

STATEMENT REGARDING ORAL ARGUMENT

Appellants will gladly address this court face to face to: detail each issue; present facts; and answer any and all questions; if welcomed and allowed by this court.

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ARGUMENT

- I. Whether Townsend since 1987 or Appellants as Townsend elected F.S.6170834, speaks since 1993, especially after all the “Government Persons” omissions, “fraud, collusion and arbitrariness” all:
 - (1) are fully informed of the: (a) 2008 finding of this Eleventh Circuit Court of “Ineffective Counsels” Townsend connects and affirms all are “ineffective” since 1987; (b) Confirming 5th DCA 9/1/2006, Ruling in Robinson v. Weiland, Townsend found in 2011, confirming his opinion since 1992 of “Fraud on the Court” and Extrinsic Fraud; (c) the Florida Bar and the Florida Supreme Court in 2009, disbaring Counsel Heather Gray (disbarred¹ for frauds and abandoning clients rights) even herein as she was retained by Townsend to argue points validated per Robinson id. and admitting Townsend exposing Government Corruption and “Extrinsic” “Fraud on the Court” by Judges in collusion by “ineffective counsels in the Lane Gang Case” in constructive fraud with “Others” which is confirmed by the Florida SCt. Chief Judge Canady, 5th DCA, 2nd DCA and Judge Crenshaw all recused by Canady conceding in 2011, “Check Mate”; (d) finding of the FBCCP Membership in our termination of “sect” (members, pastors, others) for omissions, frauds and unjust enrichment since 1994 and a “failed building scheme” as Townsend alleged since 1996, but being impeded by “sect” Jeffers/Howlett deputies per Gibbs and Grant “Under Color of Law” as “trustees” and masked

as being “under color of law”, alleged lawful by their superiors and co-participants now exposed as corrupt, fraudulent, and unjustly enriched by the “sect” when the truthful FBCCP records revealed fraudulent creations of the “Sect” as exposed by the 2006 Court Order of biased “Scheming” Judge Crenshaw;

- (2) the length of this case again since the 2008 “ineffective ruling” back through these prejudiced judges (13th Circuit, 2nd DCA, 5th DCA, Florida Supreme Court) and reminders of these previous Florida Bar Complaints and Judicial Qualifications Commission Complaints since 1993 being now validated as Gang acts since Lane; it is proved this “ineffective counsel” is the intentional Mens Rea plot for “ineffective counsel” by Whistle Blower Townsend’s fired counsels (McCarthy, Landis, Popper, Chapin, Gibbs, Grant, Conner, Scruggs, Gray, Dickinson & Gibbons and “others” and the highest “State and Federal Government Persons”, “Alias Law Enforcers” and “others” as Defendant’s allege by: (a) Senator - Registered Agent Grant since 1994 and wrote in e-mails; (b) the hand written letter of Charlie Scruggs”; (c) the threat of the Florida Bar Officers, Boggs and Chinaris in 1999, saying, “If you ever get your law degree, within six months we will find a way to have you (Townsend) disbarred; or (d) after knowing Gray, sabotaged and abandoned her clients then a biased Judge Cook, “impeded” discovery, and “impeded” this case by frauds; (e) in 2010, again Grant like Jeffers threats since 1994, and Jeffers unlawfully trespassing Townsend 10/28/07, sending another e-mail with frauds reports to “Officers” and telling a conspiring Gee and State Attorney Ober to send “HCSO Special Deputies” to harass Townsend outside of their jurisdiction threatening saying: Stop filing lawsuits; Stop contacting Mr. Grant; Stop attending your Church; and Stop contacting your kids”; as each defendant in their individual and “gang” ways extort to never let Townsend as a non-lawyer Civilly or Criminally (1) discover truth to prove claims; (2) present truth of By-Laws violations and crimes to a jury or our Church; or look “honest” as a legal or ethical authority of his or “others” to his family, peers, and Church Members: Civil Business Rights; Civil Rights, His Church and Members Rights; (3) Never let Townsend Report Criminal Activities of Defendants and “Others Doe”; “honest Law Enforcers”, to a jury or to his “Church Members”;

(3) With “Government Persons” continue the “McCarthy, MacKay, McKay plot’s” conspired to conceal their malfeasance and thus abuse Townsend’s rights of “Discovery”; reputation, money and keep him from his business rights for over 5 years beyond the Joint Venture Contract(JV) from 1987-1993, resulting in the loss of all business by Counsels Torts and as they extorted and kidnapped his Children in 1999 by proved fabrication of evidence and prejudice from “Government Persons” to put Townsend in a “False Public Light” to Citizens whom Defendants and “Others” still conspire to deceive who also never had “Competent Counsel” for an “Honest Day” in: Civil Courts on issues since on or about 1987; or also by the conspiracy of these “Government Persons” intentionally doing “ineffective counsel” so to “impede” Townsend to never look “truthful” about reporting their Torts to FBCCP/CPCS as a Religious Society since 1994; as the 2008 Eleventh Circuit Court ruling was in a polite way admitting “ineffective counsel”, knowing violators may be or are involved in criminal acts now confirmed.

II. Under the law of Joint Liability, if this Honorable Eleventh Circuit Court found in 2008, in favor of Townsend and those for whom he speaks suffering “ineffective counsel” naming Counselors (Gray, Scruggs, Grant, Gibbs, Denny, Rolfes and “other DOE”) and F. SCt. Chief Judge Canady in 2011, admitted “Past” not Future “prejudice” causing Intrinsic, Extrinsic, Constructive and Collusion for “Fraud on the Court” from “ineffective counsel” and “fraud, collusion, and arbitrariness” with prejudiced Judges intentionally proved in constructive fraud against Townsend ET AL since 1987, therefore disqualified: himself in the persons now as Chief Judge over his Court and Agents and as a 2nd DCA Judge having serving in underlying case issues during the frauds of Gray not to reveal all prior attorneys and judges frauds and Denny’s Firm frauds in 02-03812 Townsend v. Beck Case; the 13th Circuit; the 2nd DCA; the 5th DCA; the entire Florida Supreme Court; and Judge Canady allowed a three judge panel to then dismiss the related case claiming “no jurisdiction” as a fault this Heather Gray was to honestly serve her clients writing an appeal covering all issues during her representation period of 3/14/2003, when she was immediately paid the full retainer she requested until her admitted abandonment about 8/2004, albeit the failure to do the promised services she made of 3/14/2003, show

abandonment of “honorable services even starting 3/14/2003, by her fraudulent inducement for her services she never intended to produce, how can Citizens not see this as constructive fraud of all “Government Persons” who block what is to be per our Florida Constitution Article I. Section 3, Jury issues, not Judge with “Government Persons” Collusion issues arbitrarily self empowering itself against Citizens Jury and innocent until proven guilty by a jury of ones peers rights as verses the unbiased ruling of the 7th Court of Appeals claiming basically if the Judge is Prejudice and in collusion then no Honorable Court or Day in Court ever existed?

- III. Whether the underlying criminal acts (Drug Use, Fraud(s), Extortion and Paying and expecting Kickbacks) by Charles E. Lane Jr. (a.k.a. Sabal Marketing Inc. and now Sealane Marketing Inc.) and the cover up of such “fraud, collusion and arbitrariness” by Townsend’s Counsels “Chapin’s/Popper/McCarthy’s and “others” Gang” is not an ongoing organized continuance of the original criminal felony acts and frauds by Lane and his childhood friend as his attorney Charles E. Williams Jr.(Williams) and their “Gang” which the victims herein have never had “Due or Equal Process” due to the Mens Rea Concert of Acts of Counselors McCarthy, Popper, Bruce E. Chapin (Chapin), David Gibbs III (Gibbs), John Grant (Grant), Cary Gaylord, Charles Scruggs III (Scruggs), Heather M. Gray (Gray), Dickinson & Gibbons ET AL (Denny and Rolfes) and “Others” in the highest levels of State (Governors, Supreme Court, Florida Bar Officers, FDLE) and Federal Government (Bush, Martinez and “Others”) who continue their “criminal enterprise” to never let Appellants have their Constitutional and Contract Rights as when one follows the money trail, Quid Pro Quo Acts and the “under color of law” political (MacKay’s/McKay Plot with Bar Officers as Chapins Plot with State Attorney McCarthy and “Others”) and “false light defamation” plot against Townsend as Townsend has “proved” truthfully advocated since 1987 and admitted by Defendants the Concert of Actions shows per the Robinson v. Weiland 5D05-2380 Ruling, the Mens Rea Criminal Minds and Constructive Extrinsic Fraud by “Fraud on the Court” even Appeals Courts first using P.C.A.’s to keep Appellants deprived of all Defendants and “Others DOE” per the Robinson rule and Canady’s Rulings not just “Fraud on the Courts” and Frauds on Appellants but Major Crimes and still in defiance to this Eleventh Circuit Court even ruling ENBANC.

- IV. Whether this trial Judge Kovachevich is as the other judges since Chief Ninth Circuit Judge Powell now named as Defendants in this case is acting fraudulently and “under color of law” and by bias (As Admitted by Rulings of Florida Supreme Court Chief Judge Canady, 5th DCA) likewise abusing her discretion as to what is “Short and plain” to conceal her co-participants verses “seeking justice” but instead continuing the RICO Quid Pro Quo Plot of these Defendants and “others” and violating the Constitutional Rights of these Appellants as each claim of Appellants has been “impeded” from our “Due and Equal Process”ⁱⁱ contract(s) and Constitutional Rights to our children, our property, our Religious Contract Rights, Civil Rights, “Discovery” and a “Jury Trial” since 1987 “impeded” by “alias” “honest services providing” “Government Persons” continuing to conceal themselves and “Others” Concert of Actions.
- V. Whether Judge Kovachevich is proving by her rapid Dismissal from the dates on the docket even seeming to file the Dismissal before Townsend’s deadline to file the Amended Complaint and wording of her Order she (as Appellants Allege because Townsend since 1987 refuses to: violate the law; fail to report violations of the law; and or take a bribe to conceal criminal actions of Lane and his co-participants, including Counsels, and Judges as this matter since 1987 is a “jury” issue) is continuing in defiance of this 11th Circuit Courts finding of “Ineffective Counsel” which specifically was advised to and advised to lower court Judge Cook knowing Gray was being disbarred since 2009, and even during Grays appearances during 8/2009 through 1/2010 in Case 06-6005, had agreed not to practice law since 8/2009 and also was in default as said by Judge Gomez in 2007, and then recused himself the second time acknowledging his Exparte “Fraud on the Court” collusion with Gray, Scruggs and “others” from his Orders from above, as now Judge Kovachevich with her Co-Participants as Judges of the 13th Circuit, 2nd DCA, 5th DCA, Florida Supreme Court and Middle District Tampa, intentionally continues the RICO, Anti-Trust, Extortion and Fraud Claims against Appellants by dismissing Appellants case prior to and or “impeding” Appellants “Discovery” as Judge Orfinger of the 5th DCA ruled 9/1/2006 as Judicial Error of Judge Powell’s “Gang” since 1990’s as those involved in this same case “impeding” the “Discovery” of personal and business records from Lane (a.k.a. Sabal, Sealane),

Appellants Counsel(s), Government Persons, FBCCP/CPCS and “others” and even what by law is to be “Public Disclosure” that Appellants alleged and have at later times proved connect the Mens Rea motives of Defendants concealing their malfeasance to Townsend and those for whom he speaks and Defendants paying and taking bribes, payoffs, Quid Pro Quo rewards and co-participating in criminal acts leading to the violation of FBCCP Contract and Religious and Civil Rights from the actions and Defamation of FBCCP Registered Agent Senator John Grant allegedly to Townsend and these Non-Sect Appellants giving us truthful legal advice yet as exposed by his E-Mails to the Sheriff and State Attorney verse the Orfinger Ruling a fraud as Townsend is now proved right of all his claims, but Grants “ineffective Counsel” to the FBCCP non-sect members since 1994 is leading to and then resulting in the kidnapping of Townsend’s children since 1999-now and depriving Civil and Contract Rights of FBCCP/CPCS and these Religious Society Members as Tax Payers still assisting Lane ET AL, Jeffers ET AL and their Co-Participants and thus giving these victimized Plaintiffs/Defendants/Respondents/Plaintiffs/Appellants no relief or restitution and no other remedy at law from ongoing deprivations as is it obvious to say it is fact that Scruggs, Gray, Denny, intentionally was advised to “impede” Townsend and those for whom he speaks as the first client Gray seems to “abandon” which then led to her for the State Attorney’s and Public Defenders office become the “Gray Hole” for many of their cases.

