

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

RANDALL TOWNSEND,
PLAINTIFF,

CASE NO: 02-03812

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 SHUMANTE, 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,

**PLAINTIFES RESPONSE IN OPPOSITION
TO DEFENDANTS
MOTION FOR SUMMARY JUDGMENT**

COMES NOW RANDALL TOWNSEND, PLAINTIFF PRO SE IN THE ABOVE-ENTITLED ACTION AND HEREBY RESPONDS IN OPPOSITION TO THE MOTION FOR SUMMARY JUDGEMENT FILED BY DEFENDANTS, RONALD L. BECK and FIRST BAPTIST CHURCH OF CITRUS PARK AND WOULD SHOW AS FOLLOWS:

1. This response in opposition is made on the grounds that multiple questions still remain pending for this court and for a jury which block a summary judgment:

A. FOR THE COURT to rely on Jury findings:

(1) Just staying in the Malicious Prosecution Claim to prove “Probable Cause” and “level of and type of malice” of whom and by whom as both points which are based on frauds and thus involve “jury” findings-- THESE ISSUES TO PROVE PROBABLE CAUSE BASED ON FRAUDS AS BECK ALLEGED FROM HIS “PERSONAL KNOWLEDGE “ AS A MARRIAGE COUNSELOR AND EMPLOYER TO THE WIFE, AND COUNSELOR TO THE PLAINTIFF’S CHILDREN AS STUDENTS OF THE CPCS SCHOOL THAT PLAINTIFF-----

“WAS DOING AND DANGEROUS TO DO MORE CRIMINAL ACTS” TO:

a. Law enforcement—Howlett, Jeffers, Corbin, Smoak, Kieras, Sahr, Willingham, and others of Law Enforcement both members and non members of the Church and School. And these Law Enforcement officers spread these “false statements” spread from Beck and Meister and Leatherman and the now former wife who in December 2005, under oath when finally challenged for the frauds recanted her testimony coerced to keep employment by Beck and Meister and to cover up her serious criminal acts spread charges to:

(1) Other Law Enforcement officers

- (2) **The neighbors around the Citrus Park and Odessa area**
 - (3) **All throughout Hillsborough County friends and family**
 - (4) **Plaintiff Employers (the Citrus Park Town Center mall and Kmart)**
 - (5) **Curtis Baughman of Victims Assistance**
 - (6) **The State Attorney's office**
 - (7) **Children and Family Services**
 - (8) **The Courts, and**
 - (9) **Many others, some still unknown to ruin Plaintiff's reputation**
- b. **THE EMPLOYEES OF FBCCP AND CPCS AND GENERAL CHURCH AND SCHOOL MEMBERS and the Community and spread this to people covering the country (confirmed by testimony from pastors)**
- c. **THE COURTS to cover up the frauds Beck told to Law Enforcement and attorneys as confirmed by the fraud of the ruling of Judge Palomino's alleged rulings on November 15, 2001, as confirmed by:**
- (1) **Verbal testimony in this court by Charles Denny**
 - (2) **Written First Affirmative Defenses by Charles Denny**
 - (3) **Transcript proved testimony of the testimony given to the court of Judge Timmerman on January 30, 2003, by the now former wife, Attorney Stacey Turmel and Attorney Charles Scruggs**
 - (4) **Transcript proved testimony by Attorney Stanford Solomon to the courts of Judge Gomez and Judge Sierra and**

