

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**JOHN WILLIAM LICCIONE,**  
*Plaintiff,*

**Case No.: 1:25-cv-01028**

**v.**

**DONALD J. TRUMP**, in his individual capacity;  
**VLADIMIR VLADIMIROVICH PUTIN**, in his personal capacity and as  
President of the Russian Federation,  
**PAMEMLA JO BONDI**, individually and in her official capacity as Attorney  
General of the United States;  
**HARMEET KAUR DHILLON**, individually and in her official capacity as  
Assistant Attorney General for the DOJ Civil Rights Division;  
**JEANINE PIRRO**, individually and in her official capacity as U.S. Attorney for  
the District of Columbia;  
**EDWARD MARTIN**, individually and in his former official capacity as Acting  
U.S. Attorney for the District of Columbia;  
**ANDREW DARLINGTON**, individually and in his official capacity as Acting  
Chief of the Special Litigation Section of the DOJ Civil Rights Division and his  
previous capacity as Chief of the Florida Office of Election Crimes and Security;  
**KASHYAP PRAMOD PATEL**, individually and in his capacity as FBI Director;  
**RONALD DION DESANTIS**, individually and in his official capacity as  
Governor of Florida;  
**BRUCE BARTLETT**, individually and in his official capacity as State Attorney  
for the Sixth Judicial Circuit of Florida;  
**CORD BYRD**, individually and in his official capacity as FL Secretary of State;  
**MARIA MATTHEWS**, individually and in her official capacity as Director of the  
Florida Division of Elections;  
**JULIE MARCUS**, individually and in her official capacity as Pinellas County  
Supervisor of Elections;  
**VR SYSTEMS, INC.**;  
**MINDY PERKINS**, individually and in her corporate capacity as CEO of VR  
Systems,  
*Defendants.*

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Clerk, U.S. District & Bankruptcy  
Court for the District of Columbia

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## **FIRST AMENDED COMPLAINT**

### **I. INTRODUCTION**

1. Plaintiff John Liccione, Pro se, brings this action under the Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. §§ 1961–1968), the Anti-Terrorism Act (18 U.S.C. § 2333), civil rights statutes (42 U.S.C. §§ 1983, 1985, and Bivens), wire and mail fraud statutes including honest services fraud (18 U.S.C. §§ 1341, 1343, 1346), unlawful electronic surveillance (18 U.S.C. § 2520), the Computer Fraud and Abuse Act (18 U.S.C. § 1030), obstruction of justice and witness tampering statutes (18 U.S.C. §§ 1503, 1512), and related common law torts.

2. Plaintiff alleges the above-named Defendants engaged in a coordinated scheme of racketeering, constitutional violations, international terrorism and contract murder for hire, witness tampering through bribery, unlawful electronic surveillance, wire fraud, mail fraud, and other related torts carried out to: (a) suppress Plaintiff's discovery and disclosure of systemic defects in Florida's vote-by-mail (VBM) election software and the cover-up thereof; (b) obstruct Plaintiff's civil and criminal complaints in state and federal courts and law enforcement agencies; (c) protect the personal political interests of Donald J. Trump by

concealing election-related misconduct that could result in the overturn of his 2024 election and his subsequent removal from office and imprisonment; (d) conspire with Vladimir Putin and Taliban/Iraqi terrorist operatives to carry out an international assassination plot against Plaintiff on U.S. soil; (e) weaponize the NSA and FBI to hack Plaintiff's devices, either by fraudulently obtained FISA warrants or through warrantless surveillance, in furtherance of the conspiracy; and (f) target Plaintiff's property — including explicit threats murder his cat, Rigatoni, by name — in an effort to terrorize, silence, and retaliate against him.

3. Plaintiff alleges that this conduct is treasonous in nature within the meaning of Article III, Section 3 of the U.S. Constitution. Treason is a criminal offense and is not pled here as a standalone civil cause of action. Rather, the same facts are alleged as predicate acts supporting civil RICO, as elements of civil conspiracy, and as acts of international terrorism actionable under the Anti-Terrorism Act, and as torts under common law.

4. On U.S. soil, these offenses were and are being directed by Donald J. Trump in his personal capacity and are being executed through Attorney General Pam Bondi and her subordinates Harmeet Dhillon, Jeanine Pirro, Edward Martin, Kash Patel, and Andrew Darlington. Acting at Trump's direction, this federal tier of the RICO enterprise is mirrored at the state level by Governor Ron DeSantis, who directed Secretary of State Cord Byrd and Elections Director Maria Matthews to

continue publishing knowingly falsified vote-by-mail reports and directed the county Supervisors of Elections to do so as well; by State Attorney Bruce Bartlett, who ordered his investigators to deliver a scripted “no crime here” message while directing his subordinates to lie to Plaintiff, and by Pinellas County Supervisors of Election Julie Marcus (and other county SOEs), who managed the county-level publication of the fake VBM reports.

5. At the corporate core, VR Systems, Inc. the elections systems company used by Florida, Georgia, North Carolina, and other states, and its CEO Mindy Perkins, developed, deployed, and maintained the statewide election software platform hosted in Amazon Web Services data center in Ashburn Virginia that contained a concealed known defect — referred to herein as the “*No-No Ballot Bug*” — which flipped valid “ID was provided” flags from “Y” to “N” (ID was not provided) and falsified ballot-request dates in official voter-transaction history records. These Florida executive branch state actors were enabled by a cadre of personally-conflicted judges in the 6<sup>th</sup> Circuit and the appellate courts that looked the other way because they were victims of the same “*No-No Ballot Bug*” as was Plaintiff.

6. Together, Vladimir Putin through Trump through Bondi and her subordinates and the DOJ and the FBI, and NSA, to DeSantis down through state and county officials and into the elections systems contractor, this racketeering enterprise concealed the defect, tampered with witnesses, obstructed justice,

hacked Plaintiff's devices, and retaliated against Plaintiff to protect Trump's personal political interests in preventing exposure of the potential illegitimacy of his VR Systems-enabled 2016 victory and, more importantly, his VR Systems-enabled 2024 election victories in Florida, Georgia, and North Carolina, which might otherwise be overturned and in doing so, overturn his electoral college victory and subject him to removal from office and imprisonment for his felony convictions in the State of New York.

## **II. THE PARTIES**

7. **John William Liccione**, Plaintiff, pro se, is a 65 year old American citizen, a Florida registered voter, and a USAF/NSA veteran intelligence analyst, semi-retired cyber-security executive, and independent publisher and investigative reporter. He was a 2024 Democratic Congressional candidate in Florida's 13<sup>th</sup> District and was a candidate for Mayor of Gulfport Florida in March of 2025. He is currently exploring running for Senator of Florida against Ashley Moody in 2026 and/or for President in 2028.

8. **Defendant Donald J. Trump** is sued in his personal capacity for wrongful acts undertaken outside lawful official duties to protect his political, personal, and financial interests.

9. **Defendant Vladimir Vladimirovich Putin**, President of the Russian federation, is sued in his personal and official capacities.
10. **Defendant James David Vance**, Vice President of the United States, is sued in his personal and official capacities.
11. **Defendant Pamela Jo Bondi**, Attorney General, is sued in her personal and official capacities.
12. **Defendant Harmeet Dhillon**, Assistant Attorney General for the DOJ Civil Rights Division, is sued in her personal and official capacities.
13. **Defendant Jeanine Pirro**, U.S. Attorney for the District of Columbia, is sued in her personal and official capacities.
14. **Defendant Edward Martin**, former Acting U.S. Attorney for the District of Columbia, is sued in his personal capacity.
15. **Defendant Andrew Darlington**, DOJ Civil Rights Division official and former Florida Chief of Election Crimes and Security, is sued in his personal and official capacities.
16. **Defendant Kashyap Pramod Patel**, FBI Director, is sued individually and in his official capacity.
17. **Defendant Ron DeSantis**, Governor of Florida, is sued in his personal and official capacities.

18. **Defendant Cord Byrd**, Florida Secretary of State, is sued in his personal and official capacities.

19. **Defendant Maria Matthews**, Director of the Florida Division of Elections, is sued in her personal and official capacities.

20. **Defendant Julie Marcus**, Pinellas County Supervisor of Elections, is sued in her personal and official capacities.

21. **Defendant Bruce Bartlett**, State Attorney for the Sixth Judicial Circuit, is sued in his personal and official capacities.

22. **Defendant VR Systems, Inc.**, a Florida corporation providing election cloud computing software and services, is sued in its corporate capacity.

23. **Defendant Mindy Perkins, CEO of VR Systems**, is sued in her personal and corporate officer capacities.

### **III. JURISDICTION AND VENUE**

24. This Court has jurisdiction under 28 U.S.C. § 1331 (RICO, ATA, CFAA, § 2520, Bivens) and supplemental jurisdiction under 28 U.S.C. § 1367, and venue is proper under 28 U.S.C. § 1391.

25. This Court has federal question jurisdiction under 28 U.S.C. § 1331 because Plaintiff asserts claims under the Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. § 1962), the Anti-Terrorism Act (18 U.S.C. § 2333), the Computer

Fraud and Abuse Act (18 U.S.C. § 1030), and the federal wiretap statute (18 U.S.C. § 2520); all the federal defendants work and/or live in this District; and he seeks relief for violations of the U.S. Constitution pursuant to *Bivens*.

26. This Court has supplemental jurisdiction over related Florida state-law claims under 28 U.S.C. § 1367.

27. Venue is proper in this District under 28 U.S.C. § 1391 because a substantial part of the events or omissions giving rise to these claims occurred in this District; multiple Defendants reside or are employed here; and the conspiracy's effects were purposefully directed from here.

#### **IV. STATEMENT OF FACTS**

28. On June 23, 2022, Florida enacted the current version of Rule 1S-2.043 (**Exhibit A**), which incorporated Form DS-DE 145 (**Exhibit B**) and established the uniform file format, content, and transmission requirements for all vote-by-mail ("VBM") daily reports statewide. From that date forward, each Supervisor of Elections was required to transmit a daily electronic VBM snapshot report to the Division of Elections, including weekends and holidays, no later than 8:00 a.m. the following day. For presidential preference primaries, primaries, general elections, and special elections, this duty begins sixty (60) days before the election and continues until the fifteenth (15th) day after the election. By statute, this creates

seventy-five required daily reports per election cycle, and each daily report functions as a complete snapshot of all ballot requests and statuses as of the day before, and each must be made available to candidates and authorized political parties.

29. Based on Plaintiff's personal knowledge and experience, the concealed No-No Ballot Bug was corrupting official VBM records in Plaintiff's own August 20, 2024 congressional primary race and his March 11, 2025 Gulfport mayoral/municipal election, and in the April 1, 2025 special election.

30. In the case of Plaintiff's mayoral election, the falsified daily reports were provided directly to Plaintiff by the Pinellas Supervisor of Elections through the county portal, because the election was municipal rather than statewide. Plaintiff also continued to track the April 1, 2025 special elections, which likewise showed significant numbers of what are referred to herein as "No-No Ballot" requests in records provided directly to Plaintiff by a Republican Party official and election integrity watcher in Palm Beach County.

31. Although Plaintiff has personal knowledge of data corruption in elections beginning in 2024, it is a reasonable inference—based on information and belief—that the software defect causing the corruption has been present and affecting every Florida election since August 2022. This is because the June 2022 version of Rule 1S-2.043 would have logically required VR Systems to update its software

statewide to incorporate the latest DS-DE 145 reporting fields, and the “*No-No Ballot Bug*” would reasonably have been embedded in that software version and build and all subsequent versions and builds. Thus, unless and until patched, every daily VBM snapshot report published under Rule 1S-2.043 since the August 2022 primary election has been subject to corrupted in the same manner for any county which used the software feature referred to in the VR Systems user manuals as “election cloning.”

32. Rule 1S-2.043(c)(5) (**Exhibit A**) expressly mandates that each data element be provided as specified in DS-DE 145 (**Exhibit B**). That form defines thirty-eight (38) discrete data fields, including the three most relevant to this case: (a) **Request Date** (MM/DD/YYYY); (b) **Voter FLDL/StateID** (*Y = information was provided; N = information was not provided*); and (c) **VoterSSN4** (*Y = information was provided; N = information was not provided*). These fields are central to HAVA compliance because they reflect whether a voter submitted required identifying information, and whether election officials correctly recorded it, validated it, and preserved the records accurately for auditing purposes.

33. Federal and state law impose strict duties of accuracy in these records. Section 97.012, Florida Statutes, and HAVA (52 U.S.C. §§ 21081–21085) require that voter registration systems be accurate, complete, and verifiable. By incorporating DS-DE 145, Rule 1S-2.043 establishes the legal standards under

which every candidate, political party, and interested citizen must be able to rely upon the accuracy of daily published snapshot VBM reports by the State and counties.

34. In 2024 and 2025, however, the VBM reports published by the Florida Division of Elections (FDOE) and the Pinellas County Supervisor of Elections (PCSOE) contained knowingly fake data in these three critical fields. Specifically, ID-provided flags (“Y”) were flipped to ID-not-provided flags (“N”), and genuine ballot request dates were overwritten with fake dates. This falsification was the direct result of a concealed systemic defect in VR Systems’ software, referred to herein as the “*No-No Ballot Bug*.”

