

**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.

_____ /

CLOSING ARGUMENT AND LEGAL BRIEF

COMES NOW, Respondent, the University of Florida Board of Trustees (the “University”), and submits it *Closing Argument and Legal Brief* as directed by the Court at the September 2, 2026, Evidentiary Hearing held in this case (the “Hearing”), and states:

Introduction

This case is simple. The Petitioner asked the University for public records related to himself. The University then searched for, located, reviewed, and delivered those records—all of them—to the Petitioner. Nonetheless, Petitioner is convinced that the University is part of a vast conspiracy. This conspiracy involves multiple judges, court staff, major media organizations, and the Florida Bar, all working together to deny him, and *only* him, access to public records. At the Hearing, when faced with unrebutted facts dispelling this conspiracy theory, he declared that “someone needs to attack” the Court:

(21) MR. HANSON: Okay. What you’re doing is
(22) far worse to me, your Honor, far, far worse.
(23) You’re gaslighting me. Asking me to -- asking

(24) me to go along with this charade, where you just
(25) want me to shut up.

(1) THE COURT: Mr. Hanson, quit attacking the
(2) Court.

(3) MR. HANSON: You deserve it, your Honor.
(4) Someone needs to.

(5) THE COURT: Ask questions -- ask the
(6) witness questions.

(7) MR. HANSON: Someone needs to attack you.

(TR. 56:21-57:7, emphasis added).¹

In light of his egregious conduct and other examples of improper behavior, the University respectfully requests that, in addition to denying his petition, the Court find that Petitioner has participated in this action for an improper purpose under § 119.12(3), Fla. Stat.

Procedural History and Governing Law

Petitioner filed his *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") on June 4, 2026. The Court entered its *Order to Show Cause* on June 12, 2026, and the University duly submitted its response to the Petition July 7, 2026. Petitioner replied on July 14, 2026. The University then asked for a hearing pursuant to § 119.11(1). Petitioner, in contravention of Fla. R. Civ. P. 1.200, improperly insisted upon a case management hearing, which the Court's office inadvertently scheduled. The Court then conducted a hearing on August 24, 2026, during which the Court dispensed with case management procedures, entered a protective order as to Petitioner's abusive discovery requests, and indicated that an evidentiary hearing would be set immediately per § 119.11(1), Fla. Stat. On September 2,

¹ References to the Hearing transcript will be denoted as "(TR. [page]:[line])."

2026, the Court conducted the evidentiary hearing required by § 119.11(1), Fla. Stat. (the “Hearing”).

“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). 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). “This threshold determination is crucial.” *Id.*

“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). Petitioner failed to carry his burden of proof at the Hearing. Rather, the unrebutted evidence demonstrated the University’s compliance. Under Florida law, “[a] court must accept evidence which...is neither impeached, discredited, controverted, contradictory within itself, or physically impossible.” *State v. Fernandez*, 526 So. 2d 192, 193 (Fla. 3d DCA 1988), *cause dismissed*, 531 So. 2d 1352 (Fla. 1988).

Evidence Presented

As previously stated, Petitioner bore the burden of proof at the Hearing. *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) (holding that the plaintiff requestor bears the burden, and “the circuit court misplaced the burden of proof on the defendant Office.”). The first two elements of

Petitioner's claim are not at issue. The parties agree that Petitioner made a request and that the University acknowledged it. As for the third element—the existence of responsive public records—Petitioner failed to present any evidence showing that such records exist. In fact, the evidence adduced proved the exact opposite. Therefore, Petitioner also failed to meet the last element—that the University refused to produce such records. *See id.*

The Court allotted 90 minutes for the presentation of evidence and elected to forego opening statements. (TR. 5:17-22). The Court later extended the Hearing time by an additional hour. (TR. 128:13-17). The parties stipulated to the admission of exhibits identified in the University's Exhibit List, respectively marked as "A" through "FF."² (TR. 10:19-11:1). The Court heard testimony from three witnesses: Dr. David Cuillier, Professor Jane Bambauer, and the University's records custodian, John Hines. Petitioner did not identify any other witnesses during the Hearing, except himself, or attempt to call any additional witnesses.³ (TR. 888-12).

