

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

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

v.

Case No.: 01-2026-CA-001794

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

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

COMES NOW, the Respondent, University of Florida Board of Trustees, a public body corporate of the State of Florida, et al. (the "University"), by and through counsel, and files this Response to *Verified Petition for Writ of Mandamus to Compel Compliance with Chapter 119, Florida Statutes, and Article I, Section 24, Florida Constitution, and for Attorney's Fees and Costs* (the "Petition") in the above-styled cause of action.

I. Introduction

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

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

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

II. Statement of the Case and Facts

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

Petitioner further specified:

This request is specifically directed at records maintained by, sent to, or received by employees within the UF College of Journalism and Communications, specifically including but not limited to the Brechner Freedom of Information Project, Dr. David Cuillier, and Professor Jane Bambauer.

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

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

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

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

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

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

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

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

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

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

³ See publicrecords.ufl.edu.

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

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

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

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

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

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

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

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

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

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

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

a. Petitioner Declined the Records he Now Seeks through Mandamus

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

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

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

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

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

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

⁸ Paragraph 27 states, with emphasis added: “Florida law recognizes no exemption permitting an agency to withhold non-exempt records based on the agency’s own subjective judgment of whether the records ‘relate to’ the requester. A record responsive to a properly framed request must be produced unless a specific statutory exemption applies and is asserted in writing. The University’s admission that it located responsive records and then declined to produce them because they ‘relate to individuals who are not’ Petitioner states no lawful basis for withholding.”

b. Some Records are not *Public* Records

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

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

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

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

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

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

a. Certification of Diligent Search

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

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

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

b. Privilege Log

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

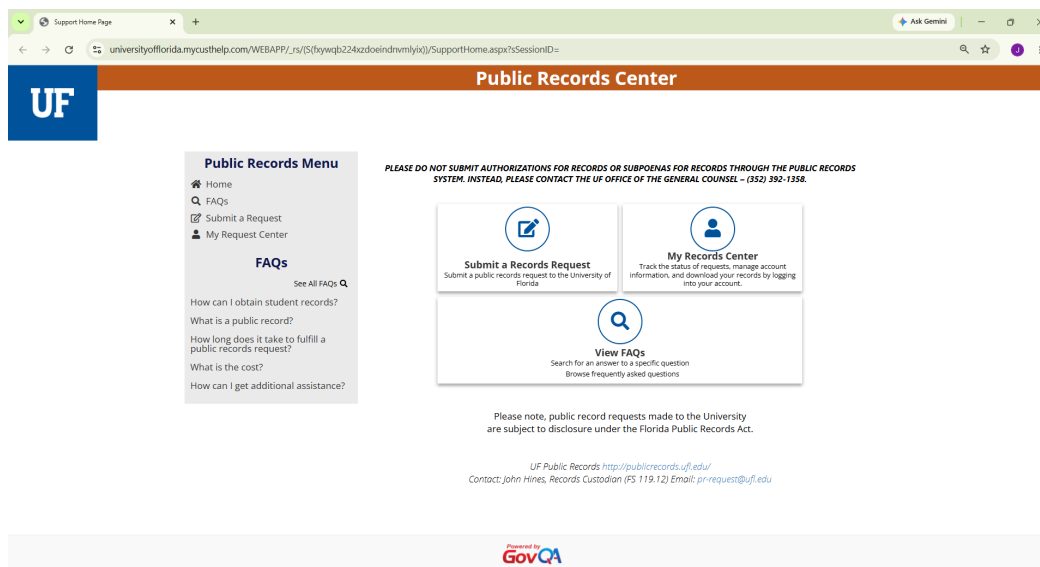
In any event, a privilege log, which is most commonly associated with civil litigation discovery, is a list of itemized documents withheld from production. Similar to a certification of diligent search, discussed previously, a privilege log is not mentioned in Chapter 119, nor is it recognized as part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

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

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

V. The University Properly Identified its Records Custodian

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



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

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

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

What is the custodian contact information for public records requests at the University of Florida?
UF Public Records <https://publicrecords.ufl.edu/> Contact: John Hines Records Custodian (FS...

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

[<< Back to Search Results](#)

Question:

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

Answer:

UF Public Records
<https://publicrecords.ufl.edu/>
Contact: John Hines
Records Custodian (FS 119.12)
Email: pr-request@ufl.edu
Office: (352) 392-1358

¹⁰ See (Aff. ¶ 3).

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

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

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

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

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

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

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

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

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

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

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

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

¹⁵ See Petition, pg. 7: “Under penalties of perjury, I declare that I have read the foregoing Verified Petition for Writ of Mandamus and that the facts stated in it are true and correct to the best of my knowledge and belief.”

VI. Conclusion

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

Respectfully submitted,

/s/ James W. Kirkconnell

James W. Kirkconnell, Esq.

Florida Bar No.: 0021044

123 Tigert Hall

PO Box 113125

Gainesville, FL 32611-3125

(352) 392-1358

(352) 392-4387 Facsimile

jameswk@ufl.edu

Attorney for the University of Florida

CERTIFICATE OF SERVICE

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

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

Exhibit A

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

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

v.

Case No.: 01-2026-CA-001794

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

Respondents.

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

STATE OF FLORIDA
COUNTY OF ALACHUA

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

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

Exhibit A

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

FURTHER AFFIANT SAYETH NAUGHT.

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

/s/ John Hines
John Hines