT OFTEN DOES NOT DOCKET PLEADINGS UNTIL 3-8 DAYS AFTER THEY ARE FILED. PLEASE INCLUDE A COPY OF ANY RELEVANT PLEADINGS WHEN YOU EMAIL THE COURT TO REQUEST A HEARING OR ENTRY OF AN ORDER.

Please be advised that Canon 3(B)(7) of the Code of Judicial Conduct prohibits a judge from considering ex parte communications or other communications made to a judge outside the presence of the parties concerning a pending or impending matter.

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Tuesday, July 14, 2026 1:36 PM

To: Theresa Hall <hallt@circuit8.org>; LoGiurato, Kimberly <klogiurato@ufl.edu>

Cc: Kirkconnell, James W <jameswk@ufl.edu>

Subject: Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Good afternoon, the court's order allowed for the attached pleading in response to respondents, July 7th, 2026 filing. Both of the documents were filed timely. My reply references some discovery matters necessary before a final evidentiary hearing would be productive. I agree that production of the 470 plus documents is necessary at this time; but see no basis for it occurring "in camera." An in camera inspection would be proper to evaluate any exemptions at issue, but no exemption is pled. There is a conclusory request for an in camera inspection with no basis to support it. The procedure is simple production.

Mr. Kirkconnell - perhaps you can and I can discuss by phone or email what we can resolve ourselves and what requires a hearing? I'm hoping this can go as efficiently as possible for all involved.

I can be available this afternoon or tomorrow for a call or please send me an email with what issues I raise in the attached reply we can resolve amicably, if you prefer communicating in email. Thank you for your cooperation.

Chris Hanson
FL bar #44094
727-409-5738

On Tuesday, July 14, 2026 at 08:51:46 AM EDT, LoGiurato, Kimberly <klogiurato@ufl.edu> wrote:

Good morning, Ms. Hall

Please let us know if the Court would like the parties to schedule a hearing on this matter pursuant to FS s. 119.11(1) and/or an *in camera* review of the documents in question.

Thank you,



Kimberly LoGiurato
Legal Assistant II
Office of the Vice President and General Counsel
University of Florida
klogiurato@ufl.edu
352-294-1909

CONFIDENTIAL INFORMATION: The information contained in this electronic message and any attachments to it are intended for the exclusive use of all addressees and may contain confidential attorney-client communication and/or other confidential information. If you are not the intended recipient, please destroy all copies of this message and attachments and immediately notify this office by sending a reply e-mail to the sender. Thank you.



Notice_Deposition_Bambauer_2026-08-03.pdf
100.6



Notice_Deposition_Hines_2026-08-03.pdf
99.8



Subpoena_Deposition_Bambauer_2026-08-03.pdf
100.2

EXHIBIT H

PETITIONER'S EMAIL TO RESPONDENTS' COUNSEL

August 25, 2026

Regarding witnesses for the September 2, 2026 hearing.

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: jameswk@ufl.edu

Bcc: christophhanson77@gmail.com

Date: Tuesday, August 25, 2026 at 01:55 PM EDT

Good afternoon Mr. Kirkconnell, I just received this from the court, setting the final hearing. Please be advised that I will require live testimony from various individuals associated with the University of Florida. The individuals from whom I will require live testimony including from the records custodian, Mr. Hines. Professor David Cuillier, Professor Jane Bambauer, and Amy Quillien from the General Counsel's office.

I've had difficulty with serving Professor Cuillier before. Given his and Ms. Bambauer's career commitment to public interest specifically in relation to government transparency and First Amendment rights, perhaps they will agree to informal service thru your office. If not, I will have them served formally.

I believe the records custodian has an obligation to attend without formal service. If you disagree, please let me know ASAP.

Also, as long as you and Ms. Quillian are in the same office, informal service makes a lot more sense. Thank you for your cooperation and I look forward to hearing from you.

Chris Hanson
727-409-5738

----- Forwarded Message -----

From: "eservice@myflcourtagency.com" <eservice@myflcourtagency.com>

Sent: Tuesday, August 25, 2026 at 01:39:07 PM EDT

Subject: SERVICE OF COURT DOCUMENT CASE NUMBER 012026CA001794XXXXXX CHRISTOPHER A HANSON, et al. v. UNIVERSITY OF FLORIDA BOARD OF TRUSTEES, et al.

Notice of Service of Court Documents

Filing Information

Filing #:

255637757

Filing Time:

08/25/2026 01:39:03 PM ET

Filer:

Judge Viewer 999-999-9999

Court:

Eighth Judicial Circuit in and for Alachua County, Florida

Case #:

012026CA001794XXXXXX

Court Case #:

012026CA001794XXXXXX

Case Style:

CHRISTOPHER A HANSON, et al. v. UNIVERSITY OF FLORIDA BOARD OF TRUSTEES, et al.

Documents

**Click on the file name below to download or print your document NOW.
The link expires in 14 days**

Documents

Title	File
Judicial Orders Order Setting Hearing	ordernc5lyN-pdfa.pdf

E-service recipients selected for service:

Name	Email Address
CHRISTOPHER A HANSON, ESQ	cahanson77@yahoo.com
	truthoverchaos@outlook.com
	christophhanson77@gmail.com
JAMES W KIRKCONNELL, ESQ	jameswk@ufl.edu
	klogiurato@ufl.edu
Chris Hanson	cahanson77@yahoo.com

E-service recipients not selected for service:

Name	Email Address
No Matching Entries	

This is an automatic email message generated by the Florida Courts E-Filing Portal. This email address does not receive email.

Document Access Link(s) will be active for 14 days (excluding weekends) after the Clerk accepts the submission or it is abandoned. In addition to access to the link for 14 days (excluding weekends), the documents will also be available, after acceptance by the Clerk, to counsel of record in the portal on the My Cases page, by clicking on the case number and then the document name, or by accessing the Clerk's website.

If you are not associated with this case and wish to be removed, please click [here](#) to request to be removed from the E-service list.

Thank you,
The Florida Courts E-Filing Portal

EXHIBIT I

RESPONDENTS' COUNSEL'S REPLY

August 26, 2026

Reply of James W. Kirkconnell, Esq.



Chris Hanson <christophhanson77@gmail.com>

RE: UF's outstanding ministerial duties...

Kirkconnell, James W <jameswk@ufl.edu>
 To: Chris Hanson <christophhanson77@gmail.com>
 Cc: "LoGiurato, Kimberly" <klogiurato@ufl.edu>

Wed, Aug 26, 2026 at 2:26 PM

Hi Mr. Hanson,

To the extent that your correspondence seeks public records, please clarify which records you seek using the University's public records portal ([UF Public Records Center](#)).

The University does not agree to a continuance of the September 2, 2026, evidentiary hearing in Alachua County Case No. 01-2026-CA-001794 (the "Hearing"). The University will present the testimony of its Records Custodian, John Hines, at the Hearing. The University does not agree to accept service of process for any other witness for the Hearing.

Thank you,

Jim Kirkconnell

Assistant Counsel

UF Office of General Counsel

(352) 392-1358

From: Chris Hanson <christophhanson77@gmail.com>
Sent: Wednesday, August 26, 2026 10:37 AM
To: Quillen, Amy <abquillen@ufl.edu>; Kirkconnell, James W <jameswk@ufl.edu>; Cuillier, David <cuillierd@ufl.edu>; Bambauer, Jane <janebambauer@law.ufl.edu>
Cc: LoGiurato, Kimberly <klogiurato@ufl.edu>; @ UR Public Record Requests <pr-request@ufl.edu>; cahanson77@yahoo.com; University of Florida News <news@ufl.edu>; Roldan Hernandez, Cynthia <croidan@ufl.edu>; Hernández, Saúl <hernandez.sa1@ufl.edu>; UF-Compliance <UF-Compliance@ufl.edu>; Harris Casanova, Cionne <charriscasanova@ufl.edu>; chris@truthoverchaos.com
Subject: UF's outstanding ministerial duties on public records requests W018463-032626, W018964-060526, and W019186-071326; documents identified in UF searches never identified for Petitioner; ethical obligations arising on these facts; a request for comment; a...

[External Email]

First - to the University's media and compliance contacts: This involves public records litigation against UF. The individuals to whom it's addressed below all have direct involvement in the facts presented here.

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I include the University's Office of Strategic Communications and Marketing and the University's Compliance and Ethics for two reasons.

1) The facts of the present case demonstrate the Brechner Institute seem to be working precisely against what their mission purports to be, and

2) the request for comment in this section specifically asks for the University's public position on these issues.

There is more information available regarding the conduct of UF staff on X/twitter at @truthoverchaos and a substack with the same handle. I would be happy to provide any additional information if the University reps just now included have questions.

Ms. Quillen, Mr. Kirkconnell, Dr. Cuillier, and Professor Bambauer:

You each should already be aware I've tried for over two years now to get a simple discovery result that the unrefuted facts and law require. The corruption and lack of accountability that I've encountered are unconscionable. My life for the past 2.5 years perfectly illustrates the importance of Brechner's mission. The bad faith in responding to public records requests is perhaps the greatest causal factor to the damage this has done to my young and innocent children. I hope that you will begin to take these facts and your ethical responsibilities seriously now. This is not getting better for UF with time. My goal is still not to cause embarrassment. Please review this carefully and comply with UF's ministerial duties described herein.

Attachment A is part of this demand and is incorporated by reference. It provides the details on the specific materials and coverage periods in my UF requests to date. Everything requested below is applicable to each of the separate requests in Attachment A. Attachment B is also incorporated by reference. It is a one-page table of the batches of records the University's own documents show it identified, and what its records show became of each.

Each numbered Demand below states a ministerial duty and the compliance owed on it. Each numbered Question can be answered in one sentence. I will treat any question left unanswered as the University's answer to it.

1. THE REQUESTS, AND THE DATE COMPLIANCE IS MEASURED AGAINST

W018463-032626, submitted March 26, 2026, is a request under Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution for University records from December 1, 2024 forward in three categories: my own name and contact information; six enumerated case numbers from my litigation; and a list of named keywords, individuals, and subjects. On May 4, 2026 the University produced 53 pages of my own prior correspondence with University faculty. Nothing further has been produced.

W018964-060526 sought the workflow and processing records for W018463-032626. The University produced records on it on July 17, 2026. Those records are the source for most of what follows. I call them "the July 17 production" below.

