

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

**RANDALL TOWNSEND, individually,  
And RANDALL TOWNSEND, as  
F.S.617 REPRESENTATIVE for the  
FIRST BAPTIST CHURCH OF  
CITRUS PARK/CITRUS PARK  
CHRISTIAN SCHOOL  
Plaintiffs,**

**Case No.2015-CA-001928**

**vs.**

**JOHN GRANT, individually, JOHN GRANT,  
As Registered Agent of First Baptist Church  
Of Citrus Park/Citrus Park Christian School,  
JOHN GRANT, P.A., et. Al.,  
Defendants**

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**PLAINTIFF’S OPPOSITION REPLY TO MOTION TO DISMISS OF  
CHARLES CANADY, BARBARA PARIENTE and PEGGY QUINCE,  
Individuals, “Masked” as  
ALLEGED FLORIDA SUPREME COURT JUSTICES**

**COMES NOW, PLAINTIFF’S RANDALL TOWNSEND, PRO SE FOR ALL  
PLAINTIFFS AND UPON OUR OPINION AND BELIEFS STATES:**

**1. This another Motion to Dismiss is based on worthless attempts at  
A Defense(s) and is again another Malicious Prosecution basic attempt to:  
delay; victimize; ruin Plaintiffs; ruin plaintiffs reputation; use improper  
purpose; harass the Plaintiffs; and knowingly placing blame on someone  
other than the actual wrongdoer and suppress evidence that exonerates  
now all Plaintiffs from an ongoing Malicious Enterprise that began in 1987,  
when In private practice but still -, 1987-current times an alleged  
“honorable” member of the Florida Bar, attorney Patricia McCarthy and**

now an Assistant State Attorney, did what the Florida Bar and the Florida Supreme Court in case SC09-1121, for disbarment, bound to Plaintiffs Attorney Heather Gray as Plaintiff's Reported and confirmed by the 2DCA since 3/2004, her Malfeasance, Negligence And then TORTS, to her client(s) and failed to do subpoena's for Townsend for discovery of the Joint Venture Contract Business Papers that now all Defendants and others unknown still continue to try to "impede" as this will continue to expose the use of Townsend's and those for whom he was 100% elected to speak, use of our proceeds against us by these alleged "honorable" serving Fiduciary bound contract persons since 1987.

2. Plaintiff's have proved beyond any shadow of doubt the 6 elements of their Conspiracy to do the Malicious Enterprise and the Malicious Prosecution to take money and Defame Townsend' points of facts and laws even by these admissions of guilt by these defendants, their Superior Courts and others yet these Defendants and their agents and others unknown continue to "delay", "initiate more acts, prosecute or pursue the original case for improper purposes" knowing:

A. Their co-participants are in political and judicial positions to try to continue the Malicious Enterprise for money, elections and child abduction for their own Quid Pro Quo advancement;

B. Patricia McCarthy with Lane ET AL since 1987, did not have probable cause to delay production of records or even file their counter-claim to conceal their proved drug gang, bribery, extortion and RICO Gang

**activities to pay bribes for themselves and politicians. Then by torts to limit Townsend to stop all his business and assist 100% Lane in violation of the HOBBS Act, 18 U.S.C. 1951 so only those that continue the Malicious Enterprise can get the proceeds or Quid Pro Quo rewards; and**

**C. Since 10/1994, with the Confession from the Pulpit in a Regular Quarterly Business Meeting, Administrative Pastor Elbert Nasworthy and new Senior Pastor Ron Beck and the Finance Committee Members and Trustees admitted to Breach of Contract Acts of the Bylaws, redistributing of Designated Funds and self-dealing and evasion of Tax liability and putting the F.S. 617 Corporation Not For Profit and the Religious Society Members in a possible illegal status by a “Sect” and that the fact that the Members in such a status were damages in a “False Public Light” which still remains to this day because illegal Sheriff Deputies Howlett and Jeffers and Smoak and Corbin and Registered Agent/ FBCCP Lawyer Republican Party Leader John Grant and David Gibbs, Lawyer to the Jeb Bush Republicans (now even in the sale of the property to the K-12 Organization) and their Superior alleged “Law Enforcers” continue to block discovery of said alleged “proper” Business Records and these Members “Designated Proceeds” and the Members “Free Will” to operate per our BYLAWS has been controlled by Fraud(s) of “Masked Deputies” ET AL, Under Color of Law and Under Color of Uniform even admitted as causing Defamation to the FBCCP by the email of Defendant John Grant 6/2008, states: “...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..." alleging Townsend as the speaker for the Non Sect Members was or is "ruining another's reputation or to knowingly place blame on someone other than the actual wrongdoer" when production of records reveals "Hate Crimes" and thousands of dollars diverted for unintended purposes to these Defendants and "Others unknown" by the "Sect" to unknowns.