(5) **Plaintiff believes done Ex Parte by Attorney Scruggs and Attorney Heather Gray to several courts even the Second District Court of Appeals TO RECEIVE AN INJUNCTION FROM NOVEMBER 2-15, 2001, WHICH FLOWS TO INJUNCTIONS THAT STILL BLOCK THIS FATHERS RIGHTS TODAY (now over 10 years after Beck started his plan), TO SEE HIS KIDS TO LEARN AND KNOW AND THEN REPORT ALL THE CHILD ABUSE DONE TO THESE CHILDREN PER FLORIDA STATUES 39, 61, 768, 827, 914, 941, 458 and many others AND THEN VERBAL TESTIMONEY OF BECK OF FRAUDS OF ALLEGING PLAINTIFF AS “STALKING” “SHOWING ACTS OF REPEAT VIOLENCE” and a “LIAR” OF JUDGE PALOMINO AND THEREBY A “STALKER”** Ruling on the Second Amended Pleading adding with Beck and the First Baptist Church Corporation the individuals detailed in the Second Amended Pleadings as CO-DEFENDANTS as admitted by Beck per the transcript of Beck in the hearing before Palomino, that he was in the court having filed the action and wishing it to be continued on behalf of himself and his corporation members not just to serve as spokesperson for the Corporation, but Plaintiff alleging Beck to be speaking for Beck, and his “SCHISM” who had gained control by manipulation of facts, financial data, and false presentation of “marriage issues” and “illegal conduct” and alleging “fraud” by this plaintiff as a dutiful member trying to find missing money now found and through trickery(using a Trustee/Sheriff Deputy and attorneys) put back into the reports for the Corporation in most part and expose now proved frauds by Beck and the “Schism” in the court of Judge Barton again

on March 28, 2006, which shows that about \$4,000,000.00 has been wasted on an unusable plan moving the church and school property at 7705 Gunn Highway to the new property at 18105 North Gunn Highway to new buildings that this County will not approve the “special use permits” this Plaintiff told the Pastors in 1997 would be blocked without approval of the Keystone Park Civic Association.

AS BECK SINCE 1995, being told by Attorneys that since he was a “pastor” he was above the jurisdiction of the laws and he has used this role in falsehoods to spread vile talk about anyone he chooses who get in his way to build up his pride and pockets at the expence of the Corporation and his family and people he allegedly serves to allegedly be helping the same people and families that his same actions as a alleged “priviledged” “pastor” he intentionally destroys. How “ODIOUS AND OUTRAGEOUS” FOR A JURY!

(2) Ruling on the Second Amended Pleading showing the proofs TO THE LEVEL TO SHOW THE ACTIONS WERE WITH THE TYPE OF ACTUAL OR DIRECT OR INTENTIONAL OR NEGLIGENT “MALICE” OR DEGREE by including documents of the courts and transcripts of hearings as proofs of the tort actions and malice done by these defendants and the co-defendants

(3) Ruling to allow to show this Plaintiff as a still contested point of Plaintiff’s “membership” of the Church being removed from this Plaintiff not being done without violations of the civil rights or State Statues rights of Direct or Derivative action per Florida Statues 617, legally seeks to show either in a Direct or Derivative action fraud by Corporation Officers acted in Violation

of the Corporation Policies and BY-LAWS that Beck, and the “schism” as the co conspirators listed, the yet unnamed co conspirators and members and the officers and the Corporation as a whole and as individuals have motives of loosing their jobs, loosing their alleged “christian” and “pastors” reputations, going to jail for their practice of hate crimes against the Corporation and against this defendant/respondant/now plaintiff pro se, loosing nonprofit corporation status, going to jail for:

- (a) child abuse of church members and school students,
- (b) for violations of tax laws and state filing laws, and theft
- (c) going to jail for giving false reports to police officers,
- (d) going to jail for perjury,

and proofs of their deceptions now loosing their continued appeals to build at 40 plus acres north Gunn Highway property the proposed new school which this Defendant/Plaintiff Pro Se father/Long Range Planning Committee Chairman said would not be allowed by the community and the county and going to jail for not reporting and mis-appropriation of not for profit corporation funds as this member(or contested non member) /defendant/respondant/plaintiff now pro se has proved with the documents attached to the pleadings.

(4) Rulings on the multiple Motions for Discovery of these above issues as first requested for the courts assistance in the Complain filed in April 2002 and attempted to be filed in 2000, but for the frauds of Attorney Scruggs.

(5) Ruling on the Second Amended Pleading showing proofs of damages of the INJUNCTIONS which now have prevented this father from being with or seeing his kids now since November 2002 **and before as Beck and his co-defendants did since 1995** as will be proved in depositions and interrogatories once this court stops letting Denny and other lawyers fraud the courts that the information to be gained is not privileged or trade secret or not likely to lead to other causes of action but will expose the “ODIOUS AND OUTRAGEOUS” conduct done by his criminals in the church/school and in the public streets and malls and even in the lies told to the courts in full defiance of using perjury in affidavits and in open testimony and in frauds presented by their attorneys.