W019186-071326, transmitted July 13, 2026 through Mr. Kirkconnell, sought the search and processing records for W018463-032626. It was acknowledged the same day. No substantive response has ever been received.

I filed a mandamus petition on June 4, 2026. The Court issued an Order to Show Cause on June 12, and it was served on the University on June 17, 2026.

On July 30, 2026, the University filed 479 pages of gathered records as Exhibit D to its Motion for Protective Order. That filing is the University's first accounting of what it purportedly gathered on W018463-032626. And it was made to the docket rather than to me.

W018463-032626 explicitly sought records between December 1, 2024, and "the date this request is fulfilled," and no response the University has ever sent stated any different scope. Whatever else is disputed, July 30, 2026 is the University's own accounting date, and its compliance obligations run at least through it.

2. MINISTERIAL DOCUMENT PRODUCTION STILL OWED BY THE UNIVERSITY

Chapter 119 states these duties in mandatory terms. Section 119.07(1)(a) provides that the custodian "shall permit the record to be inspected and copied by any person desiring to do so, at any reasonable time, under reasonable conditions, and under supervision by the custodian of the public records." Section 119.07(1)(c) requires the custodian to "acknowledge requests to inspect or copy records promptly and respond to such requests in good faith," and states that "A good faith response includes making reasonable efforts to determine from other officers or employees within the agency whether such a record exists and, if so, the location at which the record can be accessed." Section 119.07(1)(d) provides that a custodian asserting a partial exemption "shall redact that portion of the record to which an exemption has

been asserted and validly applies, and such person shall produce the remainder of such record for inspection and copying."

Each of the following remains unperformed.

The remainder was never produced. Of the 479 pages the University reports gathering, 53 were initially produced and only after an extended "legal review" process. Yet, the documents provided were my own correspondence. No redacted version of any other gathered page has ever been produced, and no exemption was cited to me when the withholding happened. Section 119.07(1)(d) does not permit an agency to withhold whole pages because parts may be exempt. It commands redaction and production of the remainder. It certainly requires identification of the materials located.

What UF did is unclear from the records I have. What is clear is that constitutional access to public records is only illusory in the manner UF handled this. If the public institution can simply produce what it wants and never identify what it doesn't want the public to see, it enables government actors in misleading the public while robbing citizens of their constitutional right to inspect government documents. This is already clear from the production to date. What motivated these violations is still unclear and UF's continuing noncompliance is a critical part of dishonest and tyrannical overreach active in Florida's judiciary at the expense of my family.

DEMAND 1. Produce the remainder of every gathered page, redacted only to the extent an exemption has been asserted and validly applies.

The search period was silently cut off, and compliance through July 30, 2026 is owed. The University's own search strategy log shows UFIT was instructed to run a date range of December 1, 2024 to March 26, 2026, the day the request was filed. No response ever disclosed that limitation or stated any objection to the scope I requested. I learned of the cutoff from the University's records about itself, months later. No record created after March 26, 2026 has ever been within the scope of any search the University has run, and that period is when the University considered this request internally, decided what to withhold, prepared and shelved the extraction described in section 3, and filed 479 pages in open court.

DEMAND 2. Search for and produce the records responsive to W018463-032626 for the full period through July 30, 2026, and comply with W018964-060526 and W019186-071326 through the same date. If the University refuses as to any request, state the basis in writing.

W019186-071326 has never been answered. It was transmitted and acknowledged on July 13, 2026. Mr. Kirkconnell wrote on July 14 that it had been "forwarded to Mr. Hines and will be processed in due course." No estimate, no production, and no substantive response of any kind has followed.

DEMAND 3. Respond substantively to W019186-071326 now.

The University located records and never said so. The July 17 production shows University staff locating records in five separate batches, recording drive paths and file names for several of them. None of that was communicated to me under section 119.07(1)(c), which makes the existence and location of responsive records part of a good faith response. And from what I have, it's obvious that there are responsive materials.

3. THE UNIVERSITY'S INCONSISTENT EXEMPTION POSITIONS, AND THE DOCUMENTS ITS OWN SEARCHES IDENTIFIED THAT IT HAS NEVER IDENTIFIED FOR ME

The University has taken two irreconcilable positions on exemptions. On May 5, 2026 it wrote to me through its records portal: "No exempt information was withheld or redacted from the records responsive to your request, and consequently, no statutory exemptions were cited in UF's response." Footnote 4 of its July 30, 2026 motion states that a category of pages was redacted pursuant to 20 U.S.C. § 1232g, § 1006.52, Florida Statutes, and § 119.071(5)(b), Florida Statutes. Both statements cannot be accurate.

QUESTION 1. What information was redacted under each of those three provisions, on what date was each redaction made, and how is that consistent with the May 5 statement that no exemptions were cited?

The statute commands identification. Section 119.07(1)(e) requires a custodian contending that a record is exempt to "state the basis of the exemption that he or she contends is applicable to the record, including the statutory citation to an exemption created or afforded by statute." Section 119.07(1)(f) provides: "If requested by the person seeking to inspect or copy the record, the custodian of public records shall state in writing and with particularity the reasons for the conclusion that the record is exempt or confidential." This letter reiterates that ongoing request for all documents, as to every record the University has withheld, redacted, or declined to produce on any of the three requests. To the extent any prior correspondence or filing of mine used the shorthand "privilege log," that phrase referred to precisely this: the statutory identification that sections 119.07(1)(e) and (1)(f) command on their own terms, being the reason, the citation, and enough identification of the withheld record that the claim can be reviewed. Nothing beyond the statute's own text is

asked. A statement of reasons that does not identify the material it applies to is not particular, and cannot be reviewed by the Court that will have to pass on it. This correspondence serves as another request for explanation on reason, rule, and enough for identification of all materials identified in the search and compile process and withheld for any and all reason(s).

QUESTION 2. For every record the University has withheld, redacted, or declined to produce, state in writing and with particularity the reason, the statutory citation, and enough identification of the record that the claim can be reviewed.

A position that a record is not a public record must also be identifiable. The Legislature anticipated that assertion. Section 119.07(1)(h) provides that "Even if an assertion is made by the custodian of public records that a requested record is not a public record subject to public inspection or copying under this subsection, the requested record shall, nevertheless, not be disposed of for a period of 30 days after the date on which a written request to inspect or copy the record was served on or otherwise made to the custodian of public records by the person seeking access to the record," and section 119.11(4) applies the preservation duty in a pending enforcement action "notwithstanding the applicability of an exemption or the assertion that the requested record is not a public record subject to inspection and examination under s. 119.07(1)." An assertion that does not say what it covers leaves nothing for me, or the Court, to examine.

QUESTION 3. Identify every record or category of records the University contends is not a public record, and state the basis for that contention.

DOCUMENTS IDENTIFIED IN THE UF SEARCHES THAT REMAIN UNIDENTIFIED

The July 17 production shows University staff locating and transmitting records in five separate batches between March 30 and May 7, 2026. It does not show what became of them. Attachment B sets out the five batches in table form, with the dates, page counts, file names, and drive locations exactly as they appear in the University's own records. The summary below is brief. The table controls the detail.

The first batch, four days after the request. On March 30, 2026 at 11:29 AM, Mr. Hines asked UFIT to run the request: "Can you please handle the email search for this request? The person did not ask for attachments." Eighty minutes later UFIT reported: "This search concluded with 103 message(s), which resulted in 330 page(s). No attachments were included." The same afternoon Ms. Wood recorded the batch, by file name, on the University drive, for review by the General Counsel. Nothing identifies which of those pages were produced, which were withheld, or on what basis, and no invoice or fee estimate was ever sent to me.

QUESTION 4. Which of the 330 pages in ISS-444193-W018463-032626-103-330-opt.pdf were produced to me, and which were withheld?

The ten pages. Ms. Wood's total of 340 counts ten pages beyond UFIT's 330. Her sentence introducing them reads, in the University's own record, "In addition to the 10 pages from," and stops there. Those ten pages are not identified anywhere in the July 17 production.

QUESTION 5. What are the ten pages that brought the total to 340, where did they come from, and where are they now?

The April 24 batch. On May 7, 2026, Ms. Wood referred in passing to "the 621 pages received from UFIT on 04/24/26." That is the only mention of this batch I have found. No transmittal, no file name, no drive location, and no disposition of any kind appears anywhere.

QUESTION 6. What became of the 621 pages UFIT delivered on April 24, 2026, and where are they now?

The May 4 rerun, and the seventeen recovered messages. On May 4, 2026 UFIT delivered a 109-page rerun, and its engineer reported: "When locating this message, the tool also identified 17 other messages that matched the criteria and should have been included previously. I have included those in PDF format as well." The 53 pages produced to me that same day were my own correspondence.

QUESTION 7. Were any of the 109 rerun pages, or any of the 17 messages UFIT reported it had previously missed, produced to me? If not, on what basis was each withheld?

The May 7 extraction, prepared on the General Counsel's own instruction and never produced. On May 7, 2026 at 9:16 AM, Ms. Quillen asked UFIT to "pull out the results with the search terms 13th Circuit, 2025-CA-002469, 25-CA-10255, Judge Kelly Ayers, Judge Matthew Felix, and surveillance video" and to provide them "as a separate pdf." The 88-page result was received and named the same morning, for review by the General Counsel. It has not been produced to me.

QUESTION 8. Why was ISS-444193-W018463-032626-16-88-opt-SpecificKeywords.pdf never produced, and where is it now?

The counts do not reconcile. As the University's own staff described them, the five batches are 330 pages, 10 pages, 621 pages, 109 pages, and 88 pages, totaling 1,158. Some may overlap: the May 4 delivery is described as a "rerun" and the May 7 delivery is an extraction from earlier results. Only the University can say how much, because only the University has the batches.

Mr. Hines's affidavit swears that UFIT "gathered over 470 pages," Mr. Kirkconnell confirmed 478 on our July 15 call, and paragraph 24 of the July 30 motion reports 479 pages gathered. The April 24 batch alone, at 621 pages, is larger than all three of those figures.

QUESTION 9. Which of these five batches are counted in the 479 pages reported in paragraph 24 of the July 30 motion, and which are excluded from that figure?

