

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT (TAMPA) FLORIDA
CASE NO.: 8:12-CV-1198-T-17EAJ**

AMENDED COMPLAINT

RANDALL C. TOWNSEND,)
Individually, and as F.S. § 617.0834,))
“Representative” As on behalf of all)
other society 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)
Plaintiffs/Respondents)

CONCERT OF ACTION
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]
11th Cir. 08-10721-A
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 NOW ABOVE PLAINTIFFS]
And her Co-Defendants/Co-Conspirators as;

L.T. CIRCUIT CASE NO: 02-03812
2DCA- CASE NO: 2D07-4861
FROM CASE NO: 01-15813 and 01-15814
OF FAMILY COURT –DOMESTIC
VIOLENCE DIVISION, &
02-4974-DIVORCE, AND
By Motions for Consolidation of related cases
herein, as seeking to be heard and tried by a 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 COMMITTEES OF FBCCP/CPCS, 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; MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMATE, AS CHAIRMAN OF DEACONS, 2000-2001; 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, 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, MEMBER OF LRPC 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 (LRPC); MIKE SMOAK, AS Individually, MIKE SMOAK AS CPCS BOARD MEMBER, 99-07 MIKE SHAR, Individually, THE FIRST BAPTIST CHURCH OF CITRUS PARK BOARD OF DEACONS OF 1999-2000-2001-2002-2003-2004-2005-2006-2012 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 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 A RELIGIOUS SOCIETY 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 Divorce Court and
APPEALS CASE: 2D06-3469

FLORIDA S.Ct. SC07-1181

FROM CASE NO: 01-15814 and
related CASE NO: 01-15813 and

02-03812

STEVEN TYLER HARROD, Individually,

DONALD HARROD, Individually,

NORMA HARROD, Individually,

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,

THE CHRISTIAN LAW ASSOCIATION (CLA), A FLORIDA CORPORATION

DAVID GIBBS, III, Individual, DAVID GIBBS, III, AS ATTORNEY AT LAW, GIBBS LAW FIRM.

P.A., DAVID GIBBS, III, AS ATTORNEY, OF THE CHRISTIAN LAW ASSOCIATION

DREW GARDNER, AS Individual, DREW GARDNER AS ATTORNEY FOR THE CLA;

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” MACKAY, 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 OF THE BOARD OF EDUCATION FOR THE STATE OF FLORIDA;

CHARLIE CRIST, AS FORMER 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;
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;
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, (FDLE)
MICHAEL O'CONNELL, Individually,
MICHAEL O'CONNELL, SPECIAL AGENT FOR THE FDLE
MR. GUY TUNNELL, FORMER COMMISSIONER, FDLE, NOW AS
MR. GERALD BAILEY COMMISSIONER, FDLE,
THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT (FDLE)
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 PETSCHEN(SP), individually and BOB PETSCHEN(SP), AS ASSISTANT TO THE STATE
ATTORNEY
CHUCK HOLLAND, individually and CHUCK HOLLAND AS ASSISTANT 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 JUDGE OF HILLSBOROUGH COUNTY FLORIDA,
RAUL PALOMINO, Individually,
JUDGE RAUL PALOMINO, A CIRCUIT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA,
FRANK GOMEZ, Individually,
JUDGE FRANK GOMEZ A CIRCUIT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA,
MONICA SIERRA, Individually,
JUDGE MONICA SIERRA, A CIRCUIT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA,
RALPH STODDARD, Individually,
JUDGE RALPH STODDARD, A CIRCUIT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA,
GREG HOLDER, Individually,
JUDGE GREG HOLDER, A CIRCUIT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA,
MARVA CRENSHAW, Individually,
JUDGE MARVA CRENSHAW, A CIRCUIT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA,
MARVA CRENSHAW , A JUDGE FOR THE STATE OF FLORIDA, 2nd DCA;
REX M. BARBAS, Individually,
JUDGE REX M. BARBAS, A CIRCUIT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA,
MARTHA J. COOK, Individually,
JUDGE MARTHA J. COOK, A CIRCUIT 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, Individually, 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 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 PROCEEDURES 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 (2nd DCA) and JUDGES OF THE 2nd DCA 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 BIRKHOLO, Individually AND AS CLERK OF THE 2nd DCA;
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;
SUNBELT EQUIPMENT SALES, INC.; BOB TRONU, SUNBELT, PRESIDENT;
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;
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, 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 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,
STANDORD 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, 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 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;
BOB BUTTERWORTH, Individually;
WILLIAM MCCULLOM, Individually;
Kenneth Hood (Buddy) MacKay, Jr., Individually;
JEB BUSH, Individually;
GEORGE W. BUSH, Individually;
TONI JENNINGS, Individually,
TONI JENNINGS, AS LT. GOVERNOR OF FLORIDA;
MEL MARTINEZ, a.k.a. Melquiades Rafael Martinez Ruiz, Individually;
MEL MARTINEZ, ORLANDO COUNTY COMMISSION CHAIRPERSON;
MEL MARTINEZ, DIRECTOR OF U.S. HOUSING AND URBAN DEVELOPMENT;
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;
THE FLORIDA BAR BOARD OF GOVERNORS;
CHARLES CANADY, Individual, CHARLES CANADY, AS JUSTICE FLORIDA 2ND DCA,
CHARLES CANADY, AS CHIEF JUSTICE 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;
“OTHERS DOE”, as any yet unknown accomplice to the acts of defendants herein;

AS DEFENDANTS

**COMPLAINT FOR CAUSES OF ACTIONS OF: TORT INTERFERENCE
WITH CONTRACTS AND A RELIGIOUS SOCIETY AND CIVIL RIGHTS;
CONSPIRACY; MALICIOUS PROSECUTION WITH MALICE; FEDERAL
RICO AND ANTI-TRUST LAWS; AND ACCOUNTING(S) AND CLASS ACTION**

COMES NOW Plaintiff, a Respondent, Randall Townsend (Townsend) pro se, for or “Derivatively” for all Plaintiffs as the Malum in Se Malfeasance Contra Pacem Racketeering for Political Criminal Power Plot and Quid Pro Quo Acts against us as U.S. Citizens is admitted by the 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, Florida State Courts and U.S. and Florida Government Agencies/Agents And Multiple RESPONDENT Complaints from being Publicly Charged with Federal Criminal Acts, detained and “Unlawfully Trespassed” from inside his Church while Conducting his “Elected by the Members, his Officer Duties since 1994” by False claims created by “Masked” Jeffers/Gibbs/Bush(s) ET AL Agents as retaliation and fraud which aided and abetted “MacKay” 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, speaks;

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 full 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 ET AL have violated the By-Laws by “Trespassing” and “Maliciously Prosecuting Members” and as “impeding” members from even voting per the By-Laws to appoint “others” as their wives to employee positions so their children receive a free private education or retain themselves or Geoff Smith as Trustees who ignore Bylaws and Civil Rights violations;