In the Court's own words, Petitioner did not use his time "very wisely." (TR. 128:21-23). This included asking witnesses to speculate on topics not at issue, to comment on emails to which they were not a party, to elicit unauthorized opinion testimony, and to accuse witnesses of conspiring against him. Petitioner also managed to have these witnesses establish dispositive facts which totally defeated his claim; namely, the evidence showed that the University located all documents responsive to his request and then delivered those documents to Petitioner without redaction.

The first witness to testify was Dr. David Cuillier, who is the director of the Brechner Center at the University's College of Journalism and Communications. (TR. 16:3-5). As described

² References to these exhibits will be denoted as "(Exh. ___, pg. ___)," with the page number corresponding to the bookmarked pdf version of the Exhibit List submitted to the Court and parties prior to the Hearing.

³ Petitioner has since moved for an order to show cause based on the non-appearance of a witness he never called or even mentioned at the Hearing.

from the University, that meant by definition that the University had complied with Chapter 119. Stated differently, all of the records matching Petitioner’s request—that is, related to him and involving Dr. Cuillier and Prof. Bambauer—were delivered to Petitioner. *See Doe v. DeSantis*, 390 So. 3d 1245, 1249 (Fla. 1st DCA 2024), *reh’g denied* (Aug. 2, 2024) (“A public records request must be specific enough for the records custodian to perform the requested action.”). It cannot be possible for the University to have violated Chapter 119 at the same time it produced all records responsive to Petitioner’s request.

Petitioner also included keywords in his original request likely to snare documents unrelated to himself, including “Hanson,” a common surname, and “surveillance video.” (Ex. A, pg. 5). In Petitioner’s worldview, these various keywords would help him expose the cabal of dark forces arrayed against him. In practice, however, they produced many records having absolutely nothing to do with Petitioner. (Ex. AA, pg. 165).

The evidence showed that the University records custodian, Mr. Hines, coordinated the search for responsive documents by initially contacting Dr. Cuillier and Prof. Bambauer,⁵ as well as UF Information Technologies (“UFIT”). (TR. 112:1-6; Ex. G, pg. 83-84). Using search parameters taken directly from Petitioner’s request, Mr. Hines worked directly with UFIT to coordinate email searches of Dr. Cuillier’s, Prof. Bambauer’s emails, and, later, Samantha Sunne’s⁶ mailbox. (TR. 112:1-6; TR. 1138-21; TR. 120:10-121:2; Ex. G, pg. 82-83; Ex. X, pg. 147; Ex. Y, pg. 152-155; Ex. FF, pg. 189). These reasonable efforts by Mr. Hines resulted in four tranches of documents numbering 340 pages, 109 pages, 88 pages, and 1 page, respectively.⁷ (Ex. I, pg. 90; Ex. N, pg. 109; Ex. Z, pg. 157-158).

⁵ Mr. Hines’s search included these employees’ personal devices. (Ex. F, pg. 78; Ex. H, pg. 86).

⁶ Samantha Sunne is the only other member of the Brechner Center besides Dr. Cuillier and Prof. Bambauer. (Ex. X, pg. 147).

⁷ The University has submitted these unredacted files to the Court for an *in camera* inspection.

Undeterred by the facts, Petitioner fixates on a scrivener's error in Exhibit Z, where Barabara Wood, a member of the public records team, explains that a 621-page tranche of documents was incorrectly attributed to Petitioner's request reference number. Mr. Hines testified that, as part of his coordinating the search for records, he learned that Ms. Wood had inadvertently transposed reference numbers and subsequently corrected her mistake. (Ex. Z, pg. 157). Mr. Hines testified:

(22) Can you tell me anything about the identity
(23) of the 621 page stack or the 88 page stack or
(24) anything about what happened to them?

**(25) A Sure. The request that we're discussing
(1) today is W018463, the 621 pages resulted from an IT
(2) search conducted for a different request, W018643.**

Not only did Petitioner elicit this testimony, he failed to present any competent evidence to contradict it. Thus, there is no factual dispute that the 621-page tranche is unrelated to the request at issue.

