

IN THE CIRCUIT OF THE THIRTEENTH JUDICIAL CIRCUIT,  
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA  
CIVIL DIVISION

CASE NO. 02-03812

RANDALL TOWNSEND,  
ET. AL, PLAINTIFF(S),

DIVISION: K

v.

RONALD L. BECK, (a.k.a Ron Beck), INDIVIDUALLY, REVERAND RONALD L. BECK, AS SENIOR PASTOR, OF FIRST BAPTIST CHURCH OF CITRUS PARK, (Hereinafter as FBCCP); WILLIAM T. BROWN, (a.k.a Bill Brown), INDIVIDUALLY, REVERAND WILLIAM T. BROWN, OF FBCCP AS PASTOR OF EDUCATION AND ADMINISTRATION; HERMAN MEISTER, INDIVIDUALLY, REVERAND HERMAN MEISTER, AS PASTOR OF SCHOOL MINISTRIES, OF FBCCP; GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE AND MEMBER OF FINANCE COMMITTEE AND MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER; MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP; MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMATE, AS CHAIRMAN OF DEACONS 2000-2001, OF FBCCP; JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE, OF FBCCP; GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS CORPORATION PRESIDENT, AS TRUSTEE, AS DEACON OF FBCCP; DR. LON LYNN, INDIVIDUALLY, DR. LON LYNN, AS A PROFESSIONAL MEDICAL DOCTOR, THE MEMBERS OF THE CORPORATION d/b/a, FIRST BAPTIST CHURCH OF CITRUS PARK, CITRUS PARK CHRISTIAN SCHOOL, A MINISTRY OF FBCCP,  
AS DEFENDANTS,

**PLAINTIFF'S SECOND VERIFIED MOTION**  
**FOR DISQUALIFICATION OF JUDGE**  
**AND**  
**MOTION FOR CHANGE OF VENUE**

Pursuant to Fla.R.Jud.Admin. 2.160, and §38.10, Florida Statutes and §47.101, Florida Statutes, the Plaintiff requests the disqualification of the judge assigned to this cause and moves for change of venue and states:

1. The movant is a party to this cause.
2. AFTER EVALUATION OF THE TRANSCRIPT OF APRIL 5, 2007, This

movant assures that he did not get fair hearings or rulings on these matters in the Court of Rex M. Barbas “Acting” as a “judge” of the Thirteenth Judicial Circuit as Barbas knowingly, intentionally, recklessly and negligently added unlawful acts to the pending case, conspired to suppress testimony against all Defendants as relevant to the abduction of Plaintiff’s Church, Civil and Rights to see or have parental contact of any kind now with Plaintiff’s two children since trying as an “Elected” “Whistle blower” church member to protect all children from criminal actions by pastors, the sheriff deputies, the mother, church employees and attorneys and now judges placing criminal practices still on plaintiff and plaintiffs children as forms of extortion to conceal other crimes started by the clergy and ignored by “masked sheriffs/ trustees” or finance committee members in 1997 concealing frauds revealed in the June/July 2006 partial production of Church Contract By-Law required production so frauds violate the General Voting Member RIGHTS.

Thus if Barbas was not lying to himself he would know that the only way to follow his own Position of Law that as he said on:

Page 36, Line 20:

“An equal protection claim comes as a result of a person being treated differently from other persons, usually because of race, creed, color, sex.

Mr. Townsend: Religion.

THE COURT: Also religion.”

And Page 37 line 9:

“The only time the Government, our Government, our the courts become involved in church matters is when those church matters are similar to those solved in civil matters; i.e, a malicious prosecution where a church would institute an action against you that is unfounded, then you would have an action against them for doing that. That is something an individual can do, not just a church. In that case, we get involved in it.

But whether you are allowed to worship at a particular church or not, whether that church allows you to worship, that is strictly ecclesiastical in nature and our courts are not allowed to get involved in that.

