

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT**

**IN AND FOR ORANGE COUNTY, FLORIDA**

**GENERAL CIVIL DIVISION**

**Randall Townsend**

**v.**

**Charles E. Lane, Jr., d/b/a**

**SABAL MARKETING**

**CASE NO. CI89-3299**

**From 18<sup>th</sup> Circuit Court Case NO: CI 88-2554-CA-03-08**

**MOTION FOR R.O.C.P 1.540(b)(4) and (5) HEARING**

**AND MOTION TO ADD DEFENDANTS INCLUDING THE**

**SEMINOLE COUNTY FLORIDA CLERK OF THE COURT**

**PER ONGOING RELATED CASES:**

<b>RANDALL C. TOWNSEND,</b>	<b>)</b>	<b>CONCERT OF ACTION</b>
<b>Individually, and as F.S. §617.0834,</b>	<b>)</b>	<b>FEDERAL RICO AND TORT</b>
<b>“Representative” As on behalf of all</b>	<b>)</b>	<b>VIOLATIONS OF RELIGIOUS</b>
<b>other society members “non sect”</b>	<b>)</b>	<b>RIGHTS CLAIMS</b>
<b>as the rightful shareholders of The</b>	<b>)</b>	<b>DEMAND FOR JURY TRIAL</b>
<b>First Baptist Church of Citrus Park</b>	<b>)</b>	<b>DEMAND FOR CLASS ACTION</b>
<b>and Citrus Park Christian School</b>	<b>)</b>	<b>DEMAND FOR WRITS OF:</b>
<b>AND AS “NEXT FRIEND” AND</b>	<b>)</b>	<b>MANDAMUS</b>
<b>PATERNAL PARENT OF MINOR</b>	<b>)</b>	<b>HABEAUS CORPUS;</b>
<b>SON, J.D.T. and Daughter J.G.T.</b>	<b>)</b>	<b>PROHIBITION;</b>
<b>AND AS A DIRECT MEMBERS</b>	<b>)</b>	<b>RESTITUTION PER</b>

AS (FBCCP) AND	)	FLA.R.CIV.P. 1.380(c)
AS "NEXT FRIEND" AS "DOE"	)	
AS ALL MINOR CHILDREN AND	)	INJUNCTIVE RELIEF and
"OTHERS" AS "DOE" OF	)	BENCH WARRANTS
And For Plaintiff THE "NOT FOR	)	Demands.
PROFIT" CORPORATION	)	Tampa Middle District
KNOWN AS FIRST BAPTIST	)	Related CASE NO:
CHURCH OF CITRUS PARK,	)	8:06-CV2050T-30-TGW
(FBCCP) AND CITRUS PARK	)	[Townsend ET AL v. Beck ET AL]
CHRISTIAN SCHOOL, INC.	)	11th Cir. 08-10721-A
(CPCS) and as All Members of	)	as Florida State Courts:
the Citizens "Classes" ET AL	)	SC11-1042
Plaintiffs/Respondents	)	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-  
2002-2003-2004-2005-2006-2013; 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:**

<b>CHARLES H. SCRUGGS III.,</b>	<b>CIRCUIT CASE NO. 05-0911</b>
<b>Individually,</b>	<b>DIVISION G</b>
<b>CHARLES H. SCRUGGS, III. ESQUIRE,</b>	<b>APPEALS CASE:2D06-2811</b>

**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**

**STEVEN TYLER HARROD, Individually,**

**FROM CASE NO: 01-15814 and**

**DONALD HARROD, Individually,**

**related CASE NO:01-15813 and**

**NORMA HARROD, Individually,**

**02-03812**

**JOHN A. GRANT, JR. Individually,**

**JOHN A. GRANT, JR. AS REGISTERED AGENT**

**OF FBCCP/CPCS CORPORATION, JOHN A.**

**GRANT, JR. Attorney at Law, JOHN GRANT**

**AS NOW FORMER STATE OF FLORIDA SENATOR**

**DUANE JANSSEN, Individually, and DUANE JANSSEN**

**AS C.P.A. and DUANE JANSSEN AS C.P.A. for**

**JANSSEN & HORGAN as NOW JANSSEN & IGOR**

**C.P.A., P.A. JANSSEN & IGOR. (Formerly Janssen**

**& Horgan) C.P.A.'s, P.A. a Florida Corporation**

**UTICA INSURANCE COMPANY OF NEW YORK,**

**CHARLES DENNY, IV, Individually, CHARLES**

**DENNY, IV, AS ATTORNEY AT**

**LAW FOR THE FIRM OF DICKINSON & GIBBONS P.A.,**

**THE LAW FIRM OF DICKINSON & GIBBONS, P.A. ATTORNEYS AT LAW,  
A. JAMES ROLFES, Individual, A. JAMES ROLFES, AS ATTORNEY AT  
LAW, A. JAMES ROLFES, AS ATTORNEY OF THE LAW FIRM OF  
DICKINSON & GIBBONS, P.A. ATTORNEYS AT LAW,  
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, AS HCSO DEPUTY JOHN McDARBY, Individually, John McDARBY, JAMES (JIM) COATS, Individually, JIM COATS AS SHERIFF OF PINELLAS COUNTY FLORIDA; EVERETT RICE, Individually, EVERETT RICE, AS FORMER SHERIFF OF PINELLAS COUNTY, BOB GUALTIERI, Current Sheriff 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 BIRK HOLD, 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. SEALANE 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 and ELEVENTH CIRCUIT COURT OF  
APPEALS SITTING JUDGE ET AL from about 1991-now; FEDERAL JUDGE  
ELIZABETH KOVACHEVICH, Individually, and as FEDERAL JUDGE TAMPA  
MIDDLE DISTRICT, FLORIDA; 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; PATRICIA McCARTHY, Individually,  
PATRICIA McCARTHY, P.A., PATRICIA McCARTHY OF THE STATES  
ATTORNEY’S OFFICE, ROBERT O’NEILL, Individually, ROBERT O’NEILL,  
AS OF THE DOJ AND U.S. ATTORNEY’S OFFICE; Seminole County Clerk  
MaryAnne Morse ET AL and said Morse Agents in 1989 and through current  
times; and “OTHERS DOE”, as any yet unknown accomplice to the acts of  
defendants herein;  
AS DEFENDANTS**

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**COMES NOW, RANDALL C. TOWNSEND, PRO SE, AND FILES FOR:**

**A. Transfer of Case TOWNSEND ET AL V. GRAY ET AL and all related consolidated cases from the UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT, Docket #12-13892 from L.T. CASE NO: 8:12-CV-1198-T-17EAS;**

**B. THIS MOTION FOR R.O.C.P 1.540(b)(3), (4), (5), HEARING FOR AND FROM CASE;**

**Randall Townsend v. Charles E. Lane, Jr., d/b/a SABAL MARKETING, CASE NO. CI 88-2554-CA-03-08, IN THE CIRCUIT COURT OF THE 18th JUDICIAL CIRCUIT IN AND FOR SEMINOLE COUNTY FLORIDA AND AS illegally retained a “Void” Order of Joint Stipulation for Transfer and or by fraud and transferred said case and conspiracy of Lane ET AL extortion and frauds and other illegal actions as CI89-3299 IN THE CIRCUIT COURT OF THE 9<sup>TH</sup> JUDICIAL CIRCUIT IN AND FOR ORANGE COUNTY FLORIDA;**

**C. AND TO ADD: COMPLAINT COUNTS FOR VARIOUS CONSPIRACY and Frauds exposed by the 5<sup>th</sup> DCA ruling for Townsend in ROBINSON V. WEILAND 5D05-2380 confirming and exposing the illegal actions exposed to 9<sup>th</sup> Circuit Chief Judge Rom Powell prior to his FINAL JUDGEMENT ORDER OF 8/19/1994, for himself and his superior employer(s) as the Florida**

**Supreme Court, Florida Bar and Linda Chapin as the wife of Townsend ET AL's Counsel Bruce E. Chapin and Townsend's own then terminated counsels and "Others" as his new Respondent Superior as or of the Orange County Commission including Mel Martinez and his Superior as then gained employ at the will of or by President George W. Bush as a gain of influence for his brother Florida Governor Jeb Bush ET AL and "Others" including the Federal Agents of the Department Of Justice ET AL (DOJ, FBI, STATE Attorneys, U.S. Attorneys, Federal Judges named herein and "Others DOE") and Internal Revenue Service (IRS) and Housing and Urban Development (HUD) gaining favor, bias and influence from or by not exposing criminal acts of Lane ET AL as Townsend whistle blower tries still to expose as their acts criminally ongoing personal gain and political gains even Quid Pro Quo gains and influence and from financial contributions from LANE ET AL and those for whom he bribed and bribes to conceal their criminal acts including Publix Supermarkets Inc. ET AL (Charles Lane Sr. and Edward Crenshaw and "Others") and JP Morgan ET AL (Mel Martinez and Steven T. Harrod) showed as violations of various Civil Rights ACTS and Civil Rights and the HOBBS ACT 18 USC 1951 and Election Laws as Public Officials Corruptions for extortion and as intrinsic frauds, Frauds on the Court as revealed in the recent**