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 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 Plaintiff J.G.T. (born 1985) is the Daughter and a Minor 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 “bullied” and abducted against her and her brothers J.D.T.’s will by all Defendants and “Others DOE” from her safe home and her proved safe father since 10/20/1999 for the purpose of a false public light fraud started by Townsend’s attorneys the kids were forced to be detained with her deranged mother and the abusive 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;

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 Defendants, and “others Doe” per F.S.777, **PRINCIPAL; ACCESSORY; ATTEMPT; SOLICITATION; CONSPIRACY** who conspire even after the 2011 Admissions by F.S.Ct. Chief Judge Canady Indicting himself and these Named 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 Sham Actions” of Past “Fraudulent and Defamation Predictions” as Townsend alleged to all since 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 and losing his business and just to cover up his diversion of Townsend’s funds and Lanes illegal drug uses;
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 “Buddy MacKay Plot” as admitted by Judges Canady, Orfinger, Lawson, Sawaya and “others” as 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 MacKay; Chapin(s); Chiles; Harkness; Berry; Bush(s); Crist; FDLE; Pam Bondi; Florida Supreme Court Judges; 5th DCA, 2nd DCA, 9th and 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; 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 and Scruggs and Gray were retained to secure said lost money and punitive damages due Townsend; 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 10/10/1999, “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” to conceal her criminal acts of attempted murder, batteries on her kids and husband and tax fraud! Townsend now claims he has proved and has exposed these facts of which Scruggs, 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 to conceal their corruption in violation of the Intent of the voters per Constitutional Law Change 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...” Specifically BUSH ET AL in Restructuring the Florida Cabinet for his controls 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 now as Townsend 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 relying on the Laws and various cases as listed below acts against various “Sect persons” as “Non-member Law Enforcers”, fraudulent “clergy”, employees, “others DOE” as:

2. **The Defendants now as Plaintiff is ignorant of more to be named upon discovery:**

A. Defendant as The STATE OF FLORIDA:

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

C. Defendants as State of Florida Constitutional or as Approved by the Governors and Florida Secretary of State as Business Entities, Fiduciaries 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, John Berry and “others” as Board of Governors, Officers and Members.

(3) Defendant, The Florida Supreme Court, alleges to act lawfully per Florida Rules

of Court, 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 political motives illegally for themselves and the Co-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 MacKay, Jeb Bush, Charlie Crist and Rick Scott are to act:

Florida Statutes 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 Bruce Chapin, Popper, Williams, Lane/Sabal and “Others” our Governors for their political party benefit have: aided and abetted the crimes;

(5) Defendant, Florida Department of Law Enforcement (FDLE) under the care and supervision of Guy Tunnell and Gerald Bailey in collusion for the political benefit of the Governors “allege” to act as the Law Enforcement Arm of State Officers per the Florida Statues;

(6) 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, served themselves over these citizens rights 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 Chapin ET AL, Gibbs, III, ET AL., Grant ET AL, Scruggs 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.

(7) Defendant, Judicial Qualifications Commission, is created per the Florida Legislature per the Florida Constitution Article V. Section 12. And is

“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 by a “JURY PROCESS” equally to all Plaintiffs.

(8) 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 and for Townsend from 1989-1993.

(9) Defendant, David H. Popper, Individual; and David H. Popper P.A., a professional association, and Florida Bar Member (1979); as Attorney At Law, (Popper) at relevant times operates as the employee, agent, actual or apparent of David H. Popper P.A. acting within the scope of his “Of Counsel” practice out of Orlando, Florida, Orange County.

(10) Defendant, O’Neill, Chapin, Liebman, Marks, Popper, Cooper, ET AL, a professional association, transacting it business out of Orlando, Florida, Orange County Florida and employed the relevant actors as Bruce E. Chapin and David H. Poppers as Partners.

(11) Defendant, Charles E. Williams Jr, Individual; and Charles E. Williams Jr. P.A., a professional association, and Florida Bar Member (1982); (Williams) at relevant times operates as the employee, agent, actual or apparent of Charles Williams Jr. P.A. acting within the scope of his “OF Counsel” practice out of Orlando, Florida, Orange County at times for Lane.

(12) 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 and with Townsend signed a “Brokerage Agreement” as attached herein.

(13) 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 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;

(14) 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 deprivate Townsend ET AL.

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

(16) Defendants, Hillsborough County Sheriffs Office, (HCSO) Pinellas County Sheriff Office, Pasco County Sheriff Office, Santa Rosa County Sheriffs office, Polk County Sheriff Office, 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 County Charters and Ordinances.

(17) 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 from July 2000, until his termination on 9/30/2003, for fraud.

(18) Defendant, Heather Gray, P.A. a professional association, was retained since about 2/2003 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.

(19) Defendant, Dickinson & Gibbons, P.A. a professional association, was retained for rendering “Honest Services” as said by Charles Denny IV, in 1/2003, 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 Society and the “Sect” and Townsend and his Children and the Beck Non-Sect at the same time from 2003-2006-now as “Alleged” to the Court and the Clients.

(20) 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 resulting from Beck/Harrod v. Townsend and Townsend ET AL v. Beck ET AL 02-03812. and Others.

(21) 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 allegedly acting within the scope of 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 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 send e-mails containing frauds and demands of his co-defendants to extort Plaintiffs up to and 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 unjust enrichment 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.

(22) Defendant, Hillsborough County Florida, operates under Florida Constitution Article VIII Section 1.(a) and per the Hillsborough Charter is to provide “Honest Services” to citizens thereof from themselves, Law Enforcers and Victims Assistance Services.

(23) 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” within the General Laws.

(24) Defendants, as Hillsborough County Sheriffs, is to operate 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 within 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 conspired to fail to provide “Honest Services” to these Plaintiffs.

(25) Defendants, as Pinellas County Sheriffs, is to operate 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 within 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”.

(26) Defendants, as Pasco County Sheriff, is to operate 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, and Co-Participants failed to **provide “Honest Services”**.

(27) 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 the Governor, FDLE, Pinellas Sheriff Coats and HCSO 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 as C.P.A.’s operating and doing its business interests from Pinellas County, Florida. With contracts for service from FBCCP and CPCS at various relevant times and intentionally failing as Janssen intentionally and knowingly produced fraudulent records to conceal illegal conduct of the “Sect and Sect Agents”.

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 but as proved herein “conspired to Fail to provide Honest Services” by frauds.

30. Defendant The Department of Financial Services alleges to operate per the Florida Constitution and General Laws to as the arm of the State provide investigations, render services and compensation to victims as Plaintiffs but have failed to provide “Honest Services”;

31. Defendant Dr. Lon Lynn, a medical doctor, operating and doing its business In Hillsborough County and knowingly 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 Officers, Baughman, Lopez, Bob Petschen (SP), Chuck Holland and others but do frauds.

