

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT (TAMPA) FLORIDA**

CASE NO.: 8:12-CV-1198-T-17EAJ

Filed May 29, 2012 1:44 PM

RANDALL C. TOWNSEND,)
Individually, and as F.S.§617.0834,))
“Representative” As on behalf of all)
other Corporate members “non sect”)
as the rightful shareholders of The)
First Baptist Church of Citrus Park)
and Citrus Park Christian School)
AND AS “NEXT FRIEND” AND)
PATERNAL PARENT OF MINOR)
SON, J.D.T. and Daughter J.G.T.)
AND AS A DIRECT MEMBERS)
AS (FBCCP) AND)
AS “NEXT FRIEND” AS “DOE”))
AS ALL MINOR CHILDREN)
AND “OTHERS” AS “DOE” OF))
And For Plaintiff THE “NOT FOR)
PROFIT” CORPORATION)
KNOWN AS FIRST BAPTIST)
CHURCH OF CITRUS PARK,))
(FBCCP) AND CITRUS PARK)
CHRISTIAN SCHOOL, INC.))
(CPCS) and as All Members of))
the Citizens “Classes” ET AL)
APPELLANT/Plaintiffs)

FEDERAL RICO AND TORT
VIOLATIONS OF RELIGIOUS
RIGHTS CLAIMS
DEMAND FOR JURY TRIAL
DEMAND FOR CLASS ACTION
DEMAND FOR WRITS OF:
MANDAMUS
HABEAUS CORPUS;
PROHIBITION;
RESTITUTION PER
FLA.R.CIV.P. 1.380(c)

**INJUNCTIVE RELIEF and
BENCH WARRANTS Demand.**

Tampa Middle District
**Related CASE NO:
8:06-CV2050T-30-TGW**
[Townsend ET AL v. Beck ET AL]

**From Now Florida State Courts:
SC11-1042
2DCA APPEAL: 10-774
13th Circuit CASE NO: 06-6005**

v.

HEATHER M. GRAY, Individually,
HEATHER M. GRAY, ATTORNEY AT LAW,
HEATHER M. GRAY, P.A. A FLORIDA CORPORATION, ET.AL.) AS
NOW DISBARRED AND ONCE ATTORNEY FOR CLIENTS AS:

RANDALL TOWNSEND,)
Individual, and as F.S.§617.0834,)
“Representative” As on behalf of all)
other Corporate members “non sect”)
as the rightful shareholders of The)
First Baptist Church of Citrus Park)
and Citrus Park Christian School)

AND AS "NEXT FRIEND" AND)
 PATERNAL PARENT OF MINOR)
 SON, J.D.T.)
 AND AS "NEXT FRIEND" AND)
 PATERNAL PARENT OF MINOR)
 DAUGHTER, J.G.T)
 AND AS A DIRECT MEMBER)
 OF THE FIRST BAPTIST)
 CHURCH OF CITRUS PARK)
 CORPORATION AS (FBCCP) AND)
 AS "NEXT FRIEND" AS "DOE")
 AS ALL MINOR CHILDREN)
 AND "OTHERS" AS "DOE" OF)
 And For Plaintiff THE "NOT FOR)
 PROFIT" CORPORATION)
 KNOWN AS FIRST BAPTIST)
 CHURCH OF CITRUS PARK,)
 (FBCCP) AND)
 CITRUS PARK CHRISTIAN)
 SCHOOL, INC.(CPCS) and as All)
 Members of the Citizens "Classes")
 AS "Father/Parent Class" and)
 AS "Church Class" and)
 AS "Florida Citizens Class")
 Plaintiffs)
 v.)
HEATHER M. GRAY,)
Individually,)
HEATHER M. GRAY,)
ATTORNEY AT LAW,)
HEATHER M. GRAY,)
PROFESSIONAL)
ASSOCIATION AS A)
FLORIDA CORPORATION,)
 And Co-Defendants as)
 RONALD L. BECK,)
 (a.k.a. Ron Beck) Individually,)
 REVEREND RONALD L. BECK,)
 AS SENIOR PASTOR, OF)
 FIRST BAPTIST CHURCH OF)
 CITRUS PARK, (FBCCP),)
 ET. AL. AND NOW As per all as)
 DEFENDANTS Listed Below herein,
 AS STATED BELOW

RANDALL TOWNSEND,
Individual,
AND AS “NEXT FRIEND” AND
PATERNAL PARENT OF
MINOR SON, J.D.T.
AND AS “NEXT FRIEND” AND
PATERNAL PARENT OF MINOR
DAUGHTER, J.G.T Et.Al.
Plaintiffs, or as Appellants
V.

L.T. CIRCUIT CASE NO: 02-03812
2DCA- CASE NO: 2D07-4861
DIVISION: K
FROM CASE NO: 01-15813 and 01-15814
OF FAMILY COURT –DOMESTIC
VIOLENCE DIVISION, &
02-4974-DIVORCE, AND
By Motions for Consolidation of below
Related cases, tried to be heard and tried
herein by jury but was unlawfully denied.

RONALD L. BECK, (a.k.a. Ron Beck) INDIVIDUALLY, REVEREND RONALD L. BECK, AS SENIOR PASTOR, OF FIRST BAPTIST CHURCH OF CITRUS PARK, (Hereinafter as FBCCP), RON BECK, AS PASTOR /MEMBER OF FBCCP AS OF CPCS SCHOOL BOARD, RON BECK, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER, AS BY-LAW’S PASTOR/MEMBER OF ALL COMMITTEES OF FBCCP AND CPCS
WILLIAM T. BROWN, (a.k.a. Bill Brown), INDIVIDUALLY, REVEREND WILLIAM T. BROWN, OF FBCCP AS PASTOR OF EDUCATION AND ADMINISTRATION;
HERMAN MEISTER, INDIVIDUALLY, REVEREND HERMAN MEISTER, AS PASTOR OF SCHOOL MINISTRIES, OF FBCCP; HERMAN MEISTER AS CPCS EMPLOYEE AND SCHOOL BOARD MEMBER, HERMAN MEISTER AS BY-LAW PASTOR/MEMBER OF ALL COMMITTEES OF FBCCP/CPCS, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,
GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE(1997-2005) DEACON AND GARY LEATHERMAN AS MEMBER OF FINANCE COMMITTEE OF FBCCP AND GARY LEATHERMAN AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,
ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; ROBERT GILES AS FBCCP DEACON, ROBERT GILES AS MEMBER OF THE CPCS SCHOOL BOARD, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,
TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER OF FBCCP TIM JEFFERS, AS FBCCP DEACON, TIM JEFFERS, AS FBCCP TRUSTEE (2005-present),
FRANK EDWARDS, INDIVIDUALLY, FRANK EDWARDS AS FBCCP FINANCE COMMITTEE MEMBER, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,
MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP;
MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMATE, AS CHAIRMAN OF DEACONS, 2000-2001, OF FBCCP;
JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE,(1995-present) OF FBCCP, JOE HOWLETT AS FINANCE COMMITTEE MEMBER 2007

GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS ALLEGED CORPORATION PRESIDENT, AND AS TRUSTEE (at all times), GEOFF SMITH AS FBCCP DEACON; GEOFF SMITH, AS CHAIRMAN OF PHASE I COMMITTEE; DR. LON LYNN, INDIVIDUALLY, DR. LON LYNN, AS A PROFESSIONAL MEDICAL DOCTOR, KAREN HARROD TOWNSEND, Individually, KAREN HARROD TOWNSEND AS EMPLOYEE OF CPCS/FBCCP PAULA POWELL, Individually, PAULA POWELL AS FBCCP FINANCIAL SECRETARY EMPLOYEE, PAULA POWELL AS CPCS SCHOOL BOARD MEMBER, CARL (BUDDY) RAWLS, Individually, CARL(BUDDY) RAWLS, AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, AND DEACON DUANE MILFORD, Individually, DUANE MILFORD AS LONG RANGE PLANNING COMMITTEE MEMBER OF FBCCP, AS PERSONNEL COMMITTEE MEMBER AS CHAIRMAN,1997, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER, KAREN JEFFERS, Individually, KAREN JEFFERS AS EMPLOYEE AS SCHOOL PRINCIPLE OF CPCS/FBCCP, GAYLE LYNN, Individually, GAYLE LYNN, AS EMPLOYEE AS DEAN OF STUDENTS CPCS/FBCCP, APRIL BECK, Individually, APRIL BECK, AS EMPLOYEE OF CPCS/FBCCP, JIM LEAHY, Individually, JIM LEAHY AS PERSONNEL COMMITTEE CHAIRMAN OF FBCCP, JIM LEAHY AS DEACON FBCCP, JOE KAREAS, Individually, MICHAEL JOHN CORBIN, Individually, MICHAEL JOHN CORBIN AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, JACKIE CORBIN, Individually, JACKIE CORBIN AS CPCS SCHOOL BOARD MEMBER 2007 JOYCE MEISTER, Individually, JOYCE MEISTER, AS EMPLOYEE OF CPCS/FBCC, JACKIE HOWLETT, Individually, JACKIE HOWLETT AS CPCS SCHOOL BOARD MEMBER, JACKIE HOWLETT AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, MIKE SMOAK, AS Individually, MIKE SMOAK AS CPCS BOARD MEMBER, 1999-2007 MIKE SHAR, Individually, THE FIRST BAPTIST CHURCH OF CITRUS PARK BOARD OF DEACONS OF 1999-2000-2001-2002-2003-2004-2005-2006 DON BECK, Individually, DON BECK, AS DEACON, JOHN COLLINSON, Individually, JOHN COLLINSON, AS DEACON, BILL CRAFT, Individually, BILL CRAFT, AS DEACON, BILL CRAFT AS 2007 CHAIRMAN OF THE FINANCE COMMITTEE ED HOPKINS, Individually, ED HOPKINS, AS DEACON, JERRY MILLER, Individually, JERRY MILLER, AS DEACON, WILSON SMITH, Individually, WILSON SMITH, AS DEACON DAVID POWELL, Individually, DAVID POWELL, AS DEACON, (Inactive 2007) MIKE POWELL, Individually, MIKE POWELL, AS DEACON

MIKE HOLNESS, Individually, MIKE HOLNESS, AS General Member
MARK JEFFERS, Individually, MARK JEFFERS, AS General Member
DAVE FERGUSON, Individually, DAVE FERGUSON, AS PASTOR/OFFICER et al.
AS THESE SELECT ASSOCIATES AND OFFICERS ABOVE AS ALSO GENERAL
MEMBERS OF THE CORPORATION ALLEGING TO ACT LAWFULLY
AS d/b/a,
FIRST BAPTIST CHURCH OF CITRUS PARK, (FBCCP) and CITRUS PARK
CHRISTIAN SCHOOL, (“CPCS”), A MINISTRY OF FBCCP, a Corporation per
F.S.617, “Not for profit”
AND AS ALSO THESE as a “Sect Class” and with the
THIRD PARTY INDIVIDUALS, as “Sect Agents Class” a.k.a. (Black/Blue) as
AGENTS AND OR AGENCIES OR OTHERS AS “PERSONS” WHO TORTFULLY
AND NEGLIGENTLY INTERFERE IN CONTRACT AND BY-LAWS “RIGHTS” AS

CHARLES H. SCRUGGS III., **CIRCUIT CASE NO. 05-0911**
Individually, **DIVISION G**
CHARLES H. SCRUGGS, III. ESQUIRE, **APPEALS CASE:2D06-2811**
As attorney at law/ former Circuit Judge
CHARLES H. SCRUGGS, III, P.A., A Professional Association Law Firm,

KAREN HARROD TOWNSEND, Individually, **CASE NO 05-9605 Civil**
KAREN HARROD TOWNSEND AS
EMPLOYEE OF (CPCS) OF THE FBCCP **Per R.O.C.P 1.540 an Independent**
ACTION and of
02-4974, Family Court and
APPEALS CASE: 2D06-3469
FLORIDA S.Ct. SC07-1181
STEVEN TYLER HARROD, Individually, **FROM CASE NO: 01-15814 and**
DONALD HARROD, Individually, **related CASE NO: 01-15813 and**
NORMA HARROD, Individually, **02-03812**

JOHN A. GRANT, JR. Individually, JOHN A. GRANT, JR. AS REGISTERED AGENT
OF FBCCP/CPCS CORPORATION, JOHN A. GRANT, JR. Attorney at Law,
JOHN GRANT AS NOW FORMER STATE OF FLORIDA SENATOR
DUANE JANSSEN, Individually, and DUANE JANSSEN AS C.P.A. and DUANE
JANSSEN AS C.P.A. for JANSSEN & HORGAN as NOW JANSSEN & IGOR
C.P.A., P.A.
JANSSEN & IGOR. (Formerly Janssen & Horgan) C.P.A.’s, P.A. a Florida Corporation
UTICA INSURANCE COMPANY OF NEW YORK,
CHARLES DENNY, IV, Individually, CHARLES DENNY, IV, AS ATTORNEY AT
LAW FOR THE FIRM OF DICKINSON & GIBBONS P.A.,
THE LAW FIRM OF DICKINSON & GIBBONS, P.A. ATTORNEYS AT LAW,
A. JAMES ROLFES, Individual, A. JAMES ROLFES, AS ATTORNEY AT LAW,
A. JAMES ROLFES, AS ATTORNEY OF THE LAW FIRM OF DICKINSON
& GIBBONS, P.A. ATTORNEYS AT LAW,
DREW GARDNER, AS Individual, DREW GARDNER AS ATTORNEY AT LAW

FOR THE CHRISTIAN LAW ASSOCIATION
THE CHRISTIAN LAW ASSOCIATION, A FLORIDA CORPORATION
DAVID GIBBS, III, Individually, DAVID GIBBS, III, AS ATTORNEY AT LAW,
GIBBS LAW FIRM. P.A., DAVID GIBBS, III, AS ATTORNEY AT LAW, OF
THE CHRISTIAN LAW ASSOCIATION
STACEY TURMEL, Individually, STACEY TURMEL AS ATTORNEY AT LAW, OF
STACEY TURMEL, P.A., THE LAW FIRM OF STACEY TURMEL, P.A.
THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA UNDER THE
CARE AND SUPERVISION OF JEB BUSH, CHARLIE CRIST, BUDDY
MCKAY, LAWTON CHILES, AND NOW RICK SCOTT;
MR. CHARLIE CRIST, Individually, MR. CHARLIE CRIST, AS IN THE OFFICIAL
POSITION AS THE ATTORNEY GENERAL FOR THE STATE OF FLORIDA,
THE OFFICE/DEPARTMENT OF THE ATTORNEY GENERAL FOR THE STATE
OF FLORIDA;
THE OFFICE/DEPARTMENT OF THE BOARD OF EDUCATION FOR THE STATE
OF FLORIDA;
Mr. CHARLIE CRIST, AS FORMER DEPARTMENT OF EDUCATION
COMMISSIONER
Mr. TOM GALLAGHER, Individually,
MR. TOM GALLAGHER, AS IN THE OFFICIAL POSITION AS THE CHIEF
FINANCIAL OFFICER OF THE STATE OF FLORIDA DEPARTMENT OF
FINANCIAL SERVICES, and THE DEPARTMENT OF FINANCIAL
SERVICES,
THE DEPARTMENT OF CHILDREN AND FAMILIES OF THE STATE OF
FLORIDA,
DAVID GEE, AS SHERIFF OF HILLSBOROUGH COUNTY FLORIDA, (HCSO)
DAVID GEE, Individually,
DAVID GEE, AS EXECUTIVE OFFICER OF THE COURT OF HILLSBOROUGH
COUNTY
GARY TERRY, Individual,
GARY TERRY, AS HCSO DEPUTY- (Major/now Coronal Retired)
JOE HOWLETT AS HILLSBOROUGH COUNTY SHERIFF DEPUTY,
JOHN CAMPO, Individual, JOHN CAMPO, AS HCSO DEPUTY
RICHARD WALKER, Individual, RICHARD WALKER, AS HCSO DEPUTY
CAL HENDERSON, AS Past SHERIFF OF HILLSBOROUGH COUNTY, FLORIDA,
CAL HENDERSON, Individually,
WALTER HEINRICH, AS Past SHERIFF OF HILLSBOROUGH COUNTY FLORIDA,
WALTER HEINRICH, Individually,
MIKE SMOAK, A HCSO DEPUTY AND
SCOTT WELLINGER, Individually, SCOTT WELLINGER, AS HCSO DEPUTY
LUTHER CORE, Individually, LUTHER CORE AS HCSO DEPUTY
PAUL J. GUARINO, Individually, PAUL J. GUARINO, AS HCSO DEPUTY,
HARRY HOOVER, Individually, HARRY HOOVER, AS HCSO DEPUTY,
KEVIN L. BODIE, Individually, KEVIN L. BODIE, AS HCSO DEPUTY,
J.R. BURTON, Individually, J.R. BURTON, AN HCSO DEPUTY
JAMES (JIM) COATS, Individually, JIM COATS AS SHERIFF OF PINELLAS

COUNTY FLORIDA, (PCSO)
EVERETT RICE, Individually,
EVERETT RICE, AS FORMER SHERIFF OF PINELLAS COUNTY
TIM JEFFERS, as PINELLAS COUNTY SHERIFF DEPUTY,
JOSEPH A. GILLETTEE, Individually, GILLETTE AS PCSO DEPUTY,
THE PINELLAS COUNTY SHERIFF'S OFFICE (PCSO)
BOB WHITE, AS SHERIFF OF PASCO COUNTY FLORIDA,
MICHAEL JOHN CORBIN, AS PASCO COUNTY SHERIFF DEPUTY DETECTIVE,
THE DEPARTMENT OF THE PASCO COUNTY SHERIFF,
THE CHIEF OF POLICE OF TAMPA, FLORIDA, and
POLICE OFFICER JOE KAREAS OF THE CITY OF TAMPA,
THE CITY OF TAMPA
CYNTHIA BARNARD SANZ, Individually,
CYNTHIA BARNARD SANZ AS
SPECIAL AGENT SUPERVISION FOR THE FLORIDA DEPARTMENT OF
LAW ENFORCEMENT,
MICHAEL O'CONNELL, Individually,
MICHAEL O'CONNELL, SPECIAL AGENT FOR THE FLORIDA DEPARTMENT
OF LAW ENFORCEMENT,
MR. GUY TUNNELL, FORMER COMMISSIONER, FLORIDA DEPARTMENT OF
LAW ENFORCEMENT, NOW AS
MR. GERALD BAILEY COMMISSIONER, FLORIDA DEPARTMENT OF LAW
ENFORCEMENT,
THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT
CURTIS BAUGHMAN, Individually,
NANCY LOPEZ, Individually,
CURTIS BAUGHMAN AND NANCY LOPEZ AND PAM BONDI, AS AGENTS OF
THE VICTIMS ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA,
THE DEPARTMENT OF VICTIMS ASSISTANCE, HILLSBOROUGH COUNTY,
MARK A. OBER, Individually, MARK A. OBER AS STATE ATTORNEY OF
FLORIDA,
BOB PETSCHOW, individually and BOB PETSCHOW, AS ASSISTANT TO THE
STATE ATTORNEY
CHUCK HOLLAND, individually and CHUCK HOLLAND AS ASSISTANT TO THE
STATE ATTORNEY
CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY
FLORIDA CIRCUIT CIVIL COURTS,
MANUEL MENENDEZ JR. Individually,
JAMES ARNOLD, Individually,
JAMES ARNOLD, A CIRCUIT COURT JUDGE OF HILLSBOROUGH
COUNTY FLORIDA,
WAYNE TIMMERMAN, Individually,
JUDGE WAYNE TIMMERMAN A CIRCUIT COURT JUDGE OF HILLSBOROUGH
COUNTY FLORIDA,
RAUL PALOMINO, Individually,
JUDGE RAUL PALOMINO, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH

COUNTY FLORIDA,
FRANK GOMEZ, Individually,
JUDGE FRANK GOMEZ A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
MONICA SIERRA, Individually,
JUDGE MONICA SIERRA, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
RALPH STODDARD, Individually,
JUDGE RALPH STODDARD, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
GREG HOLDER, Individually,
JUDGE GREG HOLDER, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
MARVA CRENSHAW, Individually,
JUDGE MARVA CRENSHAW, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA, AND
MARVA CRENSHAW , A JUDGE FOR THE STATE OF FLORIDA, 2nd DCA;
REX M. BARBAS, Individually,
JUDGE REX M. BARBAS, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
MARTHA J. COOK, Individually,
JUDGE MARTHA J. COOK, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
RAQUEL A. RODRIQUEZ, Individually,
RAQUEL A. RODRIQUEZ AS GENERAL COUNSEL TO THE OFFICE
OF THE GOVERNOR (Bush) OF THE STATE OF FLORIDA
BROOKE S. KENNERLY, Individually,
BROOKE S. KENNERLY AS EXECUTIVE DIRECTOR FOR THE JUDICIAL
QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA,
THE JUDICIAL QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA,
THE FLORIDA BAR,
THE OFFICE OF THE FLORIDA BAR OFFICER OF EXECUTIVE DIRECTOR,
THE OFFICES OF THE FLORIDA BAR GOVERNORS,
JOHN BERRY, Individually,
JOHN BERRY, AS FLORIDA BAR LEGAL DIVISION DIRECTOR;
JOHN F. HARKNESS, JR, INDIVIDUAL,
JOHN F.HARKNESS, AS EXECUTIVE DIRECTOR OF THE FLORIDA BAR
JOHN F. HARKNESS, AS MEMBER ON THE BOARD OF DIRECTORS OF
DEFENDANT FLORIDA LAWYERS MUTUAL INSURANCE COMPANY,
JOHN BARR, INDIVIDUALLY, JOHN BARR, AS THE FLORIDA BAR,
COMPLAINTS IN PERSON AGENT;
THE OFFICE OF THE PRESIDENT OF THE FLORIDA BAR,
HENRY M. COXE III, INDIVIDUAL,
HENRY M. COXE III, AS PRESIDENT OF THE FLORIDA BAR
THE FLORIDA BAR OFFICER OF TAMPA BRANCH OFFICE
EXECUTIVE/DISCIPLINE DIRECTOR AS BRANCH STAFF COUNSEL,

ANTHONY BOGGS, INDIVIDUALLY,
ANTHONY BOGGS, AS THE FLORIDA BAR DISCIPLINARY PROCEDURES
EMPLOYEE,
TIMOTHY CHINARIS, Individually,
TIMOTHY CHINARIS, AS THE FLORIDA BAR PROFESSIONAL ETHICS BOARD
REVIEW EMPLOYEE,
THE FLORIDA BAR TAMPA INTAKE STAFF COUNSEL EMPLOYEE, MS.
“DOE” LIEMAN, MS. “DOE” LIEMAN, Individually,
MS. JANE CRISTY AS THE FLORIDA BAR TAMPA INTAKE STAFF EMPLOYEE;
MS. JANE CRISTY, Individually;
THE STATE OF FLORIDA, and
SHERIFF’S OF SANTA ROSA COUNTY From 1999, Individually and AS SHERIFF;
SANTA ROSA COUNTY DEPUTY DETECTIVE RYAN, Individually and AS Deputy;
SANTA ROSA COUNTY DEPUTY WHEELER, Individually and AS Deputy;
SANTA ROSA COUNTY SHERIFF’ DEPARTMENT;
SANTA ROSA COUNTY, OF THE STATE OF FLORIDA;
HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA
THE HILLSBOROUGH COUNTY FLORIDA BOARD OF COUNTY
COMMISSIONERS JOINTLY AND INDIVIDUALLY AS,
ROSE FERLITA,
KEN HAGAN,
KEVIN WHITE,
AL HIGGINBOTHAM,
JIM NORMAN,
BRIAN BLAIR,
MARK SHARPE AND AS SUPERVISORS OF PAT BEAN AND RENEE LEE;
PAT BEAN, AS HILLSBOROUGH COUNTY ADMINISTRATOR EMPLOYEE;
PAT BEAN ATTORNEY AT LAW AND
PAT BEAN, INDIVIDUALLY
RENEE LEE, Individually,
RENEE LEE, ATTORNEY AT LAW;
RENEE LEE, AS HILLSBOROUGH COUNTY, FLORIDA, EMPLOYEE;
THE SECOND DISTRICT COURT OF APPEALS and JUDGES OF THE SECOND
DISTRICT COURT OF APPEALS AS “PERSONS” JOINTLY AND AS
“PERSONS” INDIVIDUALLY AS,
STEVAN T. NORTHCUTT,
CHARLES A. DAVIS,
CRAIG C. VILLANTI,
DOUGLAS A. WALLACE,
EDWARD C. LaROSE,
CAROLYN K. FULMER,
CHRIS W. ALTENBERND,
PATRICIA J. KELLY,
JAMES BIRK HOLD, Individually AND AS CLERK OF THE SECOND
DISTRICT COURT OF APPEALS, LAKELAND FLORIDA;
THE FLORIDA SUPREME COURT, AND JUDGES OF THE FLORIDA SUPREME

COURT AS JUDGES AND AS “PERSONS” JOINTLY AND “PERSONS” INDIVIDUALLY AS,
CHIEF JUDGE FRED LEWIS, CHARLIE T. WELLS, HARRY LEE ANSTEAD, BARBARA J. PARIENTE, PEGGY A QUINCE, RAOUL G. CANTERO, KENNETH B. BELL; CHARLES CANADY AND AS SUPERVISORS OF CLERK,
THOMAS D. HALL, Individually;
THOMAS D. HALL, AS CLERK FLORIDA SUPREME COURT;
KMART CORPORATION also d.b.a. SEARS HOLDING COMPANY, INC.(Kmart)
JOE PALKO, Individual, JOE PALKO, EMPLOYEE AS Vice President (Kmart)
SEARS HOLDING COMPANY
RANDY BRIGHT, Individual, RANDY BRIGHT, (Kmart) EMPLOYEE AS REGIONAL COACH,
KEITH JOHNSON, Individual, KEITH JOHNSON, (Kmart) EMPLOYEE AS REGIONAL HUMAN RESOURCES DIRECTOR,
SHANE PEARSON, Individual, SHANE PEARSON, (Kmart) EMPLOYEE AS LOSS PREVENTION COACH,
KATHERINE CUNNINGHAM, Individual, KATHERINE CUNNINGHAM, (Kmart) EMPLOYEE AS DISTRICT COORDINATOR SECRETARY
DANIEL J. GENTILE, Individual, DANIEL J. GENTILE, (Kmart) EMPLOYEE AS DISTRICT COACH
DOUG LIVINGSTON, Individual, DOUG LIVINGSTON, AS KMART EMPLOYEE LOSS PREVENTION COACH, AT STORE 3092,
ROY ALLEN, Individual, ROY ALLEN, KMART EMPLOYEE AS ASSISTANT COACH, AT STORE 3092,
DR. LINDA ROWE CAMPBELL, Individual, DR. LINDA ROWE CAMPBELL, (Kmart) EMPLOYEE AS PHARMACIST AT STORE 3092
BARBARA BOOTH, Individual, BARBARA BOOTH, (Kmart) EMPLOYEE AT STORE 3092
MIKE SHUMATE, Individual,
MIKE SHUMATE, AS AN OFFICER OF THE UNITED STATES COAST GUARD now retired,
“DOE”, as any and all Insurance and or Bonding Companies, Carriers or the like for any Defendant or representative of any Defendant herein, past, present or future.
MEDIA GENERAL OPERATIONS NEWSPAPER, AND AS SUBSIDIARY THE TAMPA TRIBUNE,
JANET E. COATS, Individually, JANET E. COATS AS EXECUTIVE EDITOR AND VICE PRESIDENT OF THE TAMPA TRIBUNE
MICHELLE BEARDEN, Individually, MICHELLE BEARDEN, AS TAMPA TRIBUNE REPORTER/EMPLOYEE
THE SAINT PETERSBURG TIMES,
BILL COATS, Individually, BILL COATS, AS A SAINT PETERSBURG TIMES EMPLOYEE/REPORTER
PAUL TASH, Individually, PAUL TASH, AS SAINT PETERSBURG TIMES, EDITOR, CEO and CHAIRMAN
STANFORD R. SOLOMON, individually,

STANDARD R. SOLOMON, ATTORNEY AT LAW;
SOLOMON TROPP LAW GROUP, P.A.;
STACEY TURMEL, individually, STACEY TURMEL ATTORNEY AT LAW, P.A.;
JUDGE JACKSON, JUDGE GRATE, JUDGE JENKINS, individually and as judges in
SC11-1042, per their ruling in May 2011;
LINDA CHAPIN, Individually, LINDA CHAPIN, AS CHAIRWOMAN OF THE
ORLANDO COUNTY COMMISSION, AND LINDA CHAPIN AS CLERK OF
COURT, ORANGE COUNTY FLORIDA;
BRUCE E. CHAPIN, Individually, BRUCE E. CHAPIN P.A.;
DAVID H. POPPER, Individually, DAVID H. POPPER P.A.;
O'NEILL, CHAPIN, MARKS, LIEBMAN, POPPER, COOPER, ATTORNEYS AND
COUNSELORS AT LAW, P.A.;
CHARLES E. LANE JR. Individually, and d.b.a, a.k.a. SABAL MARKETING;
SABAL MARKETING INC.;
CHARLES E. WILLIAMS JR., Individually, CHARLES E. WILLIAMS P.A.;
ROM POWELL, Individually,
ROM POWELL AS FLORIDA CIRCUIT JUDGE;
STAN STRICKLAND, Individually,
STAN STRICKLAND AS FLORIDA CIRCUIT JUDGE;
R. JAMES STROKER, Individually, R. JAMES STROKER, AS
FLORIDA CIRCUIT JUDGE;
BELVIN PERRY, Individually, BELVIN PERRY AS FLORIDA CIRCUIT JUDGE;
LORI SELLERS ROWE, Individually, LORI SELLERS ROWE, AS STATE OF
FLORIDA EMPLOYEE OF THE STAFF OF CHARLIE CRIST ET AL;
RICHARD B. ORFINGER, Individually;
RICHARD B. ORFINDER, A JUDGE FOR THE STATE OF FLORIDA, 5th DCA;
FLORIDA LAWYERS MUTUAL INSURANCE COMPANY, (FLMIC);
THE FLORIDA BAR, ORLANDO OFFICE;
JANICE KARANDJEFF WICHROWSKI, Individually;
JANICE KARANDJEFF WICHROWSKI, AS A FLORIDA BAR ORLANDO OFFICE
EMPLOYEE;
JOHN B. ROOT, JR, Individually,
JOHN B. ROOT, JR, AS A FLORIDA BAR ORLANDO OFFICE EMPLOYEE;
LAWRENCE JAMES PHALIN, Individually,
LAWRENCE JAMES PHALIN, as the Designated Reviewer of the Grievance
Committee Ninth Judicial Circuit "A" for Chairman Kirk Nathaniel Kirkconnell;
KIRK NATHANIEL KIRKCONNELL, Individually,
KIRK NATHANIEL KIRKCONNELL, NINTH CIRCUIT "A" CHAIRMAN,
GRIEVANCE COMMITTEE OF THE FLORIDA BAR;
WENDY AKIN, Individually,
WENDY AKIN, GRIEVANCE COMMITTEE NINTH CIRCUIT "A" MEMBER;
BUDDY MCKAY, Individually;
JEB BUSH, Individually;
GEORGE W. BUSH, Individually;
STEVEN D. MERRYDAY, Individually;
STEVEN D. MERRYDAY, AS A FEDERAL JUDGE TAMPA MIDDLE DISTRICT,

FLORIDA; and
THOMAS WILSON, Individually;
THOMAS WILSON, AS MAGISTRATE TAMPA MIDDLE DISTRICT, FLORIDA;
FLORIDA BAR BOARD OF GOVERNORS;
CHARLES CANADY, Individually
CHARLES CANADY, AS JUSTICE OF THE FLORIDA 2ND DCA,
CHARLES CANADY, AS CHIEF JUSTICE OF THE FLORIDA SUPREME
COURT
DARRYL C. CASANUEVA, Individually,
DARRYL C. CASANUEVA, Alias Honorable Chief Justice of the 2DCA, Employee;
RICK SCOTT, Individually,
PAM BONDI, Individually,
PAM BONDI, AS ASSISTANT STATE ATTORNEY, TAMPA, FLORIDA
PAM BONDI, AS ATTORNEY’S GENERAL OF FLORIDA,
” DOE”, as any yet unknown accomplice to the acts of defendants herein;
AS DEFENDANTS.

COMPLAINT FOR CAUSES OF ACTION ARISING UNDER
FEDERAL RICO AND ANTI-TRUST LAWS
AND
TORT OF INTERFERENCE WITH RELIGIOUS RIGHTS
AND
TORT OF OUTRAGE
AND
FLORIDA TORT CLAIMS ACT
AND
INTENTIONAL NEGLIGENCE OF HONEST SERVICES
BY
BREACH OF CONTRACT(S)
AND
BREACH OF FIDUCIARY DUTIES
AND
MALICIOUS PROSECUTION
AND
TORT INTERFERENCE WITH CONTRACT(S)
AND
TORT INTERFERENCE WITH BUSINESS RELATIONS
AND
FRAUDULENT INDUCEMENT
AND
UNJUST ENRICHMENT
AND
CAUSES OF ACTION ARISING UNDER FEDERAL RICO
AND
ANTI-TRUST LAWS

AND
CIVIL RIGHTS LAWS
AND
ASSAULT BY WRONGFUL INVASION OF PRIVACY
WITH BATTERY
AND
ABUSE OF PROCESS
AND
OBSTRUCTION OF JUSTICE
AND
COMMON LAW FRAUD(S)
AND
GRAND LARCENY
AND
NEGLIGENCE IN THE CARE OF MINOR(S)
AND
INTERFERENCE WITH CHILD CUSTODY BY ABDUCTION
AND
UNLAWFUL EXTORTION BY FRAUDULENT DETAINMENT
OF PARENTAL RIGHTS
AND
FALSE ARREST MODEL PENAL CODE §212 October 2001
AND
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
AND
CLASS ACTION

COMES NOW the Plaintiffs, Randall Townsend (Townsend) pro se, for or as “Derivatively” all Plaintiffs now that the Malum in Se Malfeasance Contra Pacem Racketeering Plot against us as U.S. Citizens is proved and admitted by their “Alias” Superior Co-Participants now Estopped, Plaintiffs seek the Courts Conscience and state:

THE PARTIES

1. The Plaintiffs:

- A. Randall Townsend: Individual, is a citizen of the United States and more than 18 years of age since 1977, at various times as resident of Hillsborough, Clay, Pasco, Pinellas and Sarasota Counties Florida, acts for

himself, Per: our Contracts; Laws; and Black Law Bar Rules has filed multiple Affidavits, Complaints, Bar Complaints with the Florida Bar and Florida State Courts and U.S. and Florida Government Agencies/Agents And Multiple RESPONDENT Complaints from being Publicly Charged with Federal Criminal Acts and even “Unlawfully Trespassed” from inside his Church while performing his “Elected by the Members, Officer Duties since 1994” by False claims created by Jeffers/Gibbs ET AL Agents as retaliation and fraud which aided and abetted “McKay” Defendants that: improperly refuse to process fully; obtained an advantageous relationship and unjust enrichment for themselves; and as Townsend for himself, as a citizen and his Food Broker Business d.b.a. Future Marketing, spoke also:

B. For “others” Derivatively and Honorably as member since 8/1993, as:

1. The First Baptist Church of Citrus Park, a Florida “Not for Profit” F.S.§617 (FBCCP) and Citrus Park Christian School (CPCS) a ministry of FBCCP at 7705, Gunn Highway, Tampa Florida since the 1940’s and 1983 respectively; via Randall Townsend “Officer” legally unanimously elected since 1994 and still not lawfully removed by the “Sect” or lawful members per the FBCCP By-Laws and the Laws of the State Of Florida as By-Laws Article III. Section 18. Nominating Committee Member as The FBCCP Church Supreme Court “Ethics” Officer per F.S.§617.022, for/as the FBCCP; and By-Laws Articles as LONG RANGE PLANNING COMMITTEE CHAIRMAN since 1994 and as AWANA COMMANDER since 1994, and as various other

positions as “Officer” as without fraud nominated and elected by the FBCCP Congressional Body per the FBCCP By-Laws and as the Trustees of the FBCCP at various times have fraudulently “Under Color of Law” as Non Member Sheriff Deputies Jeffers and Howlett have violated the By-Laws by “Trespassing” and “Maliciously Prosecuting Members” and as “impeding” members even voting per the By-Laws to appoint or retain them or Geoff Smith as Trustees ;

2. “The Congressional Body”(The Body) as “Non-Sectarian” FBCCP Members and CPCS Members. Plaintiff, “THE BODY” operates in Hillsborough County Florida since about 1945 and is the FBCCP Non-Sect Members, Children and CPCS Members who since the 1994, Tim Jeffers ET AL “fraud, collusion, and arbitrariness” have been detained and made victims of violations causing loss of our Children, Contract Rights, Civil Rights, property and “public light”.

C. And as Randall Townsend as Next Friend of **his children J.G.T and J.D.T. United States Citizens Abducted 10/20/1999, by Defendants Plot**, per JDT/JGT’s own hand written letter and words, at relevant times Minors, FBCCP/CPCS Members and victims of illegal acts through 2012. Plaintiff J.D.T. (born 1983) is the Son and a Minor at the age of 4, of his Father Randall Townsend and J.D.T. Plaintiff J.G.T. (born 1985) is the Daughter and a Minor at the age of 2, of her father Townsend when this Dad in 1987, began exposing the criminal acts/omissions still ongoing stated herein done to J.G.T. J.D.T and J.G.T. at relevant times are to

benefit from Future Marketing and as member of FBCCP and Student of CPCS and deprived and per her hand written letter abducted against her and her brothers J.D.T.'s will by all Defendants and Others from safe her home and her safe father since October 20, 1999 and for a false public light forced to be detained with her deranged mother and the maternal family and prevented from any contact with her father, since 11/8/2002.

- D. As a F.S.493, Florida Security Officer (8/1999-2001) and impeded by co-participants per: F.S.775.087 (Battery upon a law enforcement officer); Assault; Abduction; Obstruction; Extortion; and other "Outrageous" Prosecution acts to prevent Townsend from reporting and obtaining relief from these Criminal acts by these Co-Participants as now proved herein;
- E. As "Florida Youth Soccer Volunteer of the Year" in 1995 and as "Next Friend" of and for Citizens of or and as the State Of Florida; All Via Townsend, individually and as an agent per F.S.120.69(1)(b),(c) Administrative Procedure Act; as all those for whom Townsend speaks "with clean hands" as Obstructed and abused **Whistle Blowers like others similarly situated seeking permanent equitable relief**, per our F.S.817.02, (Obtaining property by false personation) Law by these Under Color of Law self dealing "alias Government Persons", and Other Defendants, and "others Doe" per F.S.777, **PRINCIPAL;** **ACCESSORY; ATTEMPT; SOLICITATION; CONSPIRACY** who conspire even after the 2011 Admission by Florida Supreme Court Chief Judge Canady Indicting himself and these Named "Bondi-ites" Criminal

Participants and yet to be revealed “others Doe” due to illegally
“impeded” discovery by their ongoing conspired, fraudulent
Acts/omissions and Patterns of “Proved Shams” of Past Actions and
“Fraudulent and Defamation Predictions” as Townsend alleged and said to
all since about 1987:

1. Lane is lying about what he claims he as Sabal owns and what
Townsend can and cannot do per the “Brokerage Agreement” thus
preventing Townsend from doing business;
2. Lanes frauds are being aided and abetted by William, Popper, Chapin,
his wife (Linda), Judge Powell and “others” as Chapin bragged of his
now proved “McKay Plot” as admitted by Chief Judge Canady and
Judge Orfinger, Judge Lawson and Judge Sawaya and “others”;
3. And regarding Sunbelt Equipment Sales, Inc. upon being terminated in
1/1999, Townsend proved owners Bob and Donna Tronu were stealing
from their own company and Townsend before selling the company;
4. And to the FBCCP “Body” since 1994, and specifically said to the
estranged now Ex- Wife in the kitchen of our family home on October
10, 1999, “These six men (Beck, Nasworthy, Meister, Leatherman,
Jeffers, Brown) are lying and I am not the one lying and stealing from
the church! It is illegal what they did to remove me 9/8/99!”

Hearing this, the estranged wife said “You’re lying” and joined the “Sect”!
Townsend now claims he has proved and has exposed these facts of which
Charles Scruggs, Heather Gray and “others” knew and was retained to

Litigate these “Failed Honest Services” include, claim and fully retain per:

“Florida Constitution Article II. Section 8. Ethics in Government.--
The people shall have the right to secure and sustain that trust
against abuse. To assure this right...Any public officer or
employee who breaches the public trust for private gain and any
person or entity inducing such breach shall be liable to the state for
all financial benefits obtained by such actions. The manner of
recovery and additional damages may be provided by law.”

And Defendants to violate the “public trusts” in this pattern using “Kolb”

Detainment do: self-granted Sovereign Immunity, Per Curium Affirmed

Rulings and including Revising the Florida Constitution and Laws

(by Politicians duly acting also as Lawyers and “Others”) by violation of:

“Florida Constitution Article II. Section 5. Public Officers.--...No person
shall hold at the same time more than one office under the government...”

Generally and Specifically in Restructuring the Florida Cabinet as

“Failure of Honest Services” being done against Plaintiff and “others” for
whom Townsend speaks alleging and affirming:

“Florida Constitution Article III. Section 18. Conflict of Interest.---A code
of ethics for all state employees and nonjudicial officers prohibiting
conflict between public duty and private interests shall be prescribed by
law.”

is being willfully, intentionally, knowingly and recklessly being violated.

Plaintiff, “Citizen(s)” is the above Plaintiffs and as the Tax Payers to the

State of Florida and clients or subject victims of the Florida Bar and its

Agents, Law Enforcers, Executive and Legislative Branches and courts,

Insurance companies and “Others Named herein” and “Others Doe” who

are or who do pay for Honest Services of Defendants not rendered or who

have been or per the ongoing Criminal Enterprise are and will be deprived

of our Civil and Contract Rights, Property and U.S. Constitutional Rights.

2. **The Defendants:**

A. Defendant as The STATE OF FLORIDA:

B. Defendants as United States Constitutional Officers and Agents, George W. Bush, Steven D. Merryday, Thomas Wilson, and Mike Shumate, Individually and per their Agents Person, acted with malice and prejudice for self-dealing of themselves and their co-participants.

C. Defendants as State of Florida Constitutional or as Approved by the Florida Secretary of State as Business Entities and or Corporations or “Agents”:

(1) Defendant, FBCCP in name only for and per Derivative Law Claims;

(2) Defendant, The Florida Bar, alleges to act lawfully per Florida Rules of Court and Black Law Rules as the Official Supervisory Agent of the Florida Supreme Court, headquartered in Tallahassee, Leon County, Florida, operating through Agents John Harkness and John Barry and “others” as Board of Governors, Officers and Members.

(3) Defendant, The Florida Supreme Court, alleges to act lawfully per Florida Rules of Court and at times Federal Rules of Courts and Laws dutifully per their Oaths of Office, however at relevant times herein have without the security of their Oath Of Office aided and abetted illegally themselves and these Defendants named herein and “others Doe”.