- VI. Whether these “Government Persons” violations can be solely Townsend issues or FBCCP issues or Citizens against Political Corruption Issues or must all be combined because these “ineffective counsel(s)” as a concert action “impeding” discovery of “Government Persons self dealing for their own interests”, McCarthy and Gray as State Attorneys, concealing Scruggs in a conflict of interest being paid by the same QUID PRO QUO Government Agents his co-defendants from City, County and State Funds, able to “impede”ⁱⁱⁱ Townsend’s claims, or Scruggs, Gray and Dickinson & Gibbons who if supporting Townsend’s Claims must betray their co-participants, or County Officers with personal motives (Linda Chapin, Pat Bean) or State Judges as recused Orders of F.S.Ct. Judge Canady including himself and Governors for their own agenda’s rewarding Townsend’s Counselors Chapins, (Linda to Clerk of Court), Gibbs, Conner with

Mel Martinez and “Others” and Jeb Bush using his brother George W. Bush and Conner’s former legal co-partner Martinez also former Orange County Chairperson, Director of HUD, U.S. Senator and now an executive with J.P. Morgan, to obtain “impeding” assistance of the Federal Agencies and FDLE Officers (Tunnell, Bailey) and Attorney’s Generals (Butterworth, Crist, McCollum, Bondi) or Florida Bar Officers or Federal Persons (Martinez and Robert O’Neill) or Sheriffs (Rice, Coats, Gee, White, Judd, Santa Rosa via Coats) concealing crimes being done by deputies (Jeffers, Howlett, Smoak, Corbin, Santa Rosa County) as proved with “singularity”, personal motives of prejudice even reversal of their other rulings proving their co-participants plot of “never let Townsend have an Honest day in court or have a jury trial or get discovery to prove Lane is from 1987-now: using money due to Townsend; participating in criminal acts of: drug abuse, extortion, bribery, kickbacks and multiple frauds; being kidnapped from his children since 1999 by the now former wife, Karen Harrod Townsend and her maternal family of which her brother Steven, an employee of J.P. Morgan Companies; non-production of Lane/Sabal, FBCCP, CPCS, SunBelt Records); loss of Townsend’s incomes by torts (Lane, Popper, Chapin and “others”); thefts of FBCCP Designated Funds; attempted murder; batteries; abuses and infliction of emotional distress on children and the elderly.

- VII. Whether this Court will stand by its 2008 Ruling of “Ineffective Counsel” and thus Order Appellants Demands for: Records Production; Writs; Arrest Warrants on Defendants and “Others DOE”; Restoration of our Property, Civil Rights; Jury Trial of all Issues judged as our By-Laws and Constitutions require of our peers; when “Government Persons” are proved to violate “Free Will Baptist” Law by “fraud, collusion and arbitrariness^{iv}” still Breaching our Contracts; Unlawfully Invade our Privacy and Take our Property and threaten us with arrest if we use our First Amendment Rights of Speech and Assembly.
- VIII. Whether this Court will let stand “Undue Process” of “Government Persons” in collusion using fraud for self-dealing, invasion of privacy, unlawful search and seizure to conceal their crimes and other violations of Contracts, Rules of Civil Procedure, Civil and Criminal Laws knowing their superiors will rule PCA without explanation as now it is well proved in this case the “PCA” was used for fraud of

“Government Persons”, unconstitutionally deceiving citizens per the intent of the voters of Florida based on “Government Persons” deception in their interpretation to restructure the courts for a more streamline system now however shown verses the use of Jenkins v. State or without legal “Due Process” to “impede” discovery of fraud for a Superior Court to aid and abet corruption of “Government Persons” from whom they received Quid Pro Quo unjust enrichment.

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STATEMENT OF JURISDICTION

This court has appellate jurisdiction pursuant to 28 U.S.C. 1291 and 28 U.S.C. 1294 because the decision from which the appeal is taken is claimed as a final decision of a district court from a judge or judges proved in self-dealing, prejudice, collusion, fraud and arbitrariness on honorable courts located within the U.S. Eleventh Circuit trying to conceal their frauds and the frauds of others in this country insulting the integrity of Honorable Courts of this Country and Citizens.

STATEMENT OF THE ISSUES

1. Whether Townsend or those for whom he was elected by his Church to

Speak as F.S.617.0834, these Appellants ever had “effective” counsel from 11/87, day one; or because of “Ineffective Counsels” torts not to get as Townsend demanded Subpoena’s for the JV Contract and a Court Appointed Receiver to fully expose the crimes of the illegal Lane “Gang”; have Prejudiced Lawyers, Judges, Government Persons and Others conspired to conceal their resulting unjust enrichment, constructive frauds and Fraud on the Court and Fraud on the Church Members/Tax Payers.

The 7th Circuit Court^v says if the judge is prejudice and involved in the fraud it is an Extrinsic and Constructive “Fraud on the Court” as the Judge is not the “Court” but only an officer of the Court.

The Orfinger reversal shows our highest level of Government Persons have ordered Townsend’s judges and Counselors to or of own their own choice seeking a Quid Pro Quo reward did Fraud on the Court and Extrinsic Fraud concealing their Government Superiors and other Co-Participants crimes.

The U.S. Supreme Court in the Watergate issues showed President’s are not above the law and the political/criminal “Plot” he concealed to protect the politics of brother Jeb was also as Jeb condemned on Television with Townsend rebuking these Harkness Bar Officers he then joined in 1994 and protected as Governor as authors of the ABA’s McKay Report showing

the “Risk” of their “McKay Plot” herein as condemned by *Keller v. State Bar of California* 496 US 1. (1990).

2. Due to the 14000 word limit on this Brief and since 1987 “intentionally ineffective counsel” to omit “Discovery” not all frauds of “Counsels” can yet exposed and thus a motive by “Government Persons” for their extortion to threaten Townsend and “others” as proved by the “Counsels” Gibbs, Grant, Scruggs, Denny’s letters and Gray actions of other Counselors and the “ignoring” of these felonies by their superiors to never let Townsend speak to his Religious Society members, his children, a Grand Jury or a Civil or Criminal Jury is proved as their Outrageous Obstruction of Justice Mens Rea Tort Actions.

STATEMENT OF THE CASE

1. President George W. Bush’s own words and actions are used as Claims of Appellants about what he said about his own “Undue and Unequal” actions concealing his brother Jeb being informed since 1994, and the “Jeb Gang including his Agents as Attorney’s Ken Conner, Mel Martinez, David Gibbs III, John Grant, Pam Bondi, FDLE, Sheriffs, at relevant times Charlie Crist and “his Gang”, State Attorney’s Officers Mark Ober, Patricia McCarthy (Townsend’s first counsel 11/1987) and others” needing Powerful Florida Republicans like Senator John Grant also aiding illegal “law

enforcers” masked as Under Color of Law “effective counsels” as Deputies Jeffers, Howlett and Smoak, and these others, violating Church members and their words against those of Iraq and Saddam defining Crimes, Fraud, Felonies of Government Persons and “others” that is beyond any logical belief and in 14,000 words fully detail since “discovery” is “impeded” since 1987 to not expose “intentionally” “ineffective counsel”, “kickbacks” and “Quid Pro Quo paybacks to these “Government Persons” concealing themselves for their enrichment and to stay out of jail as hypocritical thugs worse than the kidnappers they are as even imposters via Clergy/Deputies.

Even George W. Bush and his agents required Saddam to get a fair trial per the law because the world was watching but not herein because there is a “Politically Motivated” conspiracy by the Bush Brothers and their “Government Persons” to never let Townsend since 1987 to have a “jury” in our Courts and our Church to review the truth as publication of facts will show criminal acts concealing political contributions and kickbacks used as “Witness Tampering” and extortion on Church members and tax payers because at all costs since 1987, make Townsend as a liar.

2. Even Florida Attorney’s General Pam Bondi in her RNC skit on 8/29/2012, makes the same Argument Townsend has made since 1987, that Appellants are oppressed of our “Free Will” by frauds of “Government” yet

when Townsend speaks “Government Persons” lie all the more and kidnap his kids since 1999, still use false detainment and falsehoods in a “Public light” since 1987. All citizens are victims.

3. Townsend timely as he has done since 1987, reporting criminal acts to “alleged” “Honorable” Government employees filing Townsend ET AL v. Gray ET AL Federal case. Yet “prejudiced” Judge Kovachevich by rapid dismissal and without Ordering “Discovery” as required even per the Robinson ruling vindicating Townsend since 1987, reveals her biased “ineffective counsel” and joins others of the “Government Gang” in collusion to “impede” “Honest Services” to honoring contracts, somehow in her biased mind “Under Color of Law” dismisses this complaint which connects “Government Persons” prejudice and violations of law against these victims as Townsend first reported to his first “ineffective counsel” McCarthy, in 1987, turned Assistant State Attorney, Townsend alleges to “impede” revealing her Malfeasance.

4. The questions are simple. With this Honorable Court (2008), Judge Moody (2007), Judges Orfinger and Crenshaw just one week apart 9/1-9/7/2006, and F.S.Ct. Chief Judge Canady then conceding “Check Mate” that Appellants never got honorable services from Counsels, Judges and “others” since 1987, as the 5th DCA in Robinson ruled specifically

vindicating Townsend since 1987, how can “Honorable” Government Persons let “Judge” Kovachevich make her fellow Judges words look like “Fools” to non-lawyers and allow Appellants to still be victimized knowing Appellants will never since 1987, or in the future see an “Honorable” Court in our Government or Church because “self dealing” planted “masked” “law enforcers” don’t obey our By-Laws and Laws.

STATEMENT OF THE FACTS

1. Two links to the betrayals to these Appellants seem to be counselors McCarthy since 1988 and Senator Grant a.k.a FBCCP Registered Agent since 1994, with his gang intentionally betrayed Townsend, CPCS Pastor Dr. John Berry and FBCCP member Taxpayers following our By-Laws, Laws and Truth. Townsend, the “Elephant size Skeleton” of their past who by exposing their Malfeasance destroys their “Public Light”.