33. Defendant, THE 2DCA and 5th DCA 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 conspired to fail.

34. 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 conspired to fail to provide “Honest Services” by acts of themselves and their employees.

35. 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 conspired to fail by acts of themselves, and co-participants;

36. 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 conspired to fail by acts of themselves and their employees and their co-participants led by the McKay Plot in order to violate Townsend, do fraud, conceal felonies and do racial abuse;

37. Defendant Sunbelt Equipment Sales, Inc. alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein conspired to fail to provide “Honest Services” by acts of themselves and employees named in this suit and their participants;

38. Defendant, The City of Tampa, alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein conspired to fail to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;

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

(1) Defendant Pam Bondi, Individual, At all times material hereto, is a Resident and citizen of the State of Florida, doing business in or from Leon, 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 about 11/15/01 at times “impeding” and Obstructing Justice by herself and with her 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 director, officer/agent of The State of Florida, acting within the scope of his agency for self dealings.

(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 and at relevant times used his powers to conceal criminal acts of Jeb Bush ET AL. by terminating or relocating Government agents Townsend had advised of felony acts.

(4) Mel Martinez, Individual, at all relevant times succeeded Linda Chapin as the Orange County Commission Chairperson until being appointed as Director of the U.S. Department of Housing and Urban Development serving for George W. Bush.

(5) 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.

(6) Defendant, John Harkness Individual, And 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 MacKay, 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.

(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 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 acting with malice for obstruction of justice.

(10) Defendant Toni Jennings, is a resident/citizen of the State Of Florida, doing her business in or from Orange and Leon Counties as and employee at relevant times as close friend of Linda Chapin, State Senator, Florida LT. Governor for Jeb Bush to obstruct justice.

(11) Defendant, FDLE Director, Guy Tunnell, Individual and 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.

(12) 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.

(13) 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

(14) 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.

(15) 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 “Under Color Of Law for his illicit conduct.

(16) 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.

(17) 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 until being disbarred by the Florida Supreme Court brought up on charges from the 2nd DCA, 5th DCA, Florida Bar as charges were of the same issues and nature as each attorney with her has done to plaintiffs by “ineffective services”.

(18) TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER OF FBCCP TIM JEFFERS, AS DEACON, TIM JEFFERS, AS

“Masked” FBCCP TRUSTEE (2005-present), “Sect Member”; JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE,(1995-present) OF FBCCP, JOE HOWLETT AS FINANCE COMMITTEE MEMBER 2007; “Sect Member”; MIKE SMOAK, Individually, MIKE SMOAK AS CPCS BOARD MEMBER, 1999-2007, “Sect Member”; MICHAEL JOHN CORBIN, Individually, MICHAEL JOHN CORBIN AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP,“Sect Member”; 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 MEMBER OF ALL COMMITTEES OF FBCCP AND CPCS, “Sect Member”; 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 “PACM”, “Sect 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 PERSONNEL COMMITTEE, OF FBCCP, AND AS “PACM”, “Sect Member”; ROBERT GILES, INDIVIDUALLY, ROBERT GILES, ASMEMBER OF PERSONNEL COMMITTEE, OF FBCCP; ROBERT GILES AS FBCCP DEACON, ROBERT GILES AS MEMBER OF THE CPCS SCHOOL BOARD, AND AS “PACM”, “Sect Member”; FRANK EDWARDS, INDIVIDUALLY, FRANK EDWARDS AS FBCCP FINANCE COMMITTEE MEMBER, AND AS “PACM”, “Sect Member”; MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000,

OF FBCCP; "Sect Member"; MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMATE, AS CHAIRMAN OF DEACONS, 2000-2001, OF FBCCP; "Sect Member"; 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"; DR. LON LYNN, INDIVIDUALLY, "Sect Member"; KAREN HARROD TOWNSEND, Individually, KAREN HARROD TOWNSEND AS EMPLOYEE OF CPCS/FBCCP, "Sect Member"; PAULA POWELL, Individually, PAULA POWELL AS FBCCP FINANCIAL SECRETARY EMPLOYEE, PAULA POWELL AS CPCS SCHOOL BOARD MEMBER, "Sect Member"; CARL (BUDDY) RAWLS, Individually, CARL(BUDDY) RAWLS, AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, AND DEACON, "Sect Member"; 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"; 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"; GAYLE LYNN, Individually, GAYLE LYNN, AS EMPLOYEE AS DEAN OF STUDENTS CPCS/FBCCP, "Sect Member"; APRIL BECK, Individually, APRIL BECK, AS EMPLOYEE OF CPCS/FBCCP, "Sect Member"; JIM LEAHY, Individually, JIM LEAHY AS PERSONNEL COMMITTEE CHAIRMAN OF FBCCP, JIM LEAHY AS DEACON, "Sect Member"; JOE KAREAS, Individually, AS City Tampa Police Officer; JACKIE CORBIN, Individually, JACKIE CORBIN AS CPCS SCHOOL BOARD MEMBER 2007, "Sect Member"; JOYCE MEISTER, Individually, JOYCE MEISTER, AS EMPLOYEE OF CPCS/FBCC, "Sect Member"; JACKIE HOWLETT, Individually, JACKIE HOWLETT AS CPCS SCHOOL BOARD MEMBER, JACKIE HOWLETT AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, "Sect Member"; MIKE SHAR,

Individually, "Sect Member"; DON BECK, Individually, DON BECK, "Sect Member"; JOHN COLLINSON, Individually, JOHN COLLINSON, DEACON; BILL CRAFT, Individually, BILL CRAFT, AS DEACON, BILL CRAFT AS 2007 CHAIRMAN OF THE FINANCE COMMITTEE, "Sect Member"; 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) "Sect Member"; MIKE POWELL, Individually, MIKE POWELL, AS DEACON; MIKE HOLNESS, Individually, MIKE HOLNESS; MARK JEFFERS, Individually, MARK JEFFERS; THE FIRST BAPTIST CHURCH OF CITRUS PARK BOARD OF DEACONS OF 1994- 2012; Individually, as Officers Board and as "Sect Members"; 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;

(19) DR. LON LYNN, Individually, Dr. Lon Lynn, A MEDICAL 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 Plaintiffs.