(4) Defendant, The Office of the Governor of the State Of Florida during times held by Governors Lawton Chiles, Buddy McKay, Jeb Bush, Charlie Crist and now Rick Scott are to act per: Florida Statues and Constitution

“Article IV, Section 1.(a)...The Governor may require information in writing from all executive or administrative state, county, or municipal officers upon any subject relating to the duties of their perspective offices...(b) The governor may initiate judicial proceedings in the name of the state against any executive or administrative state, county or municipal officer to enforce compliance with any duty or restrain any unauthorized act.”

But upon being notified of the criminal practices of Popper, Williams, Lane/Sabal and “Others” our Governors have: aided and abetted the Acts; failed to provide “Honest Services” or act to protect these citizens;

- (4) Defendant, Florida Department of Law Enforcement (FDLE) under the care and supervision of Guy Tunnell and Gerald Bailey “allege” to act as the Law Enforcement Arm of State Officers per the Florida Statues;
- (5) Defendant, The Office of the Attorney General of the State Of Florida, Created and with duties by the Florida Constitution Article IV, Sections 4,10, and “others”, under the care and supervision of now Pam Bondi, and past A.G.’s as Bill McCollum, Charlie Crist, Bob Butterworth, from 1991, “others” “allege to act as the Law Enforcement Officers for “Lawful Persons as their master citizens or themselves” however when faced with this conflict of interest have served themselves and their private interests over these citizens rights knowingly violating their Duty: Article IV. 4(b):

“...criminal laws occurring or having occurred, in two or more judicial circuits as part of a related transaction, or when any such offense is affecting or has affected two or more judicial circuits as provided by general law;

by willfully and knowingly using Bruce Chapin ET AL, David Gibbs, III, ET AL., John Grant ET AL and Heather Gray ET AL and “others” to “impede” Townsend’s now proved legal practices in the Circuits of the 5th

DCA and 2nd DCA, and 1st DCA and admitted by Chief Judge Canady.

(6) Defendant, Judicial Qualifications Commission, created per the Florida

Legislature per the Florida Constitution Article V. Section 12. And per

“1. vested with jurisdiction to investigate and recommend to the Supreme Court of Florida the removal from office of any justice or judge whose conduct, during term of office or otherwise occurring on or after November 1, 1966,...demonstrates a present unfitness to hold office...Malafides, scienter or moral turpitude on the part of a justice or judge shall not be required for removal from office of a justice or judge whose conduct demonstrates a present unfitness to hold office”.

Further, ...J.Q.C. Members conduct is supervised through the

Impeachment process or by the Governor per Article IV, Section 7,

Florida Constitution serving at his discretion and per “Florida Constitution

Article V, Section 19.—All judicial officers in this state shall be

conservators of the peace.” Plaintiffs believe only by doing “Honest

Services” will peace be conserved equally to all Plaintiffs.

(7) Defendant, Bruce E. Chapin, P.A., a professional association, and Florida

Bar Member (1968); as Attorney At Law, (Chapin) operates at relevant

times operates as the employee, agent, actual or apparent of Bruce E.

Chapin, P.A. acting within the scope of his practice out of Orlando,

Florida, Orange County.

(8) Defendant, David H. Popper, Individual; and David H. Popper P.A., a

professional association, and Florida Bar Member (1979); as Attorney

At Law, (Popper) operates at relevant times operates as the employee,

agent, actual or apparent of David H. Popper P.A. acting within the scope

of his practice out of Orlando, Florida, Orange County.

(9) Defendant, O’Neill, Chapin, Liebman, Marks, Popper, Cooper, ET AL, a professional association, at relevant times transacting it business practices out of Orlando, Florida, Orange County Florida and employed the relevant actors as Bruce E. Chapin and David H. Poppers as Officers and Partners alleged acting within the scope of their agency as Florida Bar Lawyers.

(10) Defendant, Charles E. Williams Jr, Individual; and Charles E. Williams Jr. P.A., a professional association, and Florida Bar Member (1982); as Attorney At Law, (Williams) operates at relevant times operates as the employee, agent, actual or apparent of Charles E. Williams Jr. P.A. acting within the scope of his practice out of Orlando, Florida, Orange County.

(11) Defendant Sabal Marketing, Inc., a Food Brokerage Business, alias Charles E. Lane Jr. at all times material herein operating within the scope of his employment or was an agent actual or apparent, conducting his business transactions out of Longwood, Orlando, Orange County Florida.

(12) Defendant, David Gibbs III, P.A., a professional association, David Gibbs III, individual; and as David Gibbs III Esquire; at all times material hereto, the Defendant David Gibbs III was employed by David Gibbs III. P.A. and acting within the scope of his employment or was an agent actual or apparent, of David Gibbs III P.A. and David Gibbs III ET AL. as Christian Law Association (CLA) Agent acting within the scope of his agency and as a Florida Bar Lawyer, and “transacting his business” from Seminole, Florida, Pinellas County to and for Plaintiffs since 1991;

(13) Defendant, Christian Law Association, is a professional association, incorporated in the State of Florida, headquartered in Seminole, Florida, and created by David Gibbs III, P.A. and David Gibbs III, individual, purportedly to “transact it’s business” in a Fiduciary capacity and provide Christian Ethical Legal Advice to all persons based on Religious Biblical Standards to act in the scope of Truthful Constitutional Legal Practices to and for these Plaintiffs since 1991 but who acts by their Agent David Gibbs, III ET AL, Drew Gardner ET AL and “others Doe” to conspire and deprive Townsend ET AL.

(14) Defendant, Florida Lawyers Mutual Insurance Company, (FLMIC), is a mutual insurance company incorporated in the State of Florida, headquartered in Orlando, Florida, and created by the Florida Bar in 1989, purportedly to provide malpractice insurance policies to Florida lawyers.

(15) Defendant, Hillsborough County Sheriffs Office, (HCSO) operates as a Florida Constitution Article VIII. Section 1.(d). and is to operate per the Laws of The United States, State of Florida, and Hillsborough County Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law.

(16) Defendant, Pinellas County Sheriffs Office, (PCSO) operates as a Florida Constitution Article VIII. Section 1.(d). and is to operate per the Laws of The United States, State of Florida, and Pinellas County Charter and Ordinances not inconsistent with general law as “Honest

Services” and for lack of “Honest Services” may be subjected to the law.

(17) Defendant, Pasco County Sheriffs Office, (Pasco), operates as a Florida Constitution Article VIII. Section 1.(d). and is to operate per the Laws of The United States, State of Florida, and Pasco County Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law.

(18) Defendant, Santa Rosa County Sheriff’s Office, (Santa Rosa), operates as a Florida Constitution Article VIII. Section 1.(d). and is to operate per the Laws of The United States, State of Florida, and Santa Rosa County Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law.

(19) Defendant, Charles Scruggs, P.A. a professional association, Defendant Charles Scruggs Individual, and Florida Bar Member (1964); as Attorney At Law, (Scruggs) operates at relevant times operates as the employee, agent, actual or apparent of Charles Scruggs P.A. acting within the scope of his practice out of Tampa, Florida, Hillsborough County was retained and paid for his services at various times from July 2000, until his termination on 9/30/2003, for failure to provide “Honest Services” having been exposed by Judges Palomino, Timmerman and Crenshaw and “others”.

(20) Defendant, Heather Gray, P.A. a professional association, was retained since about February 2003 and informed by a lengthy phone call

and at the advice directive of Charles Scruggs ET AL and on March 14, 2003, received a payment for “Honest Services” to be rendered in the amount of \$1,000 from Townsend for Townsend ET AL, still not done.

(21) Defendant, Dickinson & Gibbons, P.A. a professional association, Was retained for rendering “Honest Services” as said by Charles Denny IV, in January 2003, to Judge Arnold, I represent the entire membership of the church in case Townsend ET AL v. Beck ET AL, 02-03812 acting as Agent within the scope of his employment alleging to provide “Honest Services.” However, production of the 2006, FBCCP Records proved “Lack of Honest Services” and as “Conflict of Interest” and Frauds as Dickinson & Gibbons P.A. could not represent “Honest Services” for the FBCCP Corporation and the “Sect” and Townsend and his Children and the Non-Sect at the same time from 2003-2006-now as “Alleged” to the Court and the Clients.

(22) Defendant UTICA Insurance operates as an Insurance Company in the State of Florida and paid for the services of Dickinson & Gibbons, P.A. in the cases stemming from Townsend ET AL v. Beck ET AL 02-03812. and “Others DOE”.

(23) Defendant, John Grant P.A. a professional association, Defendant John A. Grant Jr., Individual; John Grant Jr. Esquire; at all times material hereto, the Defendant John A. Grant Jr., was employed by John A. Grant Jr. P.A. and acting within the scope of his employment or was an agent actual or apparent, of John A. Grant Jr. P.A. acting within the scope of his

agency and as a Florida Bar Member (1994-); A Florida State Senator; and FBCCP Registered Agent (1994-2007; (Grant) at relevant times “transacting his operations” in Tampa, Florida, Hillsborough County and Tallahassee, Florida, Leon County and acting allegedly Providing Honest Services for Townsend individual, FBCCP Corporation and “The Congregational Body” and all Citizen Plaintiffs but in his “fraud, collusion and arbitrariness” only acting and being paid privately without authorization from designated funds as Attorney for the Sect; Sect Agents and Other Defendants knowingly and intentionally violates and breaches his Attorney/Client Fiduciary Duty and Contract Duties to: The FBCCP/CPCS; non-sect “Body” members as Officer/Guardian Townsend speaks; Townsend individual; the Townsend Children (J.D.T. and J.G.T.) and other non sect members even in 2011, by intentionally, recklessly and fraudulently acting in omission of truthful disclosure; “fraud, and arbitrariness” against Townsend legal operations under the FBCCP By-Laws; CPCS Policy Handbook; State and Federal Laws; Florida Bar Rules; and Florida Rules of Courts regarding grievances with “Sect” members and “Sect Agents” since 1994 ([1] fraudulent uses of FBCCP Designated Funds and Members Property for Sect self dealing purposes) and Defendants and “others Doe” and concealing their fraudulent practices even to intentionally violate the citizens of tax payers and Eminent Domain money just to fuel the criminal acts/omissions of the “Sect” known and exposed since 1997 per the frauds

by the “Sect” in “[2] Building Frauds Scheme” per the Earle Property Acquisition Contract and obtaining Eminent Domain Money and of Bank loans as deprivations by Frauds and omissions to Plaintiffs as “The Body” and Citizens. John Grant from 1994 and to now still knowingly using his “Under Color of Law” Alias authority as he continues his frauds, illegal obstruction and extortion to Townsend, Plaintiffs and “others” enlisting “others” to practice with him their criminal enterprise.

(24) Defendant, Hillsborough County Florida, operates under Florida Constitution Article VIII Section 1.(a) and per the Hillsborough Charter is to provide “Honest Services” to these citizens thereof.

(25) Defendant, Hillsborough Board of County Commissioners, operates under Florida Constitution Article VIII Section 1(e), and per the Hillsborough Charter and Florida Laws is to provide “Honest Services” in the duty of and with the General Laws.

(26) Defendants, as Hillsborough County Sheriffs, operates per the Florida Constitution Article VIII, Section 1(d), and as Executive officer of the Hillsborough Circuit Courts per F.S. 26.49, and per the Hillsborough Charter and Florida Laws is in the duty of and with the General Laws, Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law. Cal Henderson, and Walter Heinrich, both as Past Sheriff of Hillsborough County and Sheriff David Gee as the Current Sheriff have in collusion for themselves, their Deputies and their “other” Co-

Participants failed to provide “Honest Services” to these Plaintiffs.

(27) Defendants, as Pinellas County Sheriffs, operates per the Florida Constitution Article VIII, Section 1(d), and as Executive officer of the Pinellas Circuit Courts per F.S. 26.49, and per the Pinellas Charter and Florida Laws is in the duty of and with the General Laws, Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law. Everett Rice and Jim Coats, both as Past Sheriff’s of Pinellas with Hillsborough County Sheriff David Gee as the Current Sheriff have in collusion for themselves, their Deputies and their “other” Co-Participants failed to provide “Honest Services” to these Plaintiffs.

(28) Defendants, as Pasco County Sheriff, operates per the Florida Constitution Article VIII, Section 1(d), and as Executive officer of the Pasco Circuit Courts per F.S. 26.49, and per the Pasco Charter and Florida Laws is in the duty of and with the General Laws, Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law. Bob White, as Past Sheriff of Pasco County, with Hillsborough County Sheriff David Gee as the Current Sheriff have in collusion for Themselves, their Deputies and their “other” Co-Participants failed to provide “Honest Services” to these Plaintiffs.

(29) Defendants, as Santa Rosa County Sheriffs, operates per the Florida Constitution Article VIII, Section 1(d), and as Executive

officer of the Santa Rosa Circuit Courts per F.S. 26.49, and per the Santa Rosa Charter and Florida Laws is in the duty of and with the General Laws, Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law. Since 1999 as Past Sheriff’s and current Sheriff “DOE” with Hillsborough County Sheriff David Gee as the Current Sheriff have in collusion for themselves, their Deputies and their “other” Co-Participants failed to provide “Honest Services” to these Plaintiffs;

28. Defendant Janssen & Igor, C.P.A. a Florida Corporation operating and doing it business interests from Pinellas County, Florida. With contracts for service from FBCCP and CPCS at various relevant times and intentionally failing to provide “Honest Services”.
29. Defendant, The Department of Children and Families of Florida, (DCF) Alleges to operate per the General Laws to seek the welfare of Florida Citizens and Families and safely reunite families as their alleged first goal but as proved herein “Failed to provide Honest Services” by frauds.
30. Defendant The Department of Financial Services alleges to operate per the Florida Constitution and General Laws to seek to as the arm of the State provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services”;
31. Defendant Dr. Lon Lynn, a medical doctor, operating and doing its business interests from Hillsborough County Florida and knowingly, intentionally and recklessly failing to provide “Honest Services”.

32. Defendant The States Attorneys Office and Officers operating under the Care and Supervision of Mark Ober and Assistant State Attorney Pam Bondi Alleges to operate per F.S. 27 and the Florida Constitution and the General Laws to seek the welfare of Florida Citizens and Families and safely reunite families through their Department of Victims Assistance as their alleged first goal per their Officers, Curtis Baughman, Nancy Lopez, Bob Petschow, Chuck Holland and others but as proved herein “Failed to provide Honest Services” by collusion and frauds.
33. Defendant, The Second District Court of Appeals of Florida alleges to operate per the Florida Constitution and General Laws to seek to as the arm of the State provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services”;
34. Defendant The Fifth District Court of Appeals of Florida alleges to operate per the Florida Constitution and General Laws to seek to as the arm of the State provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services”;
35. Defendant, The Tampa Bay Times formerly The Saint Petersburg Times alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;

36. Defendant, General Media Operations Newspaper and as Subsidiary The Tampa Tribune alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;
37. Defendant, Sears Holding, LLC. d.b.a. “Kmart” alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;
38. Defendant Sunbelt Equipment Sales, Inc. alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;
39. Defendant, The City of Tampa, alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;

D. Defendants, as Individuals being sued in their individual capacities:

- (1) Defendant Pam Bondi, Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Hillsborough County, Florida and an employee, director/officer/agent of Florida and Florida Bar Member acting within the scope of her agency, the Florida Supreme Court, and as Attorney’s General of Florida, and as

agent of State Attorney Mark Ober specifically alleging to provide “Honest Services” with HCSO Gary Terry, HCSO Deputies, Joe Howlett, and “Others” in Ober’s Victims Services Department in or around 11/15/2001 and since other times “impeding” and Obstructing Justice by herself and with her co-participants.

- (2) Defendant, Jeb Bush, Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Dade and Leon County, Florida and an employee, director/officer/agent of The State of Florida, acting within the scope of his agency, the Florida Supreme Court, and co-participants for self dealing with malice.
- (3) Defendant George W. Bush, Individual, At all times material hereto, is a resident/citizen of the State of Texas and the District of Columbia, doing business in these United States and an employee, director/officer/agent acting within the scope of his agency and co-participants for self-dealing with malice to obstruct justice of these Plaintiffs.
- (4) Defendant Charlie Crist, Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Pinellas and Leon County, Florida and an employee, director/officer/agent of The State Of Florida and Florida Bar Member acting within the scope of his Agency(s), the Florida Supreme Court, and co-participants for self-dealing with malice to obstruct justice of these Plaintiffs.
- (5) Defendant, John Harkness Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Leon

County, Florida and an employee, director/officer/agent of The Florida Bar and Florida Bar Member acting within the scope of his agency, the Florida Supreme Court, and co-participants for self-dealing with malice to obstruct justice of these Plaintiffs.

(6) Defendant, John Berry Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Leon County, Florida and an employee, director/officer/agent of The Florida Bar and Florida Bar Member acting within the scope of his agency, the Florida Supreme Court, and co-participants for self-dealing with malice to obstruct justice of these Plaintiffs.

(7) Defendant, Buddy McKay, Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Leon County, Florida and an employee, director/officer/agent of The State Of Florida and acting within the scope of his agency, the Florida Supreme Court, and co-participants for self-dealing with malice to obstruct justice of these Plaintiffs.

(8) Defendant, Bruce E. Chapin, Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Orange County, Florida and an employee, director/officer/agent of Bruce E. Chapin, P.A. a Florida Professional Association and Florida Bar Member since 1968 acting within the scope of his agency, the Florida Supreme Court, and co-participants.

(9) Defendant, Linda Chapin is a resident/citizen of the State of Florida, doing

business in or from Orange County, Florida and an employee,
at relevant times as director/officer/agent of Orange County and of the
State of Florida transacting her business within the scope of her agency
and the F.S.Ct. as the Orange County Commissioner Chairperson and as
Orange County Clerk of Court and “other” capacities yet to be exposed.

- (10) Defendant, FDLE Director, Gerald Bailey Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Leon County, Florida and an employee, director/officer/agent of The Florida Department of Law Enforcement acting within the scope of his agency, with the Florida Supreme Court, and co-participants for self-dealing with malice to obstruct justice to these Plaintiffs.
- (11) Defendant, David H. Popper, Individual; and David H. Popper P.A., a professional association, and Florida Bar Member (1979); as Attorney At Law, (Popper) operates at relevant times operates as the employee, agent, actual or apparent of David H. Popper P.A. acting within the scope of his agency out of Orlando, Florida, Orange County, with the Florida Supreme Court and co-participants for self-dealing with malice to obstruct justice to these Plaintiffs.
- (12) Defendant Charles Williams, Individual, and Charles Williams, Jr. Esquire, A Florida Bar Member (1982); At all times material hereto, was employed by Charles E. Williams Jr. P.A. and Others and was acting within the scope of his employment or was an agent actual or apparent of Charles E. Williams Jr. P.A. acting within the scope of his agency

(Williams) acted at relevant times from about 1987 as the Attorney of Lane a.k.a. Sabal Marketing, Inc. with his co-participants for self-dealing with malice to obstruct justice to these Plaintiffs

(13) Defendant, David Gibbs III, Individual, Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Pinellas County, Florida and an employee, director/officer/agent of David Gibbs, III, P.A. a Florida Professional Association and Florida Bar Member acting within the scope of his agency, the Florida Supreme Court, and co-participants for self-dealing with malice to obstruct justice to these Plaintiffs.

(14) Defendant, John A. Grant Jr., Individual; John Grant Jr. Esquire; at all times material hereto, the Defendant John A. Grant Jr., was employed by John A. Grant Jr. P.A. and acting within the scope of his employment or was an agent actual or apparent, of John A. Grant Jr. P.A. acting within the scope of his agency and as a Florida Bar Member (1994-); A Florida State Senator; and FBCCP Registered Agent (1994-2007; (Grant) at relevant times “transacting his operations” in Tampa, Florida, Hillsborough County and Tallahassee, Florida, Leon County and acting allegedly Providing Honest Services for Townsend individual, FBCCP Corporation and “The Congregational Body” and all Citizen Plaintiffs but in his “fraud, collusion and arbitrariness” only acting as Attorney for the Sect; Sect Agents and Other Defendants and

“Doe” knowingly and intentionally violates and breaches his Attorney/Client Fiduciary Duty and Contract Duties to: The FBCCP/CPCS; non-sect “Body” members as Officer/Guardian Townsend speaks; Townsend individual; the Townsend Children (J.D.T. and J.G.T.) and other non sect members even in 2011, by intentionally, recklessly and fraudulently acting in omission of truthful disclosure; “fraud, and arbitrariness” against Townsend legal operations under the FBCCP By-Laws; CPCS Policy Handbook; State and Federal Laws; Florida Bar Rules; and Florida Rules of Courts regarding grievances with “Sect” members and “Sect Agents” since 1994 ([1] fraudulent uses of FBCCP Designated Funds and Members Property for Sect self dealing purposes) and Defendants and “others Doe” and concealing their fraudulent practices even to intentionally violate the citizens of tax payers and Eminent Domain money just to fuel the criminal acts/omissions of the “Sect” known and exposed since 1997 per the frauds by the “Sect” in “[2] Building Frauds Scheme” per the Earle Property Acquisition Contract and obtaining Eminent Domain Money and of Bank loans as deprivations by Frauds and omissions to Plaintiffs as “The Body” and Citizens. Grant from 1994 and to 2012 still knowingly using his “Under Color of Law” Alias authority as he continues his frauds, illegal obstruction and extortion to Townsend, Plaintiffs and “others” enlisting

“others” to practice with him the criminal enterprise.

(15) Defendant Charles Denny, Individual, and Florida Bar Member; as Attorney At Law, (Denny) operates at relevant times operates as the employee, agent, actual or apparent of Charles Denny IV P.A. acting within the scope of his practice and transacting his business out of Sarasota, Florida, Sarasota County as employee and agent of Dickinson & Gibbons P.A.

(16) Defendant Heather M. Gray, Individual, and Florida Bar Member until disbarred in 2009; as Attorney At Law, (Gray) operates at relevant times and thereafter as employee, agent, actual or apparent of Heather Gray P.A. acting within the scope of her practice and doing her business out of Tampa, at 10011 Cannon Dr. Riverview, 33578 and P.O. Box 2668, Riverview, 33568, Florida,

Hillsborough County.

(17) TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER OF FBCCP TIM JEFFERS, AS FBCCP DEACON, TIM JEFFERS, AS FBCCP TRUSTEE (2005-present), “Sect Member”;

(18) JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE,(1995-present) OF FBCCP, JOE HOWLETT AS FINANCE COMMITTEE MEMBER 2007; “Sect Member”;

(19) MIKE SMOAK, Individually, MIKE SMOAK AS CPCS BOARD MEMBER, 1999-2007, “Sect Member”;

- (20) MICHAEL JOHN CORBIN, Individually, MICHAEL JOHN CORBIN AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, “Sect Member”;
- (21) RONALD L. BECK, (a.k.a. Ron Beck) INDIVIDUALLY, REVEREND RONALD L. BECK, AS SENIOR PASTOR, OF FBCCP, RON BECK, AS PASTOR /MEMBER OF FBCCP AS OF CPCS SCHOOL BOARD, RON BECK, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER, (PACM), AS BY-LAW’S PASTOR/MEMBER OF ALL COMMITTEES OF FBCCP AND CPCS, “Sect Member”;
- (22) WILLIAM T. BROWN, (a.k.a. Bill Brown), INDIVIDUALLY, REVEREND WILLIAM T. BROWN, OF FBCCP AS PASTOR OF EDUCATION AND ADMINISTRATION;
- (23) HERMAN MEISTER, INDIVIDUALLY, REVEREND HERMAN MEISTER, AS PASTOR OF SCHOOL MINISTRIES, OF FBCCP; HERMAN MEISTER AS CPCS EMPLOYEE AND SCHOOL BOARD MEMBER, HERMAN MEISTER AS BY-LAW PASTOR/MEMBER OF ALL COMMITTEES OF FBCCP/CPCS, AND AS “PACM”, “Sect Member”;
- (24) GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE(1997-2005) DEACON AND GARY LEATHERMAN AS MEMBER OF FINANCE COMMITTEE OF FBCCP AND GARY LEATHERMAN AS

- MEMBER OF PERSONNEL COMMITTEE, OF FBCCP, AND AS “PACM”, “Sect Member”;
- (25) ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; ROBERT GILES AS FBCCP DEACON, ROBERT GILES AS MEMBER OF THE CPCS SCHOOL BOARD, AND AS “PACM”, “Sect Member”;
- (26) FRANK EDWARDS, INDIVIDUALLY, FRANK EDWARDS AS FBCCP FINANCE COMMITTEE MEMBER, AND AS “PACM”, “Sect Member”;
- (27) MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP; “Sect Member”
- (28) MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMATE, AS CHAIRMAN OF DEACONS, 2000-2001, OF FBCCP; “Sect Member”;
- (29) GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS “Alias” CORPORATION PRESIDENT, AND AS TRUSTEE (at all times), GEOFF SMITH AS FBCCP DEACON; GEOFF SMITH, AS CHAIRMAN OF PHASE I COMMITTEE; FBCCP Registered Agent (succeeding John Grant), “Sect Member”;
- (30) DR. LON LYNN, INDIVIDUALLY, “Sect Member”;
- (31) KAREN HARROD TOWNSEND, Individually, KAREN

- HARROD TOWNSEND AS EMPLOYEE OF CPCS/FBCCP,
“Sect Member”;
- (32) PAULA POWELL, Individually, PAULA POWELL AS FBCCP
FINANCIAL SECRETARY EMPLOYEE, PAULA POWELL AS
CPCS SCHOOL BOARD MEMBER, “Sect Member”;
- (33) CARL (BUDDY) RAWLS, Individually, CARL(BUDDY)
RAWLS, AS MEMBER OF THE LONG RANGE PLANNING
COMMITTEE FBCCP, AND DEACON, “Sect Member”;
- (34) DUANE MILFORD, Individually, DUANE MILFORD AS LONG
RANGE PLANNING COMMITTEE MEMBER OF FBCCP, AS
PERSONNEL COMMITTEE MEMBER AS CHAIRMAN,1997,
AND AS “PACM”, “Sect Member”;
- (35) KAREN JEFFERS, Individually, KAREN JEFFERS AS
EMPLOYEE AS SCHOOL PRINCIPLE OF CPCS/FBCCP,
[However never elected per the Due Process of the By-Laws and
with objection of Townsend per the Nominations Committee],
“Sect Member”;
- (36) GAYLE LYNN, Individually, GAYLE LYNN, AS EMPLOYEE
AS DEAN OF STUDENTS CPCS/FBCCP, “Sect Member”;
- (37) APRIL BECK, Individually, APRIL BECK, AS EMPLOYEE OF
CPCS/FBCCP, “Sect Member”;
- (38) JIM LEAHY, Individually, JIM LEAHY AS PERSONNEL
COMMITTEE CHAIRMAN OF FBCCP, JIM LEAHY AS

- DEACON FBCCP, “Sect Member”;
- (39) JOE KAREAS, Individually, AS City Tampa Police Officer;
- (40) JACKIE CORBIN, Individually, JACKIE CORBIN AS CPCS
SCHOOL BOARD MEMBER 2007, “Sect Member”;
- (41) JOYCE MEISTER, Individually, JOYCE MEISTER, AS
EMPLOYEE OF CPCS/FBCC, “Sect Member”;
- (42) JACKIE HOWLETT, Individually, JACKIE HOWLETT AS
CPCS SCHOOL BOARD MEMBER, JACKIE HOWLETT AS
MEMBER OF THE LONG RANGE PLANNING COMMITTEE
FBCCP, “Sect Member”;
- (43) MIKE SHAR, Individually, “Sect Member”;
- (44) DON BECK, Individually, DON BECK, “Sect Member”;
- (45) JOHN COLLINSON, Individually, JOHN COLLINSON, AS
DEACON, “Sect Member”;
- (46) BILL CRAFT, Individually, BILL CRAFT, AS DEACON, BILL
CRAFT AS 2007 CHAIRMAN OF THE FINANCE
COMMITTEE, “Sect Member”;
- (47) ED HOPKINS, Individually, ED HOPKINS, AS Deacon, “Sect
Member”;
- (48) JERRY MILLER, Individually, JERRY MILLER, AS Deacon,
“Sect Member”;
- (49) WILSON SMITH, Individually, WILSON SMITH, AS Deacon;
“Sect Member”;

- (50) DAVID POWELL, Individually, DAVID POWELL, AS DEACON, (Inactive 2007) “Sect Member”;
- (51) MIKE POWELL, Individually, MIKE POWELL, AS DEACON, “Sect Member”;
- (52) MIKE HOLNESS, Individually, MIKE HOLNESS, AS “Sect Member”;
- (53) MARK JEFFERS, Individually, MARK JEFFERS, AS “Sect Member”;
- (54) THE FIRST BAPTIST CHURCH OF CITRUS PARK BOARD OF DEACONS OF 1994- 2012; Individually and as A Officers Board and as “Sect Members”;
- (55) DAVE FERGUSON, Individually, DAVE FERGUSON, AS PASTOR/OFFICER ET AL., “Sect Member”;
- AS THESE SELECT MEMBERS AND OFFICERS ABOVE (Tim Jeffers –Dave Ferguson) AS ALSO AS GENERAL MEMBERS residing in Hillsborough or Pasco Counties self-dealing with malice with their co-participants to obstruct justice to these Plaintiffs;
- (56) DR. LON LYNN, Individually, Dr. Lon Lynn, A MEDICIAL DOCTOR, per Florida Statues §766, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Hillsborough County, Florida and an employee, director/officer/agent of Dr. Lon Lynn M.D.. a Florida Professional Association acting

within the scope of his agency, the Florida Supreme Court, and lawfully served by Certified Mail in July and August of 2000, to stop his illegal practice aiding and abetting his co-participants for self-dealing with malice to obstruct these Plaintiffs.

E. DEFENDANTS IN THIS SECTION ARE INCLUDED HEREIN THIS COMPLAINT AS LISTED IN THE ABOVE CAPTION OR IN THIS COMPLAINT IN THEIR INDIVIDUAL AND IN THEIR AGENCY PERSONS AS CITIZENS OF THESE UNITED STATES WHO FOR SELF-DEALINGS WITH MALICE KNOWINGLY AND WILLFULLY HAVING BEEN DULY WARNED OBSTRUCT AND DAMAGE THESE PLAINTIFFS AS:

THE ESTATE OF DON HARROD; STEVE HARROD KEITH HARROD, NORMA HARROD;
THE OFFICE OF THE PRESIDENT OF THE FLORIDA BAR,
HENRY M. COXE III, INDIVIDUAL,
HENRY M. COXE III, AS PRESIDENT OF THE FLORIDA BAR
THE FLORIDA BAR OFFICER OF TAMPA BRANCH OFFICE
EXECUTIVE/DISCIPLINE DIRECTOR AS BRANCH STAFF COUNSEL,
JOHN ANTHONY BOGGS, INDIVIDUALLY, AS A MEMBER OF THE FLORIDA
BAR SINCE 1978
JOHN ANTHONY BOGGS, AS THE FLORIDA BAR DISCIPLINARY
PROCEEDURES EMPLOYEE
TIMOTHY PATRICK CHINARIS, INDIVIDUALLY, AS A MEMBER OF THE
FLORIDA BAR SINCE 1986
TIMOTHY PATRICK CHINARIS, AS THE FLORIDA BAR DISCIPLINARY
PROCEEDURES EMPLOYEE
THE FLORIDA BAR TAMPA INTAKE STAFF COUNSEL EMPLOYEE, MS.
"DOE" LIEMAN, MS. "DOE" LIEMAN, Individually,
THE FLORIDA BAR TAMPA INTAKE STAFF EMPLOYEE MS. JANE CRISTY and
Ms. JANE CRISTY, Individually
SANTA ROSA COUNTY DEPUTY DETECTIVE RYAN, Individually and AS Deputy
SANTA ROSA COUNTY DEPUTY WHEELER, Individually and AS Deputy
SANTA ROSA COUNTY SHERIFF' DEPARTMENT
SANTA ROSA COUNTY, OF THE STATE OF FLORIDA
HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA
THE HILLSBOROUGH COUNTY FLORIDA BOARD OF COUNTY

COMMISSIONERS JOINTLY AND INDIVIDUALLY AS,
ROSE FERLITA,
KEN HAGAN,
KEVIN WHITE,
AL HIGGINBOTHAM,
JIM NORMAN,
BRIAN BLAIR,
MARK SHARPE AND
PAT BEAN, AS HILLSBOROUGH COUNTY ADMINISTRATOR
PAT BEAN ATTORNEY AT LAW AND
PAT BEAN, INDIVIDUALLY
THE SECOND DISTRICT COURT OF APPEALS and JUDGES OF THE SECOND
DISTRICT COURT OF APPEALS AS “PERSONS” JOINTLY AND AS
“PERSONS” INDIVIDUALLY AS,
STEVAN T. NORTHCUTT,
CHARLES A. DAVIS,
CRAIG C. VILLANTI,
DOUGLAS A. WALLACE,
EDWARD C. LaROSE,
CAROLYN K. FULMER,
CHRIS W. ALTENBERND,
PATRICIA J. KELLY,
MARVA CRENSHAW,
DARRYL C. CASANUEVA, Individual, Alias Honorable Chief Justice of the 2DCA
JAMES BIRKHOOD, INDIVIDUALLY AND AS CLERK OF THE SECOND
DISTRICT COURT OF APPEALS, LAKE LAND FLORIDA
THE FLORIDA SUPREME COURT, AND JUDGES OF THE FLORIDA SUPREME
COURT AS JUDGES AND AS “PERSONS” JOINTLY AND “PERSONS”
INDIVIDUALLY AS,
CHIEF JUDGE FRED LEWIS,
CHARLIE T. WELLS,
HARRY LEE ANSTEAD,
BARBARA J. PARIENTE,
PEGGY A QUINCE,
RAOUL G. CANTERO,
KENNETH B. BELL
KMART CORPORATION also d.b.a. SEARS HOLDING COMPANY, INC.(Kmart)
JOE PALKO, Individual, JOE PALKO, EMPLOYEE AS Vice President (Kmart)
SEARS HOLDING COMPANY
RANDY BRIGHT, Individual, RANDY BRIGHT, (Kmart) EMPLOYEE AS
REGIONAL COACH,
KEITH JOHNSON, Individual, KEITH JOHNSON, (Kmart) EMPLOYEE AS
REGIONAL HUMAN RESOURCES DIRECTOR,
SHANE PEARSON, Individual, SHANE PEARSON, (Kmart) EMPLOYEE AS LOSS
PREVENTION COACH,
KATHERINE CUNNINGHAM, Individual, KATHERINE CUNNINGHAM, (Kmart)

EMPLOYEE AS DISTRICT COORDINATOR SECRETARY
DANIEL J. GENTILE, Individual, DANIEL J. GENTILE, (Kmart) EMPLOYEE AS
DISTRICT COACH
DOUG LIVINGSTON, Individual, DOUG LIVINGSTON, AS KMART EMPLOYEE
LOSS PREVENTION COACH, AT STORE 3092,
ROY ALLEN, Individual, ROY ALLEN, KMART EMPLOYEE AS ASSISTANT
COACH, AT STORE 3092,
DR. LINDA ROWE CAMPBELL, Individual, DR. LINDA ROWE CAMPBELL,
(Kmart) EMPLOYEE AS PHARMACIST AT STORE 3092
BARBARA BOOTH, Individual, BARBARA BOOTH, (Kmart) EMPLOYEE AT
STORE 3092
MIKE SHUMATE, Individual, MIKE SHUMATE, AS AN OFFICER OF THE UNITED
STATES COAST GUARD now retired,
“DOE”, as any and all Insurance and or Bonding Companies, Carriers or the like for any
Defendant or representative of any Defendant herein, past, present or future.
“DOE”, as any yet unknown accomplice to the acts of defendants herein,
JANET E. COATS, Individually, JANET E. COATS AS EXECUTIVE EDITOR AND
VICE PRESIDENT OF THE TAMPA TRIBUNE
MICHELLE BEARDEN, Individually, MICHELLE BEARDEN, AS TAMPA
TRIBUNE REPORTER/EMPLOYEE
THE SAINT PETERSBURG TIMES,
BILL COATS, Individually, BILL COATS, AS A SAINT PETERSBURG TIMES
EMPLOYEE/REPORTER
PAUL TASH, Individually, PAUL TASH, AS SAINT PETERSBURG TIMES,
EDITOR, CEO and CHAIRMAN
DARRYL C. CASANUEVA, Individual, Alias Honorable Chief Justice of the 2DCA
AND OTHERS “DOE” STILL TO BE NAMED UPON COMPLETED DISCOVERY:

JURISDICTION

3. This court has subject matter jurisdiction pursuant to the ALL WRIT ACT per 28 U.S.C.A. §1651 “all courts established by Congress may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law”. This court has jurisdiction pursuant to 18 USC 1961 (RICO), 18 USC 1346 (fraud and honest services), 18 USC 1951 (interference with commerce), Title 15 of the United States Code pertaining to restraint of trade and monopolies (anti-trust law), 28 U.S.C.A. §1367 (to hear and decide claims arising under state law) and 42 U.S.C.A. §§1983 and 42 U.S.C.A. §§1985(3) and

42 U.S.C.A. §§1988, and Title VII of the Civil Rights Act of 1964, 42 U.S.C.A. §§2000(e) and 42 U.S.C.A. §§1981 (Race) and the First, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh, Thirteenth and Fourteenth Amendments to the United States Constitution and Rule 23, Federal Rules of Civil Procedure (class action). This claim involves the above violations of U.S. Constitution Articles and Florida Constitution Article I. Section 3. to protected persons and applicable State of Florida codes and laws confirming intentional deprivations, detainment and denial of Civil Rights by the Florida Supreme Court Justices, Governors and State Employees. Jurisdiction is founded on 28 U.S.C.A. §§ 1331 and 1343(a)(3) and (4). The amount in controversy in this case, excluding interest and costs, exceeds the minimum jurisdictional limit of this Court for each count. Plaintiffs act as a Respondent to Federal and State Criminal Charges per Malicious Prosecution and violations of Due Process to violate Religious RIGHTS, Racial Discrimination and Voter Rights by frauds. This complaint may be pleaded in the alternative pursuant to Federal Rule of Civil Procedure 8(e)(2) Fed. R. Civ. P. 8(e)(2)) as Fed. Ct. Rule 14, allows jurisdiction.

VENUE

4. This court is the proper venue for this action, based on the various causes of actions having arisen and based on these parties business practices and location in the geographical area serviced by this court operating to do most of their acts/omissions inside the jurisdiction and venue of this Middle District and Northern District Of Florida Court pursuant to 28 U.S.C.A. §1391(b) and 28 U.S.C.A. §2201 as Defendants and “Others Doe” continue violations of U.S.

Constitution Article III. “Good Behaviour” and Article XIV. Section I. State violations of Rights and “Due and Equal Process”.

THE FACTS

5. Defendants owes Plaintiffs a duty of care pursuant per: our contracts; our laws and their Oath or Affirmation as a Fiduciary to provide Honest Services for which they were/are retained and or paid or as Members and or Tortfeasors to the FBCCP By-Laws as of 1993 and before.

6. All the acts/omissions of Intentional conduct and negligence and “Bully” torts in this action for relief and restitution as described below against these Indited participants who still continue willful blindness for aiding and abetting frauds evident by their: own words; Quid Pro Quo Actions; and biased conflicts of interest; abductions of children and property and other illegal acts/omissions detailed herein and “other” acts not yet exposed because in collusion participants conceal discovery as “Honest Services Frauds” per 18 USC §1346 and 18 USC §1341 and §1343 by frauds of Public Officials and Employees “Transacting their affairs” and conspiring in 18 USC §1503 Obstruction of Justice as Racketeer Influenced and Corruption Organization Act 18 USC §§1961-1968 and specifically §1964 (C) as stated in F.S.817.034 (Florida Communications Fraud Act) and the Florida Torts Claims Act affected a waiver of defendant’s sovereign immunity and relate to that certain action(s) known as:

(A) **Randall Townsend v. Charles E. Lane, Jr., d/b/a SABAL MARKETING**
CASE NO. CI 88-2554-CA-03-08, IN THE CIRCUIT COURT OF THE 18th
JUDICIAL CIRCUIT IN AND FOR SEMINOLE COUNTY FLORIDA,
suing for: Breach of Contract; Specific Performance; Interference with the

Advantageous Business Relationship; Unjust Enrichment; and An Accounting as first intentionally violated by Charles E. Lane Jr. a/k/a and d/b/a Sabal Marketing (Lane) operating illegally per F.S.686.201 (Commission Representative) in conspiracy operating for illegal purposes with Lanes childhood friend and attorney Charles E. Williams, Jr. and creating an August 7, 1987, “Joint Venture Business Agreement” with Townsend d/b/a “Future Marketing” and with Defendants and “Others Doe” who still conspire in illegal non-honest practices and as admitted confirming claims Townsend has made since 1988, by:

(1) Florida Bar Assistant Staff Council John Root Jr. stating:

“This is the worse case of abuse I have seen by an attorney on a client in my over 27 years investigating cases for the Florida Bar but my boss has told me to close this case and never talk to you again. Good-Bye!”;

(2) 5th DCA Judges Orginger, Lawson and Sawaya as now confirmed by their ruling in *Robinson v. Weiland, ET AL*, 5D05-2380, 9/1/2006, vindicating Townsend in citing Townsend v. Lane 659 So. 2d 720 (Fla. 5th DCA 1995) and;

(3). Chief Justice Canady recusing himself upon being duly informed recused the 2nd DCA, 5th DCA, The Florida Supreme Court and “others” and empowered per Florida Supreme Court Article V. Section 3. “others” as Jackson, Grate and Jenkins and as 2DCA Chief Judge Darryl C.

Casanueva per his order of June 1, 2011, who still “impede” Townsend ET AL and Justice and fail to provide “Honest Services”;

(4). Judge Marva Crenshaw admitting to aiding their criminal acts;

(5). Bruce E. Chapin admitting the McKay Plot and deprivations;

- (6). David H. Popper admitting he conspired in malfeasance;
- (7). David Gibbs, III aiding, abetting and admitting to the McKay Plot;
- (8). Charles Scruggs, aiding, abetting and admitting to the McKay Plot;
- (9). Heather M. Gray, disbarred for her acts as in the McKay Plot;
- (10). And others admissions even now as Defendants named herein.