Grant’s lies and E-Mails to Sheriff Gee, State Attorney Ober and Townsend including Townsend’s family threatens Townsend should be “mentally evaluated” and “Baker Acted”. (See Exhibits) Yet facts found by Judge Canady, 5th DCA in Robinson and our Church members firing employees for the “Thefts” and “Building Scheme Frauds” vindicate Townsend. However, the Grant Gang still impede our “Free Will” by “Prejudiced” Gee’s Gang bribing “alias” Judges, “Law Enforcers” or others.

2. Townsend proves Grants multiple opportunities of Frauds to impede:
 - A. “Church Supreme Courts” Ethics Investigation Townsend and Dr. Berry led trying to protect assets illegally taken from the Awana kids and CPCS when Administrator Nasworthy admitted in the 10/1994, Business Meeting the “Sect” Finance Committee violated By-Laws and possibly the IRS putting the Church, School and members at risk, verified by Mr. Horgan a C.P.A. in 2006, who said “it was so bad I pulled my kids from the school and split my C.P.A. firm with Mr. Janssen ”. Prejudiced Planted Judge Crenshaw, 9/7/2006, hearing Townsend while being rebuked for their “bribery” scheme to avoid “Joint Liability” for herself and co-conspirators to solely pin the blame on Beck said, Shut Up! “I am trying to get you a lot of money” so Townsend could not reveal their overall “McCarthy, MacKay, McKay, Bush ET AL’s, Grant’s Republicans Plots”. Her Ordered “partial records” to expose Becks credit cards finally produced after years of “Fraud, Collusion, and Arbitrariness” by “Plots” backfired;
 - B. Townsend’s legal Eminent Domain Position. Grant protected his “Bean/Norman Gang” from paying more damages because they had delayed FBCCP/CPCS Expansion by us not knowing what would be “taken”;
 - C. Exposure of Jeb Bush’s Political Corruption and Frauds Jeb learned from Townsend on TV in the 1994 Town Hall Meeting about Chapin’s Gang;

D. Exposure since 1994 of the frauds of Beck's "Sect" with Deputies (Jeffers, Howlett, Smoak) and "others" concealing truth and producing fraudulent reports to the FBCCP members are still proved as somehow a "F.S.775.03 a Benefit to Clergy" violation and benefited Grant as Business transcripts showed Grant got paid in 1999 for researching permit issues to make Townsend look like a "liar" but Financials showed no payments;

E. Exposure since 9/8/1999, the frauds of Karen Harrod Townsend that Townsend was "molesting and abusing her and their kids" and "Townsend was dangerous with Guns", an "Infidel" and needed psycho evaluations and being "Baker Acted" repeating what she was told to say 11/15/2001, by the Grant-Beck-Howlett-Ober "Gang" to Appellants and in Affidavits to Judges Palomino, Timmerman, Sierra, and Gomez which she recanted as frauds in her 12/2005 Affidavit to Judge Holder. She and her "Gang" lied and still conceal their child abuse, concealed by Dr. Lynn, Scruggs, Gee/Obers Gang, Scruggs/Gray Gang, DCF and "Others";

Doing these vile comments that caused Townsend Children's abduction since 1999, and crimes done in our Church because the Grant-Gibbs-Norman-Bean-Conner-Martinez-Jennings-Bondi-McCarthy-Crist-Bush Republicans had to Conceal what they knew Townsend knew about the Democrats Crimes of Chapin/Chiles/McKay Political Plots.

5. Appellants per “Whistle Blower” Townsend as honest members unanimously elected, F.S. 617.0834, in 1994, to the Officers Position of the First Baptist Church of Citrus Park and subsidiary ministry Citrus Park Christian School, (FBCCP/CPCS), “Supreme Court” as the Nomination Committee and having had the most self-taught expertise in the pending legal issues facing the FBCCP in the areas of their Eminent Domain Case was also unanimously nominated and elected as Long Range Planning Chairman per the Nomination of Retiring Pastor Warner and CPCS Principal Dr. Berry, as Townsend the younger man, to per the By-Laws: (1) do the Church/School “Mission Growth Plan” to 1. Build a larger Sanctuary. 2. Expand CPCS to the 12th Grade to educate and minister throughout the world. 3. Build a Retirement Complex; (2) then assist Dr. Berry stop the “Sect” and their actions that formed with the arrival of Elbert Nasworthy, new “pastors” Beck, Meister, Brown, with their “unlawfully appointed” Howlett gang and “Others” unknown illegally acting per the By-Laws and diverting funds without By-Laws reports and approval of the Members.

6. Appellants as FBCCP Members and some “Others” knew Townsend was also trying to get justice for his business Future Marketing for his family in legal matters stemming from a “Joint Venture” (JV) Business 8/7/1987, contract dealing had gone very wrong with a former partner Charles E. Lane,

Jr. a.k.a. Sabal Marketing being caught with drugs and doing extortion.

7. It is fraud to say that Townsend at any time, should be “impeded” from presenting our claims to a jury, church or our peers in a BOCC Meeting or:

- a. obtaining full production of documents for truth of his contract and illegal activity claims or from defending himself from Lane’s GANG Counter suit from 7/5/1988, or from later illegal torts and estopped claims of Lane with other defendants to expose Truth, Facts and illegal acts proved by illegal acts, extortion and Quid Pro Quo kickbacks and witness tampering in their collusion;
- b. his business rights with his clients due to an alleged non-compete clause with anyone including Lane or their former employer Nova Sales;
- c. assembly with his abducted against their will children since 10/20/1999, FBCCP/CPCS members since 9/8/1999, trying to gain relief from “Sectarian” criminal acts or business ventures since 1987, seeking to gain relief from RICO and “other Criminal Acts from “Lane’s Gang”, Joe Ligorì and “Others” (Townsend and Lanes former Boss at Nova Sales) and “others” able to do Quid Pro Quo Acts, “kickbacks”, RICO illegal interference with contracts and frauds;
- d. presenting these truths and obtain truthful records production of FBCCP Records since 1994 and related Business Records since 1987 to fellow

Church members or to a jurors of our peers to decide vindication and restitution of these Appellants and punishment of Defendants and “others DOE” for their concert of criminal actions even in the early 1990’s Popper called RICO of Lane, Williams, Ligori and “others” then.

8. As Federal Judge Moody Jr., in a Status Hearing on 3/15/2007, in the underlying case, said “Ineffective Counsel” yet now proved in this related case paraphrasing said,

“This case sounds like Undue and Unequal Process to me so go back (per Fed Rule 8) and give more details on each.”

Townsend, honoring what Judge Moody ruled and what this Eleventh Court said, Townsend included and informed the 13th Circuit Court Judges and Defendants through using the timely filed ongoing Townsend ET AL v. Gray ET AL Case 06-6005 now timely brought through the 2DCA, Florida S.Ct., 5th DCA, Florida S.Ct. and then to the Federal Middle District, Tampa.

9. The Undue and Unequal Process begins since 11/87, when “ineffective counsel” was given by Attorney Patricia McCarthy, and then to Popper and Chapin and to Scruggs and Gray and as Townsend demanded, “Get Subpoena’s on Lane so Townsend can read the “JV Contracts” to not do tort interference and Set up a Receiver so Townsend can get paid and know his Contract Rights. If Judge Moody gave his directive in light of him knowing

about the Robinson Ruling of 9/1/2006, confirming Townsend then the door that Judges Merryday, Wilson and now Kovachevich and “Others” tries to close shows fraud by those who “impeded” the Moody Ruling since 3/15/2007, by “Fraud, Collusion and Arbitrariness” the directives Townsend retained and paid McCarthy, Popper ET AL, Chapin ET AL, Gibbs ET AL, Grant ET AL, Scruggs, ET AL, Gray ET AL and “others” has yet to be done because it will:

- (A.) Confirm Townsend is truthful against Lane’s Gang and the FBCCP “Sect” and their “Government Agents”;
- (B.) Exposes and convicts Defendants of Felonies;
- (C.) “Ineffective Counsels” and “Other” Government Persons and non-Government Persons Criminal Acts” as Townsend has advised since 1987, per the JV Contract and the “witnesses” truthful testimony and per the FBCCP/CPCS By-Laws and per the Constitutions and Laws Defendants are subjected to all obey. Emphasis added.

Defendants make threats to “Shut Up”, since 1998, and then in 1999, threats from the Florida Bar and then the Church Sect, Don’t contact your kids or your Church, and what do Defendants and new judges fear other than the threats from their other Judges and Superior Officers?

10.Appellants timely come again via as Townsend alleges intentionally

unlawfully delayed all the more by ongoing acts McCarthy started with Townsend's other "ineffective counsels", "Government Persons" and Federal Judge(s) Merryday, Wilson, Conway, Presnell and back to Lower Court Judges and now Judge Kovachevich.

11. Their lie turns into a bigger lie by Townsend's Counselors McCarthy and Popper while at Austin Lawrence & Landis P.A. as skilled attorneys alleging to "Honestly Serve" Townsend began since about or before 11/1987, covering up their negligent counsel as they accepted the frauds and Black Law violations of Attorney Charles E. Williams, Jr. concealing "Lanes Gangs" illegal acts including kickbacks and witness tampering as confirmed by the McCarthy Letter to Popper of 3/8/1988, Exhibit E556 in Florida Bar Complaints **93-31, 690 and 691 and 692** and the Letter of Popper of 4/14/1988, and E-565, thus delaying Townsend still in 2012 getting Subpoena's and a Court Appointed Receiver on Lane as Townsend demanded in several verbal demands and written letters 5/26/1988, to these Counsels. McCarthy, Popper and then Williams adding Bruce E. Chapin and his wife Linda Chapin ET AL in 1989, and Gibbs III, since 1991 and Grant since 1994, and these other Defendants and "Others DOE" continuing to conceal their malfeasance in the representation of Townsend's Contract and Civil Rights in Townsend's upon learning of Lane and his "Lane's

Gang” being discovered in criminal drug use, since about 11/1987, thus resulting in deprivations against all Appellants for whom Townsend speaks.

12. Each of Townsend’s and or FBCCP “Alias Law Enforcers”, named Defendants and other co-participants has in these underlying court cases illegally in collusion with McCarthy-Grant-Gibbs ET AL and unlawfully by Deputy Jeffers acting outside his County authority with other “Law Enforcers” and their alias “Superior Officer” “impeded” Officer Townsend and the FBCCP Church Members reviewing FBCCP records of Nasworthy’s illegal “unjust enrichments” admissions since 1994 and the frauds in settling the Eminent Domain Case by frauds of the “Pastor Sect” and the frauds of Beck buying the 18105 North Gunn Highway 40 acres so as Beck admitted “live in the country like my brother Donnie and have more bathrooms for my daughters” and members specifically questioning multiple frauds including: Tax Evasion; Unjust enrichment; \$43,000.00 missing from the “Pastors Salary Fund” in 1998. This is the same “Law Enforcers” who when the Hillsborough Board of County Commissioners (BOCC) caught Pat Bean giving herself and staff “unjust enrichment” they fired them but being hypocrites denied our Members of the same right to “Discovery” and Termination of Law Enforcers who received the same benefits with her and Nasworthy. Also Commissioner Jim Norman under investigation by the

State Ethics Commission for not reporting income from what appears as bribes as claimed herein but FDLE mocked 4/10, “you’ll never get to connect that”. The Beck/Jeffers/Howlett/Smoak/Grant/Gibbs ET AL Deputies Gang trespassed Townsend from the FBCCP since 9/8/1999 and “Impeded”; Assembly of a Jury and even the Church Counsel as a Jury; Civil Rights; By-Laws; as full discovery of records Townsend is due per contracts and or from being a counter defendant/respondent from criminal allegations of these Defendants estopped from asserting any defense by their frauds to now Appellants which connects the money trail, unjust enrichment, extortion(s), continuing “under color of law” willful fraud(s) and omission of truthful disclosure even by “ineffective counsels” and “law enforcers” per Fed R. Civ. P. Rule 8(a) continuing the running of the statue of limitations and their “Other” Quid Pro Quo self-dealings Townsend claims and proves.