35. The publication of these fake reports violated Rule 1S-2.043 and DS-DE 145, corrupted the integrity of official voter mail ballot request transaction histories. The on-going publication of these fake reports, after have been notified of the No-No Ballot request anomalies in August of 2024 by Plaintiff and others, deprived Plaintiff—as a candidate and litigant—of truthful election records, causing him damages. These falsifications, and the cover-up thereof by defendants and their enabling attorneys and several Florida judges, form the foundation of the fraudulent scheme lying at the heart of this case, and fueled every downstream wrongful act by the Defendants since Plaintiff filed his Tampa federal lawsuit in August 2024, and the instant DC lawsuit in April of 2025.

36. Each one of these seventy-five daily snapshot reports is a separate statutory obligation. And when published knowing they contained false information, is a separate act of wire fraud. Defendants' publication of falsified VBM reports therefore multiplied across the state. In a single election cycle, each of Florida's sixty-four counties (that use VR Systems) was required to generate 75 daily snapshot reports, creating thousands of separate knowingly false transmissions. Each falsified report constitutes a distinct interstate and intrastate wire communication, and in some cases a separate mailing of DVDs, actionable as mail fraud.

37. In Plaintiff's own March 11, 2025 Gulfport mayoral election specifically, in which Plaintiff's own VBM ballot request history records were falsified 38 times, the Pinellas Supervisor of Elections ("PSOE") published only thirty-eight (38) daily snapshot reports to Plaintiff through the county portal, ceasing the day before the election and omitted the required weekend and holiday reports. This conduct compounded two distinct violations of Rule 1S-2.043: (a) publishing 38 daily snapshot reports containing knowingly false election records, and (b) failing to provide the full statutory number of daily reports during the election cycle.

## **The June 23, 2024 Pinellas Ballot Request Massive Spike and Statewide**

### **Anomalies**

38. On June 24, 2024, the Florida Division of Elections (“DOE”) published its first daily statewide VBM ballot-request report to candidates and campaigns. That report showed a massive spike of more than 219,000 No No Ballot request entries in Pinellas County, 99 percent of which had their Request Date field showing **June 23, 2024**, a Sunday. In each case, assuming the underlying voter records contained valid identifying information (which should have been reflected as “Y” for ID was provided), the published report instead displayed “N” (ID was not provided). This combination of falsified request dates and false ID-not-provided flags was the direct result of what turned out to be a concealed VR Systems software bug.

39. On June 27, 2024, the statewide VBM reports reflecting a similar massive spike anomaly in Miami-Dade County, with more than 186,000 No-No Ballot request entries. In this case, the Request Date field for each affected record was shown as **June 26, 2024**, with the ID flags showing as “N/N” in the published reports.

## **The September 9, 2024 General Election Pinellas Ballot Request Spike**

### **Anomaly**

40. On September 10, 2024, during the 2024 general election cycle, the Pinellas County VBM reports began showing another massive ballot request spike—more

than 196,000 No-No Ballot request entries—each with its Request Date field showing **September 9, 2024**. As with the prior spikes, the affected records displayed “N” and “N” (ID was not provided) in the two ID fields.

**The Pinellas County Municipal Election –March 11, 2025**

41. While Plaintiff did not order a mail ballot in the 2024 primary or general elections, he did order a VBM ballot for his March 2025 Gulfport mayoral election. It was Plaintiff’s own VBM record—and the proof that his personal VBM record was falsified—that ultimately caused the Pinellas County Attorney Andrew Keefe to break ranks and admit that the problem was a “known VR Systems’ issue” requiring a software “patch.”

42. In that election, the Pinellas Supervisor of Elections (“PSOE”) published only thirty-eight (38) daily snapshot reports to Plaintiff through the county portal, ceasing the day before the election and omitting the required weekend and holiday reports. Each of those 38 reports contained over 2200 false voter VBM ballot request transaction histories. Plaintiff’s own record was altered to show a false Request Date of January 11, 2025, which first appeared in the January 12, 2025 report, instead of his actual ballot request date of January 8, 2025. The report also falsely displayed “N” in both the SSN4 and FLDL/StateID fields despite valid ID information having been provided by Plaintiff. The same January 11, 2025 false Request Date and false “N/N” ID-not-provided flags were assigned to over 400

Gulfport voters, whose records appeared alongside Plaintiff's in the reports. This conduct compounded two distinct violations of Rule 1S-2.043: (a) publishing knowingly false daily snapshot reports that replaced accurate ballot request dates and ID-provided flags with false information, and (b) failing to provide the full statutory number of daily reports during the election cycle by not publish daily reports on weekends and holidays.

**Plaintiff's Political Activity and Public Opposition to Trump and Putin**

**(2022–2023)**

43. In 2022, Plaintiff founded RussiLeaks USA, LLC, a Delaware limited liability company and on-line media platform dedicated to flipping the script on Putin and exposing Russian influence operations and their connections to Donald Trump and other agents acting on Putin's behalf on US soil. Through this media outlet, Plaintiff published the "*Grand Unifying Theory of Putin and Trump*" with subtitle: "*Pay no attention to the white Russian behind the curtain - Vladimir Putin's Fascist, Race-baiting, Wizard of Oz Strategy to Take Down America Without Firing a Shot.*" It was an essay and plan of action that directly accused Trump of acting as Vladimir Putin's agent and outlined the mechanisms of Russia's hybrid warfare against the United States, and how America must counter and defeat it before it was too late.

44. Plaintiff's writings and activism established him as a vocal opponent of both Putin and Trump. In August 2022, Plaintiff delivered his fiery "*Putin is a Ped*" speech into the security cameras at the gates of the Russian Embassy in Washington, D.C., denouncing Putin as a "pedophile president" and calling for the Russian people and generals to overthrow him - or defect.

45. By publishing RussiLeaks, and publicly attacking Putin and Trump, Plaintiff directly threatened the information warfare and disinformation campaigns both men depended upon to gain and remain in power. These activities made Plaintiff the personal enemy not only of Putin, but also of Trump and his domestic political apparatus, which included attorneys, political operatives, and state officials aligned with him in Florida such as Ron DeSantis and his underlings, and Congresswoman Anna Paulina Luna in Florida's District 13.

46. Following the launch of RussiLeaks in 2022, Plaintiff continued throughout 2022 and early 2023 to publish articles, analyses, and media content directly challenging Vladimir Putin, his invasion of Ukraine, and Donald Trump's alignment with them. He moved from Washington DC to Gulfport Florida in CD-13 in January of 2023.

47. Through RussiLeaks, Plaintiff consistently exposed connections between Russian hybrid warfare tactics, the war in Ukraine, and Putin's efforts to

compromise Republicans in the US Congress to vote against continuing military aid to Ukraine during the Biden term.

48. These activities expanded Plaintiff's public profile as a critic and opponent of both Putin and Trump. Plaintiff's work framed Trump not merely as a corrupt politician, but as an integral part of a larger corrupt international RICO enterprise led by Vladimir Putin, thereby marking Plaintiff a direct threat to Trump's efforts to legitimize his 2016 victory, to delegitimize his 2020 election loss, and a threat to him in the 2024 election and thereafter.

49. By the end of 2022, Plaintiff's writings, media projects, musical performances, and public advocacy had established him as both a political activist and a whistleblower figure in Florida, in Ukraine, and within certain circles within the US and NATO intelligence communities. In exposing the interplay between Russian operations here and in Ukraine, and Trump's electoral strategy, Plaintiff publicly positioned himself as an adversary to the same individuals and organizations later identified as part of the RICO enterprise alleged in this case.

50. In February 9, 2023, one month after Plaintiff moved to Gulfport, Congressman Matt Gaetz of Florida introduced House Resolution H.Res. 113: ***Ukraine Fatigue Resolution***, calling for the immediate termination of all US aid to Ukraine. One of Matt Gaetz' ten co-sponsors on the resolution was Plaintiff's own Representative: Republican Anna Paulina Luna.

51. Realizing his own Representative was quacking Putin’s Ukraine agenda into the US Congress, Plaintiff commissioned a piece of caricature art by a Ukrainian soldier, drone operator and artist Max Murashko, entitled: “***Putin-Puppets Gone Wild***”. Subtitled: *Congresswoman Anna Paulina Luna Supports Assault Rifles – Just not for Ukraine, While “Bearing Arms...and Midriff.”*

52. The piece featured caricatures of Anna Paulina Luna, Matt Gaetz, Marjorie Taylor Greene, and Lauren Boebert dangling as puppets with a giant Putin as the puppet looming over the US Capitol. Matt Gaetz was depicted in a speedo with “Putin” tattooed across his belly. Marjorie Taylor Green had her hallmark white mink stole across her shoulders, Lauren Boebert was dressed in “Daisy Duke” cutoff shorts wielding an AR-15, and Anna Paulina Luna had “Putin” stitched across her behind and was holding a toy duck (quacking Putin’s Ukraine agenda into the US Congress). He published an article on RussiLeaks featuring this art entitled “*Putin-Puppets Gone Wild* on May 19, 2023.<sup>1</sup> This particular takedown of these MAGA Representatives, all of whom had signed Gaetz’ Ukraine Fatigue Resolution, would be referenced later in a warning Plaintiff would receive that he was on Trump’s target list for deportation, arrest, or worse.

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<sup>1</sup> *Putin-Puppets Gone Wild*, John Liccione, Russileaks, May 19, 2023; <https://russileaks.com/2023/05/putin-puppets-gone-wild/>

53. That was when Plaintiff decided to run to run against Anna Paulina Luna, and one week later, he filed to run for Congress seeking to unseat Anna Paulina Luna, who, since then, always votes NO on providing military assistance to Ukraine, while constantly bad-mouthing Ukrainian President Volodymyr Zelenskyy. This decision positioned Plaintiff to participate in Florida's 2024 electoral system for the very first time as a congressional candidate.

54. Throughout the rest of 2023 and into mid-2024, Plaintiff actively campaigned in what was a 5-way contested Democratic congressional primary. He would spend over \$250,000 in his life savings self-funding his campaign.

**First Awareness of Key Indicators of Massive Mail Ballot Fraud – a  
Bipartisan Effort**

55. On August 20, 2024—the day of the primary election—Christopher Gleason, a Republican candidate challenging Defendant Julie Marcus for Pinellas County Supervisor of Elections, informed Plaintiff of the existence of the statewide VBM reports, and provided Plaintiff with copies of the VBM report files he had obtained directly from the Florida Division of Elections (FDOE) portal using his own authorized account.

56. Shortly thereafter, Plaintiff received additional statewide VBM files from John Siamas, a Republican candidate for Florida Senate in District 21, who likewise accessed and downloaded the reports through his own authorized FDOE

portal account. They also received DVDs with the reports from the FDOE in the US Mail.

57. The files furnished by Gleason and Siamas were Plaintiff's first exposure to the VBM report data. They showed the Pinellas County spike in which the Request Date field for more than 219,000 entries was Sunday, **June 23, 2024**, and the Miami-Dade spike in which the Request Date field for more than 186,000 entries was shown as **June 26, 2024**. In both instances, the reports displayed "N" (information was not provided) in the SSN4 and FLDL/StateID fields in those voter records.

58. Thus, Plaintiff, a Democratic candidate, on primary election day had just been alerted by two Republican candidates—through files obtained they obtained from the Florida Division of Elections, that the Florida Division of Elections had published statewide VBM reports showing a massive spike of mail ballot requests in Pinellas County on a single Sunday: June 23, 2024, requests in which the reports indicated no voter ID information had *ever* been provided – *because that's what the State's reports said had happened*.

59. Plaintiff lost the Democratic congressional primary for Florida's 13th District, receiving only 4 percent of the vote, believing, based on the VBM reports he believed were accurate, that massive ballot fraud caused his defeat. This was because he had relied on the state VBM report as being TRUE, when in hindsight,

it is crystal clear that they were FALSE – and that the state and county defendants and VR Systems *knew* they were false yet kept publishing and republishing more false reports anyway in the next 3 elections.

60. On August 23, 2024: Plaintiff filed a federal election fraud lawsuit in the Middle District of Florida (Case No. 8:24-cv-02005), alleging massive VBM ballot fraud based on the State’s published reports. (Note: This case was dismissed on August 20, 2025 after a full year of what was wastage litigation.)

61. On September 3, 2024: Plaintiff filed a state election fraud lawsuit in Florida’s 6th Circuit Court (*Liccione v. Marcus, et al.*, Case No. 24-003939-CI), challenging the VBM system, in order to preserve his right to challenge the election results within 10 days after certification under FL law.

62. In September, 2024, in the lead up to the general election, the State’s VBM/Early Voting reports repeatedly showed a third massive spike of over 196,000 “No-No Ballot” requests, all supposedly requested on **September 9<sup>th</sup>**, and again, with ID-provided fields showing as N’s. This was the third foundational spike.