MR. TOWNSEND: Under 617, Your Honor, in order for a person to be removed, there has to be a following of the Constitution and a following of the BY-LAWS of the organizations. What those document in 2006 showed is that that process was never done. So, therefore, my being banned from the property and being told if I even came near the ---

THE COURT: How a person is banned from a church—and there are all kinds of cases involved in the federal system and quite a few from the Mormon Church, from the Roman Catholic Church. And because there is a means within that church, we will not involve ourselves and how persons are removed from those churches.”

Therefore then Barbus or a Court of Equity is to put the Church General Voting Members, the FBCCP Corporation and these Plaintiffs back in their original positions before “Masked” “Unlawful” sheriff deputies as extensions of alleged “Legal Government” intervened in 1997, with their “masked conduct” to promote and protect their personal agenda to “never make my pastor look bad” and then did fraud, lied to, lied about and created “false evidence” and hired “hired guns” to promote the Schism frauds to the General Voting Members, and against this Representative of the Corporation, the Children and his Family and his BY-LAW and Contract and BY-LAWS RIGHTS and thus their “masked status” gave “Benefit to Clergy” and “masked” their status when this Plaintiff Townsend “exposed the frauds” and yelled “Odious and Outrageous” as a jury will at what this “Clergy” and “sheriff deputies” did in the fraudulent actions being in 1997.

and “ONE MINUTE BEFORE” the fraud of clergy as Townsend alleged was not exposed by “masked”

deputies who due to their own “personal” agenda to “never make my pastor look bad”

did unlawful acts and violated the Florida Statutes, U.S. and State Constitutions and the Church By-Laws and Florida Statutes §617 and §895 during 1997 through current times.

- 3. Plaintiff advises the court that the Supplemental Pleading filed on August 10, 2006, in this Circuit Court Case shows now more core issues, as of one of several Judges now as defendants of this underlying complaint as intentional violators of Federal law and State Law and of Rules of Civil Procedure and one that has shown acts of bias, prejudice and total disregard for evidence and facts of this case herein as the decision of this court allowed even after a full and complete confession by the Defendant Attorney former Judge Charles Scruggs in February, 2006, and the letter of February 16, 2007 being read into the record, that Charles Scruggs in collusion with Attorneys Denny, Grant, Gibbs, Turmel, Rolfes, Gray, State and Court Officials in breach of contract and trust intentionally lied and did "fraud to the court" in hearings and testimony and to this Plaintiff as Client of Scruggs and as now a former client and opposing party and the court totally ignored the exhibits (even as told by Judge Crenshaw to produce within 30 days of the Church Documents finally produced in June/July 2006 and proved the frauds of Denny alleging to be Counsel for the Church Corporation and per the By-Laws speaks for the General Voting Member that Townsend is now proved still a "General Voting Member" and "Officer" never properly per the law voted out of office or membership and Denny is a fraud to all General Voting Members Rights being violated by the Schism of pastors and sheriff deputies) produced to the Pleadings in cases 01-15813, 01-15814, 02-03812**

**and 05-0911 and 05-9605 and all other cases as shown and the court ignored the case facts now proved from the production of First Baptist Church of Citrus Park and Citrus Park Christian School from the ORDER of Judge Marva Crenshaw on May 10, 2006, for records productions of June and July 2006, that fully show all proofs of allegations and damages caused by the incompetence of the courts, judges, attorneys and law enforcement and law enforcement acting as Church Corporation Trustees in violation of the Church Corporation By-laws and in violation of Florida Statutes 617 and 895 and multiple other Statutes and Laws and that attorney Scruggs non compliance and frauds to Plaintiffs was a direct fraud and violation of rights and violations of Statutes and Contracts of this Plaintiff Still as a member of the Church Corporation and with Florida Statutes rights to all corporation records per Statue 617.1601 through 617.1605 and that all actions by any attorney, court, law enforcement and others is in violation of “NO LAWS SHALL IMPEDE THE OBLIGATION OF A CONTRACT” and in violation of UNITED STATES CODE TITLE 42 Section 1983 and Title 18, Chapter 13 Sections 241, 242, 245, 246, 247; Chapter 19, Sections 371, 373, and other Chapters as 11, 21, 31, 41, 43,47, 65, 73, 79, 93, 96, 110, 110A, and of Title 18 and other sections and that all Judges, Court officials and State Officers and Law Enforcement officers have personal motives and lack probable cause to still damage this Plaintiff Speaking for the Contract Vested Rights of the General Voting Members of the Corporation. Plaintiff even reported factual proof of the bias and prejudice and personal motives of now former Governor Jeb Bush and of now former Department of Education,**