**rulings of: the Clerks of the Seminole County 18<sup>th</sup> Circuit; EN BANC (2008 and 2013) rulings of the 11<sup>th</sup> Circuit Court of Appeals; The United States Middle District, Tampa, Judges (Judge James Moody Jr. 2007 and others through 2012), The Florida Supreme Court through 2012, even including the “Check Mate” admissions of illegal acts by Chief Judge Charles Canady recusing himself and lower alleged “alias” honorable justices and law enforcers under his care and supervision admitting defendants violations of law as stated in Salinas v. U.S. 522 at 65, 118 S.Ct. at 477, 139 L. Ed 2d at 362 “A conspirator must intend to further an endeavor which, if completed, would satisfy all of the elements of a substantive criminal offense, but it suffices that he adopt the goal of furthering or facilitating the criminal endeavor. He may do so in a number of ways short of agreeing to undertake all of the acts/omissions necessary for the crime’s completion” and additionally Levine v. United States 362 U.S. 610, 80 S.Ct. 1038 (1960) citing Offut v. United states 348, U.S. 11, 14, 75 S.Ct. 11,13,(1954) “A judge receiving a bribe from an interested party over which he is presiding, does not give the appearance of justice.” “Recusal under Section 455 is self-executing; a party need not file affidavits in support of recusal and the judge is obligated to recuse herself sua sponte under the stated circumstances as proofs of law per Bulloch v. United States, 763**

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

**D. and now herein again makes Requests for Discovery as exposing illegal Abuses of Process of all Lane ET AL Defendants and as PLAINTIFF ALLEGES:**

1. Plaintiff/Counter Defendant/Respondent(s) Randall C. Townsend, (RCT): individual; formerly a.k.a as Future Marketing (Future) a Food Broker/Manufacture Representative business at P.O. Box 21, Odessa, Hillsborough County, Florida 33556; and RCT as a F.S. 493, Florida Security Officer (8/1999-2001); and RCT as on behalf of the Florida Corporation known as First Baptist Church of Citrus Park (FBCCP) (FEI number 591268217) and Citrus Park Christian School (CPCS) of 7705 Gunn Highway, Tampa, Hillsborough County, Florida 33625, as RCT is Unanimously Elected per Florida Statues 617.0834, “Representative” per F.S. 617.022(2)(b) 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...” thereby RCT

as elected also serving “members in a representative suit” as Officer as authorized Member of the Nominations Committee (Church Supreme Court per the By-Laws) and Long Range Planning Committee Chairman since 1994 and for all other FBCCP/CPCS Corporation Members as Plaintiff victims speaks per Florida Constitution Article 1. Section 3. Religious Society per First Free Will Baptist v. Franklin, ET AL. 4 So.2d 390, 148 Fla. 277, Exposing “fraud, collusion and arbitrariness” against the Defendants and those of the “Sect and Sect Agents” as thereof victimizing us the rightful shareholders of the FBCCP/CPCS Florida Corporation “Not For Profit”; and specifically as “Next Friend” Paternal Parent of FBCCP/CPCS Members J.D.T and J.G.T. and as a Direct Member(s) per the FBCCP BY-LAWS of 1993; and Representative RCT for or as “Others DOE” of the Class of Members of the Citizens “Classes” as “Father/Parent Class” and as “Religious Society Class” and as a “Florida Tax Payers Class” as Plaintiffs per F.S. 454.18 and per F.S.120.69(1)(b)(c) Administrative Procedure Act per our Whistle Blower Rights like others similarly situated seeking permanent equitable relief per our F.S.817.02 (Obtaining property by false personation) law from these fraudulent Under Color of Law self-dealing Defendants, and RCT for “Others DOE” per F.S. 777, PRINCIPAL; ACCESSORY; ATTEMPT; SOLICITATION; CONSPIRACY and Florida Constitution: Article I. Section 3 Religious Freedom (“Fraud, Collusion, And Arbitrariness...”) aiding a “Sect and Sect Agents” Under Color of Law; Article II. Section 8. Ethics in

Government; and “Article III. Section 18. Conflict of Interest.---A code of ethics for all state employees and non-judicial officers prohibiting conflict between public duty and private interests shall be prescribed by law.” as violated as stated herein violated by the “Schemes” of Defendants herein and “others DOE” to aid and abet concealing what Whistleblower RCT exposes as the multiple criminal acts of Lane ET AL.

2. Defendant Charles E. Lane, Jr., individual, of 246 N. Mounts Bay Court Longwood, Florida 32791: a.k.a Sabal Marketing Inc. (Food Broker) at relevant times, a Florida Corporation allegedly organized and existing under the laws of the State of Florida, operating at times from 246 N Mounts Bay Court and at 861 Douglass Avenue Altamonte Springs Florida 32714, having its registered agent as Lanes wife, Mary F. Lane of 246 N. Mounts Bay Court Longwood, Florida and Corporation Information Services, Inc. 1201 Hays Street, Tallahassee, Florida 32301; and Lane now a.k.a. Sealane Marketing Inc. a Florida Corporation of 901 Douglass Ave. Suite 100, Altamonte Springs, Florida 32714 (Lane) a Florida Corporation organized and existing under the laws of the State of Florida having its registered agent as Jeffrey M. Koltun at 557 N. Wymore Road, Suite 100, Maitland, Florida 32751.
3. The Defendants:
4. Defendant as The STATE OF FLORIDA:
5. Defendants as United States Constitutional Officers and Agents, George W. Bush, Steven D. Merryday, Thomas Wilson, and Mike Shumate,

- Robert O'Neill, Steven T. Gross, The Eleventh Circuit Court Judges 1991-present, and Middle District Court, Tampa, and "Others" Individually and per their Agents Person, acted with malice and prejudice for self-dealing of themselves and their co-participants;
6. Defendants as State of Florida Constitutional or as Approved by a Florida Secretary of State as Business Entities and or Corporations or "Agents":
  7. Defendant, FBCCP in name only for and per Derivative Law Claims;
  8. Defendant, The Florida Bar, alleges to act lawfully per Florida Rules of Court and Black Law Rules as the Official Supervisory Agent of the Florida Supreme Court, headquartered in Tallahassee, Leon County, Florida, operating through Agents John Harkness and John Barry and "others" as Board of Governors, Officers and Members.
  9. Defendant, The Florida Supreme Court, alleges to act lawfully per Florida Rules of Court and at times Federal Rules of Courts and Laws dutifully per their Oaths of Office, however at relevant times herein have without the security of their Oath Of Office aided and abetted illegally themselves and these Defendants named herein and "others Doe".
  10. Defendant, The Office of the Governor of the State Of Florida during times held by Governors Lawton Chiles, Buddy McKay, Jeb Bush, Charlie Crist and now Rick Scott are to act per: Florida Statues and Constitution "Article IV, Section 1.(a)....The Governor may require information in writing from all executive or administrative state, county, or municipal officers upon any subject relating to the duties of their perspective



offices... (b) The governor may initiate judicial proceedings in the name of the state against any executive or administrative state, county or municipal officer to enforce compliance with any duty or restrain any unauthorized act.” But upon being notified of the criminal practices of Popper, Williams, Lane/Sabal and “Others” our Governors have: aided and abetted the Acts; failed to provide “Honest Services” or act to protect these citizens;

11. Defendant, Florida Department of Law Enforcement (FDLE) under the care and supervision of Guy Tunnell and Gerald Bailey “allege” to act as the Law Enforcement Arm of State Officers per the Florida Statutes and Agents specifically named herein;

12. Defendant, The Office of the Attorney General of the State Of Florida, Created and with duties by the Florida Constitution Article IV, Sections 4,10, and “others”, under the care and supervision of now Pam Bondi, and past A.G.’s as Bill McCollum, Charlie Crist, Bob Butterworth, from 1991, “others” “allege to act as the Law Enforcement Officers for “Lawful Persons as their master citizens or themselves” however when faced with this conflict of interest have served themselves and their private interests over these citizens rights knowingly violating their Duty: Article IV. 4(b): “...criminal laws occurring or having occurred, in two or more judicial circuits as part of a related transaction, or when any such offense is affecting or has affected two or more judicial circuits as provided by general law; by willfully and knowingly using Bruce Chapin ET AL, David Gibbs, III, ET AL., John Grant ET AL, Charles Scruggs ET AL, Dickinson

- & Gibbons ET AL, Stacey Turmel ET AL, Stanford Solomon ET AL, and Heather Gray ET AL and “alias lawyers, judges and law enforcers” and “others” to “impede” RCT’s now proved legal practices in the Circuits of the 5th DCA and 2nd DCA, and 1st DCA and Circuit Courts of the 18, 9<sup>th</sup> and 13<sup>th</sup> Court Officers and agents as admitted by Chief Judge Canady;
13. Defendant, Judicial Qualifications Commission, created per the Florida Legislature per the Florida Constitution Article V. Section 12. And per “1. vested with jurisdiction to investigate and recommend to the Supreme Court of Florida the removal from office of any justice or judge whose conduct, during term of office or otherwise occurring on or after November 1, 1966,...demonstrates a present unfitness to hold office...Malafides, scienter or moral turpitude on the part of a justice or judge shall not be required for removal from office of a justice or judge whose conduct demonstrates a present unfitness to hold office”. Further, ...J.Q.C. Members conduct is supervised through the Impeachment process or by the Governor per Article IV, Section 7, Florida Constitution serving at his discretion and per “Florida Constitution Article V, Section 19.—All judicial officers in this state shall be conservators of the peace.” Plaintiffs believe only by doing “Honest Services” will peace be conserved equally to all Plaintiffs and their agents specifically named;
14. 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.