63. On November 14, 2024: Plaintiff received the following anonymous threat/warning email:

**Subject:** Lists

**From:** gonegetgaetz <gonegetgaetz@proton.me>

**To:** “jliccione@gmail.com” jliccione@gmail.com

**Date:** Thu, Nov 14, 2024 at 12:12 PM

For reasons which will become apparent, I need to stay anonymous. It has come to my attention that ***you are on lists which will be used by the incoming administration.*** You should not be surprised, given your activities and posting history. ***Remember your Gaetz/Boebert/Luna posting? It was noted.*** Remember your Putin posts? Remember your ***video at the Russian embassy?*** All of that was noted. It is unclear what exactly these lists will be used for, but it can't be good. ***I suspect it will be for arrest or detainment. Perhaps expulsion. Perhaps worse.*** If you have the ability, you need to leave. There is a movement to ***expat to Mexico City*** and regroup there. Consider that. ***I strongly urge you to go silent. No more political posts. No more calling the police. No more political rallies. No more lawsuits. No more political musical performances. If you do these things, you will be found and taken.*** I am sure of this. They are trying to simplify the chess board by removing pieces. You are a piece that is easy to remove and no one will notice, will they? Keep yourself safe by taking action today. These are dark days and darker days are ahead. No one can help you if you won't help yourself first. You won't get any further communications as long as you are in the US. We will find you, should you expatriate. Good luck, Patriot.” (emphasis added)

64. On November 25, 2024, instead of dropping his lawsuits, ceasing political activity, and self-expatriating, Plaintiff filed to run for Mayor of Gulfport.

65. On December 2, 2024: Florida State Senate candidate John Siamas met via a Zoom call (hosted by private Florida attorney KrisAnne Hall) with Defendant Andrew Darlington, describing the June 23, 2024 FL Division of Elections early voting/VBM reports and the No-No Ballot request spike evidence. Darlington, took no action, asked for “the data” as if it were Siamas’ data to provide not the State’s reports, and avoided creating public records by using a private lawyer to host the Zoom call. Siamas would never hear from Darlington again.

66. On December 4, 2024: Plaintiff filed a First Amended Complaint in the Middle District of Florida Tampa case, dropping certain defendants and naming new defendants Ron DeSantis, Cord Byrd, Andrew Darlington, and Mindy Perkins, CEO of VR Systems, and PCSOE General Counsel Matt Smith, alleging the same VBM ballot fraud, still unaware that the reports were all fake due to an concealed VR Systems software defect – *The No No Ballot Bug*.

67. December 18, 2024: Pinellas County Assistant Attorney Andrew Keefe called Plaintiff and told him that the June 23rd Pinellas spike resulted from importing prior-cycle records, suggesting for the first time it was a result of a known systemic issue, not new voter requests without IDs provided. However, since all discovery had been stayed in both the federal and Florida election fraud cases, Plaintiff had no concrete evidence in support of Keefe’s admission, and Plaintiff did not really believe him. He told Keefe that if there was a logical, non-

criminal explanation for the massive spikes and No-No Ballot requests, then he should bring Plaintiff into the PCSOE, provide the explanation and evidence, and Plaintiff would probably dismiss his lawsuit. Keefe and his clients did not provide such an explanation and rebuffed Plaintiff's entreaty.

68. Then on January 8, 2025, Plaintiff ordered his own VBM ballot for the 2025 municipal election. He provided his SSN4 number and Florida driver's license number. He immediately received a confirmation email from VR Systems' (out-of-state) email server (**no-reply@vr-systems.com**) that the request had been accepted and was being processed. The text of the email was as follows:

[noreply@vrsystems.com](mailto:noreply@vrsystems.com)

Wed, Jan 8, 2025 at 8:58 PM

Subject: MAIL BALLOT REQUEST CONFIRMATION

To: jliccione@gmail.com

JOHN LICCIONE,

A vote-by-mail request for the All Elections Request election on All elections through the next General Election for which the voter is eligible to vote was submitted to the elections office for you on 01/08/2025 at 08:58 PM.

Your mail ballot for this election will be sent to the following address:

907 HULL ST S

GULFPORT FL 33707

If this request was made on your behalf by someone else, their information is as follows:

Requested By:

Requester's Specified Relationship to You:

Requester's Address:

Requester's Signature: John W Liccione

If you have any questions or need further assistance, please contact your local elections office for assistance.

69. Between January 13, 2025, and March 10, 2025, in the 57 days leading up to the March 11, 2025 municipal election, the Pinellas County Supervisor of Elections (PCSOE) published to Plaintiff, via their county file-download portal, a total of 38 daily snapshot VBM reports containing thousands of false voter VBM request transaction history records, records the PSOE and the other Defendants knew to be false. PSOE published such reports to the county portal where they were made available to Plaintiff via his file share portal account. The report dates were: January 13, 14, 15, 16, 17, 21, 22, 23, 24, 27, 28, 29, 30, 31; February 3, 4, 5, 6, 7, 10, 11, 12, 13, 14, 18, 19, 20, 21, 24, 25, 26, 27, 28; and March 3, 5, 6, 7, and 10.

70. These reports falsely showed Plaintiff's own ballot request was made on January 11, 2025—a false request date (instead of January 8, 2025). It also showed false ID-not-provided flags ("N/N") in the identification submission fields for VoterSSN4 and VoterFLDL/StateID fields, despite valid ID numbers having been provided, recorded by VR Systems, and confirmed via their email to Plaintiff.

71. Each such publication constituted a separate interstate/intrastate wire communication in a two-hop process: from VR Systems' Amazon Web Services

(AWS) hosted servers in Ashburn, Virginia, to the PCSOE in Florida, and then to Plaintiff via the county portal.

72. Each report, transmitted from VR Systems' Virginia servers to PCSOE and then to Plaintiff, contained over 2,200 falsified records county-wide, including over 400 Gulfport voters with the same fake request date of January 11, 2025 as Plaintiff's.

**The Systemic Non-Response of the Florida/Federal Law Enforcement and Criminal Justice System**

73. On February 25, 2025: Plaintiff filed a sworn criminal complaint (GP25-3378) with the Gulfport Police Department, alleging election fraud in his March 11, 2025 mayoral race and providing the evidence – the County VBM report and his own fraudulent VBM request record.

74. On February 28, 2025: Plaintiff submitted the complaint and a grand-jury probe request letter to State Attorney Bruce Bartlett, including his own falsified record and 410 affected Gulfport voters. No response was received for five weeks.

75. On February 28, 2025, Plaintiff called the FBI to report the fraud: The auto-triage bot hung up after he identified himself –the bot saying he was flagged in the system as a frequent crime reporter.

76. On March 4, 2025, Plaintiff attempted to report the Gulfport fraud to Andrew Darlington, who hung up mid-call while Plaintiff was reading him the Gulfport Police report number, preventing official record creation, and avoiding taking election crime investigatory action, again.

77. On March 5, 2025 (on or about): Plaintiff discovered Gulfport City Council candidate Marlene Mackee Shaw's VBM record was among the over 400 No-No Ballot request records dated January 11, 2025 in Gulfport. He provided her the spreadsheet showing her his own fake VBM record, highlighted her record, explained the potential for identity theft. She confirmed she had submitted her valid ID numbers when she had requested her ballot. Shaw contacted the PCSOE office, who explained to her that the "N/N" ID-not-provided flags "*don't mean what he [Liccione] thinks they mean.*" This partial explanation was willfully withheld from Plaintiff, contributing to his stigmatization as a conspiracy theorist and an election denier within the local Gulfport community at large, and harming his reputation.

78. From March 1<sup>st</sup> to March 10, 2025, Plaintiff's efforts to expose what he still believed was significant mail ballot request fraud, -presenting findings at a Gulfport City Council meeting, emailing city leadership, publishing an expose' on The Crabber News, reporting it to the local Democratic party and Democratic club members, distributing public service announcement flyers, filing his pre-election

challenge and his grand jury probe request with the State Attorney, led to public humiliation. He was labelled a conspiracy theorist, election denier, was banned from the largest Gulfport Facebook group, was mocked as “weird” three times at a charity event at a local Church raising money for the Gulfport Senior Center to the extent he had to leave, and he was shunned in Gulfport, decimating his mayoral campaign and causing emotional distress.

**The Systemic Non-Response of the Pinellas County Canvassing Board**

79. On March 10, 2025: Plaintiff submitted a pre-election challenge to the Pinellas County Canvassing Board, requesting 420 “No-No Ballots” be set aside for voter verification before being counted. The board ignored the challenge and certified the results. They certified the results because they knew their own VBM reports were fake, that all 420 voters had provided valid IDs back when they had requested them, not on January 11, 2025 like their reports showed, but in the prior election cycle and had been imported into the new municipal election on January 11<sup>th</sup> and the accurate data were overwritten because of a software bug. As election officials, they had a fiduciary duty to notify Plaintiff, as a candidate who relied on them, that they were fake. They failed in the duty of care they owed Plaintiff as that candidate.

80. The Chair of the Canvassing Board was 6<sup>th</sup> Circuit Judge Edwin Jagger. Julie Marcus, a Defendant in both of Plaintiff’s active election fraud cases, was

also on the Canvassing Board. The PCSOE General Counsel, Matt Smith, was also a Defendant. No response to his pre-election challenge was ever provided to Plaintiff: Not even a denial, written or verbal. The only call he received was from Gulfport City Clerk Theresa Carrico on the night of March 11<sup>th</sup> officially informing him that Karen Love had been elected Mayor.

81. On March 11, 2025 Plaintiff lost the Gulfport mayoral election, receiving only 149 votes, believing fraud caused his defeat due to a VBM ballot fraud large enough to have changed the outcome of his election. Marlene Shaw, having been given different information from the PCSOE than was given to Plaintiff (which was no verifiable information at all), was elected to Gulfport City Council.

82. On March 13, 2025, however, just two days after Plaintiff's election loss, the attorney for Defendant Julie Marcus in Plaintiff's two election fraud lawsuits, Andrew Keefe, called him again and confirmed explicitly that the (No No Ballot request) issue was a "*known VR Systems issue*" requiring a "*patch*" and that "*it would be proven in discovery – if the case gets to discovery*"

83. Upon hearing the specific words "*known VR Systems issue*" and "*patch*", being a technology executive who has brought several software products to market in his career, these words triggered Plaintiff. He instantly realized that all along, this was a VR Systems software bug that the Florida defendants had known about since no later than August of 2024 when they were sued by Plaintiff, Chris

Gleason, John Siamas, Rocky Rockford, and Neelam Perry for the exact same issue. Plaintiff realized that the VBM reports were FAKE, not true representations of actual voter VBM ballot activity. Plaintiff corroborated this with VR Systems' published user manuals in the sections covering a feature called "election cloning" in VR Systems' software.

84. On March 17, 2025: Plaintiff disclosed the "No-No Ballot Bug" in a court filing in his Tampa election fraud case for the first time, opposing Mindy Perkins' motion to dismiss that had been filed by attorney Benjamin Gibson, who had a conflict of interest due to his appointment to incoming Florida Attorney General James Uthmeier's transition team.

85. On March 22, 2025: Plaintiff filed his first of two DOJ Civil Rights election fraud complaints with the Civil Rights Division (ID 586580-NHV). No response was received.

86. On March 25, 2025: Donald Trump signed Executive Order 14248, directing DOJ, DHS, and DOGE to strictly enforce HAVA and election integrity laws (except, quite apparently in hindsight, Plaintiff's allegations of HAVA election fraud by the DeSantis administration).

87. On April 7, 2025: Plaintiff, invoking HAVA, RICO, and Trump's own EO 14248, filed his original sealed FCA and RICO complaint in this case, which is

believed to be the first HAVA election fraud/RICO case in the nation explicitly invoking Trump's own just-signed election integrity Executive Order.

88. Also on that day, Defendant Harmeet Dhillon was appointed Assistant Attorney General for the Civil Rights Division.

89. Also on that same day, investigator ~~Gordon Byrd~~ James Lenas (correction) from the State Attorney Bruce Bartlett's office, Plaintiff for the first time. He stated that a determination had been made by the State Attorney that no crimes had been committed after having interviewed the PCSOE staff. He told Plaintiff upon further questioning something to the effect of that he was prohibited from disclosing the root cause of the (No-No Ballot) phenomenon other than to say it was a "*process issue*", per orders issued to him by State Attorney Bruce Bartlett and his supervisor, Chief Investigator David Wawrzynski, head of the State Attorney's Investigations Unit. He would repeat the phrase "process issue" several times, as deliberately vague political talking point designed to shield the perpetrators from civil or criminal liability.

90. These rapid-fire events on April 7, 2025 — the filing of Plaintiff's sealed complaint and the State's refusal to disclose critical information to a candidate and voter who was an alleged victim of election fraud, by order of State Attorney Bruce Bartlett— and the installment of Harmeet Dhillon, marked the beginning of

a broader obstruction campaign that would soon extend to the Department of Justice and the White House itself.

91. On April 18, 2025, Plaintiff requested public records from Bartlett's office, which acknowledged receipt but slow-walked production, citing a 120+ day backlog. No records have been produced as of the date of this filing, 5 months later.

92. On April 21, 2025, Plaintiff served the sealed False Claims Act and RICO complaint, along with the required Disclosure Statement and evidence package, on DOJ Assistant U.S. Attorney Edward Martin at the U.S. Attorney's Office for the District of Columbia, and on Attorney General Pamela Bondi, via certified mail. As of April 21, 2025, Darlington, as far as Plaintiff had known, was still serving in his role as Florida's top election crimes official.

93. On April 30, 2025, Plaintiff's prospective qui tam whistleblower attorney Gary Azorsky, emailed Plaintiff about his inability to reach or speak with anyone at the DOJ, and that because of that, he was declining representation. He told Plaintiff that never in his entire career had he not been able to reach anyone at the DOJ to discuss a Qui Tam action. Plaintiff contacted upwards of 19 qui tam specialist law firms seeking representation. No one would take the case.