4. SOME OF THE PROFESSIONAL RESPONSIBILITY OBLIGATIONS ARISING ON THESE FACTS

Candor to the tribunal. The May 5 portal statement and footnote 4 of the July 30 motion cannot both be accurate. One of them misstates the University's exemption position, either to me on the statutory channel or to the Court in a filing. Rule 4-3.3 of the Rules Regulating The Florida Bar places the obligation to correct a false statement of material fact with the tribunal on the lawyer who made it. I request that UF address that immediately.

Counsel's involvement from the moment of receipt. The request was submitted March 26, 2026. The first action the University's own records show is Mr. Hines's March 30 search instruction to UFIT, and it already carried the Office of the Vice President and General Counsel on it: Ms. Quillen, Associate Counsel, and Ms. Wood, Legal Assistant II in that office, were copied. Every batch UFIT delivered was then routed, in Ms. Wood's own words, "to be reviewed by the General Counsel and for approval to be released." On April 22 and 23 the University told me only that the request was "undergoing legal review." A routine public records request was in the hands of the University's lawyers from its first recorded step, and what those lawyers approved for release was 53 pages of my own correspondence.

QUESTION 10. What communications, meetings, or calendar entries concerning W018463-032626 occurred between March 26 and March 30, 2026, and who participated?

QUESTION 11. Is it the University's standard procedure for the records custodian to route a public records request to the Office of the Vice President and General Counsel for review and release approval? If so, identify the written policy. If not, who directed it here, and when?

Rule 4-3.4(a) provides that a lawyer must not "unlawfully obstruct another party's access to evidence or otherwise unlawfully alter, destroy, or conceal a document or other material that the lawyer knows or reasonably should know is relevant to a pending or a reasonably foreseeable proceeding; nor counsel or assist another person to do any such act."

Preservation.

I demanded preservation of these records on July 13, July 15, July 16, and July 18, 2026, by email to Mr. Kirkconnell as counsel of record, copying Ms. LoGiurato. Beginning July 16 I also asked for written confirmation that preservation was in place. The July 18 demand named the ISS-444193 ticket, both Dropbox transfer folders, four folder paths on the University drive, and the April 24 batch, and asked the University to confirm the Dropbox contents had been preserved outside that platform, because Dropbox links are ephemeral. No response from the University has ever addressed preservation. One email closes that.

Section 119.11(4), Florida Statutes, provides:

"Upon service of a complaint, counterclaim, or cross-claim in a civil action brought to enforce the provisions of this chapter, the custodian of the public record that is the subject matter of such civil action shall not transfer custody, alter, destroy, or otherwise dispose of the public record sought to be inspected and examined, notwithstanding the applicability of an exemption or the assertion that the requested record is not a public record subject to inspection and examination under s. 119.07(1), until the court directs otherwise."

That duty attached on June 17, 2026, when this action was served. It reaches transfers of custody, not only destruction, and it is a standalone statutory duty that operates independently of any discovery ruling. The same obligation arises independently as to the search and processing records: they are evidence in a pending action, they are themselves the subject of W018964-060526 and W019186-071326, and the Court has now set this matter for hearing.

DEMAND 4. Confirm in writing that every item on Attachment A is preserved and that any automatic deletion, retention expiration, overwriting, archiving, or device reassignment that would reach it has been suspended. Preserving a record waives no privilege and requires no one to disclose its contents.

DEMAND 5. As to any statement to the tribunal that is inaccurate, correct the record with the Court and confirm to Page 14 of 36

writing that it has been done.

5. THE JOSEPH L. BRECHNER FREEDOM OF INFORMATION PROJECT, AND A REQUEST FOR COMMENT

This section is addressed to Dr. Cuillier and Professor Bambauer.

The Project's published description of its own work states that it "envision[s] a nation where journalists and citizens can acquire the civic information they need to better their lives, demand accountable government, create a just society, and protect democracy and the republic." Under the heading "What We Do," the site lists educating the public about open government, research on freedom of information issues, and this: "Respond to media requests for comments about pressing FOI issues, including public records denials and policies that unnecessarily hide information from the public." The same page's contact section states: "He welcomes inquiries from journalists seeking comments for stories about public records denials or policies introducing unnecessary secrecy in government."

On March 12, 2026, I brought the Project a public records denial. I am a member of the Florida Bar writing about a records denial I had documented as it happened. The answer I received was: "Sorry to bum you out. As I said, it's not our mission to connect people to journalists – it's just not what we do (nor do we do public statements, amici, etc.)." I asked directly whether any rule or ethical obligation prevented the Project from responding. I was told none did.

There is a further matter I raise because it concerns a University record based on my efforts at Web archive searches. If I'm mistaken on any of this, please let me know. On March 9, 2026, the Project's site stated that it does not provide legal advice but can provide insights, quotes for news stories, and referrals. By April 15, 2026, the same paragraph stated that the Project does not provide legal advice, litigate cases, or connect the public to journalists. The Internet Archive holds no capture between those two dates, so I cannot say when the change was made, who made it, or why, and the interval includes days before I first contacted the Project. The revision history of that page is a University record.

QUESTION 12. On what date was that paragraph revised, by whom, and at whose request?

This letter is a request for comment, of the kind the Project's own published description says it answers.

QUESTION 13. Is a state university's withholding of records it located within eighty minutes of being asked, followed by the production of 53 pages of the requester's own correspondence, consistent with the principles the Project publishes and teaches? If the Project's position is that it will not comment, I ask that it say so in writing.

6. WHAT I AM REQUESTING NOW

(a) Comply with Demands 1 through 5.

(b) Answer Questions 1 through 13, in writing.

(c) As to any item on Attachment A that does not exist, or that is already covered by a hold the University has in place, say so. A group-level statement is enough.

(d) As to any item on Attachment A that has been deleted, altered, moved, overwritten, transferred out of the University's custody, or become unavailable at any time since March 26, 2026, identify it.

Please respond by Friday, August 28, 2026 at the latest. Also I think a brief continuance from the September 2, 2026 hearing date is necessary. Please let me know if you agree on that. On a separate note I have some serious concerns about Judge Keim's ability to provide a fair process. She has placed me in a real time crunch here by denying all discovery and setting the hearing for a week out. Judge Keim was well aware of my plan to pursue motions on her announced orders at the 8-24-26 hearing. It seems incredibly inappropriate to set the final hearing well within the window that I would have to file my motion to disqualify and even motion for rehearing.

I am working on many cases right now, all with the same common genesis relevant here. I need to do some research and drafting the motion to disqualify is certainly going to be time-consuming. I don't know how much in advance of the September 2nd hearing date I'll be able to complete that.

I am also waiting on a response to whether UF will agree to produce Records custodian Hines, Dr. Cuillier, Professor Bambauer, and Attorney Quillen for the hearing currently set for September 2, 2026.

Respectfully,

Christopher A. Hanson
Florida Bar No. 44094
Self-Represented Petitioner

8/30/26, 10:44 AM

Gmail - RE: UF's outstanding ministerial duties...

[REDACTED]
cahanson77@yahoo.com, 727-409-5738

EXHIBIT M

Petitioner's July 16, 2026 email to Respondents' counsel memorializing the July 15, 2026 call, including the confirmation that UFIT located 478 pages.



Chris Hanson <christophhanson77@gmail.com>

Memorializing Call / Discovery Objections and Upcoming Timelines - Hanson v. UF, No. 01-2026-CA-001794

cahanson77@yahoo.com <cahanson77@yahoo.com>

Thu, Jul 16, 2026 at 2:31 PM

To: "Kirkconnell, James W" <jameswk@ufl.edu>

Cc: "LoGiurato, Kimberly" <klogiurato@ufl.edu>, chris hanson <christophhanson77@gmail.com>

Mr. Kirkconnell,

I write to memorialize our telephone conversation yesterday and to set out, in one place, where the production, preservation, and discovery issues stand following that call. If your recollection of any of the points below differs from mine, please tell me promptly in writing.

The "personal records" question, production, and in camera review. On our call, you indicated that the University may treat some of the located records as "personal" in nature and outside public-records consideration. I want to be clear about my position on that. I'm requesting all records identified including any that may appear personal – to be identified and produced. Florida law begins from a constitutional presumption of access to public records (Art. I, § 24, Fla. Const.; § 119.01, Fla. Stat.). Whether any particular located page falls outside Chapter 119 as genuinely personal is a question ultimately decided by the Court.

If the University intends to withhold any page(s) of the documents identified in relation to my request, from Court consideration, please let me and the Court know so that we can have a formal determination on that.

The University's sworn affidavit does not describe any located record as "personal": it states only that "some records did not meet the definition of public records," and that others "concerned individuals having the surname Hanson, but with no relation to the Petitioner" (Hines Aff. ¶17). I assume those are the "personal" records you mentioned yesterday?

Whatever ground the University relies on, it should be stated page by page. Accordingly, I ask that the University either (i) the full set of located pages, or (ii) provide a page-by-page log stating the basis for withholding each page.

During our call, you also confirmed that UFIT located 478 pages in its search. I want the record clear on that figure, because Mr. Hines's affidavit disclosed only the approximation that UFIT "gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty" (Hines Aff. ¶16), rather than the exact count. The University produced 53 pages — my own correspondence with UF faculty, which I already had — leaving 425 located pages that have not been produced. I intend to develop the basis for that cull, and for the search itself, through my pending workflow records request (PRR2, Ref. W019186-071326), which seeks the search queries, hit lists, audit logs, system metadata, and the complete portal/GovQA trail for the W018463-032626 search, including all attachments.

Given the delays in this process, and the University's evolving explanations — the unexplained legal process delay, no information at first production about the records the University withheld, and only piecemeal detail since — I would appreciate some clarification about the 478 figure and how the located pages break down.

This should not have to wait for the more recent requests to work their way through. So that the parties can narrow these issues before involving the Court, please address the following:

1. Is 478 the total number of pages the search identified — including both the pages the University considers public records and those it considers non-public?
2. Please state that total as its two subsets — pages identified as public records, and pages identified as non-public — and, within each subset, how many were withheld as records that "concerned individuals having the surname Hanson, but with no relation to" me.

3. Please provide that same public / non-public breakdown as it stood at the time of the May 4, 2026 production of the 53 pages.
4. Please also provide the breakdown as it stood at each later point the University's categorization may have changed — including when my follow-up correspondence was received, and when the University prepared its Response to the writ — so the record reflects how the numbers stood at each stage.