F. 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 BY FRAUD 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 PROCEEDURE 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 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 FLORIDAHILLSBOROUGH 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 2nd DCA and JUDGES OF THE 2nd DCA 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 BIRK HOLD, INDIVIDUALLY AND AS CLERK OF THE 2nd DCA, 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 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 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 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; Lori Sellers Rowe, Individually, and as State of Florida Employee; DARRYL C. CASANUEVA, Individual, Alias Honorable Justice of the 2nd DCA and “Others DOE” 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 1957 and 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 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. Jurisdiction is also found in 18 USC Chapter 13 §241 Conspiracy

against Civil Rights and §242 Deprivation of Rights Under Color of Law as what Defendants through Attorney Gibbs, Senator/Registered Agent Grant, Deputies Jeffers, Howlett and Smoak concealed illegal activities and for their own personal advantages and those of their co-participants extorted Townsend by making false Religious Society Reports, False Reports in Courts and False Reports to obtain Government Grants in order to abduct J.G.T and J.D.T from their father as extortion because Townsend has since October 1994, said to these same “Masked” officers “Show me the money trail and stop the building scheme frauds and stop lying to my family and my church. Jurisdiction and cause of action is also based on the Hobbs Act. 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”. With the Orders of Judge Canady recusing the 2DCA, 5DCA, and the Florida Supreme Court for past conduct violations of law, Plaintiffs have no other remedy at law for protection of our Federal Rights.

THE FACTS FOR THIS CONCERT OF ACTION CASE

5. Since or about the April 14, 1988, letter of Attorney David H. Popper as proof he knew of his “ineffective counsel” and his then Conspired “Concert of Action” for the protection of not exposing his malpractice, Popper began his Malum In Se malicious prejudiced Malum Prohibitum Acts to delay, fraud and thus damage his own client, Townsend a.k.a. Future Marketing to save himself. Popper gained the benefit of a naïve client being led astray while

Popper gained his employment and later partnership in the law firm of O'Neill, Chapin and thus the biased protection to protect the Respondent Superior Liability to Bruce/Linda Chapin that Bruce Chapin's Concert of Actions as exposed in his own previous malfeasance to his client Kenneth Dungey (See Dungey v. Bruce E. Chapin and O'Neil, Chapin, Marks, Liebman, Popper & Cooper CI95-1795, filed 3/13/1995 in the 9th Circuit suing Bruce Chapin for the loss of his company at the hand of the Linda Chapin's Orange County Commission controlling an Eminent Domain taking of his land to expand a school while Bruce Chapin intentionally was negligent to Mr. Dungey, Chapin's client. This same pattern of negligent "honest services" to clients is as the Concert of Actions practiced by the Chapin's and their co-conspirators in other cases and herein.

6. Plaintiff Townsend alleges and believes thus the intentional negligent services by the conspiracy of Popper, Chapin, his wife and "Others Doe" has been concealed by the Politicians listed herein and by "Others Doe" and not legally known or admitted as fact and not just "crazy" speculation by Townsend until Judge Canady disbarred Gray, recused the 2nd DCA and appointed the 5th DCA and Judge Orfinger in 2011. The discovery of the admissions by Judge Orfinger, Sawaya, and Lawson in Robinson v. Weiland, ET AL, 5D05-2380, filed **09/01/2006**, citing Townsend v. Lane 659 So. 2d 720 (Fla. 5th DCA 1995) was the first admission of criminal Political collusion involving the Ninth Circuit, 5th DCA, F.S.Ct., Governors and "Others" prior collusion in the "Elect Buddy MacKay Plot" by Popper/Chapin's as no other Florida Bar Member or ABA member would admit a violation of law by Chief Judge Powell and "Others Doe" aiding collusion by Bruce/Linda Chapin's gang to stop "discovery prior to the hearing, is required". The same Political Plot is in the 13th Circuit as Judge Crenshaw, **9/7/06**, does the MacKay/Powell Plot and bars Townsend exposing criminal acts by these same Politicians, lawyers and deputies in his Church Eminent Domain and Fraudulent use of Designated Case.

Further, until the reversal by Judge Orfinger's ruling in Townsend v. Gray proof of still ongoing collusion by Defendants and "Others DOE" could not be exposed or litigated as now herein.

Politicians still “Impede” “Discovery prior to the hearing” Townsend makes to each defendant as demanded on Lane and all Defendants and “Others” as since 1987, Townsend is by judges barred for any defense from these repeated Malicious actions began by Lane, Williams, Popper, Chapins and “Others Doe”. Further, upon Townsend being able to retrieve his over 10 boxes of business and personal records in 1993, being illegally obtained and held as ransom in the office of Charles Williams Jr. where Defendants and “Others Doe” actions were coercion, fraud, extortion, tort interference with business relations, illegal detainment, collusion for Chapin’s fraudulent legal representation to force Townsend from his legal and civil rights. This Concert of Action and up to and including Defendants named herein “by their Operational Concert of Actions” per the Criminal Enterprise MacKay and McKay Plot to keep Townsend from his legal and civil rights so not to damage the Democrat Ticket and reputation of Linda Chapin has thus damaged all Plaintiffs herein and “Others as a Class”. Further, when being fully informed by Townsend of the Chapin ET AL Concert of Action in the WTVT Television Studios in Tampa, Jeb Bush then rather than as he directly promised to provide “Honest Services” instead joined the Plot to protect and conceal Linda Chapin, for his own self dealing benefit of himself and the Republican Party with Toni Jennings, Mel Martinez , Charlie Crist and brother “George W” stopping the Feds.

7. Further, as a point Townsend affirms and believes going to showing Defendants corrupt motives as is the evidence in **THE FLORIDA BAR, v. Ellis S. RUBIN** 549 So.2d 1000(Fla. 1989) showing proof of a RICO CASE this shows Florida Bar Officers Harkness and Berry with approval of the Florida Supreme Court ordering attorney Rubin to allow the client to do a known false “narrative” in court. This is to do fraud to the jury. Defendants are approving fraud in the court to an unsuspecting jury which is condoned by the A.B.A and U.S. Supreme Court. The Public Citizens of which a jury is acquired are per the Constitutions of these United States, State of Florida and FBCCP, BLACK LAW RULES and Bar Rules are not to suspect that any member of the Judiciary is per their Oath to knowingly allow fraud to be told in any “pure” court or our Church. More now is proved in this “Concert of Conspired Actions” by these Defendants and

“Others DOE” which in this case has damaged Townsend and these Plaintiff’s for which he speaks in that only the fraudulent lies of these Defendants is told by their frauds in FBCCP Church Meetings and Records, CPCS School Records, Dr. Lon Lynn’s Doctors Records, and Lawyer Conspired Court Presentations when Townsend is prohibited by FBCCP/ Alias Trustees “masked” also as Sheriff Deputies and or with their Superior Law Enforcers and or ordered with Lawyers Gibbs, Grant and Dickinson and Gibbons, and intentional “Ineffective services of Scruggs and Gray” and “Others DOE” from even as the “Truthfully Elected” Supreme Court of the Church Leader entering his own Church/School, seeing the truthful records, and interviewing his own kids and fellow members subjected to extortion and batteries as a result of Townsend being prohibited as Popper said since March of 1987, stop talking to your business clients as this is going to be viewed as “witness tampering” and “tort interference with contracts” by Lane. In 1992 even till now if what Judge Orfinger said in 2006, “Discovery” is required as Popper ET AL should have done per the Law, the Lane/Sabal records if produced in 1/1988 or earlier as required would show Townsend should never have missed any business opportunities as Lane had no rights to any contacts he made in or about 8/7/1987 and proving RICO and Anti Trust. This same delay of the Townsend v. Beck required Discovery partially produced in 2006 became all the more reason for the RICO case now before this court as we have connected and admitted proof of these same patterns of Concert of Actions started in 1987 continue in the State Courts.