94. Sometime in April–May 2025: Defendants Trump, Bondi, Dhillon, and Patel, knowing that Andrew Darlington was under legal assault as a defendant in

Plaintiff's two election fraud lawsuits that risked placing Trump's 2024 election victory in jeopardy, secretly offered a bribe to Darlington in the form of a job within DOJ Civil Rights Division as Acting Chief of the Special Litigation Section, with a promise of immunity from prosecution and/or a pardon, during this case's FCA seal period, removing him from state jurisdiction and silencing him as a witness. Darlington, if left to fend for himself, might call into question the legitimacy of Trump's November 2024 victory in Florida, with its 30 electoral college votes, and in other states using VR Systems software, such as Georgia (16 electoral votes), North Carolina (16 votes) and other states, if VR Systems' software was exposed as untrustworthy, inaccurate, un-auditable, and/or unverifiable.

95. On May 1, 2025, Plaintiff filed a Motion to Extend Time to Secure Counsel. It was granted, but with a deadline of June 18, 2025, or face dismissal of the False Claims Act Count I.

96. In May 2025, the DOJ, ignoring Plaintiff and his prospective attorney, sent HAVA inquiry letters to Arizona and Colorado, and initiated voter registration inquiries in Orange County, CA—all Democratic-led.

97. On May 21, 2025, unbeknownst to Plaintiff at the time, Darlington was publicly identified for the first time in a national press story as Acting Chief of the Special Litigation Section in the DOJ Civil Rights Division under Dhillon,

revealing his DOJ role. Of note, the State of Florida did not publicly announce Darlington had left his position as Chief of Florida's Office of Election Crimes and Security until August of 2025 in a court filing in Plaintiff's Tampa case.

98. On May 27, 2025, the DOJ Civil Rights Division led by Defendant Harmeet Dhillon sued North Carolina for HAVA violations. North Carolina also happens to use VR Systems for their voter registration and vote-by-mail ballot processing.

99. On May 28, 2025: Plaintiff filed a second DOJ Civil Rights complaint (616546-BWP) with the DOJ Civil Rights Division, citing the HAVA/RICO fraud case in DC, and his Tampa election fraud lawsuit, both naming Darlington as a defendant. No response was received.

100. On June 4–5, 2025, Harmeet Dhillon sent a HAVA enforcement letter to the Wisconsin Elections Commission.

101. On June 11, 2025: Plaintiff filed a Motion to Preserve Access to Counsel and Compel DOJ Status Disclosure, and served copies the next day via certified mail on Bondi and newly installed DC US Attorney Jeanine Pirro. The DOJ did not respond to Plaintiff nor did they file any opposition or a motion to extend the seal or a declination to prosecute decision with the Court. They continued their pattern of total silence. The Court denied Plaintiff's motion.

102. On June 18, 2025: This Court dismissed the FCA Count I for lack of counsel, leaving Counts II (Fraud Upon the United States) and III (RICO) in effect, and unsealed the case.

103. On June 23, 2025: Dhillon sent a HAVA enforcement letter to Pennsylvania.

104. On July 25, 2025: Plaintiff left a voicemail with DOJ's Civil Right's Divisions Voting Section about his election fraud lawsuits asking for a call back. No response was received.

105. On July 29, 2025, 11 days after the Court dismissed the False Claims Act Count, and after the DOJ remained completely silent for three months to run out the seal clock, DC US Attorney Jeanine Pirro filed a Statement of Interest on behalf of the United States, requesting dismissal of Count II: Fraud Against the United States. The DOJ has thus taken a hostile posture against Plaintiff, a relator in a False Claims Act case, out loud now. The next day, the Court dismissed Count II.

106. On July 31, 2025: Plaintiff notified Florida Phoenix political reporter Mitch Perry of Darlington's departure from his position in Florida, revealed in a filing by the State Defendants in Plaintiff's Tampa election fraud lawsuit. Perry published an article about it that night, and later corrected it to state that his state contact had informed him that a notification email announcing Darlington's departure was sent by the State to county supervisors of elections in April, thus proving that there was

a statewide conspiracy between the State and county supervisors of elections to conceal from Plaintiff and the public at large Darlington's departure and his hire by the DOJ before and/or during the 60-day seal period.

107. On July 16, 2025: Plaintiff published on his *The Bleed – by John Liccione*<sup>2</sup> (@johnatthebleed) Substack publication “*The VR Systems No-No Ballot Bug Ron DeSantis Didn't Want Trump to See,*” alleging that DeSantis, Byrd, and Matthews and others concealed the VR Systems software defect that had falsified VBM data, while Perkins and VR Systems profited unlawfully.

108. On July 21, 2025: Plaintiff published “*What Secrets are Hidden UNDER the Epstein File on Bondi's Desk; Bondi-Trump scramble to bury my 'No-No Ballot Bug' HAVA Election Fraud Lawsuit,*” accusing Bondi and Trump of suppressing this lawsuit.

109. On July 21, 2025: Plaintiff published “*Since I'm Already on Trump's Target List... Fight? Flight? Or Triple-Down?,*” detailing his resolve to confront Trump and Putin's threats, noting Darlington's refusal to act on fraud reports.

110. On July 25, 2025: Plaintiff published “*Gatorgate - Tidalgate - NoNoBallotgate: The Florida fraud trifecta that led DeSantis to gift Alligator Alcatraz to Trump, Karma's a bitch in an alligator jumpsuit.*” This exposed and ridiculed DeSantis's cover-up of election fraud benefiting Trump, disaster recovery

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<sup>2</sup> The Bleed – by John Liccione URL: <https://thecrabbernews.substack.com/>

FEMA fraud, along with Defendants Byrd, Mathews, Marcus and Link complicit in falsified VBM reports. Plaintiff satirized the pending downfall of Trump, DeSantis, Bondi, and others due to Plaintiff's fraud, waste, and abuse exposure. The article included an AI generated graphic depiction of Trump, DeSantis, Bondi, and Kristi Noem clad in orange alligator jumpsuits each with their own bowling ball and chains, standing abreast in an alligator infested swamp with caged immigrants in the background, and with the head of the ghost of Jeffrey Epstein peering at them all from behind the swamp grass.<sup>3</sup>

111. On July 31, 2025: Plaintiff published "*Florida's Chief Election Cop Fired*" (corrected to "Fired?") Calling out what mistakenly had appeared to be Darlington's firing as evidence of a conspiracy involving Trump, Bondi, and DeSantis. He did not then know about Darlington's DOJ hiring.

112. On August 6, 2025: Plaintiff published a performance of "*Mexican Maid*" - a Woody Guthrie parody by John Liccione," a satirical song attacking Trump as 'Trumplestein' (merged with Epstein), Kristi Noem, Pam Bondi, Kash Patel, Peter Hegseth, Marco Rubio, and the "the entire Trumplestein cabinet," ending with

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<sup>3</sup> *Gatorgate – Tidalgate – NoNoBallotgate: The Florida Fraud Trifecta that led DeSantis to gift Alligator Alcatraz to Trump*. John Liccione. The Bleed. July 25, 2025; <https://thecrabbernews.substack.com/p/gatorgate-tidalgate-nonoballotgate>

‘You can't scare me Vladimir Putin-Trump, I'll be stickin' it to Putin-Trump till the day I die.’<sup>4</sup>

113. On August 13, 2025: Plaintiff published “*Meet the New Civil Rights Rollback Quarterback at the Trump DOJ*,” alleging Trump and Bondi bribed Darlington with a DOJ role to silence him as a defendant and material witness.

114. On August 15, 2025: Plaintiff published an exposé on Substack, “*The Takedown of Team Fishnet Zero - Book I Compromised*.” In it, he outed the name of an international child sex trafficking ring aligned with Vladimir Putin, Jeffrey Epstein, and others, including a reference by an operative about “*He’s eating Donald Trump*” on a recording captured in September of 2013. The name of the organization is, literally, “*The List*.”

115. On the same day, Plaintiff received another anonymous warning email. The pseudonym used by the sender was that Russian FSB defector Alexander Litvinenko, a spy who had been assassinated by Putin's SVR with radioactive polonium just 4 months after Litvinenko publicly outed Putin as a pedophile. The email read: “*Your name is on The List. Take appropriate care with this information, but we all understand why this was done.*”

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<sup>4</sup> “*Mexican Maid*,” by John Liccione; <https://thecrabbernews.substack.com/p/mexican-maid-a-woody-guthrie-parody?r=2ggjki>

116. On August 16, 2025: Plaintiff published “*Meet the Flagship of Putin's Child Sex Trafficking Navy: The Titan is Putin's Floating Locus of Sex Trafficking Evil,*” revealing Putin’s child sex trafficking operations afloat, and its use of submersibles to traffic child victims in and out of countries, and implicating Trump’s complicity.

117. On August 18, 2025: Plaintiff published “*Tanker Yachter Steeler Spy,*” exposing Putin’s child sex trafficking and Russian oil sanctions avoidance tactics.

118. On August 19, 2025: Plaintiff published “*The Fall of the House of Putin-Trump,*” forecasting the collapse of their alliance.

119. On August 21, 2025: Plaintiff published “*A Fleur for the Father,*” offering hope and justice against the depravity of state-sponsored child sex trafficking by Putin and others.

120. On August 23, 2025: Plaintiff published “*John William Liccione v. Donald J. Trump,*” telegraphing that his DC HAVA/RICO election fraud lawsuit’s first amended complaint was pending and would name Trump, Bondi, Dhillon, and other new defendants, focusing on the “No-No Ballot Bug”, the Trump -Darlington bribe, and witness tampering.

121. On August 24, 2025: Plaintiff published an article entitled “*Putin-Trump Ascendant,*” Book II of “*The Takedown of Team Fishnet Zero.*”

122. On August 28, 2025 and continuing, Plaintiff began receiving intelligence from sources referred to herein collectively as “*Radio Putin*” indicating that Putin

and Trump are conspiring to have Putin hire a Taliban hit squad and an Iraqi terrorist named “Atta” to assassinate Plaintiff and to kill his cat Rigatoni (by name), thus giving both Putin and Trump plausible deniability by using expendable terrorists as cutouts.

123. Around the same time, Plaintiff received intelligence from Radio Putin that the Trump NSA had hacked his devices and Internet connection, and that *the Russians* had obtained unredacted full copies of the aforementioned “*The Takedown of Team Fishnet Zero*” Books I and II off his laptop from the FBI/NSA.

124. On August 29, 2025: Plaintiff published “*Save the Redhead Save the World!*” citing a Russian prophecy and alleging the imminent fall of “Putin-Trump.”

125. On September 2, 2025: During an Oval Office press conference, Trump was caught on a hot mic murmuring “*Yeah, Liccione I see getting a funeral,*” just as the mic went hot, and then whispering to JD Vance “*Liccione thinks he's immune....waddaya think?*” This served to corroborate the earlier “Radio Putin” references, revealing Trump and Vance are conspiring with Vladimir Putin to assassinate Plaintiff with a Putin-outsourced terrorist hit squad.

126. On September 6, 2025: Plaintiff published “*I've Just Been Hacked by the Trump NSA - So I Hacked Back Radio Putin.*”

## V. CAUSES OF ACTION

### COUNT I

#### **VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT (RICO), 18 U.S.C. §§ 1961–1968, INCLUDING § 1962(c) AND (d)**

(All Defendants)

127. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

128. Defendants Donald J. Trump, Vladimir Vladimirovich Putin, Pamela Jo Bondi, Harmeet Kaur Dhillon, Jeanine Pirro, Edward Martin, Andrew Darlington, Kashyap Pramod Patel, Ronald Dion DeSantis, Bruce Bartlett, Cord Byrd, Maria Matthews, Julie Marcus, VR Systems, Inc., and Mindy Perkins, in both her personal capacity and as CEO of VR Systems, Inc. (collectively, the "RICO Defendants") violated 18 U.S.C. § 1962(c) by conducting or participating, directly or indirectly, in the conduct of an enterprise's affairs through a pattern of racketeering activity. Additionally, the RICO Defendants violated 18 U.S.C. § 1962(d) by conspiring to violate § 1962(c).

129. The RICO Enterprise is an ongoing association-in-fact enterprise within the meaning of 18 U.S.C. § 1961(4), consisting of the RICO Defendants and other associated individuals and entities, including but not limited to certain Florida

judges such as Edwin Jagger and others in the 6th Judicial Circuit, 2nd District Court of Appeal, and Florida Supreme Court, and unidentified Taliban/Iraqi terrorist operatives such as "Atta." The Enterprise has a hierarchical structure directed from the top by Vladimir Putin, through Donald J. Trump as the U.S.-based leader, down to federal officials under Attorney General Pamela Jo Bondi, and mirrored at the state level by Florida Governor Ronald Dion DeSantis and his subordinates. The Enterprise operates with a common purpose to conceal systemic defects in Florida's vote-by-mail (VBM) election software known as the "No-No Ballot Bug," which was developed and maintained by VR Systems, Inc.; to obstruct investigations, litigation, and disclosures related to the defect; to ensure continued receipt of federal Help America Vote Act (HAVA) funds through false certifications of election system accuracy; to protect Donald J. Trump's personal political interests by preventing exposure of potential election illegitimacy in 2016, 2024, and other elections; and to silence Plaintiff through retaliation, including unlawful surveillance, witness tampering, and an international assassination plot. The Enterprise affects interstate commerce through the use of interstate wires, such as VR Systems' servers in Virginia transmitting data to Florida, mail including DVDs of falsified reports, and international communications such as Putin's satellite network. The Enterprise has existed since at least June 2022, when the No-No Ballot Bug was embedded in software updates, and continues to the present,

demonstrating both closed-ended continuity through multiple related acts over years and open-ended continuity through the ongoing threat of future criminal acts, including continued falsification of records and assassination attempts.