The search queries, hit lists, and audit logs I have requested in PRR2 should independently establish these counts although again this should have been produced long ago.

Discovery and the University's stated intention. You stated that the University intends to file a Motion for Protective Order to block at least some of the discovery I served or requested on July 13. Before the University files that motion, I ask that you state in writing, item by item, which discovery the University objects to and which it will provide. For clarity, the July 13 discovery consists of the following:

Written discovery served July 13, 2026:

1. Petitioner's First Requests for Admission;
2. Petitioner's First Set of Interrogatories;
3. Petitioner's First Request to Produce.

Depositions for which I requested available dates (within seven days) on July 13, 2026:

4. John Hines, the University's sole affiant;
5. A Rule 1.310(b)(6) University designee with knowledge of the search and the records-portal communications;
6. Dr. David Cuillier, whose correspondence with me comprises the bulk of the University's production and who is a central fact witness on the adequacy of the search.

These depositions go to the adequacy and conduct of the University's search — what was searched, what was located, and on what basis records were or were not produced. Please state the University's position on each of the six items above before the University files any protective-order motion, and in any event by Monday, July 20. If the University contends any item requires leave of court, please state the legal basis. As to Dr. Cuillier, please also advise whether your office will accept service of a deposition subpoena on his behalf, or whether he must be served as a non-party.

Open timelines. For the avoidance of doubt:

- Monday, July 20: the five business days I requested for the University either to produce the remaining 425 located pages, or to provide a particularized log identifying each page not produced and the specific basis for it. A conclusory assertion that records "did not meet the definition of public records," or concern other individuals with the surname "Hanson" (Hines Aff. ¶17), does not satisfy the burden the University's own cited authority places on the party resisting production. If no log is provided, I will ask Judge Keim for an in camera inspection.
- Wednesday, July 22: please provide an estimated production date for the PRR2 workflow records.
- Preservation: I again ask that the University direct UFIT and all relevant personnel to suspend any automatic deletion or overwriting and preserve all located pages, together with the associated search queries, hit lists, outputs, logs, and metadata. Please confirm preservation in writing; that confirmation costs the University nothing and need not await a hearing date.

The University's affidavit swears that UFIT located over 470 pages through Petitioner's own search terms (Hines Aff. ¶16); the University produced 53 pages, consisting of my own correspondence with its faculty; it has not produced the remainder; and it now intends to move to avoid routine discovery. What is it that the University is unwilling to disclose?

I understand the Court is scheduling a 30-minute case management conference. I was very much hoping that we would be able to move the case along more efficiently. Please provide answers on the above and if there's anything you need from me. Thank you for your cooperation.

Respectfully,

Christopher A. Hanson, Esq.
Florida Bar No. 44094
cahanson77@yahoo.com · 727-409-5738
*Self-represented Petitioner**

On Tuesday, July 14, 2026 at 08:35:24 AM EDT, Kirkconnell,James W <jameswk@ufl.edu> wrote:

Hi Mr. Hanson,

Thank you for your email. Rule 1.630 does not contemplate a reply to a response, so for that reason UF does not take a position on your request for an extension.

My legal assistant will be contacting Judge Keim's office this morning about scheduling a hearing pursuant to FS § 119.11(1) and/or an *in camera* review. Once we hear from the judge we can coordinate a hearing time. At that point the parties can address your discovery requests if necessary.

Lastly, the public records request contained in your email has been forwarded to Mr. Hines and will be processed in due course.

Thanks,
Jim

Jim Kirkconnell
Assistant Counsel
UF Office of General Counsel
(352) 392-1358

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Monday, July 13, 2026 1:57 PM

To: chris hanson <christophhanson77@gmail.com>; universityofflorida@mycusthelp.net; Kirkconnell,James W <jameswk@ufl.edu>

Subject: RE: *Hanson v. University of Florida Board of Trustees, et al.*, No. 01-2026-CA-001794 (Fla. 8th Cir.)

[External Email]

Dear Mr. Kirkconnell:

I am drafting the Reply to the University's Response to the Order to Show Cause. I may need an extra 5–7 days to finish the reply. Do you have any objection to an extension of 7 days?

Additionally, efficiency is my primary objective here. I have encountered enormous, unnecessary obstacles and delays in the courts over the past two years. What I am requesting from UF is

simple. I write separately to give the University the opportunity to resolve the core of this case without further judicial time.

1. Demand for production. Mr. Hines has sworn that UFIT "gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty." (Hines Aff. ¶ 6.) The University produced 53 pages — its correspondence directly with me — and nothing else, explaining the difference only as records that "did not meet the definition of public records" or "concerned individuals having the surname Hanson, but with no relation to the Petitioner." (Hines Aff. ¶ 7.)

The University judged my own letters responsive and produced additional copies back to me; and everything I did not already possess, it withheld. On behalf of Petitioners, I ask that the University produce the remainder of the located pages now. If the University maintains that any located page is exempt, is not a public record, or is not responsive, please identify each such page and state the basis with particularity — whichever of those grounds applies — consistent with the burden the University's own cited authority places on the party resisting production. A response within five (5) business days would allow the parties to narrow the issues before the Court takes them up.

To be clear, the correspondence the University returned to me is not what this case is about. The matters requiring attention are the records I do not have — including the case-number and keyword material the University's filings have not yet addressed. Those issues are framed in the enclosed discovery rather than argued in this letter. I am including the contact for the records custodian department due to the additional public records request attached here to

2. Discovery. Served with this letter are Petitioner's First Requests for Admission, First Set of Interrogatories, and First Request to Produce, each directed to the facts the University itself put in issue through the Hines affidavit: what was searched, what was found, what was withheld, and on what stated basis. Given the statutory priority of this action under Section 119.11(1), Florida Statutes, Petitioner requests that the University respond on an expedited basis; if the University believes discovery in this proceeding requires leave of court or a different schedule, please say so promptly and Petitioner will take the question to the Court rather than let it lie.

3. Depositions. Please provide, within seven (7) days, available deposition dates within the next thirty (30) days for each of the following:

(a) **John Hines**, whose affidavit the University has placed at the center of its Response, and who swears he personally "delivered the responsive public records to Petitioner" on May 4, 2026 (Aff. ¶ 8) — a delivery made by an email that, like every University communication concerning the Request, identified no individual by name or title;

(b) **A University designee under Rule 1.310(b)(6)** with knowledge of the handling of Request No. W018463-032626 — including the identity and role of each person who authored, reviewed, or approved the University's communications to me of March 26, April 23, May 4, and May 8, 2026, each sent unsigned from the University's records-portal mailbox notwithstanding my express, repeated requests that the responsible individual be identified; the searches actually run; and the disposition of the gathered pages; and

(c) **Mr. David Cuillier**, whose correspondence with me constitutes the entirety of the University's production and whose records bear directly on the adequacy of the University's search.

Petitioner offers to coordinate scheduling cooperatively; if the parties are unable to coordinate, Petitioner will raise scheduling with the Court at the Section 119.11(1) hearing. If the University contends that any deposition in this proceeding requires leave of court, please say so promptly.

4. Preservation. Demand is renewed that the University preserve, and direct UFIT and all personnel to preserve: the 470+ pages gathered; all UFIT search outputs, hit lists, queries, and

logs associated with request W018463-032626; the May 4, 2026 delivery package; and all records concerning the handling of the request — on every system and backup where they reside, with associated metadata, and with any automatic deletion or overwriting suspended.

This correspondence is written to resolve issues, not multiply them. If the University will produce the located records or lodge them with the Court per its own footnoted offer, much of what follows becomes unnecessary. I look forward to your prompt response.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

EXHIBIT N

Order entered August 27, 2026 in Hanson v. Thirteenth Judicial Circuit,
No. 25-CA-010255 (Fla. 13th Cir.).

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER HANSON, individually
and as attorney for himself and attorney/
next friend for his minor children,

Plaintiffs/Petitioners,

v.

Case No.: 25-CA-010255

Division: B

THIRTEENTH JUDICIAL CIRCUIT, et al.

Defendants/Respondents.

**ORDER ON "PLAINTIFF'S MOTION FOR SANCTIONS AND ENTRY OF
PEREMPTORY WRIT OF MANDAMUS, OR, ALTERNATIVELY, FOR WRITTEN
ORDER WITH FINDINGS SETTING EVIDENTIARY HEARING" AND
ORDER ON "PLAINTIFF'S COMBINED MOTION FOR INTERLOCUTORY
RECONSIDERATION, REHEARING UNDER FLA. R. CIV. P. 1.530(g), AND
CLARIFICATION ON ORDERS AT DOCKET 80 AND 81"**

THIS CAUSE came before the Court on "Plaintiff's Motion for Sanctions and Entry of Peremptory Writ of Mandamus, or, Alternatively, for Written Order with Findings Setting Evidentiary Hearing," filed on April 15, 2026, and "Plaintiff's Combined Motion for Interlocutory Reconsideration, Rehearing Under Fla. R. Civ. P. 1.530(g), and Clarification on Orders at Docket 80 and 81," filed on May 28, 2026. The Court heard oral argument on August 17, 2026. The Court, having reviewed the motions and the record, heard oral arguments of the parties, and being otherwise fully advised in the premises, hereby finds as follows:

I. APRIL 4, 2025, HEARING VIDEO FOOTAGE

The Court first addresses the issue concerning the April 4, 2025, hearing-room video recording (hereinafter the "Video"). The Court understands that Plaintiff made a public records request seeking release of the Video¹, to which Defendant, the Thirteenth Judicial Circuit Court,

¹ The Plaintiff's request for the Video through the public records pathway tacitly recognizes and is consistent with his original position that the footage is a public record. Notably, Plaintiff has also consistently pointed the Court to broad propositions of law and particular authorities and precedents sounding in Chapter 119 in support of his petition. However, during oral arguments regarding the exemption and good cause issue at the August 17, 2026, hearing there was a lack of clarity on whether or not Plaintiff agreed with the Thirteenth Judicial Circuit that Chapter 119 covers the Video. These conflicts do not need to be clarified or resolved at this stage. The Court will assume for purposes of

has raised section 119.071(3)(a), Florida Statutes, as an exemption. During the August 17, 2026, hearing, the Thirteenth Judicial Circuit represented to this Court that section 119.071(3)(a)3.d., Florida Statutes, allows Plaintiff to obtain the Video footage upon a showing of good cause before a court of competent jurisdiction. The Thirteenth Judicial Circuit further asserted that, were Plaintiff to obtain an order finding good cause, it would not interpose another exemption or objection and would provide Plaintiff the Video. At the hearing, both parties acknowledged that this Court is a court of competent jurisdiction for the purposes of section 119.071(3)(a)3.d., Florida Statutes.