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

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

17. Defendant Austin, Lawrence and Landis, P.A. a professional association, at relevant times transacting its business practices out of Orlando, Florida Orange County Florida employed the relevant actors as David Landis and David H. Popper as employees and acted within the scope of their agency and as Florida Bar Lawyers and who continue their frauds and Frauds on the Court and to Plaintiffs;

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

19. Defendant Publix Supermarkets, Inc., a Florida Corporation;
20. Defendant Charles E. Lane, Sr., Individually, and as an employee of Publix Supermarkets, Inc.;
21. Defendant Ed Crenshaw, Individually, and as an employee of Publix Supermarkets, Inc.;
22. Defendant, Patricia McCarthy, of FOCHT & McCARTHY, P.A. a professional association, was retained since about November 1987 and informed and received a payment for "Honest Services" to be rendered in the amount as billed from RCT for RCT ET AL, still not done and who continues her conspired actions in the State Attorney Office against her clients in collusion to do Frauds On the Courts and on her clients;
23. Defendant, Ken Conner, Individually and Ken Conner P.A. a professional association, was retained and informed by a lengthy meeting and review of legal briefs and received payment for "Honest Services" to be rendered from RCT for RCT ET AL, still not done and who continues his conspired actions against his clients in collusion to do frauds in and to the court with "alias judges" in and since 1994;
24. Defendant, Mel Martinez, individually, and as an Attorney and at relevant times Legal partner with Ken Conner and Member of the Florida Bar and as Chairman of the Orange County Commission and as Secretary of HUD, was informed by a lengthy phone call and who continues his conspired actions as an executive with JPMorgan Chase & Co and Chairman of the

JPMorgan Chase Foundation in collusion to do frauds in and to the court with “alias judges” and his co-participants in and since about 1994, ;

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

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

27. Defendant, Florida Lawyers Mutual Insurance Company, (FLMIC), is a mutual insurance company incorporated in the State of Florida, headquartered in Orlando, Florida, and created by the Florida Bar in 1989,

purportedly to provide malpractice insurance policies to Florida lawyers and agents specifically named;

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

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

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

31. Defendant, Santa Rosa County Sheriff’s Office, (Santa Rosa), operates as a Florida Constitution Article VIII. Section 1.(d). and is to operate per the Laws of The United States, State of Florida, and Santa

Rosa County Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law and agents specifically named;

32. Defendant, Charles Scruggs, P.A. a professional association, Defendant Charles Scruggs Individual, and Florida Bar Member (1964); as Attorney At Law, (Scruggs) operates at relevant times operates as the employee, agent, actual or apparent of Charles Scruggs P.A. acting within the scope of his practice out of Tampa, Florida, Hillsborough County was retained and paid for his services at various times from 8/2000, until his termination on 9/30/2003, for failure to provide “Honest Services” having been exposed by Judges Palomino, Timmerman and Crenshaw and “others”;

33. Defendant, Heather Gray, P.A. a professional association, was retained since about February 2003 and informed by a lengthy phone call and at the advice directive of Charles Scruggs ET AL and on March 14, 2003, received a payment for “Honest Services” to be rendered in the amount of \$1,000 from Townsend for Townsend ET AL, still not done and who continues her conspired actions against her clients in collusion even after her agreement to not practice law to do frauds in and to the court with “alias judges” in and since 2004;

34. Defendant, Dickinson & Gibbons, P.A. a professional association, Was retained for rendering “Honest Services” as said by Charles Denny IV, in January 2003, to Judge Arnold, I represent the entire membership of the church in case Townsend ET AL v. Beck ET AL, 02-03812 acting as Agent

within the scope of his employment alleging to provide “Honest Services.” However, production of the 2006, FBCCP Records proved “Lack of Honest Services” and as “Conflict of Interest” and Frauds as Dickinson & Gibbons P.A. could not represent “Honest Services” for the FBCCP Corporation and the “Sect” and RCT and his Children and the Non-Sect at the same time from 2003-2006-now as “Alleged” to the Court and the Clients as Denny ET AL conspired and acted in collusion with “alias Judge Crenshaw” even in 5/10/2006, writing the Malicious Count to include all Defendants aiding and assisting Beck ET AL knowing Defendants are intending to further the frauds on the courts and on Plaintiffs;

35. Defendant UTICA Insurance operates as an Insurance Company in the State of Florida and paid for the services of Dickinson & Gibbons, P.A. in the cases stemming from RCT ET AL v. Beck ET AL 02-03812. and “Others DOE”;
36. Defendant, John Grant P.A. a professional association, Defendant John A. Grant Jr., Individual; John Grant Jr. Esquire; at all times material hereto, the Defendant John A. Grant Jr., was employed by John A. Grant Jr. P.A. and acting within the scope of his employment or was an agent actual or apparent, of John A. Grant Jr. P.A. acting within the scope of his agency and as a Florida Bar Member (1994-); A Florida State Senator; and FBCCP Registered Agent (1994-2007; (Grant) at relevant times “transacting his operations” in Tampa, Florida, Hillsborough County and Tallahassee, Florida, Leon County and acting allegedly Providing Honest



Services for Townsend individual, FBCCP Corporation and “The Congregational Body” and all Citizen Plaintiffs but in his “fraud, collusion and arbitrariness” only acting and being paid privately without authorization from designated funds as Attorney for the Sect; Sect Agents and Other Defendants knowingly and intentionally violates and breaches his Attorney/Client Fiduciary Duty and Contract Duties to: The FBCCP/CPCS; non-sect “Body” members as Officer/Guardian RCT speaks; RCT individual; the RCT Children (J.D.T. and J.G.T.) and other non-sect members even in 2011, by intentionally, recklessly and fraudulently acting in omission of truthful disclosure; “fraud, and arbitrariness” against RCT legal operations under the FBCCP By-Laws; CPCS Policy Handbook; State and Federal Laws; Florida Bar Rules; and Florida Rules of Courts regarding grievances with “Sect” members and “Sect Agents” since 1994 ([1] fraudulent uses of FBCCP Designated Funds and Members Property for Sect self-dealing purposes) and Defendants and “others Doe” and concealing their fraudulent practices even to intentionally violate the citizens of tax payers and Eminent Domain money just to fuel the criminal acts/omissions of the “Sect” known and exposed since 1997 per the frauds by the “Sect” in “[2] Building Frauds Scheme” per the Earle Property Acquisition Contract and obtaining Eminent Domain Money and of Bank loans as deprivations by Frauds and omissions to Plaintiffs as “The Body” and Citizens. John Grant from 1994 and to now still knowingly using his “Under Color of Law” Alias authority as

he continues his frauds, illegal obstruction and extortion to Defame RCT, Plaintiffs and “others” enlisting “others” as, Mark Ober ET AL to include Pam Bondi, and Sheriff Gee and his Deputy McDarby and “Others” via defamation e-mails to practice with him their criminal enterprise continuing threats to RCT, his Children and FBCCP Members and “others” as Grant admitted the scheme 11/10/2012;

37. Defendant, Hillsborough County Florida, operates under Florida Constitution Article VIII Section 1.(a) and per the Hillsborough Charter is to provide “Honest Services” to these citizens thereof;
38. Defendant, Hillsborough Board of County Commissioners, operates under Florida Constitution Article VIII Section 1(e), and per the Hillsborough Charter and Florida Laws is to provide “Honest Services” in the duty of and with the General Laws.
39. Defendants, as Hillsborough County Sheriffs, and his deputies operates per the Florida Constitution Article VIII, Section 1(d), and as Executive officer of the Hillsborough Circuit Courts per F.S. 26.49, and per the Hillsborough Charter and Florida Laws is in the duty of and with the General Laws, Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law. Cal Henderson, and Walter Heinrich, both as Past Sheriff of Hillsborough County and Sheriff David Gee as the Current Sheriff have in collusion for themselves, their Deputies and their “other” Co-Participants

failed to provide “Honest Services” and make ongoing threats to these Plaintiffs;

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

41. Defendants, as Pasco County Sheriff, and his deputies operates per the Florida Constitution Article VIII, Section 1(d), and as Executive officer of the Pasco Circuit Courts per F.S. 26.49, and per the Pasco Charter and Florida Laws is in the duty of and with the General Laws, Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” and made threats to RCT;

42. Bob White, as Past Sheriff of Pasco County, with Hillsborough County Sheriff David Gee as the Current Sheriff have in collusion for Themselves, their Deputies and their “other” Co-Participants failed to provide “Honest Services” to these Plaintiffs and made threats to RCT;

43. Defendants, as Santa Rosa County Sheriffs, operates per the

Florida Constitution Article VIII, Section 1(d), and as Executive officer of the Santa Rosa Circuit Courts per F.S. 26.49, and per the Santa Rosa Charter and Florida Laws is in the duty of and with the General Laws, Charter and Ordinances not inconsistent with general law as “Honest Services” and for lack of “Honest Services” may be subjected to the law. Since 1999 as Past Sheriff’s and current Sheriff “DOE” with Hillsborough County Sheriff David Gee as the Current Sheriff have in collusion for themselves, their Deputies and their “other” Co-Participants failed to provide “Honest Services” to these Plaintiffs and in 2013 still make threats to RCT and his children and “others”;

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

45. Defendant Janssen & Igor, C.P.A. a Florida Corporation operating and doing it business interests from Pinellas County, Florida. With contracts for service from FBCCP and CPCS at various relevant times and intentionally failing to provide “Honest Services”.