13. This Townsend ET AL v. Gray ET AL Federal case is the result of Townsend still lawfully and timely seeking not bribes but justice from a Jury per Florida Constitution Article I. Section 3., for himself and those who elected him to speak for them upon learning of the “ineffective counsel” ruling by this Eleventh Circuit, timely returned this ruling in the still pending Townsend ET AL v. Gray ET AL 06-6005, 13th Circuit, thus giving “Government Persons” the opportunity to still perform their Fiduciary and

Contract Duties. When Judge Canady recused them all at the State level, the case timely filed gets Judge Kovachevich.

Townsend the “Whistle Blower” refuses to take a bribe from Lane and in 1998, Popper and Chapin, and or after receiving confirmation of his claims as being lawful from the rulings of Crenshaw in 2006 (saying take this Summary Judgement against Beck and go after the others later and Shut Up I am trying to get you a lot of money), the 5th DCA 9/1/2006, and Fla. S.Ct. Canady in 2011, is still “impeded” from “Due and Equal Process” and restitution and relief and thus as victims of ongoing extortion and frauds.

14. Townsend timely filed: Townsend ET AL v. Beck ET AL Federal Case 8:06-cv-02050-T-23TGW; Townsend ET AL v. Gray ET AL 06-6005; and Townsend v. Gray ET AL Federal Case 8:12-CV-1198-T-17-EAK-EAJ; Appeal 12-13892-AA and Brief are timely filed.

15. Townsend alleges George W. Bush via Mel Martinez at HUD (2001-2005) empowered Chapin’s son Patrick through the Sarasota YMCA and the Sheriff Gee Programs to Quid Pro Quo deprive Appellants and fund the Bush’s Plot the Chapin’s could expose still ongoing.

15. The Statue of Limitations cannot expire per the 7th Court of Appeals and per this courts ruling of “ineffective counsels” “impeding” Townsend.

16. This Federal complaint based on “operational” conspiracy of Powell

knowing his co-participants would confirm him ruling Townsend did not:

“specify the fraud and explain why the fraud, if it exists, would entitle the movant to have the judgement set aside”...(Because appellant did not specifically plead the two grounds that would have formed a basis for relied-fraud and coercion—the trial court correctly dismissed the petition for failure to state a cause of action.”), rev. denied, 640 So2d 1107 (Fla. 1994). Affirmed. By Peterson, C.J., and Goshorn and Harris, JJ., concur.

17. After the 5/19/98, Judge Stroker hearing denying Chapin and Popper their fraud of “Business Loss Rule” they took Townsend to a local coffee shop and make a bribe saying we know we did you wrong but you just heard the judge and you will never prove it. You drop the case and we will pay you a finders fee for helping someone we know find restaurant locations. Then a threat of --you better take this offer or else.

18. This Honorable Court 2008 Ruling of “Ineffective Counsel” citing **Salinas v. U.S.**^{vi} said “Others” as Counsels not specifically naming, McCarthy, Williams, Landis, Popper, Chapins and “others Doe” because “Discovery” is still being “impeded” so victims come again to claim^{vii} to the court crimes by State and Federal employees.

19. Townsend with “clean hands” has verified proof by their admissions empowering this as an Honorable Court to bring “Disbarment”, “Firing” and Federal kidnapping Charges against Lane’s Gang from 11/87, “McCarthy- All “others”-Kovachevich Gang” RICO, since 1988 even telling the lower

Courts of this 2008 Ruling and proved the “Intentional self-dealing” as:
RICO; ANTI-TRUST; HOBBS ACT; BLACK LAW RULES; F.R.A.P.;
VIOLATIONS, MALICIOUS PROSECUTION, ABUSE OF PROCESS
AND POWER “Fraudulently Under Color of Law Operationally and
Arbitrarily”, Concert Of Action of “Unlawful Detainment of Contract,
Civil Rights and Extortion” as directed by Federal and State Officers and
F.S.Ct. “judges” who had not taken their oaths^{viii} of office still watching
lower Circuit Court Case^{ix} violating Our: By-laws; and Florida Bar Rules^x.
“Government Persons” have conspired to make Townsend the “liar in Public
light”, since 1987, but he has proved their fraud to deprive Plaintiffs to
deny us “Honest Services” (18 USC §1346), warrants Criminal Charges to a
Grand Jury by Frauds of Honest Services of Public Officials and Employees
doing Obstruction of Justice (18 USC §1341 and §1343 and §1503). Thus
the fact that this case has had to after the previous finding of this Court now
come back to this court the Racketeer Influence and Corrupt Organization
Act is proved by these Defendants and “Others Doe”.(18 USC §§1961-1968,
especially §1964 (c)). By the Conspiracy of “Government Officials” to
violate Civil Rights the Obstructions appear to be lead when Chapin used his
influences for the O’Neill, Chapin firm with himself and his wife and
included others like persons as Robert O’Neill since 1993 in the U.S.

Attorney's Office and DOJ Civil Rights Division. Also in keeping with the facts told to "Government Persons" at the time of the Chapin and Popper Bribes (5/98) hearing with "Judge" Stroker, "stop pursuing the case" and "find us restaurant sites". Robert O'Neill owning the Dublin Pub Inc causes suspicion as to why all these facts of crimes Townsend has proved have not received assistance from the U.S. Attorneys, DOJ, FBI, County and State Officers Gray was to advocate or now Judge Kovachevich is to prosecute.

20. JEB BUSH---Did The Quid Pro Quo appointing Crenshaw to the 13th Circuit overseeing 02-03812 who from 2003-9/2006 by her acts concealed the Bush's Plots using Townsend's information assisted both elections. Without Jeb as Governor, Katherine Harris may have conceded in 2000.

21. Charlie Crist for Quid Pro Quo, as Governor, appoints her to the 2nd DCA. and rewards Scruggs to Regional Counsel when legal experts know of their open criminal acts while Crenshaw, her husband (HCSO Deputy) and co-participants are "impeding", illegally by the ruling of Judge Orfinger on 9/1/2006 in this same related Townsend case block discovery by Plaintiffs, rule to allow Defendants to do "unlawful invasion of privacy", continue emotional distress, deprivations, impede Religious Society, Civil Rights so to continue at the operational directives of her Superiors and in self-dealing conflict of interest continue the conspiracy to "conceal and fix" this case as

admitted by Col. Gary Terry and Deputy Renato Martinez in 2007.

22. Crenshaw proved 5/10/2006, admitting the collusion of Defendants but trying to conceal the crimes caused only to Beck and not his co-participants illegal felonies and for over 3 hours rewriting the Malicious Prosecution Count and proofs as Townsend always alleged but had to recuse herself when directly confronted with her intentional fraud. The Crenshaw re-write used as a Template in 06-6005 to include all Defendants and “Others Doe” yet judges Cook at the directives of her co-participants ignores Crenshaw and that Gray is in Default and disbarred.

23. David Gibbs III, the CLA, Christian Law Association lawyer for the Bush Brothers in the Terry Schiavo case reverses his argument against Townsend Rights.

26. Charlie Crist had as his chief of Staff, now a 1st DCA Judge per Crist, Lori Sellers Rowe connected with Kmart Pharmacist Dr. Rowe-Campbell, at #3092 where Townsend was unjustly “fired” for racial frauds now proved frauds Grant created with defendants.

27. Judge Merryday, We now know by overwhelming evidence instead of recusal reversed himself to dismiss our case as his Aisenberg v. HCSO Rulings concealed the HCSO Terry, Gee and “Others” and their Co-Participants as Everett Rice, the same charged now in this Complaint.

28. Judge Wilson “impeded” Plaintiff hiring “counsel” by his refusal to grant discovery of FBCCP Records and Townsend’s control over money the Jeffers-Lane’s-Sunbelts Gang still divert.

29. Judge Cook worked for Bush, appointed (SC02-1213) and promoting herself of Bell Shoals Baptist Church where fellow member Sheriff Gee and even one time Nasworthy had a duty to recuse herself.

31. Federal Judge Conway knows her judges are continuing “FRAUD” and other RICO Crimes as Judge Presnell believed Townsend in the 1990’s.

32. U.S. Attorneys Officers, Robert O’Neill and their Superior Officers are exposed and connected as after gaining legal Rulings and admissions of U.S. Attorneys and F.B.I. persons who said they would originally help Townsend were soon after reassigned or fired, in the Bush U.S. Attorney’s scandal. FBI, Agent Gross and others and DOJ Agents have been repeatedly informed of the RICO Enterprise and Anti-Trust Monopoly.

33. Courts use **Jenkins**^{xi} and a P.C.A. out of context as a fraud to voters as an Anti-Trust Fraud based on the 3/11/1980, Citizens vote for restructuring the courts not collusion. Citizens in no way meant they gave up their rights to get a “fair day” in court protected Civil Right. The Robinson ruling confirmed Townsend claims of conspired acts of Powell, Popper, Chapins, Williams, Lane and “Others” in 1/1993 when the forced alleged “settlement”

was illegally done by Powell ET AL telling Townsend to take the \$5,000 settlement and get nothing for losing your business opportunities from 1987-1993, and beyond and “shut up” or “go to jail” resulting in 1994 Grant lying this was legal, to my wife, church and in 1999, abducting children per their extortion/ransom note^{xii} of 10/20/1999, validated by the Grant E-mails but overturned by Robinson, and Canady as Fraud on the court and Appellants file Complaint^{xiii} issues. See Exhibits.

SUMMARY OF THE ARGUMENT

1. Defendants President George W. Bush and Florida Attorney General Pam Bondi in her speech at the Tampa RNC, 8/29/2012, gives Appellants their Argument that each Defendant and “others DOE” have abused their discretion and violated standards and laws they say they will even follow or what is wrong with the Defendants and “Others Doe” since 1987.

President George W. Bush taught what was criminal about Iraq and Saddam but Bush not as herein even made sure Saddam got to speak and got a trial per the law.

2. Even the Pam Bondi, RNC, speech to justify her argument about the Oppression of President Obama that the voters are ignored and violated by a violation of “Due Process” and even required to accept something and then learn what was in it and after its exposure learn, of a taxing fraud. That

is the same argument Townsend from 1994-1999 and still is making on behalf of the FBCCP Corporation and Tax Payers and then when the Gang was caught in the \$43,000 fraud and fraud of “we will get permits for the school”, to shut Townsend up from presenting more facts and being vindicated to the taxpayers, Townsend was charged with Felonies and needing to be “mentally evaluated and Baker Acted” rather than let Townsend per the By-Laws and as a “taxpaying citizen” perform his “Church Supreme Court” Duties.