(6) Ruling on Sanctions requested by this Plaintiff as this Plaintiff has yet to receive one document requested from Attorney Denny or his Defendants and Plaintiff has proved to this court by other means of discovery that the Frauds of Beck flowed to others and to Denny to this Court and that even this caused the fraud to this court to not understand the truthfulness in all answers given to this court in the Interrogatories and Request For Admissions answered and sought by this Plaintiff trying to unravel these multiple and voluminous amounts of frauds and by what type of action, (direct or derivative) or as Plaintiff or respondent turned plaintiff from a malicious prosecution claim this Plaintiff tries to answer truthfully and prove or discredit all the now over 10 years of frauds coming from Beck and a unlimited host of others.

THEREFORE THIS PLAINTIFF STILL BELIEVES AFTER TALKING

WITH THE CIVIL RIGHTS ATTORNEYS OF THE ATTORNEY
GENERAL OFFICE THAT THE \$924.00 paid as sanctions and these threats
of additional sanctions by Denny is extortion to tamper with the court to
promote frauds of the clients through illegal trickery of the courts rules to
threaten this victim, witness, honorable citizen who has yet to fraud this court
but appears to be because of yet still uncovered materials this Plaintiff seeks
from Beck and the Corporation and others in his "schism" that Denny now
has by fraud to the courts assisted his clients do additional frauds to these
courts in violation of the oath or the code of conduct for attorneys.

(7) And many more yet unsettled facts as discovery of the documents requested
since 199___'s have been blocked by Defendants and now the lawyers will
show additional crimes which harmed this defendant/respondant/plaintiff
being called a "liar" and "dangerous from a stress related breakdown" but will
show this Randall Townsend was telling the truth ON ALL MATTERS AND
STILL IS PER THE LAW ACTING VERY SANE AND DETERMINED TO
EXPOSE THE FRAUDS AND THE CRIMINALS BEHIND ALL FRAUDS!

(8) RULING TO ALLOW THIS PLAINTIFF TO PLEAD ALL CAUSES OF
ACTIONS AGAINST ALL DEFENDANTS AS PLAINTIFF WAS
TAINTED AND VICTIM OF FRAUD BY ATTORNEYS BLOCKING
PLAINTIFF'S KNOWLEDGE OF CAUSES OF ACTIONS OR HOW TO
PROVE ELEMENTS OF THESE CAUSES OF ACTIONS BY EXTRINSIC
FRAUD TO THESE COURTS AND LAW ENFORCEMENT AGENCIES.

B. FOR THE JURY TO KNOW ALL FACTS AND ACTS OF EACH

DEFENDANT:

- (1) All issues as stated above since this deals with fraud and tort actions.
- (2) WHAT STATEMENT IS FACTUALLY TRUE—based on the truth of the Corporation records and court proceedings in finding the missing money and court actions to get the “injunctions” against this Plaintiff to keep him from voting and advising the membership and the courts as the Chairman of the Long Range Planning Committee about “special use permits” as “What Beck said to Judge Palomino that this member/former member Defendant/respondent/now Plaintiff pro se wrote to church members as doing his duty as a member or contested non member with civic and membership rights as a Committee member and leader for the Corporation to freely speak and continue the investigation against Beck and other corporate “schism” officers and said about Beck and the others was a fraud as Beck alleged or what the evidence shows as to:
 - (a) Was the actions by Beck a fraud to Judge Palomino(it is now per the rulings 2003-2004, of Judge Arnold for the Gills III, family lawsuit and per the rulings of Judge Barton on March 28, 2006) to distract the attention away from his criminal acts with the company records as this Defendant/respondent/now plaintiff pro se states Beck charges were fraud
 - (b) Was the actions by Beck a fraud to Judge Palomino to distract the attention away from his criminal act of stealing the microphone from

the Awana children and this Awana Commander Defendant reporting this criminal act a motivation for Beck to fraud the members and then slander this Defendant now Plaintiff