46. Defendant, The Department of Children and Families of Florida, (DCF) Alleges to operate per the General Laws to seek the welfare of Florida Citizens and Families and safely reunite families as their alleged first goal but as proved herein “Failed to provide Honest Services” by frauds.

47. Defendant The Department of Financial Services alleges to operate per the Florida Constitution and General Laws to seek to as the arm of the State provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services”;
48. Defendant Dr. Lon Lynn, a medical doctor, operating and doing its business interests from Hillsborough County Florida and knowingly, intentionally and recklessly failing to provide “Honest Services”.
49. Defendant The States Attorney’s Office and Officers operating under the Care and Supervision of Mark Ober and Assistant State Attorney Pam Bondi and with Patricia McCarthy at relevant times Alleges to operate per F.S. 27 and the Florida Constitution and the General Laws to seek the welfare of Florida Citizens and Families and safely reunite families through their Department of Victims Assistance as their alleged first goal per their Officers, Curtis Baughman, Nancy Lopez, Bob Petschow, Chuck Holland and others but as proved herein “Failed to provide Honest Services” by collusion and frauds.
50. Defendant The Fifth District Court of Appeals of Florida collectively and as individuals named and included here alleges to operate per the Florida Constitution and General Laws to seek to as the arm of the State provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services” but acting intentionally in Fraud On the Court and Plaintiffs in their illegal use of Per Curium Rulings and other Frauds on the Court and Plaintiffs;

51. Defendant, The Thirteenth Circuit Court of Florida alleges to operate per the Florida Constitution and General Laws to seek to as the arm of the State provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services”;
52. Defendant The Ninth Circuit Court of Florida alleges to operate per the Florida Constitution and General Laws to seek to as the arm of the State provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services” but acting intentionally in Fraud on the Court and Plaintiffs in their illegal use of Per Curium Rulings and other Frauds on the Court and Plaintiffs;
53. Defendant The United States District Court, Middle District of Florida, Tampa, collectively and individually, alleges to operate per the U.S. and Florida Constitutions and General Laws to seek to as the arm of the State and Federal Government to provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services” to continue Fraud on the Courts and on these Plaintiffs;
54. Defendant The Eleventh Circuit Court of Appeals of these United States collectively and individually, alleges to operate per the U.S. and Florida Constitutions and General Laws to seek to as the arm of the State and Federal Government to provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services” to continue Fraud on the Courts and on these Plaintiffs;

55. Defendant The Department of Justice of these United States collectively and individually, alleges to operate per the U.S. and Florida Constitutions and General Laws to seek to as the arm of the State and Federal Government to provide investigations and render services and compensation to victims but to Plaintiffs herein have failed to provide “Honest Services” to continue Fraud on the Courts and on these Plaintiffs;
56. Defendant, The Tampa Bay Times formerly The Saint Petersburg Times alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;
57. Defendant, General Media Operations Newspaper and as Subsidiary The Tampa Tribune alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;
58. Defendant, Sears Holding, LLC. d.b.a. “Kmart” alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;
59. Defendant Sunbelt Equipment Sales, Inc. alleges to operate per the

- Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;
60. Defendant, The City of Tampa, alleges to operate per the Florida and United States Constitution and General Laws but to Plaintiffs herein have failed to provide “Honest Services” by acts of themselves and their employees named in this suit and their co-participants;
61. Defendants, as Individuals being sued in their individual capacities:  
Defendant Pam Bondi, Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Hillsborough County, Florida and an employee, director/officer/agent of Florida and Florida Bar Member acting within the scope of her agency, the Florida Supreme Court, and as Attorney’s General of Florida, and as agent of State Attorney Mark Ober specifically alleging to provide “Honest Services” with HCSO Gary Terry, Joe Howlett, Mike Smoak and John McDarby and “Others” necessary to continue the coercions in Ober’s Victims Services Department and actions for Sheriff David Gee at the written orders of Grant and Pat Bean since about 1994, and in or around 11/15/2001 and since other times “impeding” and Obstructing Justice by herself and with her co-participants to bring the False Allegations set forth in the Sham and Frauds and Defamations of Ron Beck ET AL and Karen Harrod Townsend ET Al in cases 01-15813 (Repeat Violence) and 01-



15814 (Domestic Violence) and the Divorce case 02-4974 and “Stalling” and defamations of cases as listed and included herein.

62. Defendant, Jeb Bush, Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Dade and Leon County, Florida and an employee, director/officer/agent of The State of Florida, acting within the scope of his agency, the Florida Supreme Court, and co-participants for self-dealing with malice being informed since 1994.

63. 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.

64. 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.

65. Defendant, John Harkness Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Leon County, Florida and an employee, director/officer/agent of The Florida Bar and Florida Bar Member acting within the scope of his agency, the Florida

Supreme Court, and co-participants for self-dealing with malice to obstruct justice of these Plaintiffs.

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

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

68. 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.

69. Defendant, Linda Chapin is a resident/citizen of the State of Florida, doing business in or from Orange County, Florida and an employee, at relevant times as director/officer/agent of Orange County and of the State of

Florida transacting her business within the scope of her agency and the F.S.Ct. as the Orange County Commissioner Chairperson and as Orange County Clerk of Court and “other” capacities yet to be exposed.

70. Defendant, FDLE Director, Gerald Bailey Individual, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Leon County, Florida and an employee, director/officer/agent of The Florida Department of Law Enforcement acting within the scope of his agency, with the Florida Supreme Court, and co-participants for self-dealing with malice to obstruct justice to these Plaintiffs.

71. 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.

72. 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

73. 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.

74. Defendant, John A. Grant Jr., Individual; John Grant Jr. Esquire; at all times material hereto, the Defendant John A. Grant Jr., was employed by John A. Grant Jr. P.A. and acting within the scope of his employment or was an agent actual or apparent, of John A. Grant Jr. P.A. acting within the scope of his agency and as a Florida Bar Member (1994-); A Florida State Senator; and FBCCP Registered Agent (1994-2007; (Grant) at relevant times “transacting his operations” in Tampa, Florida, Hillsborough County and Tallahassee, Florida, Leon County and acting allegedly Providing Honest Services for RCT individual, FBCCP Corporation and “The Congregational Body” and all Citizen Plaintiffs but in his “fraud, collusion and arbitrariness” only acting as Attorney for the Sect; Sect Agents and Other Defendants and “Doe” knowingly and intentionally violates and breaches his Attorney/Client Fiduciary Duty and Contract Duties to: The Courts; The FBCCP/CPCS; non-sect “Body” members as

Officer/Guardian RCT speaks; RCT individual; the RCT Children (J.D.T. and J.G.T.) and other non sect members even in 2013, by intentionally, recklessly and fraudulently acting in omission of truthful disclosure; “fraud, and arbitrariness” against RCT 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 and Religious Practices per the By-Laws and State Laws for Sect self-dealing purposes) and Defendants and “others Doe” and concealing their fraudulent practices even to intentionally violate the citizens of tax payers and Eminent Domain money just to fuel the criminal acts/omissions of the “Sect” and “Others” known and exposed since 1997 per the frauds by the “Sect” in “[2] Building Frauds Scheme” per the Earle Property Acquisition Contract and obtaining Eminent Domain Money and of Bank loans as deprivations by Frauds and omissions to Plaintiffs as “The Body” and Citizens. Grant from 1994 and to 2013 still knowingly using his “Under Color of Law” Alias authority as he continues his and his co-participants frauds, illegal obstruction and extortion to RCT, Plaintiffs and “others” enlisting “others” to practice with him the criminal enterprise and “Frauds on the courts” and even the Extrinsic Frauds by the EN BANC ruling of the Eleventh Circuit court of Appeals in 2013 continuing the Frauds on the Court since 1988 in the underlying cases.