**Attorney General and now Governor Charlie Crist having bias and motives against their OFFICERS Duty to obey the Laws of Florida, and Federal and Rules of All Courts. Even Judge Barbas connected the cases as of all Hillsborough County Courts and these cases thereby related but Barbas ignored his own words in violation of Rules of Law as a point of Judge Crenshaw.**

4. Plaintiff's fear is based on these facts as stated in Plaintiff AFFIDAVIT enclosed herein as proofs that this Judge appears to be favorable and biased towards the Defendants in this Malicious Prosecution Count case and attempted **Amended Complaint** to add additional Counts and states the original attorney allegedly defending and prosecuting and protecting all rights of this Plaintiff was a former Judge for this same Circuit Court and still practices as an attorney in this Circuit and transcripts and exhibits prove Defendants in this case as the "adverse party has an undue influence over the minds of the inhabitants of the county" and these courts because to review all facts and issues of fair justice will lead to prove that this acting attorney former Judge, Charles Scruggs has practiced this undue influence and frauds to and on these courts in multiple Exparte communications with this Circuit Court Judges and in open testimony confirmed in the Court transcripts included as exhibits to this case file to the detriment of this Plaintiff his former Client.
5. The assignment of this judge allegedly per the September 22, 2006, **ORDER** of

Judge Crenshaw saying:

**"THIS CAUSE** coming before the Court on the Courts' own Motion for Recusal, and the Court being advised in the premises, it is hereby:

**ORDERED AND ADJUDGED** that the undersigned Circuit Judge does hereby recuse of herself in this cause and the Clerk of the Court is and directed to reassign this case pursuant to the blind rotation system."

This trickery of Judge Crenshaw to recuse herself when realizing her own JURY INSTRUCTIONS entrapped herself and all Defendants shows direct additional “nuisance” and “recklessness” or “collusion” either by the incompetence of the court system or by an additional attempt at collusion as stated by facts in the Court records as shown in the **Third Amended Complaint** filed August 10, 2006, in this Court as shown parts of issues causing the Recusal of Judge Crenshaw as Judge Stoddard and now Judge Barbás and Judge Sierra should also recuse themselves as all judges of this Thirteenth Circuit willfully conspire to deny by Extrinsic Fraud “NOT EVEN THE ALLOWING OF FILING COURT PAPERS” IS NOW THE excuse GIVEN BY BARBAS TO DISMISS THIS CASE WITH PREJUDICE EVEN AFTER BEING QUOTED TO JUDGE BARBAS THE WORDS OF JUDGE CRENSHAW ON MAY 10, 2006, in the **CASE MANAGEMENT CONFERENCE HEARING:**

PAGE 75, LINE 15:

“Within thirty days after the receipt of that discovery, Mr. Townsend, you are to put in writing any additional discovery requests that you have; and I want you to be specific. ... As I said, this record is replete with repetitive filings; so what you may do is go to the court file and refer to things that have already been filed.

Now after I receive your request, if any, for specific additional discovery, I will review it and make a determination as to whether or not the Court finds it should be permitted. All right. And for the purpose of advising the parties of my ruling, we will then have another case management within 120 days from today, which means that sometime in the fall, we will be ready to hear the MOTION for Summary Judgement.”

6. All previous **ORDERS** by this Judge and others have and are being litigated in other Courts as part of violations of Plaintiffs Civil, Contract and Constitutional Rights.