- (c) Was the actions by Beck a fraud to Judge Palomino to distract the attention away from his and school pastor Herman Meister's criminal act of making false reports about the building project to the professionals to thus then gain false reports to then provide to the corporation members to gain their support to extract more money out of them and also use this false information to try to prove the knowledge and facts stated by this Long Range Planning Chairman turned defendant/respondant/now plaintiff pro se
- (d) Was the actions by Beck using his Corporation Trustee also a Sheriff Deputy in the court of Judge Palomino a fraud.
- (e) Was the actions by Beck using the employee the now former wife to spread his extortion and frauds
- (f) Was the conspiracy by Scruggs to conceal his later actions in these 2001-2006 current issues to help conceal the fraud by Beck since in these EXPARTE actions and in court testimony by Scruggs necessary to force this Plaintiff to sell his home in a forced sell loosing thousands of dollars because this Plaintiff's home at 18005 Linda Woods Street was located less than ¼ mile from the 18105 Gunn Highway property, so this Plaintiff was the closest of all church members to the new property and knew the community issues but by

the conspiracy of Scruggs and these injunctions this Plaintiff could not testify both as a Church Member or non member or as a resident property owner about the frauds of Beck and his Schism to use the 18105 New Property.

2. Plaintiff and Defendant nor Defendants attorney have never settled or agreed on any points above herein and these points raise many other points as discovery from the Corporation Business Records and Corporation Business Quarterly and Special Called meetings notes are reviewed by this Plaintiff as the only expert with the full knowledge of the attempted goals of the general congregation from 1993, to now can reason through the frauds to divert money and goals by Beck and his “schism” from the General Congregation and this Plaintiff and his family and the Communities of Hillsborough County of rights these attorneys continue to block by trickery in these courts.

3. This response in opposition is further based on the following objections:

A. Defendant has yet to prove the “threshold” doctrine of MALICKI that his Clients have religious protections to call their actions “worship” but as pointed out in numerous case laws shown to this court that property, missing money, slander, libel, extortion, criminal child abuse and a host of other crimes do not come under the First Amendment alleged freedoms but as even in MALICKI it states must be civilly protected by society.

B. Most of the decisions from MALICKI using DCA cases were overturned by this FLORIDA SUPREME COURT understanding the basic laws of a church with no heretical appeals process against those in a “schism” who misuse a church to do corrupt criminal acts

- C.** These Courts then are the only venue to control criminal violations of the Florida Statutes and the Constitution which says “no law shall impede the obligation of a contract” so these Courts must then enforce the Fourteenth Amendment right to enact and participate in a contract and then punish those who violate the contract and laws that are done illegal to the contract and illegal to civil laws as a contract with society to protect the Constitution, society and this Plaintiff and his children, which is a right to entrusted to a jury of peers to decide who violated the Constitution, Statues and the Church By-laws portion of civil obedience between those in the contract. This protects each persons right per ARTICLE II of the BY-LAWS, to still “worship” as per the true definition of religion as taught at FBCCP in that “worship” as Beck taught is showing GOD HIS “WORTH SHIP” from you or me by our words or actions to HIM as GOD. What one does to act civilly towards others is a proof of what one actually truly does to show honor to his “own” sorted worship of himself or “WORTH SHIP” and thus in not the true practice of his religious beliefs that were sought to be protected by these writers of the Constitution.
- D.** No production from Charles Denny from his clients has been proved true and each point when this Plaintiff presents the true evidence shows that Beck and his “schism” have advanced another fraud through the attorneys to these multiple courts of Judge Palomino, Judge Timmerman, Judge Gomez, Judge Arnold, Judge Sierra, the Second District Court of Appeals, Judge Stoddard, Judge Barton, and this Honorable Court.
- E.** Defendants have never disproved these claims in affidavits or evidence or court cases provided to support Plaintiff’s position as clearly stated by the now former wife in the kitchen of my former home at 18005 Linda woods Street, in October 1999, at the time

the decision was made for the protection of this plaintiff and believed to be in the best interest of the marital children J.D.T and J.G.T to get the mother who was violent and had become a threat to this father and his children by and her “Schism” conspirators in and from the safety of the home to a different church and school, when she yelled at this Plaintiff, “how can you be so right and these six men be so wrong?”