130. The Enterprise is distinct from each RICO Defendant as a "person" under 18 U.S.C. § 1961(3). Each Defendant is employed by or associated with the Enterprise and participates in its conduct, but the Enterprise is a separate entity formed by their collective association for illicit purposes beyond their individual roles or official duties.

131. Each RICO Defendant plays a specific role in the Enterprise as detailed in the following paragraphs.

132. Vladimir Vladimirovich Putin, as President of the Russian Federation and in his personal capacity, directs the Enterprise from the top by providing overall command and control via secure satellite communications, orchestrates the international terrorism component and direct action Russian operative teams on US soil, including outsourcing the assassination plot against Plaintiff to Taliban/Iraqi terrorists, and collaborates with Trump to conceal election interference that benefits Russian interests, while also authorizing hacks and threats to silence critics like Plaintiff who exposed Russian influence operations tied to Trump.

133. Donald J. Trump, in his personal capacity, serves as the U.S. leader of the Enterprise by directing federal and state actors to conceal the No-No Ballot Bug,

obstruct Plaintiff's complaints, and retaliate against him, personally benefiting by protecting his 2024 election victory from overturn, conspiring with Putin for the assassination plot as evidenced by his hot mic comment on September 2, 2025 stating "*Yeah, Liccione I see getting a funeral,*" and directing Bondi and subordinates to bribe Darlington and ignore civil rights complaints.

134. Pamela Jo Bondi, as Attorney General, executes Trump's directives at the federal level by overseeing the suppression of Plaintiff's DOJ complaints, selective HAVA enforcement against Democratic states, and bribery of Darlington with a DOJ position, while participating in obstruction by maintaining silence during the FCA seal period and filing hostile statements of interest.

135. Harmeet Kaur Dhillon, as Assistant Attorney General for the Civil Rights Division, aids in obstructing Plaintiff's civil rights complaints such as IDs 586580-NHV and 616546-BWP, issuing selective HAVA letters for example to North Carolina on May 27, 2025, Wisconsin on June 4-5, 2025, and Pennsylvania on June 23, 2025, and bribing Darlington to silence him as a witness.

136. Jeanine Pirro, as U.S. Attorney for the District of Columbia, obstructs this lawsuit by filing a Statement of Interest on July 29, 2025 seeking dismissal of Count II and failing to respond to Plaintiff's motions such as the June 11, 2025 motion.

137. Edward Martin, as former Acting U.S. Attorney, participated in initial obstruction by receiving service of the sealed complaint on April 21, 2025 and contributing to DOJ's non-response strategy.

138. Andrew Darlington, as Acting Chief of the Special Litigation Section and former Florida Election Crimes Chief, accepted a bribe in the form of a DOJ job offer in April-May 2025 to defect from Florida, silencing him as a defendant and witness, hung up on Plaintiff on August 13, 2025, and participated in selective enforcement.

139. Kashyap Pramod Patel, as FBI Director, directs the FBI's and NSA's domestic surveillance roles in the Enterprise by weaponizing both agencies to hack Plaintiff's devices via fraudulent FISA warrants or warrantless surveillance in furtherance of retaliation, as corroborated by "Radio Putin" intelligence sources starting on or before August 28, 2025.

140. Ronald Dion DeSantis, as Florida Governor, mirrors the federal tier at the state level by directing Byrd and Matthews to publish falsified VBM reports and conceal the No-No Ballot Bug to protect Trump's Florida victory with its 30 electoral votes.

141. Cord Byrd, as Florida Secretary of State, oversees the statewide publication of falsified VBM reports such as those published on June 24, 2024 containing a spike dated June 23, 2024; on June 27, 2024 containing a spike dated June 26,

2024; and on September 10, 2024 containing a spike dated September 9, 2024, and directs county supervisors to comply, committing multiple wire fraud acts.

142. Maria Matthews, as Director of the Florida Division of Elections, implements the falsification scheme by transmitting corrupted reports in violation of Rule 1S-2.043 and DS-DE 145.

143. Julie Marcus, as Pinellas County Supervisor of Elections, publishes county-level falsified reports such as the 38 reports to Plaintiff during the March 2025 Gulfport election, each with false data for over 2,200 records including Plaintiff's, and fails to provide statutorily required reports.

144. Bruce Bartlett, as State Attorney for the Sixth Judicial Circuit, obstructs investigations by ordering investigators such as Gordon Byrd on April 7, 2025 to lie about the bug as a "process issue," stonewalling public records requests from April 18, 2025, and quashing grand jury probes.

145. VR Systems, Inc., as the corporate provider of election software, develops, deploys, and maintains the defective software hosting the No-No Ballot Bug in its Amazon Web Services data center in Virginia, profiting from contracts while concealing the defect to avoid loss of business in Florida, Georgia, North Carolina, and other states.

146. Mindy Perkins, in both her personal capacity and as CEO of VR Systems, Inc., oversees the development, deployment, and maintenance of the defective

software, knowingly concealed the No-No Ballot Bug to protect corporate profits and contracts, and collaborates with state officials to perpetuate the falsification scheme, directly participating in the enterprise's racketeering activities.

147. The RICO Defendants engaged in a pattern of at least two, and in fact hundreds of related predicate acts under 18 U.S.C. § 1961(1), demonstrating both horizontal relatedness through the common purpose of concealment and retaliation and vertical relatedness through similar methods, victims, and results. The acts span from at least as far back as June 2022 and certainly no later than June 2024 to the present, showing closed-ended continuity across at least the last 15 months if not multiple years, and open-ended continuity through ongoing threats, fraudulent representations, coverups, and obstruction and denial of honest services. Specific predicates include the following:

148. Wire fraud under 18 U.S.C. § 1343 and mail fraud under 18 U.S.C. § 1341, including honest services fraud under 18 U.S.C. § 1346, encompass over 1,000 acts across Florida elections since June of 2024. For example, the publication of 75 falsified statewide VBM snapshot reports per election cycle, such as the report published on June 24, 2024 containing a Pinellas ballot request spike dated June 23, 2024 with over 219,000 false "N/N" entries, the report published on June 27, 2024 containing a Miami-Dade spike dated June 26, 2024 with over 186,000, and the report published on September 10, 2024 containing a Pinellas spike dated

September 9, 2024 with over 196,000, were each transmitted interstate from VR Systems' Amazon-hosted Virginia servers to Florida and falsely certified compliance with HAVA and Rule 1S-2.043 to deprive Plaintiff and others of accurate records.

149. In Plaintiff's March 11, 2025 Gulfport election, Marcus knowingly published 38 falsified reports via the county portal, ceasing prematurely and omitting weekends and holidays, each containing over 2,200 false election records including Plaintiff's false January 11, 2025 request date and "N/N" flags, constituting 38 separate wire fraud acts. When this pattern is repeated across 64 counties using VR Systems, it yields thousands of false transmissions, some delivered through the mail on DVDs, and these acts were knowing, with intent to defraud candidates like Plaintiff of honest election services.

150. Bribery under 18 U.S.C. § 201 or Florida state equivalents under § 1961(1)(A) includes at least one act where Trump, Bondi, and Dhillon bribed Darlington in April-May 2025 with a DOJ job during the FCA seal period to silence him as a witness and remove him from state jurisdiction in return for the job and a promise of immunity from prosecution by the DOJ and/or a Trump pardon.

151. Obstruction of justice under 18 U.S.C. § 1503 and witness tampering under 18 U.S.C. § 1512 include multiple acts such as DOJ's non-responses to Plaintiff's

civil rights complaints on March 22, 2025 and May 28, 2025 and voicemail on July 25, 2025; Bartlett ordering his investigator to lie to Plaintiff on April 7, 2025 that it was a "process issue" and stonewalling records requests; selective HAVA enforcement such as letters to Arizona, Colorado, Wisconsin, and Pennsylvania in May-June 2025 and a HAVA enforcement lawsuit against North Carolina to distract; Pirro's July 29, 2025 Statement of Interest filing; Darlington hanging up on Plaintiff on August 13, 2025 and refusing to take action on John Siamas election fraud complaints, and Florida judges failing to recuse despite conflicts such as their own falsified VBM records, then dismiss election fraud cases brought in the 6<sup>th</sup> Circuit in Pinellas County.

152. Travel or transportation in aid of racketeering for murder-for-hire under 18 U.S.C. § 1958 includes at least one act where Putin and Trump conspired since August 28, 2025 per "Radio Putin" provided intelligence to hire Taliban/Iraqi operatives such as one named "Atta" for Plaintiff's assassination on U.S. soil, using interstate and international facilities, including threats to murder his cat Rigatoni by name.

153. Treason under 18 U.S.C. § 2381 includes at least one act where Trump and other U.S. citizen Defendants such as Vance, Bondi, Dhillon, Pirro, Patel, and DeSantis conspired with Vladimir Putin as President of Russia and Taliban/Iraqi terrorist operatives, with the Taliban as the de facto ruling government of

Afghanistan, to assassinate Plaintiff, a U.S. citizen, on U.S. soil, and Russia and the Taliban are hostile states to the United States under various laws such as U.S. sanctions against Russia for its invasion of Ukraine and the Taliban's designation as a terrorist organization with ongoing hostilities post-U.S. withdrawal from Afghanistan, constituting adherence to enemies of the United States and giving them aid and comfort within the meaning of Article III, Section 3 of the U.S. Constitution and 18 U.S.C. § 2381.

154. Computer fraud and abuse under 18 U.S.C. § 1030 and unlawful surveillance under 18 U.S.C. § 2520 include multiple acts where Trump and Bondi Directed Patel to order the FBI/NSA hacks of Plaintiff's devices and internet connection starting on or before August 28, 2025 via fraudulent FISA or warrantless means to obtain documents and terrorize him.

155. Misprision of felony under 18 U.S.C. § 4 and deprivation of honest services include ongoing acts by state and federal officials willfully concealing felonies such as fraud and breaching duties for personal gain.

156. Each RICO Defendant participated in the operation or management of the Enterprise, directing or executing its affairs beyond mere official duties, for example through Trump's personal directives and Bondi's oversight of bribery.

157. As a direct and proximate result, Plaintiff suffered concrete financial losses to his business and property, including damages to his 2024 congressional and

2025 mayoral campaigns such as lost votes due to falsified records where he believed fraud caused his March 11, 2025 defeat; costs incurred in investigating and pursuing election fraud cases for over a year, financial harm to his publishing business RussiLeaks including from retaliation and surveillance; cost of having to hire personal armed security, property threats such as to his cat as chattel; and emotional and reputational damages. Though RICO focuses on pecuniary loss, and these injuries were foreseeable and caused by the pattern of racketeering.

158. Plaintiff demands judgment against the RICO Defendants for treble damages, punitive damages, costs, attorney's fees if applicable, and such other relief as the Court deems just under 18 U.S.C. § 1964(c).

## **COUNT II – NEGLIGENCE**

(Against Defendants VR Systems, Inc. and Mindy Perkins, Individually and in her capacity as CEO of VR Systems, Inc.)

159. Plaintiff incorporates by reference ¶¶ 1, 28-30, 35, 37, 40-41, 43, 45, 47, 49-50, 52, 54, 56, 59, 61, 63, 66, 68, 70, 75, 78, 87, 89, 92, 95, 98, 100, 102, 105, 107, 109, 112, 115, 118, 121, 123, 125-126 as if fully set forth herein

160. Defendants VR Systems, Inc. and its CEO, Mindy Perkins, designed, developed, and maintained election software used to generate official vote-by-mail (“VBM”) reports in Florida.

161. Defendants owed a duty of reasonable care to election officials, candidates, and voters, including Plaintiff, to ensure that the software functioned accurately, free from known defects, and that any discovered defects were timely cured.

162. Defendants also owed a duty to notify their customers and affected election candidates, including Plaintiff, of material defects in the software and the falsified VBM reports it generated. This duty included:

163. Prompt disclosure of the existence of the “No-No Ballot Bug”;

164. Warning that VBM reports generated by the software were false and should not be relied upon;

165. Explaining the manner in which the reports were falsified;

166. Providing reassurances that, while the reports were corrupted, no actual votes were flipped and no mail ballots among those marked “N/N” had been fraudulently ordered without voter ID numbers; and

167. Issuing retractions or corrections of all previously distributed false reports, and notifying customers and candidates of any patch deployment and independent validation required before reports could be deemed reliable.

168. Defendants breached these duties by failing to timely cure the defect, failing to disclose its existence, failing to warn that reports were false and untrustworthy, failing to retract prior false reports, and failing to provide notice of any validated correction. Instead, they continued to permit use of the defective software in

official elections, ensuring that false VBM reports would continue to be generated and distributed.

169. As a direct and foreseeable result of Defendants' negligence, Plaintiff received falsified VBM reports on multiple occasions as follows.