WHEREFORE, the Plaintiff respectfully requests the disqualification of the assigned judge from further presiding in this case and request an ORDER FOR CHANGE OF VENUE to SIXTH JUDICIAL CIRCUIT COURT or UNITED STATES FEDERAL COURT MIDDLE DISTRICT OF FLORIDA.

I willingly state that the above is true and will gladly raise my hand on oath and testify to the same in full.

Respectfully submitted,

Randall C. Townsend, Pro Se  
P.O. Box 21,  
Odessa, Fl. 33556  
941 350 2677  
By: \_\_\_\_\_  
Randall C. Townsend

Certificate of Service

I hereby certify that a copy of the foregoing was provided by U.S. Mail this \_\_\_\_\_ day of \_\_\_\_\_ 2006, to First Baptist Church Citrus Park as Corporation and as said members as Defendants at 7705 Gunn Hwy. Tampa, Florida, 33625 via their attorney Dickinson & Gibbons, P.A. Post Office Box 3979, Sarasota, Fl 34230 and to the clerk of this court at EDGECOMB COURTHOUSE, 800 East Twiggs Street, Tampa, Florida, 33602. And to Judge Barbas at EDGECOMB COURTHOUSE 800 East Twiggs Street, Room 527, Tampa, Florida, 33602.

\_\_\_\_\_  
Randall C. Townsend

BEFORE ME, THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED RANDALL C. TOWNSEND, PRESENTING IDENTIFICATION, WHO UPON BEING DULY SWORN AND CAUTIONED EXECUTED AND STATED THE FORGOING IN THE ABOVE DOCUMENT IS TRUE AND IS 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 \_\_\_\_\_, in \_\_\_\_\_.



IN THE CIRCUIT OF THE THIRTEENTH JUDICIAL CIRCUIT,  
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA  
CIVIL DIVISION

CASE NO. 02-03812

RANDALL TOWNSEND,  
PLAINTIFF,

DIVISION: K

v.

RONALD L. BECK, (a.k.a Ron Beck), INDIVIDUALLY, REVERAND RONALD L. BECK, AS SENIOR PASTOR, OF FIRST BAPTIST CHURCH OF CITRUS PARK, (Hereinafter as FBCCP); WILLIAM T. BROWN, (a.k.a Bill Brown), INDIVIDUALLY, REVERAND WILLIAM T. BROWN, OF FBCCP AS PASTOR OF EDUCATION AND ADMINISTRATION; HERMAN MEISTER, INDIVIDUALLY, REVERAND HERMAN MEISTER, AS PASTOR OF SCHOOL MINISTRIES, OF FBCCP; GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE AND MEMBER OF FINANCE COMMITTEE AND MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER; MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP; MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMATE, AS CHAIRMAN OF DEACONS 2000-2001, OF FBCCP; JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE, OF FBCCP; GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS CORPORATION PRESIDENT, AS TRUSTEE, AS DEACON OF FBCCP; DR. LON LYNN, INDIVIDUALLY, DR. LON LYNN, AS A PROFESSIONAL MEDICAL DOCTOR, THE MEMBERS OF THE CORPORATION d/b/a, FIRST BAPTIST CHURCH OF CITRUS PARK, CITRUS PARK CHRISTIAN SCHOOL, A MINISTRY OF FBCCP,  
AS DEFENDANTS,

**PLAINTIFF'S AFFIDAVIT**

**Comes Now, Randall Townsend, Pro Se, and files this PLAINTIFFS**

**AFFIDAVIT and states,**

1. PLAINTIFF PRO SE, RANDALL TOWNSEND, is over the age of 18 years of age.
2. Plaintiff Pro Se, herein as Plaintiff makes these statements in good faith.
3. Plaintiff as movant herein states, I do not believe a fair hearings process has been shown to the issues presented by this Plaintiff but Judge Barbas has shown prejudice and is favorably disposed to the Defendants herein for as to prove the issues in fairness and justice in this case this Plaintiff will and has to prove that his former

Attorney and as a former Judge for this Circuit, in the hearings before this court as prep for a fair trial has practiced fraud on the courts of this Circuit and the attorney former Judge has done fraud on this Plaintiff as his former client to these courts.