3. Especially note the Defamation step(s) totally in "Odious and Outrageous" "Hate Crimes" as contrast to the Bylaws and Religious Society REQUIRED Practices by the "Sect" concealed by their "Sect Agents" of September 8, 1999, to conceal the "Sects" false business records and the fraudulent Building Scheme many members already knew and were looking for more records for more proofs before making such as a Criminal Charge, the illegal removal of Townsend from his Authorized Offices as these Members had elected him since 1993-1994, to prevent their demise and defamation by this Sects and the "Sect Agents" knowingly, willfully, intentionally and recklessly illegal choices. And the Act of causing the breakup of a marriage and the illegal abduction of children 10/1999 and the intentional actions by Defendants and Others Unknown without probable cause to keep separate a family regardless of Judge Palomino warnings, and the 2003 Judge Timmerman Order of visitation. Additionally, continuing still to current times allow Defendants to intentionally through HCSO Master Detective John McDarby to still through

2014 to threaten Townsend, “Don’t go to your Church. Don’t try to see your kids. Don’t file more lawsuits.” Also telling more lies as to his alleged contact with J.D.T. and J.G.T and that “they did not want contact with their father” but then October 1, 2014 admitting he never spoke to the kids. Even while a lawsuit against him and his co-defendants is active and pending for their Torts in the Malicious Enterprise.

4. Plaintiffs allege and believe that the refusal of Bruce Chapin and Linda Chapin to answer this Complaint is intentional Default and is admission of the Malicious Enterprise as Townsend reports and admission of the Chiles Democrats and their Agents Roles in the Malicious Prosecution as Plaintiffs exposes them with the “others” and the yet unknown(s).

5. Even though Patricia McCarthy, as private lawyer allegedly per Attorney Popper properly ended her contract for services with Townsend, and those for whom he speaks, in an allegedly approved manner determined by the proved self-serving of the Florida Supreme Court and their Agents and the Governor(s) in 1987 and since and their agents as Florida Bar and their agents, McCarthy’s new role in the State Attorney’s office created a new contract for Fiduciary Services with Townsend ET AL and all citizens that has been violated by her Breach of Oath, omissions of truthful disclosure and torts with her co-participants to suppress evidence that proves the “Hate Crimes” resulting from the continued Malicious Enterprise and the illegal withholding of Townsend’s Contract related

**Business Papers and FBCCP/CPCS papers that show the illegal and false reports for uses of Plaintiff's proceeds, property and then the even illegal abduction of J.G.T. and J.D.T. since 1999, as their Malicious Enterprise is still being done by Governors, Florida Supreme Court as Agents of the Governors, John Grant Republican Party leader, HCSO John McDarby, now FSCt. Charles Canady, Pam Bondi, Rick Scott, John Berry, John Harkness, Mark Ober and still acting without authorization from FBCCP Officer Townsend as the Nominations Committee Investigator since 1993, affirming that Joe Howlett and Tim Jeffers while members as individuals and are in Breach of Contract as the FBCCP Bylaws and as others as "Karen Jeffers" are not officers of the Corporation Not For Profit but are "masked" Under Color of Law and Under Color of Office, "imposters" "sect Agents" in their alleged roles as "Honorable "Law Enforcers", but are concealing discoverable evidence of frauds and doing Torts defined as "Hate Crimes", "impeding" the "Free Will", each defendant named and others yet unknown and their agents are trying to claim immunity in their illegally gained positions restricting Plaintiffs "FREE WILL" using our own proceeds against us. Emphasis Added.**