**COUNT I --REINSTATING ALL CLAIMS OF THE AMENDED
JUNE 22, 1989 COMPLAINT 89-3299, AS WRITTEN BY POPPER P.A.**

8. Comes Now Plaintiff Townsend and by reference incorporates all paragraphs, exhibits and as per the attached exhibit and included herein as a Claim for Damages.

WHEREFORE, Plaintiff prays judgement against Defendants and each of them, as follows:

1. For damages for loss of Plaintiff’s business in the sum in excess and within the jurisdictional limits of this court as determined by a jury.
2. For damages for loss of Plaintiff’s FBCCP and CPCS solvency and losses by frauds of Defendants still to be determined.
3. For costs of suits incurred in this action.

4. For punitive or exemplary damages in the amount of in excess and within the jurisdictional limits of this court as determined by a jury.
5. For arrest warrants and Writs holding Defendants to the fullest extent of the law.
6. For other and further relief as the Court may deem proper.

COUNT II---FOR MALICIOUS PROSECUTION

9. Comes Now, Plaintiff Randall Townsend and alleges; at relevant times operates via P.O. Box 21, Odessa, Hillsborough/Pasco Counties, Florida, 33556 and includes herein all Paragraphs 1-all and all exhibits and states:

10. Defendant(s) reside respectively at:
- (a) Charles E. Lane Jr. at 246 N. Mounts Bay Court, Longwood, Fl 32779 and 640 Douglas Avenue Suite 1504 Altamonte Springs, Florida 32714
 - (b) Sabal Marketing Inc via Registered Agent Corporation Information Services Inc. 1201 Hays Street Tallahassee, Florida 32301
 - (c) Sabal Marketing President, Director Charles E. Lane Jr. 246 N. Mounts Bay Court, Longwood, Fl 32779
 - (d) Sabal Marketing Secretary, Mary F. Lane 246 N. Mounts Bay Court, Longwood, Florida 32779
 - (e) Charles E. Williams, Jr. Esquire, "Of Counsel", currently doing business from 100 N. Tampa Street, Suite 3350, Tampa, (Hillsborough County) Florida 33602-5832.
 - (f) David Harry Popper, Esquire, "Of Counsel", currently doing business from 1000 Legion Place, Suite 1200, Orlando, (Orange County) Florida 32801
 - (g) Bruce E. Chapin, Esquire, 200 East Robinson St. Suite 865, Orlando, Fl, 32801
 - (h) O'Neill, Chapin, Marks, Liebman, P.A. 200 East Robinson St. Suite 865, Orlando, Fl, Orange County 32801
 - (i) Ron Beck, Karen Harrod Townsend, Charles Scruggs, Mark Ober, Judge Raul Palomino, Joe Howlett, Tim Jeffers, David Gee, James Coats, Jeb Bush, Charlie Crist, Individually, and in and by their assisted Concert Of Actions;
 - (j) AND Plaintiff is ignorant of OTHERS DOE TO BE ADDED UPON DISCOVERY:

11. On July 28, 1989, defendants commenced a counterclaim civil action against plaintiff Townsend a.k.a. Future Marketing for Breach of Contract, Tort Interference with Contracts, in the Eighteenth Circuit Court of Seminole County Florida claiming loss of commissions as damages. Service was to David H. Popper by U.S. Mail on 7/28/89.

12. Popper would never explain, challenge or admit his failure to use and file for Default against the Counterclaim which had been served 6/22/1989, by U.S. Mail to Charles Williams Jr.

13. In January 1993, a coerced settlement under duress and extortion in that action was rendered in favor of plaintiff to recover of defendant \$7,500.00. Which in violation of the Attorney/Client Townsend Agreement and Trust Fund violations Chapin and Popper unlawfully

withheld \$2,500.00 at which time Townsend timely notified the court of Judge Rom Powell and the Florida Bar and other authorities of the collusion to no avail.

14. The mentioned action was commenced and prosecuted by defendants maliciously and without probable cause, in that:

A. “Under color of Law” Conspirator Williams as an Agent of the State as a Florida Bar Member in collusion with his client Charles E. Lane Jr and David H. Popper knowingly as per the similar case **Florida Bar v. RUBIN** Id., filed a Counter Suit as Malicious Prosecution for delay and to “impede the Contract and civil Rights of Townsend” and to conceal defendants criminal acts and malfeasance to not let Townsend discover his legal and financial and civil rights deprivations or sill in 2012 be allowed to present his claims and defenses to a jury.

B. Fraud was exposed as when the Judge Powell order for Defendants in 1992, to produce only partial discovery of the Contracts listed in the Contract, Lane had no standing to his claims of contracts with the Lines and Accounts as Lane offered to Townsend/Future Marketing on August 7, 1987 and further the benefits Townsend earned for the Brokerage Agreement were partially exposed and still not per the contract compensated.

C. The Tort Interference and unjust enrichment by Lane and Defendants was exposed.

D. In addition, testimony had been confirmed of Lane and Williams use of illegal substances and thus money due Townsend had been diverted for their illegal uses.

E. Thus the Case, Townsend v. Lane 659 So2d 720 (1995) 5D-94-1913 September 1, 1995 PCA A Rule 1.540(b)(3) Motion must specify the fraud and explain why the fraud, if it exists, would entitle the movant to have the judgement set aside;...(Because the appellant did not specifically plead the two grounds that would have formed a basis for relief---fraud and coercion—the trial court correctly dismissed the petition for failure to state a cause of action. Now by the ruling of Judge Orfinger in 2011, is proved with Judge Powell ET AL as a co-participant to delay and extort Townsend and those for whom he speaks since 1987.

15. Plaintiff Townsend includes and incorporates all paragraphs 1 through all below by reference and reserves the right to expose additional violations after discovery is lawfully allowed to show these defendants obstruction, criminal acts and collusion to deprive Townsend and Townsend ET AL of our Contract, Civil and Assemble Rights to our persons and our property by “Hate Crimes” depriving Plaintiffs of a Religious Society our Free Assembly, Parent Child Relations and our property up to and showing their hypocritical acts of willful and knowing George W. Bush allegedly for protection of these Plaintiffs same type rights fights the Iraq War.