At the hearing, Plaintiff emphatically asserted he has shown good cause and is entitled to the Video footage urgently. This Court accepts Plaintiff's assertion as an *ore tenus* motion for the Court to find good cause for the Thirteenth Judicial Circuit to disclose the Video to Plaintiff under section 119.071(3)(a)3.d., Florida Statutes. As such, it is **ORDERED** that the Thirteenth Judicial Circuit must provide a written response within **seven (7) days** of this Order either: (a) agreeing that there is good cause for Plaintiff to receive the Video; or (b) providing a statement explaining why there is not good cause and therefore the Video should not be provided to Plaintiff.

If Defendants agree that good cause exists, or fail to timely articulate good cause as to why the Video should not be provided, the Court will enter an order finding good cause under section 119.071(3)(a)3.d., Florida Statutes, and direct release of the Video consistent with Defendants' representation to the Court. If Defendants timely articulate a statement they contend shows why there is not good cause and why the Video should not be provided, the Court will resolve the good-cause question expeditiously based upon the parties' submissions.

II. PLAINTIFF'S MOTION FOR SANCTIONS AND ENTRY OF PEREMPTORY WRIT OF MANDAMUS (DOC. 78)

The Court now turns to the remaining issues raised in Doc. 78, addressed in the order in which they appear in that motion. In "Plaintiff's Motion for Sanctions and Entry of Peremptory Writ of Mandamus, or Alternatively, for Written Order with Findings Setting Evidentiary Hearing," Plaintiff requested that the Court (a) enter a peremptory writ of mandamus on the

this analysis only that the original basis for the request, under Chapter 119, is the appropriate framework to apply. This may permit a more prompt resolution of the dispute regarding the Video, or narrow the issues to facilitate resolution with greater judicial economy as appropriate for this type of action. However, to the extent the dispute is not resolved, the Court is not bound by application of this assumption here and may revisit the issue of whether Chapter 119 applies to the Video before issuing a final ruling.

grounds that Defendants waived any claimed exemption as a matter of law; (b) in the alternative, strike Defendants' confidentiality assertion from the record; (c) in the further alternative, impose sanctions on Defendants; (d) in the further alternative, enter a written order identifying and setting an evidentiary hearing on the identified issues of material fact; and (e) granting such other relief the Court deems just and proper.

- (a) As to Plaintiff's request for a peremptory writ of mandamus on the existing record, such request is **DENIED**. When a trial court receives a petition for a writ of mandamus, it must first determine whether the petition is facially sufficient. If the petition is not facially sufficient, the court may dismiss the petition. *See Davis v. State*, 861 So.2d 1214, 1215 (Fla. 2d DCA 2003). If the petition for a writ of mandamus is facially sufficient, the trial court must then issue an alternative writ of mandamus requiring the respondent to show cause why the writ should not be issued. *Moore v. Ake*, 693 So.2d 697, 698 (Fla. 2d DCA 1997). "If the petition and answer to the alternative writ raise disputed factual issues, the trial court must resolve these issues upon evidence submitted by the parties." *Radford v. Brock*, 914 So.2d 1066, 1068 (Fla. 2d DCA 2005). In the instant case, there are factual disputes. Consequently, the Court would err in entering a peremptory writ without a trial on the disputed issues.
- (b) Plaintiff's alternative request to strike Defendants' confidentiality assertion and enter the peremptory writ is **DENIED**. The Court notes that Plaintiff's contention that Defendants "waived" any exemption by failing to provide a privilege log or a Rule 2.420(e) motion is not supported by Florida law.
- (c) Plaintiff's request for sanctions is **DENIED WITHOUT PREJUDICE**. Under Florida Rule of General Practice and Judicial Administration 2.420(i), sanctions are available "[a]fter notice and an opportunity to respond, and on determining that a motion, filing, or other activity described [in the rule] was not made in good faith and was not supported by a sound legal or factual basis" The record at this stage does not establish the bad faith required for sanctions. Likewise, the record at this stage does not show that sanctions are appropriate under chapter 119, Florida Statutes, Florida Rule of Civil Procedure 1.380, section 57.105, Florida Statutes, or the Court's inherent authority.
- (d) As to Plaintiff's request for a written order with findings identifying material facts in genuine dispute and setting an evidentiary hearing, within **fourteen (14) days** from the

date of this Order, Defendants who claim that any responsive record other than the Video is exempt or confidential must file a written statement that, as to each such record: (1) identifies the record by date, author, recipient(s), and general subject matter; and (2) states the specific constitutional, statutory, or rule-based basis for exemption or confidentiality claimed.

- (e) Contemporaneously with the statement required in Paragraph II(d) above, Defendants must tender to the Court, for in-camera inspection, any record as to which an exemption is claimed.

III. PLAINTIFF'S COMBINED MOTION FOR INTERLOCUTORY RECONSIDERATION, REHEARING, AND CLARIFICATION (DOC. 86)

The Court now turns to the issues raised in "Plaintiff's Combined Motion for Interlocutory Reconsideration, Rehearing Under Fla. R. Civ. P. 1.530(g), and Clarification on Orders at Docket 80 and 81," filed on May 28, 2026. In his Motion, Plaintiff requests (a) reconsideration and rehearing of the April 28 Order and that the Court vacate or condition the discovery stay upon Defendants' immediate, prompt production of a record-by-record privilege log; (b) clarification of the Court's compliance under Florida Rules of Civil Procedure 1.630(e) and 1.140(d) to formally rule on the facial legal sufficiency of Defendants' return; (c) clarification as to whether Defendants will be forced to comply with their statutory duties before Plaintiff can be forced to identify disputed facts; (d) clarification as to the Court's intended procedure and timing for hearing and ruling upon Plaintiff's April 15, 2026, Motion for Sanctions and Peremptory Writ; (e) confirmation that the reference to an April 18, 2026 order was a scrivener's error; (f) a toll on Plaintiff's obligation to submit scheduling availability dates under the April 28 Order pending a formal ruling on the clarifications sought in Plaintiff's Motion, and (g) all other relief that justice requires and/or the Court may order.

- (a) To the extent Plaintiff's motion seeks rehearing under Florida Rule of Civil Procedure 1.530(g), Plaintiff's request is **DENIED**. A motion for rehearing under the Rule is appropriate only for final judgments. The two orders challenged by the motion are interlocutory, non-final orders. To the extent Plaintiff's motion requests reconsideration of the April 28, 2026, and May 5, 2026, Orders, the Court **GRANTS IT IN PART** as set forth below.

- a. The Order staying discovery is **NOT VACATED**. However, the parties' obligation to identify disputed facts under the May 5 Order is **TOLLED** until Defendants have complied with the directive to identify any claimed exemptions to responsive records.
- (b) Plaintiff's request for clarification on the facial sufficiency of Defendants' return is **GRANTED** to the following extent: the Court will determine the legal sufficiency of Defendants' return before any final evidentiary hearing is held.
- (c) As to Plaintiff's request for clarification that Defendants must comply with their statutory obligations, the Court **CLARIFIES** that Defendants must make the particularized exemption showing and tender the records for in-camera inspection before Plaintiff is required to identify any disputed facts or before a final evidentiary hearing is set.
- (d) The Court heard the parties' oral arguments on the Motion for Sanctions on August 17, 2026, and is ruling on the motions in the instant Order.
- (e) The Court **CONFIRMS** that the reference to an order "dated April 18, 2026" is a scrivener's error and is corrected to refer to the Order entered on April 28, 2026 (Doc 80).
- (f) Plaintiff's obligation to submit scheduling availability dates under the April 28 Order is **TOLLED** consistent with Paragraph III.(a) above.
- (g) In all other respects, the Motion is **DENIED**.

27TH **DONE AND ORDERED** in Chambers in Clearwater, Pinellas County, Florida, this day of August 2026. A true and correct copy of the foregoing has been furnished to the parties listed below.



SHERWOOD COLEMAN
CIRCUIT COURT JUDGE

Copies furnished to:

Plaintiff
cahanson77@yahoo.com

Defendant Clerk
keiana.wilkerson@akerman.com;

Attorney General
jessica.schwieterman@myfloridalegal.com

EXHIBIT O

Respondents' counsel's August 28, 2026 email stating Respondents' position following the parties' conferral.



Chris Hanson <christophhanson77@gmail.com>

RE: UF's outstanding ministerial duties...

Kirkconnell, James W <jameswk@ufl.edu>

Fri, Aug 28, 2026 at 3:12 PM

To: Chris Hanson <christophhanson77@gmail.com>

Cc: "LoGiurato, Kimberly" <klogiurato@ufl.edu>, "cahanson77@yahoo.com" <cahanson77@yahoo.com>

Hi Mr. Hanson,

Thank you for clarifying that you have not submitted a new public records request.

The University does not agree to a continuance of the September 2, 2026, evidentiary hearing in Alachua County Case No. 01-2026-CA-001794 (the "Hearing"). The University does not agree to hear any matters at the Hearing except as specifically noticed by the Court. The University does not agree to any effort to rehear or reconsider the Court's rulings from the August 24, 2026. The University does not agree to any effort to remove Judge Keim from the case.

Also, I do not agree with your characterization of our prior conversations.

The University will present the testimony of John Hines at the Hearing and in doing so will comply with the Court's *Order Setting Evidentiary Hearing Via Zoom*, dated August 25, 2026. The University will not accept service of process for any other witness.

We just finished our conferral in anticipation of the Hearing. Based on the tenor of that conversation and your personal attacks against me and the University, it is unlikely that I will engage in further conversations with you. As I said I would during our conferral, I have attached the University's proposed stipulations. Please indicate which items you will stipulate to be admitted into evidence at the Hearing. Please send me an itemized list of exhibits so that I can consider which ones I will stipulate.