4. Plaintiff Pro Se, herein as Plaintiff was as RESPONDENT in case 01-15814, Karen Townsend v. Randy Townsend, and case 01-15813, Ron Beck v. Randy Townsend and Karen Harrod Townsend v. Randy Townsend, Case 02-4974, a divorce case and did hire Charles H. Scruggs, III. P.A., Charles H. Scruggs, III Esquire, as Charles H. Scruggs, III, an attorney and as a former Judge of the Thirteenth Judicial Circuit and to represent to the fullest a defense for this respondent now Plaintiff Pro se, against all allegations and frauds and charges alleged by Karen Townsend and her employer these Defendants herein in this case 02-03812, as her co conspirators and co petitioners in the written affidavits and verbal testimony presented to the court. Plaintiff is now in litigation also against this former Attorney Charles Scruggs in the handling of all matters involving the representation for this Plaintiff since the summer of 2000, and without proper due process cannot prove the representation of this attorney was a “fraud” to his own client to protect the attorney’s “personal conviction” “to not make a church look bad” and this greatly was withheld from the knowledge of this client and did fraud to this client for which now this Plaintiff seeks redress from these Defendants and the former attorney for Plaintiff, Scruggs and justice in the courts from all who have done fraud to the court and on this Plaintiff and his children as Defendants and attorneys violate this Plaintiff and his children rights per the Constitution of the United States, The Constitution of the State of Florida, the Contract known as the BY-LAWS of the First Baptist Church of Citrus

Park (FBCCP) of this Plaintiff as a member with rights and violation of the Marriage Contract ended by extortion and duress and frauds of judges, attorneys, pastors and FBCCP church employees and Citrus Park Christian School employees and members in an effort of concealment, fraud and extortion to conceal the criminal conduct of themselves and others as revealed by the production of the FBCCP Corporation Records in part and in part compliance to the Court ORDER of Judge Crenshaw on May 10, 2006, and failure by Judge Crenshaw to award sanctions against defendants for now proved almost 10 years of illegal activity and violation of BY-LAWS, Florida Statutes and incompetence and BREACH OF CONTRACT and defiance to the legal system aided by incompetent and intentional illegal advice of attorneys and law enforcement and judges as proved in the Amended Complaints.

5. Plaintiff states that on February 9, 2006, before Judge Ralph Stoddard, Defendant Charles Scruggs, III, did make statements to the court that confessed the negligence and fraud to the client and a transcript of this hearing is available to be presented for the file of this case to confirm Defendant Scruggs admission of the facts of this case and to prove that Scruggs own confessions to Judge Stoddard confirm that the illegal actions by Sheriff Deputy Howlett on November 15, 2001, did cause Scruggs to intentionally show prejudice and bias and fraud on this Plaintiff his client and to the Courts and this "nuisance" and "recklessness" shown to Judge Stoddard revealed his collusion with his former colleague as a judge of this Thirteenth Circuit.
6. Judge Stoddard has shown acts of prejudice, favoritism, and bias by statements in favor of the Defendants and the attorney for this Defendant in this THIRTEENTH JUDICIAL CIRCUIT.