**6. The fact that: these 3 "alias" justices; Attorney General Pam Bondi, now as her superior officer; The Florida Bar and their agents; The Governor and the Legislature; even allow ASA Cridlin's Motion as Fraud(s) attempted on the Court and Plaintiffs and Citizens of Florida shows their intent to continue the Malicious Enterprise to abuse and defame Plaintiffs**

by their “Bad Faith or malicious purpose or in a manner exhibiting wanton an willful disregard of human rights, safety, or property...” to the Constitution and Citizens of Florida attempting to still conceal evidence that exonerates, Townsend and these Plaintiffs for whom he was elected to represent as a F.S.617, Religious Society, as ASA Patricia McCarthy as the first lawyer in private practice did Malfeasance, Negligence and then Torts to her own clients in collusions with Charles Williams Jr. and Others since 11/1987, and with her ASA Agents and these defendant and their new “agents” known and unknown attempt to conceal and ignore their own documented and admitted “Hate Crimes” clearly detailed in this 15-CA-1928 Complaint and the underlying complaints as filed and included as “...VIOLATED KEEPING TO THEIR FIDUCIARY DUTIES TO ALLOW PLAINTIFF TO REVEAL HIS KNOWLEDGE OF THE SECRET FUNDS AND OTHER FLORIDA STATUTE VIOLATIONS...SO TO CONTINUE THE EXTORTION, EMOTIONAL DISTRESS, FRAUDS, ILLEGALLY UNJUST ENRICHMENT FOR THEMSELVES AND OTHERS...” as a Whistleblower since 1987 when Townsend first reported drug and RICO crimes to Attorney Patricia McCarthy who became an Assistant State Attorney while violating her clients rights as she aided and abetted the Malicious Enterprise to avoid reporting her own violations of her clients and the law and her Oath as an Officer of the Court.

7. Again Ms. Cridlin, as Assistant State Attorney and others are

**criminally breaking more laws and continuing the Malicious Enterprise by Torts and “Hate Crimes” and illegally using Plaintiffs proceeds by frauds attacking the victims instead of prosecuting the proved criminals to continue the continued abduction and tort interference with Child Custody since 1999 and violating her own F.S.876.05, Oath to her Official Fiduciary Duty to uphold the Constitution [another Breach of Contract by this defense of defendants and defendants in Breach of Contract have no defense] by in this Motion to Dismiss, trying to represent Individuals and their admitted illegal acts done before or even now without the protection of their alleged “immune” Official Capacity and as the Torts they confessed they did assisted themselves to obtain Plaintiffs proceeds since 1987 by criminal acts defined as “Hate Crimes” of themselves and their co-participants and their alleged immune Official Capacity as already admitted by Charles Canady, Marva Crenshaw and Charles Denny IV and others:**

**A. Is again attempting a Fraud on the Court which is to serve the Constitutions and Contracts and on the Constitution and Citizens she is to protect from SLAPP harm and F.S.768.28 “wanton disregard...” torts;**

**B. is in violation of continuing “Hate Crimes” as admitted by “judge” Canady in 2012, and thus his recusing the entire Florida Supreme Court and the 2DCA, not then for future prejudice but for past torts these individuals now aid and abet as now still ongoing and now over many years he himself admitted he has participated in as an “individual” with no immunity but concealed in the Malicious Enterprise by the Florida Bar and**

**the FDLE, then Democrat and then switching to the Republican Party with Jeb Bush as counsel (With David Gibbs, Ken Connor, John Grant), [Even David Gibbs since 1991 and Ken Connor in 1990's partly and allegedly with "honest services" assisting Townsend with the legal arguments in his Legal Briefs.] even prior to being appointed to the 2 DCA, by Governor Jeb Bush as was "judge" Crenshaw appointed by Jeb Bush {and then Charlie Crist to the 2DCA}, after being his "alias" honorable legal counsel with no immunity for their torts and "attorney" Denny IV in 2006 admitted to their own torts, frauds and delay actions as "Hate Crimes" and now multiple other laws being violated and continued in the Malicious Enterprise to defame Townsend and his knowledge of "Hate Crimes"; and**

**C. in violation of our Contracts as the Florida Constitution illegally using her Official Capacity as a State Officer Of the Attorney's General Office, assisting in the continuation of admitted in 2006 and proved criminal acts even by "judge Crenshaw" and "attorney" Denny IV" "Hate Crime" acts of a "Sect" even naming Beck and law enforcement officers and "Sect Agent's" and after reading the case file in 02-03812 and the related cases back to 1988, saying Townsend could go after others later and as being done herein exposing these co-participants who are still violating a Federal and State Protected Contract and Civil Right as Religious Society Contract as the FBCCP By-Laws and the Florida Constitution:**