(B.) FBCCP EMINENT DOMANIN AND ZONING VARIANCE CASES as the “Sect” with their “Sect Agents” committed: (a) Detainment of the FBCCP Corporation’s and “The Members as the Body’s” Religious Process and Free Will and Civil Constitutional Rights by: Omissions; Frauds; Conspiracy; Illegal use of Government Property; battery; abuse of process; breach of contracts; extortion; negligence in the care of minors; intentional interference with child custody and kidnapping; abuse of the elderly; (b) Larceny for “Self Dealing” and Unjust Enrichment of FBCCP and Members Property and Tax Payers Property;

(C.) All Defendants to said points in time, in collusion filed “Fraudulent Sham Actions” as “Abuse of Process” and Malicious Prosecutions then in Hillsborough County Florida willfully using Ronald L. Beck v. Randall Townsend Case 01-15813, Claiming **Repeat Violence** and Karen Townsend v. Randall Townsend, Case 01-15814, Claiming **Domestic Violence** as based with Federal Charges as Judge Raul Palomino on November 15, 2001:

- (1) heard the “ineffective services” and “conspiracy” and “alleged legal arguments” of Charles H. Scruggs, III and “others” illegally via ex-parte meetings for extrinsic fraud conspired to conceal evidence and at trial;
- (2) dismissed the temporary Injunctions and all charges by Defendants ET

AL against Randall Townsend;

(3) Also Judge Palomino “On the record” per the transcript, warned all Defendants to stop interference with child custody and civil rights and other violations of laws and contracts but such violations of law and the Court Ruling still are ongoing in 2012;

And additionally, On 1/4/2002, Judge Palomino admitted the “ineffective services” of Scruggs stating “Your attorney should have argued that....”

upon being presented with Townsend’s as Pro Se claiming:

“MOTION FOR DISMISSAL AS SHAM PLEADINGS AND MOTION FOR DAMAGES ...1. Petitioner, Ronald Beck, offered no evidence of Domestic Violence in said petition and in verbal testimony before this Honorable Court and in said testimony did freely affirm that: “No. And this is not about physical harm, sir.” As stated on page 9, line 10 and on page 10, lines 20-25 in the attached transcript of the hearing of November 15, 2001. 2. Respondent prays if the Court allows, Petitioners response to the attached questions will clearly prove that Petitioner is only seeking to keep his frauds from being unraveled and that the use of this court and “Fraud on the Court” was seeking a Domestic Violence Injunction only to prohibit “fact finding” in the pending Libel and Slander and Defamation Lawsuit and avoiding this Petitioner additional embarrassment from the fruits of his own negligence and ill will towards this Respondent....”

Additionally, Respondent Townsend alleged and proved additional criminal acts of the co-participants as larceny, frauds, batteries, and other criminal acts by these Defendants just to Outrageously inflict emotional distress and conceal their previous crimes to Townsend (Now proved by Judge Orfinger’s ruling in **Robinson in 2006, as Gibbs, Grant, Scruggs, and Gray was retained and paid to affirm**) and even to the children and FBCCP/CPCS Members and “others”, yet Judge Palomino intentionally for himself and the frauds and conspiracy for Scruggs and “others” failed and still intentionally and knowingly fails to provide “Honest Services”;

(D.) Defendants then by and with their willful and knowing co-participant Karen Harrod Townsend did file Divorce Case **Karen Townsend v. Randall Townsend** 02-4974, Hillsborough County Florida and for these Related cases listed above and included herein to expose the pattern of acts/omissions by Defendants using the alias “Family” Court alias “Honest Judges” following rules of law rather than per the law a Civil Court or a Criminal Court with an biased Jury Process to still conceal their: contract breaches; illegal and felony acts and abuse of process rather than follow our Laws and thus this need for Class Action status as these Florida Bar Officers and Members and “others” have formed a “McKay Plot” to deprive and “Obstruct” all citizens of Florida of our Constitutional Rights.

7. Per the pattern of Defendants Mens Rea Criminal Enterprise as a failure to provide “Honest Services”, Bruce E. Chapin ET AL with and for his wife Linda Chapin, his law firm and law partners of O’NEILL, CHAPIN, MARKS, LIEBMAN & POPPER, P.A. with John Harkness and John Berry and Governor Lawton Chiles and Governor Buddy McKay and “others” aided and abetted and grant immunity to themselves and “others” who aid and abet the malfeasance of David H. Popper, Esquire, Charles E. Lane Jr. and “others Doe” and are knowingly joined, instructed, aided and abetted by Defendants to do: crimes; use a 1988 “Sham” Counter-suit, through 2001 and 2002 through 2011 filing more “Sham” Claims and illegal Operational nondiscretionary actions and “arbitrariness actions” by participants and “others Doe” acting through and with alleged “Clergy” Ron Beck ET AL and “Law Enforcers” as a sect with sect agents for “false public light Defamation” (01-15813 claiming Repeat Violence) in conspiracy with the estranged and deranged wife Karen Harrod Townsend ET AL (01-15814 claiming Domestic Violence)

and a divorce action (02-4974) for intrinsic and extrinsic frauds by their McKay/Chiles Revenge Plot with co-participants for a criminal enterprise plot as an extortion, larceny, detainment and Malicious Prosecution against Townsend for Defendants concealing intentionally illegal acts/omissions of: Lane; Lane's Attorney, Charles Williams, Jr.; Townsend's Attorney, David H. Popper ET AL and David Gibbs III and Attorney Bruce Chapin ET AL conspiring with Florida Governors, Judges, Florida Bar Officers and Members and others as some named herein and "others Doe" [hereinafter "**CHAPIN ET AL**"] to conceal their illegal acts/omissions "**McKay Plot**" "Under Color of Law for an attempt to fulfill an employment-related duty per *Hennagan v. Dept. of Highway Safety* 467 So2d 748, 750 (Fla. 1st DCA 1985 affirming Vicarious Liability as Defendants per *KAISNER V. KOLB* 543 So2d 732, 1989 Fla. SCT 2682 who supervised co-participants abusing Plaintiffs by: "Failure Of Honest Services"; Omission(s); Fraud(s); Unjust Enrichment; Illegal Political Gain; R.I.C.O Acts/omissions violating "DUE PROCESS" as the U.S. Supreme Court per *Swann v. Charlotte-Mecklenberg Bd. Of Ed* 402 U.S.1 (1971 gives this Federal Court broad powers for Equity and Relief for all these Plaintiffs deprived and still damaged because of the criminal enterprise now admitted by: F.S.Ct. Chief Judge Canady himself; 11th Circuit Court of Appeals; 5th DCA judges; and "Others"; and these as Chapin ET AL and "others Doe" who continue to defame and deprive Townsend in a "False Public Light" to conceal their Mens Rea Legal Malfeasance and Lack of Honest Services to Townsend and or as Townsend ET AL since Acts in 1987, are still ongoing by these co-participants and "others".

8. Townsend as for all Plaintiffs acts to protect The State Of Florida and all citizens as from illegal government persons acts/omissions and "Hate Crimes" violating Secured

Contract Rights and from “Risks” stated per *The 1992 American Bar Association’s McKay Commission Report* addressing and exposing the agenda of the: Buddy McKay; Chapin(s); Chiles; Harkness; Berry; Bush(s); Crist; FDLE; A.G. Pam Bondi; Florida Supreme Court Judges; 5th DCA, 2nd DCA, 13th Circuit Court, Judges; The Florida Bar Officers with “others Doe” political criminal enterprise [hereinafter as the “**McKay Plot**”] as warned as a “Risk” to citizens by the U.S. Supreme Court’s unanimous ruling in *Keller v. State Bar of California* 496 U.S. 1 (1990) that a State Bar shall not immune itself by selective applications of its rules and acts/omissions to promote its own: agenda; political purposes; and or criminal enterprise; using: Chapin ET AL as with Harkness; Berry; Bar Members; Governors; “alias Law Enforcers”; and “others” as their agents to violate Federal Criminal Laws, “Other Laws” and Government Programs, Tax and Election Laws and detain and violate the Constitutional Rights of non Bar members and “Others”. Or as in this case now admitted by F.S.Ct. Chief Judge Canady and “others” and proved used and still uses its own “agents” of the illicit relationships for these 1987-ongoing “McKay Plot” crimes “Under Color of Law” violating “Due Process” and Legal Rights protected by: Our Contracts; The U.S. Constitution; The Florida Constitution; FBCCP By-laws; Civil Rights Act of 1964 and Section §1983 of Title 42, U.S.C. stating:

“...which provides that any person who, under the apparent authority of state law, deprives another of any rights, privileges, or immunities secured by the United States Constitution and the laws will be liable to the party injured...”

And Per *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.”

And Per United States v. Nixon 418 U.S.683, 686 (1974) likewise exposing and inditing President George W. Bush unlawfully aiding and abetting with his alleged Federal powers with his brother Jeb Bush and Charlie Crist ET AL. in their illegal actions.

9. Townsend for Plaintiffs per contracts since 1988 demands our lawyers and “law enforcers” and “others” provide the Honest Services they agreed to perform, when paid, retained or elected and as the: 11th Circuit Court of Appeals (2008), Florida Supreme Court and The Florida Bar (2009); Chief Judge Canady (Rulings in 2011); Florida 5th D.C.A (Ruling in **Robinson v. Weiland, ET AL**, id., 9/1/2006 not found until or about 2011 and but could not be Discovered as an element of the Chapin ET AL conspiracy until **the reversal** of 5th DCA Judge Orfinger and the F.S.Ct. Rulings in 2011); and the 2nd D.C.A (2011); and 13th Circuit Court Judge Marva Crenshaw (2006); in this case has connected and Affirmed these Defendants: “Prejudice”; Crimes; Conspiracy for and Intentional “Ineffective Counsel” as “Lack of Honest Services to clients” as facts herein detail Defendants and “others” “McKay Plot” for intentional willful criminal acts/omissions and unethical and illegal motives as the specific ruling on these specific facts shows their conspiracy to avoid Townsend’s denied Rights and Claims even named in **Robinson** id. as:

“(“[Where the moving party’s allegations raise a colorable entitlement to rule 1.540(b)(3) relief, a formal evidentiary hearing on the motion, as well as permissible discovery prior to the hearing, is required, ”); **... Moreover, the courts have held that the hearing requirement applies when fraud is asserted as a grounds for relief under either rule 1.530 or 1.540, Florida Rules of Civil Procedure.**”

yet in collusion Chapin ET AL with the “Alias” “Honest Serving” judges who in bias answered to Chapin’s wife Linda who by her vote as Chairwoman of the Orlando County Commission, rewarded them per the Orlando Sentinel with a new Orange County

courthouse Bruce Chapin admitted for blocking Townsend's discovery demands on Lane/Sabal, which when produced proved Defendants illegal actions. Chapin ET AL admits to continuing to block discovery of FBCCP/CPCS Records, Townsend's own children's School and School Loans and Medical Records and or Public Records showing Quid Pro Quo illegal acts and never allowed any formal evidentiary hearing actions even still now in 2012.

10. As a result of Defendant's failure to perform: Honest Services; negligence; torts; and breach of duty; to Plaintiffs: Randall Townsend; J.G.T; J.D.T.; FBCCP/CPCS a Florida §617 Corporation "Not For Profit"; and its non-sect members; and "others" as Citizens of Florida; and "others as Tax Payers"; Plaintiffs interests have been injured and still suffer: Physical and Religious detainment; Malicious Prosecution; financial and Civil Rights damages still not fully tabulated without more discovery these same "alias law enforcers" and "others still impede by "fixing" cases and produce false FBCCP Records and other known false records and omit to produce true records to conceal themselves. Such occurrence relating to the assignment of duties undertaken by each defendant represents a breach of contracts on defendant's part, breach of defendant's fiduciary relationship to plaintiff's, and violates defendant's professional standards and thus are criminal acts for which a non participant would demand and pursue Felony Charges and not obstruct justice under color of law for their own unjust enrichment.

11. Per Contracts as the Florida Constitution and Florida Statues, Plaintiff's are entitled to Recover: attorneys fees; costs; relief and reimbursement from these estopped Defendants conspiracy and Larceny of obtaining property by intentional fraudulent services; and show cause for rights of punitive damages and Government Persons loss of

Rights, Entitlements and Pensions.

12. Townsend for all Plaintiffs and thus the need for Class Action alleges and believes specifically as proved by the *Robinson v. Weiland, ET AL*, id. rulings that Defendants Bruce E. Chapin (Chapin ET. AL.) and as Special Mediator of the Florida Supreme Court with and for his wife Linda Chapin as Chairwoman of the Orlando County Commission being vetted as running mate with Buddy McKay for Governor conspired to conceal the malfeasance, negligent acts and omissions of Townsend's Attorney David H. Popper, Charles E. Williams, Jr. and Charles E. Lane, Jr. and enlisted: Judges Rom Powell, R. James Stroker and Others; Florida Bar Officers and Members under the "Operational" directives of John Harkness and John Berry and other members; FDLE Officers and Members under the directives of Guy Tunnell and Gerald Bailey, and Hillsborough County State Attorney Mark Ober, his Full Time and Part Time F.S. 27.18 Assistants to State Attorney's and F.S.181, Assistant State Attorneys and F.S.27.251 Special organized crime investigators and "others Doe" and County Attorney Pat Bean also later acting as Hillsborough County Administrator until her termination by the Hillsborough County Board of County Commissioners for exactly the same type unconscionable acts as Townsend for and per the FBCCP Membership beginning about October 1994, Demanded disclosure from FBCCP Administrator Elbert Nasworthy, Ron Beck, Joe Howlett, Tim Jeffers, Gary Leatherman, Paula Powell, John Grant, David Gibbs III, FBCCP and CPCS Officers and "others" at various related times as named herein and "Others doe" individually for themselves and for their agents/ co-participants individually and collectively and thus Defendants and "others" collectively, routinely aid and abet their criminal practice as "Fraud, Collusion and Arbitrariness" to conceal themselves to

deprive and divest Citizen Plaintiffs of our Children, Rights and “other Properties” to fuel their ‘self dealing’ pride, economic profits and powers to win elections rather than serve those for whom and by they were elected or retained as custodians and officers of our laws as Harkness, Berry and their “agents” are the conduit in collusion of and with all violators but themselves conceal themselves in their illegal enterprise since about 1991 with Attorney David Gibbs III and at later times with: Florida Senator John Grant; Bush(s); Charlie Crist ET AL; Charles H. Scruggs III; Heather Gray (disbarred 2009); Mark Ober, David Gee, Jim Coats, Pam Bondi, Dickinson & Gibbons P.A., ET AL until the 2011 orders, admissions and indictment by their Florida Supreme Court Chief Judge Charles Canady who upon being served sworn affidavits admits this McKay Plot.

13. Townsend for all Plaintiffs per contracts now reports and demands restoration of our Contracts rights “impeded” by crimes of Chapin’s ET AL and Buddy McKay ET AL Conspiracy with those of the “McKay Plot” as Florida Bar Members John Harkness and John Berry ET AL, David Gibbs, III and John Grant, Jr. since 1991, with FDLE, HCSO and “others” of or as FBCCP Sect Deputies Jeffers, Howlett, Smoak, Corbin; and their Superior alias law enforcers, with Judges as Defendants and “others doe” to stop: Fraud(s); U.S.C. CODES Violations; DETAINMENT; F.S.§817.02 (Grand Larceny); F.S.§817.15 (Making False Entries, etc., on books of corporation); Stop “impeding” our Contract Rights to review our own Business Records being used to defraud us; and doing F.S.§817.034, for self dealing as criminal acts/omissions and ethically not do torts to: FBCCP By-Laws; State and Federal Law that protect “The Body” and citizens Rights albeit as Plaintiffs interests are being subjected to Defendants Mens Rea “fraud, collusion and arbitrariness” and Plaintiffs per F.S.817.21 (**Books to be evidence in such cases.**)

demand our right of inspections per F.S. 112 and 119, and Fed.R.Civ.P. 37 (b)(2) and the Freedom Of Informations Act to expose their now admitted Quid Pro Quo RICO Enterprise of these Defendants and “others” yet to be exposed.

14. Townsend for all Plaintiffs alleged, affirms and believes the admissions of Florida Supreme Court Chief Judge Canady now in 2011 **indicts himself and all Defendants** and “others” in this “McKay Plot” with now proved acts/omissions as: Larceny; F.S. §501 Part II. Frauds; Malicious Prosecution; Actual, Subjective, Legal Malice; Extortion; Corruption of by a Political/Government Officer; Abduction; Detainment; F.S.777.201, **Entrapment, Obstruction**; U.S.C. violations and collusion by Defendants and “others” as tort negligence by not providing “Honest Services” to violate Civil Rights as R.I.C.O. patterns began by Lane in 1987 and willfully assisted by all Defendants and “others Doe” to impede Townsend from: (1) his Rights and Sales Commissions; (2) Defame Townsend in a “false public light”; and as (3) Intimidation to “Others” to abduct/detain Townsend from 1999-now his children and FBCCP Duties to the FBCCP Corporation and “The Body” (4) produce a “False Public Light” and any Fraud necessary; (5) violating Plaintiffs from our “Free Will”, Religious Will and Votes since about 10/1994 and still in “fraud, collusion and arbitrariness” (5) Florida Bar Officers Harkness and Berry via Bar Members, Governors and alias “Law Enforcers” as “Sect Agents” FBCCP Attorneys David Gibbs, III, Registered Agent Florida (Former) Senator John Grant Jr., Charles Denny IV and Deputies Jeffers, Howlett, Smoak, Corbin and Sheriffs, FDLE, judges, County Officers directed by Chapin(s); Charles H. Scruggs III; Pat Bean and now Attorney General Bondi, FDLE Gerald Bailey and “others” “Under Color of Law” in the McKay Plot by even threatening Townsend and “others” not to provide “Honest

Services” to these Plaintiffs as Defendants and “others” violate:

“**Florida Constitution Article I. Section 3.** ...Religious freedom shall not justify practices inconsistent with public morals, peace or safety. No revenue of the state or any political subdivision or agency thereof shall ever be taken from the public treasury directly or indirectly in aid of any church, sect, or religious denomination or in aid of any sectarian institution.”

“F.S. §775.03 **Benefit of Clergy.**—The doctrine of benefit of clergy shall have no operation in this state.”

“F.S. §871.01 **Disturbing schools and religious and other assemblies.** Whoever willfully interrupts or disturbs or any school or any assembly of people met for the worship of God or for any lawful purpose shall be guilty of a misdemeanor of the second degree, punishable as provided in s.775.082 or 775.083.

§871.02 **Indictments or informations for disturbing assembly.**—...

§871.04 **Advertising; religious discrimination; public places.**----...”

and prescient Florida Case Law as: **FIRST FREE WILL BAP. CH. OF**

BLOUNTSTOWN, INC. v. FRANKLIN, ET AL., 4 So2d 390, 148 Fla. 277,

stating:

“When membership was accepted therein, they submitted themselves to the ecclesiastical jurisdiction of the church...The law appears to be settled that in the absence of showing of fraud, collusion or arbitrariness on the part of the church authorities having jurisdiction of the controversy, the courts will not interfere.”.

15. Townsend alleges and now affirms and confirms all Defendants and “others Doe”

to be revealed and named later when full discovery is allowed per our Contracts Rights

that as revealed by their own patterns done in many cases against Citizens that expose the

Mens Rea corrupt patterns of these Harkness and Berry, Florida Supreme Court, JQC and

FDLE, A.G.’s as Law Enforcers ET AL as Individuals and Agents and “others” as

Defendants routinely still intentionally act/omit in corrupt conspiracy to do violations of:

Search and Seizure laws and F.S. 688 Trade Secrets and Invasion of Privacy Laws and

“Witness Tampering” Extortion Torts to Contracts/omissions and defame Townsend and

“others” in a “public light” by knowingly giving false information from themselves and

“Others” by their omissions of truthful data and known fraudulent reports alleging their

“false public light” and giving even in this case showing their devious corruption(s) by willfully and unlawfully using and giving Benefit to “alleged” Clergy and “Others” to benefit themselves as alias “clergy and honest persons” in violation of F.S.775.03 (No Benefit to Clergy Law) and others as “Corrupt Lawyers, Public Servants and Doctors” intentionally as listed per F.S.772.102 specifically: F.S.409.325 (Fraud for State and Federal government assistance); F.S.784 Assault and Battery; F.S.787 Kidnapping; F.S.812 Theft, robbery and related crimes; F.S. 815 Computer Related Crimes; F.S.817.12 Felony Torts and fraudulent practices; F.S.836.05 extortion; F.S.837 perjury; F.S.838 Bribery and misuse of public office; F.S.843 Obstruction of Justice; F.S.914.22 or 914.23 witness tampering; F.S.918.12 or F.S.918.13 tampering with jurors and evidence; 18 U.S.C. s. 1961(1)(A)(B)(C),1 or (D) and “other” crimes and escalated per conspiracy per F.S.775.085 as done to “Religious Persons” to or as Plaintiffs seeking “lawful services” as protection from non-members as “sect alias under color of law, law enforcers and “others” torts per: The Ethic Rules of FBCCP By-laws and CPCS School Handbook; Florida Bar Black Letter Rules; the U.S. and Florida Constitutions; The U.S. Code; the Florida Statues still being detained from Civil Rights and our “Free Will” by the intentionally illegally acting Lane/Williams ET AL; with Popper; Chapin’s; McKay; Harkness/Berry/Powell/Stroker/5th DCA; F.S. Ct. ET AL via 1994-now as “Sect and Sect Agents” with “Gibbs/Jeffers/Beck/Powell/Grant/others” “self dealing”: “ineffective Bar counsel”; “alias honest services by Government Law Enforcers”; and “others”; still intentionally in 2012 doing unlawful “hateful” acts/omissions as admitted “Obstructions” and as still committed by this 2011 Florida Supreme Court (F.S.CT.) and their co-participants led by Attorney’s General Pam Bondi; to conceal the illegal ploy of

themselves and their “agents” as David H. Popper, an attorney knowingly and intentionally: delayed “Honest Services“; omitted truthful disclosure and did frauds for fraud to conceal their illegal malfeasance while being paid with clients funds and was intentionally to protect the political career of the Chapin’s and liability of the O’Neil, Chapin, Popper ET AL law firm was knowingly and willfully aided and abetted by the firm as attorney Bruce Chapin for his wife’s political career, is aided and abetted by intentional operational acts of misuse of their oaths and offices of:

- A. Florida Governors Lawton Chiles with a personal direct motive and vendetta against Townsend and Buddy McKay vetting Linda Chapin to run on their Democratic Ticket for Political Offices illegally assisted Chapin(s) in multiple cases Plaintiffs as herein have discovered;
- B. Judge Rom Powell (Judge Powell) and “others” illegal self dealing and unjust enrichment since about 1991, for Chapin ET AL in collusion with Popper, Williams and Defendant Lane a.k.a. Sabal knowingly illegally using a 1988 Counter Suit to conceal Lane and their frauds and illegal acts/omissions alleging Townsend interfered with Lane Contracts that in 1992 the discovery finally produced showed the contracts/omissions as Lane claimed did not exist but honored and edified Townsend as concealed by attorney Bruce Chapin and the wife of Bruce as Linda Chapin Chairperson of the Orange County Commission, with Quid Pro Quo powers able to with Judges, Bar Members and others as “Law Enforcers obstruct lawful due process to conceal their criminal enterprise, illegal acts/omissions and create defamation against Townsend of the

conspiring Popper ET AL, as Attorney Williams and Lane/Sabal and “others as they commit: Frauds; Extortion, Refusal to obtain Lane business records per F.S.817.21, Townsend reported were used in the commission of criminal acts/omissions ; abuse of process, obstruction of justice, unlawful detainment, tort interference with Townsend’s business relationships, tort interference with collection of money owed from Townsend proved rendered “honest services” per the August 7, 1987, Joint Venture Contract and frauds and extortion torts by Popper ET AL as admitted by Townsend’s Attorney’s Patricia McCarthy and David Landis and “others” since about 1989, as per Bruce Chapin’s own writings admitting to Townsend being owed commissions on sales of over \$1,000,000.00 and more is still owed to Townsend as the 5th DCA on 9/1/2006 admitted Judge Powell ET AL even as written by his own hand in his July 11, 1994, Final Summary Judgement in case 94-632, is participating in ineffective Honest Services now exposed and admitted now in print by **ROBINSON** *id.*;

- C. Florida Supreme Court Agents as willfully admitted by Bruce Chapin in and since about 1991, per Chapin ET AL is in collusion with now known Florida Bar Officers as Harkness and Berry and other Members at multiple and various times even as Bar Officers Boggs and Chinaris admitting in 1999 to Townsend “If you ever get your law degree within 6 months we will have you disbarred and arrested for something”, tainting the entire Bar Grievance Process for and with Governors as Chiles, McKay; and

- D. Jeb Bush being fully informed in a public broadcast at WTVT Studio's Tampa, Florida in a "Town Hall Meeting" being asked by Townsend "What do you do when you know the Florida Bar is lying to you?" and then in private meeting then and at later times to him and his agents being fully informed of the Plot and the Participants now as Bush ET AL and Crist ET AL, FDLE Officers, these Government Persons and "others" in self dealing For Political Gain illegal actions to aid the Popper ET AL criminal conspiracy to deprive client Townsend as reported herein as now admitted and indited by the 11th Circuit Court of Appeals and now in 2011, F.S.CT. Chief Judge Canady, 5th DCA Judge Orfinger, Judge Marva Crenshaw and "others";
- E. Judge Palomino (Palomino) 11/15/2001, intentionally with Attorney former Judge Scruggs and Chapin Government Defendants and "others" at the directive of: Hillsborough Sheriffs Deputies led by Gary Terry ET AL; Hillsborough County Attorney and Administrator Pat Bean ET AL; Charlie Crist ET AL; and Florida Bar Members; David Gibbs ET AL; State Attorney Mark Ober and Assistant State Attorney Pam Bondi; to as Herman Meister as CPCS Pastor 2/2002 stated, "We made a pack to deny and destroy anything you (Townsend) say" so to conceal Townsend revealing their and "illegal law enforcers acts/omissions " they aided and abetting the known proved intentional criminal acts/omissions of: "the alias clergy Ron Beck and Deputies Jeffers Sect" and their "Sect Agents" even deranged estranged wife Karen Harrod Townsend concealing her

criminal acts and including multiple acts of Battery even per F.S. 741.235 (Interspousal Tort of Battery) and attempted premeditated murder and her multiple torts of “child negligence and abuses” without “Due Process” conspiring and abducting Townsend and his children and members as detained victims being maliciously prosecuted as an (1999 Baby Aisenberg Plot) example to “scare” and “intimidate” others of the power and collusion of “alias Government law enforcers” being intentionally deprived and said the knowing and willfully acting wife (Karen Harrod Townsend) with her co-participants should not continue: “tort interference with child custody”; and violating Assembly and Civil rights and they intentionally illegally by fraud aid since “FBCCP Demand Meetings” of or since 10/1994; 06/1997; 9/8/1999; 10/28/2007 and other times in collusion with these Defendants and “others” ignore Townsend’s June 2000 and 11/12/01 Faxed Letter Demanding Scruggs ET AL at trial 11/15/2001, produce the true FBCCP Corporation Records to show the criminal motives of these participants. Palomino at trial said 1/2002, “your lawyer (Scruggs and lawyers John Grant ET AL and David Gibbs ET AL) should have argued that” but using Omissions and fraudulent trickery (as Judges Powell, Stroker and “others” omitting honest services) by claiming Res Ajudicata referring to the fact that Townsend Pro Se at a 1/2002, hearing filed proofs that positions of the “Ron Beck Sect ET AL and Karen Harrod Townsend ET AL” are Intentionally by an “alias Government persons” McKay Plot, of a conspired filed “Sham” Pleadings as they with the

“fraud, collusion and arbitrariness” of Charles H. Scruggs III with Palomino ET AL on 11/15/01 and since Scruggs was retained 07/2000, and in February 2006, admitting to Judge Stoddard ET AL, “He (Scruggs) was afraid of Sheriff Deputy Howlett” and “others” (knowing and including the illegal “due process” and criminal acts/omissions of Popper/Chapin/Chiles/ The Florida Bar/Bush/Crist as Crist ET AL) and therefore intentionally did: (1.) not provide “Honest Services” (i.e. “Get True FBCCP Records exposed” or “Bring the Church Matters into the Divorce” and “Did Illegal Injunctions for Child Detainment”); (2.) omit exposure of the violations of law by Lane/Popper/Chapin/Chiles ET AL or expose the deprivations done to Townsend and his children’s Public Light from false allegations of Defendants that Townsend “was dangerous with guns and had suffered a mental breakdown” due to the “McKay Plot” by Popper/Chapin/Chiles ET AL, or trying to assist Townsend reporting criminal acts/omissions by Defendants harming the Townsend Children so Townsend could have custody) or it would damage and expose the Popper/Chapin’s ET AL McKay Plot and Scruggs and “other Government Persons” Quid Pro Quo Bar Status and money from co-participants to continue the frauds since began by Lane/Popper ET AL with bribery and extortion created by Lane ET AL; (3.) willfully and intentionally participated and still participates in the continued conspiracy for failure of Honest Services by Defendants;

F. Attorney Former Judge Scruggs(Scruggs) with Attorney Gray and

“others” for fraud and delay writing the 3/25/2003 Verified Motion for Disqualification against Judge Timmerman who 9/2003 and 12/15/2003 reported intentional violations of law by Scruggs/Gray but then in conspiracy and collusion knowing Scruggs was fired 9/30/2003, did illegally conspire and make several unlawful Divorce and Child Interference with Custody Orders (October-December/2003) and still illegally used by Defendants and “others” in 2012 to continue the Lane/Popper ET AL criminal enterprise as fraud, and detainment, as extortion to all Plaintiffs for whom Townsend speaks;

- G. Judge Gomez (Gomez) saying March 29, 2004, “he met privately with Scruggs (“fired” 09/30/2003, plotting Ex-Parte without Townsend or Gray) that morning” of the hearing with Townsend, Gray and Turmel and also 8/16/2004 and or about 6/26/2007, Gomez admits acts/omissions of the criminal enterprise by Gray ET AL and “others”, who continued and refused “Honest Services” and so to continue the criminal enterprise and fraud recused himself, took the 5th and refused to follow F.S.38;
- H. Judge Monica Sierra (Sierra) assigned Divorce case 02-4974, after the 2004 recusal of Gomez as other times, did resign as a judge and did admit delays, frauds as Florida Bar Black Letter Rule and being in collusion with Karen Harrod Townsend ET AL and Steve Harrod ET AL newly retained biased Attorney Stanford Solomon ET AL, who’s co-worker attorney Rebecca O’Dell Townsend (no relation to Randall Townsend as the FDLE Michael O’Connell alleged Charlie Crist stated Townsend alleged claims

against Crist were only for political shame purposes but ignoring their now proved illegal acts/omissions) has a non-disclosure agreement with Crist based on a child paternity issue and as these defendants and “others” acting intentionally to continue the “unlawful interference with child custody per the Timmerman Order” and a willful Karen Harrod Townsend ET AL co-participants “frauds, collusion and arbitrariness” larceny and malicious prosecution, detainment, extortion and abuse now still ongoing;

- I. Hillsborough Board Of County Commissioners (HBOCC) and “Others” knowingly per the biased and now proved fraudulent legal advice of County Attorney /Administrator Pat Bean with County Attorney Renee Lee to conceal their conspiracy with the “Beck/Jeffers/Grant Sect and Others” stating in **BOARD OF COUNTY COMMISSIONERS v. SCRUGGS** 545 So2d 910, 1989, their beliefs and legal Fiduciary and Professional Duties yet in this case they conspire to conceal their criminal acts/omissions and reverse their stated “Honest Service” actions instead to unite with all defendants and “others doe” to assist and continue as directed, the criminal enterprise;
- J. Judge Holder (Holder) acts in collusion and fraud per the McKay Plot Even during these same relative times: (1) did not in 2006 recuse himself as he was appearing before the defendant FSCt for his alleged illegal conduct as an Officer of the Court and (2) received illegal Quid Pro Quo benefit by the ruling of the FSCt for participating and ignoring when the Judge Arnold 1/2003, admissions of claims and directive (hiring Scruggs

and Gray) to re-file these Townsend cases and then motion to consolidate the cases after being informed ex parte of the Scruggs/Gray ET AL criminal enterprise and (3) assisted all defendants false evidence even produced by defendant Karen Harrod Townsend 12/2005 Affidavit admitting their collusion of criminal acts/omissions, with Defendants, even in Default and knowing of their “batteries”, “attempted murder” and intentional acts/omissions to “interfere with child custody” blocked legal depositions even at Christmas and illegal use of Christmas and child support money by Harrods ET AL and “exposure of all defendants and others false evidence” Defendants still falsely produce;

(4) did block Townsend seeing and deposing his own Children and other FBCCP Plaintiffs as (5) defendants with Holder did ignore the Law, continued the criminal enterprise and for fraud and collusion stated to consolidate the cases with judge Crenshaw knowing she planned at the directive of her co-participants to continue the criminal enterprise and not expose her co-participants frauds and criminal acts;

K. Judge Crenshaw (Crenshaw) saying “prove odious and outrageous” and then confirmed her belief of Beck ET AL co-participants and “others” illegal acts/omissions by her with “Sect” Attorney Denny on 5/10/2006, for 3 hours co-writing Townsend’s Malicious Prosecution Case and saying in the open hearing “lets see what he files” after her 5/2006, Order of partial production of FBCCP files which prove Townsend is still a FBCCP Officer/Member and All Defendants lack of honest services, larceny,

collusion, intentional malice for the six proofs of malicious prosecution, frauds and proofs for punitive damages and removal of their entitlements or pensions for their acts/omissions of fraudulent services as by defendants **and “others Doe” but she and her co-participants blocks** “connecting co-participants per the *Pellegrini v. Winter* Rule” Judge Canady and Judge Orfinger and others now connect and admits act in the McKay Plot;

- L. Judge Cook continuing the criminal enterprise by “fraud, collusion and arbitrariness” showing Cooks and “others” conspiracy with now Pro Se Gray, ET AL beginning with the Cook ORDER of 8/31/2009, denying Townsend’s Verified Motion for Prejudiced Cooks Recusal as she and the 2nd, 5th DCA and F.S.CT. knowingly, willfully allowed and assisted Pro Se Gray as their charged and disbarred lawyer participant to violate Court Rules and continue the illegal acts/omissions of their co-participants now again estopped and in Default if a Legal Court or Honorable Law Enforcer existed in our Florida System and prosecuted defendants by the law;
- M. Judge Orfinger and 5th DCA judge in *Townsend v. Lane ET AL* 94-632 since 2006, plot and conspire to do as Judge Orfinger ET AL per *Robinson v. Weiland, ET AL*, 5D05-2380, 9/01/2006, quoting *Townsend v. Lane*, 94-632 **admits** as Townsend views as a criminal indictment on all McKay participants through 2011 as was/is just like the pattern of fraud concealed by judge Powell by “judicial error” and “ineffective counsel” stated in *United States v. Throckmorton* 98 U.S.61, 25 L.Ed.93 (1878):

“Where the unsuccessful party has been prevented from exhibiting fully his case...or where the attorney regularly employed corruptly sells out his client’s interest to the other side...”

proving the continuing Popper/Chapins/Chiles/McKay ET AL plot of “fraud and collusion and arbitrariness” Townsend alleges these defendants and “others” still conspire for their plot as Townsend still reveals their criminal enterprise to obtain “due process” and all “relief” admitting frauds of Judge Powell/Chapin ET AL as done in the Townsend ET AL related cases and in 2011, in collusion reversing themselves in the same frauds Gray ET AL with these judges had illegally concealed to continue the “McKay Plot” their boss F.S.CT. Chief Judge Canady indicts and proves “Singularity” by his 2011 Orders;

N. The Florida Supreme Court and its Agents: the Florida Bar; the Florida Bar Officers; Board of Governors; 2nd and 5th DCA Judges admitting “ineffective services” acts/omissions confirmed by the 11th Circuit Court of Appeals of Attorney Heather Gray as Townsend had reported since 2004, about her and “others” as Popper ET AL Defendants herein and “others” were and are worthy of Charges and Disciplinary Actions from an “Honest Florida Bar, JQC, Governor, Attorney General” including her admissions since December 2009 and before as per:

(1) Point “8. In light of these proceedings and her mental health issues, Respondent has ceased the active practice of law. In July 2009, Respondent voluntarily elected to be placed on inactive membership status with The Florida Bar.”;

(2) Her consent judgement of 12/2009 and (3) disbarment which incriminates all defendants and “others” as Judge Martha Cook, each

defendant and “others” have knowingly ignored the ongoing criminal enterprise illegal practices by Gray and her co-participants which she agreed to discontinue as an officer of the Florida Bar and alias “honorable” government courts;

- O. HCSO reported the Sarasota Police Chief Abbott and his officers same acts as Jeffers, Howlett, Smoak, Corbin, Sahr, all HCSO, all Pasco and all Pinellas and Santa Rosa County Sheriff’s, FDLE Officers, Florida Attorney’s General’s Officers and State Attorney’s Officers as listed herein as defendants in acting/omitting in their official and individual persons capacity as “honorable citizens” and “others” as violations of law and Fiduciary Duty and Trust just as HCSO and their co-agents have in conspiracy done since 1994 and before for concealing abduction of kids, property and Rights;
- P. These same F.S.20.201, FDLE officers and Co-Participant with Bush/Crist ET AL as Commissioner Gerald Bailey directed arresting the Windermere Police Chief for not investigating an allegation of criminal acts/omissions done by his personal friend but in this case the same facts/omissions are proved since: (1) in 1987 Williams as an Officer of the Court Attorney in violation of Florida Bar Rules began collusion to promote false evidence with Lane and (2) then in 1988 with Popper and (3) in 1989 Chapin to conceal Themselves; (4) in 1998 or before of Bush and Crist ET AL to conceal Popper ET AL; (5) In 1999 or before to conceal the FBCCP Sect and Sect Agents; (6) In 2005 or before and since by Crist ET AL Agent

Lori Sellers Rowe serving Crist ET AL in the Office of Attorney General as Director of Multi-State Litigation, Assistant Deputy Attorney General and Executive Deputy Attorney General from 2003-2006, and then joining Crist as Governor as Deputy Chief of Staff to conceal the criminal acts/omissions Townsend reports against his now former employer Kmart/Sears Holding Inc and employees as listed including Pharmacist Dr. Linda Rowe Campbell with others willfully violating Laws and Kmart/Sears policies Townsend as Store Manager of #3092, tried to provide “Honest Services” by exposing violations of Policies and Laws of theft, Food and Drug Administration and a Sexual Harassment Case involving their store associates/friends.

(7) Since about 2001, now Attorney General Pam Bondi still is knowingly and willfully concealing acts/omissions of herself and her Co-Participants;

Q. George W. Bush as President did knowingly and intentionally to conceal the corruption of his brother Jeb Bush unlawfully failing to provide honest services he if elected as Governor promised to do in the Television Studios of WTVT, Tampa Florida, and follow-up meetings in 1999 and since, for his self dealing political gain to keep Linda Chapin off of the Democratic Ticket with Buddy McKay for Florida Governor, and in collusion with Vetting Bush Protégé Charles Crist as Florida Attorney General for other political offices did instruct, conceal and impede the Law Enforcers Townsend informed at the Department of Justice, Federal Bureau of Investigation, U.S. Attorney’s, Judges and “Others”;

R. Tampa District Federal Judge Steven D. Merryday and Magistrate Thomas

G. Wilson per their written ruling(s)s knew and listed illegal acts and the related co-participants of these herein knew discovery connected, writing:

ORDER On November 3, 2006, the pro se plaintiff sued more than one hundred unrelated defendants, including pastors, sheriffs, police chiefs, circuit court judges, school officials, attorneys and Florida Bar Administrators. The two hundred page complaint (Doc.1) rails against these individuals for allegedly violating the plaintiff's civil rights, causing him to lose his job, and preventing him from seeing his children...A February 15, 2007 order (Doc. 5) denies the motion to stay and toll the statute of limitations and denies the motion to consolidate the cases.”

and continued the criminal enterprise of the “McKay Plot” joined by Bush/Crist ET AL per the filed October 6, 2008, Non Argument Calendar ruling in D.C. Docket No 06-2050-CV-T-30-TGW of the 11th Circuit Court of Appeals judges TJOFLAT, DUBINA and BLACK and the Court En Banc admitting the lawful rights elements Townsend, Pro Se, pled (after being lawfully told 3/15/2007, by Federal Judge James Moody Jr., Townsend willfully asked and was granted time to re-plead more details on each Defendant, which upon doing Judge Moody honorably recused himself due to his conflict of interest and disappointments of learning of the “Plot” and acts of Judge Holder his golfing buddy) for an Injunction and Discovery and proof of judicial bias and prejudice per **Zocaras v. Castro** 465 F.3d 479,483 (11th Cir. 2006), cert. denied, 127 S.Ct. 1300 (2007) as a case of “Ineffective Counsel” admitting:

“He (Townsend) argues the district court was biased because it had become a willful conduit of the “Government Corporate Veil.” He alleges the district court joined the “schism” violating his rights.” Recusal is required in certain circumstances, including

when the judge “has a personal bias or prejudice concerning a party.” 28 U.S.C. §455(b). “The bias or prejudice must be personal and extrajudicial; it must derive from something other than that which the judge learned by participating in the case.” *U.S. v. Amedeo*, 487 F.3d 823, 828 (11th Cir.) *cert. denied* 128 S. Ct. 671 (2007) quotation omitted’. In addition, any judge “of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.” 28 U.S.C. §455(a). The standard for recusal under §455(a) is “whether an objective, disinterested, lay observer fully informed of the facts of the underlying the grounds on which recusal was sought would entertain a significant doubt about the judge’s impartiality.” *U.S. v. Patti*, 337 F.3d 1317, 1321 (11th Cir. 2003) (quotation omitted).”

And Plaintiffs now state by what Judge Merryday ET AL privately knew of and by his proceedings knew as the *Aisenberg Baby Case JUDGE* and this identical “plot” therein by these same HCSO co-participants in the “McKay Plot” not then exposed but now having been admitted and exposed in their similar patterns, “lay person Plaintiffs” and “others” believe and allege, Judge Merryday by rulings reversing himself, was/is then and now biased, prejudice and in collusion with these of a “Government Corporate Veil” as HCSO Gary Terry admitted to the McKay/Bush/Crist/Bean/Bondi Plot by/with HCSO Gary Terry, 6/26/2007, and “others” as the Superior Officers of the HCSO Fraud and Internal Affairs Departments Detectives in Aisenberg (11/99) and in this (1999) case, as Respondent Superior, and Friend of the “Government Agents” Jeffers, Howlett, Smoak and as Senator John Grant, Jr. who on 11/2/07, via another E-Mail to Sheriff David Gee and State Attorney Mark Ober as judge Crenshaw named herein and continues their acts through 2012, who also have a duty to provide “Honest Services” and grant the

Injunctions his “not yet revealed to the citizens public knowledge” he withheld in his “Aisenberg Plot” Ruling to conceal the now proved “aided and abetted” his herein “Government Co-Participants” as demanded to stop the “McKay ET AL Plot” Merryday and “others” understood then and or recuse himself from this case and the McKay/Bush(s)/Crist Plot, F.S.Ct. Judge Canady now admits his co-participants knew, did and does still, until full discovery is revealed and a “Public Jury” of “Citizens” as Peers has Ruled not barred by prejudiced judges.