16. As a proximate result of the wrongful acts alleged in this Complaint, Plaintiff’s have and are being generally damaged in excess of and within the jurisdictional limits of this court and not able to be tabulated until lawful discovery is allowed as to show cause for general damages and special damages and punitive damages and states per written papers filed by Chapin to the Judge Powell commission damages just to Townsend at that time were in excess of about \$1 Million.

17. Further, Attached as Exhibit is the Florida Bar July 22, 1993 report of Cathy Cline to John B. Root, Jr. showing legal and discovery questions and claims made and delayed answers still not given per the collusion of defendants and “Others DOE” until the discovery of the Judge Orfinger and F.S.Ct. Judge Canady rulings from 2011, clarifying only part of still many questions left unanswered because of “the collusion to impede discovery” as extrinsic fraud to prevent Plaintiffs from presenting our full case in an Honorable Court to a jury per our Florida Constitutional Article I. Section 3 Right ignored by defendants and “others DOE” to be all added herein when possible to know them.

18. Further, by collusion of these Defendants and “others DOE” even after the March 15, 2007, Status Hearing and Townsend meeting what he believed was the directive of Federal Judge James Moody, Jr. to per the Federal Rules ordering “Be more specific” on each Defendant, Judge Merryday who having heard the same pattern of facts as known herein were done in his hearing the Aisenberg v. Hillsborough County Sheriffs Case reverses himself, shows his bias and dismisses the case only to have the 11th Circuit Court of Appeals rule “Ineffective Counsel” and

thus since the Townsend v. Gray Case herein was and is still pending, Townsend included the findings of the 11th Circuit Court Of Appeals connecting the patterns of Defendants Gray was to litigate for their “Ineffective Services” as the same for with these same courts (2nd, 5th, Florida Bar and F.S.Ct. disbar Gray, but choose to conceal her acts against these Plaintiffs and these deprivations Canady later in 2011 admits and recuses these same courts and persons for their prior conspiracy acts still ongoing in 2012, by these connected persons in and of the State of Florida and U.S. Government and “Others DOE”

19. The reasonable value of Plaintiff’s business immediately prior to the wrongful acts by Defendants in 1987 herein alleged was per the writings of David Landis and David Popper in excess of \$50,000. And Defendants, and each of them, did the things herein alleged oppressively and maliciously, and Plaintiff is entitled to punitive or exemplary damages in the sum of in excess of \$100 Million as expressed by experts in the field of jury verdicts.

20. In Continuation Defendants Ronald Beck and Karen Harrod Townsend in concert of the actions for themselves and their co-defendants “DOE” knowingly and intentional on 11/2/01, filed “Sham” Affidavits and on 11/15/2001, affirmed the “Sham” Charges under oath in the court of Judge Raul Palomino and sought for fraud an Injunction against Randall Townsend as for one reason for deception to prevent this father from attending a Church function for his children at Word Of Life Bible College in Hudson, Florida where J.D.T. then over the age of minority was attending college and Randall Townsend frequently visited the campus taking J.D.T. and is dorm mates Pizza and various supplies. Defendant did their concert of actions for retaliation and to conceal the criminal acts of Defendants as Defendants to church members and “others” were for defamation making claims this father was dangerous with guns, potentially violent and had abused and molested his children J.G.T. and J.D.T. On a regular basis on and since 9/8/1999, Defendants obtained the illegal services of FBCCP Officers also Sheriff Deputies Jeffers, Howlett, Corbin, Smoak and “other” to detain and impede Townsend from his children in

Hillsborough County however in Pasco County at Word of Life, Defendants needed illegal means by the frauds of “Sham” charges and the illegal “intentionally” ineffective services of Townsend’s Attorney Charles Scruggs P.A. to assist Deputies Howlett and Smoak continuation of their criminal acts using the willful cooperation of the State Attorney Ober and his officer and “others” of the Victims Assistance Program and “others DOE”.

21. Plaintiff is informed and believes and alleges that each of the named and fictitiously named defendants is responsible as for the occurrences and injuries alleged herein.

22. On November 2, 2001, defendants instituted civil actions against plaintiff in the 13th Circuit of Hillsborough County, Florida. The actions, defendants jointly alleged are “Stalking”, “Sending unsolicited fax’s to me (Beck), others on pastoral staff and church members in general. Statements are lies, inflammatory and accusational. The Deacons are very concerned.” “Violence” and sought Restraining Orders and in these acts and by other malicious acts sought the “Concealment of Defendants Criminal Acts and Frauds”, Embezzlement, Child Endangerment, “Unlawful detainment”, “Impeding Religious Rights”, “Impeding Contract Rights”, “Unlawful Impeding Child Custody”, Illegal Trespassing, Arrest and Contempt of Court as Defamation in a False Public Light and fines against Randall Townsend in violation of Member Townsend being proved following the FBCCP 1993 By-Laws and his Officer Duties as elected 100% by the FBCCP Membership since 1993. The Actions were titled Ronald Beck v. Randy Townsend REPEAT VIOLENCE NO: 15-813 and Karen Townsend v. Randy Townsend DOMESTIC VIOLENCE NO: 15-814. A copy of the complaint filed in the actions is attached as Exhibits and incorporated by reference. And Divorce Case 02-4974, conspired for judges control.

23. On November 15, 2001, Attorney Scruggs in collusion with Defendants “Doe” ignored a 11/12/01 Faxed letter as a demand of his Client Townsend to Subpoena Church records so to show the embezzlement and malicious criminal acts as later revealed in 2006 and instead Scruggs as he admits intentionally betrayed Townsend and “others” so not reveal the frauds and Malicious Prosecution scheme of defendants Scruggs intentionally and willfully was aiding and abetting

with Judge Raul Palomino, while they admonished Defendants not to interfere with child custody and dismissed all the actions against Plaintiff Townsend herein trying to conceal the McKay Plot.

24. Defendants acted without probable cause in bringing the above-mentioned actions, in that any all defendants did not honestly and reasonable believe that there were valid grounds for the actions since: (1) The FBCCP By-Laws specifically prohibited their actions of bring the suits; (2) The FBCCP Business Meeting Quarterly and Annual Reports, FBCCP and CPCS Committee Reports, The Earle Property 18005 Gunn Highway Acquisition and Contracts for Purchase Reports, The Eminent Domain 7705 Gunn Highway Litigation evidence, Years of Zoning and Building Permit Case evidence, their By-Laws violations and Criminal Acts of which Townsend was and is still investigating and complaining in continuance of his 1993 By-Laws and Fiduciary and “Clean Hands” Citizen Duties; (3) Florida Law and Florida Bar Black Law Rules Prohibited these Florida Bar and or as “Others DOE” as Government Agents Acts; (4). Later revealed documents Defendants and “others Doe” still try to conceal but known only to themselves at the relevant times reveal multiple and ongoing criminal acts lasting since about 1993 and before.