Petitioner also fixates on a search of Prof. Bambauer's email box. Mr. Hines testified that an indexing error had led him to ask UFIT to re-run a search of Prof. Bambauer's mailbox. (TR. 113:22-117:8; Ex. N, pg. 109-110).⁸ According to Mr. Hines, that follow-up search corrected the issue: "the search was now done correctly with the additional pages." (TR. 117:7-8; Ex. Ex. N, pg. 109). Though Petitioner sees this as evidence of a conspiracy, he failed to offer anything to contradict Mr. Hines's credible testimony or the corroborating evidence in the record.

Mr. Hines testified that records responsive to Petitioner's request were delivered to Petitioner on May 4, 2026, without redactions and with no documents withheld. (TR. 121:3-121:19; TR. 127:23-128:1; Ex. B). Mr. Hines testified that his goal in working with UFIT was to

⁸ This 109 page tranche of records, containing 17 emails, is the same one submitted to Court for its *in camera* inspection.

“make sure the searches were done properly.” (TR. 120:7-9). He testified that after Petitioner complained about the May 4 production, he double checked all the searches “[t]o make sure everything was done the proper way.” (TR. 123:24-124:10). Mr. Hines testified that he handled Petitioner’s request in good faith. (TR. 125:9-126:8). Lastly, Mr. Hines testified that he did not know who Petitioner was before his request, and that there is no conspiracy to deny Petitioner records. (TR. 127:13-22).

Legal Argument

Throughout this case, and again at the Hearing, Petitioner has sought to put the University’s search process on trial, thereby shifting the burden to the University. Petitioner’s argument, which is contrary to Florida precedent, would have the Court micromanage the University’s search process and then force the University to prove a negative—that there are no additional records responsive to Petitioner’s request in the University’s possession. *Cf. Town of Manalapan v. Rechler*, 674 So. 2d 789, 790–91 (Fla. 4th DCA 1996) (finding that mandamus is a “one time order by the court” and that continued oversight by the Court of an agency’s search process is an improper remedy). This approach turns the Chapter 119 mandamus inquiry on its head, because Chapter 119 requires nothing more or less than a reasonable, good faith effort to locate records that are responsive to the single request at issue. *See id.*; *see also* § 119.07(c), Fla. Stat.

Accordingly, the specific request made by Petitioner defines the issue before the Court. See § 119.11(1)(b). Stated differently, the Court’s determination of the University’s Chapter 119 compliance is confined to the terms of Petitioner’s request. If that were not the case, then the University would have no notice of the claims against it before Petitioner filed suit. He cannot claim non-compliance for records he never requested. This is a critical point, as Petitioner is fixated on documents that the University found using his search criteria but were not responsive to his

Mr. Hines then responded by seeking clarification from Petitioner. (TR. 123:13-17; Ex. AA, pg. 165). Since Petitioner had originally asked *only* for documents “*related to myself*,” the University asked him:

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?
(Ex. AA, pg. 165; See TR. 124:11-23).

Petitioner 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.”

I am not seeking records about unrelated third parties who happen to share my surname.
(Ex. D, pg. 69 (emphasis added); See TR. 124:11-23).

This response from Petitioner is the most consequential admission in this case. It shows that when the University delivered only the records that were related to Petitioner, it fully satisfied its obligations under Chapter 119. Why? Because records *related to Petitioner* were the *only* records Petitioner sought. (TR. 124:24-125:8). The evidence from the Hearing showed that Petitioner’s own emails were the *only* University records *related to Petitioner*. (TR 31:4-21; TR. 40:4-22; TR. 75:15-24; TR. 76:6-13). Because Petitioner received exactly what he asked for, the University *ipso facto* complied with Chapter 119. Consequently, there is no basis in law or fact to support Petitioner’s claim.

Petitioner’s rejection of these unrelated documents, prior to filing suit, also shows that Petitioner’s entire lawsuit is founded on an improper purpose. His argument, convoluted as it is, rests on the notion that the University should have sent him non-responsive records so that *he*

could review them. Petitioner thinks he should be the one to decide which records are “related” to him, even going so far as to challenge the University’s authority to discern which records are responsive: “If the University believes such authority exists, please identify the specific statutory basis in writing.” (Ex. D, pg. 69). Such authority is well established.