- S. Florida Supreme Court Chief Judge Canady (Canady) being informed of his and his co-participants previous McKay Plot now likewise disqualified the entire 2 DCA for fraud of which he was a member at relevant times, who since 2/2004 in the *Townsend ET AL v. Beck ET AL* 02-03812 1st appeal dismissed the appeal as “premature” to Intentionally delay exposure of the “McKay/Crist Plot” vetting Bush protégé Gov. Crist to the office of Republican Ticket Vice- President knowingly concealed and aided in the McKay Plot with the co-participants in the ongoing now and proved then as violation of law, “Honest Services” and “Due Process”;
- T. Judge Canady in May 2011, by disqualifying the entire Florida Supreme Court because of his and his Florida Supreme Court Justices, Florida Bar Members and “others” “fraud, collusion and arbitrariness” in the corrupt criminal enterprise began by Popper in about 1988, as continued by the “McKay Plot” and “others” did in May 2011, admit, indict and recuse the entire Florida Judicial Branch and “others” for the illegal acts/omissions

now proved as Townsend alleged since about 1991 and at relevant times Bar Officers Chinaris and Boggs as a threat for Townsend reporting this now admitted criminal enterprise but by F.S.617, these Townsend ET AL Plaintiffs have standing;

- U. Florida Attorney General Pam Bondi, is knowingly violating F.S. 16, in 2012 still continuing her intentional and knowing participation in the criminal acts/omissions, McKay Plot since she joined in 2001, or before, in her capacity as in the Hillsborough County State Attorney's Office to in collusion with Popper/Chapin ET AL, Florida Bar ET AL, Gibbs ET AL, Grant ET AL, HCSO, FDLE, Bush ET AL, Crist ET AL, Pat Bean ET AL, Mark Ober ET AL, judges, Beck ET AL, Jeffers ET AL, Howlett ET AL, and Smoak ET AL and "Others" to "obstruct" due process and promote known fraudulent evidence in the attempt to continue the Popper ET AL McKay Plot to defame Townsend in the "public light" and not prosecute herself and her co-participants who evade the law and by RICO Acts/omissions and who still violate these Townsend ET AL Plaintiffs;
- V. Defendant Pat Bean firing and cover up of case management files and conspiracy by biased "alias" Judges, Law Officers and the BOCC Members who had benefited and thus were prejudiced from her prior legal positions to and for them who in conspiracy the Judge presiding on her suit for severance claims awarded her settlement "hush money" again at the expense of tax payers rather than let tax payers get "public records";
- W. Defendant Jim Norman was at various times as Board Member and

Chairman of Hillsborough County Commission and was duly advised of the “Odious and Outrageous” and illegal acts of his co-participants but failed to provide “Honest Services” and now has himself being the subject of investigations for ethical violations and receiving Quid Pro Quo advantages and enrichments which without this lawsuit Tax Payers will not be knowledgeable of what per the law is to be “public records”.

16. Per Florida Statutes §817.155 **Matters within jurisdiction of Department of State; false, fictitious, or fraudulent acts/omissions , statements, and representations prohibited; penalty; statute of limitations**” all defendants and “others doe” have knowingly and willfully participate or abated and abetted in criminal acts/omissions of their co-participants in frauds and other criminal acts/omissions to continue their criminal enterprise of: fraudulent services; larceny by frauds; abduction of children, rights and property; and are therefore in violation of their Duty per our Constitutions.

17. Per Florida Statutes §16.56 **Office of Statewide Prosecution**—Attorneys Generals have and are knowingly participating in and aided and abetting the Criminal Enterprise as alleged herein where by duty they are to protect citizens, these Plaintiffs.

18. Per Florida Statutes §14 **Executive Branch-Governors**—Since about 1991 being informed for their “admitted” “self dealing” by Bruce Chapin and “others” have and are knowingly participating in and aided and abetting the Chiles/McKay Democratic Criminal Enterprise and the Bush/Crist Republican Criminal Enterprise as the McKay Plot Criminal Enterprise as defined by the McKay Commission as alleged herein where by duty they are to protect citizens and as these Plaintiffs for whom Townsend speaks.

19. Judge M. Crenshaw being the agent appointed by Governor Bush and Governor Crist

proved willfully evading omissions of truthful disclosure from and since 2003 as fraud and a “bribe” to get Townsend to abandon his co-plaintiffs and even his own children’s rights in court said 9/7/2006, she “was trying to get him (Townsend) a lot of money” and “all things are related” and “you can could go after the others later” in her orders per the **Townsend ET AL v. Beck ET AL.** case 02-03812, “Odious and Outrageous” Malicious Prosecution Summary Judgement hearing only naming Ron Beck and not his co-participants: as production confirmed the self-dealing unlawful motives of Marva Crenshaw, Charles Denny IV and A. James Rolfes and Charles Scruggs III, for and with their Co-Defendants and “others Doe” now after the admissions by F.S.CT. Chief Judge Canady are able to be named and proved as willful Defendant Agents in the criminal enterprise still doing violations of F.S.§617.0285 by intentional acts/omissions of “Honest Services Frauds”; “Breach of Contracts and Fiduciary Duties”; “frauds, collusion and arbitrariness”; and deprivations by Defamation; Torts; Abuse; Grand Larceny; Intentional Interference with Civil Rights and Assembly, Speech and votes of individuals and “THE BODY” by Defendants and “Others Doe” as they fraud to present themselves in a “False Public Light” Under Color of Law using the collusion of Deputies/non members Jeffers, Howlett and Smoak , alleged “clergy” and “others” to Unlawfully Detain Townsend from His Church since 09/08/1999, the HCSO Offices and Courts to block a “jury trial” (Body and Citizens) to detain “Due and Equal Process” of Laws and By-Laws to conceal their criminal conspiracy as they conspire to immune themselves from their ongoing criminal acts/omissions even through now doing larceny, “extortion”, threatening all citizens by even as an example of their powers detaining and threatening the Townsend children and Townsend ET AL in 2011, since 10/20/99 from

his co-member children and “The Body” from 9/8/99.

20. Townsend still refuses since about 1987 to assist any Criminal actions of: Lane d/b/a Sabal; Lane/Williams ET AL; Popper ET AL; Jeffers/Beck/Gibbs/Grant ET AL and Chapin ET AL enlisting the criminal assistance of: his wife Linda Chapin and the Orange County Commissioners; Judge Rom Powell and his Orange County Circuit and 5th DCA; Judges; his Florida Bar Members and Government Officers including the F.S.Ct. and “others” since about 1991, intentionally directing non-disclosure and more criminal actions through 2011 to extort Townsend again to participate in accepting an illegal “bribe”, “extortion” Pay-off for himself which evades “Due Process”, “Free Will” rights, restitution and the “True Public Light” those for whom he speaks as Co-Plaintiffs are entitled to declare their rights and relief by the “Jury” Process as the “Body” or as “Citizens” per Florida Const. Article I. Sec. 3. in a Civil, Grand or Criminal Jury.

21. Townsend also refused to participate in the collusion and fraud of Crenshaw ET AL, Denny, judges, Canady 2nd DC A and known Defendants at that time as it is proved the actions since 9/7/2006, were “intentionally made false statements and promises “ as “fraud, collusion and arbitrariness” by Defendants and “others doe” to not expose the “alias Government” Crenshaw/Denny ET AL. as “McKay Plot members” and their co-participants as the facts/omissions of this case since 1987 through the filing of this 2012 Federal Complaint connects the co-participants and “others doe” in their ongoing self dealing criminal enterprise to deceive and deprive “tax paying” and “Not for Profit” Florida citizens of “Honest Services” as these for Political gain beguile and extort voters.

22. Townsend for all citizens alleges and believes the State of Florida Agents as named herein and “others” to be named after full discovery is allowed, criminally acts to deprive

and gain an unjust enrichment for themselves from Domestic Relations and Divorce and “other” cases as these Government Agents ignore the spirit of our law to protect citizens and families and children’s Rights that Government as shown separates to gain an unfair control and detention of citizens rights and property.

23. This is an action for relief of damages in excess of the jurisdictional requirements of this court and to obtain relief of violations of Constitutional Rights for Townsend and for all Plaintiffs incorporates the above herein and further states:

FACTS AND ALLEGATIONS

24. Townsend acts for and as:

- A. an Individual; and
- B. in this Derivative Tort Action: for himself, his family and his business (Future Marketing); since about November 1987, seeking specific legal protection against frauds, defamation, Breach of Contract, Unjust Enrichment and torts by a “Joint Venture” Business partner Lane (Sabal Marketing) and then in 1988 through now from connected various intentional and reckless torts by Townsend’s attorney David H. Popper (Popper) with Lane and “others” who knowingly began premeditated Mens Rea torts with these masquerading “under color of law” “lawyers, courts and government officers” (alias law enforcers) and “others” per State and Federal Laws who plot and unite to (1) omit truthful disclosure and (2) conceal the Popper criminal enterprise plot to defame Townsend to conceal Poppers negligent legal advice and service to Townsend to: “Don’t violate anything Lane says” to “stop all work and don’t talk to clients cause that will be witness tampering, until I get the contracts from Lane” [still not done in 2012]

and then Popper ET AL intentionally did not defend client Townsend/Future Marketing from the Lane ET. AL. 8/5/1988, “Sham Extortion Counter-suit” of the Criminal Enterprise by “law enforcers” with “Florida Bar Members” superior knowledge, control and “McKay Plot” conspiracy on Townsend reaching now to and deprivating these Townsend ET AL Plaintiffs;

C. Townsend per his elected FBCCP duties and as a victim Respondent(s) and per:

“F.S.870.04 **Specified officers to disperse riotous assembly.---** ...or any peace officer, shall in the name of the state command all the persons so assembled immediately and peaceably to disperse; and if such persons do not thereupon immediately and peaceably disperse, said officers shall command the assistance of all such persons in seizing, arresting and securing such persons in custody; and if any person present being so commanded to aid and assist in seizing and securing such rioter or persons so unlawfully assembled, or in suppressing such riot or unlawful assembly, refuses or neglects to obey such command, or, when required by such officers to depart from the place, refuses and neglects to do so, he shall be deemed one of the rioters or persons unlawfully assembled, and may be prosecuted and punished accordingly.”

Acts and derivatively speaks also for all Plaintiffs herein as unanimously elected in 1993, and subsequent years and without fraud, reveals “Breaching the Peace” by “Jeffers Sect and Sect Agents” per our Church Contract of Duty and Rights, (By-Laws “ARTICLE III. SECTION 18.(b). The Nominating Committee shall review each position annually and make necessary recommendations to the Church for approval.” who are being damaged as part of the “McKay Plot” conspired enterprise to defame Townsend as “make Townsend the liar” about: (1) Townsend’s Future/Sabal Contract and Townsend’s Business Rights; (2) The Criminal Collusion by Lane/Popper/Chapin/Gibbs/McKay ET AL; (3) FBCCP “Sect and their Agents Self-Dealing, Larceny and By-Laws and FBCCP violations” (4) “Sect and their Agents Building Scheme Frauds; and (5)

Defendants and “Others” continuing criminal acts and thereby per:

MEIER v. JOHNSTON 110 Fla.374 “...For it is conceivable that in a proper case even a single party as Representative of the whole membership may sue or defend for the whole.”

as F.S. §617.022(2)(a) Derivative Actor Townsend against various “Sect persons” as “Non-member Law Enforcers”, fraudulent “clergy”, employees, others do and their “Sect Agents” who intentionally do torts and violate the By-Laws and Laws and Citizens per **FIRST FREE WILL BAP. CH. OF BLOUNTSTOWN, INC. v.**

FRANKLIN, ET AL., 4 So2d 390, 148 Fla. 277, stating:

“When membership was accepted therein, they submitted themselves to the ecclesiastical jurisdiction of the church...The law appears to be settled that in the absence of showing of fraud, collusion or arbitrariness on the part of the church authorities having jurisdiction of the controversy, the courts will not interfere.”.

D. As a citizen victimized for being: a parent; having Religious Beliefs contrary to Defendants; and deprived because of race.

25. In each complaint and other notifications, victim Townsend, Pro Se, for himself and “others” has stated, filed and met the elements of Attorney Client Rule 105 as: “Three elements of action for legal malpractice are the attorney’s employment, his neglect of a reasonable duty, and the proximate cause of loss to the client.” and revealed how each defendant and their co-participant has willfully violated their Contracts with all Townsend Plaintiffs and the Fiduciary Duty of said contracts per Florida Constitution Article II. Section 5(b). “Oath to their Office” in doing their illegal acts/omissions as Judge Crenshaw and Attorney Denny admitted by co-writing the Malicious Prosecution Count on May 10, 2006 and ruling “you can go after the others later” so to conceal and continue the frauds as their co-participants as Judge Canady admits they now still do.

26. Each Defendant finally in or by 2012 by their acts/omissions and co-participants

acts/omissions have revealed their Mens Rea guilty mind for their illegal performance of their criminal enterprise acts/omissions as per F.S. §817.11 “**Obtaining property by fraudulent promise to furnish inside information**” per the recent 2011 admissions as Indictments of the 5th DCA Judge Orfinger and Florida Supreme Court Chief Judge Canady just as Townsend in his Appellants Reply Brief for *Townsend v. Lane* case 94-1913 5th DCA of the R.O.C.P 1.540 lower case 94-632 stated to Judge Powell and on February 4, 1995, wrote:

“Per *ZAFIRIS v. MOSS* 506 So2d (Fla DCA 3d, 1987) and *LIKOVER v. SUNFLOWER TERRACE II* 696 S.W. 2d 468 (Tex App 1 DIST 1985) and *STATE OF FLORIDA v. BURTON* 314 So2d 136 Florida Supreme Court, Williams and Chapins acts may be regarded beyond aggressive but illegal.

Williams states in his answer brief that “In a second, independent action, Townsend alleged that his own attorney, as well as Lane and Lane’s attorney (Williams), committed fraud which induced Townsend...” and “which is the subject of this appeal”...

Judge Powell has also blocked Appellants attempt to state a cause of action against Williams as filed in case, CI-94-3042 still pending.

Judge Powell refused to allow Appellant to question Chapin and thus produce evidence of the verbal frauds and written frauds between his attorneys and this Appellant....”.

as these same illegal acts/omissions and violations of Due Process were argued and presented in Townsend’s Federal Complaint 8:06-CV2050-30-TGW as *Townsend ET AL v. Beck ET AL* which the 11th District Court of Appeals has ruled “ineffective counsel” by these “alias Law enforcers” and now as admitted by F.S.Ct. Canady.

27. This Pattern of Intentional Collusion by alias “Law Enforcers and “Bar Members” with the: 13th Circuit Court Judges as Judge Palomino/Scruggs; Judge Crenshaw/Denny; Judge Timmerman/Scruggs; Judge Gomez/Scruggs and Gray; Judge Stoddard/Scruggs; Judge Barbas/Denny; Judge Holder and Arnold/Karen Harrod Townsend ET AL; Judge Cook/Disbarred Gray; and with the 9th Circuit Court Judge Powell/Stroker/Chapin,

Popper, Williams and “others” via Chapin/Harkness/Berry/Chiles/Crist ET AL/ and Pat Bean ET AL, Assistant State Attorney now Attorney General Pam Bondi ET AL with HCSO, State Attorney Ober, Judge Merryday, Bush(s), and “others” connects in the same pattern of the 2DCA five or more times and the 5th DCA six or more times based on the same facts/omissions but in illegal collusion and corruption against Townsend and those for whom he speaks.

28. Defendants breach their professional standards, fiduciary duty and contract duties by fraud accepting duty to perform then “omit truthful disclosure” in their rulings, then the 5th DCA admitted doing a deceptive, fraudulent and unlawful P.C.A. and the Florida Supreme Court recusing themselves and of again using a P.C.A. is repeated in 2011, wherein Judge Orfinger to “omit truthful disclosure”, “odiously and outrageously” reverses himself with another P.C.A. that then the acts/omissions of Judge Canady by recusing the entire Florida Supreme Court shows their negligent tort scheme and admission of a past “judicial error” as admitted by Judges Crenshaw (“you can go after the others later”), Orfinger (Judge Powell was a joint conspirator) and Canady (Inditing “All”) of the criminal enterprise as in this *Townsend ET AL v. Gray ET AL* 06-6005 case appeal it was known, included and proved by the Florida Supreme Court in the disbarment of Gray in SC09-112, as they willfully participated with the Florida Bar Officers (Harkness and Berry) and Members (Popper, Chapin and Gibbs since 1991 and before) and “others” as Bushs/Crist ET AL in Gray’s fraudulent scheme with Scruggs (from 2000) with HCSO, the Florida States Attorney’s Office as Mark Ober and Pam Bondi as Denny ET AL since 2/03 and “others” as Gray in Default, even is not authorized by the F.S.CT. in 09/2009, to file papers as an attorney for these Defendants

as judge Cook “outrageously” just as Judge Powell ignored Rule of Law of “ineffective counsel” and laws and facts/omissions in the case as has been now by specific points been admitted by “alias Law Enforcers, Bar Members and Judges” now included as Defendants as “persons” not acting lawfully as they are estopped and ignore our laws.

29. Townsend alleges and believes even in the *Townsend v. Beck* ET AL 02-03812, Malicious Prosecution Count “judge” Crenshaw wrote 5/10/2006 and every Defendant named and “Others” has met the elements of the criminal enterprise plot Judge Crenshaw defined and as written to Judge Cook and her Superiors in the *Townsend v. Gray ET AL* 06-6005 Appeal as Judge Canady by recusal of the judges confessed to their ongoing criminal plot done by “alias justices” who had not taken their oath of office and by State Agents performing illegal acts they now admit they knew is not within their Oaths to do.

30. Townsend affirms and believes thus by the F.S.CT. Canady Order every Defendant is indicted in Popper’s 1988-now criminal enterprise to ignore the law and loyalty to the contract with his client so to defame Townsend and unlawfully take and detain Plaintiffs children and property even violations of Religious Contract and Civil Rights by conspired Criminal Acts/omissions as Larceny, Abduction, Racial and Religious “Hate Crimes”.

31. Townsend alleges and believes that the F.S.CT. Chief Judge Canady recusal orders confirms the acts/omissions as an “Indictment of the McKay Criminal Enterprise” on each Defendant and including the conspiracy to “omit truthful disclosure” by Florida Bar Agents and “others” to conceal truthful evidence Townsend offered to Defendants in each Townsend Florida Bar Complaint revealing the McKay Plot and other crimes.

32. Estopped Defendants and “others” intentionally still in 2012 by Finance Committee Member/Trustees Jeffers and Howlett, Karen Harrod Townsend and her brother Steve

Harrod implant “false evidence” to “The Body”, all Plaintiffs, as jurist and “Others” and to conspire to keep Townsend from his children now since 09/08/1999, and his FBCCP Members Rights of Assembly and Records inspections as they with the co-defendants conspire with: FBCCP Non- Members Deputies Jeffers, Howlett, Smoak; Lawyers Gibbs, Grant, Ober ET AL, Popper, Chapin, Crist ET AL, Bean ET AL, Scruggs ET AL, Denny, Rolfes; Gray; FDLE; Florida Bar Officers and Members; HCSO; Florida Supreme Court Judges, Attorney General Bondi and “others” who “Under Color of Law” since or before 1994 usurp: Laws; FBCCP By-Laws; “THE BODY’S FREE WILL” voting Rights; and to conspire, fraud and detain victims since 1994, for whom elected Townsend speaks as:

33. Plaintiff, First Baptist Church of Citrus Park (FBCCP) is a F.S. §617 “Not for Profit” Corporation and with Citrus Park Christian School (CPCS) as a Ministry of FBCCP operated and did its Religious Beliefs and Ministries as such since about the 1940’s being formed as a Mission Church by Townsend’s Uncle, Reverend Floyd Tyson to operate by Owner Members, (The BODY), under a contract known as the “By-Laws” specifically stating “Rights and Duties” as filed with the Florida Secretary of State. In 1983 ‘The Body’ through FBCCP formed CPCS at its main campus 7705 Gunn Highway Tampa Florida property. FBCCP is to operate per By-Laws of 1993, filed per the law but since about 1994 Government Jeffers ET AL “Sect” have deprived and defamed the “Not For Profit” for illegal personal self-dealing, larceny and frauds and deprived the FBCCP, CPCS and Members from their inalienable religious rights and property.

34. Townsend cannot per the By-Laws and per Florida Law be unlawfully removed by an “Unlawful Sect” from his elected FBCCP member Duties as begun in 1969 as an FBCCP member and returned in 8/1993 and in 1993 per the Nomination of Senior Pastor Harold

Warner (announcing his retiring, 1/16/1994) directed “THE BODY” for Townsend as was unanimously elected as the younger “fit and proper guardian and representative” to carry out the FBCCP By-Laws and his uncles and the “BODY’S” Mission Vision. The Vision included a Christian School through the 12th Grade, a larger sanctuary, and a retirement center. This “Vision” was on January 14, 1996, as also a review of the Eminent Domain pending matter with Pat Bean (County Attorney) and Jim Norman (County Commissioner) for Hillsborough County as presented by Townsend as Chairman of the Long Range Planning Committee (LRPC) and as Nominations “Ethics Supreme Court” Member and the Awana Commander in a **NINE POINT REPORT** was affirmed by “THE BODY” and by Pastor Beck stating:

”The emphasis I would like to make would be on point number 8 on prayer. I would really appreciate you as a Body, to pray. I know what I sense God may be leading us to do as a Church Body that I feel God works with an entire Body and there needs to be a sense of unity. When God brings the Body to the same conclusion we know God is in something, and God is leading. We are praying for the Sanctuary/Educational type facility taking out the older parts of our building over to the second story building.

David Powell-Regarding to the Long Range Planning Committee; when they come up with an option with what to do, will they make the decision or will it come to the Body? Will there be several options to choose from? Or will they present one option they have picked?

Pastor Beck- We don’t know what we are doing remodeling or rebuilding at this point. So that is a difficult question to answer. Nothing will be done without the approval of the Body. We need prayer from the Body for unity as to what God wants us to do. Any more questions?”

And because of the failure of Honest Services and ongoing Conspiracy of

Defendants herein and “Others Doe” Plaintiffs are being impeded and damaged.

35. First, FBCCP By-Laws, Florida Due Process and Federal Laws which Defendants doing their acts within the jurisdiction of the Tampa Middle District Federal Court have ignored (the 1994 violations of “sect” Jeffers, Nasworthy, Beck, Powells, Meister, Smoak

Howlett, Leatherman, Bates, Smith, Karen Harrod Townsend, others and their agents as Lawyers David Gibbs III, John Grant, Jr., Dickinson & Gibbons, HCSO, Bean, "others" and their Superiors) are required to be followed in lawful order for: (1) Townsend or CPCS Pastor Dr. Berry or "others" to be removed from positions by those as elected for whom they speak for Plaintiff's "Free Will" Rights; (2) not by "sect" "frauds, collusion and arbitrariness", using torts of "non member Jeffers Government persons" or by; (3) the "Sect" or "Sect Agents" (Deputy Jeffers ET AL) impeding Townsend's Superior Duties over Jeffers sect or even as a Member; (4) Townsend as are all of "The Body/Jury" is to be allowed to: Inspect; supervise; and or approve or rebuke all Documents and Actions; and assemble and speak to or with their fellow members as a Corporation (Not for Profit); and not be "impeded" by Jeffers ET AL from: the "discovery" of internal FBCCP and CPCS and "other" documents (as alias "Operating Fees", "Discretionary Funds", "Administrative Records") as demanded by "The Body" about and since October 9, 1994, in a Business Meeting confession to By-Laws violations, torts and "Breach of the Peace" fraud by then Administrator Pastor Nasworthy for self-dealing of himself, Beck, Powells, Meister, Jeffers and "others" doing abuse of our By-Laws and Contracts with Defendants for their Honest Services without crimes, retaliations, discrimination and frauds.

36. HCSO Deputies Joe Howlett and Mike Smoak in collusion with Pinellas Deputy Tim Jeffers and Pasco Deputy Mike Corbin and "Superior Officers" via Sheriffs, Gary Terry, Mark Ober and Pam Bondi and "others" as Attorneys Gibbs, Grant, Denny, Rolfes and their McKay/Chapin/Bushs/Crist ET AL "Superior Government alias Law Enforcers" as named above herein have "Bullied", ignored, impeded and instigated intentional frauds as "Law Enforcers" "Under Color of Law" with "others" to deprive Plaintiffs since or

about 10/1994 and done these acts/omissions :

- A. Falsely Defamed Townsend to his fellow citizens that per their alleged Superior Knowledge Under Color Of Law that Townsend was not following: the Federal and State Laws; FBCCP By-Laws; the Townsend/Lane "Agreement"; Courts Rules and Florida Bar Complaint Rules and Tax Laws;
- B. Produced Deceptive Fraudulent FBCCP Business Meeting and "others" Reports;
- C. Ignored the FBCCP and Constitutional and Contract Rights of "The Body" and Plaintiffs as the Church Jury and or citizens Jury;
- D. Threatened Plaintiffs to not "oppose" these defendants and "others" illegal acts;
- E. On, before and since 09/08/1999, did unlawfully "impede" their FBCCP Superior Elected Officer Townsend and "others" in the "investigation and By-Laws process" to expose the ongoing corruption of the By-Laws Process since admitted by Administrative Pastor Nasworthy in October 1994, and even threatened and did unlawfully detain Townsend and "others" including abducting by force and frauds his children from their Civil and Religious Belief and Legal Due Process Rights even keeping Townsend off of the Church/School Property by car chases on public property and standing on the church steps in their Uniforms as "Law Enforcers" based on the now proved illegal threats and "false public light" for defamation against Townsend and the FBCCP Plaintiffs they created with "Others" to conceal their criminal enterprise and frauds;
- F. From September 8, 1999 and through and On October 31, 2001, directed willful Ron Beck and Karen Harrod Townsend of and for the "Sect and Sect Agents" to "knowingly and intentionally" for "sham" file with "McKay Agents" false and

criminal reports against Randall Townsend as Karen Harrod Townsend ET AL still on May 27, 2011, in Pensacola Florida did continue to threaten arrest by “sham charges” to keep Townsend from his children and civil rights as these defendants have unlawfully threatened and extorted the Townsend children and those for whom Townsend speaks since about 1999 and before;

G. On October 28, 2007, Tim Jeffers admitted ongoing criminal acts/omissions of producing fraudulent Business Records to the FBCCP, Law Enforcers and Courts in collusion with his co-participants and C.P.A. Janssen per the 10/1999, letter and outside his jurisdiction as a Pinellas County Deputy in Hillsborough County did assault and battery on Townsend and Jeffers/Beck/Gee ET AL in pre-meditated conspiracy told HCSO Deputy Clark to remove, trespass and threaten arrest to member Townsend from inside the Church Sanctuary during a “Worship Service and FBCCP Business meeting without cause but to continue: “shams”, “larceny”; “fraud, collusion and arbitrariness” of all defendants and “others”;

37. Defendant Pam Bondi: individual; as a resident and citizen acting in Tampa, Florida; allegedly providing “Honest Services”; Pam Bondi, as Attorney and Florida Bar Member; Pam Bondi, Assistant Hillsborough County State Attorney (2001) and Florida Attorney General 2011); At all material hereto, acting within the scope of her employment or was an agent actual or apparent, thereof has in collusion knowingly obstructed the law and due process including violations of F.S.§905.19 Grand Jury. Duty of State Attorney also violations per F.S.§27 and did her self-dealing conspired unlawful acts/omissions as a threat to impede and obstruct justice and now continues and transacts her affairs doing negligence and obstruction of her “Oath” and duties per F.S.16.

38. Defendant David Gibbs III allegedly was acting by Providing Honest Services for Townsend individual (since 1991 *in Townsend v. Lane/Popper/Chapin/Williams and "others"*) and all Plaintiffs but in his "fraud, collusion and arbitrariness" only acting as Agent for the Sect; Sect Agents and Other Defendants directly with the Bushs and Crist and Jeffers ET AL acting and omitting truthful disclosure as he argued in the Terry Schiavo Case knowingly and intentionally violates and breaches his Attorney/Client Fiduciary Duty, Oaths and Contract Duties to: The FBCCP/CPCS; non-sect members as Officer/Guardian Townsend; Townsend individual; the Townsend Children (J.D.T. and J.G.T.) and other non sect members even by intentionally, recklessly and fraudulently acting in omission of truthful disclosure; "fraud, and arbitrariness" against Townsend legal "Officer" operations under the FBCCP By-Laws; CPCS Policy Handbook; State and Federal Laws; Florida Bar Rules; and Florida Rules of Courts regarding grievances with sect members and other Defendants and "others Doe" and concealing the fraudulent practices of Popper/Chapin/Governors/Bar/JQC ET AL since intentionally omitting truthful legal advice since 1991 and concealing "Sect and Sect Agents" illegal acts/omissions from 1994 by himself and co- agents; and still does his conspired unlawful acts/omissions as a threat to impede and obstruct justice to gain unjust enrichment..

39. Defendant FBCCP Lawyers David Gibbs III ET. AL. and Registered Agent John Grant Jr. ET AL. and "others" are lawfully advised from 1994 of the "Sect" violators and in malicious collusion with malice have provided "ineffective counsel" to obstruct and deprive Plaintiffs especially "The Body" to defame Officer Member Townsend as they knowingly act to only advance the frauds of Jeffers Government Sect Agents ET AL via Beck/Harrod ET AL as proved by produced FBCCP documents Jeffers ET AL with

the “fraudulent acts” of “Sect Agents as Denny/Rolfes ET AL , Scruggs/Gray/Grant ET AL” had concealed, finally partially revealed per a 5/10/06, Order of Judge Crenshaw.

40. Second, Gibbs still provides alleged professional services and advises The FBCCP, “The Body” and Citizens via his Christian Law Association (CLA) and private practice.

41. Townsend alleges and at previous times believed Gibbs specifically and privately was providing honest legal services advising Townsend since 1991-2000 as per their FBCCP Duties up to and including Townsend stating the “Demand Meeting” Rights of Plaintiffs on 09/08/1999 and also in Townsend’s Future Marketing Business Matters as Gibbs and “Others” knew the Rule of Law also requires the 6/27/1989, Order of Judge Muszynski in **Townsend v. Lane d/b/a Sabal Marketing** Case No. 88-2554-CA-03-P, at some point to be followed Ordering for Discovery of all Lane and other records to be produced for inspection by Townsend within 10 days per the argument of Popper of 3/16/1989, stating:

“4) Rule 1.280(b)(1), Fla. R. Civ. P. states in part the following: ...(P)arties may obtain discovery regarding any matter, not privileged, that is relevant to the subject matter of the pending action, whether it relates to the claim or defense of any other party, ...It is not ground for objection that the information sought will be inadmissible at the trial if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.”

42. Defendant David H. Popper, ET AL. Since about January/February 1988, Popper represented himself as an honest skilled attorney and was retained for his allegedly providing Honest Services to Townsend ET AL by Attorney McCarthy and “Others” to get Lane 1987-1992 records and protect all Townsend ET AL’s Rights.

43. Popper ET AL intentionally delayed and prevented obtaining Lane/Sabal Joint Venture Business Records via any Legal Process of Court Orders or Subpoena’s until via an “Order for Production” Popper finally and originally demanded to the court 1/12/1989,

but did not per his “ineffective counsel delay plot”, obtain records and intentionally, per his letter of 8/10/1989, wrote:

“Dear Charlie: In reviewing this file, I noticed the Judge’s Order dated June 27, 1989 granted our Motions to Compel Production of Documents....In the mean time, I would suggest that we cease to litigate this matter until Randy has had a chance to review those records...”

and abandoned obtaining said records when Popper learned the production and lack of Contracts Lane had prior to August 7, 1987, would prove the malfeasance of Popper and greater damages to Townsend for “stop contacting your clients” and thereby the Judge Orfinger Ruling in 2006, in **Robinson id.** exonerates and vindicates Townsend of the defamation and frauds and deprivations done by all Popper participants ignoring Judge Muszynski’s 6/29/89, Order which is the Rule of Discovery Law all should have done.

44. Popper on April 3, 1989, left the employ of the law firm of Austin, Lawrence and Landis and joined the law firm d/b/a a partnership of O’Neil, Chapin, Marks & Liebman, all Florida Professional Associations (Chapin ET AL) and about 10/1989 became a partner and thereby continued his “fraud, collusion and arbitrariness” with Bruce Chapin ET AL directly to “McKay Plot” Participants, Florida Bar Officers Harkness, Berry, Governors, and F.S.CT. and “others” now by F.S.CT. Chief Judge Canady in 2011 has admitted are still doing their criminal acts/omissions and enterprise.

45. Defendant Charles E. Lane Jr, Individual, d/b/a Sabal Marketing, Inc. does his acts from or about Seminole County Florida and created a contract he signed with Townsend d/b/a Future Marketing on 8/7/1987, in Polk County Florida, but now it is known by later production of documents fraudulently delayed by collusion of Lane, Williams, Popper, Chapin’s, Judge Powell and “Others” until in or about 1992, Lane was required to form a Joint Venture Agreement Contract by fraud, because Lane by unethical business actions

had been banned from customers and clients and did not have legal ownership to rights of the contracts he claimed on 8/7/1987 Lane claimed to own. Lane/Lane ET AL cannot evade consequences or restitution to Plaintiffs for his illegal acts by frauds and bribery with defendants herein as Plaintiffs now former attorneys and alias law enforcers and “others” at relevant times admit criminal acts/omissions to conceal their ongoing criminal acts/omissions against Plaintiffs.

46. Defendant Charles E. Williams Jr. and as P.A. acting within the scope of his agency (Williams) acted at relevant times from about 1987 as the Attorney of Lane, Individual, as a friend of Lane since their Junior High School days and knowingly and intentionally for fraudulent purposes to conceal a criminal act(s) assisting Lane to violate Sabal Marketing Inc. and the Townsend/Future Marketing “Joint Venture” Agreement of August 7, 1987 and Townsend ET AL since about or before 8/1987 to 12/1987 and since.

47. At all times material hereto, the Defendant Bruce E. Chapin, Individual, Esquire and as P.A. And David H. Popper, Individual, Esquire and P.A. was employed and in a partnership with Defendants, BERNARD C. O’NEIL, JR., P.A., ROBERT O. MARKS, P.A., JOHN B. LIEBMAN, P.A., DAVID H. POPPER, P.A., AND MARK O. COOPER, P.A. all Florida Professional Associations, doing business as a partnership known as O’Neil, Chapin, Marks, Liebman, Popper & Cooper.

48. Defendant Linda Chapin as “Commissioner” and by Buddy McKay appointed as “Orange County Clerk of Courts” failed to provide “Honest Services” but provided unjust enrichment and conspiracy and fraudulent Quid Pro Quo practices for herself and her co-participants in the same pattern as discovered by Plaintiffs as done by co-participant, Pat Bean willing and able to continue the “Chapin/McKay Plot” in Hillsborough County.

Bean as the Hillsborough County Attorney and Hillsborough County Administrator was directly and indirectly responsible for the deprivations and delays done to the “Mission Quest of FBCCP” growth plan and she knew Townsend understood and was revealing her deprivations and negligence to the FBCCP members and Tax Payers. At the FBCCP/Hillsborough Eminent Domain Case Mediation Conference, Bean exposed case law from Judge Rom Powell which Townsend immediately questioned and as it was specifically used to misrepresent the legal standing of FBCCP and falsely persuade the FBCCP non-sect members Townsend spoke for from going to trial. Through collusion and frauds the Sect and Sect Agents violated and still violate the “Free Will” of Plaintiffs.

49. Defendant Scruggs since about June 2000, represented himself as an honest skilled attorney and Former judge and was retained for his allegedly providing Honest Services to Townsend ET AL to get Townsend and his children reconnected and obtain FBCCP records and protect all Townsend ET AL’s Rights until he was fired 9/30/2003, when he argued that the finding of Judge Crenshaw allowing Malicious Prosecution Claim against Ron Beck was a misunderstanding on her part and that the threats and information from Timmerman on Scruggs malfeasance was also a misrepresentation under the law.

50. Townsend choosing to believe the not yet exposed frauds of Judge Crenshaw, Judge Timmerman and Attorney Gray sought to inform the courts with what Townsend believed was “Honest Legal Services” from the courts and Attorney Gray but as revealed at later point in time these co-participants were creating deceptions and extrinsic frauds and obstructing justice in the collusion of the McKay Plot.

51. Since or before January 2003, Denny ET AL represented himself as an honest

skilled attorney and was retained for his allegedly providing Honest Services to/for “all members of FBCCP” thus including Townsend ET AL to get Townsend and his children and “Non-Sect members and others” truthful FBCCP records and protect all Townsend ET AL’s Rights. Denny ET AL even upon knowing the collusion and findings of judge Crenshaw ET AL from 2003-2006 and the McKay Plot and his intentional conspiracy against his FBCCP Clients did not provide Honest Services as per his stated acts in his letter to judge Barbas of 9/11/2007 stating he did not agree that the 02-03812 case was lawfully dismissed as the letter reveals Barbas ET AL acting in the McKay Plot. Such revelations by Denny exposed his conflict of interest in representing Beck and the Sect verses other members including Townsend and the FBCCP as a Corporation to the court of Judge Barbas but the McKay Plot required total termination of discovery and the case.

52. Defendant Anthony James Rolfes, Individual, and Florida Bar Member since 1983; as Attorney At Law, (Rolfes) operates at relevant times operates as the employee, agent, actual or apparent of A. James Rolfes P.A. acting within the scope of his practice and transacting his business out of Sarasota, Florida, Sarasota County as employee and agent of Dickinson & Gibbons. Since about or before January 2003, Rolfes represented himself as an honest skilled attorney and was retained for his allegedly providing Honest Services to Townsend ET AL to get Townsend and his children and “Non-Sect members and others” truthful FBCCP records and protect all Townsend ET AL’s Rights.

53. At all times material hereto, the Defendant Charles Denny IV, Individual, Esquire and as P.A. and Anthony James Rolfes, Individual, Esquire and P.A. was employed and in a partnership with Defendants, Dickinson & Gibbons, P.A. all Florida Professional Associations, doing business as a partnership known as Dickinson & Gibbons.

54. Since about February 2003, Gray represented herself as an honest skilled attorney and was retained for her allegedly providing Honest Services to Townsend ET AL by Scruggs and “Others” to assist Scruggs to get records, protect and litigate Townsend ET AL’s Rights. Gray in her court appearances to Judge Gomez participated not for the Honest Services for which she was retained but participated in deprivations for the “McKay Plot” co-participants. Gray in her court appearances before Judge Cook in August – December 2009, at least to Townsend concealed: she had been under investigation by the Florida Bar; had offered her Consent Agreement to stop her practice of law; and had in the Court of Judge Cook was in violation of her Consent Agreement she had offered to the Florida Bar and the Florida Supreme Court. Upon informing the Court of Gray’s Default and lack of standing in representation of herself and her co-participants, Judge Cook for the “McKay Plot” ignored due process and the law and the fraud on the court by Gray ET AL and judge Cook dismissed the case even though the wording was as written by Judge Crenshaw but again included the Beck ET AL co-conspirators and the demand for further records production of and from the co-participants and FBCCP Corporate Records which Townsend as now again a confirmed member was entitled to have the right to review since his first demand starting from 10/1994, but for the frauds of the “Sect” and “Sect Co-participants” as detailed herein or as further discovery will unveil intentional misuse of FBCCP members designated funds.

55. Townsend in **Townsend ET AL. vs. Gray ET AL** 06-6005, 2D10-774, SC11-1042, timely notified the 13th Circuit Court, 2nd DCA, then the 5th DCA, then the Florida Supreme Court which ruled May 26, 2011, they have no jurisdiction despite their decision to treat the appeal and Amicus Brief as a “Notice to Invoke Discretionary

Jurisdiction”. The 5th DCA thus entered their 6/1/2011, Order and only to this day have revealed the “Mandate” page stating “cc: (Without Attached Opinion)” and as one attached herein. The issues of the complaint including the lack of “Honest Services” of Gray and her co-participants are in unison to the claims by the Florida Bar and per the claims in **Robinson v. Weiland, ET AL** 5D05-2380, as for which Gray was disbarred and ordered to provide restitution to her other victims.

56. Likewise Popper and “ET AL others”, as McKay Plot Chapin ET AL do many “Gray like” ethic breaches, acts/omissions as delays, frauds and wastes of Townsend’s over \$40,000 paid to Popper/Chapin and extortion payments since 1987 to obtain “Honest Services” to obtain said records and Orders to Produce but they conspire to not obtain Records and never sought sanctions or proofs for Lanes/Williams frauds or for the lost years of Townsend ‘s Reputation and Business which assists these Defendants Criminal Enterprise even abducting and using for extortion The FBCCP, “The Body’s” kids, property and Religious By-Laws Contract Right to Vote without fraud as a “Body” as all of the same pattern of “Lack of Honest Services” for which Gray was for Townsend ET AL retained, paid and agreed to perform when meeting with Townsend, March 2003.

57. Townsend also believes and alleges these Defendants and “others Doe” know and Knew production of said “Joint Venture” Lane ET AL Records will show, prove and connect 1987-now motives, bribes and thefts to damage Townsend in a “false public light” as defendants and “others doe” still try to do as they do in the same defamation and collusion to not expose FBCCP records to “The Body” as Townsend per his Supreme Court Ethics Duty is to expose and Report and exposure of truth vindicates Townsend.

55. The FBCCP Body upon the 10/9/1994 “Public Business Meeting Admission” by

“Sect Jeffers/Nasworthy/Beck/Powells/Nunez’s” and “others” directed CPCS Pastor Dr. John Berry, Trustee Jim Kerns (through 1997) and Townsend as the FBCCP Supreme Court Ethics Member to investigate all acts/omissions of the “Sect” and report back to the Body which Non Members by torts of “Gibbs- Jeffers-Grant-Poppers, Sheriff Deputies, Bar Officers and Even Florida Supreme Court Judges and Bondi as Government” ET AL And “others” still impedes.

58. Based on other “Sect” and “Sect Agents” frauds, on 09/08/1999, at the “Demand Meeting” Officer Townsend for “The Body” stated and still states by or with this Federal Court Filing: (1) Show me the money; (2) Stop your building scheme frauds; (3) Stop frauds to my children, family, friends and “The Body” and Citizens.

59. Defendants and “others doe” since about 1994 and after, at all relevant times still knowingly conspire via Jeffers/Howlett/Gibbs/Grant (alias law enforcers) ET AL’s ongoing violations of By-Laws, Laws and or employment Contract(s) of the; “Sect Clergy (Nasworthy, Beck) and Employees (Paula Powell, Karen Jeffers) and FBCCP Committee Members (Tim Jeffers, Joe Howlett, David Powell, Gary Leatherman, Geoff Smith, Jim Leahy, Bob Giles, Frank Edwards, Jim Bates, Duane Milford, Buddy Rawls, Mark Nunez, Dr. Lon Lynn) and Others doe”; “Sect Non Members as Deputies Tim Jeffers, Joe Howlett, Mike Smoak” and “Sect Agents” (David Gibbs III, John A. Grant Jr. and “others doe”) when joined by (Clergy Meister (1994), Brown (8/1993), Ferguson (1/14/96); Deputies Mike Smoak, Mike Corbin; Employees April Beck, Gayle Lynn, Karen Harrod Townsend and “others doe”) and Dr. Lon Lynn; Ed and Judy Hopkins; Jackie Corbin and “others doe” have by self- dealing Deputy Jeffers ET AL torts under color of law violates the By-Laws, impedes, conspires and does torts against the FBCCP

Corporation, The Body, Citizens, and Townsend as Townsend ET AL in our Fiduciary Due Process investigating and reporting for the FBCCP Corporation and The Body the By-Laws violations and Criminal Acts/omissions of the “Sect” as Defendants and “others Doe”. Each Defendant and “others” knowingly join Jeffers ET AL in frauds to deprive Plaintiffs Civil, Constitutional and Contract Rights.