25. Defendants and “others DOE” acted maliciously in bringing the mentioned actions against plaintiff, in that in concert of actions as admitted by the judges as defendants herein:

A. They extort and abuse innocent children, they Impede Civil Rights, Contract Rights and “impede the law” and Plaintiff’s investigation of Contract(s) violations and “Due and Equal Process” as they obey Exparte for Extrinsic Fraud Operational Orders of their Co-Conspirators;

B. They falsify records and claims concealing “unjust enrichment” to themselves and to others including their “Government Agents and Supervisors” as per the Harkness/ Rubin Scheme;

C. They destroy and impede production of true records and testimony as in Rubin;

D. They immune themselves and ignore the Florida Constitution, The FBCCP By-Laws, The Florida Bar Rules, The Florida Bar Black Law Rules, U.S. and Florida Case Law, Florida and U.S. Rules of Civil Procedure, Florida Election Laws, Florida Labor Laws, I.R.S. Tax Laws,

and intent of the Florida Citizens Vote or the Fraudulent liberties taken by judges to conceal illegal conduct of themselves using Per Curium Affirmed as in **Jenkins v. State of Florida** ignoring the R.O.C.P. 1.540 Motions and New Cases timely filed by Townsend and using these judges, lawyers, A.G. Agents, FDLE Agents, State Attorney Agents, Sheriffs and Sheriffs Deputies, Orlando and Hillsborough County Commissioners and Elected Officers and “Others” and rewarding them Quid Pro Quo to continue their Concert of Action for their MacKay/Chapin/Chiles/Harkness/Berry/Bush(s)/Crist/Jennings/Ober/Gee/Terry/Coats/Scruggs/Gray/Rowe/Bondi/Scott and Others Named herein and “Others Doe” Criminal Enterprise.

E. They impose legal fees, costs and fines (\$924.00 by Crenshaw) dismiss cases as extortion to conceal their unlawful obtaining of property and children against Townsend for requesting documents that as a member of FBCCP are per the By-Laws to be made available and open at all times and as admitted Defendants use fraudulent FBCCP Horgan C.P.A. documents ;

F. They abduct J.D.T and J.G.T and do frauds to “others” and in the process threaten as these minor children the day of their October 20, 1999, abduction proving their extortion wrote,

“Dad Please don’t be mad at us! I don’t know what other option I/we have. It’s not fair just not 2 C mome either! In ways we’ll C U soon & we’ll give u a call later! OK?...Heart Jen”

but then Defendants and “others Doe” prohibit the kids contacts by phone or personal visits with their father since 09/08/1999, even ignoring warnings from Judge Palomino on the record in 11/15/2001, the Orders of Judge Timmerman in 2003, the ruling of Judge Crenshaw in 2006, or now even in or after the admissions of Florida Supreme Court Judge Charles Canady in 2011. Defendants in 2012, continue to make these threats of arresting this father for trying to contact his children and to even take their depositions from 1999 till now or even in December 2005 after the mother Karen Harrod Townsend in an Affidavit to Judge Holder admitted her and the Defendants conspired criminal acts and false allegations still damaging in Public Light this father is prohibiting the Parent/Child/Religious Church Member Civil Rights Relationships.

G. Defendants have in a Concert of Acts since 1987 by Lane ET AL and willfully joined

since 1988 by Popper ET AL and Williams ET AL and since 1989 willfully joined by Chapin ET AL, Judges and “others DOE” and Gibbs, ET AL in 1991 and before done;

1. Conspired premeditated RICO acts and Anti Trust Acts,

2. Defrauded to collect payments for honest legal services defendants never intended to provide;

3. collusion to impede due process in Florida Bar Complaints and legal cases to conceal illegal activity of government persons and “others Doe” to prevent a “jury trial” as per the Constitutional Rights Granted in Florida Constitution Article I. Section 3, and Rights per the U.S. Constitution and U.S.C. Codes by their actions in cases listed above and included herein:

4. collusion by and with Non Members as a “Sect” of FBCCP including allegedly elected officers but as “Masked” Trustees/Sheriff Deputies Jeffers and Howlett and other “Government Agent/Officers” torts;

5. defamation that Townsend was “an infidel”, “illegally acting”, “dangerous with guns”, “violent”, “potentially violent”, “abusive of his wife and kids” in church and Townsend’s place of employment (Kmart) by Dr. Rowe and her relative Lori Sellers Rowe to get Townsend terminated to conceal his investigations of her Federal Law violations ongoing in the store;

6. Doctor confirmed physical, emotional and mental abuses, multiple batteries,

7. spousal batteries, illegally obtaining prescription drugs and attempted murder by a firearm,

8. invaded privacy into Church matters by non-member deputies/Senators,

9. impeded due process in courts of law and in FBCCP/CPCS Daily Operations and Business Meetings as Judge Crenshaw did not do 9/7/2006 as Judge Orfinger 9/1/2006, wrote.

10. Conspired using the media of the Tampa Tribune and the St Petersburg Times (Now the Tampa Bay Times) to put Defendants and “Others DOE” in a positive false public light to defame Townsend’s claims in a negative public light to the FBCCP Members and “others”.

11. caused bank frauds, caused by frauds employment, Grants and economic loss.

26. In view of defendants' willful and malicious actions towards plaintiff, plaintiff is entitled to recover punitive damages, in the amount exceeding the jurisdictional minimums of this court and yet unknown per a jury verdict.

27. As a proximate result of defendants bringing the above-mentioned action against Plaintiff, plaintiff has been damaged in the sum not yet know but exceeds the jurisdictional minimums of this court and yet unknown per a jury verdict.

28. As a further proximate result of the actions initiated by defendants, plaintiff incurred costs in the sum of exceeding estimates of \$20,000, and the sum of exceeding \$45,000.00 as attorney's fees in defending against the actions.

Wherefore, plaintiff request judgement against defendants and "others Doe" and each of them for:

1. Compensatory damages in the sum yet to be determined
2. Punitive damages in the sum yet to be determined by a jury.
3. Costs of suit; and
4. Such other relief as this court deems proper.

**COUNT III PETITION---FOR WRIT of Mandamus—
To compel recognition of petitioner's election to the FBCCP governing board**

29. Petitioner, Randall Townsend, is, at all times mentioned was, residing at 18005 Lindawoods Street, Odessa, Hillsborough County Florida.

30. Respondent, FBCCP, is, and at all times mentioned was, a religious society incorporated under the laws of the State of Florida, with its church and principle place of office located at 7705 N. Gunn Highway, Tampa, Hillsborough County Florida 33625.