75. 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 Defendants Dickinson & Gibbons P.A. an intentional and willful co-participant of defendants in their Fraud on the Courts and Plaintiffs.
76. 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 acts from Tampa, at 10011 Cannon Dr. Riverview, FL 33578 and P.O. Box 2668, Riverview, 33568, Florida, Hillsborough County.
77. TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER OF FBCCP TIM JEFFERS, FBCCP DEACON, TIM JEFFERS, FBCCP TRUSTEE (2005-present), "Sect Member";
78. 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";
79. MICHAEL JOHN CORBIN, Individually, MICHAEL JOHN CORBIN AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, "Sect Member";

80. RONALD L. BECK, (a.k.a. Ron Beck) INDIVIDUALLY, REVEREND  
RONALD L. BECK, AS SENIOR PASTOR, OF FBCCP, RON BECK, AS  
PASTOR /MEMBER OF FBCCP AS OF CPCS SCHOOL BOARD, RON  
BECK, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,  
(PACM), AS BY-LAW'S PASTOR/MEMBER OF ALL COMMITTEES  
OF FBCCP AND CPCS, "Sect Member";
81. WILLIAM T. BROWN, (a.k.a. Bill Brown), INDIVIDUALLY, REVEREND  
WILLIAM T. BROWN, OF FBCCP AS PASTOR OF EDUCATION AND  
ADMINISTRATION;
82. HERMAN MEISTER, INDIVIDUALLY, REVEREND HERMAN MEISTER,  
AS PASTOR OF CPCS 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, "Sect Member";
83. 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 "Sect Member";
84. 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 "Sect Member";

85. FRANK EDWARDS, INDIVIDUALLY, FRANK EDWARDS AS FBCCP FINANCE COMMITTEE MEMBER, AND "Sect Member";
86. MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP; "Sect Member"
87. MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMATE, AS CHAIRMAN OF DEACONS, 2000-2001, OF FBCCP; "Sect Member";
88. 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";
89. DR. LON LYNN, INDIVIDUALLY, "Sect Member";
90. KAREN HARROD TOWNSEND, Individually, KAREN HARROD TOWNSEND AS EMPLOYEE OF CPCS/FBCCP, "Sect Member";
91. PAULA POWELL, Individually, PAULA POWELL AS FBCCP FINANCIAL SECRETARY EMPLOYEE, PAULA POWELL AS CPCS SCHOOL BOARD MEMBER, "Sect Member";
92. CARL (BUDDY) RAWLS, Individually, CARL(BUDDY) RAWLS, AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, AND DEACON, "Sect Member";
93. DUANE MILFORD, Individually, DUANE MILFORD AS LONG RANGE PLANNING COMMITTEE MEMBER OF FBCCP, AS PERSONNEL COMMITTEE MEMBER AS CHAIRMAN, 1997, "Sect Member";



94. 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 standing objection of RCT per the Nominations Committee], "Sect Member";
95. GAYLE LYNN, Individually, GAYLE LYNN, AS EMPLOYEE AS DEAN OF STUDENTS CPCS/FBCCP, "Sect Member";
96. APRIL BECK, Individually, APRIL BECK, AS EMPLOYEE OF CPCS/FBCCP, "Sect Member";
97. JIM LEAHY, Individually, JIM LEAHY AS PERSONNEL COMMITTEE CHAIRMAN OF FBCCP, JIM LEAHY AS DEACON FBCCP, "Sect Member";
98. JOE KAREAS, Individually, AS City Tampa Police Officer;
99. JACKIE CORBIN, Individually, JACKIE CORBIN AS CPCS SCHOOL BOARD MEMBER 2007, "Sect Member";
100. JOYCE MEISTER, Individually, JOYCE MEISTER, AS EMPLOYEE OF CPCS/FBCC, "Sect Member";
101. JACKIE HOWLETT, Individually, JACKIE HOWLETT AS CPCS SCHOOL BOARD MEMBER, JACKIE HOWLETT AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, "Sect Member";
102. MIKE SHAR, Individually, "Sect Member";
103. DON BECK, Individually, DON BECK, "Sect Member";
104. JOHN COLLINSON, Individually, JOHN COLLINSON, AS DEACON, "Sect Member";

105. BILL CRAFT, Individually, BILL CRAFT, AS DEACON, BILL CRAFT AS 2007 CHAIRMAN OF THE FINANCE COMMITTEE, "Sect Member";
106. ED HOPKINS, Individually, ED HOPKINS, A Deacon, "Sect Member";
107. JERRY MILLER, Individually, JERRY MILLER, A Deacon, "Sect Member";
108. WILSON SMITH, Individually, WILSON SMITH, AS Deacon; "Sect Member";
109. DAVID POWELL, Individually, DAVID POWELL, AS DEACON, (Inactive 2007) "Sect Member";
110. MIKE POWELL, Individually, MIKE POWELL, AS DEACON, "Sect Member";
111. MIKE HOLNESS, Individually, MIKE HOLNESS, AS "Sect Member";
112. MARK JEFFERS, Individually, MARK JEFFERS, AS "Sect Member";
113. THE FIRST BAPTIST CHURCH OF CITRUS PARK BOARD OF DEACONS OF 1994- 2012; Individually and as A Officers Board and as "Sect Members";
114. 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 and intentionally and knowing being litigants with the legal cases of 01-15813 and 01-15814 of Ron Beck and Karen Harrod Townsend to obstruct justice to these Plaintiffs;

115. DR. LON LYNN, Individually, Dr. Lon Lynn, A MEDICAL DOCTOR, per Florida Statutes §766, At all times material hereto, is a resident/citizen of the State of Florida, doing business in or from Hillsborough County, Florida and an employee, director/officer/agent of Dr. Lon Lynn M.D.. a Florida Professional Association acting within the scope of his agency, the Florida Supreme Court, and lawfully served by Certified Mail in July and August of 2000, to stop his illegal practice aiding and abetting his co-participants for self-dealing with malice to obstruct these Plaintiffs.

116. DEFENDANTS IN THIS SECTION ARE INCLUDED HEREIN THIS COMPLAINT AS LISTED IN THE ABOVE CAPTION OR IN THIS COMPLAINT IN THEIR INDIVIDUAL AND IN THEIR AGENCY PERSONS AS CITIZENS OF THESE UNITED STATES WHO FOR SELF-DEALINGS WITH MALICE KNOWINGLY AND WILLFULLY HAVING BEEN DULY WARNED OBSTRUCT AND DAMAGE THESE PLAINTIFFS AS: THE ESTATE OF DON HARROD; STEVE HARROD KEITH HARROD, NORMA HARROD; THE OFFICE OF THE PRESIDENT OF THE FLORIDA BAR, HENRY M. COXE III, INDIVIDUAL, HENRY M. COXE III, AS PRESIDENT OF THE FLORIDA BAR, THE FLORIDA BAR OFFICER

OF TAMPA BRANCH OFFICE EXECUTIVE/DISCIPLINE DIRECTOR AS  
BRANCH STAFF COUNSEL, JOHN ANTHONY BOGGS, INDIVIDUALLY,  
AS A MEMBER OF THE FLORIDA BAR SINCE 1978; JOHN ANTHONY  
BOGGS, AS THE FLORIDA BAR DISCIPLINARY PROCEEDURES  
EMPLOYEE; TIMOTHY PATRICK CHINARIS, INDIVIDUALLY, AS A  
MEMBER OF THE FLORIDA BAR SINCE 1986;TIMOTHY PATRICK  
CHINARIS, AS THE FLORIDA BAR DISCIPLINARY PROCEEDURES  
EMPLOYEE; THE FLORIDA BAR TAMPA INTAKE STAFF COUNSEL  
EMPLOYEE, MS. "DOE" LIEMAN, MS. "DOE" LIEMAN, Individually; THE  
FLORIDA BAR TAMPA INTAKE STAFF EMPLOYEE MS. JANE CRISTY  
and Ms. JANE CRISTY, Individually; SANTA ROSA COUNTY DEPUTY  
DETECTIVE RYAN, Individually and AS Deputy; SANTA ROSA COUNTY  
DEPUTY WHEELER, Individually and AS Deputy; SANTA ROSA  
COUNTY SHERIFF's DEPARTMENT;SANTA ROSA COUNTY, OF THE  
STATE OF FLORIDA;HILLSBOROUGH COUNTY FLORIDA, OF THE  
STATE OF FLORIDA;THE HILLSBOROUGH COUNTY FLORIDA BOARD  
OF COUNTY COMMISSIONERS JOINTLY AND INDIVIDUALLY AS;  
ROSE FERLITA, KEN HAGAN, KEVIN WHITE, AL HIGGINBOTHAM,  
JIM NORMAN, BRIAN BLAIR, MARK SHARPE; AND PAT BEAN, AS  
HILLSBOROUGH COUNTY ADMINISTRATOR; PAT BEAN ATTORNEY  
AT LAW; AND PAT BEAN, INDIVIDUALLY; THE SECOND DISTRICT  
COURT OF APPEALS and JUDGES OF THE SECOND DISTRICT  
COURT OF APPEALS AS "PERSONS" JOINTLY AND AS "PERSONS"