60. Townsend believes and alleges that Plaintiffs have been deprived and ignored of their Rights all the more because of Defendants Criminal Enterprise to “keep Townsend in a false public light” to conceal the malfeasance of Popper ET AL started by not obeying his client’s Townsend’s Truths about Lanes ability to fraud at all times and the facts/omissions of the Future/Sabal Contract Rights. Popper ordered for Townsend to “limit your business and this escalated to “Do not do Business until I get the Declaratory Judgement on the alleged Restrictions in the contract” and this 1987-present loss of business defamation and time causes Townsend greater financial losses as Townsend’s Clients had advised Townsend to start his own business because of his integrity and abilities as the clients had refused to do business with Lane. Unethical acts/omissions by Lane caused Lane being banned by the clients and these unethical acts/omissions continued and became facts/omissions Popper, Williams, Chapin ET AL and others used to make Townsend the fraud once these Bar Members are entrapped in malpractice by Lane’s frauds inducing Townsend into signing the contract and then in fraud alleging “restrictive clauses” that did not exist in the negotiations to sign the contract or in the contract itself. Townsend had no need to sign a contract with Lane or “stop doing any business” with honest friends had it been known Lane actually did not have contracts/omissions with the Manufactures listed in the Contract as Lane alleged in 1987.

61. Failure to obey the Truth of the Contracts/omissions and Lane/Popper ET AL advising Townsend to “not talk with clients as potential witnesses” cost Townsend a “false public light” and lost undetermined money to Future Marketing and the requirement that Defendants cannot prosecute Defendants for criminal acts/omissions done in this Criminal Enterprise or this gives credit that Townsend is ethical and truthful back to the 8/7/1987 signing and before and that then the Frauds and Criminal Acts/omissions of Lane are unlawful.

62. Popper ET AL’s betrayal defaming Townsend causes all to fraud and “omit truthful disclosure”. Notwithstanding the ability by Defendants to perform their acts/omissions still does not immune their intentional unlawful acts/omissions , abductions, abuse of process and deprivations of Plaintiffs by Defendants and “others” monopoly over the “truthful records inspections” and “restraint of trade and commerce” and “restraint of Civil Rights” and Grand Larceny.

63. Defendant, The Florida Supreme Court (F.S.CT.) by its Judges and Agents owes a duty of care per the U.S. and Florida Constitutions and Laws and their own “Oath” to serve per the **Black Letter Rules** as defining “Injury” and “Potential Injury” and the F.S.CT. is in breach of its Fiduciary Duty and Contract for Lawful and Honorable Services by their intentional “impeding, detaining” and blocking facts/omissions from being included in the “Four Corners” of: complaint(s); By-Laws Nominations Supreme Court Reports; and or Civil, Criminal Court or Tax Evasions Report to “Redress Oppressive Government Persons” as conduct of defendants and “others doe”, the Judges and their “agents” by “fraud, extortion, collusion and arbitrariness” and larceny uses: violation of F.S.§775.03 “Benefit to Clergy” Law; omissions of truthful disclosure;

frauds; silence to specific questions of law; and torts; by their subjects and agents (especially the frauds and ongoing criminal acts/omissions of Beck/Jeffers ET AL, Gibbs, Grant, The Bar Members and Karen Harrod Townsend ET AL) to continue their Criminal Enterprise in acts/omissions as a waiver of defendant Sovereign immunity under the Florida Tort Claims Act as treasonous acts/omissions against Federal and State Constitutional Laws.

64. In the criminal enterprise proved and even admitted by these same persons as in their Aisenberg Case Plot heard by Federal Judge Merryday, we may never truthfully know “who abducted the Aisenberg baby” but in this case we do know and can prove who are the “scienters” and participants who abducted and to conceal their abductions, still “abduct” the innocent kids and now tax payers rights as a “sham” to conceal their “unjust enrichment” by frauds at deprivation of Townsend (As Future Marketing or as Sunbelt or KMART Employee) and those for whom Townsend (F.S.617) speaks as FBCCP, FBCCP Congregational Body MEMBERS and tax payers. Non Law Enforcers seeing and knowing the “Self Dealing” and deprivations of Law Enforcers willfully and recklessly joined their co-participants for their own self dealing violations of Plaintiffs.

65. The Criminal Enterprise acts/omissions or omissions of defendant Popper as F.S.CT. ET AL illegally and unconstitutionally for “detainment” and “Obstruction” to continue their “Under Color of Law” Criminal Enterprise ignores theirs and all Defendants “Frauds”, “Estoppel” and Unlawful Criminal Acts/omissions up to and including their “1999 Aisenberg Pattern” inducing Karen Harrod Townsend’s Attempted Pre-meditated Murder(s), Abductions, Grand Larceny, Frauds, Abuses and Batteries by the maternal family as All Harrods (Don, Norma, Steve, Keith) on Townsend and his kids

through 5/12 to Plaintiffs and uses: (1) Omission of Truthful disclosure; (2) The 1980 (Jenkins v. State 926 So 2d 1262 (Fla. 2006) and 385 So 2d 1356 (Fla. 1980) cases and related law out of context allegedly allowing a violation of Due Process by co-participant agents conspiring and doing Per Curium Affirmed rulings to conceal frauds and criminal acts/omissions thus removing citizens Due Process and Redress of Government by Government Agents violations of Civil Rights; and (3) Rules of Civil Procedure used for their “arbitrative” application and or that a victim must make a “Short or Plain Statement” used as deception or that Plaintiff “failed to state a cause of action” to limit exposure of Bar Members and “others” violations of their own rules and are thereby are “Dishonest Services as “frauds in court and extrinsic frauds”; as Rules of Court, as a means of the criminal enterprise for their agents and lower courts to do “fraud, collusion and arbitrariness” by F.S.C.T., Florida Bar Officers; and lower court agents and “others” in this case even “alleged clergy”; as agents to continue their criminal enterprise to “Impede” Civil Rights, be unjustly enriched of Plaintiffs “Constitutional Right to Vote” or as a “Jury/Body Vote to keep Government providing honest services” not illegally: taking our children and property; and or detaining children and property by larceny; (4) Florida Constitution Article IV. Section 3.(b). stating “Incapacity to serve as governor (or others) may be determined by the supreme court upon due notice after docketing of a written suggestion thereof...” is used as a “threat” to “others” and or as “Bar Members” serving in “Government” alleged Ethical Offices (5) by Arbitrariness selectively applying “threats”, ”fees”, “immunity” and “Quid Pro Quo” dealing of their “alleged” Powers (had they taken their oaths) and “Property” which are by larceny obtained from Plaintiffs.

66. By F.S.C.T. Justices knowledge of Contract failures to provide: honest services; and

“Good Behaviour”; and failure to timely take their Oaths of Office defendants in doing their Operational Functions are not immune from suit and or prosecution by their actions or by the unlawful acts/omissions of themselves, their agents and co-participants per “F.S. 768.28 **Waiver of sovereign immunity in tort actions...**” and per **KAISNER V. KOLB id.** that these intentional acts/omissions of “Grand Larceny”, Abduction of Children and Constitutional Contract Rights and “Hate Crimes” to religious persons show A conspired failure to provide honest services are part of their criminal enterprise as:

“F.S.768.28(9)(a)...The exclusive remedy for injury or damage suffered as a result of an act, event, or omission of an officer, employee, or agent of the state or any of its subdivisions or constitutional officers shall be by action against the government entity, or the head of such entity in his official capacity, or the constitutional officer of which the officer, employee, or agent is an employee, unless such act or omission was committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property...”

as all “Defendants and Government Persons” and “others” knew or have been lawfully informed by Townsend of their “Risk” of their frauds and detainment since 1988 or before or after of their violations of law, negligent care, unlawful detention and frauds and are liable for damages Townsend Plaintiffs ET AL have and are still suffering from their same collusion, extortion and “daily threats” by the “Government persons malitia” having illegally by frauds invaded and took our property, homes, business, Churches and “Christian Private School” and our kids to conceal truthful evidence as this 2nd DCA, 5th DCA ET AL and Florida Supreme Court ET AL continues to do from citizen victims as now Respondents/Plaintiffs/Appellants/Citizens who per our Contracts/omissions have rights to “be safe”, “vote or speak in our Church without fraud or fear”; vote without fraud” and “not be impeded” by “Government Persons” or “others” per F.S.§768.28. 67. F.S.CT. and judges and co-participants intentionally acts/omissions in specific

violation of:

“Florida Constitution Article II.: Section 5. **Public Officers.—(a) emolument...(b) Oath...(c) The powers, duties, compensation and method of payment...**Section 8. **ETHICS IN GOVERNMENT**” and Florida Constitution Article I. Section 3. **Religious freedom,--** There shall be no law respecting the establishment of religion or prohibiting or penalizing the free exercise thereof. Religious freedom shall not justify practices inconsistent with public morals, peace or safety. No revenue of the state or any political subdivision or agency thereof shall ever be taken from the public treasury directly or indirectly in aid of any church, sect, or religious denomination or in aid of any sectarian institution. **Section 4. Freedom of Speech and press.—**Every person may speak, write and publish sentiments on all subjects but shall be responsible for the abuse of that right. ...In all criminal prosecutions and civil actions for defamation the truth may be given in evidence...”

and other Laws as included herein to conceal and direct the “conflicts of interest”, Quid Pro Quo payments and illegal acts/omissions of larceny and “fraud, collusion and arbitrariness” by these defendants and “others doe” causing violations of F.S.914.23 and related Federal Laws to intimidate Whistle Blowers reporting Federal and State Law violations by “Bullying” retaliations and impeding a witness, victim, or informants as these Plaintiffs for whom Townsend speaks even using FBCCP, THE BODY and citizens designated religious funds in frauds against Plaintiffs. Additionally, for “fraud, collusion and arbitrariness” to conceal violations of F.S. 839, **OFFENSES BY PUBLIC OFFICERS AND EMPLOYEES** do F.S.837 Perjury for violations of F.S.914, Witnesses for criminal proceedings and F.S.843, Obstructing Justice Laws and has been committed by each defendant and “others doe” since Lane (1987), Popper (1988) and each defendant has stated by themselves or through others and admitted intrinsic and extrinsic frauds and frauds at law in: the FBCCP “assembly of THE BODY”, the “public light” including Plaintiffs work places and in courts to: “wrongly defame”; “fraud”; “detain”; “extort” and “impede” Townsend and those for whom we speak as Plaintiffs

from our “Jury of our Peers” who seek restitution per F.S.§772 and various laws to be put in the “Four Corners” of the complaint(s) after discovery is not impeded by participants.

68. Further, in violation of F.S. **TITLE XLIV CIVIL RIGHTS CHAPTER 760** hereinafter as the **HUMAN RIGHTS ACT OF 1977** defendants and their agents have intentionally and knowingly in collusion assisted Tim and Karen Jeffers, Nasworthy, Beck, Meister, Karen Harrod Townsend, Howlett, Smoak, Corbins, Leatherman, Powell’s, Nunez, Rawls, Bates, and other members listed herein, Gibbs, Lane ET AL, Popper ET AL; FDLE agents; Grant; Scruggs; Gray; Denny; Sheriffs; State Attorney(s); Attorney(s) General(s); Governors; Judges and all defendants and “others doe” to criminally act against Plaintiffs in our Duty and Right as: individual persons; “THE BODY”; and in our employment(s) and votes.

69. F.S.CT. and their “co-participants” being duly informed: of their misfeasance and malfeasance torts; as are causes for recusal; and their arrest; and Demand of Restitution; Defiantly ignore Townsend’s statements as confirmed by or of the ruling(s) by:

(1) the 11th Circuit Federal Court case 08-10721 of October 6, 2008, affirming patterns of “ineffective counsel” Townsend alleged since 1988; (2) 2007 Statements by Federal Judges James Moody, Jr. and Judge Merryday; (3) F.S.CT. Case SC09-1121 own disbarment of Attorney Gray upon her own admissions of guilt as Townsend ET AL hired her to expose but she did the same conspiracy of malfeasance of Popper ET AL since 1988 till current times; (4) Judge Orfinger ruling(s) 9/1/ 2006 confirming acts of conspiracy and concealment by Judge’s Rom Powell, Strickland, Belvin Perry, Stroker, and “Others”; (5) Statement of Florida Bar Investigator John B. Root Jr. Assistant Staff Counsel to Townsend and Letter of 2/7/1994, admitting an extrinsic Bar investigation:

“This is the worse case of abuse by an attorney on a client in my over 27 years investigating cases for the Florida Bar but my boss has told me to close this file and never talk to you again! Good-bye!”

after Townsend contacted on 3/1/1994, and 6/1999 and fully informed Florida Bar Officers Tim Chinaris and John Boggs for Harkness and Berry ET AL who threatened “If you ever get your law degree within six months I will find a way to have you disbarred!”; (6) The Handwritten “Threat” letter (2/16/2007) of Attorney Scruggs to Townsend and as a confession to Judge Stoddard admitting “intentional” “ineffective counsel” to omit truthful disclosure since 8/2000 and his Quid Pro Quo Emolument Bribes to provide fraudulent and extrinsic fraudulent services to Plaintiffs; (7) The 2004 Confession of illegal acts/omissions by Judge Gomez hearing the 02-4974 Divorce Case; (8) Judge Crenshaw appointed and as directed as Quid Pro Quo by Bush, Crist, Bar and Court Officers and “others”, was assigned case 02-03812 from Judge Arnold in 2003 and does in collusion, delay, ignored the December 2003-2006 Discovery Demands of Townsend, and FBCCP Member/Officers Townsend ET AL’s “Impeded” Rights, and Respondent Townsend’s Rights; used overturned case laws and “other acts/omissions ” as listed herein: Ruling of 9/7/06 and after being fully informed stated in the transcript “all things are related” but continued to ignore still ongoing crimes and frauds of her co-participants and also to bar “new discovery” and her Amended III, 02-03812 complaint “connecting her co-participants per the Pellegrini v. Winter Rule” to “obstruct” as the pattern of her co-judge and not answering or allowing full disclosure as Townsend demanded per the F.S.111.07 (Public Officer Defense and Disclosure of Representation) Law as “Attorney Denny, who is paying you?” and as Crenshaw did recuse herself without following Townsends Verified Demand to her and her superior Executive Sheriff Gee and “others”

follow F.S. § 38 to continue the malicious enterprise and bar Townsend connecting these Defendants and “others Doe” sued in the **Townsend v. Beck ET AL** 02-03812 Third Amended Complaint she approved as she wrote and Amended as filed 8/10/2006, based on new “partial” discovery Ordered per her May 10, 2006 Ruling and in “Fraud, Collusion and Arbitrariness” re-writing The Complaint and Malicious Prosecution Count per the plot to not expose her and her co-participants as obeying the **Robinson RULE** would do thus showing her and her co-participants multitudes of criminal patterns and as “Judicial Error(s)” even repeated by Judges Cook, Orfinger and the F.S.CT. in 2004-2011 Gray (Disbarred 2009) ET AL “ineffective counsel” Complaints affirmed by multiple co-defendants as co-participants at relevant times confirmed frauds; (9) F.S.CT. Justice Charles Canady formerly of the 2DCA and at relevant times since 2004, reviewing Townsend ET AL cases from the Appeals of the 13th Circuit Court judges did his ruling in SC2011-41, 12/21/2010 to Disqualify the entire 2DCA of which he was also in these previous rulings thus admitting his own past malfeasance and grounds for recusal; (10) Judge Canady as for all F.S.CT. Judges now in 5/2011 by their recusal from **Townsend ET AL v. Gray ET AL** having obtained review from 5TH DCA Judge Orfinger thus admits co-participant felony “fraud; collusion, arbitrariness” in these related cases back through 1988 as the position of Townsend proves consistent and true against all participants as Judge Orfinger did estoppel; (11). Attorney General Bob Butterworth’s report AGO 96-41, exposes violations of F.S. §876.05 through 876.10 as F.S.CT. Judges at relevant times violations of law and contracts/omissions frauds as Judge Orfinger for 5th DCA by **Robinson id.** proves by Florida Bar Members, “Others” and F.S.CT. judges P.C.A. of **Townsend v. Popper, Williams and Chapin** by not taking their oaths of office

while illegally ruling in Townsend's cases and overseeing Bar Complaints by: Justice Anstead appointed 1994 with Oath filed 10/2007; Justice Quince appointed 1998 with Oath filed 10/2007; Justice Wells appointed 1994 with Oath filed 10/2007; Justice Pariente appointed 1997 with Oath filed 10/2007; Justice Cantero appointed 2002 with Oath filed 2007; Justice Bell appointed 2002 with Oath filed 2008 and resigned in 2008; Justice Lewis appointed 1998 had Oath on file in 1999 yet not from 2006-October 2007 and not on file timely for the ruling denying appeal of the *Townsend v. Townsend ET AL* case 05-9605, Malicious Prosecution from cases 01-15813 and 01-15814 to have been Appealed by Heather Gray Et Al and proof of extrinsic fraud and "fraud, collusion and arbitrariness" filed June 2007. In addition, F.S.CT. Chief Judge Canady at relevant times serving the 2DCA in and before 2007- must by law be recused as he by his SC2011-41 ORDER assigning the 5DCA and recusing the entire 2DCA and later F.S.CT. incriminates himself and "co-participants" in *KAISNER V. KOLB id.* ongoing "bad faith, omissions acts/omissions and detainment" by "fraud, collusion and arbitrariness" from related matters in this case dealing with each Townsend case including *Townsend v. Lane (Sabal)* 659 So. 2d 720 (Fla. 5th DCA 1995) 1.540 and 1.530 actions as collusion with Chapin ET AL by Judge Stroker (Transcript 5/8/96), as illegal collusion to ignore the Lane *Order to Produce* of Judge Muszynski since 6/27/1989, as proved by the Ruling of 5th DCA Judges Orfinger, Lawson and Sawaya in *Robinson v. Weiland, ET AL*, 09/01/2006, using *Townsend v. Lane id.* Discovery and Hearing Rule quoted herein. 70. The F.S.CT. in 2011 after being informed of F.S.CT. and its agents incrimination of "frauds, collusion and arbitrariness" and related criminal torts Townsend alleged since about 1987 as confirmed by the Judge Orfinger *Robinson* Rule exposing co-participants

from Lane/Popper ET AL violation(s) in *Townsend v. Lane*; *Townsend v. Popper ET AL* 98-1866, filed 7/6/1999; *Townsend v. Chapin ET AL* 98-2111, filed 7/6/1999; *Townsend v. Beck ET AL*; *Townsend v. Scruggs ET AL*; *Townsend v. Gray ET AL*; *Townsend v. Karen Harrod Townsend ET AL*; continues “fraud, collusion and arbitrariness” and concealment of connected felonies of Thefts, Unjust Enrichment, Frauds, Frauds to and By “Law Enforcers” even in Courts and Child Endangerment and Abduction as Extortion to witnesses reporting Federal Crimes and did recuse themselves and unconstitutionally for continuing omissions of truthful disclosure and “fraud, collusion and arbitrariness” appointed their “agent” justices (Jackson, Grate, Jenkins) per Florida Constitution Article V. Section 3(a). “When recusals for cause would prohibit the court from convening because of the requirements of this section, judges assigned to temporary duty may be substituted for justices.”. F.S.CT. and co-participants to again: (1) ignore the 11th Circuit Court’s Ruling of “ineffective counsels” and (2) their 2009 disbarment of Gray contracted in 2003 to litigate all causes and Rights for Townsend ET AL and (3) to repeat the same criminal plot to “impede” discovery Townsend needs as confirmed by the **ROBINSON RULE** as attorneys McCarthy and Popper demanded when retained since 1987, as required for a fair trial verses Lane ET AL’s frauds and so to continue their “defamation of Townsend” still “threaten”, “offer bribes”, “detain” and “impede” and violate FBCCP By-Laws; “Due Process”; U.S. Constitutional Rights and Plaintiffs per the pattern as they use “law enforcer(s) non-members” to do torts to those for whom Townsend speaks as F.S.617 FBCCP ET AL.

71. Townsend alleges and believes the F.S.CT., JQC, or their agents and Florida Attorney General(s) cannot “un-ring the bell” on their past felony violations of law and in light of:

Florida Constitution Article I. Section 15. **Prosecution for crime;...**(a) No person shall be tried for capital crime without presentment or indictment by a grand jury, or for other felony without such presentment or indictment or an information under oath filed by the prosecuting officer of the court..."

And therefore Plaintiffs cannot expect these defendants to seat a Grand Jury for purposes of a presentment or indictment and also cannot expect a sub-agent of same to perform an information under oath against ones alleged superior officer. In fact, Townsend has at multiple times demanded a "law enforcer" of this State lawfully act and even to no avail contacted through the advised process of the Florida Attorney General (Crist, McCollum thru Bondi) the seated Statewide Grand Jury per SC09-1910 begging to be called to testify under oath and report these felony acts/omissions as stated herein. Defendants and "others Doe" as stated since the words of McCarthy, Landis, Popper and Chapin (since Chapins admissions using the illegal services of Governors Chiles and McKay and "Others Doe" at that time now still being exposed) willfully impede the collection of evidence and the testimony to report these felonies of which now all Plaintiffs still suffer.

72. Townsend alleges and believes in light of the number of Florida House of Representatives Members and Other Florida Government Officers who are or who are related to Bar Members and the "arbitrariness" by which they and Florida Bar Officers and the F.S.CT. violate the Law and their Own Rules, these Plaintiffs will not be able to have relief through a Florida State Court or a Florida Legislative Process as the Judicial Branch and Legislative Branch are so commingled in violation of Florida Constitution Article II.:

Section 3 stating: "...No person belonging to one branch shall exercise any powers appertaining to either of the other branches unless expressly provided herein ...Section 5. Public Officers.—No person shall hold at the same time more than one office under the government of the state..."

73. Townsend alleges and believes in light of his willingness to assist, testify and even wear a wire in cooperation with the FDLE Orlando Office investigation Townsend started as a result of the Chapin Bribe “Look we know you have been damaged. If you drop your complaints you will be paid through Chapin’s son’s restaurant company for finding them new locations” Chapin and Popper offered after leaving the chambers of Judge Stroker, that the failure of FDLE to act lawfully since that time shows negligence and criminal acts/omissions of the enterprise of the FDLE, each agent and their co-participants as the FDLE does not want to incriminate itself or its agents who were that time following Orders per their commands of their Superior Officers including Governor’s Chiles and McKay trying to protect political protégé and friends, Linda Chapin and her husband Bruce Chapin as continued by Bush/Crist for their self-dealings.

74. Additionally, then these same FDLE, Attorney General, Florida Bar Members as Agents and “others Doe” who served the illegal services of Chapin ET AL, Chiles and McKay and “others Doe” have in collusion with Crist ET AL, Bondi ET AL and “Others” continued and still continue the “acts/omissions /omission’s” negligent services to the Plaintiffs.

75. Townsend alleges and believes Bruce Chapin by his being a Special Mediator for the Florida Supreme Court and the political status of Chapin through his wife Linda Chapin as Chairwoman of the Orlando County Commission being vetted to run for higher political offices created a hostile court(s) and Bar Grievance Processes since Judge Rom Powell, Bar Officers and Governors and Government Persons named herein and “others” prejudiced to oppose Townsend revealing betrayal and fraud by Lane/Popper/Williams/Chapin ET AL continuing at the time of this filing in 2012 their

Pellegrini id. 32 Florida Jur.2d *Joint and Several Tortfeasors* §§1,2. Criminal

Acts/omissions and acts/omissions of defamation and Malicious Prosecution as judge Crenshaw and Judge Orfinger in 09/7/2006 and 9/1/2006, respectively, confirmed.

76. Thus this cause requires Class Action status in Federal Court and to be heard by a jury to insure Florida Citizens protection and not “impeded” of U.S. Constitutional Rights guaranteed here by contracts/omissions as even stated in Florida Constitution Preamble:

“We, the people of the State of Florida, being grateful to Almighty God for our constitutional liberty, in order to secure its benefits, perfect our government, insure domestic tranquility, maintain public order, and guarantee equal civil and political rights to all do ordain and establish this constitution... and Article I Section 1. **Political power.**—All political power is inherent in the people. The enunciation herein of certain rights shall not be construed to deny or impair others retained by the people....Section 24. **Access to public records and meetings...** Section 25. **Taxpayers’ Bill of Rights...**”

quoting and including for purposes herein through the entire Florida Constitution as for illegal means these defendants and others have usurped the laws of our citizens as a jury.

77. Governors Lawton Chiles, Governor Buddy McKay, Governor Jeb Bush, Governor Charlie Crist per his Fiduciary and Contract Duty to the citizens of Florida and FBCCP Members as these Plaintiffs had a duty to per “F.S.§ 905.33 Grand Jury Petition to Supreme Court” to request to impanel a Grand Jury to investigate these claims of conspiracy and the corruption to win their elections but by did their conspired unlawful acts/omissions as a threat to impede the public’s knowledge and obstruct justice these Governors as co-participants failed to provide “Honest Services” but willfully aided and abetted in ongoing criminal acts.

78. Governor Buddy McKay, did his conspired unlawful acts/omissions /omissions as a threat to impede and obstruct justice to the Citizens of Florida to advance and win

his desired political positions being on the Democratic Ticket with the extremely popular, Linda Chapin, that Bush via information from Townsend was able to upset.

79. Governor Jeb Bush(Elected 11/4/1998) did his conspired unlawful acts/omissions and omission of truthful disclosure to for self-dealing and fraud, advance himself Quid Pro Quo as a threat “under color of law” politically to impede and obstruct justice for the citizens in collusion to protect his use of the Chapin/Chiles/McKay illegal acts/omissions information gained from Townsend.
80. The Florida Attorney General’s and FDLE Agents and Florida Bar Members therefore Quid Pro Quo acted and omitted “Due Process” in collusion with Bush in order to maintain their “Law Enforcers” positions acting in “Alleged Honest Services”.
81. As Attorney’s General and then as Governor Charlie Crist (since 6/1999); did his conspired unlawful acts/omissions as a threat to impede and obstruct justice and ride the coattails of the Bush’s and Republicans and was able to do so until National Republican’s and the media were informed of Crist ET AL’S “Odious and Outrageous” acts.
82. The FDLE Members since or about October 2, 1995 and in 1998 and multiple other times by personal visits, letters, E-Mails and phone calls have been informed of the acts as reported in this Complaint yet they fail to provide “Honest Services” and themselves make threats to stop reporting these criminal acts of themselves and their co-participants.
83. Attorney’ General Bill McCollum, did his conspired unlawful acts/omissions as a threat to impede and obstruct justice.
84. Judge Marva L. Crenshaw: a Florida Bar Member since about 1976; and

appointed to the 13th Circuit Court in 2000, by Governor Jeb Bush; appointed to the 2DCA by Governor Charlie Crist to begin serving on 2/1/2009. From 2003 Until her Order of Recusal of 2006, Judge Crenshaw: omitted truthful disclosure, detained, deprived and caused illegal actions by herself and her co-participants and still by her intentional actions detains Plaintiffs of their Contract and Constitutional Rights.

Townsend alleges and believes that the act of May 10, 2006, by Judge Crenshaw acting at the directive of her superiors “alias law officers” from which she has received special Quid Pro Quo pay-backs and Attorney Denny (in a position of collusion and conflict of interest trying to represent Beck ET AL and FBCCP and “all other FBCCP members”, Dickinson & Gibbons and Denny’s insurance carriers and “others doe” at the same time against proved still derivative acting member Townsend) by the defendants to re-write the Townsend ET AL v. Beck ET AL. 02-03812 Count for Malicious Prosecution was at the directives of her superiors and co-participants not for judicial expedience but to omit truthful disclosure of the participants and the illegal actions of the criminal enterprise of her alleged alias masquerading “law enforcer” co-participants herein and “others Doe”.

85. Defendant Charles Scruggs (since July 2000), advised Townsend ET AL “allegedly” as an “Ethical” Former Judge and Expert Lawyer providing “Honest Services” and advising Townsend on the handling of the legal issues stemming from Townsend ET AL v. Lane, then Popper, then Williams, then Chapin and “others” as Townsend wrote his legal briefs and actions. In April 2002, Townsend after being served Divorce Papers (case 02-4974) again in a lengthy office meeting met with Scruggs regarding the ongoing case and filing for “Discovery” and Malicious Prosecution and other restitution and handling of all legal matters.

86. Scruggs advice as Townsend now believes is to conceal his fraud and loyalties stated for his financial self-dealing purposes for Scruggs to by Quid Pro Quo conceal the criminal acts of his co-participants being paid by “undisclosed others” he would have to expose in their criminal acts since Lane should he to Townsend ET provide “Honest Services” to handle the Divorce Issues and he would advise on the related cases he with Judge Palomino by collusion separated on 11/15/2001 and did not do discovery and reveal the “Pellegrini Others”. Scruggs then later advised on September 30, 2003 he “never planned to bring the Church matters into the Divorce action” and “His personal convictions did not allow him to make a church look bad” and did his conspired unlawful acts/omissions as a threat to impede and obstruct justice for his and his McKay co-participants illegal acts/omissions as his confession to judge Stoddard 2/2006 his collusion to not expose the acts/omissions of HCSO Sheriff Deputies Howlett, Smoak, Terry ET AL and Deputy Jeffers ET AL, and Grant ET AL, inducing with the Mark Ober State Attorney’s Office ET AL, DCF ET AL, and Pam Bondi ET AL per the directives of Attorney’s General Charlie Crist, and Pat Bean the “sham” 01-15813 and 01-15814 and Divorce 02-4974 cases and “others” intentionally in public light promoting false evidence and obstructing “true evidence” in fake trials and in “public light” as now the evidence of their McKay Plot is revealed as Gray is disbarred for the same “Ineffective Services” yet Scruggs is promoted by his co-participants in RICO acts now as their Regional Council caught now in and through 2012 in many betrayals of clients not part of the RICO Gang.

87. Defendant Heather Gray ET AL since 2003, did her conspired unlawful acts/omissions as a threat to Townsend and “others” to impede and obstruct justice and to provide herself and “others” “unjust enrichment”.

88. Defendant Stacey Turmel ET AL since 2002, did her conspired unlawful acts/omissions /omissions as a threat to Townsend and “others” to impede and obstruct justice and to provide herself and “others” “unjust enrichment”.

89. Defendant Solomon Tropp, did his conspired unlawful acts/omissions as a threat to impede and obstruct justice and also to Townsend as a threat as he clearly in October 2004, in the court of Judge Monica Sierra stated in his rage and frauds to impede and obstruct justice for his “unjust enrichment” as the client of Steve Harrod as contributing manager of his connections as legal counsel with AMSOUTH Bank and others.

90. Defendant Dickinson and Gibbons since 2003, did via their agent Charles Denny did their conspired unlawful acts/omissions as a threat to impede and obstruct justice as a threat as Denny clearly in the May 10, 2006 hearing admitted and assisted Judge Crenshaw to rewrite the Malicious Prosecution count in favor of Townsend and “others” and to impede and obstruct justice Plaintiffs still seek and to provide from these Defendants and “others” “unjust enrichment”.

91. Defendant A. James Rolfes from 2003 and specifically in a hearing in the Court of Judge Crenshaw in 9/2006, did his conspired unlawful acts/omissions as a threat to impede and obstruct justice and obtain unjust enrichment from these Plaintiffs.

92. Defendant the FDLE and its members did their conspired unlawful acts/omissions as a threat to impede and obstruct justice and “others Doe” and each intentionally and knowingly breaching their contracts/omissions and fiduciary duties and improperly refusing to process the law per their legal obligations.

93. Townsend in response to the letter of 6/22/07 from FBI Agent Stephen T. Gross, reported these acts of extortion and obstruction and other crimes to further update his file

including this excerpt:

“...Per **Kaisner v. Kolb** 543 So2d 732, 1989 Fla. SCt 2682, be responsible! The deputies as confessed by Gary Leatherman, Herman Meister, Elbert Nasworthy and Others have shown that Jeffers, Howlett, Shumate, Smoak and their superior officers by allowing the gross torts of these officers to do “unlawful invasion of the Civil Rights of 1964 Act and “We thus conclude that “custody” need not consist of the formal act of an arrest, but can include any detention” **KOLB. Id.** that these officers detained me as a Church Officer and as an individual citizen/father/person by police car chases, Trespass Warnings, Court actions of frauds, assault, battery, and “false light invasion of privacy” and thus by these actions did unlawful kidnapping of the children and RIGHTS of these as the FBC Congregation, FBCCP Corporation and members and citizens by their over 10 years of deceptions and frauds and all criminal acts! Fraud detained FBC/members acts! Does the F.B.I and other Government Agencies and Officers say “fraud” is allowed to Impede a FBC? If yes, then you know you are violating the “NO LAW SHALL IMPEDE THE OBLIGATION OF A CONTRACT” clause in our Constitutions!

And no response was received and it was later learned Agent Gross had been relocated.

94. Townsend further met with the U.S. Attorney’s in the Tampa office and later it was learned these persons were relocated and some fired by acts of George W. Bush.

95. Defendants as Numerous “persons” as Judge Merryday and Judge Wilson and “others” as defendants were notified of these Plaintiffs as Appellants Initial Brief and Appellants Supplemented Initial Brief and other proofs of evidence served to them personally and as posted on the web at www.Judgeoneyourself.com.

96. Defendants per the threatening e-mails to Townsend from John Grant Jr. demanding Sheriff David Gee and State Attorney Mark Ober to do unlawful fraud and then the resulting phone call of 1:12 hour from Hillsborough County Sheriff Deputy (HCSO) Jason Vanbrunt (Vanbrunt), “requesting” at the strong demand of himself and his superior officers responding to the 11/9/2009 e-mail of Former Senator/ Registered Agent (until 04/08) of FBCCP John A. Grant, Jr.: (1) do not contact Former Senator John A. Grant, Jr. again, (2) do not attempt to return to the FBCCP and thereby violate the

HCSO issued Trespass Warning of 10/28/2007, (3) do not attempt to violate the Divorce Injunction of 2003 and or contact your kids.

97. This continuing unlawful threat from John Grant/ Sheriff David Gee/ State Attorney Mark Ober ET AL for all Defendants and “others Doe” was again stated in the direct confrontation as extortion and obstruction of justice by HCSO Deputies 3/31/10, as HCSO Intelligence Detective Darby, as they without jurisdiction unannounced arrived at Townsend’s Sarasota residence and made the threats of: 1. Stop contacting John Grant; 2. Get on with your life and stop filing lawsuits; 3. Stop trying to contact your Kids and those at the church. Townsend in a follow up letter in May 2010, further advised Detective Darby of other criminal actions of defendants and demand for HCSO law enforcers to obey the law yet no response was received.

98. Townsend for Plaintiffs allege this is not just a simple case of “Law Enforcement” getting an alleged Child Endangerment, Domestic Violence and Child Interference with Custody since 9/08/1999, case wrong and in collusion as done in what Townsend has learned is their pattern to cover up Law Enforcers and Department Of Children and Families or State Attorney’s Frauds and Malfeasance but here these acts/omissions are by “fraud, collusion and arbitrariness” caused, created and continued in the criminal pattern of “defamation” and “fraud” as the **Aisenberg v. Hillsborough County Sheriffs** id. acts/omissions by these same “persons” and “others” as a criminal means to conceal their admitted roles in the “operations” of the “McKay Plot” of “Thefts” and “Quid Pro Quo Acts/omissions ” of: defamation; extortion and obstruction of: records discovery; justice; due process; contracts/omissions ; and Civil Rights; to do “frauds, collusion and arbitrariness” against Respondent Plaintiffs exposing Ongoing Criminal Acts/omissions

of these Defendants and “Others Doe” began by their plot to conceal the 1988 misfeasance and malfeasance of an attorney client relationship between Attorney David H. Popper and intentionally joined by Bruce Chapin, John Harkness, John Berry, David Gibbs, Grant, Scruggs, Gray and “others doe” by “Fraud, Collusion and Arbitrariness” training “others” to defame and “impede” client Townsend and thus conceal the ongoing extrinsic frauds and other torts still being concealed by Scruggs as Executive Counsel.

99. Plaintiffs state FOUR of many possible reasons Plaintiffs could raise as our defense to show the Defendants Collusion, Motives and that “The Truth always comes out”:

(1) Newly discovered evidence. ---The *Robinson Ruling* affirming what this non-lawyer Townsend alleged since revealing these only till now proved Mens Rea conspiracy of Popper, Chapin, Judges and Bar Members not as “a mistake” of “judicial error” or “ineffective counsel” was not discovered until 2011. Also, the Judge Canady as the Florida Supreme Court Chief Justice multiple Admissions of or by Defendant Judges causing their Recusals based on past actions and not a belief of future conflicts of bias or prejudice could not occur until this case again reached the Florida Supreme Court and their decision which was just rendered this 2011 to show the Mens Rea “Fraud, Collusion and Arbitrariness” of their actions and motives as Judges acting for “self-dealing” and not per the Laws. The law is clear as a Non-lawyer is not required to act until they have “knowledge” of the wrongful act done against them and a non-lawyer is not required to act or held to a time of alleged knowing in a legal sense that the act was unlawful on “suspicion” of a wrongful act as explained in point 2.

(2) Omissions of Truthful Disclosure by Florida Bar Members and “others”--- The

Rules of F.S. §38 disclosure when a judge had been recused was always not answered or confessed by the “alias” lawful judges or Bar Members as they in collusion for themselves enacted their 5th Amendment Rule for the continuation of their “False Public Light” to their non-lawyer citizens until their now Superior Officer as the Florida Chief Judge now admits or rules a non-just more very narrow cause as their Motive for recusal.

(3) **Until Judge Orfinger reversed himself as an “Officer of the Court”** in Townsend v. Lane, Williams, Popper and Chapin ET AL and using the specific facts/omissions of this related case in Townsend v. Gray ET AL to prove his singularity for personal self-dealing motives and not a reversal based on a “legal” rule of “Arbitrariness and Frauds and Collusion” and these Florida Supreme Court Judges also show their bias reversing themselves in disbaring Gray verses upholding the dismissal for “fraud, collusion and arbitrariness” by Judge Orfinger the statute of limitations could not even start for this non-lawyer who had “trust” even now proved a “false public light trust” that if the true facts/omissions were known an Honest Court would have knowing the negligence and extrinsic fraud of Gray would have allowed Plaintiffs to have their “Honest Day” in a Florida State Court based on Florida Constitution Article 1. Section 3. as a “Jury Trial” of our peers and not entrapped and detained by treasonous Government Thugs continuing their Criminal Enterprise on Citizens and even more extremely herein on these Faith Based Citizens.

(4) **Until this ruling by Florida Supreme Court Justice Canady---The Mens Rea Plot of their Self Dealing Criminal Enterprise by Florida Bar Officers John Harkness and John Berry and their agents and “others” and the Judicial Qualifications Commission Members was not confirmed or admitted by themselves or until now**

per Respondent Superior Rule was not admitted and confirmed by their Superior Officer. With this act in 2011 of a Florida Supreme Court Chief Judge these their Supreme Court agents could not claim that their “omission” of a truthful fact in a brief or trial was not a human error but one of a calculated strategically planned plot to citizens as a “False Public Light” violation of our Trust and a Breach of their Fiduciary Duty per their Oath to the Contract of a Constitution with Citizens. As proof note the Final Summary Judgement of Judge Rom Powell of July 19, 1994, purposely using words with double meanings as “his attorney committed fraud which induced Townsend” and

“that Lane and his counsel in the original action engaged in various “Rambo-like” tactics during the discovery process which Townsend alleged were fraudulent and wrongful and which he alleged coerced him into settling. Townsend could have sought relief from the Court and insisted on going to trial on the merits.”

Judge Powell “Not” defining “his attorney” or “his counsel” changes the entire meaning of Extrinsic and Intrinsic Fraud and a Fraud “On” the Court or a Fraud “To” the Court or on the Client as Chapin/Popper betrayed “Honest Services”.

Additional proof of the collusion is shown when one notes the advice of Judge Arnold in 2003 to re-file and then consolidate the cases as Judges Powell and Judge Stroker and Judge Holder and Judge Palomino and Judge Crenshaw and Former Judge Scruggs as intentionally “ineffective counsel” all tried to keep separated until these cases and facts/omissions all come together with the 1991 Gibbs and 2003 Gray Contracts to do as “effective counsel representation” for these Plaintiffs. Until this Judge Orfinger Ruling in 2006 verses 2011 and these clarifications were not defined by a Bar Member as a Florida Supreme Court Justice thus not stopping their agents still deprivating these Plaintiffs and Citizens that we have mistakenly “Trusted” a criminally flawed Florida Court System

now causing us great Emotional Distress and loss of our Property and Rights, as Plaintiffs could not know who we must oppose for restoration of our Federal and State Constitutional Rights.

100. Florida Supreme Court Chief Judge Canady now in 2011 has admitted the

ongoing criminal enterprise of Defendants and “others” as Townsend has alleged since about 1987 and before and has stated in part to Federal Judge Moody on March 15, 2007 to which he agreed as follows:

101. Townsend had an ethical business reputation of doing a “Million Dollar Deal at or about a 5% commission rate just by making a few phone calls to his contacts/omissions”.

102. Townsend, individual and d/b/a Future Marketing ET AL on August 7, 1987, signed a Joint Venture Contract with Charles E. Lane Jr. as Sabal Marketing as Lane had been banned because of unethical practices from Retailers in part as Kash n’ Karry, Winn Dixie, Publix Supermarkets and “others” and clients which Lane needed Townsend as a partner per the contemplation of the parties (Damages \$20 proof) for Lane to conduct any business per the business needs for Corporate Clients.

103. Upon learning of Lanes Breach of Contract, Frauds and illegal acts/omissions of Lane and Unlawfully misusing Sabal Marketing, Townsend (Future) for himself and his family retained attorney Patricia McCarthy of Focht and McCarthy, Land o’ Lakes Florida for her legal advice to separate the Joint Venture and retain compensation for services rendered per the Joint Venture Contract dated August 7, 1987 and Statement of Rights Letter of January 7, 1988.

104. On March 7, 8, and 25, 1988, and May 26, 1988 (Exhibits in Florida Bar Complaints as E557, E556, E555 and E554 respectively) Townsend and McCarthy’s

letters were forwarded to Popper stating our legal positions and damages known to date and foreseeable risks Popper per his letter of April 14, 1988 (Bar E565) to Williams and Popper letter to Townsend of April 14, 1988 (E513) was expected to prevent from the frauds and delays of Lane and Williams based on their verbal and written threats known through said date.

105. Upon being advised by McCarthy, she contacted and used David H. Popper and Townsend (d/b/a Future) retained Orlando Law Firm Austin, Lawrence and Landis (A.L.L.) and their attorney David H. Popper per a contract dated June 16, 1988.

106. At advice of A.L.L. and specifically Popper, Landis filed: A Declaratory Judgment and Claim for Restitution for Services Rendered Complaint **Townsend v. Lane(Sabal ET AL)** 88-2554 Seminole County Florida (Served on Lane June 15, 1988) and Answers to Deny a Counter Complaint. No Answer was mailed until July 5, 1988 and not timely filed with the court. Popper refused proper legal services to file a Motion for Default or act per his Attorney Client Duty which if had been done at that time and a Default Granted and enforced by any and all the acts by Lane ET AL would have been stopped and exposed as their negligence and torts at that time but Popper could not let himself be charged with Malfeasance for his delaying the direct legal advice of McCarthy to get Lane/Sabal contracts per the August 7, 1987, sooner as this caused direct losses to Townsend daily right to do business.