170. In the August 2024 primary election, via reports obtained from Chris Gleason and John Siamas, who received them from the Florida Division of Elections ("FDOE");

171. In the March 2025 Gulfport mayoral election, when Plaintiff directly received 38 daily falsified reports, each containing over 2,200 false records, including Plaintiff's own ballot history; and

172. In the April 1, 2025 Palm Beach County special election, via a Palm Beach County Republican Party election-integrity watcher, whose analysis confirmed the bug's artifacts persisted across counties and elections.

173. Plaintiff reasonably relied on these reports and, believing they evidenced mail-ballot fraud, filed two election-fraud lawsuits, lodged a criminal complaint with the Gulfport Police Department, petitioned State Attorney Bruce Bartlett for a grand jury probe, and pursued related legal actions — all premised on false data caused by Defendants' defect and nondisclosure.

174. Plaintiff, acting pro se, expended thousands of hours of time and labor and incurred financial losses in legal expenses, service costs, postal fees, filing fees, and related costs.

175. Plaintiff's damages flow directly and proximately from Defendants' negligence in providing defective software, failing to disclose and cure the defect, and continuing to allow use of false VBM reporting without warnings or retractions.

176. WHEREFORE, Plaintiff demands judgment against VR Systems, Inc. and Mindy Perkins, jointly and severally, for compensatory damages, costs, and such other relief as the Court deems just and proper.

### **COUNT III – GROSS NEGLIGENCE**

(Against Defendants VR Systems, Inc. and Mindy Perkins, Individually and in her Corporate Capacity as CEO of VR Systems, Inc.)

177. Plaintiff incorporates by reference ¶¶ 1, 28-30, 35, 37, 40-41, 43, 45, 47, 49-50, 52, 54, 56, 59, 61, 63, 66, 68, 70, 75, 78, 87, 89, 92, 95, 98, 100, 102, 105, 107, 109, 112, 115, 118, 121, 123, 125-126 as if fully set forth herein.

178. Defendants knew, or reasonably should have known, of a critical defect in their software — the “No-No Ballot Bug” — that caused VBM reports to record false ballot-request data.

179. This defect created an imminent and obvious danger to the rights of candidates and voters, including Plaintiff, by corrupting official election records relied upon to monitor, audit, and litigate elections.

180. Despite actual or constructive knowledge of this danger, Defendants acted with reckless indifference by:

- a. Continuing to deploy and maintain the defective software;
- b. Failing to timely cure or patch the defect;
- c. Failing to notify customers or candidates of the bug's existence;
- d. Failing to warn that VBM reports were false and should not be relied upon;
- e. Failing to explain how the reports were falsified;
- f. Failing to provide reassurances that, although the reports were corrupted, no actual votes were flipped and no "N/N" mail ballots were fraudulently ordered without voter ID numbers; and
- g. Failing to retract prior false reports or provide any independent validation establishing reliability of subsequent reports.

181. As a direct result, Plaintiff was misled by false VBM reports in:

- a. The August 2024 primary election (via FDOE through Gleason and Siamas);

- b. The March 2025 Gulfport mayoral election (receiving 38 daily falsified reports with over 2,200 false entries each, including Plaintiff's own record); and
- c. The April 1, 2025 Palm Beach County special election (analysis shared by a local Republican Party election-integrity watcher confirming ongoing artifacts).

182. Plaintiff relied on those reports and consequently filed a pre-election challenge in the Gulfport mayoral election based on the falsified data, as well as two election-fraud lawsuits, a Gulfport criminal complaint, and a grand-jury probe request to State Attorney Bruce Bartlett, among other actions — all premised on false data.

183. Plaintiff, acting pro se, spent thousands of hours and significant energy pursuing these legal actions, incurring additional costs including legal fees, service costs, postage, and filing fees.

184. Defendants' conduct was not mere carelessness but rose to the level of gross negligence and reckless disregard for the rights of Plaintiff and others.

185. WHEREFORE, Plaintiff demands judgment against VR Systems, Inc. and Mindy Perkins, jointly and severally, for compensatory damages, punitive damages, costs, and such other relief as the Court deems just and proper.

186.

**COUNT IV – CIVIL CONSPIRACY TO COMMIT MURDER-FOR-HIRE**

**(18 U.S.C. § 1958)**

(Against Defendants Donald J. Trump, Vladimir Vladimirovich Putin, Pamela Jo Bondi, Kashyap Pramod Patel, and James David Vance, in their personal capacities)

187. Plaintiff incorporates by reference ¶¶ 1-126 including all paragraphs describing Plaintiff's political, journalistic, and artistic and legal activities which establish the above Defendants motive to retaliate, as if fully set forth herein.

188. Defendants Donald J. Trump, Vladimir Vladimirovich Putin, Pamela Jo Bondi, Kashyap Pramod Patel, and James David Vance, acting in their personal capacities, conspired to commit murder-for-hire in violation of 18 U.S.C. § 1958, which prohibits the use of interstate or foreign commerce facilities with intent to commit murder for pecuniary consideration or promise thereof.

189. The conspiracy involved an agreement to assassinate Plaintiff on U.S. soil, outsourcing the act to Putin and through his proxy Taliban/Iraqi terrorist operatives (e.g., "Atta") from the sanctioned ruling government of Afghanistan, using international and interstate communications and facilities to facilitate the plot.

190. Putin initiated and directed the conspiracy from Russia, providing the Taliban operatives as agents of a hostile, sanctioned state, weapons, and logistical support.

191. Trump agreed to the plot with Putin to silence Plaintiff's whistleblowing on election fraud and to prevent nullification of his 2024 election, and removal from office, and imprisonment, as evidenced by his hot mic comment on September 2, 2025, stating "*Yeah, Liccione I see getting a funeral,*" and threats to have murdered Plaintiff's cat Rigatoni, by name.

192. Vance participated in the conspiracy, as evidenced by his exchanged whispers with Trump during the hot mic incident, "*i.e., Liccione thinks he's immune....waddaya think?*" endorsing the assassination to protect Trump's 2024 election from nullification and his removal from office and imprisonment.

193. Bondi facilitated by overseeing DOJ obstruction and silence to enable the plot's cover-up and protect Trump from imprisonment.

194. Patel supported through FBI/NSA surveillance to aid targeting and execution, furthering the goal of preventing Trump's legal consequences.

195. Darlington's acceptance of a bribe ensured silence, removing a potential witness to the election fraud that motivated the plot and its aim to avoid Trump's imprisonment.

196. The conspiracy's object was murder in exchange for pecuniary or political consideration, including protecting Trump's election from overturn, nullifying his election, removing him from office, and preventing his imprisonment,

197. As a direct and proximate result, Plaintiff suffered damages, including emotional distress triggering his PTSD, financial losses for security measures, and reputational harm.

198. WHEREFORE, Plaintiff demands judgment against Defendants Trump, Putin, Bondi, Patel, and Vance, jointly and severally, for compensatory damages, punitive damages, costs, and such other relief as the Court deems just and proper.

**COUNT V – VIOLATION OF THE ANTI-TERRORISM ACT  
(18 U.S.C. § 2333)**

(Against Defendants Donald J. Trump, Vladimir Vladimirovich Putin, Pamela Jo Bondi, Kashyap Pramod Patel, and James David Vance, in their personal capacities)

199. Plaintiff incorporates by reference ¶¶ 1–126, including all paragraphs describing Plaintiff’s political, journalistic, artistic, and legal activities which establish the above Defendants’ motive to retaliate, as if fully set forth herein.

200. Defendants Donald J. Trump, Vladimir Vladimirovich Putin, Pamela Jo Bondi, Kashyap Pramod Patel, and James David Vance, acting in their personal capacities, engaged in acts of international terrorism against Plaintiff, a U.S. citizen, in violation of the Anti-Terrorism Act, 18 U.S.C. § 2333(a), which provides a civil remedy for treble damages and other relief.

201. Defendants conspired to carry out an international assassination plot against Plaintiff on U.S. soil, outsourcing the hit through Putin to Taliban terrorist operatives who represent the ruling government of Afghanistan, a terrorist state subject to U.S. sanctions under Executive Order 13224 and the United Nations 1988 Afghanistan sanctions regime, using interstate and international facilities, in violation of 18 U.S.C. § 2332b(g)(5)(B) (acts dangerous to human life that appear intended to coerce or influence government policy by intimidation or coercion).

202. Putin directed the terrorism outsourcing component from the Kremlin via secure satellite communications, with Trump, authorizing the Taliban, as the sanctioned ruling government of Afghanistan, to act as their paid assassins.

203. Trump, in his personal capacity, conspired with Putin to execute the plot to silence Plaintiff's whistleblowing and public advocacy against them, as evidenced by Trump's his hot mic comment on September 2, 2025, stating "Yeah, Liccione I see getting a funeral," and other threats by Putin's operatives to murder Plaintiff's cat Rigatoni by name.

204. Vance, as Vice President, conspired with Trump before, during, and after the hot mic incident on September 2, 2025, whispering "Liccione thinks he's immune....waddaya think?" to endorse the assassination plot and protect Trump's 2024 election victory.

205. Bondi facilitated the plot by overseeing DOJ silence and selective enforcement to protect Trump's interests, and by ordering FBI Director Patel to direct FBI/NSA involvement in related unlawful surveillance against Plaintiff to support the plot.

206. These acts constitute international terrorism under 18 U.S.C. § 2331(1), as they involved violent acts by the Taliban, the sanctioned ruling government of Afghanistan, directed by Putin, the President of the Russian Federal, a sanctioned hostile foreign power in a hot war with Ukraine, an American ally, in furtherance of political coercion against U.S. government policy on election integrity and American military and intelligence support to Ukraine.

207. The plot was intended to intimidate and coerce Plaintiff, a U.S. citizen and candidate, from disclosing election fraud that could overturn Trump's 2024 victory, affecting U.S. commerce and government, and ultimately to take his life, and that of his emotional support cat Rigatoni.

208. As a direct and proximate result, Plaintiff suffered damages, including emotional distress triggering his PTSD, financial losses from security measures, and reputational harm.

209. WHEREFORE, Plaintiff demands judgment against Defendants Trump, Putin, Bondi, Patel, and Vance, jointly and severally, for treble damages, punitive

damages, costs, and such other relief as the Court deems just and proper under 18 U.S.C. § 2333.

**COUNT VI – VIOLATION OF THE COMPUTER FRAUD AND ABUSE  
ACT  
(18 U.S.C. § 1030)**

(Against Defendants Donald J. Trump, Pamela Jo Bondi, Kashyap Pramod Patel,  
and Vladimir Vladimirovich Putin)

210. Plaintiff incorporates by reference ¶¶ 1-126, including all paragraphs describing Plaintiff's political, journalistic, artistic, and legal activities which establish the above Defendants' motive to retaliate, as if fully set forth herein.

211. Defendants intentionally accessed Plaintiff's computers, devices, and internet connection without authorization or exceeded authorized access, in violation of 18 U.S.C. § 1030(a)(2)(C) and (a)(5).

212. The unauthorized access included hacking Plaintiff's devices via fraudulent FISA warrants or warrantless surveillance by the NSA and FBI, directed by Trump through Bondi and Patel, with Putin providing authorization and coordination, to obtain unredacted documents and terrorize Plaintiff.

213. This access caused damage and loss to Plaintiff, including financial losses exceeding \$5,000 in a one-year period, such as costs for investigating the hacks,

securing devices, and pursuing legal remedies, as well as harm to his publishing business from the retaliation.

214. The violations were part of the broader conspiracy to silence Plaintiff's whistleblowing on the No-No Ballot Bug.

215. As a direct and proximate result, Plaintiff suffered concrete losses, including thousands of hours of time, legal expenses, and reputational harm leading to financial injury.

216. WHEREFORE, Plaintiff demands judgment against the Defendants for compensatory damages (including economic loss), punitive damages, costs, attorney's fees, and such other relief as the Court deems just and proper under 18 U.S.C. § 1030(g).

### **COUNT VII – VIOLATION OF THE WIRETAP ACT (18 U.S.C. § 2520)**

(Against Defendants Donald J. Trump, Pamela Jo Bondi, and Kashyap Pramod Patel, in their personal capacities)

217. Plaintiff incorporates by reference ¶¶ 1-126 including all paragraphs describing Plaintiff's political, journalistic, artistic, and legal activities which establish the above Defendants' motive to retaliate, as if fully set forth herein.

218. Defendants Donald J. Trump, Pamela Jo Bondi, and Kashyap Pramod Patel, acting in their personal capacities, intentionally intercepted or endeavored to

intercept Plaintiff's electronic communications without authorization or legal justification, in violation of 18 U.S.C. § 2511.

219. The unauthorized interception included warrantless surveillance and hacking of Plaintiff's devices and internet connection by the NSA and FBI, directed by Trump through Bondi and Patel, as part of the effort to silence Plaintiff's whistleblowing and peaceful political protests and speech.

220. This conduct violated the Electronic Communications Privacy Act, entitling Plaintiff to civil remedies under 18 U.S.C. § 2520(a).

221. As a direct and proximate result, Plaintiff suffered damages, including financial losses exceeding \$10,000 in a one-year period for investigating the intercepts, securing devices, and pursuing legal remedies, as well as emotional distress triggering his PTSD.

222. WHEREFORE, Plaintiff demands judgment against Defendants Trump, Bondi, and Patel, jointly and severally, for statutory damages, punitive damages, costs, attorney's fees, and injunctive relief as provided under 18 U.S.C. § 2520(b).