INDIVIDUALLY AS; STEVAN T. NORTHCUTT, CHARLES A. DAVIS, CRAIG C. VILLANTI, DOUGLAS A. WALLACE, EDWARD C. LaROSE, CAROLYN K. FULMER, CHRIS W. ALTENBERND, PATRICIA J. KELLY, MARVA CRENSHAW, DARRYL C. CASANUEVA, Individual, Alias Honorable Chief Justice of the 2DCA; JAMES BIRK HOLD, INDIVIDUALLY AND AS CLERK OF THE SECOND DISTRICT COURT OF APPEALS, LAKELAND FLORIDA; THE FLORIDA SUPREME COURT, AND JUDGES OF THE FLORIDA SUPREME COURT AS JUDGES AND AS "PERSONS" JOINTLY AND "PERSONS" INDIVIDUALLY AS; CHIEF JUDGE FRED LEWIS, CHARLIE T. WELLS, HARRY LEE ANSTEAD, BARBARA J. PARIENTE, PEGGY A QUINCE, RAOUL G. CANTERO, KENNETH B. BELL; CHIEF JUDGE CHARLES CANADY; KMART CORPORATION also at relevant times d.b.a. SEARS HOLDING COMPANY, INC.(Kmart); JOE PALKO, Individual, JOE PALKO, EMPLOYEE AS Vice President (Kmart); 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, relevant times now retired; "DOE", as any and all Insurance and or Bonding Companies, Carriers or the like for any Defendant or representative of any Defendant herein, past, present or future; "DOE", as any yet unknown accomplice to the acts of defendants herein; JANET E. COATS, Individually, JANET E. COATS AS EXECUTIVE EDITOR AND VICE PRESIDENT OF THE TAMPA TRIBUNE; MICHELLE BEARDEN, Individually, MICHELLE BEARDEN, AS TAMPA TRIBUNE REPORTER/EMPLOYEE;THE SAINT PETE TIMES; BILL COATS, Individually, BILL COATS, AS A ST. PETE TIMES EMPLOYEE/REPORTER PAUL TASH, Individually, PAUL TASH, AS SAINT PETE TIMES, EDITOR, CEO and CHAIRMAN; DARRYL C. CASANUEVA, Individual, Alias Honorable 2DC Chief Justice; SEMINOLE COUNTY CLERK, 1989 AND CURRENT; AND OTHERS "DOE" TO BE NAMED UPON COMPLETED DISCOVERY:

117. This is an action for a MOTION FOR EVIDENTIARY HEARING to expose: (1) The Order Of Transfer of case 88-2554 is void by the COLLUSION AND QUID PRO QUO UNJUST ENRICHMENT BY "OTHERS" including ATTORNEYS FOR PLAINTIFF RCT AND THE DEFENDANT COUNTER/PLAINTIFF LANE TO DO FRAUD ON THE COURT OF AND EVEN SEMINOLE COUNTY FLORIDA TO EVADE OUR COURTS INTEGRITY AND ORDERS FOR LANE ET AL TO PRODUCE RECORDS AND EXPOSE CRIMINAL ACTS; THE SCHEME TO DO EXTRINSIC FRAUDS TO DEFAME RCT TO KEEP RCT FROM EVERY HAVING DISCOVERY OF THE OMISSIONS AND FRAUDS OF CHARLES E. LANE, JR. AND THOSE AS HIS CO-PARTICIPANTS NAMED HEREIN AND "OTHERS DOE" WHICH ACTED FOR RICO, FRAUD, ANTI-TRUST, UNJUST ENRICHMENT, KICKBACKS AND EXTORTION STILL ONGOING IN 2013, TO VIOLATE CIVIL RIGHTS OF PLAINTIFFS and for a jury award of damages in excess of \$50 Million and is within the jurisdiction of this court based on an August 7, 1987, Joint Venture Business Agreement (JVA) between RCT and Lane and resulting frauds, breach of contracts and aiding and abetting omissions of truthful disclosure resulting from the conspiracy to conceal illegal actions of Lane ET AL in collusion with all Defendants. Said JVA Contract states litigation is to be in Seminole County, Florida as was filed June 1988, by Austin, Lawrence and Landis, P.A. as Randall Townsend v. Charles E. Lane, Jr., d/b/a SABAL MARKETING CASE NO. CI 88-2554-CA-03-08, IN THE

CIRCUIT COURT OF THE 18th JUDICIAL CIRCUIT IN AND FOR  
SEMINOLE COUNTY FLORIDA, suing for: Breach of Contract; Specific  
Performance; Interference with the Advantageous Business Relationship;  
Unjust Enrichment; and An Accounting as first intentionally violated by  
Charles E. Lane Jr. a/k/a and d/b/a Sabal Marketing (Lane) operating  
illegally per F.S.686.201 (Commission Representative) in conspiracy  
operating for illegal purposes with Lanes childhood friend and as his  
attorney Charles E. Williams, Jr. and creating an August 7, 1987, "Joint  
Venture Business Agreement" with RCT d/b/a "Future Marketing" and with  
Defendants and "Others Doe" who still conspire in illegal acts, frauds and  
non-honest practices, to defame RCT and those for whom he speaks,  
illegally detain, breach contracts and continue frauds against Plaintiffs.  
Defendants admit claims RCT makes since 1987, to be Truth yet continue  
RICO Acts and violations of Civil Rights of Assembly, Vote, and pursuits of  
Happiness in violations of the U. S. Constitution, Florida Constitution and  
FBCCP By-Laws.

118. RCT ALLEGES THE ACT OR ACTS OF MOVING THE CASE  
FROM SEMINOLE COUNTY, FLORIDA TO ORANGE COUNTY  
FLORIDA was for the conspired and illegal purpose by Defendants to  
prevent RCT from his day in an honest court and to conceal from the  
Court of Judges Muszynski and Judge Davis: the full extent of the criminal  
actions of which Lane was and is doing as extortion and kickbacks and  
drug usage and other illegal actions and these parties for which



participated in these illegal actions that RCT by the presentation of his case would expose; additionally the exposure of the Business Records of the JVA during the periods of 1987-1993 and beyond would expose RICO, FRAUDS and other illegal actions of Corruption; the presentation of the RCT case(s) would show that attorneys, McCarthy, Williams, Popper, Landis, Chapin, Gibbs, CLA, Scruggs, Gray, Denny, and "Others as named Defendants herein and Others DOE" receive benefits from Lane and Lane ET AL in the forms of financial kickbacks, bribes, Quid Pro Quo Benefits, directly from Lane and or indirectly from Lane's father Charles E. Lane Sr. and Charles E. Lane Sr.'s protégé at Publix Supermarkets Incorporated as Ed Crenshaw and Joe Ligori and "Others". The actions of moving the case to Orange County was specifically for the direct purpose for Linda Chapin as Chairwoman of the Orlando County Commission for her husband, Bruce E. Chapin and his law partners and law firm of O'Neill, Chapin, Liebman, Popper and Cooper to conceal their malfeasance done to their client RCT ET AL and that Bruce E. Chapin and Linda Chapin and Others did directly also take bribes and benefit from Lane, Lane Sr. and Crenshaw and "Others" for their acts to tell RCT false information, fail to do Honest Services and for the Omission of Truthful Representation to continue the concealment of Lane and Others criminal acts since about 1987 until now. Records show the Chapin's enlisted and empowered directly and indirectly each defendant and "Others Doe" as stated herein to continue Fraud on the Court, Extrinsic Frauds and

Intrinsic Frauds and other acts of RICO, Extortion and False Detainments of Persons, Property and Civil Rights directly operating via Governor Chiles and “agents”, The Florida Bar John Harkness and John Berry and “agents”, The Florida Supreme Court and “agents”, The Ninth Circuit Court and “agents” as Chief Judge Powell, Stroker, Strickland, Perry and Others, and the Fifth DCA as Harris, Peterson, Thompson, Sawaya, Orfinger and others to conceal Fraud on the Court and Plaintiffs and uses P.C.A. to continue said Frauds;

119. On or about August 7, 1987,) at the Publix Supermarket Inc. headquarters in Lakeland, Polk County Florida, RCT and Lane entered into, signed and had notarized, a Joint Venture Brokerage Agreement (JVA) as Lane represented to RCT that Lane owned secured written Contracts with the companies listed in said JVA agreement (a copy of which is attached hereto as Exhibit 1, and made part of this Complaint) as Lane affirmed he and the clients listed in the JVA needed Townsend to manage the business Lane claimed he already secured per the contracts with said companies listed in section 1 and section 2 of said JVA.