Thank you,

Jim Kirkconnell

Assistant Counsel

UF Office of General Counsel

(352) 392-1358

From: Chris Hanson <christophhanson77@gmail.com>**Sent:** Thursday, August 27, 2026 7:13 PM**To:** Kirkconnell, James W <jameswk@ufl.edu>**Cc:** LoGiurato, Kimberly <klogiurato@ufl.edu>; cahanson77@yahoo.com**Subject:** Case No. 01-2026-CA-001794: witness availability for the September 2 hearing; conferral under the August 25 Order

[External Email]

[Quoted text hidden]



Exhibit List.pdf

130K

EXHIBIT P

Compiled key pages of the University's W018964-060526 processing-file production, with index. EXCERPT: the complete 741-page production is of record at Filing 255904665.

EXHIBIT P

Compiled key pages of the University's W018964-060526 processing-file production (produced by the University July 17, 2026; the complete production was filed with this Court on August 28, 2026, Filing 255904665, and is Petitioner's Exhibit K)

Ex. P p.	Source page	Content
2	emails_1 p. 11	3/30/26 11:49 a.m. Custodian to Cuillier: "no text messages and/or Signal/WhatsApp messages"
3	emails_1 p. 23	3/30/26 12:48 p.m. UFIT: "103 message(s) ... 330 page(s)"
4	emails_1 p. 26	3/30/26 12:51 p.m. Custodian: text messages "that don't specifically relate"
5	emails_1 p. 36	3/30/26 2:14 p.m. Wood: "In addition to the 10 pages from" (sentence stops); the 340-page figure
6	emails_1 p. 119	5/4/26 10:40 a.m. UFIT: search "stalled"; "17 other messages ... should have been included"; the 109-page rerun routed 11:11 a.m.
7	emails_1 p. 120	5/4/26 9:29 a.m. Custodian: "can you let us know why this email was not included"
8	emails_1 p. 190	5/5/26 8:53 a.m. Bambauer on her text messages; 5/6/26 5:14 p.m. Quillen circulating the full term list; 5/6/26 5:33 p.m. Cuillier: "a few dozen emails"
9	emails_1 p. 222	5/7/26 9:07 a.m. UFIT keyword chart for the original search (nine keywords with counts)
10	emails_2 p. 252	5/7/26 9:16 a.m. Quillen extraction instruction; 10:10 a.m. UFIT delivery (SpecificKeywords.pdf)
11	emails_2 p. 275	5/7/26 10:28 a.m. Wood: "the 621 pages received from UFIT on 04/24/26"; "(88 PAGES)"
12	emails_1 p. 1	3/26/26 2:00 p.m. The request, routed to counsel Quillen and Kirkconnell the day it arrived
13	emails_1 p. 68	4/23/26 12:25 p.m. Quillen: "You can let him know that his request is undergoing the legal review."
14	emails_1 p. 72	4/23/26 12:39 p.m. The University's portal to Petitioner: "Your request is undergoing the legal review."
15	emails_1 p. 280	5/7/26 10:39 a.m. The third mailbox: "This search concluded with no results"; the complete 21-term list and the Dec. 1, 2024 to Mar. 26, 2026 date range
16	Granicus portal action log	Granicus portal action log: the 3-day staff reminder of 3/31/26 and the 5-day reminder of 4/2/26
17	emails_1 p. 116	5/4/26 9:10 a.m. Bambauer forwards to the custodian the March 25, 2026 email the search missed; 9:11 a.m. custodian forwards it to Quillen

Every page above is reproduced from the University's own production, unaltered. This index is Petitioner's.

From: Hines,John
Sent time: 03/30/2026 11:49:09 AM
To: Cuillier, David
Cc: Quillen,Amy; Wood,Barbara L
Subject: RE: Public Records Request: W018463-032626

Thanks for the quick response, Dave

If you could go ahead and send over those messages that would be helpful and let us know a page count

Just to confirm, there are no text messages and/or Signal/WhatsApp messages from what was being asked for?

The individual also asked for "internal memoranda, notes, and draft research or survey data" that I had not highlighted in the text below, were there any responsive materials?

-John

From: Cuillier, David <cuillierd@ufl.edu>
Sent: Monday, March 30, 2026 11:39 AM
To: Hines,John <jkhines@ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Public Records Request: W018463-032626

Happy to provide. All I have are the emails between me and Mr. Hanson, on my UF email account. Should I forward those to you?

Dave

From: Hines,John <jkhines@ufl.edu>
Sent: Monday, March 30, 2026 11:35 AM
To: Cuillier, David <cuillierd@ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>
Subject: Public Records Request: W018463-032626

Hi David-

Please see below for the highlighted part of this public records request and determine if you have responsive records. As a reminder, only existing public records should be provided. The Florida Public Record laws do not require the university to create new records in response to a request. The IT Department is handling the email search.

The individual wrote:

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"

- B. Specific Case Numbers: "25-CA-10255", "24-DR-061150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"

From: UFIT-eDiscovery
Sent time: 03/30/2026 12:48:13 PM
To: Hines,John
Cc: Quillen,Amy; Wood,Barbara L; UFIT-eDiscovery
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hello John,

This search concluded with 103 message(s), which resulted in 330 page(s). No attachments were included.

Location to download associated files:

<https://www.dropbox.com/scl/fo/tu7uror3harudqrs4hcf0/AlxizVgtUyiQQFNa48zjHXI?rlkey=3d0hwgrpu5j6oicu8oug1ntks&st=qef3l4ls&dl=0>

Search Strategy for ISS-444193-W018463-032626

Mailboxes(2) to Search:

Cuillier,David

UFID: 97484080
GLID: cuillierd
Affiliation: T - STAFF
Department: 23040300-CJC-BRECHNER CENTER
Email: cuillierd@ufl.edu

Bambauer,Jane

UFID: 24179662
GLID: janebambauer
Affiliation: F - FACULTY
Department: 23040000-CJC-JOURNALISM
Email: janebambauer@ufl.edu

Date Range:

December 1, 2024 to March 26, 2026

Keywords/Criteria (in subject or body):

"Christopher Hanson"
"Chris Hanson"
cahanson77@yahoo.com
"Hanson"
"25-CA-10255"
"24-DR-001150"
"2025-CA-002469"
"2D2025-1936"
"2D2025-0681"
"2D2026-0279"
"13th Circuit"
"Scott Davis"
"Judge Kelly Ayers"
"Judge Matthew Felix"
"Gina Justice"
"Vivian Hodz"
"Judge Sherwood Coleman"
"Grace Samarkos"
"Florida Bar Mandamus"
"surveillance video"
"insider protectionism"

--

Thank you,

Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square

From: Hines, John
Sent time: 03/30/2026 12:51:08 PM
To: Bambauer, Jane
Cc: Quillen, Amy; Wood, Barbara L
Subject: RE: Public Records Request: W018463-032626

Thanks Jane!

Yes, what you have written makes sense – we are having IT conduct the email search and I don't believe we would need any text messages that don't specifically relate to what the person had asked for

John

From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Monday, March 30, 2026 12:19 PM
To: Hines, John <jkhines@ufl.edu>
Cc: Quillen, Amy <abquillen@ufl.edu>; Wood, Barbara L <blwood@ufl.edu>
Subject: Re: Public Records Request: W018463-032626

Hello,

As far as I know, the only responsive record I have with any of the names is an email that Chris Hanson sent to me. I can forward that if you need it, but since "email" wasn't highlighted I assume you have access and are just seeking my help with text messages and DMs.

I may have text messages that refer to the 13th Circuit (the most general of the search terms) but it will have nothing to do with Chris Hanson or his cases. Since I am a lawyer who keeps track of all sorts of cases, I don't think it's appropriate to have to search my personal communications for references to the 13th circuit that are not related. Does that make sense?

Get [Outlook for Mac](#)

From: Hines, John <jkhines@ufl.edu>
Date: Monday, March 30, 2026 at 11:36 AM
To: Bambauer, Jane <janebambauer@ufl.edu>
Cc: Quillen, Amy <abquillen@ufl.edu>, Wood, Barbara L <blwood@ufl.edu>
Subject: Public Records Request: W018463-032626

Professor Bambauer-

Please see below for the highlighted part of this public records request and determine if you have responsive records. As a reminder, only existing public records should be provided. The Florida Public Record laws do not require the university to create new records in response to a request. The IT Department is handling the email search.

The individual wrote:

"Dear Custodian of Public Records for the University of Florida:

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This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data that contain any of the following names, email addresses, case numbers, or keywords:

From: Wood,Barbara L
Sent time: 03/30/2026 02:14:29 PM
To: Hines,John; Quillen,Amy
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

All,

In addition to the 10 pages from I am in receipt of potentially responsive records (330 PAGES; EXCLUDING Attachments) from UFIT (03/30/26) regarding the PRR from W018463-032626. Based on the number of pages (340), SHALL I PREPARE AN INVOICE?

I have copied the records to Amy Q's PRR U: Drive to be reviewed by the General Counsel and for approval to be released at: W018463-032626\Fr UFIT 03-30-26\ISS-444193-W018463-032626-103-330-opt.pdf.

Thank you,

Barbara L. Wood, FRP

Legal Assistant II

Office of the Vice President and General Counsel

University of Florida

PO Box 113125

123 Tigert Hall

Gainesville, FL 32611

352-392-1358 office

352-392-4387 fax

blwood@ufl.edu



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From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Monday, March 30, 2026 12:48 PM
To: Hines,John <jkhines@ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hello John,

This search concluded with 103 message(s), which resulted in 330 page(s). No attachments were included.

Location to download associated files:

<https://www.dropbox.com/sc/fo/tu7uror3harudqrs4hcf0/AlxizVgtUyiQQFNa48zjHXI?rlkey=3d0hwgrpu5j6oicu8oug1ntks&st=qef3l4ls&dl=0>

Search Strategy for ISS-444193-W018463-032626

Mailboxes(2) to Search:

Cuillier,David

UFID: 97484080

GLID: cuillierd

Affiliation: T - STAFF

Department: 23040300-CJC-BRECHNER CENTER

Email: cuillierd@ufl.edu

From: Wood,Barbara L
Sent time: 05/04/2026 11:11:08 AM
To: Hines,John; Quillen,Amy
Subject: W018463-032626 RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

All,

I am in receipt of potentially responsive records (109 rerun PAGES; EXCLUDING Attachments) from UFIT (05/04/26) regarding the PRR from W018463-032626. Based on the number of pages, SHALL I PREPARE AN INVOICE?