**Article I Section(s) 1. “All Political Power is inherent in the people.” SLAPP Tort “Bad Faith...wanton disregard...” violations that have no “Immunity” and do “impair” or “impeded” Contracts of Basic Rights Determined by the People; 2. “Inalienable rights...” ; 3. “Religious Freedom” “No revenue of the state or any political subdivision or agency thereof shall ever be taken from the public treasury directly or indirectly in aid of any church, sect, or religious denomination or in aid of any sectarian institution.” ; 4. Freedom of speech and press. “In all criminal prosecutions and civil actions for defamation the truth may be given in evidence. If the matter charged as defamatory is true and was published with good motives, the party shall be acquitted or exonerated.”; 5. “Right to Assemble”; Especially a dad with his children in a church and Christian school by a dad as the Supreme Court Administrator/Representative of the Bylaws and Laws exposing Torts of non-member deputies as illegal agents of these defendants.; 9. Due Process. “Deprived of life, liberty or property without due process of law.” 10. Prohibited Laws. “No...law impairing the obligation of contracts shall be passed.” This includes our United States and Florida Constitutions and the FBCCP Bylaws as Contracts.; 11. Defendants Frauds imprisoned us and now it is time for the Truth to set us free and imprison them even for their own admitted frauds.; 12. Searches and seizures. “Alleged” “law” enforcers have illegally seized the proceeds and rights of Plaintiffs since 1987, or before.; 13. Habeas corpus. Illegal “State Officers” by Torts do Detainment Of our Rights, Religious Society Practices and Review and Use**

of our Business Records and Proceeds and Interference with Child Custody.” Even through 2014 using illegal actions of “law Enforcers” and now again even illegal alleged “Under Color of Law” defenses by State Officers giving Plaintiffs never a way of retention of our Rights. 14. Pretrial release and detention. Without a legal “Due Process” defendants have “implanted” and “impeded” and “detained” Plaintiff Townsend since 1987 by his Attorney Patricia McCarthy and Plaintiffs FBCCP Corporation Not for Profit and our rightful owners not of the “Sect” of our rights and property.; 15(a), Prosecution for crime, “...Information under oath filed by the prosecuting officer of the court...” and no officer or court legally gained the right to abduct J.D.T. or J.G.T. or FBCCP Proceeds as has been done by these “alias law enforcers”; 16 “Rights of Accused and of Victims” fully violated since Patricia McCarthy failed to get records which proved Townsend was not committing the frauds as is proved herself and Lane ET AL did and are still doing the crimes of the Malicious Enterprise; 17. Excessive punishments. Plaintiffs have been “detained” and victimized by frauds since 1987 as Townsend(s) and 1994 as other Plaintiffs; 18 & 19. Plaintiffs have had to pay legal fees to protect or try to restore our Rights and recovery even our kids from illegal “Under Color of Law” persons acts; 21, Access to Courts, Denied by the Malicious Enterprise since 1987 and the FBCCP since 1994; 22, Trial By Jury, Denied by the Malicious Enterprise since 1987; 23, Right to Privacy, Denied by the Malicious Enterprise since 1987 and at the FBCCP since 1994; and

**Article II Section 3. Branches of Government violated multiple times as Legislators act as Lawyers to erode citizens rights and empower themselves or the other branches to limit Citizens Constitutional Rights to Redress aggression by the Government as shown in the 27 years of this case; 5; Pubic Officers, Oath as violated by the Florida Supreme Court not taking their Oaths and by even Ms. Cridlin and others continuing the Malicious Enterprise in violation of her Oath to the Contracts of the Constitutions Duties; 8. Ethics in Government, in this case has not existed since 1987 as stated in these legal briefs since 1988; 17. Impeachment. The Malicious Enterprise involved the Political Leadership that had a Fiduciary Duty to not aid and abet the Malicious Enterprise Plaintiff's Report; 18, Conflict of Interest. Violations by all Defendants since 1987;**