7. Judge Stoddard has also been tainted by the acts of Attorney Scruggs as a former Judge for this CIRCUIT and as proof this Plaintiff states that attorney Scruggs has not done one Motion for Discovery since July, 2000, through September 2003, and gave false testimony to the courts to cover up his fraud to the court and attempts to use fraud to get injunctions against his own client this plaintiff that has now kept this Father from seeing his children since November 2002, due to these injunctions since November 2001, attempted by Fraud not wanting Attorney Scruggs to expose to the courts and thereby gaining an additional Injunction in 2003, against this Father/Plaintiff to suppress this Father as Plaintiff from discovering the abuse and violations of §39, Florida Statutes; §768.72, Florida Statutes; and §458, Florida Statutes.
8. The exhibits of the duties show in 2000-2003, Attorney Scruggs was hired to perform for this Plaintiff and Plaintiff's minor children and yet neglected has been proved was proper legal process and expectations of success for rulings from these courts and this has been proved in trials or hearings before Judge Palomino, Judge Arnold, Judge Crenshaw, Judge Gomez and Judge Barton and yet Judge Stoddard refuses to allow Plaintiff to state his proofs of these other rulings as evidence by these other Judges to show the intentional refusal by Attorney Scruggs to serve the now former Client as this Plaintiff, as attorney Scruggs pretended through his fraud to do as shown in the Pleadings to Judge Stoddard, in Case TOWNSEND v. SCRUGGS, 05-0911, show were intentional frauds and damages against this Plaintiff and these intentional acts "not make a church look bad" did benefit these CHURCH Defendants in this case.

9. The Court has displayed shock and alarm at the charges made at this case hearings yet rules in favor of the Defendants despite the visible shock of the lack of care actions done by Defendant Scruggs against his former client and Plaintiff's children harmed by these Defendants herein.
10. The Court of Judge Stoddard on May 8, 2006, Hearing heard for the first time key evidence of frauds and conspiracy by Defendants and Defendants Counsel as presented in newly discovered legal positions by production of documents how Plaintiff was victimized by the Defendants in this Case by not allowing this father to see his children by frauds to the courts of Defendants Beck, Howlett, Meister, Brown, Leatherman, Scruggs, Denny, Karen Harrod Townsend and just as the **ORDER** FOR PRODUCTION OF DOCUMENTS by the court of Judge Crenshaw on May 10, 2006, confirmed and revealed factual proofs of the claims of this Plaintiff as a Church member illegally attempted to be deprived of membership rights per Florida Statutes 617, yet the court refused to accept that the findings in these documents showed extortion, violation of civil rights and fraud yet Judge Stoddard refused to accept evidence as scheduled for the hearing to be presented to the court.
11. The verbal **ORDER** of the Court of Judge Stoddard on May 8, 2006, stated changes to the intended hearing on the issues from the prior **ORDER** of the court and schedule to hear all pending or needed actions as shown for hearing all pending MOTIONS on May 8, 2006, for any additional discovery or non compliance to previous court ORDERS and Judge Stoddard refusing to accept Plaintiffs properly filed MOTIONS and statements made shows prejudice and bias of the Judge going forward only to a Defendants Motion for Judgement while this Court of Judge

Stoddard refuses to allow Plaintiff to pursue needed DISCOVERY not provided by Defendants as the Court had previously ORDERED to the Defendants to produce on May 10, 2006. This shows a reversal of the attitude and regard for this Court to seek all truthful evidence to be presented to any honorable COURT.

12. The May 8, 2006, verbal statement by Ralph Stoddard acting as a Judge stated that “Plaintiff did not hire Scruggs” allegedly for the positions this Plaintiff claimed to “clear plaintiffs reputation” and get the “Church Records” and “protect Plaintiffs children” yet all produced Corporation Records, Transcripts, Affidavits and yet to be allowed Depositions and discovery from over 1000 witnesses will and did confirm that Attorney Scruggs III, Denny IV, Gray, Gardner, Gibbs III, Rolfes and Turmel and Solomon and others have knowingly, recklessly, intentionally and negligently conspired to do frauds to the courts and to this Honorable Plaintiff and his children and naïve church general voting members.
13. The September 7, 2006, verbal Actions and words of Judge Crenshaw continues the violation of Florida Statues 775.03, **BENEFIT OF CLERGY** and prohibits this now newly discovered still member as Plaintiff from elections of officers, discovery of financial records and advancement of all religious rights, parental rights, social rights, and freedoms of speech, but protects BENEFIT of Clergy rights to continue the discovered violations and Breach of the Corporation Contract known as the BY-LAWS, the U.S. Constitution and the State of Florida Constitution over the rights of this Plaintiff and his children allegedly forced from the marriage, Congregation and membership by the pastors schism and sheriff deputies allegedly voted properly as TRUSTEE’S, however the newly released documents show the frauds of these Sheriff