In the case of *City of St. Petersburg v. Dorchester Holdings, LLC*, 331 So. 3d 799 (Fla. 2d DCA 2021), the Second DCA considered a dispute in which a requestor sought records related to a property development project. The court held, unequivocally, that “the Public Records Act requires a records custodian to determine whether the requested records exist, locate the records, and review each record to determine if any of those records are exempt from production.” *Id.* at 806 (emphasis in the original). Thus, Petitioner’s contention that the University has no right to exercise its judgment in determining the existence of responsive records is wrong as a matter of law. Rather, the University had no choice but to exercise its subjective discretion. *Id.*

When the University determined which records were responsive, as required by Chapter 119, it simultaneously determined which records were not responsive. It reviewed all the *responsive* records, as required by law, and found no exempt material. This negates Petitioner’s remaining arguments that the University failed to assert exemptions as required by Chapter 119. The University did not assert exemptions because the records responsive to Petitioner’s request did not contain any exempt material. No further analysis is necessary.

At the conclusion of the Hearing, the Court directed the University to produce all the documents from its search results for an *in camera* inspection within five days. (TR. 134:14-21). the University complied the next day and delivered the applicable files via email. This tranche of

records, intended for the Court's eyes only, were unredacted and included redundancies omitted from the University's prior submission that accompanied its *Motion for Protective Order*.¹⁰

Petitioner baselessly asserts that the documents submitted for *in camera* review are the same documents he requested. Petitioner is either lying, mistaken, or incapable of reasoned thought. He expressly disclaimed records unrelated to himself, and now asks the Court to punish the University for complying with that disclaimer. As the Court will observe during its *in camera* review, the records *related* to Petitioner are the same records *delivered* to Petitioner.

Suspicion and paranoia permeate everything Petitioner writes or says. When the University witnesses offer un rebutted testimony, he assumes that they are lying. When the University emails discuss documents, he assumes that something is being hidden. This is wrong. Petitioner's cynicism is informed by conspiratorial delusions. In approaching the facts from this warped mindset, Petitioner invites the Court to assume in the first instance that the University is acting in bad faith. But this goes against Florida law, because Petitioner bears the burden to show that the University did not act in good faith. *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) (holding plaintiff bears the burden to show noncompliance).

In other contexts, Florida courts presume that government workers execute their jobs in accordance with the law. *See Hillsborough Cnty. Aviation Auth. v. Taller & Cooper, Inc.*, 245 So. 2d 100, 102 (Fla. 2d DCA 1971) ("In Florida there is a presumption that public officials properly perform their duties in accordance with the law and it is incumbent upon those challenging such

¹⁰ After Petitioner propound lengthy and abusive discovery, UF successfully moved for a protective order. In so doing, UF submitted to the Court all the records it located in response to Petitioner's request, including non-responsive records, to assist the Court in resolving the threshold issue of whether the University produced the public records requested by Petitioner. Those non-responsive records did contain exempt material, as asserted in UF's *Motion for Protective Order*, and UF redacted them before filing. (TR. 126:24-127:6).

performance to overcome the presumption”). Section 119.12, Fla. Stat., places the agency’s good faith directly at issue, so this presumption does not directly apply to the instant case.

Nonetheless, Florida’s Chapter 119 jurisprudence places the burden of showing non-compliance, and the absence of good faith, on the Petitioner. Thus, the premise from the outset must be that the University complied with Chapter 119 in good faith unless shown otherwise by a preponderance of the evidence. “This duty, unlike the strict legal duties imposed by the law, is subjective. Whether a governmental entity acted in ‘good faith’ in the manner in which it responded to a request for disclosure of public records is necessarily a question for the court to decide based on the circumstances of a case.” *Consumer Rights, LLC v. Union Cnty., Fla.*, 159 So. 3d 882, 885 (Fla. 1st DCA 2015).

Here, the circumstances of the case show that the University went above and beyond its obligations under Chapter 119. After a thorough investigation, it produced the only responsive records that existed related to Petitioner. Then when he complained, the University went back and searched again just to make sure, but no more responsive records turned up. This evidence is un rebutted, and the Petition must be denied.