107. Townsend now per his opinion and belief alleges Popper realized his delay in filing Subpoena's and non discovery of the frauds in the inducement of Lane to Townsend to sign the August 7, 1987 document caused great financial losses to Townsend as Popper had warned Townsend "do not do business" clients begged

Townsend to do until Popper knew the alleged issues of an alleged Non-Compete Threat by Lane and Williams and Popper ET AL continues.

108. Townsend now believes and alleges in April 1989, Popper and Williams for fraud and delay to Townsend and Judge Muszynski, jointly conspired to transferred the case to Orlando as 89-3299, as Popper on 4/3/1989, left Austin, Lawrence and Landis, (A.L.L.) to join O'Neil, Chapin, Marks, Liebman ET AL (**Chapin**) where **Chapins had leverage.**

109. Chapin being fully informed signed a **Motion to Compel Production of Documents** to Sabal via Attorney Williams on September 6, 1989 stating:

“1. On June 27, 1989, this Honorable Court entered an order requiring the Defendant to produce documents enumerated in the Request to Produce dated January 12, 1989, which pertain to any commissions that Mr. Townsend may be entitled to if they were within the time frame of February 1, 1987 through December 31, 1988.

2. To date, such records have not been received.”

110. On 10/30/1989, Judge Muszynski, per Chapin gave Lane/Sabal 10 days to comply which production is not done nor ever yet done but are acts/omissions for further fraud and delay.

111. Again July 24, 1991, Chapin at the objection of client Townsend entered another now very limited Subpoena Duces Tecum to Lane to bring to the court of Judge Powell which again Due Process and the delay to bring the action by the attorneys was ignored.

112. Further multiple acts/omissions of omissions of truthful disclosure, collusion, deception, ineffective counsel and letters from Popper, Chapin and Powell were done including the July 24, 1991, ***PLAINTIFFS RESPONSE TO MOTION TO COMPEL SETTLEMENT*** signed and filed with the court by Bruce Chapin stating:

“...4. The Plaintiff (Townsend) has now learned that significant sales have occurred during the years in question, it being the understanding and belief of the Plaintiff that sales have approached or exceeded \$1,000,000 per year during the time period involved, and between the agencies set forth above. 5. Under the

agreement between the parties, the Plaintiff would be entitled to significant commissions, and has been actively misled by the Defendant with respect to said sales and commissions.”

and thus proved motive, knowledge and intent of Popper/Chapin ET AL defendants and that Townsend was forced under duress by Popper, Chapin, Williams, Lane and Powell in violation of R.O.C.P. 1.420(A)(1) to get all Townsend’s Business Records from the Conference Room of Williams and to stop: the collusion of days of depositions; years of stalling practices and spending over \$40,000.00; and to stop “Invasion of all Townsend Trade Secret and Personal Documents” allowing Lane ET AL to make threats and extort funds from Townsends clients and family unrelated to Sabal Rights; Townsend was thereby forced and coerced to sign a settlement by parties on January 29, 1993 to conceal defendants frauds and other torts causing losses to Townsend not just by the Sabal Business Relationships but more by having lost Business Relationships with clients at major Retailers and new companies Townsend should not have been advised to not contact since 1/1988 due to the frauds and malfeasance of Popper/Chapin/Gibbs ET AL.

113.Townsend alleges and believes this act by Chapin was in direct collusion and fraud with Judge Powell in order to connive and force Townsend to settle the case and block going to trial which would expose the criminal and negligent acts/omissions of Lane, Popper, Williams and on Chapin ET AL and Chapin on January 28, 1993, in the conference room of Defendant Williams, Chapin advised Townsend that:

“we have been trying hard to keep Lane from seeing your records but actually judge Powell is believing all business Townsend has done since 1987 was due to Lane and a violation of the Non-compete clause of the contract and there was nothing Townsend legally could do but sign the settlement.”

114.Finally produced in April 1992, even the Bonneau Sunglass Contract with Sabal of June 1, 1985 only listed Publix and had ended as of May 31, 1987 thus showing the

Lane Positions to Townsend per the August 7, 1987 Joint Venture Agreement was a fraud and showing that the Lane, Williams, Popper and Chapin statements to the Orders to Produce from Judge Muszynski since 1989 were frauds to the Court and extrinsic frauds not allowing Townsend to present his case or to do his business for these lost years not with the Companies Lane claimed to represent on August 7, 1987 but also in all of the Retailers Lane falsely claimed to own and thus a fraudulent inducement for Townsend to enter into the August 7, 1987, Agreement, a Claim Popper ET AL /Chapin ET AL and as McKay ET AL have barred from being raised and being made whole, in any court.

115. On September 25, 1987, Bonneau presents a new contract which clearly is a result of Townsend's solid relationship and work product with the customers and clearly gives warnings to Lane and states:

“*Solicitation at Jacksonville Div. (Winn Dixie) level must be made with Bonneau Company personnel present. You (Lane) are not authorized to solicit Winn Dixie Corporate in Jacksonville.... You agree to operate harmoniously and cooperate with the personnel of the Bonneau Company. You will endeavor to foster good relationships between yourself, The Bonneau Company and all accounts. Under this agreement you will be prohibited to represent any other sunglass or reading glass vendor for a period of two years. You agree to conduct your business in a manner that will at all times be held in the highest respect by all of the retail stores and consuming public.”

116. Townsend however at all times was welcomed and encouraged to assist Bonneau Employees at Winn Dixie and all accounts and as of January 1, 1988, Bonneau Officers offered the Bonneau Sunglass Company only to Townsend/Future Marketing in all accounts but maybe except Publix but Townsend could not pursue this offer or pick up the Orders from Winn Dixie or Kash n' Karry and other clients Townsend had secured because of the written threats of Williams and the “restrictions at the legal advice of Popper, Landis and McCarthy”. And later Chapin and Gibbs.

117. David Poppers letter of August 16, 1993, and Bruce Chapin's letter of August 12, 1993 in response to the Florida Bar confirmed his acts/omissions of fraud to his client and the courts and participation in criminal acts/omissions with co-participants and prejudiciously acting as a Special Mediator of and for the Florida Supreme Court responsible to hear Townsend's arguments of Chapin Intentional Malfeasance and tort collusion with Popper, Williams and Lane and Judge Rom Powell, ET AL

118. Townsend as Appellant stated in the *Appellants Reply Brief* of case 94-1913, 5th

DCA for lower case CI-94-632 in the **STATEMENT OF THE CASE AND**

FACTS/OMISSIONS states:

“The fact of a settlement wherein Lane paid Townsend Seven Thousand Five Hundred Dollars (\$7,500.00)” is not a true representation of the facts/omissions. Appellant did not file a joint notice of voluntary dismissal with prejudice nor know it was done. But the attorneys did while the Appellant was detained in the attorneys offices, keeping him from persueing his rights and even blocking the Appellant from communicating with the Judge or other counsel that Appellant believed his rights were being violated even by Appellants own attorney conniving at the defeat of the client.

In an attempt to correct the alleged wrong and bring the matter to the court a new independent action was filed, since the judge had refused to allow a hearing via a motion on the old case.”

119. Per the Final Summary Judgement of July 19, 1994 by Judge Rom Powell,

Townsend timely (1) Informed the Court of Judge Powell of the frauds and “suspiciously as a non- lawyer alleged the “ineffective counsel” and unlawful threats of defendants and (2) Filed to block the “settlement by coercion, fraud and duress” and (3) per 1.540 filed case CI94-632 on January 27, 1994 seeking relief from the coercion and frauds of Lane and the Attorneys and “others” forcing Townsend under duress to get a protective order and justice from an Honorable Court as the **ROBINSON RULE** states should be the practice that Judges Powell, Strickland, Stroker, Perry and all others have not Shown to

continue their collusion through 2011 again using illegally a P.C.A. Affirmed ruling to conceal fraud the disqualification by Judge Canady finally reveals and admits.

120. Townsend alleges and believes the instructions of Judge Powell to Townsend, Pro Se from or about January 29, 1993 until Townsend timely notifying the court in writing on July 11, 1994, alleging the “fraud, collusion and arbitrariness” by Chapin, Popper, Williams and Lane known done was as extrinsic fraud and fraud on the court to that time as the Judge Orfinger ET AL 2006 ruling found in 2011 now confirms as the illegal acts/omissions and conspiracy of Judges Powell on July 19, 1993, signing a Final Summary Judgement and “others” assisting in the now proved Frauds to an Honest Court and Plaintiffs until Judge Orfinger and Judge Canady now in 2011 reveal the Mens Rea Motives of the Bar Members and “Others” to defame Townsend and deprive him of owed commissions and his Constitutional Rights and Rights of his New and Old Business contracts/omissions Lane could not be privy to by Lanes own fraudulent acts/omissions .

121. While the extrinsic fraud prohibiting Townsend from presenting his case to a jury is proved it appears these actions of Chapin, Popper and Williams to conceal their frauds on the court were not frauds on the court since as the Robinson case states, Judge Powell, Judge Stroker and Judge Strickland and Others in collusion with Lane, Popper, Chapin and Williams willfully participated in their frauds “On the Court” for their own personal self dealing as expected to be rewarded by Bruce Chapin’s wife Linda Chapin as Orlando County Commission, Chairwoman and the Orlando County Commission as was done by their vote of a new courthouse and as directed by Defendants and “others” at later times.

122. After the hearing before Judge Strickland, Popper and Chapin did offer bribery and extortion if Townsend would drop reporting their criminal acts/omissions .

123. Townsend immediately reported this Bribe and Frauds to the Florida Bar, Florida Department of Law Enforcement Officers in the Tallahassee and Orlando Offices and even agreed to wear a wire and continues by verbal meetings and written process and court filings to all defendants and “Others” continues to state the violations of law as reported herein and each refuses to obey the law and our contracts/omissions for honest services.

124. Townsend alleges these prejudices and frauds by Popper/Chapin/Bar members and judges ET AL as exposed by Judge Orfinger in the *Robinson* rule of 09/01/2006 admitting Townsend claims when seeing the Counter Suit verses LANE ET AL claims since 1988 verses the Orfinger reversal in 2011 against Townsend shows the frauds, collusion, bias and prejudice continues by defendants and “others” the discovery they block will further connect.

125. In addition Judge Crenshaw, being appointed by Governor Bush and Attorney General Charlie Crist after reading the *Townsend v. Beck Third Amended Complaint* she authorized as filed August 10, 2006, after her biased delays since 2003, on 9/7/2006, just days after the *ROBINSON RULE* did admit “all things are connected” and threaten and offered a bribe to Townsend to violate his core ethical beliefs and those for whom he speaks since 1987, as a father saying if you will just shut up I am trying to get you a lot of money. Townsend refused and still reports and refuses to violate the law.

126. When documents were partially gained years later, the frauds by Lane, Williams, Popper, Chapin, Bar Members and judges are proved causing major losses to Townsend (a/k/a Future Marketing) and now all these Plaintiffs for whom Townsend speaks.

127. In and through January 1993, Chapin, Popper and Williams in collusion delayed

production of Lane Records that Townsend by Contract was entitled to review and to this day the full production was not done.

128. Instead on December 28, 1992, Judge Rom Powell, as Townsend believes and alleges in the intentional Criminal Enterprise with Chapin to destroy Townsend in the “public light” and to tortfully “impede” his financial resources and to conceal the Popper, Williams and Lane frauds, instead privately keeping Townsend outside of the court chambers of Judge Powell so not to hear their ExParte Collusion instead Ordered Townsend to produce all “Future” and personal records even through the current date which per the alleged restrictive covenant which if true ended 12/21/1988 per the Popper letter.

129. Chapin even knowingly produced fraudulent Georgia and Florida bank accounts and alleged it to belong to Townsend hiding assets as a fraud to the court and extrinsic fraud intentionally creating extrinsic fraud on the Court and damaging Townsend.

130. On January 26, 1993, Chapin even in a letter confirmed “mistakes have been made.” And threatened upon the collusion and corruption forced on Townsend that if he did not comply with the Orders of Powell, Townsend would immediately be put in jail on January 29, 1993, so at the advice of new counsel Townsend signed a coerced settlement, got his 10+ legal boxes of records out of the office of Williams, fired Chapin and Popper and immediately informed the “alleged” honorable judge Powell now proved corrupt.

131. Townsend as Pro Se timely filed a 1.540 New Action Complaints **Townsend v. Lane (Sabal)** CI 94-632 as 659 So2d 720 (5th DCA 1995); **Townsend v. David H. Popper** (Popper); **Townsend v. Chapin** (Chapin); **Townsend v. Williams** (Williams); and also filed verified and sworn Florida Bar Complaints (Orlando 93-31, 690 Popper; 93-31, 691 Chapin; 93-31, 692 Williams).

132. Confessions of Lane and Attorney Charles Williams and Others that they by their

frauds had caused the negligence and frauds of Popper and Chapin were put in multiple papers filed to the courts and the Florida Bar show Bruce Chapin rather than per his Oath, Fiduciary and Contract Duties to advocate the Contracts/omissions (Future/Sabal, Attorney/Client, Constitutional) Rights does Mens Rea frauds to conceal the Mens Rea Frauds of himself, Popper, Williams and Lane and Judge Powell as Townsend alleged since alleged and confirmed per the 5th DCA Judge Orfinger 09/01/2006 **ROBINSON RULE** proving Bar Members and “others” are acting in their Criminal Enterprise by “fraud, collusion and arbitrariness” with intentionally biased “persons” by larceny and frauds under the color of law by bias of Chapin’s alleged esteemed wife Linda Chapin able Quid Pro Quo to reward Orlando Judges and Bar Members the Chapins admitted were their Biased friends and co-participants in multiple criminal acts now exposed.

133. Linda Chapin at the time as Orange County Commission Chairwoman, and other “Court and Government Persons”(Linda Chapin ET AL) as Orange County Chief Judge Rom Powell and “others” through and including this 5/26/2011, Jackson, Grate and Jenkins as agents of F.S.C.T., Berry and Harkness ET AL, Ruling blocking Townsends 1987-now demand for discovery and a jury trial, for self dealing expecting to receive Quid Pro Quo restitution still to this day by Extrinsic Frauds blocking “discovery of truthful records” (Sabal, FBCCP, Sunbelt, KMART and “other”) to vindicate Townsend as Townsend timely alleges per R.O.C.P. 1.530.

134. The **FLORIDA BAR MEMORANDUM** of Cathy Cline to Assistant Staff Counsel Mr. John B. Root, Jr. of July 22, 1993 for cases 93-31, 690,691 and 692) shows most negligence and Torts known at that time in the Criminal Enterprise and now admitted by the courts and Judge Orfinger, Lawrence and Sawaya and Chief Judge Charles Canady and proved, yet they in collusion fail to do “Honest Services” and rather conspire to obstruct justice and aid and abet additional criminal activities.

135. Townsends Letters of March 20, 1994, and April 12, 1994 and other verbal communications to Attorney Mr. Lawrence James Phalin, as the Designated Reviewer of the Grievance Committee Ninth Judicial Circuit “A” for Chairman Kirk Nathaniel Kirkconnell and meeting with Attorney Wendy Akin further shows the negligence and torts alleged in the Criminal Enterprise of all Defendants and others.

136. Emphasis is added in this report that shows the delay to Townsend to know his rights and or to do his Business Practices causes great distress, damages and defamation.

137. The Florida Bar Members and “other Government Persons” dismiss all allegations by Townsend without informing Townsend other than the anonymous Phone Call from who was later learned was Root and per a non responsive evasive letter of April 13, 1994, from Jan Wichrowski which per the *Robinson Rule* admission in September 1, 2006, shows “fraud, collusion and arbitrariness” motives by Defendants and in their collusion to “impede Sabal Records discovery by Townsend and the clients” and “defame” Townsend as the “fraud in a false public light to his clients, family and others” and “not legally acting” to provide “Honest Services” but at all costs to Tortfully Interfere with Townsend’s Business Relations as the cases progressed through 2/2000 to the U.S. Supreme Court so to conceal the Mens Rea Criminal Enterprise the Bar and “Others” were doing to that point to conceal their conspiracy of Negligence and Torts.

138. Townsend alleges and believes by the conspiracy and torts of Gibbs, Scruggs, Gray’s, Crist ET AL, Bush, Grant, Ober, Bar Officers, Beans, Judges and “others” intentional omission of truthful disclosure, Omission of Due Process, Breach of Contract and Breach of Fiduciary Duties, collusion and frauds even explained by Judge Crenshaw herself per the September 7, 2006, Transcript pages 21 line 6 through page 23, line 13, all

Defendants and “others doe” are connected to these related matters of all Plaintiffs even as FBCCP and “The Body” and his kids still abused, for whom Townsend speaks.

139. Townsend alleges the collusion of defendants to “impede” any lawful position of Townsend is as the same pattern of Linda Chapin and Pat Bean and Jeb Bush, Charlie Crist and Pam Bondi being able to for personal motives use their offices for Prejudicial and Fraudulent self dealing and by Quid Pro Quo reward co-participants.

140. In 1994, The “Sect” with Jeffers, New “Senior pastor Beck” (7/10/1994), Nasworthy, Powell, Leatherman and “others” intentionally began violations of the FBCCP By-Laws and Laws that discovery (when not illegally blocked from the “Body” by deputies Jeffers, Howlett and at a later time HCSO Fraud Detective Smoak and their superior officers and judges) revealed is Mens Rea Derivative Torts and Grand Larceny which included forcing out CPCS School Pastor Dr. John Berry (forced by fraud of the Sect to retire so they could implant Karen Jeffers without approval as had been the common practices of the Body from 1945-1993 to vote after approval of the Nominations Committee for the previous School Principals and others) and Townsend. Further, the Minutes of the “FINANCE COMMITTEE MEETING of May 22, 1994, received May 9, 1995, from Elbert Nasworthy confirmed illegal diversion of funds and violations of: the By-Laws, Members and Frauds that Townsend is still Impeded from performing his Nominations Investigation Duties for the FBCCP Body.

141. As alleged honorable “law enforcers” Townsend fully informed Jeffers, Howlett, Smoak, Corbin, and Gibbs, Grant and all “others” listed as defendants herein And “others” and instead of performing their legal “Honest Services” duty and duty as FBCCP Members discovery shows their Mens Rea Derivative Torts increased the

violations by the “Sect” and “Sect Agents”.

142. After multiple years of “heated” public FBCCP Business Meetings and private confrontations on September 8, 1999, Ethics Supreme Court Member Townsend for All Members “Demanded” to the “Sect” and “Sect Agents” as Townsend still in 2011 states (1) Show me the money; (2) Stop the Building Scheme Frauds; (3) Stop lying to my family, friends and “THE BODY”.

143. From that day and before “Jeffers, Howlett, Corbin, Shumate and Smoak as Law Enforcers ET AL” for defamation to conceal their 1994-then crimes, by false reports, by police car chases, standing on the steps of the church, detaining Townsend on public and private property, trespassing and “false defamation” alleging Townsend was a “liar”, “dangerous with guns”, “suffering from a mental breakdown”, had “molested and abused his own kids” was an “infidel”, was a “Repeat and Domestic Violence Criminal per Federal Law” and thereby while Townsend was at Citrus Park Town Center Mall as a F.S. §493 Officer did abduct the Townsend Children against their “Will” as per the letter of J.G.T on October 20, 1999 and for over 5 days illegally kept their whereabouts unknown and impeded Townsend from his Duties and Children still to this day by their false charges still threatening Townsend to stop his attempts for justice.

144. In October 2001, for continuation of criminal enterprise and other torts the “Sect and Sect Agents” via “bribed agents” Ron Beck ET AL and Karen Harrod Townsend (estranged and mentally deranged wife) for Defendants ET AL being intentionally led by informed Sect Member Hillsborough Sheriff Deputies Howlett and Smoak and Pinellas Deputy Jeffers in collusion with the “Criminal Enterprise” participants Gibbs, Grant, Bush, Crist, Pat Bean, The State Attorney’s Office under Mark Ober and his staff with

Pam Bondi, FDLE, THE FLORIDA BAR MEMBERS, F.S.CT. Judges and their agents, Hillsborough and Pinellas Sheriffs and Deputies and “others” falsely filed case 01-15813, Repeat Violence and 01-15814 Domestic Violence Charges and in April 2002 filed 02-4974 Divorce Charges as for “Defamation”, Fraud, Malicious Prosecution and Extortion and “unlawful abduction of the Townsend children in violation of the legal process of State and Federal Laws” against Townsend individual and his children to “by false light defamation” and as a “threat to Plaintiff” to conceal the criminal acts/omissions by defendants and “others doe” that Townsend for Plaintiffs is investigating for By-Laws violations since the 10/1994 Business Meeting admission of torts by FBCCP Administrator Elbert Nasworthy, the Finance Committee and “others”. 145.Gibbs, Grant, Scruggs and Gray were retained for their Honest Services to Plaintiffs and agreed to report per their Contractual Ethical Duty to Plaintiffs all the deprivations being done to Plaintiffs by all “under color of law persons” and “others”.

146.Townsend for himself acted and acts/omissions for all Plaintiffs at all times and filed: Respondent Answers; “Defendant Sham” Claims; F.S.768 claims; lawsuits to: Internal Affairs (HCSO, Pinellas, FDLE and “others”) and to attorney Scruggs (hired in 2000) and Judge Palomino and “others” including Lane, Popper and Chapin, through to the U.S. Supreme Court and timely filed *Townsend v. Beck ET AL* 02-03812 and other cases timely filed as stated herein and filed Tampa Bar Case 05-3977 after consultation with Florida Bar Officer Ted Littlewood against Multiple Defendants herein with the Florida Bar, Judicial Qualifications Commission and Governor Jeb Bush, and various Law Enforcers and Courts against Florida Bar Members, State and Local Government “Persons” and “others” guilty of multiple contract breaches of: The Florida and Federal

Laws (Civil, Criminal and Tax Laws); and The Florida Bar's Rules; The FBCCP and CPCS Constitution and By-Laws (By-Laws) regarding laws, Rules of Due Process and ethics, which at relevant times even by their own admissions proves ongoing "Fraud, collusion, arbitrariness" and the criminal enterprise of defendants and "others Doe".

147. Just as the pattern of the Orlando Cases being by QUID PRO QUO means intentionally being controlled by Linda Chapin ET AL these related Tampa Cases were controlled by Hillsborough County Attorney and Administrator Pat Bean ET AL intentionally biased serving for her own self dealing motives (Bean terminated by the Hillsborough Board of County Commissioners for Torts the same as Nasworthy and Beck were terminated and would have been fired earlier but for the concealment of FBCCP Records by Jeffers ET AL as Law Enforcers under the directions of Florida Bar Officers, Governors, FDLE, Sheriffs, Attorney General and State Attorney Officers and Pat Bean and "others" directing judges to not expose FBCCP records that would enlighten Plaintiffs of these defendants illegal uses of FBCCP Designated Funds and Plaintiffs property) and the motives of her co-participants to assist in the Criminal Enterprise to all costs "Defame" as CPCS Herman Meister stated February 2002, "We made a pack to deny anything and everything you (Townsend) says" thus allowing the Criminal Acts/omissions and Actors to not be exposed or prosecuted as the F.S.CT. and "others" still conspires for Defendants in 2012 because State Of Florida Officers remain in government positions able to conceal or grant themselves immunity for criminal actions.

148. Townsend alleges that the collusion by Defendants to remove Townsend from his FBCCP investigation of violations of the By-Laws and Laws and defamation to remove Townsend from his children in 1999, was a criminal act as collusion so the Sect and Sect

Agents could by fraud gain the \$3.5 Million Dollar Loan to build the MAC Center on the 18105 Gunn Highway Property that Townsend and others of the Body had per the By-Laws and Florida 617 statues tried to stop as a fraud to citizens who had aligned with all Townsends' legal positions as stated by Margaret Tussing, who opposed the zoning variance and allowed Defendants still fail to perform their Contract Duties and refuse "Due Process" to protect Contract Rights (Constitutional and By-Laws) for all ongoing victims whom Townsend still legally speaks within the Statues of Limitations per Federal Rule 60(b) and Florida Rule 1.540(b) and Rule 1.530 per the intrinsic, extrinsic fraud(s) and fraud in courts and "fraud, collusion and arbitrariness" of Florida Bar Members and others still doing ongoing extortion and other torts denying Plaintiffs Contract, Constitutional and Civil Religious Rights and unlawful grand larceny and taking possession of personal Property and children.

149. These Defendant Government "Persons" and their co-participants act as a "R.I.C.O." Style "Gang" selectively and fraudulently serving their unconstitutional "self-dealing" agenda to conceal their criminal acts/omissions rather than perform their Contract and Fiduciary Obligations under U.S. and Florida Laws to equally and lawfully follow due process of law for honest services by Bar Members and "others" for tax payers. Florida Bar Officers and agents in collusion in this case take property, children and Rights and provide citizen victims no recourse Government Oppression under their State Courts. Per *DEREN v. WILLIAMS* 521 So2d 150, 1988, stating and obtaining the grounds for a Writ of Prohibition to disqualify a judge it is proved herein that each state judge in Florida is and always was per their own knowledge disqualified. Further, Federal Judge Merryday had a duty to disqualify himself per his knowledge and prejudice

gained from the *Aisenberg v. HCSO* case which shows these patterns of criminal acts/omissions by defendants.

150. Courts and these Government Persons and co-participants “impede” and continue to deprive Plaintiffs for whom Townsend speaks using violations of: Federal Rights; “Tort Interference with a Religious Contract”; “Child Interference with custody”; and “Racial Discrimination” and various other violations of law to take Plaintiffs property and Rights. When Townsend refuses: to violate the law; accept a bribe from defendants; compromise an ethical or Religious belief; and or abandon a co-plaintiff; these defendants and others perform more obstruction and extortion now since Popper did his first act of client betrayal in 1988 to conceal his malpractice by delaying and impeding discovery as the Criminal Enterprise is shown that Townsend ET AL still seeks (1) granted discovery of facts/omissions related to a contract (Future/Sabal Joint Venture of August 7, 1987 or Sunbelt Employee or KMART Employee or FBCCP as a member) and nor (2) legally removed by Due Process from his Contract Duties, Rights or Membership or removed from his F.S. 617 Fiduciary Duty or as a parent as Townsend still seeks “truthful Sabal, Sunbelt, KMART and FBCCP and other records” and still as a member is investigating “Church sect” violations of the By-Laws and is informed and believes and on the basis of such information and belief alleges all facts/omissions below that each of the defendants at all material times was an agent, servant, employee, Officer, co-conspirator, of the criminal enterprise and civil conspiracy under color of law of the Florida Bar and its agents and State of Florida Agents and “others”.

151. The February 1992, American Bar Association’s McKay Commission issued a report as *Lawyer Regulation for a New Century: Report of the Commission on Evaluation*

of Disciplinary Enforcement (McKay) is co authored by John Berry. This Berry (McKay) report reveals a plot for a criminal enterprise of or by flawed and prejudiced disciplinary process as these case files since July 5, 1988, reveal. Clients funds, State and Federal Funds from Tax Payers and Interest on Lawyers Trust Fund Accounts (I.O.L.T.A) and Court Fees and Church Members Funds and property have been used in this case in violation of Florida Constitution Article I. Section 3., by these Defendants and “others”. The U.S. Supreme Court unanimously held in **Keller v. State Bar of California.**

152. Both The United States Constitution, Florida Constitution and FBCCP By-Laws protect citizens from fraud(s), larceny and their rights of “due process”, equal protection and or of Religion, Assembly, Speech, Vote, Family Child/Parent Rights, Business Rights and Free from Racial Bias or Prejudice as “No law shall impede the obligation of a contract.”

153. In collusion, “Government Persons” and “others” refuse since 09/08/1999 and before to follow F.S.§914.24 process to stop “Harassment” against Townsend ET AL because Townsend reports illegal felony and misdemeanor acts/omissions and seeks “discovery of Truthful Business Records (Sabal, FBCCP, Sunbelt, KMART and others)” exposing “unjust enrichment”, frauds and “thefts” against those for whom Townsend by contracts/omissions speaks. By unconstitutional purposes and fraudulent means these “Government Persons” and “others Doe” use the 1980 Law stated in **Jenkins v. State** 385 So2d1356 (Fla.1980) allegedly for fraudulent purposes to state “citizens” now these for whom Townsend speaks knowingly and willfully gave up their Right to Redress Government Deprivations of cases involving “Frauds as Intrinsic, Extrinsic and Frauds in and by the Government and Agents in Court” as collusion using a “Per Curium

Affirmed” on a decision of a lower judge with lawyers and Florida Bar Agents proved to be in “Fraud, Collusion, and Arbitrariness” to do violation of Due Process Rights herein as a concealment of the torts by Popper ET AL and thereby creating a R.I.C.O. Criminal Enterprise. This is a Fraud by these Defendant Florida Bar and “Government Agents” to “impede” citizens Due Process of Constitutional Rights especially: Redress of Government; Religious Contract Rights; Property Ownership Rights; Eminent Domain Rights; Children/Parent Rights; and Right of a Jury Trial by a person defamed by charges of criminal acts/omissions made by these same “sect government persons and their superior officers” (Government). Defendants ignore and “immune themselves” that even after the **FBCCP Church Members** meeting as a “jury” and at various times receiving information Townsend exposed and posted on www.Judgeoneyourself.com, the Church jury “terminated” “clergy/pastors Nasworthy, Brown, Meister and Beck”, employees and “others” for violations of By-Laws and criminal acts/omissions but the “sect deputies and others” impede with fraud and extortion this jury vote on their same conspired deprivation actions in collusion with the “clergy” and “others”. One right of many denied in collusion by these “sect”, “defendants” and “others Doe” is even though The United States Supreme Court has held that in the matter of loss of Parental Rights a Parent may represent him or herself as Pro Se these Defendants and “others Doe” have before and since September 8, 1999, to conspire and conceal exposure by Townsend for himself and for Townsend ET AL (Townsend) of Defendants as “sectarian FBCCP members and non-members and their agents” and “others Doe” self dealing and unjust enrichment by frauds without Constitutional Or FBCCP By-laws Due Process Rights “impeded” and Abused Process of Arrest and Unlawful Detainment and do “Defamation”

and “Malicious Prosecution” of Townsend (confirmed by multiple judges Orders included herein to show the criminal enterprise admitted pattern) from: his “True Public Light”; his Rights; and FBCCP Duties even to his own family, children and FBCCP Members and “others” including these “alleged” honorable government courts even “impeding and detaining” the FBCCP Members in our “By-Laws Due Process” dealing with “unruly members”, “fraudulent sect members” and “non-members” under Florida Law.

154. Per F.S. Corporations “Not for Profit” §617.0285, these “alleged honorable sectarian law enforcers” Under Color of Law are Estopped per their Oaths and are without standing to be members and or in their “alleged superior government persons” and or per the FBCCP By-Laws is any member or “other person(s)” allowed to “impede”, “Detain”, “defame” or “fraud” per the FBCCP By-Laws, the FBCCP Corporation or FBCCP Members have without “due process” being properly “elected by the members” per the violations to the By-Laws have to members: (I) Omitted truthful disclosure; (II) Produced fraudulent documents; (III) Obstructed “THE BODY’S” Assembly for Worship, Christian School Functions and Corporation Business Meeting and Review of Truthful Documents and Child/Parent daily relationships and visitations and Obstructed and threatened Employment; (IV) Obstructed Members Speech and Speech with “Representatives”; (V) Taken Corporation, Members and Tax Payers property for their self-dealing by unjust enrichment and by fraud created “debt” for the Corporation and Members; (VI) Caused Child endangerment and neglect and abuse; (VII) Dismissed, extorted and threatened Legal Members by violations: of By-Laws Process; frauds; “false light”; “illegal detainment”; and in addition to these obstructions against members these

“Government Persons” have “intentionally, knowingly, willingly and recklessly” with their “Superior Officers” “Under Color of Law” by intentional frauds have: (1) omitted truthful disclosure of “Quid Pro Quo” payments and use by “sect members” of FBCCPCPCS Designated Funds and Donations and Eminent Domain and “other” Tax Payers Funds and property; (2) obstructed “truthful business records production” and “other” required discovery of these related “persons” and “government persons” connecting “Quid Pro Quo” unjust enrichment with FBCCP Property; FBCCP Contracts/omissions with Lawyers and “Government Agents” paid Fees or other exchanges of Members funds; uses of Interest on Lawyers Trust Accounts (I.O.L.T.A.) Funds; Florida Bar “internal” operating and disciplinary records; Florida Lawyers Mutual Insurance Company (FLMIC) members and Operating Quid Pro Quo Funds; State Officers, County Officers and Agents fraudulent uses of Tax Payer funds for unauthorized fraudulent purposes and Quid Pro Quo Services against Appellants using our own property (kids, wife, others and funds) against us (3) obstructed children/parental rights of assembly, speech and vote even in a Church as members by use of their “Law Enforcer” status to do police car chases, “block entrance to the members Church/School property”, file and affirm known “Sham and false criminal charges in court(s) and to other fellow Law enforcers”; (4) Intentionally caused defamation, Business Commerce, property loss and debts and severe emotional distress by frauds Under Color of Law (5) used a willful, informed (legally and timely by certified mail in 2000) Dr. Lon Lynn and his wife Gayle, as the CPCS Dean Of Students to provide fraud, medical care, government assistance and extortion to J.D.T and J.G.T and Karen Harrod Townsend at the direct objection of Randall Townsend and

“competent” medical doctors and Psychologists and “Others”.

155. All defendants are connected in the “sect” “fraud, collusion and arbitrariness” by the intentional “ineffective counsel” of Attorney David Gibbs III (Gibbs) of the Christian Law Association (CLA) with an attorney/client Fiduciary Duty to Townsend since about 1991 and since to all Plaintiffs for whom Townsend speaks even as per his “Contract for Services” as attorney for members and for the FBCCP/CPCS Corporation “Not for Profit” at all relevant times and per his: collusion and violations of the FBCCP By-Laws with the “sect” and “sect agents” against the FBCCP Corporation “Not for Profit” and members; “practices inconsistent with public morals”; “arbitrariness”; intentional and direct breach of Fiduciary Duty and “due process” and honest practices and disclosure; also as an Officer of the Florida Supreme Court and Florida Bar and per his Contract for Services violations in direct and indirect collusion with co-defendants: Tim Jeffers ET AL and Karen Jeffers ET AL; Mike Smoak ET AL; John Grant Jr. ET AL; Jeb Bush ET AL; Charlie Crist ET AL; Bruce Chapin ET AL; Judge Powell ET AL; The Florida Bar ET AL and agents John Harkness ET AL and John Berry ET AL; Judge Crenshaw and “other named judges of the 13th Circuit Court; Dickinson & Gibbons ET AL; Charles Denny IV ET AL and all co-defendants and “others Doe” not yet revealed because of intentional and admitted Intrinsic and Extrinsic Fraud by Co-participants to “impede” discovery of true records as Judge Orfinger and Other judges stated in **ROBINSON**.

156. Townsend as Townsend et al and “others” consulted with Attorney Gibbs personally and as the Christian Law Association agent multiple times since about 1991 regarding various **Townsend v. Lane** *id.* and **FBCCP/CPCS** issues related to the facts/omissions in this case and Gibbs stated he knew Townsend and various other

members to be a person of high integrity and lawful per his positions per the law. Gibbs knew Townsend was hand picked by retiring Senior Pastor Dr. Harold Warner and “others” and elected 100% by the FBCCP membership to carry out the “FBCCP Missions Quest” for Growth since 1993. Gibbs ET AL per a Fiduciary Duty counseled Townsend at multiple times of the criminal acts/omissions , By-Laws violations and violations of Rules of Due Process but with “discovery” now in a “public light” facts/omissions shows Gibbs willful “fraud, collusion and arbitrariness” in collusion with and for defendants and “others Doe”. Gibbs ET AL via Agent Drew Gardner did illegally betray and fraud Plaintiffs and did illegally serve only the “Sect” and “Sect Agents” and himself when Townsend per the CPCS Student/Parent School Contract sought legal FBCCP process for Plaintiffs but is impeded by the Jeffers ET AL Sect as unknowingly joined at the time by HCSO Fraud Detective Mike Smoak acting per HCSO Gary Terry and Deputy Renato Martinez as confessed 6/26/2007 acting illegally for his self dealing of getting a free private education for his children and a job for his wife as a CPCS teacher and thus the HCSO Fraud Department was restructured.

157. Additionally, Gibbs in collusion with John Grant as: FBCCP Registered Agent; Florida Senator and Lawyer conspires with themselves and “other co-participants” since about 1991 to “impede” and “provide ineffective counsel” and Breach of Fiduciary Duties and Contracts/omissions to Plaintiffs. Specific Acts/omissions , conversations and multiple E-Mails of John Grant specifically connect (1) violations of: Federal and State law; Torts to the FBCCP By-laws and those for whom Townsend speaks; (2) and the “government persons and others” connected to the deprivations and violations of Civil Rights done this May 26, and May 27, 2011, and ongoing against those for whom

Townsend speaks.

158. Plaintiffs show these facts/omissions and are prepared to argue the:

“Florida Statutes 617.0834 infers 1. the violations of “Criminal Laws” “estops that officer or director from contesting the fact that his or her breach, or failure to perform, constitutes a violation of the criminal law...” “2. A transaction from which the officer or director derived an improper personal benefit, either directly or indirectly” or 3. “Recklessness or an act or omission which was committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.” Are grounds for investigation and potential criminal or civil charges for violations of Criminal laws or the BY-LAWS.” PER Wests F.S.A. §95.031, LIMITATIONS OF ACTIONS ¶ 43

“A statute of limitations runs from the time the cause of action accrues which, in turn, is generally determined by the date when the last element constituting the cause of action occurs.”

159. Now with Florida Supreme Court Judge Canady per his Order recusing the entire 2nd DCA including himself and naming of 5th DCA judges Orfinger, Palmer and Evander the direct collusion of bias and prejudice and collusion to violate “Due Process” is shown as follows: Robinson v. Weiland ET AL 5D05-2380 (judge Sawaya, Orfinger, Lawson) just found April 19, 2011, is stating TOWNSEND V. LANE 659 SO2d 720 (Fla. 5th DCA 1995) and seven other cases is used as an example of judicial error of the lower court stating:

“Where the moving party’s allegations raise a colorable entitlement to rule 1.540(b)(3) relief, a formal evidentiary hearing on the motion, as well as permissible discovery prior to the hearing, is required. Moreover, the courts have held that the hearing requirement applies when fraud is asserted as a grounds for relief under either rule 1.530 or 1.540, Florida Rules of Civil Procedure.”

Therefore, as done in not Ordering Production of the Lane/Sabal records which when was partly exposed showed the collusion and malfeasance of Popper/Lane ET AL and in the same pattern to not allow discovery of the true FBCCP records by “non-member Deputies as law enforcer agents of the courts and then not conduct an

evidentiary hearing on the issues of fraud of “robbers” of Robinson as now alleged to be done by these attorneys sued as Chapin, Popper, Scruggs, Grant, Gibbs, Gardner, Denny, Rolfe and “others Doe” as Gray’s fraudulent and negligent actions per her contract was to prosecute against “Robinson Types” for Townsend ET AL. the Mens Rea criminal enterprise or “arbitrariness” of each defendant and “others” Townsend sues is to conspire to do intrinsic fraud and by extrinsic frauds prevent Townsend from even having an “honest day in court” since the intentional negligence to conceal the financial damages to Townsend in his business practices in 1988 as Malpractice of Attorney David H. Popper. 160. The “ineffective counsel” started and was affirmed by Popper himself; the law firm of Austin, Lawrence and Landis P.A. employing Popper before Popper joined Chapin; Bruce Chapin as partner and employer of Popper at the law firm of O’Neil, Chapin, ET AL; The Florida Bar Officers even stating:

“This is the worse case of abuse by an attorney on a client in my over 27 years investigating cases for the Florida Bar but my boss has told me to close this file and never talk to you again. Good Bye!”;

Attorney David Gibbs, III; Former Judge and Attorney Charles Scruggs; In part in 2007 by Federal Judge James Moody; the 11th Circuit Court of Appeals in their ruling in TOWNSEND ET AL v. BECK (including Gray) ET AL case 08-10721 of October 6, 2008, as on records filed with this case January 3, 2011 and per the September 7, 2006, Transcript of the hearing of Judge Crenshaw clearly laid out the criminal enterprise when judges Cook and her superiors ignored “due process” and obstructed review by judicial notice of related cases; Disbarred Attorney Heather Gray and “others” with now this ROBINSON case position showing these attorneys and “others” now admitting to their own ineffective counsel or outright “Frauds”, since Townsend v. Lane is the example of

conspired: “law enforcers”; “government officials”; judicial and lawyer errors of the lower court and as the statute of limitations and related frauds in Intrinsic, Extrinsic and Frauds on the Courts per Rules R.O.C.P 1.53 and 1.540 did not expire during the contract for representations these attorneys as were to perform as the cases states “within their scopes” and not by “ineffective” or fraudulent services. In proved conspiracy of their criminal enterprise these Co-Participants have “unlawfully impeded” Townsend and Townsend ET AL from a jury in a court and even in his own Church Body performing the Fiduciary duties of the FBCCP By-Laws these victim members and Corporation expects him to honorably serve.

161. Plaintiffs allege Defendants as Law Enforcers or How will any honorable court ignore bias and prejudicial motives to not be evident of fraud and conspiring motives in this ORFINGER ruling even reversing himself to now deprive and defame himself of honor and integrity on the Bench. Now for the 5th D.C.A. to conspire at the directive of Florida Supreme Court Chief Judge Charles Canady and repeat its proved “negligent” use of the P.C.A. as ROBINSON states to not allow an evidentiary hearing and discovery as stated is required in the Robinson 5th DCA ruling is proof of conspiracy by this court and “others” as Judge Powell, Stroker, Strickland, 5th DCA Harris, Peterson and Thompson; Clerks of Courts; 13th Circuit Judges Palomino, Arnold, Timmerman, Crenshaw, Gomez, Sierra, Holder, Stoddard, Barbas, or as Judge Cook ET AL as “agents” of Hillsborough County Administrator and Attorney now fired Pat Bean, the County Attorney Renee Lee now fired, the Hillsborough County Commissioners and State Attorney Mark Ober ET AL including now A.G. Pam Bondi or as Judge Canady acknowledged by recusing the entire 2DCA did not follow the prescient ruling of even as Judge Orfinger or the Florida

Supreme Court having disbarred Heather Gray per the numerous proofs of frauds to clients even by this 5TH DCA or allow discovery so more frauds of defendants could be exposed and brought into the case Gray was paid and agreed to appeal as reported in Florida Bar Complaint 05-3977, signed for and received by Certified Mail on 11/21/2005 by Jane Cristy of the Tampa Florida Bar Office filed per the Legal Process Directive of Florida Bar Officer Ted Littlewood.

162. This same Florida Bar Complaint was per Certified Mail signed for the Judicial Qualification Commission Brooke S. Kennerly Executive Director on 11/28/2005 and for Governor Jeb Bush per his assigned agent Raquel Rodriguez as General Counsel of Legal Affairs. Each acknowledged receipt of the detailed package with exhibits and the Florida Bar admitted December 2005 “We threw it in the trash!”