Deputies and of the attorneys and the alleged pastors and alleged Judges as also did the Verbal rulings of Judge Stoddard on May 8, 2006, and proves the collusion and frauds by the judges in the Thirteenth Circuit to aid and assist their former colleagues and attorneys do continued harm and injustice against this honorable Plaintiff trying to protect innocent church and school children and himself and general voting members of the FBCCP from now over 11 years of frauds of Beck, Meister, Karen Harrod Townsend and all other defendants as proved in this Case now proved guilty of child endangerment, child abuse, child neglect, criminal child extortion, and malpractice by Doctors, lawyers, judges, Corporation employees as each knew the “risk” and failed to prevent the “risk” to these Plaintiffs and others as children of the Church and School and intentionally did actions against children to continue the criminal acts of clergy and lawyers and thereby should be ordered to jail by any competent judge not yet in conspiracy by the frauds of Beck and Scruggs and Denny and others having had a fiduciary relationship and duty to this plaintiff and the children but who knowingly, willingly, intentionally, recklessly and negligently chose to violate the fiduciary duty to this plaintiff and children and gave “benefit to clergy” in violation of the Statues of Florida and the United States Code.

14. The Order gives benefit to clergy by limiting exposure of evidence of all criminal acts and by those who acted in conspiracy with Defendant Beck, et. Al. Causing additional frauds and illegal acts by Corporation members, judges, attorneys, law enforcement choosing to act intentionally, knowingly, willingly and recklessly to continue the benefit to clergy over the rights of the plaintiff now proved to be true to the truth of service to the corporation of the Church By-laws, Members, the attorneys

and the Courts and law enforcement having acted per the law as now revealed from the concealed produced documents.

15. The ruling of this Judge violates his own order and shows collusion to protect and limit the exposure of violations of Laws, Rules of Civil Procedure, Rules of Criminal Procedure and Breach of the Church By-Laws as a Contract to still naïve members and is in conflict with this Courts actions of February. 2006, and May 8, 2006 and the rulings of other courts on these pending matters.
16. The ruling of this Judge not allowing Plaintiff to pursue his legal obligations under Florida Statues 617 to seek removal of the alleged properly elected Corporation Officers violates the F.S. 617 laws and gives Benefit to Clergy and Sheriff Deputies not properly following State laws and the Orders of the Court of May 8, 2006, then **ORDERED** to produce to this now known member the Corporation records further revealing the theft from the Corporation and violations of the Voting Members and By-LAWS allowing these alleged officers and attorneys to continue to operate illegally even in the allegedly honorable Church and in the allegedly honorable court while continuing the frauds to the General members and this Plaintiff and other courts while child abuse and neglect continues.
17. Not taking Judicial Review of the other cases per the MOTION filed with this Court ignores the law, the rights of this Plaintiff, and evidence and proofs of facts and proofs for the findings of facts and prevents the presentation of all evidence to the Courts and other naïve parties as required to be shown the truth of all evidence and facts as even before a Summary Judgement may be heard or presented on all legal issues.