3. It is illogical not to think George W. Bush, was not advised of the earlier Supreme Court filings against Lane, Chapin, Popper and Williams and the collusion with Judges and the Orange County Commissioners of which he chose Mel Martinez did not pick up the phone and say Jeb, Ken or Mel, you talked to Townsend since 1994, what is this all about.

4. Scott, Bondi, Ober, Gee, Robert O’Neill, and our Federal Judges, Where are our “Government Persons” in this cause making sure Naïve Victim Citizens get a “fair or any jury trial” rather than let these alias “law enforcers” do the crimes and you give victims no relief when you know these Defendants have intentionally filed “False Reports” in what are to be Honorable Courts since 1988 by allowing the “Sham” Lane Counterclaim based on no evidence ever supporting Lane, Williams or “others” but by

RICO Bribes otherwise have no reason to support Lane other than the Clients were told frauds by the Lane Gang Townsend could not “work” from 1988 until 1993.

5. Excluding the mass murders or Weapons of Mass Destruction albeit the frauds since 1987 have had the same destruction as Florida is the most corrupt state for citizens trying to be civil, all of the other Saddam corruption is done by these “Government Persons”, Defendants and “others DOE” on a “Religious Society” and naïve Citizens.

6. These few of these Saddam acts are: Treason to the Due and Equal Process, Civil Operation of our Constitutions; Unlawful Detention and Abduction of persons, Business Rights and Property Rights; Destruction of Religious Societies Freedom of Worship per our By-Laws; Destruction of Families; Unlawful Interference and Abduction of Children from parents; Attempted Murder; Abuse and Frauds on minors through to the elderly; Batteries by Law Enforcers “Gangs” and “Others”; Violations of Civil Rights as Speech, Assembly, Worship, holding Church Officer and teaching positions and Voting and Voting without frauds; Tort Interference with Business Relations; Illegal Tax evasion; Kickbacks; RICO; Anti-Trust; Illegal Detainment; Concealment of Corrupt Politicians and other “Government Persons” by Concealment of what is to be Public Records;

Extortion; Obstruction of Justice and more. Townsend at multiple and various times has since 1987, proved a complete legal case on the Concert of Actions began by the Frauds of Lane and his "Lane Gang" to conceal his criminal acts (Drug Use, Extortion, Paying Kickbacks, Witness Tampering) leading to all these other Crimes known to our "Government Persons" since the first meeting with McCarthy in 11/1987, as she wrote in 3/1988, yet our "Government Persons" will not allow the "Government Veil" or the Corporate Veil of: Lane ET AL. since 1987; FBCCP/CPCS since 1994; Sunbelt since 1999; Kmart/Sear since 2005; to be exposed as all along the way Townsend will be vindicated and the falsehoods, defamation's and damages as expressed in Grant e-mail's and Karen Harrod Townsend claims filed with the courts (case 01-15814, 02-4974,) alleging the frauds of Grant about Townsend, proved to have continued the deprivations.

7. All Judge Kovachevich is doing is trying to unlawfully "impede" more production to prove Townsend is right since 1987 about the corruption of Lane and those who received Quid Pro Quo rewards for their ignoring our Laws and Contracts.

8. Judge Kovachevich is bold enough to ignore: what seems per her actions to be meaningless rulings of this 11th Circuit Court of Appeals in 2008; the conceding and admitting "Check Mate" by Judge Canady then

recusing the lower courts and himself; the 5th DCA Robinson Ruling confirming what Townsend exposed to Judge Powell in 8/11/1994, known to him prior to his Final Judgement Order of 8/19/1994, as the Chapin ET AL Plot was clearly pled and exposed as the 5th DCA on 9/1/2006, confirmed the legal position of Townsend as did Judge Crenshaw 5/10/2006--9/7/2006, yet when Townsend refused another "Government Persons" bribe, she and her co-participants had to dismiss the case to conceal productions of their ongoing Concert of Illegal Actions all things a disbarred Gray was to plead.

9. So the question is when Townsend or any citizen dials "9-11", can we trust any "Government Person" to honor our laws per the Oath they took? It appears not in Florida or Washington D.C. per facts proved in this case or in what these defendants and "others" do to families who become unwilling victims of DCF, HUD, DOJ and these defendants.

10. Lane still advertises on his Sealane company web page he has the Foster Grant Sunglass Line which per the exhibits herein he got from Townsend by torts of lawyers, so to not expose their Torts they told Townsend to "Do Not discuss Lane to the Clients" and "Do not Contact the Lines or take Clients" and "Do not take your commissions or payments for your services to them directly from them" or you will violate the Non-Compete and also be charged by the Chief Judge Powell criminally with "Witness Tampering".

11. Even 3/16/1990, Lane offered a “Mutual General Release, Non Disclosure Agreement and Settlement Offer” agreeing to pay Townsend \$8,000.00. Their bribe was even increased but was well short of what Chapin said was owed or what any jury verdict Townsend would have gained due to the production of truth to a jury knowing what is now proved by the evidence these Counselors and Others continue to “impede”. Townsend refuses the Bribery of “Lane Gang” and gave \$20,000 to Chapin for a Trial on the Merits. Popper claimed if Townsend took the settlement he could then legally just restart his business, but that was a lie. When asked in 1993, after \$45,000 was gone verses the original \$12,000 per Popper who was going to pay me for not doing business from 1987-1993, Chapin and Popper took the 5th and Judge Powell’s Gang with “others” still lets that question not be answered.

12. Even in 1/1993, Townsend objected to the threats, bribery, extortion of the “ineffective counsels” and from prejudices Quid Pro Quo rewarded Judge Powell to show your records, take the \$5000 or go to jail and Townsend still timely files complaints to alias “law enforcers”.

13. In 9/7/2006, Townsend objected to the extortion of the “ineffective counsels” and from prejudiced Quid Pro Quo Crenshaw saying “shut up, I am trying to get you a lot of money” but Townsend demands as since 1987,

expose all Lane's Gangs Records and have per our Constitutional Right a "jury trial" on all civil and criminal issues.

14. Until the 9/1/2006, written Order of Judge Orfinger as vindication of Townsend, not discovered until 2011, Townsend and those for whom he speaks were and still are without trust in our leaders, emotionally distressed and in fear by the way defendants and "Others DOE" acted and still acts in blatant defiance of our laws and now even more as we understand the continuing corruption being extended by the ruling of these Middle District Judges after being informed of these deprivations and even most of these defendants admitting their criminal acts.

15. By the Chapin's (Bruce, Linda, Patrick) and their "Gov. MacKay Gang Plot" since 1989, able to be aided and abetted by the Highest Level of Democrats and "Others" and Jeb Bush since 1994, being aided and abetted by the Highest Level of Republicans and "Others" each as Politicians and as "Government Persons" have violated and are depriving Townsend and those for whom he speaks just as President Bush and Pam Bondi in other cases for Citizens say they would not do and Honorable Serving Leaders.

ARGUMENT

1. Appellants never asked to be detained or done fraud to practicing their "Free Will"^v but since the 8/7/1987, Joint Venture and the "Hate Crimes"

and collusion by “Government Persons” allegedly “Under Color of Law” we have and had our kids, integrity, rights and property unjustly taken.

2. Per the 7th Circuit Court of Appeals in Kenner v. C.I.R., 387 F.3d 689, (1968); 7 Moores Federal Practice, 2d ed., p. 512, ¶ 60.23, states “a decision produced by fraud on upon the courts is not in essence a decision at all, and never becomes final.”...”Fraud upon the court makes void the orders and judgements of that court.” A judge taking a bribe or acting with prejudice can be convicted of intentionally doing fraud in a case inside his own court. So in this case only 18th Circuit Judges Muszynski and Davis and Federal Judge Moody, Jr. (when asked to resign he admitted a conflict of interest regarding his golfing buddy Judge Holder having testifying for him in the Florida Supreme Court Plagiarism Case) are exempt as each other judge clearly knew their roles in the frauds started by the Lane “Gang” and each did a tort of fraud to continue the prejudice and conspiracy. And as

Townsend quoted in his 1/21, 1999, Supplemental Authority to the 5th DCA, “34. AM Jur. P. 188 Section 231, the author says,

“Fraudulent concealment of a cause of action from the one in whom it resides, by the one against who it lies, constitutes an implied exception to the statute of limitations. Emphasis Added.”

3. The Grant E-Mails, Scruggs letter, and these enormous files shows Counsels true demented Mens Rea motives, frauds, “Hate Crimes” and

“fraudulent services” Grant gave from 1994, and Scruggs from 7/2000 giving false counsel as Townsend wrote his Pro Se cases also misrepresented by Gray, disbarred for criminal acts as done on Townsend ET AL.

4. The statements and representation of Gibbs for Bushs, Crist, Conner and “Others” even having the matter presented on the floor of Congress in the Terry Schiavo Case clearly show his hypocritical argument that the Church Rights were stronger than the States Rights to destroy the family relationship of Terry and her family when all knew they were aiding and abetting “Government Persons” as Jeffers, Corbin, Howlett, Smoak, Registered Agent Grant ET AL aiding and abetting “alias” “clergy” as the “Beck Gang” to destroy the Church Families and do frauds to the Religious Society and to the Citizens in the frauds of the Eminent Domain Case and since 1994 violation of By-Laws just as ruling in Umberger v. Johns and “Free Will”. Additionally per Florida Statues: §768 these Defendants knew their actions were “Intentional Torts”; violations of §498(Florida Uniform Land Sales Practices Law), §517 (Florida Securities and Investor Protection Act), §542 (Florida Antitrust Act of 1980), §895 (Florida Racketeer Influenced and Corrupt Organization Act) [§768.81(4)(b) Fla. Stat.]. The collusion to extort Townsend to limit his claims only to Beck, by the collusion of Judge Crenshaw and Dickinson & Gibbons and their “Gang” in 2006, in Townsend

v. Beck 02-03812, Townsend viewed as a fraud, extortion, a bribe, and a violation of Florida Constitution Article I. Section 3, as a matter of public importance a Jury of Citizens must know of all the crimes and the damages by all their “Government Persons”. Production of all records Townsend has demanded from the “Gangs” since 1987 is necessary for a lawful determination of each participants role in the Theories Under with Joint Liability is Imposed. Of the four types: Vicarious, Derivative, independent tort and civil conspiracy appear to apply to all Defendants and “Others DOE” but more production is necessary to complete a full case or defense based on the allegations that Townsend as a non-lawyer is in need of being “Baker Acted” and suffering from a mental breakdown thinking the whole world is against him if one takes the position of Karen Harrod Townsend, the “alias clergy” even said from a pulpit and the attorneys Scruggs and Grant per their letters and e-mails.

5. While Crenshaw even wrote during an over 3 hour hearing 5/10/2006, a Malicious Prosecution Count in collusion with Denny and their co-participants against Beck and then sought to have Townsend shut up, she could she could not allow Townsend to plead the six parts of a Malicious Prosecution Count as this would show joint liabilities of them all going all the way back to the conspiracy began by these McCarthy “ineffective

counsels” to conceal their conspiracy and torts and “Lanes Gangs Torts”.