31. Respondents, Tim Jeffers, Geoff Smith, Joe Howlett and David Ferguson, are, and at all times mentioned were or claim to be members of respondent church's governing board residing in Odessa, Tampa, of Pasco and Hillsborough Counties Florida.

32. Pursuant to the FBCCP Constitution and Bylaws or as the case may be of respondent church, petitioner, in 1993 and specifically in 1994, was duly elected and qualified as a member of respondent church's governing board. By reason of this election and petitioner's acceptance of this office, petitioner was, and still is, entitled to serve as a director/member of respondent

church's governing board and to participate in the management and control of the assets and property of respondent church. A copy of the FBCCP bylaws is attached, marked Exhibit and incorporated by reference.

33. Petitioner is, and has at all times been, ready, willing, and able to carry out and perform the duties of his office, and to comply with all necessary conditions, previous, and regulations by the bylaws of respondent church.

34. On or about 9/8/1999, at a special meeting with pastors and Gary Leatherman at the time Trustee, respondent directors ignored Townsend's Demands since about 1994, (1) Show me the money trial, (2) Stop the Building Scheme (Eminent Domain) Frauds, (3) Stop lying to and extorting my family, but instead voted to expel petitioner from his offices and subsequently refused to allow petitioner to participate in the FBCCP meetings and did defamation so to cause Townsend the loss since 10/20/1999 free assembly with his children for whom he tries to protect and speak. Since that time respondents have continued to deprive petitioner of his offices and members of our rights.

35. The attempted expulsion of petitioner as Nominations Supreme Court Officer and LRPC Chairman is in direct violation of the bylaws of respondent church and it is ineffective and void.

36. Petitioner has expressly demanded that respondents recognize his rights and his fellow non-sect members rights and Corporations rights but this demand is still refused by defendants.

37. Petitioner has no adequate remedy at law and will suffer irreparable harm unless the relief requested in the petition is granted.

Wherefore, petitioner request;

1. Issuance of an alternative writ of mandamus commanding respondents, and each of them, to recognize petitioner as a director and member of respondent church, or to show cause why petitioner should not be so recognized and why a peremptory writ should not issue.
2. On return of the alternative writ and the hearing of this application, issuance of a peremptory writ of mandamus commanding respondents, and each of them to recognize petitioner as a director/member of respondent church.
3. Costs of this proceeding.
4. Such other and further relief as the court deems just and proper.

COUNT IV --FOR UNJUST ENRICHMENT

38. 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).

39. 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.

40. 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 V—CLAIM FOR ACCOUNTINGS AND
DISCOVERY OF RECORDS REGARDING CERTAIN MONIES DUE AND
OWING PLAINTIFFS TAKEN BY LARCENY AND FRAUD**

41. 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.

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

43. The relationship(s) created between Plaintiffs and Defendants, by virtue of their By-Laws and

Contracts constitutes Plaintiffs Rights of an Accounting(s).

44. Plaintiffs has a right to an accounting of the monies collected by Defendants, since 1987, pursuant to the FBCCP By-Laws and Sabal and Sunbelt Contracts in that the monies are Plaintiffs Property and Plaintiffs assert their belief of Quid Pro Quo actions.

45. 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.

46. Plaintiffs has no adequate remedy at law.

47. 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. Employees, 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 the 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 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 VI-- RACKETEERING

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

49. 18 USC 1961, affords certain civil remedies to persons harmed by racketeering activities. The Plaintiffs seek all forms of relief afforded them under the Federal "RICO ACT".

50. The multiple illicit "predicate acts" of racketeering engaged in by Defendants include but are not necessarily limited to: extortion; Political Frauds, Frauds, Witness Tampering, interference with commerce; Bank Frauds to obtain loans; Government Frauds to obtain Grants; 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; 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.

51. 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 legally aid and abet Townsend and other Plaintiffs.

52. Further, all of the Defendants have conspired to: interfere with commerce by obstructing Townsend since 1987, from his clients and customers 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.

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

54. 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 Political powers, the racketeering enterprises and in Quid Pro Quo acts done 18 U.S.C. 1957 acts.

55. 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 MacKay Plan and McKay 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.

56. 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 VII—ANTI-TRUST

57. Plaintiffs adopt and include herein the foregoing facts/omissions in Paragraphs 1-all, attached exhibits and requests Judicial Notice of all cases be into this count, alleges and believes:

58. 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 later which Defendants conspire to “impede”.

59. 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.

60. 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 MacKay;

C. Aiding and Abetting the frauds of Bush(s), 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 including Presidential Elections of 2000, 2004 and 2008;

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 and federal 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.

61. 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.

62. 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 even depriving Religious Rights.

63. 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 seek immediate WRITS OF: MANDAMUS; HABEAUS CORPUS; PROHIBITION; AND RESTITUTION AND ARREST WARRANTS FOR DEFENDANTS PER FURTHER CASES AFFIRMING CLAIMS AND BELIEFS OF PLAINTIFFS:
TOWNSEND v TEAGLE 467 So2d 772, 1985; McNULTY v HURLEY 97 So2d 185, 1957, Fla Sct. 1357; LaTORRE v FIRST BAPTIST CHURCH OF OJUS 498 So2d 455, 1986;
HEMPHILL v. ZION HOPE PRIMITIVE BAPTIST 447, So2d 976, 1984; COVINGTON v. BOWERS 442 So2d 1068, 1983; FIRST INDEPENDENT MISS. BAPTIST CHURCH v.

McMILLAN 153 So2d 337, 1963; DOE v. EVANS 814 So2d 370, Fla. SCt. 94450 (Fla. 2002)
MALICKI v. DOE 814 So2d 347, Fla SCt. 2002; DOE v. DORSEY 683 So2d 614, 617
(Fla. 5th DCA 1996); HUNTER v. FIRST BAPTIST CHURCH INC. 294 So2d 355,
1974; LaGORCE COUNTRY CLUB v. CERAMI 74 So2d 95, 1954, Fla SCt. 1307;
LLOYD v HINES 474 So2d 376, 1985; TSAVARIS v. CHARLES H. SCRUGGS, III
360 So2d 745, 1977 Fla. SCt 1609; *Board of County Com'rs v. Charles H. Scruggs, III* 545
So2d 910, 1989; *UMBERGER v. JOHNS* 363 So. 2d 63, 1978; *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.”

Yet 5th DCA Judges Orginger, Lawson and Sawaya as now confirmed by their ruling in **Robinson v. Weiland, ET AL**, and; Chief Justice Canady recusing himself, the 2nd DCA, 5th DCA, The F.S.Ct and “others” and empowered per F.S.Ct 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”; **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.

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, The U.S. Code, 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 done 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 the 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 19th day of June, 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
FOR "ALL" PLAINTIFFS Jfyrt59@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 ____ DAY OF _____, 2012,
BY ID PRODUCED _____

NOTARY PUBLIC: _____