**COUNT VIII – WIRE AND MAIL FRAUD (18 U.S.C. §§ 1343, 1341)**

(Against Defendants Ron DeSantis, Cord Byrd, Maria Matthews, Julie Marcus, VR Systems, Inc., and Mindy Perkins, in their personal and official or corporate capacities)

223. Plaintiff incorporates by reference ¶¶ 1–126, including all paragraphs describing Plaintiff’s political, journalistic, artistic, and legal activities which establish the above Defendants’ motive to retaliate, as if fully set forth herein.

224. Defendants Cord Byrd, Maria Matthews, Julie Marcus, VR Systems, Inc., and Mindy Perkins devised and executed a scheme to defraud Plaintiff of honest election services by transmitting knowingly false VBM reports via interstate and intrastate wires and mail, in violation of 18 U.S.C. §§ 1343 and 1341.

225. Byrd, as Florida Secretary of State, at the direction of Governor Ron DeSantis, oversaw the statewide distribution of over 1,000 falsified VBM reports, knowing they violated Rule 1S-2.043, and directed county supervisors to comply, using interstate wire transmissions from VR Systems’ Amazon-hosted Virginia servers.

226. Matthews, as Director of the Florida Division of Elections, implemented the scheme by transmitting corrupted reports interstate, furthering the fraud.

227. Marcus, as Pinellas County Supervisor of Elections, published 38 falsified reports to Plaintiff during the March 2025 Gulfport election, each containing over

2,200 false entries including Plaintiff's own false record, transmitted via the Internet to Plaintiff's laptop in Pinellas County.

228. VR Systems, Inc., and its CEO Mindy Perkins developed, deployed, and maintained, and operated the knowingly defective software with the No-No Ballot Bug, knowingly enabling the transmission of falsified VBM reports via wires and mail (e.g., DVDs), concealing the defect to protect their revenue stream not just from Florida and the federal government through HAVA grants, but for at least eight other states using their software to include Georgia, North Carolina, Texas, California, Maryland, DC, New York, and others.

229. The scheme was executed with intent to deceive Plaintiff and other candidates, depriving him and them of accurate election data to monitor their elections, to make informed electioneering decisions based on who had already voted their VBM ballots, and informed decisions on whether to sue for election fraud in the face of what were massive VBM ballot request spikes in the 2024 and March 2025 elections.

230. As a direct and proximate result, Plaintiff suffered damages, including financial losses from relying on false data to pursue legal actions and reputational harm, it contributed to his Gulfport mayoral election loss due to that reputational harm.

231. WHEREFORE, Plaintiff demands judgment against Defendants DeSantis, Byrd, Matthews, Marcus, VR Systems, Inc., and Perkins, jointly and severally, for compensatory damages, costs, and such other relief as the Court deems just and proper.

### **COUNT IX – CIVIL RIGHTS VIOLATIONS UNDER BIVENS**

(Against Defendants Donald J. Trump, Pamela Jo Bondi, Harmeet Kaur Dhillon, Jeanine Pirro, Edward Martin, Andrew Darlington, and Kashyap Pramod Patel, in their personal capacities)

232. Plaintiff incorporates by reference ¶¶ 1–126, including all paragraphs describing Plaintiff’s political, journalistic, artistic, and legal activities which establish the above Defendants’ motive to retaliate, as if fully set forth herein.

233. Defendants Donald J. Trump, Pamela Jo Bondi, Harmeet Kaur Dhillon, Jeanine Pirro, Edward Martin, Andrew Darlington, and Kashyap Pramod Patel, acting under color of federal authority in their personal capacities, deprived Plaintiff of rights secured by the Constitution of the United States and common law, for which no adequate alternative remedy exists, in violation of *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971).

234. Defendants violated Plaintiff’s First Amendment rights to free speech and petition by retaliating against his disclosure of the No-No Ballot Bug and obstructing his civil rights complaints and his FCA/RICO lawsuits, motivated by

his political affiliation as a Democrat suing a Republican governor and his cabinet, which potentially risked overturning Trump's 2024 election.

235. Defendants violated Plaintiff's Fourth Amendment right to be free from unreasonable searches and seizures by directing unauthorized hacking of his devices via fraudulent FISA warrants or warrantless surveillance by the NSA and FBI.

236. Defendants violated Plaintiff's Fifth Amendment right to due process by obstructing his False Claims Act qui tam count through willful silence, failure to perform FCA duties, and denying access to counsel by refusing to communicate, to run out the 60-day seal clock, motivated their desire to keep Trump in power and out of prison.

237. Defendants committed an invasion of privacy by publicly disclosing or using private information obtained through unauthorized hacking of Plaintiff's devices, including unredacted documents he had published in redacted form related to his whistleblowing and political activities against Putin and Trump.

238. Defendants committed intrusion upon seclusion by intentionally intruding into Plaintiff's private affairs through unauthorized surveillance and hacking, in a manner highly offensive to a reasonable person.

239. Trump, Bondi, and Dhillon offered Andrew Darlington a bribe in the form of a DOJ job and promise of immunity from prosecution by the DOJ and/or a

Trump pardon, in return for his silence as a witness to protect Trump's personal interests in not having his 2024 election overturned, which directly contributed to the retaliation and obstruction.

240. Trump personally directed the retaliation, surveillance, and privacy intrusions to protect his political interests, as evidenced by his hot mic comment on September 2, 2025, stating "Yeah, Liccione I see getting a funeral."

241. Bondi oversaw the DOJ's non-responses to Plaintiff's complaints and facilitated the surveillance and privacy violations, breaching her duty to uphold civil rights.

242. Dhillon obstructed Plaintiff's civil rights complaints (e.g., IDs 586580-NHV and 616546-BWP) and issued selective HAVA enforcement to distract from the fraud, furthering the retaliation and privacy intrusions.

243. Pirro filed a hostile Statement of Interest on July 29, 2025, and failed to respond to Plaintiff's motions (e.g., June 11, 2025), denying Plaintiff due process.

244. Martin contributed to the initial obstruction by receiving the sealed complaint on April 21, 2025, and maintaining silence during the conspiracy.

245. Darlington accepted the bribe from Trump and Bondi, hung up on Plaintiff on August 13, 2025, and refused to act on fraud reports from him and John Siamas, obstructing Plaintiff's petitioning efforts.

246. Patel directed the FBI and NSA to hack Plaintiff's devices and internet connection starting on or before August 28, 2025, causing direct harm through unauthorized access and privacy violations.

247. As a direct and proximate result, Plaintiff suffered damages, including lost time, financial losses from securing devices and Internet connectivity, and legal action, reputational harm, and emotional distress triggering his PTSD.

248. WHEREFORE, Plaintiff demands judgment against Defendants Trump, Bondi, Dhillon, Pirro, Martin, Darlington, and Patel, in their personal capacities, for compensatory damages, punitive damages, costs, and such other relief as the Court deems just and proper.

**COUNT X – CIVIL RIGHTS VIOLATIONS UNDER  
42 U.S.C. § 1983 AND § 1985(3)**

(Against Defendants Ronald Dion DeSantis, Cord Byrd, Maria Matthews, Julie Marcus, and Bruce Bartlett, in their personal capacities)

249. Plaintiff incorporates by reference ¶¶ 1–126, including all paragraphs describing Plaintiff's political, journalistic, artistic, and legal activities which establish Defendants' motive to retaliate, as well as all paragraphs describing the actions of state officials in publishing falsified vote-by-mail reports, obstructing Plaintiff's legal remedies, and depriving Plaintiff of rights secured by the

Constitution, together with all paragraphs describing the injuries and damages suffered by Plaintiff, as if fully set forth herein.

250. Defendants Ronald Dion DeSantis, Cord Byrd, Maria Matthews, Julie Marcus, and Bruce Bartlett, acting under color of state law in their personal capacities, deprived Plaintiff of rights, privileges, and immunities secured by the Constitution and laws of the United States, in violation of 42 U.S.C. § 1983.

251. Defendants conspired to violate Plaintiff's civil rights, including his Fourteenth Amendment right to due process by obstructing access to accurate election records and fair judicial proceedings, in violation of 42 U.S.C. § 1985(3).

252. Specifically, DeSantis directed the falsification and concealment of VBM reports to protect Trump's political interests as well as those of Anna Paulina Luna, breaching his duty to ensure election integrity and obstructing Plaintiff's due process.

253. Byrd oversaw the statewide distribution of falsified reports, knowing they violated Rule 1S-2.043, and directed county supervisors to comply, further denying Plaintiff access to truthful election data.

254. Matthews implemented the falsification scheme by transmitting false VBM reports, contributing to the deprivation of Plaintiff's due process rights.

255. Marcus published 38 falsified reports to Plaintiff during the March 2025 Gulfport election, each containing false data, and failed to provide required reports,

directly impairing Plaintiff's ability to seek judicial relief, and covered up that she was doing so until two days after Plaintiff lost his Gulfport Mayoral election after his pre-election challenge had been received, and ignored.

256. Bartlett quashed investigations and a grand jury probe by ignoring the rule of law, by order his subordinate to lie to Plaintiff about the bug as a "process issue," stonewalling Plaintiff's records requests, all of which is preventing Plaintiff from obtaining fair judicial review.

257. This conspiracy involved a meeting of the minds to obstruct Plaintiff's access to accurate records and fair proceedings, motivated by his status as a Democratic candidate and registered voter victimized by election fraud, constituting a basis for relief under § 1985(3).

258. As a direct and proximate result, Plaintiff suffered damages, including thousands of hours of wasted efforts, financial losses from pursuing legal actions based on false government election data, and reputational harm from being targeted as a frivolous pro se litigant and an election denier and conspiracy theorist.

259. WHEREFORE, Plaintiff demands judgment against Defendants DeSantis, Byrd, Matthews, Marcus, and Bartlett, in their personal capacities, for compensatory damages, punitive damages, costs, and such other relief as the Court deems just and proper.

## **VI. PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff John William Liccione, pro se, respectfully demands judgment against Defendants, jointly and severally where applicable, and prays for the following relief:

- A. Compensatory Damages:** Award Plaintiff compensatory damages in an amount to be determined at trial, but reasonably estimated to exceed **\$50 million**, for financial losses, wasted campaign expenditures, lost opportunities, reputational harm, emotional distress, injury to business and property, and the chilling of Plaintiff's political, journalistic, artistic, and legal activities.
- B. Treble Damages under RICO (18 U.S.C. § 1964(c))** — Award Plaintiff threefold the damages he sustained to his business and property by reason of Defendants' racketeering activity.
- C. Treble Damages under the Anti-Terrorism Act (18 U.S.C. § 2333)** — Award Plaintiff threefold the damages he sustained as a victim of acts of international terrorism perpetrated by Defendants in conspiracy with hostile foreign actors.

**D. Punitive Damages** — Award punitive damages against Defendants whose conduct was willful, malicious, reckless, or in callous disregard of Plaintiff's rights, in an amount sufficient to punish and deter such conduct, but reasonably estimated to exceed **\$200 million**.

**E. Statutory Damages** — Award Plaintiff statutory damages as provided by law, including but not limited to damages under the Wiretap Act (18 U.S.C. § 2520) of not less than **\$10,000 per violation or \$100 per day of violation**, and damages and injunctive relief under the Computer Fraud and Abuse Act (18 U.S.C. § 1030(g)), in addition to compensatory, punitive, and treble damages.

**F. Declaratory Relief** — Issue a declaration that Defendants' acts, including the concealment of systemic defects in election systems, obstruction of judicial proceedings, retaliation against Plaintiff's protected activities, unlawful surveillance of Plaintiff, and conspiracy with hostile foreign powers, violated Plaintiff's rights under the Constitution and laws of the United States.

**G. Injunctive Relief** — Enter appropriate injunctive relief prohibiting continued reliance on falsified vote-by-mail reports, requiring corrective disclosures, and enjoining Defendants from further retaliation against Plaintiff.

**H. Appointment of Special Counsel** — Appoint a special counsel pursuant to the Court’s inherent authority and applicable statutes to investigate the misconduct of federal and state officials named herein, including unlawful surveillance, obstruction of justice, and conspiracy with foreign adversaries.

**I. Production of Surveillance Warrants** — Order production of all FISA applications, warrants, or related authorizations that were used to conduct electronic surveillance or computer intrusions against Plaintiff, including any orders obtained fraudulently or under false pretenses.

**J. Attorneys’ Fees and Costs** — Award Plaintiff his reasonable costs and, where permitted by statute, attorneys’ fees under 18 U.S.C. §§ 1964(c), 2333, 2520, 1030(g), and other applicable provisions.

**K. Pre- and Post-Judgment Interest** — Award interest on all sums awarded at the maximum rate permitted by law.

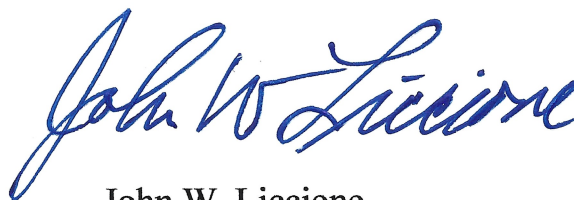
**L. Any Other Relief** — Grant such other and further relief as this Court deems just and proper.

**VI. REQUEST FOR JURY TRIAL**

Plaintiff demands a jury trial on all issues so triable.