6. Thus even though the template of Crenshaw was justly used in the Third Amended Townsend v. Beck 02-03812 case it had to be shut down without discovery by Crenshaw and her co-participants and by a backdated Dismiss Order by Judge Barbas not even known to Denny. Even the Gray (06-6005) after providing proof Gray was disbarred for intentional misconduct and torts done to her clients Townsend ET AL, Judge Cook had to shut down the case without discovery. The same pattern of conspiracy exists from Powell through now to Judges of the Middle District of Tampa now in 2012.

7. The “State and Federal Government Persons” shows their hypocrisy while aiding and abetting the “Lane Gang” by their what may have happened “Private Bar” reprimands against Popper, Chapin and Williams and Others and then the concealment of the “Jeffers/Beck Gang” and then the Public “Disbarment of Gray” yet they shut down Townsend showing the “Ineffective Services” of Gray was the same of them all. When one reviews how each of these law firms have split it is clear they are trying to avoid joint liability. The Florida Bar as specifically ignoring Townsend’s Amicus Brief^{xiii} regarding the Disbarment of Gray in light of these same facts as Judge Orfinger and the 5th DCA and the ruling of judge Crenshaw in 2006 (9/1 and 9/7) clearly shows their hypocrisy to say one thing and then violate

their own laws and rules just to continue to damage Townsend and any honesty and truth Townsend states per the laws and facts.

Per Florida Bar v. Ellis Rubin 549 So2d 1000 (Fla.1989) case shows Florida Bar Officers and Members in conspiracy to deceive a non-lawyer Jury of Fact Finders and Townsend alleges herein proves the “McKay” Plot found per Keller id. per the U.S. Supreme Court and the ABA unacceptable.

If fraud to a jury is acceptable in our courts Citizens should know not to trust the Judge or Lawyers from both sides. However, per our FBCCP By-Laws which all defendants herein must not “impede”, fraud is not allowed from 1994, estopping Jeffers/Grants Gang participants who violates our By-Laws.

- I. Whether Townsend since 1987 or Appellants as Townsend elected F.S.6170834, speaks since 1993, especially after all the “Government Persons” omissions, “fraud, collusion and arbitrariness” all:
 1. are fully informed of the: (a) 2008 finding of this Eleventh Circuit Court of “Ineffective Counsels” Townsend connects and affirms all are “ineffective” since 1987; (b) Confirming 5th DCA 9/1/2006, Ruling in Robinson v. Weiland, Townsend found in 2011, confirming his opinion since 1992 of “Fraud on the Court” and Extrinsic Fraud; (c) the Florida Bar and the Florida Supreme Court in 2009, disbaring Counsel Heather Gray (disbarred^{xiv} for frauds and abandoning clients rights) even herein as she was retained by Townsend to argue points validated per Robinson id. and admitting Townsend exposing Government Corruption and “Extrinsic” “Fraud on the Court” by Judges in collusion by “ineffective counsels in the Lane Gang Case” in constructive fraud with “Others” which is confirmed by the Florida SCt. Chief Judge Canady, 5th DCA, 2nd DCA and Judge Crenshaw all recused by Canady conceding in 2011, “Check Mate”; (d) finding of the FBCCP Membership in our termination of “sect” (members, pastors, others) for omissions, frauds and unjust enrichment since

1994 and a “failed building scheme” as Townsend alleged since 1996, but being impeded by “sect” Jeffers/Howlett deputies per Gibbs and Grant “Under Color of Law” as “trustees” and masked as being “under color of law”, alleged lawful by their superiors and co-participants now exposed as corrupt, fraudulent, and unjustly enriched by the “sect” when the truthful FBCCP records revealed fraudulent creations of the “Sect” as exposed by the 2006 Court Order of biased “Scheming” Judge Crenshaw;

- (2) the length of this case again since the 2008 “ineffective ruling” back through these prejudiced judges (13th Circuit, 2nd DCA, 5th DCA, Florida Supreme Court) and reminders of these previous Florida Bar Complaints and Judicial Qualifications Commission Complaints since 1993 being now validated as Gang acts since Lane; it is proved this “ineffective counsel” is the intentional Mens Rea plot for “ineffective counsel” by Whistle Blower Townsend’s fired counsels (McCarthy, Landis, Popper, Chapin, Gibbs, Grant, Conner, Scruggs, Gray, Dickinson & Gibbons and “others” and the highest “State and Federal Government Persons”, “Alias Law Enforcers” and “others” as Defendant’s allege by: (a) Senator - Registered Agent Grant since 1994 and wrote in e-mails; (b) the hand written letter of Charlie Scruggs”; (c) the threat of the Florida Bar Officers, Boggs and Chinaris in 1999, saying, “If you ever get your law degree, within six months we will find a way to have you (Townsend) disbarred; or (d) after knowing Gray, sabotaged and abandoned her clients then a biased Judge Cook, “impeded” discovery, and “impeded” this case by frauds; (e) in 2010, again Grant like Jeffers threats since 1994, and Jeffers unlawfully trespassing Townsend 10/28/07, sending another e-mail with frauds reports to “Officers” and telling a conspiring Gee and State Attorney Ober to send “HCSO Special Deputies” to harass Townsend outside of their jurisdiction threatening saying: Stop filing lawsuits; Stop contacting Mr. Grant; Stop attending your Church; and Stop contacting your kids”; as each defendant in their individual and “gang” ways extort to never let Townsend as a non-lawyer Civilly or Criminally (1) discover truth to prove claims; (2) present truth of By-Laws violations and crimes to a jury or our Church; or look “honest” as a legal or ethical authority of his or “others” to his family, peers, and Church Members: Civil Business Rights; Civil Rights, His Church and Members Rights; (3) Never let Townsend Report Criminal Activities of Defendants

and “Others Doe”; “honest Law Enforcers”, to a jury or to his “Church Members”;

- (3) With “Government Persons” continue the “McCarthy, MacKay, McKay plot’s” conspired to conceal their malfeasance and thus abuse Townsend’s rights of “Discovery”; reputation, money and keep him from his business rights for over 5 years beyond the Joint Venture Contract(JV) from 1987-1993, resulting in the loss of all business by Counsels Torts and as they extorted and kidnapped his Children in 1999 by proved fabrication of evidence and prejudice from “Government Persons” to put Townsend in a “False Public Light” to Citizens whom Defendants and “Others” still conspire to deceive who also never had “Competent Counsel” for an “Honest Day” in: Civil Courts on issues since on or about 1987; or also by the conspiracy of these “Government Persons” intentionally doing “ineffective counsel” so to “impede” Townsend to never look “truthful” about reporting their Torts to FBCCP/CPCS as a Religious Society since 1994; as the 2008 Eleventh Circuit Court ruling was in a polite way admitting “ineffective counsel”, knowing violators may be or are involved in criminal acts now confirmed.

8. Townsend is never lawfully removed as the FBCCP Supreme Court F.S.617.0834 Superior officer or Member per the 1993 By-Laws or Florida law in effect on 9/8/1999, as since 1994, tells our Paid lawyers “law enforcers/Government Persons” Paid Employees and Members, as their Respondent Superior and herein respectfully reminds this court, Defendants are criminally in violation of our By-Laws, U.S. Constitution, Florida Constitution, Black Law Rules, Laws and their employment contracts and we want our Kids, Integrity, Rights, property and money back. Due to the law of “Free Will”^v now proving the “Fraud, Collusion and Arbitrariness”, Townsend per F.S.493, F.S.775.87, and as State law F.S.120.69(1)(b)(c)

Administrative Procedures Act request our Superior Officers of this 11th Circuit Court to assist us to insure our contracts and law is followed and To require answers:

(1) ask why so late in 2006, with Judge Powell and others who were prejudiced in 1992-then to resurrect such an old case and expose “law enforcers” as having ruled in prejudice to continue the Plot to “impede” discovery exposure; (2) as a non-lawyer to ask who caused and why was the reversal of Judge Orfinger and the attempt by the State Courts and Judges Merryday, Wilson and Kovachevich to still delay “discovery” and vindication for Plaintiffs who continue “impeding” by Outlandish frauds by “Deputies” and co-participants since 1994 and “Willfully” “Ineffective” Counsel since 1987 as the Orfinger reversal proves collusion and frauds.

(2) Per the Law and our By-Laws Superior Officer Townsend has steadfastly said despite being rebuked as a “liar” needing “Baker Acted” by Grant: The Finance Committee did frauds in 1994 per the By-Laws and therefore crimes; Don’t hire Karen Jeffers as Principal as Townsend questioned then is she a plant used by the “Sect” and Sect Agents for crimes as now we prove she is; Don’t take the Eminent Domain Settlement based on the Pat Bean surprise of a Judge Powell Case; Don’t buy the 18105 Gunn Highway Property; In 1999, Show me the money trail on the \$43,000.00

and all the records since 10/1994; The 9/8/1999, "Sect" acts and other acts were illegal; the 10/20/1999, abduction of my kids was illegal; the Awana kids and CPCS kids in 1999, were abused; the counsel since Gibbs, Grant and "others" as counselors is not lawful or per the By-Laws; the "impeding" of discovery is violation of our By-Laws contracts and laws; Townsend being detained since 9/8/99, or trespassed on 10/28/2007, after the promises of "Gee" that month not to get involved and sending his deputies to threaten in 2010, was crimes and frauds (just as Gee said of Chief Abbott); e-mails of Grant are extensions of the frauds since 1994 and before; Lanes Gang and My Employee Government Officers do criminal acts aiding and abetting Lane; and other issues stated throughout these cases included herein and as a Unprotected Respondent by "Prejudiced" Popper with "Judges" ET AL's criminal charges against Townsend being essentially "Baker Acted" and "Illegally Detained" from his Business since 1987, and kids and Church since 1999, Townsend for all demands discovery by requesting honorable "Judicial Notice" of all issues.

II. Under the law of Joint Liability, if this Honorable Eleventh Circuit Court found in 2008, in favor of Townsend and those for whom he speaks suffering "ineffective counsel" naming Counselors (Gray, Scruggs, Grant, Gibbs, Denny, Rolfes and "other DOE") and F. SCt. Chief Judge Canady in 2011, admitted "Past" not Future "prejudice" causing Intrinsic, Extrinsic, Constructive and Collusion for "Fraud on the Court" from "ineffective counsel" and "fraud, collusion, and

arbitrariness” with prejudiced Judges intentionally proved in constructive fraud against Townsend ET AL since 1987, therefore disqualified: himself in the persons now as Chief Judge over his Court and Agents and as a 2nd DCA Judge having serving in underlying case issues during the frauds of Gray not to reveal all prior attorneys and judges frauds and Denny’s Firm frauds in 02-03812 Townsend v. Beck Case; the 13th Circuit; the 2nd DCA; the 5th DCA; the entire Florida Supreme Court; and Judge Canady allowed a three judge panel to then dismiss the related case claiming “no jurisdiction” as a fault this Heather Gray was to honestly serve her clients writing an appeal covering all issues during her representation period of 3/14/2003, when she was immediately paid the full retainer she requested until her admitted abandonment about 8/2004, albeit the failure to do the promised services she made of 3/14/2003, show abandonment of “honorable services even starting 3/14/2003, by her fraudulent inducement for her services she never intended to produce, how can Citizens not see this as constructive fraud of all “Government Persons” who block what is to be per our Florida Constitution Article I. Section 3, Jury issues, not Judge with “Government Persons” Collusion issues arbitrarily self empowering itself against Citizens Jury and innocent until proven guilty by a jury of ones peers rights as verses the unbiased ruling of the 7th Court of Appeals claiming basically if the Judge is Prejudice and in collusion then no Honorable Court or Day in Court ever existed?