**ARTICLE V. Section 2.(a). "...and a requirement that no cause shall be dismissed because an improper remedy has been sought..." By Chief Judge Canady's recusal of himself and the entire Court admissions of past violations showed admission of aiding and abetting the Malicious Enterprise of "Hate Crimes" and other criminal acts; 3. Supreme Court. Should have 7 justices but they had not taken their Oaths and thus no representation from each Appellate Court as required and these "alias justices" acted without Oath Protection and guilty of their crimes going back to the early 1990's and as the ROBINSON case ruled the 5<sup>th</sup> DCA and the Florida Supreme Court rulings in the related TOWNSEND v. Lane, Townsend v. Popper; Townsend v. Williams; Townsend v. Chapin cases**

proved their use of P.C.A's concealing the Malicious Enterprise these with the judges did is proved. 12. (f) "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." Thus the Supreme Court knowing defendants were involved in the Malicious Enterprise failed their Fiduciary Duties and without their Oaths protection aided and abetted criminal "Hate Crimes" in their helping the Malicious Prosecution showing their motives, frauds and intent.; 17. State Attorney is to prosecute not defend criminal actions. 18. Public Defender is to defend criminals only not able to represent themselves. Not these defendants herein. 19. "All judicial officers in this state shall be Conservators of the Peace." But in this case as HCSO Deputy Howlett, Beck and Grant ET AL served and charged Townsend with Disturbing the Peace, the truthful evidence shows defendants and others unknown are the violators of the peace as truly applied by our Constitutional Rights.

D. is in violation of DUE PROCESS as was what the 5<sup>th</sup> DCA said in Robinson was the violation by Patricia McCarty and all since to not get subpoena's immediately in 11/1987 for any and all documents Lane Et Al claimed protected their rights to do criminal acts and illegally keep Townsend's proceeds and "STOP" his ability to do business and rightfully take from the Joint Venture what was his as the evidence later partly produced the Customers (except Lane SR and Crenshaw and select others) only wanted "Honest Services" from Townsend without Lane. Each officer

of the Court and “alias law enforcer” and now through ASA Cridlin is violating Due Process as Lane ET AL has never produced all documents and what was produced showed illegal acts and Malfeasance of Court Officers. Advising Townsend he could not do business until these records were produced for over 4 years and then when produced attorneys using illegal Malicious Enterprise collusion with alias honorable Judge Powell to conceal the Malicious Enterprise continued the violation and Defamation of Townsend and of his truthful evidence exposing the criminal acts and illegal kickbacks and of the “defamation” did by Lane ET AL as still ongoing by the Grant Emails and FB Post of 3/2014 and even by these fraudulent claims in these Motions to Dismiss not based on our Laws.

E. Additionally by deputies Howlett and Jeffers and Smoak and FBCCP Registered Agent John Grant as the FBCCP Lawyer and their superior “alias” law enforcers “impeding” Townsend’s mandated investigation since 10/1994 of the admitted violations of the Bylaws by the “alias” “clergy” and the Finance Committee of the misappropriation of the designated funds in order to unlawfully obtain proceeds for themselves at the detriment of the Plaintiffs again these violations of Plaintiffs continues as they “impede” the rights of the Congregational Members and with current events as the sale of the 18005 Gunn Highway property now owned by K12 Educational Organization with ties to Jeb Bush as the #2 point of Townsend on September 8, 1999, “Stop the Building Scheme Frauds” still continues by defendants now putting FBCCP starting over and wasting

**years of our “Mission Growth Plan” since 1997 as Townsend as the Chairman of the Long Range Planning Committee was per the vote and promises of the members elected to do since 1994 but for the frauds now proved by the “Sect” and the “Sect Agents”;**

**8. With the ever changing complications of this case as that Defendants are still in unlawful positions and able to continue to use their unlawful Malicious Enterprise in these alleged positions of “immune” powers, Plaintiffs suffer their delays by not having the Discovery of Documents that a Due Process Case of a victim or respondent to a counter-claim since 1988 or defendant(s) based on these co-participants criminal claims alleged at Plaintiffs and therefore until production of all records Plaintiffs embrace Florida Constitution Article V. Section 2. States: “and a requirement that no cause shall be dismissed because an improper remedy has been sought.”**