F. Now defendants and her schism “partners” including attorneys have started recanting their frauds and more discovery will disprove all their false allegations and frauds and omissions of truthful disclosure.

WHEREFORE, EVEN IN THE RESPECT FOR DILIGENCE AND JUSTICE THESE POINTS RAISED IN PLAINTIFF MULTIPLE EXHIBITS, AFFIDAVITS, COURT TESTIMONY, COMPLAINTS FILED IN MULTIPLE COURTS AND HEREIN ONLY BEGIN TO UNRAVEL THE “FACTS” THAT SUPPORT THE DENIAL OF THE REQUEST BY DEFENDANTS FOR SUMMARY JUDGEMENT AND THERE ARE AFTER DISCOVERY TRULY STARTS EVEN MORE FRAUDS OF CAUSES AS RAISED BY ATTORNEY DENNY THAT FLOW FROM HIS CLIENTS FLAGRANT MISUSE OF THESE COURT AND SLANDER PROOFS OF FRAUDS TO THE CORPORATION BY STATEMENTS MADE IN THE IN SAINT PETERSBURG TIMES AND TAMPA TRIBUNE NEWSPAPER ARTICLES THAT SHOW BECK IS RECANTING HIS PLAN BUT IS ENFORCING THE BUILDING PLAN READY IN 1999, TO BE EXPOSED BY THIS PLAINTIFF AND THE CONGREGATION WOULD NOT HAVE VOTED FOR THE PLAN OF BECK AND THE SCHISM IF THEY KNEW THE WARNINGS OF THIS LONG RANGE PLANNING COMMITTEE CHAIRMAN AND NOMINATION COMMITTEE MEMBER OF ALL

THE FRAUDS BECK AND THE SCHISM WERE ADVANCING AS THIS CORPORATION NOW SITS WITH SPENDING OVER \$4,000,000.00 IN A PROJECT THEY CANNOT USE TO MEET ALL THE NEEDS WE SAID MUST HAPPEN IN 1999, BEFORE CONSTRUCTION SHOULD BEGIN AND THE PLAN THE “SCHISM” OF BECK, MEISTER, BROWN, LEATHERMAN, HOWLETT AND JEFFERS HAVE NOW FAILED UPON AND THAT WILL NEED TO BE EXPOSED IN THIS COURT FOR THE TRUE ADVANCEMENT OF PROTECTION OF THE INTEGRITY OF THE COURTS AND THE PROTECTION OF THE NON “SCHISM” INTEGRITY OF THE MEMBERS OF THE FBCCP CORPORATION AND OF THIS PLAINTIFF AND PLAINTIFF’S FAMILY AND THIS COMMUNITY.

WHEREFORE PLAINTIFF MOVES:

1. That the motion of Defendants for summary judgement be denied.
2. That all discovery be granted as requested by this Plaintiff since 1997.
3. That a continuance be granted to enable this Plaintiff to obtain essential evidence.
4. For sanctions and other penalties be charged against these Defendants and their representation for discovery violations and attempts to deceive this court.
5. **For this court to take judicial notice of all cases mentioned in this case.**
6. **For this court to assist this Plaintiff to have all injunctions that flowed from this defendant be forever overturned and stopped so Plaintiff can finally after over 10 years of abuse by these defendants be a free man to be a father to his children without fear that these defendants will create other frauds and charges of a criminal nature against this father and**

active civil and civic leader as an extortion for covering Defendants
actions as a “schism” vindicated from every crime alleged by the
“schism”.

7. For such other relief as this court deems proper.

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

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

By: _____
Randall C. Townsend

BEFORE ME, THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED RANDALL C. TOWNSEND, PRESENTING IDENTIFICATION, WHO UPON BEING DULY SWORN STATED THE FORGOING IN THE ABOVE DOCUMENT IS TRUE AND IS HIS OWN WORDS.

WITNESS MY HAND AND OFFICIAL SEAL THIS _____ day of _____, in _____.
BY ID PRODUCED _____.

NOTARY PUBLIC: _____

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 and to the Honorable Marva Crenshaw.

Randall C. Townsend