120. Upon signing the JVA on 8/7/1987, Lane knowingly in frauds: failed to produce his claimed secured written JVA Contracts stating “he forgot the file at home” as stated; and later demanded RCT was for the JVA required to renegotiate with said listed and new companies as New Contracts with Lane presenting RCT to these clients and new clients as a Joint Venture Partner 50/50 ownership as per the JVA. Clients re-affirmed

to do business only with RCT as Lane had lost his contracts and creditability and had been even prohibited based on his past and unknown current frauds from representations for or with said companies listed in the JVA. RCT's admired character and business reputation and recommendations from persons in the trade secured new contracts and in several cases the old and new companies specifically said Lane was prohibited from further contact with said companies due to Lanes tainted reputation and extortion practices. Defendants and each of them, knowingly and willfully upon learning how much the negligence McCarthy and Popper of exposing frauds by subpoena's to produce the contracts and bank records showing the frauds of Lane and Williams and withholding of money and Rights of RCT causing RCT lost business profits from the attorneys McCarthy, Williams and Popper stopping RCT from "any business Lane may object too" and warning RCT to not contact or wrongly influence clients due to the criminal acts of Lane discovered November 1987, at the Embassy Hotel doing drugs and the resulting frauds to conceal his co-participants in drug uses and kickbacks and their other illegal actions still conspired and agreed among themselves to damage, defame and withhold honest legal services to RCT by depriving RCT of the benefits of this contract and his Civil Rights by inducing each Defendant to do any act necessary to defame RCT to his family, clients, Church and "Others" as a: "liar about his JVA Rights and as a whistle blower to facts of illegal actions of Lane and "Others DOE", "liar about his

legal rights and due process trying to expose collusion and Fraud on the Court and extrinsic frauds by McCarthy, Williams, Popper and Chapin and “Others DOE” to the 18<sup>th</sup> Circuit Judges Muszynski and Davis and in collusion with the 9<sup>th</sup> Circuit Court Judges under the directives of Chief Judge Rom Powell and “others DOE” as RCT discovered his claims were truthful legal arguments per the ruling discovered of Robinson v. Weigel 5D05-2380, and the odious and outrageous reversal of the 5<sup>th</sup> DCA opinion of judge Orfinger even after the admissions of past torts by Florida Supreme Court Judge Canady and the 11<sup>th</sup> Court of Appeals Ruling in 2008, ruling RCT and the Plaintiffs for which he speaks had “ineffective counsel” revealing the plots began by McCarthy and Popper ET AL. Further, additional Defendants David Gibbs III since 1991 and John Grant, Jeb Bush, Ken Conner, Tim Jeffers, Joe Howlett as directed Under Color of Law since 1994, knowingly and willfully conspired and agreed among themselves Under Color of Law to allege as FBCCP Registered Agent and Senator John Grant alleged since 1994 and then on 11/2/2007, wrote in an e-mail:

“It would appear to me that you are either obsessed with damaging the reputation of others, bankrupting the Citrus Park Baptist Church or a mental case who should be Baker Acted....Your web page and your actions are a disgrace...By a copy of this to Sheriff David Gee, I am requesting that a report be filed in case you elect to continue

such actions towards me and with the suggestion that the local authorities have you mentally evaluated.”;

“liar about the FBCCP/CPCS By-Laws Rights and practices of the FBCCP Corporation and Members”, “liar about the misappropriation of FBCCP/CPCS designated funds by the “SECT”, “Liar as the Long Range Committee Chairman about the Eminent Domain Settlement Process and Satisfaction the “Sect and Sect Agents” performed as frauds to the Membership and Tax Payers just to enrich their own pockets at the expense of the FBCCP Corporation, Members and Tax Payers; “liar that the FBCCP should not buy the 18105 Gunn Highway Property”, “liar that the FBCCP/CPCS would not be permitted to build and relocate the Church/School at the 18105 Gunn Highway property”, “ An Infidel”, “Dangerous with guns”, “Abuser of his wife and kids”, “Person who needed to be Baker Acted”, “liar that the estranged wife Karen, “pastors” Nasworthy, Beck, Meister, Brown, CPCS Employees and “Others were endangering children, doing frauds and doing unjust enrichment at the expense of the FBCCP/CPCS Corporation, Members and Tax Payers, and multiple and various other defamations made to continue RCT as a “fraud” since 1987 to conceal the now proved frauds of inducement by Lane, frauds of JVA Rights, extortions, kickbacks and drugs use of Lane and Williams and “Others DOE” RCT has tried to expose since 1987.

121. On or about November 1987, RCT having been deceived: about the Sabal contract relationships prior to 8/7/1987; and not earning income

on the claimed “existing” business; and not being paid for other daily services as funds were being diverted by Lane; and observing Lane in multiple acts of extortion, kickbacks and frauds; set a meeting with Lane and at the Embassy Suites in Tampa and confronted Lane and found Lane using and admitting to the use and distribution of illegal drugs.

122. RCT ended the meeting and immediately sought legal counsel from Focht & McCarthy, P.A. and fully informed attorney Patricia McCarthy (McCarthy) of Lane and his frauds, illegal actions and collusion with others as Joe Ligor, the former supervisor of Lane and RCT at our former employer Nova Sales Inc (Nova). McCarthy was fully advised that RCT had at many clients request resign from Nova due to frauds and corruption and go into business for himself and operate an ethical Broker/Representative Services Company not by extortion and kickbacks.

123. McCarthy and Popper advised Townsend: “limit all business practices that may offend Lane” and they would do negotiations with Lane and Williams; do discovery of bank records and contracts with clients; get receiver;(see 5/26/88 letter) as yet in 2013, no attorney or court has yet done to expose Lane ET AL’s schemes and or advance the Proofs for RCT to determine who owned what from the JVA and how RCT could fully separate for the benefit of all clients and RCT by their actions through the courts obtaining a Declaratory Judgment and other relief as their failures of Honest Services continues crimes.

124. On or about November 1987, Defendants Lane and Williams, and “Others DOE”, who are co-participants of the extortion, kickbacks and drug participants with Lane and Williams, and each of them, knowingly and willfully conspired and agreed among themselves to damage RCT and “Others” by depriving Plaintiffs of **the benefits of this contract and doing his own business as Future Marketing by inducing Co-Defendants and “Others DOE” to breach the contract, prohibit new contracts, breach new contracts, and perform various defamations and torts against Plaintiffs since 1987 or before as stated herein and upon discovery exposure of additional acts of “Others DOE” doing additional torts and violations of contracts, laws and Civil Rights.**
125. On or about March 1988, McCarthy surprised RCT and advised RCT to secure the services of attorney David H. Popper of Austin, Lawrence and Landis, P.A. to do negotiation and litigation issues.
126. On or about June 1988, Complaint was filed CASE NO. CI 88-2554-CA-03-08, in Seminole County (a copy of which is attached hereto as Exhibit 2, and made part of this Complaint).
127. On, about or before 1987, Defendants Lane, Jr., Williams Jr., Joe Ligori and “Others DOE” knowingly and willfully conspired to conceal their illegal practices including defamation, frauds, extortion, kickbacks and drug participation and promoted frauds regarding: the existence and content of contracts Lane alleged to own prior to RCT signing the JVA; and what rights RCT or Lane respectfully had per the JVA; or Rights to do

business alleging that a Non-Compete Clause prohibited RCT from doing any business as this would cause Lane and Ligori and "Others DOE" to lose contracts as many RCT clients desired RCT to operate his own Future Marketing in an honest practice of Broker/Manufacture Representation Services without the RICO, frauds and extortion.

128. Pursuant to the conspiracy, and in furtherance of the conspiracy, Defendants McCarthy, and Popper and "Others DOE" with Lane and Williams, knowingly and willfully conspired and agreed among themselves to do: Frauds to conceal their negligent misrepresentations keeping RCT from doing his business and protection of his reputation and providing income for his family and they conspired to do Malicious Prosecution and Abuse of Process by filing a "Sham" Counterclaim and do Illegal Detainment by failing to produce documents or do discovery to conceal the kickbacks, extortion and money trail paid by Lane, Ligori, Publix and "OTHERS DOE" to conceal their crimes and malfeasance (Failure to provide truthful and honest practices in legal care, Torts obstructing justice, Torts in violation of Contract Rights and Torts in violation of Interstate and Intra-State Commerce, Tort of or to public morals, peace, safety and obstruction of Civil Rights (Future Marketing and Sabal Marketing Joint Venture Agreement (JVA) of August 7, 1987 and RCT Contracts with Others) and Civil and Constitutional Inalienable Rights and criminal actions (to conceal Lane/Williams and "Others Doe": Fraudulent Inducement for RCT/FUTURE to enter into the JVA claiming Lane had



contracts with Clients in section 1 and 2 Of the JVA; drug use; extortion; bribery; torts to contracts and civil rights and fair commerce practices) violating RCT and Future Marketing and “Others”.

129. Pursuant to the conspiracy, and in furtherance of the conspiracy, Defendants, during the periods of 1987 to current times did wrongfully:
- A. Obstruct Production of Contracts and Business Related Documents and Bank Records in Lane’s possession which showed monies and rights due RCT;
  - B. Obstruct Production of FBCCP and CPCS Bank records and Business Related Documents involving the Eminent Domain Case and other practices to be always available to members as records show RCT is still rightfully due as member/officer/respondent(s);
  - C. Failed to provide Honest Services and Legal Counsel;
  - D. Conspired to deceive RCT to transfer the case from Seminole County by telling RCT frauds of their alleged Honest Legal practices and procedures, that the moving of said case to Orange County would speed justice and lower costs and omitting that Bruce E. Chapin would through conspiracy with his wife, Linda Chapin as the Chairwoman of the Orlando County Commission would be able to extort and obstruct justice with her political connections with and over the: Judges; Governor Chiles; Lt. Governor MacKay (MacKay Plot to run for Governor); The Fifth DCA; The Florida Supreme Court; The FDLE; The Attorney’s General; others of Law Enforcement; and with her friends of

the Florida Bar exposed in Frauds by the U.S. Supreme Court in the 1992 American Bar Association's McKay Commission Report as per Keller v. State Bar of California 496 U.S.1 (1990); and "Others DOE" including her members of the Orange County Commission and subsequent members as Chairperson Mel Martinez and Hillsborough County Florida Employees as Pat Bean and "Others DOE" in collusion to assist Linda Chapin in her political career had to conspire and conceal the malfeasance of the O'Neill, Chapin, Liebman, Popper and Cooper P.A. due to the malfeasance of Popper he brought when joining the firm in 1989;