163. Even judge Cook in her 09/2009 hearing admitted on the record she had to obey the Orders and Rules of her Superiors. It is clear now she is not obeying the written records or Orders of May 10, 2006 of Judge Crenshaw, the 11th Circuit Court of Appeals of October 6, 2008, and the “Report of the Referee” of the Florida Bar to Disbar Gray in July 2009 and the Order by the Florida Supreme Court Disbarring Heather Gray all within the knowledge of judge Cook prior to her January 22, 2010 Order of Dismissal With Prejudice of Townsend ET AL v. Gray ET AL 06-6005 but the unwritten or not yet exposed Orders of her Co-Conspirators by her dismissal of the 06-6005 case and ignoring that Gray is in Default and that Gray ET AL did not or still has not responded legally per the Rule of Law or per the fact that she was disbarred at the time of filing the Motion to Dismiss on which Cook ruled and now this Orfinger court has upheld and tried to show honor to a fraud against Appellants/Respondents/Ongoing Victims of Popper ET AL and

or related conspiring Deputies Jeffers ET AL as admitted by Judge Crenshaw in 2006 even rewriting the Malicious Prosecution Count given to judge Cook and also as per judge Crenshaw saying “Shut up. I am trying to get you a lot of money and you can go after the others later.” Townsend refused this Townsend believes illegal “Crenshaw ET AL offer” and refuses to “sell out those for whom he still speaks” in this case that has yet since judge Bernard Muszynski in about 1988-1989, to be before an honorable or purely neutral judge. Nor can a case proceed until “Robinson” Type “Discovery” is granted.

164. Even in the record is the fact that the 11/12/2001 letter to Attorney Scruggs from Townsend demanding discovery of records and testimony of the Townsend children would be gained and used in the court of judge Palomino on 11/15/2001 in the “sham” cases of Beck v. Townsend 01-15813 Repeat Violence and Karen Harrod Townsend v. Townsend 01-15814, Domestic Violence being ignored goes to motives, collusion and the criminal enterprise of Defendants ET AL and “others Doe” as Grant, Gee and Ober ET AL on 3/31/2010 per their “e-mail” conspired to send HCSO deputies to threaten Townsend at his Sarasota Residence to stop filing legal papers and stop trying to see your kids as these threats are in direct violations and crimes as per the Ruling of HCSO Sheriff Gee against Sarasota Police Chief Peter Abbott and his officers threatening a witness of a criminal act of abuse by his police officer the same as Gee ET AL has done.

165. On April 1, 2010, Townsend reported these 3/31/2010, acts/omissions “collusion” and “threats” (Acts/omissions the HCSO per their report on Sarasota Police Chief Abbot were illegal abuse) as again part of the “Criminal Enterprise” since 1988 to FDLE Tampa Agent Burke and “others” investigating the charges as Townsend alleges against Hillsborough County Government Persons including Pat Bean, Renee Lee and Jim

Norman and “others” was related per the admissions of FDLE Orlando agents met with and informed herein as “Doe” and “others”.

166. Many other exhibits of “Intentionally and knowingly” written false promises and “threats” of Defendants is throughout the court records in this case.

167. Even the filing by Attorney Scruggs on 3/25/2003, PETITIONER/HUSBAND’S Verified Motion to Disqualify Judge Timmerman in the Divorce case 02-4974 and part of the conspired master plan approved by retained March 14, 2003 Attorney Gray was by Rule of Law ignored and “Under Color of Law” used by Defendants and “others doe” to cause fraud to Plaintiffs and fraud on an Honorable Court as a FBCCP Body Jury has spoken or tried to speak but for the extortion of Government Jeffers ET AL.

168. No judge in these related cases has Granted the 1000 plus legal demands by Townsend for “Full Discovery” of even his own records by Sabal, FBCCP Contracts/omissions , and Kmart Contract or even allowed Townsend as a victim Respondent since 1988 from false charges Lane ET AL or Jeffers ET AL since 09/08/1999 to freely even talk to or to defend himself as a Respondent from “sham” charges as “dangerous with guns” or an “infidel” and “liar” or even take the testimony of his own children on or for the record since 10/20/1999 so to disprove the intentionally false “abuse(s), molestation(s) and fraud(s)” charges made by admitted criminals as the Ex-wife, “alleged honorable pastors Nasworthy, Beck, Meister and Brown” and “Sect agents” and “alleged by only themselves honorable alias government law enforcers”.

169. Scruggs since 2000, intentionally omitting truthful disclosure and failing to provide honest services withheld his Quid Pro Quo conflict of interest being paid by Hillsborough

County Administrators and County Commissioners under the Supervision of Pat Bean and Jim Norman whom Scruggs per his duty to Plaintiffs was required to expose of their criminal acts/omissions to conspire with the HCSO, the FBCCP Sect and “others”.

170.Gray at or about the time of her representation of Townsend ET AL and knowing of Townsend’s allegations against Charlie Crist as Attorney General and Governor and “others” in his “gang” is employed (Quid Pro Quo)to report and represent cases on behalf of defendants herein as a major conflict of interest and argued many other cases even to these judges of this 5TH DCA and 2nd DCA who brought charges against her in her Florida Bar Investigation and Disbarment by the Supreme Court.

171.Plaintiffs allege QUID PRO QUO MOTIVES OF BIAS AND OR PREJUDICE AND NEGLECT OF DUTY ISSUES SHOW THE COURTS ARE IN CONTINUING VIOLATIONS OF: “RULE 2.085 TIME STANDARDS FOR TRIAL AND APPELLATE COURTS (a) Purpose. Judges and lawyers have a professional obligation to conclude litigation as soon as it is reasonable and justly possible to do so....(d) Time Standards...(B) Jury Cases---18 months (filing to final disposition)...(C) Domestic Relations... Contested 180 days (filing to final disposition)...”.

169. In each of these underlying causes now enjoined these judges and others of alleged honorable “law enforcement” ignore the ongoing criminal acts/omissions , violations of Rules of Law and legal Orders of their Superiors, Constitutional violations and damages still being caused against Respondent/Appellants by Plaintiff/Defendants even as this ROBINSON Orfinger ruling shows judicial misconduct and the conspiracy since intentionally ineffective counsel Popper and Popper ET AL began to conspire to “never let Townsend have discovery or his day in court” since about 1988 just as Gibbs

ET AL does in collusion with Popper/Chapin ET AL and Dickinson & Gibbons ET AL and Scruggs/Gray ET AL all being aided and abetted by Harkness, Berry and the F.S.ct.

170. RULE 8.00 FLORIDA RULES OF JUVENILE PROCEDURE and specifically F.S. §39.01 (1)-(57) were and are “impeded” since on or about 1997 by the Ex-wife and her Employer FBCCP Sect Supervisors and other Co-Participants and “others Doe” herein as Defendants who still conspire by “THREATS and OBSTRUCTION” by “Government Persons” on the FBCCP/CPCS kids and those for whom Townsend speaks to conceal frauds at Law and Facts/omissions and violations of the FBCCP By-Laws by Defendants. Since the “ineffective counsel” started by Popper ET AL began in about 1988, these Children for whom Townsend speaks have been detained “KOLB” style by “Government Persons” directly connected as judge Crenshaw said “all things are related” by Popper, Chapin, Bush, Crist, Gibbs, Jeffers and Jeffers Deputies ET AL, Scruggs, Gray ET AL and “others Doe” and deprived of F.S. §39.071 (Right to Counsel) other than the now proved F.S.617 honorable counsel Townsend proved and advocates.

171. RULE §90.501 EVIDENCE CODE 90.502 in whole and specifically “Subsection (4) (a) When the services of the attorney are sought to be utilized in the commission of a crime or fraud, the privilege does not attach...”

172. TO THE POINT OF “MOTIVE OF THE CONSPIRACY”, THE PATTERN OF NO DISCOVERY IS THE SAME IN TOWNSEND v. LANE and BECK ET AL v. TOWNSEND now consolidated in this case as TOWNSEND ET AL v. GRAY ET AL. allowing Townsend and those for whom he per F.S.617 speaks to prove the Truth or innocence of charges made by Government Agents of Popper ET AL or Jeffers ET AL. No Lane a/k/a Sabal business records were produced. Also NO FBCCP or CPCS

Business Reports produced by Order of Judge Crenshaw showed were in matter of CLA Gibbs or Gardner or FBCCP Registered Agent Florida Senator John Grant or attorneys for Dickinson and Gibbons as Charles Denny ET AL or “others” not legally per the Rules of Civil Procedure documented in the court as Townsend demanded from Denny ET AL in the Court of judge Crenshaw 09/2007, “who are you representing and who is paying you and show me more records that you are unlawfully withholding from the Church Members as even my kids you even by frauds claim to speak or represent.”, as it is not per the will of the FBCCP Corporation or the Church members opposing allegedly “Government” Jeffers BECK ET AL right to do fraud of members and students and or the FBCCP Corporation. Rule 90.502(4)(a) crime, fraud (c) breach of duty “In *Kneale v. Williams* 158 Fla. 811, 818, 30 So2d 284, 287 (1947) the Supreme Court stated: It appears to be well settled that the perpetration of a fraud is outside the scope of the professional duty of an attorney and no privileges attach to a communication and transaction between an attorney and client with respect to transactions constituting the making of a false claim or the perpetration of a fraud....”. Therefore, just as *ROBINSON* **id. states Judges Rom Powell, Stroker and “others” including as more concealed evidence will prove and Popper and Chapin were conspiring against Townsend in the underlying cause Scruggs and Gray was to litigate so shows the FBCCP Corporation lawyers (Gibbs, Grant, Dickinson and Gibbons, Rolfes, Denny and “Others Doe”) and or as Deputies ET AL as Government Officers have no right to “impede” or “withhold evidence” or “obstruct” evidence nor does the “judge” or “deputies ET AL” as Government have the right per the FBCCP By-laws to “impede”, “detain” and or “fraud” a Church members duty, assembly, family/parent/children actions, action, knowledge,**

and or vote as this is a specific Tort and Breach of the FBCCP By-Laws.

173. Rule F.S. §38.02 states: “If the judge finds that the suggestion is true, he shall forthwith enter an order reciting the ground of his disqualification and declaring himself disqualified in the cause: if he finds that the suggestion is false, he shall forthwith enter his order so reciting and declaring himself to be qualified in the cause....”. In this case again it is necessary for a judge (Orfinger, Palmer and Evander) to recuse himself and enter an order per the Rule of Law. Proofs of others as judges ignoring this rule goes to motive and conspiracy as that each per the threats of the McKay Plot were known to all.

174. These judges reviewed an incomplete record and even did not take judicial notice or allow time to file papers as Appellees and “others Doe” refuse to file court ordered per Rule of Law papers or responses to deny allegations confirmed by these Appellants.

175. **THEREFORE** FOR THESE ABOVE REASONS AND OTHERS NOT YET DISCOVERED BECAUSE THESE “GOVERNMENT PERSONS” CONSPIRE TO “IMPEDE” DISCOVERY AND PER THE DIRECT REPLY FROM FLORIDA SUPREME COURT CLERK THOMAS D. HALL in his letter of March 4, 2011, cc: Hon. David A. Monaco, Chief Judge, Fifth District Court of Appeal, this Demand for Discovery, Recusal of judges Orfinger, Palmer, Evander and the entire 5th DCA is not generally but specifically made as it appears the Fifth DCA and Other Florida Courts are without quorum of any judges not appointed by Governors Chiles, McKay, Bush or Crist or not under the direct control of Florida Bar officer John Harkness or John Berry, as discovery will show are directly involved in the underlying conspiracy to oppose Townsend having an “honorable day in court” as proof of the criminal enterprise and self preservation and self dealing as demonstrated in the 1992, American Bar Association’s

McKay Commission Report co-authored by John Berry not exposing his patterns of deprivations just as the United States Supreme Court “warned” of the “risk” by his selective powers in overseeing discipline for the Florida Bar.

175. Per Florida Rules of Court Rule 2.050(g) Neglect of Duty this Action is/was forwarded to the Chief Judge of the Florida Supreme Court and to the Office of Governor Rick Scott for their specific functions of their Fiduciary Duty which yet has been done.

176. Townsend as Townsend ET AL after a lengthy consultation retained the services of Attorney Charles H. Scruggs III (Scruggs) in July 2000, also fully informing Scruggs and fully trusted and respected his alleged Christian integrity and superior knowledge and advice as a former Judge retained until September 30, 2003. Scruggs in July 2000, stated legal issues and said all Townsend could do at that time was write letters as was done to the Beck “Sect” known at that time and keep doing what he had been writing through the courts regarding the Popper/Chapin/Florida Bar fraud cases and the pending need for litigation against Sunbelt Equipment Sales for payment of Contract Services and wages.

177. On 09/30/2003, when Townsend ET AL confronted Scruggs with the Malicious Prosecution Claim being approved to proceed by Judge Crenshaw based on the Beck ET AL events Scruggs had handled in 01-15813 and 01-15814 and 02-4974 cases Scruggs being caught in an bold faced lie that Townsend had no recourses for full restoration for himself and for his family and others stated and confessed “My personal convictions do not allow me to make a church look bad” and “I had no intention of bring up the Church issues into the Divorce Case”. The Church issues were a direct “collusion, fraud and arbitrary” connected act of the criminal enterprise Scruggs through his co-participants uses to continue per the directive of co-participants from Popper and Chapin ET AL to

put “Townsend in a false public light”.

178. Scruggs was immediately terminated and Townsend wrote in Divorce case 02-4974, a Motion for Rehearing 10/1/2003, advising Judge Timmerman that Scruggs was “FIRED”! Emphasis added. Despite Scruggs being “FIRED” it is now proved Stoddard, Timmerman, Gray, Scruggs, Gomez, Sierra, HCSO, Bean, Crenshaw with 13th Circuit Judges, F.S.C.T., FDLE, and “others” and Charlie Crist and his Attorney’s Generals Office Agent Lawyer Lori Sellers Rowe and “others” conspiring to keep the “criminal enterprise” working against anything Townsend advocates honorably per the FBCCP By-laws and Constitutional Laws and Kmart Corporate Policies.

179. By the collusion, threats and illegal actions using Racial deprivations and slanders against Townsend by Kmart Store #3092 Pharmacist Dr. Linda Rowe Campbell, her relative, Lawyer Lori Sellers Rowe of the Office of the Florida Attorney General in the roles of Director of Multi-State Litigation, Assistant Deputy Attorney General and Executive Deputy Attorney General from 2003-2006, becoming Governor Charlie Crist’s Deputy Chief of Staff and Barbara Booth, Shane Pearson, Daniel J. Gentile, Doug Livingston, Roy Allen and “Kmart others” claims of “If Townsend beat and molested his wife and children and lied to the church about the money as the Jeffers and others at the Church claim what will Townsend when he explodes, do to us” as the basis of unlawful treatment causing a “bad store moral” and that Townsend somehow by “forgery and records tampering” had gained a “false store inventory” was used as motives to conceal the criminal enterprise and proved thefts and violations of Kmart Policies of Kmart defendants by all defendants to “terminate” and defame Townsend in a false public light and to reduce Townsend’s income to litigate this case and as extortion to not present

violations of Federal and State Laws by Defendants.

180. Townsend as Townsend ET AL retained the services of attorney Heather Mary Ann Gray at the directive of Scruggs on March 14, 2003, and paid a demanded \$1,000.00 retainer as Gray “angry and appalled” stated that would more than cover her investigation and filing any appeal as she would rely on Scruggs for details to prepare the Divorce Appeal and or Writs to include the details of the deprivations and damages of all the underlying Lane/Popper/Chapin/Williams/FBCCP/Sunbelt cases.

181. Judge Padgett sitting in for judge Cook in August 2009, as had judge Gomez twice and the Clerk of the Courts, stated Gray was in “Default” but recused himself as had Judge Gomez twice without an Order because he showed he was a disappointed friend of Gray after he read the 06-6005 Complaint and knowing of her disbarment and when she arrived late and said she could not find the courthouse and called Judge Padgett the wrong name.

182. The positions of Gibbs, Scruggs, Gray and the admissions of said malfeasance and collusion with judge Powell and judge Strickland by Popper, Chapin and “others Doe” were confirmed by judge Crenshaw and judge Orfinger during 9/1-7/2006.

183. Townsend as Townsend ET AL stated to Judge Cook in 09/2009, this all began when Townsend per his duty to the Church confronted the “sect”.

184. With that Judge Cook stopped the hearing to shut down plaintiffs arguments and the 06-6005 timely filed case and did not allow “discovery” or more supplements to the record that connects the other “government officers” and “others” intrinsic, extrinsic fraud and collusion of fraud in the courts so to continue the criminal enterprise and “impede” plaintiffs Civil Rights per their Contracts/omissions .

185. The Florida Bar reported to the Florida Supreme Court and signed by Heather M. Gray Respondent on 12/10/09:

“¶ 7. Respondent asserts ...admits that during the relevant time period, she was suffering from significant mental health issues...

¶ 8. In July 2009, Respondent voluntarily elected to be placed on inactive membership status with the Florida Bar. ¶9. Respondent admits that as a result of her conduct and by reason of the foregoing she has violated the following Rules Regulating The Florida Bar:...”.

186. Plaintiffs asserts disagreement with The Florida Bars claim now of start “relevant time period” as the same charges Gray admitted to the Florida Supreme Court were the same charges this 2DCA admonished and denied Gray multiple times for in the Townsend Divorce case 02-4074 and Appeal 2D03-5679, Gray handled allegedly by all defendants even The Florida Bar “properly” for Plaintiffs her former clients. The Florida Bar, Jane Christy admitted in 12/2005, The Florida Bar Complaint #05-3799, against now defendants was “thrown in the trash”. Yet now The Florida Bar, Gray and the Florida Supreme Court confirms Townsend allegations of the starting of these same patterns from 2003, so how does judge Cook or this lower 2DCA say otherwise. If in July 2009, Gray went “inactive” then her July 2009 and other filings to judge Cook show: a fraud to the Courts including judge Cook and the Florida Supreme Court; proof of another violation of Rule 4-3.3 (Candor Toward the Tribunal) and Rule 4-8© (conduct involving dishonesty, fraud, deceit, or misrepresentation); is a proof her filings to judge Cook could not happen as a matter of law; and therefore shows her in default as Townsend alleged and shows the bias and prejudice of judge Cook to assist defendants in total disregard for the Supreme Court ruling her “inactive” or for the law.

187. Judge Frank Gomez, after intentionally causing delay in Divorce case 02-4974 and Townsend ET AL v. Gary ET AL 06-6005 and omissions of truthful disclosure

resigned from this related matters case twice (2004 and 2007) knowing and admitting to the acts/omissions of criminal enterprise he willfully aided and abetted to which Gray now admits.

188.Criminal Motives and proofs of the “self dealings” of each defendant can be presented for trial and defendants know Townsend knows what to show a jury and even his church members jury but “law enforcers” still attempt to arrest Townsend for any charge they can create as the HCSO deputies in March 2010 warned. The trespass warning 07-650170 issued 10/28/2007 by HCSO per the call of the “sect” at the FBCCP worship service because Townsend was just sitting on the back row shows the public what Jeffers “sect” said they would do since 09/08/1999 because of the “Demand Meeting” of “Show me the money and stop the building scheme frauds”. Now we have proofs the “self dealing” payments, money and teaching jobs and free private school education for the Jeffers, Smoaks, Becks and “others doe” was a financial and power, greed motive to deprive Plaintiffs of their property and Rights. We also now have proof by the 18105 Gunn Highway property going up for sale and the years of wasted litigation trying to get permits for new zoning have proved a fraud as Townsend advised in 1997, “Do not buy the Earle property”.

189.In 1997, Townsend and the Property Acquisition Committee and the members did not approve the purchase of the property unless we got the permits first. Beck and his “sect” deceived the membership and bought the property as the contracts/omissions show in contrast to the vote of the membership. By this 1997 vote, the “sect” with Jeffers Deputies ET AL was already to deep in conspiracy to stop Beck bragging that “he wanted up to \$40,000 to remodel the home, so he could have more bathrooms for his

daughters and a pool and live in the country like his brother Donnie.” The “sect” abused Townsends kids and Church members for “bathrooms” and defendants and “others” do not call them as the same criminal acts/omissions as John Couey or Bernie Madoff when they still in March 2010, and again May 27, 2011, threaten Townsend and as a symbol to others to drop this lawsuit and do not try to contact or inform Townsend’s kids of their legal rights.

190. Judges for the same acts/omissions as stated herein by Defendants and “others doe” put others in jail for life and tried to restore victims but these defendants do these intentional (too many to list in this limited brief) crimes of abductions to kids in what is to be a safe Church School “NOT for profit”. Besides what they take from the “Not For Profit” these government officers take our tax payers money and use that against us also to promote and conceal their other criminal acts/omissions “under the color of law” as they grant themselves immunity from prosecution because the Governors (Chiles/McKay/Bush/Crist/Scott), Attorney General (Crist, Butterworth, McCollum, Bondi), Harkness, Berry and the Sheriffs (Gee, White, Coats with Col. Gary Terry, Santa Rosa County Employees) and FDLE control and trained the “law enforcers” non prosecution and leverage the courts in any civil matters or prohibit Townsend from speaking to his fellow members in church.

191. For the issues relating to the Governors (Bush/McKay) race this is what Charlie Crist did when Plaintiffs allege he intentionally did not give the Loyalty Oaths to the Florida Supreme Court Judges (Quince, Anstead, Wells, Pariente, Cantero, Bell, Lewis) but Butterworth did in October 2007.

192. The information Jeb Bush privately got beginning at the Tampa Channel 13

Televised Town Hall Meeting and thereafter on the criminal acts/omissions of attorney Bruce Chapin done with Linda Chapin and the Orange County judges and Florida Bar Officers gave Jeb Bush (as he admitted) with Linda Chapin off the ticket the election as the Orlando Sentinel wrote she controlled the I-4 Corridor voter who then turned to Bush. 193. Townsend alleges the Florida Supreme Court Judges thus had motive to call multiple times the Presidential Election for Gore verses Bush because of bias about the motives of Jeb Bush, Charlie Crist, Harkness and Berry and “others”.

194. **WHEREAS PER THE RULES OF LAW and CASE LAWS** even by these same “judges” in **ROBINSON id.** **admitting their own “judicial errors” as part of their criminal enterprise** the Statue Of Limitations has still not expired on any named Defendant or “Others Doe” not yet exposed because even as one example, Judge Orfinger ruled in **ROBINSON id.** “Discovery” has been “Unlawfully Impeded” by judicial “errors” since “Government Persons” as Popper/Chapin/Jeffers/Gibbs ET AL are enjoined as these “partially allowed records exposed” since about 1988 to continue to use their clients funds and “Government Funds” also as Tax Payers funds by frauds as “Government” to “Impede” Constitutional and Contract Rights these for whom Townsend speaks advocates as a “Whistle Blower” per F.S.§617 per Florida Constitution Article I. Section 3. Judge Orfinger is per his Rulings now expected to be called as a “Witness” for Plaintiffs per his admissions ruling in **ROBINSON** that prior judges violated Townsend as Townsend told this 5th DCA court since these first related Appeals were filed against **Lane ET AL.** These same Co-Conspirators and Co-Participants are connected to the violations of Law as admitted by Judge Crenshaw and Attorney Denny in September 2006 in the transcript showing their collusion to conceal “truthful evidence”

and not grant Discovery (Even of FBCCP/CPCS Records which when produced will show use of Church Members designated funds instead used by the “Sect ET AL” as Jeffers/Beck/Powell/Leatherman ET AL for “unreported bribes” and payments to with Gibbs/Grant/Denny and “others” ET AL, within the same week of the **ROBINSON** 9/1/2006 ruling and with showing these connected facts/omissions per the Crenshaw allowed filing of the Amended Complaint Townsend filed August 10, 2006 (Crenshaw appointed by Defendants Bush and Crist ET AL have motives of prejudice and bias as confirmed by Judge Canady) in related case 02-03812 as attorneys (Scruggs/Gray/Denny/Rolfes/Grant/Gibbs and “others”) retained by or for the FBCCP Church/School “Not for Profit” Corporation as for Townsend ET AL had a duty to protect F.S.§617 “Persons” as Clients. By Attorney Gibbs/Jeffers(Deputies/Government Law Enforcers) ET AL “obstructing” Townsend and other members by Popper/Gibbs/Jeffers ET AL conspired frauds to produce false records and false Under Color of Law legal advise and even violate Townsend’s Right to per his FBCCP Membership Contract and Duties Address his co-members per the FBCCP Contract these “Law Enforcers” have in conspired collusion per Rule 1.530 illegally violated Florida Statues and our Florida Constitution and our U.S. Constitution.

195.These Townsend ET AL case files since 1987 and before must be included as Evidence showing “collusion and frauds” to violate a “Religious” Protected Group per **FIRST FREE WILL BAP. CH. OF BLOUNTSTOWN, INC. v. FRANKLIN, ET AL.** 4

So2d 390, 148 Fla. 277, stating:

“When membership was accepted therein, they submitted themselves to the ecclesiastical jurisdiction of the church...The law appears to be settled that in the

absence of showing of fraud, collusion or arbitrariness on the part of the church authorities having jurisdiction of the controversy, the courts will not interfere.”

At FBCCP/CPCS the “ecclesiastical jurisdiction” duty rested in the vote of “THE BODY” and Nominations Committee Townsend’s Supreme Court Motions to the membership of which Townsend in or about 1994 began his “Dutiful” investigation of frauds by FBCCP Business Administrators at the directive of the membership and sought the assistance of Deputies and CLA Gibbs and John Grant ET AL to perform their contracted legal duties and FBCCP membership contract duties.

196. The “Frauds and Collusion” by these “Law Enforcers ET AL” is still continuing in violation of law as stated in UMBERGER v. JOHNS 363 So2d 63, 1978 confirming the By-Laws of a Baptist Church must be followed even after these same “Law Enforcers ET AL” have themselves “arrested” the Windermere Police Chief for the same refusal to investigate crimes and even “terminated” Hillsborough County Attorney and Administrator Pat Bean for the same reasons as Nasworthy had done at FBCCP and “sought relief” against many of these now same defendants were or now who still are part of the “Kolb” id. detainment keeping Townsend and Townsend ET AL from his FBCCP Duties, kids, family, business and Constitutional and Contract Rights.

197. Therefore per the law these Courts and or “Others” of “law enforcers” or “Others” cannot continue the violations against the “FREE WILL” Members since the confession of violations by Nasworthy October, 1994 when the “Body” demanded the investigation by Townsend and stoppage of the criminal acts/omissions in violation of the By-Laws orchestrated by non member Deputies Jeffers, Howlett and “others”. Discovery of our FBCCP Business and “other” records must be produced and a “lawful judge” must not impede the FBCCP Contract Rights of the LAWFUL Membership and a “lawful judge”

must “make whole” these Townsend ET AL victims for whom Townsend hereby still speaks since the “unlawful acts/omissions ” by Lane ET AL caused damages since about 1987 as Defendants for their unjust enrichment and frauds violated: **F.S.§775.03**

Unlawful Benefit to Clergy; F.S. 775.085; 775.089; 843.14; 827. Abuse of Children And F.S. §26.49 as Sheriff is Executive Officer of the Court aided and abetted per Pellegrini v. Winter 476 So2d 1363 (Fla.App.5 Dist. 1985).

198.Plaintiffs claim and state Rotella v. Wood 528 U.S.549, 560, 120 S. Ct. 1075, 1083-1084, 145 L.Ed Sd 1047, 1058, R.I.C.O. Bus. Disp. Guide (CCH) P. 9837 (2000).

Premature to dismiss R I.C.O case before evidence can be presented based on anticipated further discovery and investigation.

199.Plaintiffs claim and state: Sedima, S.P.R.L. v. Imres Co., Inc. 741 F. 2d 482, only “requires a Plaintiff to prove a RICO cause of action by a preponderance of the evidence”. And sets a standard that Plaintiffs should not be allowed to decide to pursue less than all parties who commit a crime keeping in line with the Supremacy Clause of the United States Constitution based on contribution and indemnification and Plaintiffs elect not to decide until all discovery is obtained.

200.Plaintiffs did as advised per Judge Arnold, file and serve defendants and consolidate cases and this was done with Lane, Popper Chapin and Williams but blocked by judges thus proving malice and collusion as Robinson shows Powell and others still do.

201.At least at one time or another in these related cases consolidated herein under 06-6005, Townsend ET AL v. Gray ET AL defendants have confessed or met the elements of a pleading of the 5th Amendment as “silence by one under such a fiduciary duty to disclose is fraudulent concealment.” *First Union Bank v. Turney* 824 So2d 172, 189

(Fla. 1st DCA 2001) and per Morgan Stanley DW Inc. v. Halliday 873 So2d 400, (Fla. 4th DCA 2004) “Fiduciaries are generally not able to avoid the negligence performance of their own special responsibility by handing them off to someone else.”

202. Plaintiffs state and claim, based on the findings by the Florida Supreme Court (SC09-112) disbaring Heather Gray it appears Townsend was the first reporting and as victim of the “Scam for the Shams” of intentional acts/omissions of Heather Gray and Heather Gray Et Al. taking money for services not rendered and giving a false hope to clients when the intent of her and her co-participants was to conceal her co-participants malfeasance and criminal acts. Defendants by the 2010-current actions of defendants still refuse to admit Townsend first reported the “shams” and was deprived by Gray ET AL malfeasance.

203. These recent deprivation act(s) by which Judge Cook, Judge Orfinger, Judge Canady, and now as for the Florida Supreme Court by Jackson, Grate and Jenkins on 5/26/2011, as for all defendant(s) still impedes Townsend and victims for whom he Represents from still their Contract and Civil right to redress these Florida government “persons” in a jury trial or in a church jury trial and from his still church and fellow members and family and ongoing fiduciary duty and investigation is a criminal violation and violation of the FBCCP By-Laws and attempt to prove litigation issues in courts estops any and all defendants as they change their positions or grant themselves immunity with what ever new fraud they need to tell as they violate United States Constitution, Federal Laws, Florida Constitution, Florida Laws and the FBCCP By-Laws even after the “clergy” and “others” was exposed and terminated.

204. Plaintiffs showed as these proofs to Defendants who still continue to impede:

- A. “Randall Townsend, because of his FBCCP duties and demands since 1994, and specifically on September 8, 1999, “demand” to “Schism roosters” of “Show me the money” and “Stop the building scheme frauds”, and since October 20, 1999, as a father of J.G.T age 14, and J.D.T. age 16, is still threatened to even not contact his still threatened and kidnapped now adult children due to the illegal fraudulent violations of F.S.§741.30, F.S.§787.03(6)(a), F.S.§787.03(4)(a)-(b), and F.S.§787(6)(b), as the language of the **Amended Final Judgement of Dissolution of Marriage of November 18, 2003**, (herein after as Divorce Injunction of November 2003), as was changed from the verbal court order of January 2003, and the October 31, 2003, **Amended Final Judgement** and specifically Point 6, regarding the sale of the marital home was redone to create financial stress and Point 7. “Both parties shall be enjoined from harassing, molesting, stalking, and bothering the party either directly, indirectly or through any third parties. This injunction shall remain in effect until further order of this court.” This conspiracy is keeping in 2011 and specifically up through May 27, 2011, Townsend from his kids since 10/20/1999, defaming his reputation thus causing his termination of employment’s and done after many drafts not shown to Randall Townsend, still in collusion by the September 30, 2003, fired (announced to Judge Timmerman October 1, 2003, in Townsend’s Pro Se **Motion** to Judge Timmerman showing Court frauds) and the fraud of attorney defendant Scruggs ignoring all his clients (Cannon, Children and Civil) Rights and Florida Family Law Rule 12, Attorney Representation Contract rules, for his personal financial gain as appointed by HCSO and compensated QUID PRO QUO at relevant times through Government Acts/omissions of the Hillsborough County Commissioners under the Legal Directives of Hillsborough County Lawyer and Administrator Pat Bean as a special needs lawyer, in collusion with his now co-defendants and specifically Judges Timmerman, Gomez, Sierra, Arnold, Crenshaw, Holder, Stoddard, Barbas, Cook, Menendez Jr., Appeals Judges and attorney Heather Gray to conceal theirs and HCSO fraudulent acts/omissions still ongoing, even though the children were both already over the age of majority at the time of the conspiracy of the signing of the **Divorce Injunction of November 18, 2003** by defendants and even now after Townsend proving the divorce action was intentionally gained illegally by willful collusion with the Defendant Karen Harrod so discovery of all defendants additional ongoing crimes could not be learned to protect the children from Criminal dangers confirmed by Professional Doctors (Dr. Hoyos, Dr. Milan and “others”) even after confirmed dangers are not from their father, Randall Townsend, but only from their own fraudulent Karen Harrod as mother, her maternal family, “CPCS school employees”, “pastors” and “law enforcers”.
- B. See Townsend Children’s letters below herein. After reading these letters **Scruggs et al.** concealed from the public, let all the ongoing kidnapers be prosecuted to the fullest extent of the law! Emphasis Added!

- C. Randall Townsend as a parent has never been served or found that any required report by F.S.§741.29, was filed by any HCSO officer including **Joe Howlett et al** or **Mike Smoak et al.** or any other officer or any person of the State Attorney's Office or by any law enforcement office. The Affidavits of cases 01-15813 and 01-15814 heard and dismissed by Judge Palomino (11/15/2001) with warning to all defendants to stop Child Interference and Custody with their Father was continued to do all defendants frauds in the **Divorce Injunction of November 2003** was prepared and still is used only to conceal past violations of law and prevent new discovery of violations of law. Per F.S.787.03(3) a retroactive court order may not be used to excuse this 1st and 3rd degree felony done by all defendants which is escalated per F.S.§775.085, since this kidnapping, fraud and detainment of these children both under 17, in 1999, were taken to conceal frauds done per a "religious hate crime" and conspiracy and these acts/omissions show habitual offender violations per F.S.§775.084. HCSO and the State Attorney and "others" still now refuse to accept filed affidavits for criminal felony charges as this will expose their own violations since 1999 and before and the extortion letter written by the kidnapped children J.G.T and J.D.T on October 20, 1999, the day these alleged "Sect" deputies took the law into their own hands to conceal their years of previous violations of Cannons, By-Laws and Civil Law.
- D. Randall Townsend is fully cleared of any wrong doing by Karen Harrod Townsend's affidavit to Judge Holder in 12/2005 and partly cleared of any wrong doing as alleged by Beck and Jeffers et al., but is still "impeded" and "detained" from his FBCCP elected Duty and Right to assist the fellow "Pilgrims" in their "FBCCP Quest" because of the frauds of **Jeffers et al.** so to keep concealed the illegal acts/omissions by "alias law enforcers" began by the conspired frauds of Jeffers ET AL including kidnapping the Townsend kids from this father since October 20, 1999, as witness tampering extortion to obstruct Sovereign Rights as must be honored per **Umberger v. Johns.**"

205. On 10/02/2007, HCSO Sheriff Gee, made at least these fraudulent statements to Townsend to continue the "under color of law deprivations": "All the statute of limitations have expired; HCSO will not step in anymore and try to keep you from your kids."

206. On 10/3/07 and thereafter HCSO, Pinellas S.O., Pasco S.O., FDLE, A.G's, officers and other co-participants were duly informed by Townsend of their criminal enterprise.

207. On 10/28/2007, HCSO Deputy Clark with knowledge and prior instructions of his superior Officers and co-participants per the directive of Tim Jeffers arrived at FBCCP and violated Constitutional and By-Laws Due Process and Rights of a Citizen and

Member and “trespassed” Townsend from “sitting” in the Church where legal records show Townsend and members were violated of Due Process by Under Color of Law and Frauds of the “Sect and Sect Agents” as Townsend was never voted out as a member per the By-Laws and per States Rights of members in a Florida Corporation and or association. The “co-participants” motive still is to conceal ongoing frauds and Sheriff Gee through Gary Terry and others knowingly directs Tort by co-defendants including his Hillsborough Circuit Court Judges as the Sheriff is the Executive Officer of the Court. Bush and Crist have cause to investigate and remove the Sheriff’s but instead in a “special test market” intentionally gave them special DCF powers so to continue ignoring the “child abuse” and “child interference” Townsend continues to learn of and report.

208. Tim Jeffers as at times Finance Committee Chairman now Trustee, admitted 10/28/2007, his “Sect and Sect Agents” Finance Reports since 1994-5 and Building Fund Scheme Reports since 06/1997, through now still are deceptions using masked terms as “Operating Funds” or “Administrative Fees” or just outright “Omissions of Truthful Disclosure”. Tim Jeffers specifically admitted the October 27, 1999, Janssen & Horgan C.P.A Report (a.k.a. Ransom demand letter) and other reports given to the Members in the public Quarterly Business Meeting (but not revealed to Townsend until 2006, because deputies Jeffers, Howlett and Smoak and “others” militia through now still illegally chase Townsend from the Church/School), was intentionally faked to the public so to defame Townsend to look like a “crazy deranged liar” just seven days after they kidnapped innocent kids to conceal their extortion and obstruction. This “ransom letter” is a retaliation to Townsend’s members “Demand Meeting of 09/08/1999”, to the “sect participants” to (1) “Show me the money and (2) Stop the building scheme frauds. The

money facts/omissions trail is still not exposed by “roosters” or “foxy” government agents. The building scheme frauds are violations of FBCCP Members “Votes” and “Quest” now since 1997 and after Judge Arnold and Judge Barton (2006), County Commissioners and Appeals Courts deny the “permits” as Townsend stated would not be approved but had to be defamed during the permit process so the roosters could continue frauds since 1997.

209.The October 28, 2007, FBCCP Business Quarterly Meeting Handout continues the fraudulent language of the Criminal Enterprise using terms as “Operating Costs” and “Administrative Fees” without details and explanations to conceal ongoing frauds.

210.Mr. Horgan C.P.A., admitted in 2006 to Townsend, “His partial audit findings were so bad, he removed his kids from the school and split his partnership because Mr. Janssen does frauds for Jeffers et al”, now exposed in the criminal conspiracy of embezzlement as members alleged since 1997 and before. The “co-participants” also these years had to conceal that the 18105 Gunn Highway property was not bought by frauds as Townsend has alleged since 05/1997 and now proved per the 1997 Contract For Purchase and by multiple losses by the “Sect” in Hillsborough Courts, Board Of County Commissioners and Zoning Master Meetings. The “Sect” and “Sect Agents” concealed frauds in how they illegally bought the property knowingly lying to the Congregation. (“Just so Beck could have a parsonage with more bathrooms for his daughters and live in the country like his brother Donnie.”)

211.Gray’s just as all Defendants herein and “others Doe” intentional negligence and torts to her clients put her as the adverse agent representing all previous defendants and “others doe”. Service on Gray as defendants co-participant was done timely at all times.

Forma Pauperis status for Townsend ET AL was timely granted and therefore it is the duty of the Clerks of Courts to do services and not object process. A motion to Judge Cook was timely presented to determine service on all Gray Co-participants and “others Doe” but Judge Cook ignored said motion accepting even a Motion to Dismiss by filed by Gray who had already per a Consent Judgement agreed to the Florida Bar and Florida Supreme Court to be disbarred.

212. Townsends Florida Bar, JQC, and 05-3977 Report to Gov. Bush in 11/2005, exposing the criminal acts/omissions of Heather Gary and other defendants as Jane Christy for the Tampa Bar Office said, “your complaint got thrown in the trash!” JQC Executive Director Brooke S. Kennerly wrote a letter and said “the commission lacks jurisdiction”. And attorneys for Jeb Bush said the Governor could not intervene. The law states differently and so does other cases wherein the elements show they or even this 2DCA acted when finally your charges were made against Heather Gray just as you dismissed when Townsend first exposed her in 2004 to you that she was intentionally concealing criminal acts/omissions of Charles Scruggs Et Al now connected again for this Court with other co-participants.

213. Townsend claims and alleges defendants are given unlawful prejudicial privilege because: they were deputies or because of who they were as friends of HCSO Gary Terry et al or because they were needed by Bush, Crist, Harkness, Berry, F.S.CT., or “Others Doe” or George W. Bush protecting his brother Jeb Bush and Charlie Crist and “Others DOE” to be anybody that opposes Randall Townsend? They we connected to Pinellas County Jail Deputy Captain Tim Jeffers and needed to conceal his Deputies acts in the Terry Schiavo case as Tim Jeffers worked with Mr. Schiavo. Gibbs was retained to

represent the family of Terry Schiavo on behalf of Jeb Bush and argues his position that a Church or government should not destroy a life or a family. But in his actions for the “sect” Gibbs, and CLA ET AL, actions show he condoned the opposite even denying Townsend the right to attend the FBCCP Business Meetings and CPCS School Board meetings or Arbitration Meetings, or Student Teacher Parent Meetings regarding the “Sects ET AL” abuse to children as documented by multiple doctors and professionals.

214. Because Deputy Jeffers was prejudiced with HCSO Gary Terry as a co-deputy and their joint effort to reunite a family rather than in this case to use the Aisenberg criminal constructive frauds pattern is as shown by the 1998 letter found in Jeffers file.

215. Gray was retained at the directive of Charles Scruggs for the purpose of the McKay criminal enterprise with her to continue the malfeasance of defendants and states the violations of laws and duty and jurisdiction of “law enforcers” and proves these “officers of the courts” defendants collusion to intentionally do “ineffectiveness of counsel” with others per the Strickland v. Washington, 466 U.S. 688, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984), per the U.S. Supreme Courts articulated two-prong test to determine if counsel is ineffective. All did specific errors and omissions by not requiring deputies and Coast Guard also Chairman of the Deacons Shumate and later Nunez and “Others” to produce all records per demands since 1994 to Member/Respondent(s)/Plaintiffs. All did specific errors and omissions by not requiring deputies, pastors and Coast Guard Shumate and themselves to not do frauds in a Court of Law. [Beck with Howlett on 11/15/2001, and Shumate with Meister on 1/23/03, in the court of Judge Arnold and at other times by their “Sect” Counsel or Karen Harrod Townsend]. Second, the deficiency must have prejudiced the opposing party by depriving them of a fair “day in court”.

216. Plaintiffs have more than as required by the law proved Jeffers ET AL since 1994 has unlawfully “impeded” their rights as a “internal Church body to handle its affairs” or as a victim to redress their grievances to the government or to have their “fair” day per due and equal process in the Church or courts especially by the acts/omissions of this judge the Crooks are Cooked. This 2DCA cannot approve of the dismissal as a matter of law as defendant Gray in July 2009, per her “inactive” and thus could not represent herself, or herself as any defendant as it is proved she never intentionally lawfully advocated the rights of these Plaintiffs.

217. Plaintiffs allege it is because of the “prejudice conspiracy” by Charlie Crist/Bush ET AL to suppress any and all evidence, business, or enterprise that Townsend may have or show that may reveal Crist et al abandoned the rule of law to win his or others political posture and power and illegally tamper with the rights and votes of others.

218. Per 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.”

Every “defendant” and “others doe” as did Chapin, Judge Powell, through Judge Crenshaw with judge Cook and again now judge Orfinger reversing himself and Judge Canady for this Florida Supreme Court in this Complaint and the non action of Attorney General’s up to and including Bondi has basically in defiance of the law and their duties said “Go ahead and conceal the crimes” and violations of Contract and Civil Rights of Plaintiffs as long as you do bribes and pay me to help your unlawful “breach of contract” and “other crimes” take over and as long as you maliciously prosecute and extort naïve

innocent kids allegedly protected even now of their religious rights, due process rights in court, or due process right to address a grievance against the violating government officers and rights to have a father or By-Laws Representative.