**9. Further, Article V. Section 3. “Five Justices shall constitute a quorum” and therefore since Canady should have recused himself as he did and other justices had not taken their Oaths of Office since the 1990’s then the quorum of the Court was not met and these justices who had not taken their oaths are guilty of “Hate Crimes” on a Religious Society and even the continued abduction and “interference with child custody on J.D.T. and J.G.T as HCSO Deputy McDarby continues the fraudulent interference still in 2014 and to current times with no immunity.**

**10. Justices or any other State Officer, Not taking their oaths per AGO**

**96-41 Report of Attorney General Bob Butterworth of June 6, 1996 that all State Officials take their Loyalty Oath to affirm they will support the Florida and United States Constitutions per F.S.876.05.**

**11. By Failure to act to disbar these other participating attorneys and judges and others of the “alias” legal system as for the same charges that were proved against Heather Gray in 2009, there is no difference or doubt that these individuals are attempting to by illegal use of their alleged judicial immunity are concealing their own illegal roles in the Malicious Enterprise. Especially proving the facts is that when Townsend’s 2<sup>nd</sup> Grievance Complaint signed as receiving Certified Mail by Jane Cristy on 11/21/2005, is admitted as “I threw it in the trash.” And as the 2<sup>nd</sup> Grievance Complaint is sent to the Judicial Qualifications Commission and the certified mail is signed received by K. Musgrove on 11/20/2005, and a follow up letter of December 19, 2005, from Brooke S. Kennerly Executive Director states “The Commission lacks jurisdiction...”, after having the first Grievance Complaints as admitted in the 1990’s, by Mr. Root:**

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

**it is clear the Florida Supreme Court is willfully and knowingly and intentionally and recklessly continuing in participating in the Malicious Enterprise for their personal individual benefit to receive Plaintiffs proceeds and or Quid Pro Quo benefits by their co-participants.**

**12. Detailed in this Grievance Complaint of 2005 is the allegations**

against Heather Gray of which in 2009, the Florida Supreme Court finds her Guilty on the multiple counts as Townsend proved yet the court in Townsends appeals supported Heather Gray's role in the Malicious Enterprise thus proving their role in the Malicious Prosecution.

13. Civil Rights Act of 1964 and Section §1983 of Title 42, U.S.C. stating: "...which provides that any person who, under the apparent authority of state law, deprives another of any rights, privileges, or immunities secured by the United States Constitution and the laws will be liable to the party injured..." And Per Salinas v. U.S. 522 at 65, 118 S.Ct. at 477, 139 L. Ed. 2d at 362:

"A conspirator must intend to further an endeavor which, if completed, would satisfy all of the elements of a substantive criminal offense, but it suffices that he adopt the goal of furthering or facilitating the criminal endeavor. He may do so in any number of ways short of agreeing to undertake all of the acts/omissions necessary for the crime's completion."

14. To Defendants "Point 3. Plaintiffs Complaint is rambling and incomprehehsible..." ASA Cridlin and this courts records has already been informed of the findings of Judge Crenshaw and attorney Denny IV of multiple "Hate Crimes" and violations of law as already found as damages to Plaintiffs and other Citizens and Complaint Paragraph 11, stating:

"Plaintiff also had duty as described above and herein and was asked by others to investigate and to report other acts of Negligence and Frauds and Conspiracy to Defraud when Pastors and others with Finance Committee Members and trustees sought to defraud the Membership, Government Agencies and individuals,...including false reports to alias law enforcement officers...and for showing of intentional malicious defamations by defendants."

15. In a normal course of Defendants doing their Fiduciary Duty,

**Defendants as ASA Cridlin and those she is alleging to honorably represent as “alias law enforcement officers” are doing the actions to conceal and damage what Plaintiffs alleged since 1987, and have been “Hate Crimes” that Defendants in service to the citizens of Florida are to protect. Per F.S.838.21:**

**“A public servant who discloses or uses confidential criminal justice information with the intent to obstruct, impede, or prevent a criminal investigation or a criminal prosecution, when such information is not available to the general public and is gained by reason of the public servants official position, commits a third degree felony.” Also F.S. 112.313.**

**16. So since Townsend since 11/1987, has advised defendants of the illegal actions of Lane ET AL and these “alias” “law enforcers” have aided and abetted the first crimes and compounded other crimes still ongoing in 2015, multiple felonies are proved and thus as an officer of the court these same defendants are in Breach of Contract and thus cannot offer a Defense.**