9. Yes, Per the rule of Joint Liability, each Defendant and “others DOE” can liable based on the evidence presented to this 11th Circuit Courts finding. As victims the 11th Circuit Court has the authority to Order Contempt on Defendants and Grant relief and or also return all issues to an impartial lower court judge to insure Appellants get all Discovery and then can lawfully submit the case to a jury for findings of said Jury on issues all back to 1987. Until full discovery is obtained and is presented, a jury then determines the fault and degree of damages to each.

III. Whether the underlying criminal acts (Drug Use, Fraud(s), Extortion and Paying and expecting Kickbacks) by Lane Jr. (a.k.a. Sabal Marketing Inc. and now Sealane Marketing Inc.) and the cover up of such “fraud, collusion and arbitrariness” by Townsend’s Counsels “Chapin’s/Popper/McCarthy’s and “others” Gang” is not an ongoing organized continuance of the original criminal felony acts and frauds by Lane and his childhood friend as his attorney Charles E. Williams Jr.(Williams) and their “Gang” which the victims herein have never had “Due or Equal Process” due to the Mens Rea Concert of Acts of Counselors McCarthy, Popper, Bruce E. Chapin (Chapin), David Gibbs III (Gibbs), John Grant (Grant), Cary Gaylord, Charles Scruggs III (Scruggs), Heather M. Gray (Gray), Dickinson & Gibbons ET AL (Denny and Rolfes) and “Others” in the highest levels of State (Governors, Supreme Court, Florida Bar Officers, FDLE) and Federal Government (Bush, Martinez and “Others”) who continue their “criminal enterprise” to never let Appellants have their Constitutional and Contract Rights as when one follows the money trail, Quid Pro Quo Acts and the “under color of law” political (MacKay’s/McKay Plot with Bar Officers as Chapins Plot with State Attorney McCarthy and “Others”) and “false light defamation” plot against Townsend as Townsend has “proved” truthfully advocated since 1987 and admitted by Defendants the Concert of Actions shows per the Robinson v. Weiland 5D05-2380 Ruling, the Mens Rea Criminal Minds and Constructive Extrinsic Fraud by “Fraud on the Court” even Appeals Courts first using P.C.A.’s to keep Appellants deprived of all Defendants and “Others DOE” per the Robinson rule and Canady’s Rulings not just “Fraud on the Courts” and Frauds on Appellants but Major Crimes and still in defiance to this Eleventh Circuit Court even ruling ENBANC.

10. Yes all things are related.

IV. Whether this trial Judge Elizabeth Kovachevich is as the other judges since Chief Ninth Circuit Judge Rom Powell now named as Defendants in this case is acting fraudulently and “under color of law” and by bias (As Admitted by Rulings of Florida Supreme Court Chief Judge Canady, 5th DCA) likewise abusing her discretion as to what is “Short and plain” to conceal her co-participants verses “seeking justice” but instead continuing the RICO Quid Pro Quo Plot of these

Defendants and “others” and violating the Constitutional Rights of these Appellants as each claim of Appellants has been “impeded” from our “Due and Equal Process”^{xv} contract(s) and Constitutional Rights to our children, our property, our Religious Contract Rights, Civil Rights, “Discovery” and a “Jury Trial” since 1987 “impeded” by “alias” “honest services providing” “Government Persons” continuing to conceal themselves and “Others” Concert of Actions.

11. Yes. The Judge is required to recuse themselves in the event prejudice may be believed or alleged. The goal of a judge is to be impartial, apply our laws and contracts (the FBCCP By-Laws) and as our employee seek justice.

V. Whether Judge Elizabeth Kovachevich is proving by her rapid Dismissal from the dates on the docket even seeming to file the Dismissal before Townsend’s deadline to file the Amended Complaint and wording of her Order she (as Appellants Allege because Townsend since 1987 refuses to: violate the law; fail to report violations of the law; and or take a bribe to conceal criminal actions of Lane and his co-participants, including Counsels, and Judges as this matter since 1987 is a “jury” issue) is continuing in defiance of this 11th Circuit Courts finding of “Ineffective Counsel” which specifically was advised to and advised to lower court Judge Martha Cook knowing Gray was being disbarred since 2009, and even during Grays appearances during 8/2009 through 1/2010 in Case 06-6005, had agreed not to practice law since 8/2009 and also was in default as said by Judge Gomez in 2007, as now Judge Kovachevich with her Co-Participants as Judges of the 13th Circuit, 2nd DCA, 5th DCA, Florida Supreme Court and Middle District Tampa, intentionally continues the RICO, Anti-Trust, Extortion and Fraud Claims against Appellants by dismissing Appellants case prior to and or “impeding” Appellants “Discovery” as Judge Orfinger of the 5th DCA ruled 9/1/2006 as Judicial Error of Judge Powell’s “Gang” since 1990’s as those involved in this same case “impeding” the “Discovery” of personal and business records from Lane (a.k.a. Sabal, Sealane), Appellants Counsel(s), Government Persons, FBCCP/CPCS and “others” and even what by law is to be “Public Disclosure” that Appellants alleged and have at later times proved connect the Mens Rea motives of Defendants concealing their malfeasance to Townsend and those for

whom he speaks and Defendants paying and taking bribes, payoffs, Quid Pro Quo rewards and co-participating in criminal acts leading to the violation of FBCCP Contract and Religious and Civil Rights from the actions and Defamation of FBCCP Registered Agent Senator John Grant allegedly to Townsend and these Non-Sect Appellants giving us truthful legal advice yet as exposed by his E-Mails to the Sheriff and State Attorney verse the Orfinger Ruling a fraud as Townsend is now proved right of all his claims, but Grants “ineffective Counsel” to the FBCCP non-sect members since 1994 is leading to and then resulting in the kidnapping of Townsend’s children since 1999-now and depriving Civil and Contract Rights of FBCCP/CPCS and these Religious Society Members as Tax Payers still assisting Lane ET AL, Jeffers ET AL and their Co-Participants and thus giving these victimized Plaintiffs/Defendants/Respondents/Plaintiffs/Appellants no relief or restitution and no other remedy at law from ongoing deprivations as is it obvious to say it is fact that Scruggs, Gray, Denny, intentionally was advised to “impede” Townsend and those for whom he speaks as the first client Gray seems to “abandon” which then led to her for the State Attorney’s and Public Defenders office become the “Gray Hole” for many of their cases.

12. ANSWER---- YES.

VI. Whether these “Government Persons” violations can be solely Townsend issues or FBCCP issues or Citizens against Political Corruption Issues or must all be combined because these “ineffective counsel(s)” as a concert action “impeding” discovery of “Government Persons self dealing for their own interests”, McCarthy and Gray as State Attorneys, concealing Scruggs in a conflict of interest being paid by the same QUID PRO QUO Government Agents his co-defendants from City, County and State Funds, able to “impede”^{xvi} Townsend’s claims, or Scruggs, Gray and Dickinson & Gibbons who if supporting Townsend’s Claims must betray their co-participants, or County Officers with personal motives (Linda Chapin, Pat Bean) or State Judges as recused Orders of F.S.Ct. Judge Canady including himself and Governors for their own agenda’s rewarding Townsend’s Counselors Chapins, (Linda to Clerk of Court), Gibbs, Conner with Mel Martinez and “Others” and Jeb Bush using his brother George W. Bush and Conner’s former legal co-partner Martinez also former Orange County Chairperson, Director of HUD, U.S. Senator and now

an executive with J.P. Morgan, to obtain “impeding” assistance of the Federal Agencies and FDLE Officers (Tunnell, Bailey) and Attorney’s Generals (Butterworth, Crist, McCollum, Bondi) or Florida Bar Officers or Federal Persons (Martinez and Robert O’Neill) or Sheriffs (Rice, Coats, Gee, White, Judd, Santa Rosa via Coats) concealing crimes being done by deputies (Jeffers, Howlett, Smoak, Corbin, Santa Rosa County) as proved with “singularity”, personal motives of prejudice even reversal of their other rulings proving their co-participants plot of “never let Townsend have an Honest day in court or have a jury trial or get discovery to prove Lane is from 1987-now: using money due to Townsend; participating in criminal acts of: drug abuse, extortion, bribery, kickbacks and multiple frauds; being kidnapped from his children since 1999 by the now former wife, Karen Harrod Townsend and her maternal family of which her brother Steven, an employee of J.P. Morgan Companies; non-production of Lane/Sabal, FBCCP, CPCS, SunBelt Records); loss of Townsend’s incomes by torts (Lane, Popper, Chapin and “others”); thefts of FBCCP Designated Funds; attempted murder; batteries; abuses and infliction of emotional distress on children and the elderly.

12. NO. All issues are related through Lane’ gang, McCarthy, Gibbs, Grant, Beck ET AL and Harrods and a jury is per the law to determine liability and damages.

VII. Whether this Court will stand by its 2008 Ruling of “Ineffective Counsel” and thus Order Appellants Demands for: Records Production; Writs; Arrest Warrants on Defendants and “Others DOE”; Restoration of our Property, Civil Rights; Jury Trial of all Issues judged as our By-Laws and Constitutions require of our peers; when “Government Persons” are proved to violate “Free Will Baptist” Law by “fraud, collusion and arbitrariness^{xvii}” still Breaching our Contracts; Unlawfully Invade our Privacy and Take our Property and threaten us with arrest if we use our First Amendment Rights of Speech and Assembly

13.ANSWER---Only this court knows.

VIII Whether this Court will let stand “Undue Process” of “Government

Persons” in collusion using fraud for self-dealing, invasion of privacy, unlawful search and seizure to conceal their crimes and other violations of Contracts, Rules of Civil Procedure, Civil and Criminal Laws knowing their superiors will rule PCA without explanation as now it is well proved in this case the “PCA” was used for fraud of “Government Persons”, unconstitutionally deceiving citizens per the intent of the voters of Florida based on “Government Persons” deception in their interpretation to restructure the courts for a more streamline system now however shown verses the use of Jenkins v. State or without legal “Due Process” to “impede” discovery of fraud for a Superior Court to aid and abet corruption of “Government Persons” from whom they received Quid Pro Quo unjust enrichment.

14.The Court should rule they used dismissals without required Recusals who then fraudulently use P.C.A. based on Jenkins v. State^{xx} as illegal and unconstitutional as a conspired fraud for extrinsic fraud these victims and for a Fraud on the Honorable Courts these Tax Payers to have and Trust from our “Government Persons” our Employees unjustly enriching themselves by extortion.

15.Therefore this Honorable Court to protect the Honor of the Court should Order Defendants to produce: the Townsend kids J.D.T and J.G.T to their father; all records per the demands of Townsend still fulfilling F.S.617.0834. That the U.S. Marshal arrest each Defendant for Obstruction of Justice and as an accessory to kidnapping and other charges as seems just and pending discovery.