219. Plaintiffs and as informed “Citizens of Florida” are fully able and capable for a long time to show the points of law and facts/omissions which meet the RICO standards of proof in: Sedima; Reves; Bennett v. Berg; Turkette ----and the February 1992, the American Bar Association’s McKay Commission Report entitled “Lawyer Regulation for A New Century: Report of the Commission on Evaluation of the Disciplinary Enforcement” co authored by John Berry revealing the “enterprise” of John Harkness with a fiduciary conflict of interest to the Florida Lawyers Mutual Insurance Company (FLMIC) and as to the Florida Bar and John Berry and Governors(Bush/Crist a lawyer) to “bribe” the judiciary and lawyers by loss of their license to practice law just as the Florida Bars words in 1999 said to Townsend “If you ever get your law degree within six months I will see you get disbarred”. The exhibits able to be recorded for the courts and the SC –09-1121, show the Mens Rea “criminal enterprise” of the “law enforcers” and extent to what they do to continue their “enterprise of criminal endeavors” by their superior knowledge and power over these Plaintiffs. Confirmed and now again proved by the agents of the Florida Supreme Court even as judge Orfinger making himself a hypocrite reversing his prior Ordered Rules of Law and then allowed by unconstitutional and unauthorized persons of the Florida Supreme Court as Jackson, Grate and Jenkins on May 26, 2011.

210.Plaintiff Townsend for All Appellants Timely filed a Motion to Transfer this Case and file a complaint against their co-participants to this Federal Court and again sent via

certified mail Claims per Florida Law §768.28. in March 2009, to no avail and again in December 2011 to no avail.

211. Again on May 27, 2011, co-participants continued threats arrest, referred to an alleged legal restraining Order, conspired, did frauds and “impeded” Townsend from his children J.D.T and J.G.T. and the children from this their Father as has been done for larceny, abuse, extortion and obstruction of justice and civil rights since 09/08/1999 and before per the Popper ET AL criminal enterprise.

212. Plaintiff Townsend in an Amicus Brief filed on behalf of Plaintiffs to serve notice to the Florida Supreme Court of the and during their deliberations on the Disbarment of Heather M. Gray the following excerpt:

“West’s F.S.A §61.13(2)(b)1,(3)(a); U.S.C.A. Const.Amend. 1.

1. We have jurisdiction pursuant to article V, section 3(b)(3), Florida Constitution because the decision below expressly construes the first amendment of the United States Constitution.
2. The burden is “incidental” because the state interests which are furthered by the order are “unrelated to the suppression of free expression” United States v. O’Brien 391 U.S. 367, 377, 88 S.Ct. 1673, 1679, 20 L.Ed.2d 672 (1968). Frazier v. Frazier, 109 Fla. 164, 172, 147 So. 464, 467 (1933) (non custodial father is "entitled to have and enjoy [child's] society for a reasonably sufficient length of time each year to enable him to inculcate in her mind a spirit of love, affection and respect for her father," if such is not contrary to best interest of child); see Michael H. v. Gerald D., 491 U.S. 110, 109 S.Ct. 2333, 2342, 105 L.Ed.2d 91 (1989) (parent-child relationship which develops within the unitary family is constitutionally protected); Quilloin v. Walcott, 434 U.S. 246, 254-55, 98 S.Ct. 549, 554, 55, 54 L.Ed.2d 511 (1978) (“the relationship between parent and child is constitutionally protected”).

FIRST FREE WILL BAP. CH. OF BLOUNTSTOWN, INC, v. FRANKLIN, ET AL. 4 So2d 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.”

The pattern of unlawful practices in the Hillsborough County in breach of the County Charter and Florida Constitution.

Hillsborough Sheriff's Department, the Pinellas County Sheriff's Department and State of Florida alleged "Justice System" system has been proved by the Sabrina Aisenberg case (11/24/1999), Aisenberg v. Hillsborough County Sheriff's Office et al. 325 F.Supp.2d. 1366 (M.D.Fla.2004) by Judge Merryday and these same connected defendants (Gary Terry) as in this case now showing "unequal due process" when "deputies are gone bad".

Judge Merryday established his Aisenberg Order based as stated on:

"ROWE 279 F.3d at 1281; see also Jones , 174 F.3d at 1286, ...A police officer is entitled to qualified immunity when performing discretionary functions unless the officer has violated a clearly established right of which a reasonable police officer would have known."

And by this 11th Cir. Standard set in Kingsland 369 F.3d 1210,1223 (11th Cir.2004), stating: "In other words, qualified immunity protects a prosecutor unless the prosecutor's act is so obviously wrong in the light of pre-existing law, the only a plainly incompetent [government agent] or one who was knowingly violating the law would have done such a thing."

Since the conspiracy of Popper began in 1988, each co-participant has known of the fraud and conspiracy Popper started against his Client Townsend leading to the lists of crimes reported by these "persons" who still do not obey the law.

So why is the Divorce Injunction of 2003, still being used per Gray ET AL to keep Townsend from his kids and why have the FBCCP Business Records not been made public as these deputies and pastors in writing in 1997-98, promised and then even the May 10, 2006, Court Order of Judge Crenshaw was violated and refused to be enforced or Defendants not found in "Contempt of Court?"

Because these years of litigation proves the conspiracy started by Chapin/Popper is being carried out through this Florida Supreme Court and its Agents by their own hypocrisy to not follow the law."

213. **WHEREAS** Pursuant to Federal, State, and FBCCP (By-Laws) Constitutions and as Contracts/omissions and Rules of Federal and State Laws and specific contracts/omissions for services between Plaintiffs and Defendants Plaintiffs demanded services and Defendants and "others doe" "fraud, conspire and by arbitrariness" unlawfully "detain" and take children, property and rights and fail to provide "just and honest" services and Plaintiffs demand their arrests, full prosecution per the law and restitution and such punitive damages as to be awarded by a jury of our peers per our rights.

COUNT I. BREACH OF CONTRACT

214.Plaintiffs Randall Townsend, Individual; The First Baptist Church of Citrus Park, a Florida §617 Not for Profit Corporation (FBCCP); J.G.T and J.D.T adopt and incorporate the paragraphs 1 through all, herein this count and state:

215.This is an action for damages in excess of the jurisdictional limits of this Federal Court, exclusive of interest and costs for breach of a contract known as the FBCCP By-Laws between Plaintiff Members and Defendants as those of the “Sect” in their individual capacity and in their Member/Officer “Person”, at relevant times from 1994 till now as Ron Beck; April Beck; Tim Jeffers; Karen Jeffers; Joe Howlett; Jackie Howlett; Herman Meister; Joyce Meister; Geoff Smith; Elbert Nasworthy; Elaine Nasworthy; William T. Brown; Gary Leatherman; Robert Giles; Frank Edwards; Mark Nunes; Tammy Nunes; Paula Powell; David Powell; Dr. Lon Lynn; Gayle Lynn; Karen Harrod Townsend (excluded herein this count in her Person as Wife and or as Mother of J.D.T and J.D.T); Carl Rawls; Duane Milford; Jim Leahy; Michael Corbin; Jackie Corbin; Mike Smoak; Mike Shar; John Collinson; Bill Craft; Ed Hopkins; Jerry Miller; Wilson Smith; Mike Powell; Mike Holness; Mark Jeffers; David Ferguson; Don Beck and “others Doe” to be added after discovery of FBCCP Records which is per the By-Laws is to be available at all times to all Members but not yet afforded this By-Laws Right and Other Rights specifically stated in the document because of the intentional illicit breach of contract of and by these Defendants.

216.Because of the actions of Defendant each Defendant has breached the contract by:

- A. “Public light Defamation” for failure to obey the standards of the By-Laws;
- B. “Prohibiting “Free Will” Speech and “Contract Acts” of these Plaintiffs;

- C. Failure to provide “Honest Services” as stated per the FBCCP Contracts;
- D. Acts of Fraud to these Plaintiffs by their contribution, preparation and publication of “False Business Meeting Reports” and “other Reports” and statements made to members as children and adults and the elderly as those members over the age of 65;
- E. Acts of Fraudulent Inducement to obtain the vote of members to: buy the Earle Property; Obtain Bank Loans; Enter into lawsuits; Retain them as Employees and or as Members;
- F. Acts of Tort Interference with Child Custody, contact and visitation;
- G. Acts of Child Endangerment being placed on busses as defective equipment;
- H. Fraudulent Misappropriation of “Designated funds”;
- I. Acts of Malicious Prosecution in cases 01-15813 and 01-15814 and 02-4974;
- J. Acts as “Hate Crimes” of violations of Religious Rights and Civil Rights;
- K. And other acts not yet exposed because of Defendants and “others” impeding discovery and continuing frauds.

217. WHEREFORE, Plaintiffs demands judgement against Defendant(s) and a reward of General and “Legal Cause” Damages of a number not yet known until discovery of records, plus interest and costs and punitive damages and attorney’s fees, and for such other and further relief as this Court by a jury verdict deems just.

COUNT II. CLAIM FOR BREACH OF CONTRACT LANE

218. Plaintiff Randall Townsend, Individually, and as owner of a.k.a. Future Marketing, (Future) as a Florida Based Food Brokerage Company, at relevant times, comes now and sues Charles E. Lane, Jr.(Lane) and Lane a.k.a. and d.b.a.

Sabal Marketing Inc., (Sabal), a Florida Based Food Brokerage Company based on a Breach of a Contract known as “Brokerage Agreement” signed and notarized August 7, 1987, in Polk County, Florida.

219. Plaintiff's incorporate paragraphs 1- all, herein this count and states:

220. At all times material hereto, Plaintiff Townsend and Future, complied with all conditions precedent to the terms of the “Brokerage Agreement” and to the bringing of this action.

221. Defendants Lane and or as Sabal Breached the “Brokerage Agreement” by:

- A. Making False Claims and Statements relative to the daily practices of the Defendants And Defendants Rights per the Brokerage Agreement from and including August 7, 1987 to present;
- B. Failing to Pay Plaintiffs for services rendered, expenses and costs of services rendered and failing to pay earned and future commissions as stated per the “Brokerage Agreement” Section 4.;
- C. Failing to prove “Honest Services” per the terms of the Agreement.

222. As a result of Defendants' Actions of Breach, the Plaintiffs, Randall Townsend and Future Marketing suffered: interference with child custody and contact since 1999, divorce, emotional distress, abuse, malicious prosecution, defamation, deprivations, illegal detainment; loss of costs and expenses, commissions, future commissions per the Agreement, contract representation and income from Companies Townsend/Future lost or could not acquire based on the false claims of Defendants; loss of his business as Future Marketing; and loss of “Other” employment earnings; and court and attorney's legal fee's and costs and other deprivations yet to be exposed until discovery is

completed.

223. Plaintiffs demand judgement, General and recovery of all available damages and punitive damages from Defendants and a Trial By Jury.

COUNT III. CLAIM FOR FRAUDULENT INDUCEMENT

224. Plaintiff Randall Townsend, Individually, and as owner of a.k.a. Future Marketing, (Future) as a Florida Based Food Brokerage Company, at relevant times, comes now and sues Charles E. Lane, Jr.(Lane) and Lane a.k.a. and d.b.a. Sabal Marketing Inc., (Sabal), a Florida Based Food Brokerage Company based on a claim for Fraudulent Inducement based on False Claims made by Defendants Inducing Townsend to sign a Contract known as “Brokerage Agreement” signed and notarized August 7, 1987, in Polk County, Florida.

225. Plaintiff’s incorporate paragraphs 1- all, herein this count and states:

226. At all times material hereto, Plaintiff Townsend and Future, complied with all conditions precedent to the terms of the “Brokerage Agreement” and to the bringing of this action.

227. Defendants Lane and or as Sabal Induced signing the “Brokerage Agreement” by:

- A. Making False Claims and Statements relative to the daily practices of the Defendants And Defendants Rights per the Brokerage Agreement prior to and from and including August 7, 1987 to present;
- B. Making False Claims and Statements of ownership of contracts and business relationships with the Manufactures listed in Section 1 of the Agreement and with the Companies listed in section 2 of the Agreement and with other Business Relationships Lane/Sabal claimed to be about to contract with thus

needing the Services of Townsend as a Partner in this Joint Venture;

- C. Failing to Pay Plaintiffs for services rendered, expenses and costs of services rendered and failing to pay earned and future commissions as stated per the “Brokerage Agreement” as the immediate income due to Plaintiffs was to immediately be in excess of the amount of the Promissory Note to be rendered by Defendants in good faith based on the business Defendants already had and planned to turn over to Townsend for his “Good Standing” and services for the customers;

228.As a result of Defendants’ Actions of Frauds and Intentional Failure to provide “Honest Services” the Plaintiffs, Randall Townsend and Future Marketing suffered: interference with child custody and contact since 1999, divorce, emotional distress, abuse, malicious prosecution, defamation, illegal detainment; loss of costs and expenses, commissions, future commissions per the Agreement, contract representation and income from Companies Townsend/Future lost or could not acquire based on the false claims of Defendants; loss of his business as Future Marketing; and loss of “Other” employment earnings; and other losses and court and attorney’s legal fee’s and costs.

229.Plaintiffs demand judgement, General and recovery of all available damages and punitive damages from Defendants and a Trial By Jury.

COUNT IV. CLAIM FOR FRAUD BY FRAUDULENT INDUCEMENT

230.COMES NOW, All Plaintiffs and incorporates in this Count herein all Paragraphs 1- through All herein and sues each Defendant as an individual person(s) and in their Official Person(s) Capacities for Fraud(s) and Fraudulent Inducement to deceive Plaintiffs into retaining their membership, association or

services by entering into Contract(s) known as The FBCCP By-Laws, Individual Contracts for Services and Individual Contracts for Fiduciary Services and or as Fiduciary Contracts of and By Elected or Other Government Officials based on a Contract known as the United States Constitution and State of Florida Constitution and Contracts known as Attorney Client Contracts and Client Insurance Contracts, and States:

231. Plaintiff's allege and confirm as stated in all Paragraphs herein this Document and in other records to be discovered and produced that Plaintiffs were and are Fraudulently Induced by the words and actions of each Defendant(s) to for "Honest Services" Obtain their Membership and or Fiduciary Services and or as Elected Services of Defendant(s), individually and or jointly and that such "Claims" for "Honest Services" per the terms of acceptance, affirmations and Oaths of Service per and of the Contracts by Defendants was knowingly, intentionally, and recklessly, negligent and as Torts to obtain property and unjust enrichment from Plaintiffs.

232. As a result of Defendants' Actions of Frauds and Intentional Failure to provide "Honest Services" the Plaintiffs, suffered: Civil Rights losses, emotional distress, abuse, malicious prosecution, defamation, illegal detainment; loss of costs and expenses; and loss of "Other" employment earnings; and other losses and court and attorney's legal fee's and costs and Unnecessary Taxation and "Hate Crimes".

233. Plaintiffs demand judgement, General and recovery of all available damages and punitive damages from Defendants and a Trial By Jury.

COUNT V. WRONGFUL INVASION OF PRIVACY

234. Comes now Plaintiffs, Randall Townsend, Individual, and for and as

**Representative Guardian for J.D.T and J.G.T. his children at relevant times as
Minors and includes Paragraphs 1- all, herein this count and states:**

235. Defendants as individuals, as all named herein are included herein excluding those members as named in Count I., above and included herein is Karen Harrod Townsend in her person as Wife, now Ex-Wife and as Mother, are sued here in this count for Wrongful Invasion of Privacy with aggravating felonies as Assaults, Batteries, Grand larceny, Attempted Murder, Interference with Child Custody and Abduction as in collusion for themselves and their co-conspirators still aiding and abetting themselves to still do their continued acts, Townsend since September 8, 1999, for Himself and for J.D.T and J.G.T. still states:

236. Attorney's General Pam Bondi, Florida Supreme Court Judge Charles Canady now and at previous times, knowingly, intentionally, willfully, recklessly and "Operationally" in "Kolb" manner using Government Persons and including Deputies Jeffers, Howlett, Smoak, Corbin as Non Members Of FBCCP and "others" act unlawfully "under color of law" to detain and "Impede" and continue their illicit practices against Townsend, and his children J.D.T and J.G.T. from their "Free Will" assembly, speech, and Religious Practices as FBCCP members not able to be removed from their "Free Will" practices by frauds and other illegal acts from non FBCCP Contract members have been impeded since or about September 8, 1999.

237. Defendant Karen Harrod Townsend in the persons as Wife, Ex-Wife and Mother to assist herself and her co-participants knowingly, willfully, intentionally and recklessly did in violation of her FBCCP Membership, did her acts per those acting under color of law to prevent Townsend and J.G.T. and J.D.T. from exercising their "Free Will" per the

By-Laws to reveal their violators to the FBCCP Membership via the By-Law Process.

238. Such “Kolb” deprivations are ongoing and Townsend has been prevented from talking or seeing his daughter J.G.T., now since about November 8, 2002, and only a few times in 2007, was Townsend able to see his son J.D.T. as the children and Townsend remain in fear and threats from Defendants and “others Doe”.

239. Defendants and “others doe” act in collusion and Assault since Popper (in and since 1988), with Williams, Chapin, Gibbs and “others” as Officers of the Court and as “Law Enforcers” made the first threats that Townsend would be arrested and or charged with Perjury or loss at trial if Townsend violated the Townsend/Sabal Agreement.

240. In collusion, all Defendants and “others” since 09/08/1999 and before since about October 1994 at the FBCCP Nasworthy admission of violations of By-Laws and Laws and thereafter by “detaining” and threats of arrest by self-dealing “law enforcers as Officers of the Courts acting through themselves and Howlett, Jeffers and Smoak and “others”” on conspired false charges for causing frauds and disturbing a Religious Assembly and Organization per F.S.§871.01 and F.S.§871.02 and being falsely charged with “violence using guns” and Maliciously Prosecuted and “detained” by “sham charges” as “molesting” and “abusing” and “being violent with guns” and an “infidel” and “liar” to his own children or others defendants stated in courts and Church/School assemblies while Townsend has been barred from vindicating himself and chased and detained by law enforcers on public streets and public properties and from Church/School Assemblies, Co-members and documents and trespassed and deprived in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C.A.§2000(e) by Court Injunctions from Church/School/Religious assemblies since 09/08/1999 even on March 31, 2010 and

through May 27, 2011, Defendants and “others” created and continue an “imminent apprehension as a result of that conduct” began by Popper and continues by all alleged “law enforcers” and Others per Florida Criminal Practice Service still on Plaintiffs practice actual acts/omissions of “Batteries as offensive contact causing injury” at various times and do “Child Abuse”, “Elderly Abuse” and abuse on Whistle Blowers by their demonstrations and abuse to the physical, mental and emotional health and for to cause fear of “pay more extortion if you want your rights heard”, “don’t question the acts/omissions of “law enforcers” or “law enforcers speaking through alleged “clergy” and agents” and or fear of going to jail practiced as an example on Townsend and Townsend’s Children subjected to frauds and abuses and others for those whom Townsend speaks per F.S. 617 and F.S. §39.01(2) and F.S. §415.102(1) even on the continuing events done on May 26-27, 2011 and since as these crimes escalate since these assault acts/omissions are practiced on Religious Persons.

241. Plaintiffs spent the entire time from about September 8, 1999 to current times detained from their Free Will practice of Contract and Constitutional Rights.

242. Defendants and “others doe” without just cause or lawful protection under their Oath per Contracts/omissions or Color of Law did and intend to do larceny and bodily harm to Plaintiffs and did: NEGLIGENCE IN THE CARE OF MINOR(S) per F.S. 827; and F.S. 827.08 Misuse of child support money; and per F.S. 775.085 and F.S. 775.089 are to receive restitution.

243. By assault(s), batteries and continuing “imminent apprehension as a result of that conduct” plaintiffs were and are seriously injured and sustained defamation, physical, mental and emotional injuries requiring professional treatments, financial losses, property

losses, loss of Business Advantages, loss of Civil Rights not yet fully discovered due to the “fraud, collusion and arbitrariness” by Defendants and others.

244. As a result of Defendants’ Actions of Frauds and Intentional Failure to provide “Honest Services” the Plaintiffs, suffered: Civil Rights losses, emotional distress, abuse, malicious prosecution, defamation, illegal detainment; loss of costs and expenses; and loss of “Other” employment earnings; and other losses and court and attorney’s legal fee’s and costs and “Hate Crimes”.

245. Wherefore, Plaintiffs request judgement against each defendant and “others doe” for damages in a sum within the jurisdictional limits of this court, together with costs of suit, punitive damages and any further relief as the court deems proper.

246. Per Florida Constitution Article I. Section 3. Plaintiffs demands trial by jury in the above entitled action.

**COUNT VI. CLAIM FOR INTERFERENCE WITH AN
ADVANTAGEOUS BUSINESS RELATIONSHIP(S)**

247. Plaintiff Randall Townsend, Individual and at relevant times a.k.a. d.b.a. Future Marketing comes now and incorporates herein all paragraphs 1- all now herein this count and states all Defendants and variable and relevant times by their intentional acts of Torts and failure to provide “Honest Services have aided themselves and others to interfere in Plaintiffs Townsend/Future Advantageous Business Relationships and Contracts as:

248. Clay Woods, a Bonneau Corporation Vice President, wanted to hire Townsend/Future for Bonneau Corporation to sell “Glasses and related items” at Winn Dixie and at other Accounts as listed in the August 7, 1987 “Agreement” and or as a consultant for Bonneau, but Lane, Charlie Williams, Popper and Chapin ET AL said “no”

and made what are now proved “False and Fraudulent Claims” as the August 15, 1988, Jim Brennan letter shows because of Lanes business practices Lane as Townsend alleged was banned from Companies and thus Brennan was hired rather than Townsend because of the false claims of Defendants and Winn Dixie is added to the Sabal Contract for the first time and not as Lane ET AL had falsely alleged and intentionally concealed by the collusion of Popper, Chapin, Williams, Powell and others but exposed by the partial production of documents finally done in April 27, 1992, exposing the alleged “Honest Services” provided by Popper and his Co-Defendants herein has been an intentional Exparte and Extrinsic Fraud and is still an ongoing Extrinsic Fraud based on the ruling of Judge Orfinger in **ROBINSON** id in 2006, and the admissions of Judge Canady in 2011.

249. Townsend/Future also suffers Economic Losses and deprivations due to frauds and torts of interference with Other lines Townsend/Future represented and Lost or could not obtain based on the Fraud of Defendants using Judge Powell and Others creating an alleged a Non-Compete Agreement with Lane.

250. Townsend alleges and believes based on comments by competent persons that Defendants collusion to require Townsend to turn over trade secret documents that Plaintiffs suffered losses of Rank Retail Inc. per the Lane ET AL, Joe Ligori per William Smith connection.

251. Townsend/Future also alleges and believes multiple other advantageous business relationships with Florida Rep’s, and many other companies that Townsends’ contacts wanted him to handle, were deprivated and lost because of the torts of Defendants requiring Townsend/Future to: per the Chapin/Powell Scheme turn over trade secret documents; Do not do business until the Lane/Sabal records were revealed which still in

2012 have never been produced; and per the collusion by Defendants to defame Townsend rather than Lane as the violator of the “Brokerage Agreement” of 8/7/1987.

252. Townsend further alleges and believes as HCSO Deputies in 1999, said apply as detective at HCSO, Townsend is prevented from said act by the collusion of Defendants to defame and deprive Townsend so facts as in this Complaint are not exposed.

253. Townsend further alleges and believes he suffered Financial losses from: Sunbelt Equipment Sales, Inc; Kmart Employment; and as in seeking his license to practice law as told by Bar Officers “If you ever get your law degree...”, due to the defamation and deprivations of all Defendants starting with the misrepresentations from Lane, Williams, Popper and Chapin ET AL still ongoing until Townsend is vindicated once collecting all discovery and after a trial hearing the jury verdict and for the years since 1987 from financing this litigation.

254. As a result of Defendants’ Actions of Frauds and Intentional Failure to provide “Honest Services” the Plaintiffs, suffered: Civil Rights losses, emotional distress, abuse, malicious prosecution, defamation, illegal detainment; loss of costs and expenses; and loss of “Other” employment earnings; and other losses and court and attorney’s legal fee’s and costs and “Hate Crimes”.

255. Plaintiffs demand judgement, General and recovery of all available damages and punitive damages from Defendants and a Trial By Jury.

COUNT VII. WRONGFUL INVASION OF PRIVACY

256. COMES NOW, Plaintiffs, Townsend, Individual, FBCCP a F.S. §617 Not for Profit Florida Corporation, THE FBCCP BODY as non-sect members, J.G.T. and J.D.T. and alleges and incorporates all paragraphs 1-all herein and believes:

257. Defendants in this count are the State of Florida, and each agency of the State of Florida as stated herein paragraphs 1-all. Plaintiff presented claims, in writing to Defendants and the Department of Financial Services, in compliance with Section 768.28 of the Florida Statutes up to and through 12/11. No action by Defendants has been timely answered by legal due process but direct collusion, threats, extortion, Perjury per F.S.837, and bribery show a RICO pattern of and intent of Defendants.

258. This is an action in negligence and in torts with Plaintiffs seeking damages in excess of the jurisdictional minimum of this Honorable Court.

259. Since on or about 1991, via the McKay criminal enterprise of Popper ET AL with the intentional conspiracy, aiding and abetting of; Chapins, Chapin ET AL; and specifically Bar Members; Harkness; Berry; Gibbs; Gardner; Grant; and “others Doe”; and via Jeffers, Howlett, Smoak, Corbin as Deputies; and others at later times continued by Sheriffs of Hillsborough, Pasco, Pinellas and Santa Rosa Counties; Bar Members of Orlando and Tampa (With Offices located on Federal Property) Offices, Bean, Lee, Turmel, Tropp, Dickinson and Gibbons as Denny and Rolfes, Scruggs ET AL, Gray ET AL; J.Q.C. and Judges; Attorneys Generals, Governors, DCF, FDLE, these Defendants and their Superior Officers as now Attorney’s General Pam Bondi and Florida Supreme Court Justice Charles Canady still wrongfully intrude by aiding and abetting Deputies Jeffers, Howlett, Smoak, Corbin, as “Government Non Members” to the FBCCP to by torts to “impede” the Townsend ET AL investigation began in or about October 1994 till now of admitted violations of FBCCP Religious and Operational By-Laws and specifically on Sept. 8 1999 through today via all defendants and “others Doe” to distract attention from

their larceny, violations of law and by violations of Due Process and Tort laws wrongfully intruded and still intrude to “impede” and Obstruct Justice into the FBCCP Corporation and non-sect “Operational” members Rights depriving Plaintiffs and “Placing Plaintiffs in a False Light in the Public Eye” and by illegal Extortion, detainment and kidnapping have “impeded” Religious and all assembly of Townsend even from his children and other members since 9/8/1999, without Legal Due Process or FBCCP By-Laws Process.

260. The direct and proximate cause of Plaintiff’s injuries is the negligence of the State Of Florida Agents and Agencies in that they were notified and warned of the Risk and the existence of the hazardous conditions caused and even reported by Florida Bar Officers Harkness and Barry and understood by the Florida Supreme Court, Governors and other Officers being informed of other similar incidents and these Departments nonetheless had failed to act to remedy the condition, or to warn the general public of its dangerous existence by reasonable practices of Honest Services obeying the Florida Constitution and Laws instead of granting themselves alleged immunity.

261. This action is maintained according to the principles of law that The Florida Constitution Article I. Section 3. Required “THE PEOPLE” not a government entity or government persons self-dealing their own alleged sovereign immunity when it is performing such operational level functions as proper construction or installation and design of a public improvement, the necessary warning or correction of a known dangerous condition and the necessary and proper maintenance of existing public improvements as Rights of Jury Process, Rights to

protect from Undue Process, Rights to protect from “fraud, collusion and arbitrariness” of Government Persons per Florida Constitution Article I, Section 3. And therefore Defendant’s acts to maintain Citizens Rights in question, is conduct for which Defendant may not claim sovereign immunity. Defendants also by fraud violate the intent of the citizens of the State of Florida as Defendants Falsely claim citizens by Jenkins v. State allegedly allowing a P.C.A. means Citizens willfully and knowingly gave up all rights of Constitutional Due Process when Officers of the State use P.C.A. in RICO Acts to conceal themselves against our Citizens Rights.

262.As a direct result of Defendants’ Omissions, Actions of Frauds and Intentional Failure to provide “Honest Services” as alleged and itemized in paragraphs 1-all, included herein, the Plaintiffs, suffered: Civil Rights losses, emotional distress, pain and suffering, abuse, malicious prosecution, defamation, illegal detainment; loss of employment(s); loss of costs and expenses; batteries, and other deprivations still being tabulated; and other losses and court and attorney’s legal fee’s and costs and **“Hate Crimes” based on Religious Rights and Race and Speech and Voting Practices.**

263.Plaintiffs demand judgement, General and recovery of all available damages and punitive damages from Defendants and a Trial By Jury.

264.Plaintiff allege this pattern of criminal activity by Defendants warrants status of this Cause as a Class Action to be decided by a Federal Jury of Florida Citizens.

COUNT VIII. UNJUST ENRICHMENT

265. ALL Plaintiffs Come Now and adopt and include herein the foregoing facts/omissions of Paragraph 1-all, into this count and a claim is made against each Defendant and “others Doe” to be named after discovery, in or as persons

individually and collectively for their violations of law per F.S. 817.02 (Obtaining property by false personation).

266. Defendants individually and collectively will be unjustly enriched at the expense of Plaintiffs unless Defendant is made to pay Plaintiff in the sum not yet determined due to illegally “Impeded” Discovery by Defendants which Defendants have failed and refused to repay.

267. Wherefore, Plaintiffs request that this Court enter judgement against each Defendant for damages in excess of the jurisdictional limits of this court, plus interest and costs of this action, trial by jury of all issues so triable and for such other and further relief as the Court and jury deems just and proper.

COUNT IX. CLAIM FOR ACCOUNTINGS AND DISCOVERY OF RECORDS REGARDING CERTAIN MONIES DUE AND OWING PLAINTIFFS TAKEN BY LARCENY AND FRAUD

268. This is an action for an accounting of profits and monies by Defendants regarding certain monies due and owing to Plaintiffs, as FBCCP and Townsend.

269. Plaintiffs adopts and realleges the allegations of Paragraphs 1-all herein.

270. The relationship(s) created between Plaintiffs and Defendants, by virtue of their By-Laws and Contracts constitutes Plaintiffs Rights of an Accounting(s).

271. Plaintiffs has a right to an accounting of the monies collected by Defendants, pursuant to the FBCCP By-Laws and Sabal and Sunbelt Contracts in that the monies are Plaintiffs Property.

272. Plaintiffs have demanded that Defendant account to Plaintiffs for the aforesaid funds which Defendant is collecting from unknown sources which Plaintiff has an interest but is refusing to account to Plaintiffs or remit such monies to Plaintiffs.

273. Plaintiffs has no adequate remedy at law.

274. WHEREFORE, Plaintiffs prays:

- A. That a summons issue directed to each of the individual defendants requiring them to appear in this court and answer this complaint.**
- B. That the individual Defendants be directed to account for all the sums of money, profits, and gains which defendants have made since 1987 as a result of the above described conspiracy.**
- C. An accounting for relevant times be had between Plaintiffs and Defendants.**
- D. That a receiver be appointed per Rule 66 of the Federal Rules of Civil Procedure to take charge of the property and the accounts of Lane, Sabal, FBCCP/CPCS, “Named Sect Members”, Chapins ET AL, Gibbs/CLA ET AL, Scruggs ET AL, Gray ET AL, Dickinson & Gibbons, Grant ET AL, Norman ET AL, Bondi ET AL, Ober ET AL, Crist ET AL, Jeb Bush ET AL, Bean ET AL, Harrods ET AL, Sunbelt, Bob and Donna Tronu, Sears Holding, LLC., Each Bar Member and Each Defendant and other Defendants to be named upon additional Discovery to prevent further diminution and conspiracy and loss to Plaintiffs because of the actions of these conspiring Defendants self-dealings.**
- E. That the Court decree, upon the completion of such accounting, that he Defendant pay to Plaintiff such sums as shall be ascertained to be due to Plaintiffs from Defendants.**
- F. That Bench Warrants be issued and prosecuted to the fullest extent of the law for each defendant for their Grand Larceny, Abductions, Conspiracy**

and Unjust Enrichment of Plaintiffs Property.

G. That Plaintiffs have his costs and fees of this action, trial by jury of all issues so triable and such other and further relief as this court and a jury may deem just and proper.

COUNT X. RACKETEERING

275. Plaintiffs adopt and include herein the foregoing facts/omissions as stated in Paragraphs 1-all, herein now into this count.

276. 18 USC 1961, et sequitur, affords certain civil remedies to persons harmed by racketeering activities. The Plaintiffs seek all forms of relief afforded them under the Federal “RICO ACT”.

277. The multiple illicit “predicate acts” of racketeering engaged in by Defendants include but are not necessarily limited to: extortion; interference with commerce; fraud; violations of Religious Rights and other Civil Rights as Assembly, Speech, Voting, Due Process in prosecution of Criminal Acts; Unlawful search and seizure; unlawful detainment, interference with Child Custody; malicious prosecution with malice; battery; attempted murder; mail fraud, bank frauds, government assistance fraud; obstruction of justice; including but not limited to violations of 18 USC 1951, as well as deprivation by fraud of honest services, as set forth in 18 USC 1346; threats not to file legal complaints reporting Federal Crimes; and other acts still being revealed as Defendants conspire to conceal Discovery from this Respondent to Federal Criminal Charges this now Plaintiff Townsend is from which is trying to be vindicated.

278. Directly and Indirectly Defendants under the Conspired Operational

Directives of Florida Supreme Court Judges, Lower Court Judges, Governors, Attorney's General Pam Bondi, FDLE, Insurance Companies, Sheriff's, Florida Bar and JQC Officers, The Department of Financial Services and other Defendants are engaged, one with the other and in conspiracy with the individuals who are Defendants here, in a pattern of racketeering activity whereby "Others" are threatened if they come to the legal assistance of Townsend and other Plaintiffs.

279. Further, all of the Defendants have conspired to: interfere with commerce by obstructing Townsend from his clients and by insurance companies fraudulent practices, FBCCP and its members Religious Practices and by Defendants filing false claims for Medical and Government Assistance; at the expense of these citizens and unfairly targeted law abiding Others.

280. The use by all Defendants of the United States Postal Service, as well as by other means of communication, in furtherance of this pattern of racketeering activity constitutes mail fraud.

281. Specifically, in violation of 18, USC 1951, Defendants have engaged in fraud By presenting themselves as if they were fiduciaries providing "Honest Services" and products; when in fact, they have been collaborating and conspiring to enrich themselves, their alleged sovereign powers and their racketeering enterprises.

282. Specifically, in violation of 18, USC 1346, Defendants have deprived Plaintiffs and the public of "Honest Services" by pretending to exercise legitimate regulatory functions, under color of law, when in fact they have been as revealed by their own words revealed in the McKay Plan and Plot to actively be in the Plan of harming Plaintiffs and the public by protecting themselves, other wrongdoers and

punishing innocent victims and Plaintiffs, for their commercial gain and unjust enrichment and power.

283.WHEREFORE, Plaintiffs seek all appropriate relief available to them against all Defendants such relief being set forth in 18 USC 1961, et sequitur, for all of the aforementioned racketeering activities set forth.

COUNT XI. ANTI-TRUST

284.Plaintiffs adopt and include herein the foregoing facts/omissions in Paragraphs 1-all herein, into this count and alleges and believes.

285.Section 15 of Chapter One of Title 15 of the USC affords individuals harmed by violations of federal anti-trust laws certain remedies which the Plaintiffs herein seek against the Defendants herein and “Others Doe” to be named with additional discovery which Defendants conspire to “impede”.

286.The Defendants have all conspired to restrain trade or commerce in pursuit of a monopoly in violation of Section 1, Chapter One, Title 14, USC.

287.Specifically, the Defendants by:

- A. Aiding and Abetting the frauds of Lane/Sabal and prohibiting Townsend/Future from his rightful services to his clients;**
- B. Aiding and Abetting the frauds of Popper, Williams, Chapin and Judges Powell and Florida Bar Officers, FDLE, and Governors and “others Doe” for the purposes of assisting in concealing Criminal Actions so not to be discovered during the vetting process of Linda Chapin to run on the Democratic Ticket with Buddy McKay;**
- C. Aiding and Abetting the frauds of Bush, Crist, Ober, FDLE, Judges,**

Attorney's Generals, Senators and "others Doe" for the purposes of assisting in concealing Criminal Action so not to be discovered during elections;

D. Aiding and Abetting Plaintiffs Lawyers concealing Criminal Acts by Defendants on these Plaintiffs;

E. Aiding and Abetting Sheriff Deputies Jeffers, Howlett, Smoak, Corbin and Others in their illegal process in violation of the FBCCP By-Laws and Florida State Constitution and Florida Laws to obtain "Operation" and "Control" without supervision of the "Congregational Body" as required per the By-Laws;

F. Aiding and Abetting Defendants of Kmart, Sunbelt and "Others" to withhold monies owed to Plaintiffs and terminate without cause their employment just for the purposes of concealing the criminal enterprise of Defendants;

G. Aiding and Abetting Dr. Lon Lynn, Gayle Lynn, and Select FBCCP Employees and "others Doe" in the processing and falsely claiming Government Funds and Medical Services so to conceal deprivations done to Plaintiffs;

H. And Other Acts not yet fully revealed;

Shows and proves Defendants operating in such a pattern as to improperly weave a governmental function under color of state law, to their commercial interests, have sought and secured a competitive advantage over other legally operating persons by providing "selective prosecution" on those who are Whistle Blowers to their

criminal enterprise.

288. Defendants by their conspiracy to deprive these Plaintiffs of legal services and due process and their rights to earn a living unjustly deprive these Plaintiffs to be on an equal status with others who may not be of the same ethical status.

289. All of these Plaintiffs, then by virtue of being FBCCP Members, or clients of these lawyers or the electorate of these Political and Government Persons have been harmed by Defendants' restraint of trade, illegal services and monopolistic practices.

290. WHEREFORE, all Plaintiffs seek, to the extent allowable under Section 15, Chapter One, Title 15 all damages and all other relief allowable per the laws.

Plaintiffs adopt and include herein the foregoing facts/omissions into this count.

COUNT XII. AS AND FOR A CAUSE OF ACTION AGAINST DEFENDANTS FOR INADEQUATE TRAINING, SUPERVISION AND DISCIPLINE PER RESPONDENT SUPERIOR AND VICARIOUS LIABILITY

291. Plaintiffs adopt and include herein the foregoing facts/omissions into this Count and requests each Defendant be required to be retrained, and during the periods of their incarceration and probation be required to once each week read this legal Complaint, The United States Constitution, The Florida Constitution and The FBCCP By-Laws of 1993, in remembrance of their illicit conduct and the contracts they deliberately chose to violate.

Plaintiffs seek immediate WRITS OF: MANDAMUS; HABEAS CORPUS;

PROHIBITION; AND RESTITUTION AND ARREST WARRANTS FOR

DEFENDANTS PER FURTHER CASES AFFIRMING CLAIMS AND BELIEFS

OF PLAINTIFFS:

- a. TOWNSEND v TEAGLE 467 So2d 772, 1985
- b. McNULTY v HURLEY 97 So2d 185, 1957, Fla SCt. 1357
- c. LaTORRE v FIRST BAPTIST CHURCH OF OJUS 498 So2d 455, 1986
- d. HEMPHILL v. ZION HOPE PRIMITIVE BAPTIST 447, So2d 976, 1984
- e. COVINGTON v. BOWERS 442 So2d 1068, 1983
- f. FIRST INDEPENDENT MISS. BAPTIST CHURCH v. McMILLAN 153 So2d 337, 1963.
- g. DOE v. EVANS 814 So2d 370, Fla. SCt. 94450 (Fla. 2002)
- h. MALICKI v. DOE 814 So2d 347, Fla SCt. 2002
- i. DOE v. DORSEY 683 So2d 614, 617 (Fla. 5th DCA 1996)
- j. HUNTER v. FIRST BAPTIST CHURCH INC. 294 So2d 355, 1974
- k. PRIEST v.GROOVER 289. So2d 767 (Fla. App. 1974), 1974
- l. LaGORCE COUNTRY CLUB v. CERAMI 74 So2d 95, 1954, Fla SCt. 1307
- m. LLOYD v HINES 474 So2d 376, 1985
- n. TSAVARIS v. SCRUGGS 360 So2d 745, 1977 Fla. SCt 1609

CERTIFICATION OF CLASS

Plaintiffs adopt and include herein the foregoing facts/omissions into this cause.

Under Rule 23, Federal Rules of Civil Procedure, these named Plaintiffs herein are the typical representatives of a class of individuals yet unknown, who are either members of the public, such as Townsend, The FBCCP, Minor Children, who have been harmed by lawyers, Government Persons, and Doctors by means of breaches of the Florida Bar's Rules of Professional Responsibility and Professional Services and the Medical Code and Department of Financial Responsibilities and who the Defendants have conspired to

protect, at the expense of the public, or who are, like Plaintiffs who have do no wrong and yet who have as FBCCP non-sect members and CPCS members and the public who have been targeted improperly for discipline because of the insinuation of commercial, civil rights and due process concerns and other improper influences upon the disciplinary process.

Other members of this class, then, would include non-lawyers, as well as lawyers who have been victimized by the Defendants, who are masquerading as public servants, or elected servants, when in fact they have been tyrants acting under color of law and under cover of state law.

WHEREFORE, the Plaintiffs seek certification by the court that this action should be and is a class action.

DEMAND FOR TRIAL BY JURY

Plaintiffs demand a trial by jury of all issues so triable.

STATEMENT OF SERVICE

I, Randall Townsend, hereby certify that a copy of the foregoing was provided by HAND delivery this_29th day of _May_ 2012, to the Clerk of the Courts, at the United States District Court Middle District of Florida, 801 N. Florida Avenue, Tampa, Florida 33602 and by U.S. Mail to Florida Supreme Court Chief Judge Canady at 500 South Duval Street, Tallahassee, Florida 32399 and to Florida Attorney's General Pam Bondi at Heather M. Gray at P.O. Box 2668, Riverview, Florida 33568 and The First Baptist Church Of Citrus Park 7705 Gunn Highway, Tampa, Florida 33625.

Respectfully submitted,

Randall C. Townsend, Pro Se
P.O. Box 21, Odessa, Fl. 33556
941 350-2677

VOICE FOR "ALL" PLAINTIFFS
Jfyr59@hotmail.com
www.Judgeoneyourself.com

SUPPORTING AFFIDAVIT

BEFORE ME THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED RANDALL C. TOWNSEND, PRESENTING IDENTIFICATON, WHO UPON BEING DULY SWORN AND CAUTIONED EXECUTED AND STATED IN HIS OWN WORDS AND TOOK AN OATH THAT THE STATEMENTS AND THE THINGS CONTAINED THEREIN ARE TRUE AND CORRECT, TO THE BEST OF HIS KNOWLEDGE, INFORMATION AND BELIEF.

WITNESS MY HAND AND OFFICIAL SEAL THIS _29th_ DAY OF __May_,
2012

BY ID PRODUCED_____FL DL_____

NOTARY PUBLIC: Sejla Hadziadbic