I have copied the records to Amy Q's PRR U: Drive to be reviewed by the General Counsel and for approval to be released at: W018463-032626\Fr UFIT 05-04-26.

Thank you,

Barbara L. Wood, FRP

Legal Assistant II

Office of the Vice President and General Counsel

University of Florida

PO Box 113125

123 Tigert Hall

Gainesville, FL 32611

352-392-1358 office

352-392-4387 fax

blwood@ufl.edu



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From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>

Sent: Monday, May 4, 2026 10:40 AM

To: Hines,John <jkhines@ufl.edu>

Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>

Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

I have looked into the original search, and it appears that our search tool stalled before completing the search of Professor Bambauer's mailbox. After March 9th, 2026, no further emails were identified in her mailbox, whereas David Cuillier's mailbox was run through the entire requested date range. This is likely an indexing error.

When locating this message, the tool also identified 17 other messages that matched the criteria and should have been included previously. I have included those in PDF format as well.

Please see the Dropbox link attached below for those files:

<https://www.dropbox.com/scl/fo/sr966qqgejewbuilr56ls/AHlqcl9qLHkJ0ZKQ6v8PRQ0?rlkey=l3vfxgbqu7ogaztyrej1kfli3&st=w2m5xj6r&dl=0>

Thank you,

Daniel Quiros

Cybersecurity Engineer

UF Information Technology

Ayers @ Innovation Square

720 SW 2nd Ave | North Tower, Suite 420

(352) 273-5039

<https://it.ufl.edu/>

From: Hines, John <jkhines@ufl.edu>
Sent: Monday, May 4, 2026 9:29 AM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Cc: Wood, Barbara L <blwood@ufl.edu>; Quillen, Amy <abquillen@ufl.edu>
Subject: FW: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Good morning-

In going over the review for this request, can you let us know why this email was not included in the search that was done for W018463-032626?

Also, can you please provide the message in the thread below as a PDF from Professor Bambauer's mailbox:

"From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Date: Wednesday, March 25, 2026 at 8:55 AM
To: Bambauer, Jane <janebambauer@ufl.edu>"

Thanks!
John

From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Monday, May 4, 2026 9:10 AM
To: Hines, John <jkhines@ufl.edu>
Subject: FW: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

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From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Date: Wednesday, March 25, 2026 at 8:55 AM
To: Bambauer, Jane <janebambauer@ufl.edu>
Subject: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

[External Email]

Good morning. I received your contact information from Mr. Cuillier in the chain below. As you will see I have two lawsuits pending related to public records violations and intentional concealment of records that would be embarrassing for some state officials. It's really a rather extreme situation that I've been dealing with for nearly two years. I'm really hoping that there is someone within the university apparatus that is able to assist me in pushing back against this state overreach.

I have extensive documentation to support all of my allegations. I am an attorney in the state of Florida. I have a perfectly clean disciplinary record other than a current sitting judge filing a clearly baseless and retaliatory bar complaint against me. It is directly related to the public records violations.

Please let me know if you can offer any guidance or assistance in this matter.

Thank you for your cooperation

Chris Hanson

----- Forwarded Message -----

From: Cuillier, David <cuillierd@ufl.edu>
To: cahanson77@yahoo.com <cahanson77@yahoo.com>; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>
Sent: Thursday, March 19, 2026 at 10:41:22 AM EDT
Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

Sorry to bum you out. As I said, it's not our mission to connect people to journalists – it's just not what we do (nor do we do public statements, amici, etc.). Jane Bambauer, the First Amendment prof also is not tasked with connecting people to journalists – she does research. You can reach out to her if you want: janebambauer@ufl.edu

From: Cuillier, David
Sent time: 05/06/2026 05:33:36 PM
To: Quillen,Amy; Bambauer, Jane; Hines,John
Cc: Wood,Barbara L
Subject: RE: Public Records Request: W018463-032626

I don't have any regarding those case numbers (or any case numbers). I don't know what any of those terms are (or any of the individuals). However, when I do a search for "surveillance video" it comes up with a few dozen emails from the past several years, unrelated to Mr. Hanson. If you want IT to pull those, feel free to do so.

Dave

From: Quillen,Amy <abquillen@ufl.edu>
Sent: Wednesday, May 6, 2026 5:14 PM
To: Bambauer, Jane <janebambauer@ufl.edu>; Hines,John <jkhines@ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Public Records Request: W018463-032626

Hi All,

Another question: For the time period requested, do you have any communications or other documents with the following terms?:

- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"

- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

I'm primarily asking about communications other than email, since UF IT conducted that search. Although the requester is not precisely clear, it could be that he is seeking any public record referencing one or more of these terms whether or not related to him.

Thanks again,

Amy

Amy B. Quillen
Associate Counsel
Office of the General Counsel
University of Florida
(352) 392-1358

From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Tuesday, May 5, 2026 8:53 AM
To: Hines,John <jkhines@ufl.edu>; Cuillier, David <cuillierd@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>
Subject: Re: Public Records Request: W018463-032626

All of my references to "Hanson" in my text messages refer to my friend Robin Hanson. I just checked my text messages to Dave to make sure.

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From: Hines,John <jkhines@ufl.edu>
Date: Tuesday, May 5, 2026 at 11:37 AM
To: Cuillier, David <cuillierd@ufl.edu>, Bambauer, Jane <janebambauer@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>, Quillen,Amy <abquillen@ufl.edu>
Subject: FW: Public Records Request: W018463-032626

From: UFIT-eDiscovery
Sent time: 05/07/2026 09:07:06 AM
To: Hines,John
Cc: Wood,Barbara L; Quillen,Amy; UFIT-eDiscovery
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

No problem at all – here is the keyword chart from the original search as well:

Keyword	Message	Percent
Hanson	113	98.26%
13th Circuit	27	23.48%
Chris Hanson	27	23.48%
cahanson77@yahoo.com	25	21.74%
2025-CA-002469	2	1.74%
25-CA-10255	2	1.74%
Judge Kelly Ayers	2	1.74%
Judge Matthew Felix	2	1.74%
surveillance video	2	1.74%

Thank you,
Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square
720 SW 2nd Ave | North Tower, Suite 420
(352) 273-5039
<https://it.ufl.edu/>

How did we do? [Please rate our service.](#)

From: Hines,John <jkhines@ufl.edu>
Sent: Thursday, May 7, 2026 9:00 AM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi Daniel-

Can we have the keywords chart for both of the searches that were done for this one?

Sorry for the confusion, thanks!
John

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Thursday, May 7, 2026 8:49 AM
To: Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

Please see the keyword chart for this search below:

Keyword	Message	Percent
Hanson	18	100.00%
Chris Hanson	1	3.45%
cahanson77@yahoo.com	1	3.45%
13th Circuit	1	3.45%

Thank you,
Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square

From: UFIT-eDiscovery
Sent time: 05/07/2026 10:10:32 AM
To: Quillen,Amy; Hines,John
Cc: Wood,Barbara L; UFIT-eDiscovery
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119
Attachments: ISS-444193-W018463-032626-16-88-opt-SpecificKeywords.pdf

Hi Amy,

Certainly – I have included any results containing those search terms in the attached PDF.

Thank you,
Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square
720 SW 2nd Ave | North Tower, Suite 420
(352) 273-5039
<https://it.ufl.edu/>
How did we do? [Please rate our service.](#)

From: Quillen,Amy <abquillen@ufl.edu>
Sent: Thursday, May 7, 2026 9:16 AM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>; Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi Daniel,

One more thing: can you pull out the results with the search terms 13th Circuit, 2025-CA-002469, 25-CA-10255, Judge Kelly Ayers, Judge Matthew Felix, and surveillance video? If yes, please provide those results as a separate pdf.

Thanks again for your help,

Amy

Amy B. Quillen
Associate Counsel
Office of the General Counsel
University of Florida
(352) 392-1358

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Thursday, May 7, 2026 6:07 AM
To: Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

No problem at all – here is the keyword chart from the original search as well:

Keyword	Message	Percent
Hanson	113	98.26%
13th Circuit	27	23.48%
Chris Hanson	27	23.48%
cahanson77@yahoo.com	25	21.74%
2025-CA-002469	2	1.74%
25-CA-10255	2	1.74%
Judge Kelly Ayers	2	1.74%
Judge Matthew Felix	2	1.74%
surveillance video	2	1.74%

From: Wood,Barbara L
Sent time: 05/07/2026 10:28:19 AM
To: Quillen,Amy; Hines,John
Subject: W018463-032626 RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

621 88

All,

In addition to the 621 pages received from UFIT on 04/24/26, I am in receipt of additional potentially responsive records (88 PAGES) from UFIT (05/07/26) regarding the PRR from W018463-032626?. Based on the number of pages, let me know if we need to prepare an invoice?

I have copied the records to Amy Q's PRR U: Drive to be reviewed by the General Counsel and for approval to be released at: W018643-042326Fr UFIT 05-07-26ISS-444193-W018463-032626-16-88-opt-SpecificKeywords.pdf.

Thank you,

Barbara L. Wood, FRP

Legal Assistant II

Office of the Vice President and General Counsel

University of Florida

PO Box 113125

123 Tigert Hall

Gainesville, FL 32611

352-392-1358 office

352-392-4387 fax

blwood@ufl.edu



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From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Thursday, May 7, 2026 10:11 AM
To: Quillen,Amy <abquillen@ufl.edu>; Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi Amy,

Certainly – I have included any results containing those search terms in the attached PDF.

Thank you,
Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square
720 SW 2nd Ave | North Tower, Suite 420
(352) 273-5039
<https://it.ufl.edu/>
How did we do? [Please rate our service.](#)

From: Quillen,Amy <abquillen@ufl.edu>
Sent: Thursday, May 7, 2026 9:16 AM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>; Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

From: Hines, John
Sent time: 03/26/2026 02:00:37 PM
To: Quillen, Amy; Kirkconnell, James W
Cc: Wood, Barbara L
Subject: Public Records Request: W018463-032626

Can we discuss this one at our meeting on Monday?

"Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- Format: Please produce all records electronically in their native format or as PDFs.
- Exemptions & Privilege Log: If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production.

Chris Hanson
Christopher A. Hanson, Esq.
FL Bar #44094
727-409-5738
cahanson77@yahoo.com"

From: Quillen,Amy
Sent time: 04/23/2026 12:25:18 PM
To: Hines,John
Cc: Wood,Barbara L
Subject: RE: Public Records Request: W018463-032626

You can let him know that his request is undergoing the legal review.