CONCLUSION

1. All lower judges orders are null and void as prejudiced fraud on the

Court or Reversal is required and also those of Judge Kovachevich per the “suspicious” Docket as 20 July 2012 and dated: “4 June 2012, Docket 3, Endorsed Order striking the original complaint”; “21 June 2012, Docket 5, Stricken Pursuant to 6 Endorsed Order Amended Complaint against Ronald. L Beck, Heather M. Gray (Attorney at Law)...” This Order strikes the timely filed order of 50 pages or less by 6/19/2012 Amended Complaint inferring that the Amended Complaint filed with the Clerk and other multiple copies were date stamped by the Clerk on June 19, 2012 at 2:55; “21 June 2012, Docket 4, Endorsed Order dismissing case for failure to prosecute pursuant to 3 Order directing plaintiff to file amended complaint. No timely amended complaint was filed.” “25 June 2012, Document 6, Endorsed Order striking the complaint filed in this case as it does not in any way comply with the requirements and rules of this court. The plaintiff well knows this as his previous attempts to file such an outlandish complaint all resulted in dismissal of his case...” 9 July 2012, Docket 7, ENDORSED ORDER denying 7 Motion for recusal.; denying 8 Motion for reconsideration. Signed by Judge Elizabeth A. Kovachevich on 7/9/2012.” Said Motions for recusal and Motion for reconsideration were directed not to Judge Kovachevich but to Chief Judge Conway allowing the Court to correct its own “judge” and arrant ways as to be in compliance with

Orders of our 11th Circuit Court, F.S.Ct. Judge Canady and 5th DCA Judge Orfinger per 9/1/2006, that until “full discovery” as Townsend paid McCarthy/Popper/Chapin/Gibbs/Grant/Scruggs/Gray/Dickinson & Gibbons and FBCCP paying “other” and Citizens paying “all law enforcers” to do is allowed for Plaintiffs/Defendants/Respondents now as ongoing victims of Illegal Seizure being aided and abetted illegally by these Government Persons to unlawfully obtain victims property no court can honorably discharge the claims made by Townsend since 1987 attempting to receive “Equal Process” per Judge Moody Jr. 3/15/2007 and Unbiased Counsel from now Federal Judge Gregory Presnell and “Others”. These “ineffective counsel” and “others” were paid for their “Honorable Services” per their promise to render said services yet in their McCarthy, MacKay, McKay Plots/Criminal Enterprise still “impede” Townsend reviewing Business Records of Lane ET AL or what per the By-Laws is Public Records of FBCCP/CPCS or SunBelt or Kmart/Sears or Dr. Lynn medical records of the Townsend Children.

2. Federal or State Officers per the 7th Court is bound to: require Appellants “discovery” and a “fair trial” by a jury of our peers; issue disbarments against “Bar Members” and “others”; issue charges against Defendants and “others DOE” for crimes concealing Lane’s Gang.

3. Townsend has standing. Supreme Court ruled any parent regarding their rights to their children can be Pro Se to argue their right to the court and herein it is a religious right for Townsend per F.S.617.0834, Representative for members “due process” per contracts and to be made “whole” from frauds deceiving all the clients of their children and property.

ⁱ Florida Bar v. Gray SC09-1121, July 2009, Gray agreed not to practice law. Judge Cook ignored her plea bargain and Judge Gomez ruled Default in 2006.

ⁱⁱ Federal Judge James Moody Jr. March 15, 2007, at a status hearing questioning Townsend with regarding what was believed at that time in the underlying cases.

ⁱⁱⁱ “Impede” throughout this document is referred to from the U.S. and Florida Constitutions showing Rights that “No Law shall impede the obligation of a contract” yet these Persons under contracts have breached their Oath and Fiduciary Duties.

^{iv} First Free Will Bap. CH. Of Blountstown, Inc. v. Franklin, ET AL. 4 So. 2d 390, 148 Fla. 277...”The law appears to be settled that in the absence of a showing of fraud, collusion or arbitrariness on the part of the church authorities having jurisdiction of the controversy, the courts will not interfere...”

^v Levine v. United States, 362 U.S. 610, 80 S.Ct. 1038 (1960), citing Offutt v. United States, 348, U.S. 11, 14, 75 S.Ct. 11, 13 (1954). “A judge receiving a bribe from an interested party over which he is presiding, does not give the appearance of justice.” “Recusal under Section 455 is self-executing; a party need not file affidavits in support of recusal and the judge is obligated to recuse herself sua sponte under the stated circumstances. Taylor v. O’Grady, 888 F. 2d 1189 (7th Cir. 1989). Further, the judge has a legal duty to disqualify himself even if there is no motion asking for his disqualification. The Seventh Circuit Court of Appeals further stated that “We think that this language [455(a)] imposes a duty on the judge to act sua sponte, even if no motion or affidavit is filed.” Balistreri, at 1202.

People v. Zajic, 88 Ill.App.3e477, 410 N.E.2d 626(1980) A judge in not the court but is an officer of the court just as an attorney is an officer of the court.

Bulloch v. United States, 763 F.2d 1115, 1121 (10th Cir. 1985), the court stated “Fraud upon the court is fraud which is directed to the judicial machinery itself and is not fraud between the parties or fraudulent documents, false statements or perjury...It is where the court or a member is corrupted or influenced or influence is attempted or where the judge has not performed his judicial function...thus where the impartial functions of the court have been directly corrupted.”

^{vi} Salinas v. U.S. 522 at 65, 118 S.Ct. at 477, 139 L. Ed. 2d at 362:

“A conspirator must intend to further an endeavor which, if completed, would satisfy all of the elements of a substantive criminal offense, but it suffices that he adopt the goal of furthering or facilitating the criminal endeavor. He may do so in any number of ways

short of agreeing to undertake all of the acts/omissions necessary for the crime's completion.”

^{vii} I. Breach of Contract Against FBCCP Sectarian Members in violations of the By-Laws; II. Breach of Contract Against Lane a.k.a. Sabal Marketing Inc. in violations of the August 7, 1987 “Brokerage Agreement”; III. Claim for Fraudulent Inducement Against Lane a.k.a. Sabal Marketing Inc.; IV. Claim for Fraud by Fraudulent Inducement Against all Defendants; V. Wrongful Invasion of Privacy against defendants as stated; VI. Claim for Interference with an Advantageous Business Relationship(s) against all Defendants; VII Wrongful Invasion of Privacy of FBCCP “Non Sect” against Defendants; VIII Unjust Enrichment against all Defendants; XI Claim for Accountings and Discovery of Records regarding certain monies due and owing Plaintiffs Taken by larceny and fraud against all Defendants; X Racketeering against all Defendants; XI ANTI- Trust XII Cause for inadequate training, Supervision and Discipline Per Respondent Superior and Vicarious Liability And Class Action and in the timely filed Amended Complaint reduced to 50 pages in order to comply with the prejudiced restrictions of the Court to limit Plaintiffs exposing Defendants detailed “outrageous” violations of the laws and contracts as Count I. Reinstating All Claims of the Amended June 22, 1989 Complaint 89-3299^{vii}, As Written By Popper P.A.; Count II. Malicious Prosecution; Count III. Petition For Writ Of Mandamus—To Compel recognition of petitioner’s election to the FBCCP governing board; Count IV. Unjust Enrichment; Count V. Claim for Accountings and Discovery of Records Regarding Certain Monies Due and Owing Plaintiffs Taken by Larceny and Fraud; Count VI. Racketeering; Count VII. Anti-Trust; Additionally Plaintiffs seek Writs of Mandamus; Habeas Corpus; Prohibition; Restitution; and Arrest Warrants for Defendants and Certification for Class Action.

^{viii} Attorney General Bob Butterworths report AG-109.

^x Rule 4-1.6 Confidentiality of Information (b) When a Lawyer Must Reveal Information. A lawyer shall reveal such information to the extent the lawyer believes necessary: (1) to prevent a client from committing a crime;...”

Rule 4-1.7 Conflict of Interest

Rule 4-1.8 Conflict of Interest; Prohibited Transactions (a)Business Transactions ...A lawyer shall not enter into a business transaction...(b) Using Information to Disadvantage of Client.

Rule 4-1.9 Conflict of Interest: Former Client

Rule 4-1.10 Imputed Disqualification

Rule 4-1.11 Successive Government and Private Employment

Rule 4-1.13 Organization as Client (ALL PARTS emphasis added.)

Rule 4-2.1 Advisor

Rule 4.4.1 Truthfulness in Statements to Others

Rule 4-4.2 Communication with Person Represented by Counsel

Rule 4-4.3 Dealing with unrepresented persons “...the lawyer shall make reasonable efforts to correct the misunderstanding.”

Rule 4-4.4 Respect for Rights of Third Persons

Rule 4-5.1 Responsibilities of a Partner or Supervisory Lawyer

^{xi} Jenkins v. State 385 So2d 1356 (Fla. 1980) alleging a PCA ruling without an opinion limited the Jurisdiction of the Higher Court. The courts alleged that the March 11, 1980 vote by the citizens 940,420 to 460,266 (67%) to restructure the courts limited the duties of the Florida Supreme Court per Florida Constitution Article V, 3(b)(3).

^{xii} Letter of J.D.T and J.G.T 10/1999

^{xiii} IN THE SUPREME COURT OF THE STATE OF FLORIDA, AMICUS CURIAE
BRIEF PER RELATED

IN RE: SC09-1121 ORDER DISBARRING ATTORNEY HEATHER M. GRAY

IN RE: SC09-1910 ORDER FOR STATEWIDE GRAND JURY #19

IN RE: SC98-2111 TOWNSEND v. BRUCE CHAPIN ET AL.; P.C.A.

IN RE: SC98-1966 TOWNSEND v. DAVID H. POPPER ET AL.; P.C.A.

IN RE: SC86-0918 TOWNSEND v. LANE; P.C.A

IN RE: SC07-1181 TOWNSEND ET AL v. KAREN TOWNSEND ET AL.

**Now as R.O.C.P 1.540 Action By Proved Frauds: Extrinsic, Intrinsic and
Fraud to the Courts by all defendants inclusive of judges and attorneys.**

IN RE: 2D10-774 TOWNSEND ET AL. v. HEATHER GRAY ET AL;

IN RE: 13th Circuit 06-6005 TOWNSEND ET AL. v. HEATHER GRAY ET AL.

FLORIDA BAR COMPLAINT(S)- 05-3977; 93-31, 690 and 691 and 692;

NOTICE TO INVOKE JURISDICTION OF THE FLORIDA SUPREME COURT

**FOR PETITION(S); FOR WRIT OF HABEAS CORPUS; WRIT OF MANDAMUS
WRIT OF CORAM NOBIS; WRIT OF PROHIBITION; TO THE FLORIDA
SUPREME COURT AND LOWER COURTS.**

CERTIFICATE OF TYPE SIZE

I hereby certify that pursuant to F.R.A.P. 32(a)(7)(B) this brief

Complies with type and volume limitations. There are 11,092 words and 48

Pages (excluding front pages). Type is Times New Roman Font Size 14.

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Appellant's Initial Brief, with
record excerpts, has been furnished to: Heather Gray 10011 Cannon Drive,
Riverview Florida 33569 as lower court representative for all Defendants

and to Judge Kovachevich, Tampa Federal Court 801 N Florida Ave Tampa,
Florida 33602, this day 4 September 2012, by regular first class USPS mail.

Respectfully Submitted By

Randall C. Townsend, Pro Se,
P.O. Box 21, Odessa, Florida 33556
(941) 350-2677 Jfyr59@hotmail.com
www.Judgeoneyourself.com
F.S.617.0834 Representative For
All Appellants