- E. Conspired by their Political and Financial QUID PRO QUO acts to advance the criminal scheme of LANE ET AL to advance, influence and corrupt others for Fraud on the Court and Extrinsic Frauds;
- F. On Television in 1994, at a Town Hall Meeting and afterwards RCT fully informed Jeb Bush, Ander Crenshaw, Ken Conner and defendants stated herein and "Others" of the schemes as known then and the resulting Frauds on the Courts and Plaintiffs for whom RCT speaks;
- G. In or about 1991 and since, RCT fully informed as a Whistle Blower and F.S. 617 Agent Of FBCCP/CPCS, a variety of attorneys, judges, Law Enforcers seeking legal counsel to expose Lane ET AL but being told since RCT was not an attorney he could not understand the Courts nor the Law;

130. In October 1994, at a FBCCP Quarterly Business Meeting, publicly FBCCP Administrative Pastor Nasworthy and Senior Pastor Ron Beck, as for the Finance Committee Members and Others admitted violations of the FBCCP By-Laws, Unjust Enrichment, Fraud and Omissions of Truthful Disclosure; and RCT was empowered by his Congregation and "Officer" positions to expose and prosecute for the members and Corporation those who by "fraud, collusion and arbitrariness" violated our By-Laws as actions are still being done per the By-Laws and votes of the membership exposing frauds of the "Sect" and their Agents as stated herein;

131. In pursuit of the claims as a Whistle Blower RCT ET AL began since 1987, lawsuits resulted and or to the best knowledge of this Pro Se, legally continue as from and transferred to this Seminole Court herein as:

UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

DOCKET No: 12-13892

RANDALL C. TOWNSEND, FIRST BAPTIST CHURH OF CITRUS PARK,  
CITRUS PARK CHRISTIAN SCHOOL, RELIGIOUS SOCIETY  
MEMBERS, J.D.T., J.G.T., MEMBERS OF CITIZENS CLASSES ET AL

Appellants

Vs.

HEATHER M. GRAY ET AL, THE FLORIDA SUPREME COURT AND  
NAMED JUDGES AND OFFICERS, THE FLORIDA BAR, THE STATE OF  
FLORIDA, GOVERNOR SCOTT, ATTORNEY GENERAL PAM BONDI,  
STATE ATTORNEY MARK OBER ET AL, SHERIFF DAVID GEE ET AL,

FDLE, JOHN GRANT ET AL, PATRICIA McCARTHY ET AL, DAVID H. POPPER ET AL, BRUCE E. CHAPIN ET AL, LINDA CHAPIN, MEL MARTINEZ ET AL, CHARLES SCRUGGS, III, DAVID GIBBS III, CLA, CHARLES E. LANE, JR., CHARLES E. WILLIAMS, CHARLES DENNY IV, DICKINSON & GIBBONS ET AL, JEB BUSH, GEORGE W. BUSH, RON BECK ET AL, TIM JEFFERS ET AL, JOE HOWLETT ET AL, MIKE SMOAK ET AL, PAULA POWELL, ELBERT NASWORTHY, NAMED JUDGES: 9th, 13th, Circuits 1st, 2nd, 5Th, DCA; FEDERAL JUDGES TAMPA MIDDLE DISTRICT; STEVEN HARROD, KAREN HARROD TOWNSEND, And Various Others Stated Herein per the included FRAP 26.1 and "Others DOE"

Appellee's

AN APPEAL FROM THE  
UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

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

Judge Elizabeth Kovachevich

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MOTION FOR REHEARING BY THE COURT EN BANC, denied April 2013, as Plaintiffs request this court take judicial notice of said case and related cases from which this case continues.

132. As a proximate result of Defendants' wrongful acts pursuant to the conspiracy to conceal Lane's and his co-participants illegal ongoing acts

as to: always defame RCT; limit his income, Business Practices and ethical and religious practices; and obstruct RCT appearing to be truthful regarding these claims alleged above and to be alleged by RCT with further production of documents to expose the illegal acts, frauds, Quid Pro Quo self-dealing Acts amongst Defendants and “Others DOE”, their money trail and other torts still ongoing each does by Defendant:

- A. Lane with Lane ET AL and “OTHERS DOE” still aids and abets a “False Public Light” against Townsend and does acts for frauds, kickbacks, Quid Pro Quo self-dealings, extortion, payments and conceals JVA property, documents, assets and Contract Rights belonging to RCT;
- B. McCarthy and at times Heather Gray ET AL still in her position(s) with the State Attorney’s Office aids and abets co-participants to defame and obstruct RCT’s claims with each Defendant and “Others DOE”.

133. Plaintiff RCT has performed all conditions, covenants, and promises under the contract(s) on his part to per performed or ceased practices due to threats of Williams, McCarthy, Popper and Others.

134. As a direct and proximate result of the Defendants’ wrongful acts pursuant to the conspiracy alleged above, Plaintiff has been generally damaged in the sum of in excess of \$50 million.

135. As a direct and proximate result of the Defendants’ wrongful acts alleged above, Plaintiff has further suffered emotional distress, physical distress, loss of his relationships with his children, J.D.T. and J.G.T. since

October 1999, loss of a positive public light named as “a liar”, “crazy with guns”, “molester and abuser of his children”, “charged with Repeat Violence in case 01-15813”, charged with Domestic Violence in case 01-15814, charged as dangerous in Divorce case 02-4974; charged and paid as extortion attorney’s fees and court costs as frauds that Defendants would provide honest services they knowingly never intended to perform, ; loss of his ability to practice his rights and duties per the FBCCP By-Laws to protect the FBCCP/CPCS from Frauds and Risks and Unjust Enrichment of the “Sect” and “Sect Agents”, loss of his business clients and future Clients of Future Marketing; employment and monies owed from and at Sunbelt Equipment Sales; employment as a Store Manager at Kmart Sears Holding Company; Maliciously prosecuted by Defendants, illegally detained; violated of his Constitutional Rights, and losses by Church and kids and Tax Payers as Classes of our Civil Rights and Properties.

136. As a direct and proximate result of the Defendants’ wrongful acts alleged above, Plaintiff’s has further suffered special damage in the sum of yet fully unknown dollars.

137. 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 to be judged by a jury.

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

1. Grant Motions to Amend Case as necessary upon Discovery;
2. For General Damages in the sum to exceed \$50 million to be determined by and jury trial.
3. For special damages as lost profits in the amount of in excess of \$100 million.
4. For costs of suit incurred in these actions.
5. For punitive or exemplary damages in the amount of \$100 million or to be determined by a jury trial.
6. A Jury trial of all issues.
7. For other and further relief as the Court may deem proper.

#### **COUNT -- RACKETEERING**

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

139. 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".

140. 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.

141. 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 RCT and other Plaintiffs.

142. Further, all of the Defendants have conspired to: interfere with commerce by obstructing RCT 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.



143. 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.
144. 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.
145. 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.
146. 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 —ANTI-TRUST**

147. 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 court, alleges and believes:
148. 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”.
149. 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.
150. Specifically, the Defendants by:
- A. Aiding and Abetting the frauds of Lane/Sabal ET AL 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, McDarby, (Named and included in case 13-5128, Hillsborough County Florida seeking a Restraining Order from Harassment and Stalking) and named above and included herein all “alias Law Enforcers” 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.

218. 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.

219. 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.

220. 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, the recusal of the 2013 sitting “alias justices” of the 11<sup>th</sup> Circuit Court of Appeals 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” RCT ET AL and Justice and fail to provide “Honest Services” to grant RCT Plaintiffs our Constitutional Rights ( a Fair Jury Trial, Unlawful detainment by Government Agents illegally acting under color of law, Freedom of Assembly, Speech, Religious Practices, Voting without harassment or frauds, discovery as a Counter Defendant/Respondent in order to present evidentiary evidence in a jury trial as Robinson id. Affirmed the criminal violations of each “alias law enforcer” and others DOE now defendants herein); 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" of U.S. and Florida and FBCCP Constitutional Rights as the U.S. Supreme Court per Swann v. Charlotte-Mecklenberg Bd. Of Ed 402 U.S. (1971) gives this arm of a Federal Court broad powers for Equity and Relief for all via a jury trial by fellow law abiding tax payer citizens to be served of our Rights.

### **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 RCT, 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, RCT, Randall Townsend ET AL, hereby certify that a copy of the foregoing was provided by delivery this \_\_\_\_Day of May, 2013, to the Clerk of the Court, at the Ninth Circuit Clerk of Court, 425 N. Orange Ave. Orlando, Florida 32801 and at 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 Chapins ET AL at 2022 Hoffner Ave. Belle Isle, Florida 32809 and Patricia McCarthy ET AL at 19602 Eagle Crest Drive Lutz, Florida 33549-4079 and Heather M. Gray ET AL at 10011 Cannon Dr. Riverview, 33578 .

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 \_\_\_\_\_,  
2013,**

**BY ID PRODUCED \_\_\_\_\_**

**NOTARY PUBLIC: \_\_\_\_\_**