Amy

Amy B. Quillen
Associate Counsel
Office of the General Counsel
University of Florida
(352) 392-1358

From: Hines,John <jkhines@ufl.edu>
Sent: Wednesday, April 22, 2026 4:43 PM
To: Quillen,Amy <abquillen@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Public Records Request: W018463-032626

Hi Amy-

The requestor wrote the following, please advise on the response:

On 4/22/2026 9:54:15 AM, Chris Hanson (cahanson77@yahoo.com) wrote:

Good morning. I logged in and it appears my request was forwarded for processing. Can you please let me know the status and results of the search so far? Is there an estimate for when a complete response will be available? Thank you.

Chris Hanson
727-409-5738

From: Quillen,Amy <abquillen@ufl.edu>
Sent: Friday, April 3, 2026 9:15 AM
To: Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Public Records Request: W018463-032626

I think very little of this may be responsive, so no invoice for now.

Amy

Amy B. Quillen
Associate Counsel
Office of the General Counsel
University of Florida
(352) 392-1358

From: Hines,John <jkhines@ufl.edu>
Sent: Friday, April 3, 2026 9:07 AM
To: Quillen,Amy <abquillen@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>
Subject: FW: Public Records Request: W018463-032626

Hi Amy-

Did you want me to provide the chart below to the requestor or did you want to invoice for the 340 pages?

John

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Tuesday, March 31, 2026 1:29 PM

From: University of Florida Records Support Center <universityofflorida@mycusthelp.net>
Sent time: 04/23/2026 12:39:00 PM
To: cahanson77@yahoo.com
Subject: Public Records Request :: W018463-032626

[External Email]

--- Please respond above this line ---

Dear Chris Hanson,

Your request is undergoing the legal review.

Sincerely,
University of Florida Public Records Request Center

On April 22, 2026, you had written:

"Good morning. I logged in and it appears my request was forwarded for processing. Can you please let me know the status and results of the search so far? Is there an estimate for when a complete response will be available? Thank you."

To monitor the progress or update this request please log into the [Public Records Center](#).

From: UFIT-eDiscovery
Sent time: 05/07/2026 10:39:24 AM
To: Hines,John
Cc: Quillen,Amy; Wood,Barbara L; UFIT-eDiscovery
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hi John,

This search concluded with no results.

Search Strategy for ISS-444193-W018463-032626

Mailbox to Search:

Sunne,Samantha

UFID: 26849549
GLID: samanthasunne
Affiliation: E - EMPLOYEE
Department: 23040300-CJC-BRECHNER CENTER
Email: samanthasunne@ufl.edu

Date Range:

December 1, 2024 to March 26, 2026

Keywords/Criteria (in subject or body):

"Christopher Hanson"
"Chris Hanson"
cahanson77@yahoo.com
"Hanson"
"25-CA-10255"
"24-DR-001150"
"2025-CA-002469"
"2D2025-1936"
"2D2025-0681"
"2D2026-0279"
"13th Circuit"
"Scott Davis"
"Judge Kelly Ayers"
"Judge Matthew Felix"
"Gina Justice"
"Vivian Hodz"
"Judge Sherwood Coleman"
"Grace Samarkos"
"Florida Bar Mandamus"
"surveillance video"
"insider protectionism"

--

Thank you,

Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square
720 SW 2nd Ave | North Tower, Suite 420
(352) 273-5039
<https://it.ufl.edu/>

How did we do? [Please rate our service.](#)

From: Hines,John <jkhines@ufl.edu>
Sent: Thursday, May 7, 2026 10:26 AM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

04/02/2026 02:01:07 PM	SLA	Using SLA Rule 2, Sent notification to staff(s): John Hines using 'STAFF - 5 Day Reminder' template	Click to view details		
03/31/2026 02:01:03 PM	SLA	Using SLA Rule 1, Sent notification to staff(s): John Hines using 'STAFF - 3 Day Reminder' template	Click to view details		
03/26/2026 01:57:45 PM	Hines, John	Attached file	public_records_request_to_UF_and_Brechner.pdf		
03/26/2026 01:57:44 PM	Customer	Sent confirmation message to customer	Subject: Public Records Request :: W018463-032626 Body: [Message Truncated...]		Sent confirmation message to Chris Hanson (cahanson77@yahoo.com)
03/26/2026 01:57:26 PM	Hines, John	Request was created by staff			
03/26/2026 01:57:13 PM	Hines, John	Status	Forwarded Request for Processing	New Request	

From: Hines, John
Sent time: 05/04/2026 09:11:47 AM
To: Quillen, Amy
Cc: Wood, Barbara L
Subject: FW: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi Amy-

FYI on this email from Jane – I will put it on the U drive at W018463-032626

John

From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Monday, May 4, 2026 9:10 AM
To: Hines, John <jkhines@ufl.edu>
Subject: FW: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

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From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Date: Wednesday, March 25, 2026 at 8:55 AM
To: Bambauer, Jane <janebambauer@ufl.edu>
Subject: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

[External Email]

Good morning. I received your contact information from Mr. Cuillier in the chain below. As you will see I have two lawsuits pending related to public records violations and intentional concealment of records that would be embarrassing for some state officials. It's really a rather extreme situation that I've been dealing with for nearly two years. I'm really hoping that there is someone within the university apparatus that is able to assist me in pushing back against this state overreach.

I have extensive documentation to support all of my allegations. I am an attorney in the state of Florida. I have a perfectly clean disciplinary record other than a current sitting judge filing a clearly baseless and retaliatory bar complaint against me. It is directly related to the public records violations.

Please let me know if you can offer any guidance or assistance in this matter.

Thank you for your cooperation

Chris Hanson

----- Forwarded Message -----

From: Cuillier, David <cuillierd@ufl.edu>
To: cahanson77@yahoo.com <cahanson77@yahoo.com>; cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>
Sent: Thursday, March 19, 2026 at 10:41:22 AM EDT
Subject: RE: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

Sorry to bum you out. As I said, it's not our mission to connect people to journalists – it's just not what we do (nor do we do public statements, amici, etc.). Jane Bambauer, the First Amendment prof also is not tasked with connecting people to journalists – she does research. You can reach out to her if you want: janebambauer@ufl.edu

I understand your frustration and wanting to get off the phone, but I was going to refer you to some other folks who might help, who do connect people to journalists/legal help on these issues :

- [Florida First Amendment Foundation](#) – they deal with FOI and First Amendment issues.
- New [First Amendment law clinic at FSU](#) – their mission is to help people with these problems.
- [Florida Center for Government Accountability](#) (they have their own publication, the Trident, that writes about these issues)
- ACLU and FIRE sometimes pick up these issues.

EXHIBIT Q

Petitioner's April 22, 2026 status follow-up, printed with the University's March 26, 2026 receipt confirmation. Verified Petition, App. 6-9.

Interior pages carry the Petition Appendix's own label, EXHIBIT B, and App. numbers. The controlling designation is Hearing Exhibit Q.

EXHIBIT B

Petitioner's April 22, 2026 Status Follow-Up

*Printed together with the University's March 26, 2026 receipt confirmation
quoting the request.*

Re: Public Records Request :: W018463-032626

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: universityofflorida@mycusthelp.net

Bcc: truthoverchaos@outlook.com

Date: Wednesday, April 22, 2026 at 09:52 AM EDT

Good morning. I logged in and it appears my request was forwarded for processing. Can you please let me know the status and results of the search so far? Is there an estimate for when a complete response will be available? Thank you.

Chris Hanson
727-409-5738

On Thursday, March 26, 2026 at 01:59:04 PM EDT, University of Florida Records Support Center <universityofflorida@mycusthelp.net> wrote:



Dear Chris Hanson:

This message confirms the university's receipt of your request for public records request on 3/26/2026. You may track the progress of your request using reference number W018463-032626.

Request: Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically 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.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- A. Names and Contact Information: "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- B. Specific Case Numbers: "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- C. Targeted Keywords, Individuals & Subjects: "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- Catch-All & Personal Devices: This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- Format: Please produce all records electronically in their native format or as PDFs.
- Exemptions & Privilege Log: If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production.

The university will review your request. If we need clarification or have a question, we will contact you.

Please also note: Email searches will not include attachments unless specifically requested.

Our scheduled office hours are Monday through Friday, 8:00 a.m. - 5:00 p.m. Requests received on weekends or holidays will be handled on the next business day.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been completed.

Sincerely,

University of Florida Public Records Request Center

To monitor the progress or update this request please log into the [Public Records Center](#).

EXHIBIT R

The University's April 23, 2026 response: the request is "undergoing the legal review." Verified Petition, App. 10-11.

Interior pages carry the Petition Appendix's own label, EXHIBIT C, and App. numbers. The controlling designation is Hearing Exhibit R.

EXHIBIT C

University of Florida Response of April 23, 2026: Request “Undergoing
the Legal Review”

Fw: Public Records Request :: W018463-032626

From: cahanson77@yahoo com cahanson77@yahoo com
To: truthoverchaos@outlook com; christophhanson77@gmail com
Date: Thursday April 2 2 26 at 2: PM EDT

----- Forwarded Message -----

From: University of Florida Records Support Center <universityofflorida@mycusthelp net>
To: cahanson77@yahoo com <cahanson77@yahoo com>
Sent: Thursday April 2 2 26 at 2: 9: PM EDT
Subject: Public Records Request :: W 846 - 2626

--- Please respond above this line ---

Dear Chris Hanson

Your request is undergoing the legal review

Sincerely

University of Florida Public Records Request Center

On April 22 2 26 you had written:

Good morning I logged in and it appears my request was forwarded for processing Can you please let me know the status and results of the search so far? Is there an estimate for when a complete response will be available? Thank you

To monitor the progress or update this request please log into the Public Records Center

EXHIBITS G AND K

Exhibit G

Respondents' Motion for Protective Order with Composite Exhibits A through D, Filing 253616687, July 30, 2026. Respondents' own filing, of record. Incorporated by reference and relied on in full.

Exhibit K

The University's W018964-060526 production, Filing 255904665, August 28, 2026, 741 pages. Respondents' production, of record. Incorporated by reference; the pages Petitioner cites are Exhibit P.