18. The fact that evidence of violations of UNITED STATES CODE TITLE 18, as shown herein and per the evidence yet to be filed as judges refuse to allow this Plaintiff by their collusion not to file evidence, proofs or Amended Complaints or gain still needed complete discovery shows that attorneys, judges, law enforcement, and other defendants could and should be prosecuted and could per a jury get multiple years in jail and possibly life sentences places all Thirteenth Circuit Court judges in potential positions more than already shown as “biased” and “prejudiced” and in Contempt of the Courts previous positions, ORDERS and procedures.
19. The Words of Judge Barbas and his allowing Attorney Denny to misrepresent even the contents and Motions and Orders of the TITLES ONLY of these same MOTIONS AND ORDERS allegedly “without EQUAL PROCESS OR EQUAL PROTECTION” of the Honorable Courts show the agenda of Rex Barbas was outside an HONORABLE DUTY OF A JUDGE and that his motives were of bias and frauds to conceal violations by Denny and all other previous defendants as the Exhibits stated in the MOTIONS and ORDERS referenced by Judge Barbas in the RECORD reveal the damages and frauds of and on the Court and of the Plaintiffs and even the Defendant Corporation The FIRST BAPTIST CHURCH OF CITRUS PARK a NOT FOR PROFIT CORPORATION but divested of CORPORATE OPPORTUNITY by the Defendants and others.
20. Despite Judge Barbas being warned of the pending Federal Case and Concerns of “Equal Protection” and the Case Law of UMBERGER v. JOHNS and of HEAD v. LANE 495 So2d 821,(Fla.App.4 Dist. 1986) that the contract conflict of interest of Dickinson & Gibbons and attorney Denny have allowed benefit of clergy Beck to

deprive others and of the Plaintiffs and of the Corporation, Barbas intentionally remained biased and outside the RULES OF LAW to do the intended purpose and Quash all truth of this case and protect himself and the “Good Old Boys” rather than do the RULES OF LAW!

21. Rex Barbas at the reading of the letter of February 16, 2007, from Attorney Charles Scruggs did even show shock and then a smile at the words expressed by alleged the Attorney protecting these Plaintiffs but was and is still doing exparte actions as a former Judge and in violation of Rules of Judicial and Attorney Client Contract continues to practice his “personal belief not to make a church look bad” and thereby violate the Corporation and these Plaintiffs in violation of Florida Statues 617 and specifically 617.0304, and denied equal protection of a deputy Howlett who was per the documents shown never elected per the General Voting Members of whom Howlett deprives equal protection and rights by his mask and by the mask of other alleged law enforcement to not restrain and stop the ongoing frauds now even of Rex Barbas claiming even after all included herein verbal argument to the Judge on April 5, 2007, to be an Honorable Judge.

THEREFORE, BASED ON THE BIAS, PREJUDICE AND REFUSAL OF THE COURT AS STATED HEREIN THIS PLAINTIFF MUST MOVE FOR REMOVAL OF THIS JUDGE AND REMOVAL OF THIS CASE TO UNITED STATES FEDERAL COURT MIDDLE DISTRICT OF FLORIDA.

I willingly state that the above is true and will gladly raise my hand on oath and testify to the same in full.

Certificate of Service

I hereby certify that a copy of the foregoing was provided by U.S. Mail this \_\_\_\_\_ day of \_\_\_\_\_ 200, to First Baptist Church Citrus Park as Corporation and as said members as Defendants at 7705 Gunn Hwy. Tampa, Florida, 33625 via their attorney Dickinson & Gibbons, P.A. Post Office Box 3979, Sarasota, Fl 34230 and to the clerk of this court at EDGECOMB COURTHOUSE, 800 East Twiggs Street, Tampa, Florida, 33602. And to Judge Barbas at EDGECOMB COURTHOUSE 800 East Twiggs Street, Room 527, Tampa, Florida, 33602.

\_\_\_\_\_  
Randall C. Townsend

BEFORE ME, THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED RANDALL C. TOWNSEND, PRESENTING IDENTIFICATION, WHO UPON BEING DULY SWORN AND CAUTIONED EXECUTED AND STATED THE FORGOING IN THE ABOVE DOCUMENT IS TRUE AND IS 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 \_\_\_\_\_, in \_\_\_\_\_.  
BY ID PRODUCED\_\_\_\_\_.

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

**Respectfully submitted,**  
Randall C. Townsend, Pro Se  
P.O. Box 21,  
Odessa, Fl 33556  
941 350-2677  
[www.Judgeoneyourself.com](http://www.Judgeoneyourself.com)  
[www.Jfyrt59@hotmail.com](mailto:www.Jfyrt59@hotmail.com)

\_\_\_\_\_  
Randall C. Townsend