Date: September 16, 2025

Respectfully submitted,



John W. Liccione,  
Plaintiff, Pro Se  
PO Box 229  
Dunedin, FL 34697  
jliccione@gmail.com  
443-698-8156

# **EXHIBIT A**

FLORIDA ELECTION STATUTE 1S-2.043

Electronic File Reporting Relating to Vote-by-Mail  
Ballot Request Information and Early Voting Activity

Enacted June 23, 2022

**1S-2.043 Electronic File Reporting Relating to Vote-by-Mail Ballot Request Information and Early Voting Activity.**

(1) General applicable provisions. This rule establishes file format specifications, timelines and other content requirements for the electronic compilation, transmission and reporting of vote-by-mail ballot request information and early voting activity. The Supervisors of Elections are responsible for ensuring that the files required under this rule are created or converted into a tab-delimited text file and that the files are transmitted successfully and timely to the Division of Elections.

(2) Definitions. For purposes of this rule:

(a) "FVRS" refers to the Florida Voter Registration System.

(b) "Supervisor" refers to the county Supervisor of Elections.

(c) "Division" refers to the Division of Elections.

(d) "Election," except as otherwise expressly stated, means primary and general elections (held in even-numbered years), presidential preference primary elections, and special elections held pursuant to Section 100.101, F.S. This rule does not apply to municipal, local referendum, or special district elections.

(e) "Standing request" means a vote-by-mail ballot request on file from a voter that serves as a request to receive a vote-by-mail ballot for all elections occurring from the date of the initial request through the end of the calendar year for the next regularly scheduled general election, and for which the supervisor has yet to determine if the voter is eligible to vote a vote-by-mail ballot in the election.

(3) Vote-by-mail ballot request information files.

(a) Compilation. For each election as defined in paragraph (2)(d), the Supervisor shall compile daily an electronic file that contains the most current information and vote-by-mail ballot request status for each eligible voter in the applicable election. The file shall contain all vote-by-mail ballot requests, but only one record per voter. Each day's file shall be a complete replacement of the previous day's file as it relates to the vote-by-mail ballot status for each voter who has requested a vote-by-mail ballot for the applicable election (i.e., the latest status of the voter's vote-by-mail ballot request shall replace an earlier status of the request). The Supervisor shall create a separate file for each election. The file shall be in the format specified in paragraph (c).

(b) File Transmission. The Supervisor shall electronically transmit the vote-by-mail ballot request information file described in paragraph (a) to the Division on a continuous daily basis including weekends no later than 8 a.m., in the time zone of the Supervisor's office of the day after the day being reported. The daily file shall be transmitted even if there is no new information or activity to report for the applicable election during the required transmission period.

1. For the presidential preference primary election, the first file shall be transmitted 60 days before the election and the last file transmitted on the 15th day after the election.

2. For the primary and general elections, the first file shall be transmitted 60 days before the primary election and the last file transmitted on the 15th day after the general election.

3. For a special election, by operation of Section 100.191, F.S., the first file shall be transmitted 60 days before the special primary or if the order calling for the special election occurs less than 60 days before the special primary, no later than two business days after the Division provides the Supervisor the election identifications for the special primary and special election, and the last file transmitted on the 15th day after the special election.

(c) File specifications.

1. Each file shall be created or converted into a tab-delimited text file.

2. Quotes shall not be used to enclose alphanumeric data.

3. For each registered voter's record, the address included shall be the mailing address on the voter's record to which the voter has requested the ballot to be sent.

4. The file shall not contain any information protected from public disclosure under federal or state law including any information protected pursuant to Section 97.0585, F.S., relating to Florida driver license, state identification and/or social security number, Sections 119.071(4)(d)1.-2., F.S., relating to high-risk professionals, and Section 119.071(5), F.S., relating to social security numbers. An \* shall be placed in any field within the file where the information is not included due to it being protected from public record disclosure.

5. The Supervisor shall provide the information for each record as specified in Form DS-DE 145 (<http://www.flrules.org/Gateway/reference.asp?No=Ref-14393>, eff. 06/2022).

6. File names shall adhere to the following convention:

a. Three character county identifier followed by underscore.

- b. Followed by three character file type identifier followed by an underscore ('VBM' = Vote-by-Mail Request List).
- c. Followed by FVRS election ID followed by an underscore.
- d. Followed by Date Created (format YYYYMMDD) followed by an underscore.
- e. Followed by Time Created (format HHMMSS).
- f. Followed by '.txt'.
- g. Example: LEO\_VBM\_10217\_20140810\_001000.txt.

(d) Public access.

1. Any person or entity authorized under Section 101.62, F.S., may access online daily county files of vote-by-mail ballot request information as directly received from the Supervisor and posted on the Division's website. In order to access this information, a person or entity authorized under Section 101.62, F.S., must first submit an online request application at: <https://countyballotfiles.floridados.gov/Account/Register>, Form DS-DE 146, Application to Obtain Vote-by-Mail Ballot Request Information (<http://www.flrules.org/Gateway/reference.asp?No=Ref-14394>), eff. 06/2022.

a. The Division shall then assign a login account. Authorization for access is only valid through the earlier of the end of the general election year in which authorization was initially granted or until the person or entity is no longer statutorily entitled to the information, whichever is applicable.

b. All login accounts for access automatically expire at the end of each general election year and if the person or entity remains eligible and wishes to receive the information for future elections, the person or entity must reapply.

2. An individual voter requesting access to his or her personal vote-by-mail ballot request information must obtain such information directly from the Supervisor of his or her county of residence.

(4) Early voting activity files.

(a) Compilation.

1. Early voting summary file. During each day of the early voting period, the Supervisor shall make available the total number of voters casting a ballot at each early voting location during the previous day.

2. Early voting voters list file. For each election as defined in subsection (2), the Supervisor shall compile and make available an electronic file that contains in accordance with the specifications in paragraph (c), a list of the individual voters who cast a ballot at each early voting location for the election up through the last day being reported.

(b) File transmission. The Supervisor shall transmit to the Division the early voting voters list file in subparagraphs (a)1. and 2., by 8 a.m., if practicable, but no later than 12:00 noon in the time zone of the Supervisor's office of the day after the day being reported. The files shall be sent daily even if there is no new information or activity to report. The first files shall be sent the day after the early voting period begins and the last files shall be sent the day after the early voting period ends for that respective election in that county.

(c) File specifications.

1. The files shall be created in or converted into a tab-delimited text file format.

2. Alphanumeric data shall not be enclosed in quotes.

3. The files shall not contain any information protected pursuant to an exemption requested under Sections 119.071(4)(d)1.-2., F.S. An \* shall be placed in any field within the file where the information is not included due to it being protected from public record disclosure.

4. Information required by statute and any other information for the each record shall be submitted in the format specified in Form DS-DE 147 (eff. 12/13/2015) (<https://www.flrules.org/Gateway/reference.asp?No=Ref-06151>).

5. File names shall adhere to the following convention:

a. Three character county identifier followed by underscore.

b. Followed by three character file type identifier followed by an underscore ('EVL' = Early Voting List).

c. Followed by FVRS election ID followed by an underscore.

d. Followed by Date Created (format YYYYMMDD) followed by an underscore.

f. Followed by Time Created (format HHMMSS).

g. Followed by '.txt'.

h. Example: LEO\_EVL\_10217\_20140810\_001000.txt.

(d) Public access. The Division shall post the files as received during the requisite reporting period to its public website.

(5) All forms mentioned in this rule are incorporated by reference and are available by contacting the Florida Department of

State, Division of Elections, R. A. Gray Building, 500 South Bronough Street, Tallahassee, Florida 32399-0250, (850)245-6200, or by access to the Division website.

*Rulemaking Authority 20.10(3), 97.012(1), 101.62(3), 101.657(2) FS. Law Implemented 101.62, 101.657 FS. History—New 2-4-10, Amended 10-27-10, 12-13-15, 6-23-22.*

# EXHIBIT B

Vote-by-Mail Ballot Request Information File Layout  
(For use when preparing and reporting the electronic data for vote-by-mail voters)

Data Element Name	Description	Data Format Rules
RecordType	Vote-by-Mail Ballot Request Status	“VBM”
CountyId	County providing summary	Char(3) Use FVRS county codes
VoterIdNumber	FVRS Voter Id Number	Numeric (10)
ElectionNumber	FVRS Election identifier	Numeric (10)
ElectionDate	Date of the election	MM/DD/YYYY
ElectionName	Name of Election	Char(35)
LastRecordChangeDate	Date the vote-by-mail summary record was last updated	MM/DD/YYYY
VoteByMailStatus	<p>Applicable codes to record status of voter’s request for reporting purposes.</p> <p><b>C:</b> Use when a voter cancels a request for vote-by-mail ballot, the voter moved out of county before the ballot is provided to the voter, or the voter votes in person instead.</p> <p><b>E:</b> Use when there is any voter-caused error or eligibility issue in a returned vote-by-mail ballot other than missing signature, mismatched signature or untimely returned ballot which shall be recorded separately under the applicable codes of “N”, “X” or “L”, respectively. Examples of voter errors or eligibility issues include no certificate envelope, challenged voter, party change after deadline, or voter no longer a resident of county by time ballot received.</p> <p><b>L:</b> Use when ballot is returned untimely and not counted.</p> <p><b>N:</b> Use when a voter returns a vote-by-mail ballot with no signature on the Voter’s Certificate or the signature cure affidavit, and/or fails to provide requisite ID with affidavit to cure the omitted the signature.</p> <p><b>P:</b> Use when the vote-by-mail ballot is provided to the voter by any proper means of delivery (mail, in-person, email, or fax, as applicable and authorized by law, <i>etc.</i>). (Only record one ballot provided per voter.)</p> <p><b>R:</b> Use when it is determined that the voter who has made a one-time request or has a standing request is eligible to vote-by-mail for the upcoming election and the request is readied for delivery (mail, email, fax, or in-person pick-up, <i>etc.</i>). This code is also used if the voter has requested a vote-by-mail ballot after the deadline for a vote-by-mail ballot to be mailed. Once the vote-by-mail ballot is provided to the voter, the status must be recorded as “P”. If the voter never picks up the requested ballot, then the code remains R.</p> <p><b>S:</b> Use when a voter has or makes a request to receive a vote-by-mail ballot for all elections occurring from the date of the request through the end of the calendar year for the next regularly scheduled general election. (Once the supervisor determines that the voter is eligible to vote-by-mail in a particular election, the status of the standing request for that election must be recorded as “R”.)</p> <p><b>U:</b> Use when a vote-by-mail ballot is returned as undeliverable to the address where it was sent.</p>	<p>Char(1)</p> <p><b>C:</b> Cancelled by the Voter</p> <p><b>E:</b> Voter Error or eligibility issue</p> <p><b>L:</b> Returned untimely</p> <p><b>N:</b> Unsigned</p> <p><b>P:</b> Provided</p> <p><b>R:</b> Requested</p> <p><b>S:</b> Standing</p> <p><b>U:</b> Returned Undeliverable</p> <p><b>V:</b> Returned and voted timely</p> <p><b>X:</b> Mismatched signature</p>

	<p><b>V:</b> Use when a voted vote-by-mail ballot is returned and received timely in the supervisor’s office and does not otherwise fall into a status code of E (Voter Error), N (Unsigned), U (Undeliverable) or X (Mismatched signature).</p> <p><b>X:</b> Use when a voter returns a vote-by-mail ballot with a mismatched signature on the Voter’s Certificate or the signature cure affidavit, and/or fails to provide requisite ID with affidavit to cure the signature mismatch.</p> <p><b>NOTE:</b> The code for each voter shall be updated daily so that each voter has only one code associated with the voter’s record. For example, a prior report for a voter reflecting an “S” will be changed on a subsequent report to an “R” if the voter is determined eligible to vote in the election. The reporting code for that voter may then be changed, for example, to “P”, which may then be subsequently changed to a status of “E”, “L”, “N”, “U”, “V”, or “X”.</p>	
RequestDate		MM/DD/YYYY
Delivery Date		MM/DD/YYYY
BallotReturnDate	Overseas ballots received during the 10-day period after Election Day for a presidential preference primary or general election shall be recorded with a return day of Election Day if the ballot counted.	MM/DD/YYYY
RequestCanceledDate		MM/DD/YYYY
Military		Char (1) Y, N
OverseasFlag		Char (1) Y, N
Military Dependent		Char (1) Y, N
Precinct		Char (6)
PrecinctSplit		Char (10)
CongressionalDistrict		Numeric (2)
SenateDistrict		Numeric (2)
HouseDistrict		Numeric (3)
CountyCommissionDistrict		Char (10)
SchoolBoardDistrict		Char (10)
OtherDistricts		Char (25)
Party		Char (3)
Voter Name		Char (99)
MailingAddressLine 1		Char (40)
MailingAddressLine 2		Char (40)
MailingAddressLine 3		Char (40)
MailingAddress City		Char (40)
MailingAddress State		Char (2)
MailingAddressZip		Char (15)
MailingAddressCountry		Char (40)
E-mailAddress		Char (100)
Faxnumber		Char (20)
DesigneeNameRequest	Designee, who can only be voter’s immediate family or legal guardian, making request on behalf of voter	Char (99)
DesigneeNamePickup	Designee, who may be someone other than immediate family, picking up ballot for voter	Char (99)

Voter FLDL/StateID	Y = information was provided; N = information was not provided.	Char (1)
VoterSSN4	Y = information was provided; N = information was not provided.	Char (1)