Improper Purpose

Pursuant to § 119.12(3), Fla. Stat., the court “shall determine whether the complainant requested to inspect or copy a public record or participated in the civil action for an improper purpose.” The statute goes on to explain the meaning of improper purpose: “to participate in the civil action primarily to cause a violation of this chapter or for a frivolous purpose.” Both of these descriptors apply to Petitioner. Here, Petitioner has engaged in the following improper and frivolous conduct:

- Failed to even allege (much less prove) any ultimate fact justifying his Petition. Petitioner has never produced a scintilla of evidence to suggest the University withheld responsive records. He has never identified with specificity a single document responsive to his request that he did not receive. His entire basis for this lawsuit is his belief in a conspiracy theory.
- Filed over 1700 pages in pleadings, motions, and exhibits without clear purpose in what is a simple case. Petitioner is using the Chapter 119 mandamus process to expand and complicate this case at every opportunity, and, with every bloated filing, he demands attorney’s fees. In other words, Petitioner’s goal is not to obtain the records he requested (he already has them), but to create controversy and extract exorbitant fees from the University.
- Insisted on unwarranted and abusive discovery, and, after the Court announced its protective order, continually violated that order by demanding more documents and interrogating the University via email.
- Published attacks against witnesses before they testified. As revealed during the Hearing, Petitioner wrote to multiple media outlets impugning the integrity of Dr. Cuillier. In this email, Petitioner posed the following rhetorical question to the University:

(21) ...is it [UF’s] plan to simply cover
 (22) this up, and keep Dr. Cuillier in his position like
 (23) he's a good faith advocate for Freedom of
 (24) Information? It's hard to imagine worse hypocrisy?

(25) A Yeah, I think I saw that in there.

(TR. 63:21-25).

“[T]here is nothing more sacred than judicial proceedings that are free from attempts to tamper with or intimidate witnesses.” *Special v. W. Boca Med. Ctr.*, 160 So. 3d 1251, 1262 (Fla. 2014).

“Indeed, without a judicial proceeding free of intimidation and threats, there is no reason for the fact-finding process.” *Id.* This attack on a witness must be considered improper.

And, as quoted in the beginning of this brief, Petitioner threatened the Court by stating that “Someone needs to attack you.” (TR. 57:7).¹¹ This reprehensible behavior is grounds for direct contempt: “A direct contempt is an insult committed in the presence of the court or of a judge when acting as such[.]” *Kress v. State*, 790 So. 2d 1207, 1208 (Fla. 2d DCA 2001) (citation omitted). This conduct is also likely a violation of professional conduct. *See, e.g., The Florida Bar v. Morgan*, 938 So. 2d 496, 499 (Fla. 2006) (upholding a 91-day suspension for an attorney who, among other things, called the presiding judge obnoxious). The Court must find this conduct improper.

The Court’s determination of Petitioner’s improper purpose is mandatory. *See* § 119.12(3). Moreover, “if the court determines there was an improper purpose, the court may not assess and award the reasonable costs of enforcement, including reasonable attorney fees, to the complainant[.]” *Id.*¹² Furthermore, the Court “shall assess and award against the complainant and to the agency the reasonable costs, including reasonable attorney fees, incurred by the agency in responding to the civil action.” *Id.*

The cumulative effect of these actions more than suffices as evidence of Petitioner’s improper purpose. Petitioner has tried, with no factual support, to manufacture a violation of Chapter 119 to extract fees from the University. Worse, Petitioner has frivolously used this proceeding to pontificate on, ruminate over, and promote his deranged conspiracy theories at the expense of judicial economy, judicial integrity, and the resources of the University. He has brazenly tried to intimidate witnesses and openly insulted the presiding judge. Based on these actions, the University respectfully requests that the Court deny Petitioner any attorney’s fees and assess Petitioner the University’s reasonable costs, including reasonable attorney fees, incurred by the

¹¹ These insults do not include personal attacks against Judge Keim made during the August 24, 2026, hearing.

¹² Fees are not appropriate in this case, in any event, because UF complied with Chapter 119.