**17. Even the Florida Supreme Court determined that F.S. 839.18 applied to a person who performed the duties of deputy sheriff before being qualified according to law. The Person had been appointed as a deputy, had taken the required oath, and had executed a bond, but board of county commissioners had not approved the bond. Therefore, the person was not yet qualified to perform the duties of deputy sheriff. Stinson v. State 80 So,506 (Fla. 1918). So “Newly elected or appointed public officers must not assume to perform any of the duties of public office before “qualification”**

according to law. Doing so would be a second degree misdemeanor.

**F.S.839.18.”**

**“Any governing authority or person who knowingly or carelessly permits an employee to continue in employment after failing to take the oath is guilty of a second degree misdemeanor. F.S.876.08”**

**Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communications in interstate commerce, any writings, signs, signals pictures or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years , or both. (18 U.S.C. 1343.)**

**“Scheme or artifice to defraud” was defined by Congress in 1988 as a “scheme or artifice to deprive another of the intangible right of honest services” (18 U.S.C.1346)”**

**18. So with the Florida Supreme Courts own Ruling of F.S.876.08**

**“Guilty” for one offense without the Bond, and the Florida Supreme Courts own admissions of not taking their Oaths for many years even during their rulings on Townsends multiple cases in the 1990’s-2007, as “individuals” these Florida Supreme Court “alias” “justices”[and Charlie T. Wells, Harry Lee Anstead, Raoul G. Cantero, Kenneth Bell,] acted without: Oath; Bond; Or Legal Protection; as Authority to rule which continues the Malicious Enterprise with their acts as co-participants of the Torts and “Hate Crimes” not just the misdemeanor of the ruling.**

**19. Further in Paragraph 27. Defendants ignore the claims Plaintiff’s**

**State:**

**“Who continue their abuse of this plaintiff even by the words said by their attorney in 12/2003 and the John Grant Facebook post of 3/2014, and multiple emails, and these Defendants know their entire accusations that they believe plaintiff was a dangerous person or potentially dangerous was a created fraud by ....and ‘Others.’”**

**These Defendants Motions to Dismiss and other alleged arguments continue to show the intent by Defendants to continue the Malicious Enterprise and Malicious Defamation by Defendants against victim honorable Whistleblowers as their Tax Paying Bosses denied their Jury Right, and redress for illegal Government Acts herein proved as SLAPP “Hate Crimes”.**

**20. Further in Paragraph 30, “Defendants were obligated to this Plaintiff to not slander his good name and harm his family by their actions as they assisted the senior pastor and his staff and Finance Committee and Trustees to violate the Rights of this Plaintiff by Frauds as themselves and others violate their contract obligations to abstain and prevent unlawful actions and defamation to plaintiff(s)...” while unlawfully obtaining our proceeds and requiring us to pay extra costs and fees to retain from Government Persons our own property and rights including fraudulent using the “Designated” Funds of a Religious Society by a “sect” and their “Sect Agents” as Defendants and as others yet unknown as sued herein.**

**21. Defendants argument in II. Legal Argument in Support of Dismissal**

**A. Plaintiff’s Claims are Barred by Judicial Immunity is irrelevant in this Defense as a Matter of Law because these acts are done prior to their taking their Oaths Of Office, Torts even admitted “Hate Crimes” and per multiple United Supreme Court Rulings even specific to this case in Townsend v. Lane through all cases now as Townsend ET AL v. Grant ET**

**AL, the superior courts stated the “alias” justices cannot grant themselves immunity and ASA Cridlin’s case law is irrelevant.**

**B. These “alias” justices “acted without jurisdiction” just as the case cited as *Johnson v. Harris*, 645 So.2d 96,98 (Fl. 5<sup>th</sup> DCA 1994) case affirms as they acted in the “clear absence of all jurisdiction” per *Stump v. Sparkman*.**

**22. Additionally, as proved multiple “alias” individuals on the Florida Supreme Court at various times during this litigation since 1987 have not taken their oaths of office and therefore had “no jurisdiction” to attempt and then do the Fraud on the Courts, Plaintiffs and Citizens as the 5<sup>th</sup> DCA Affirmed as Townsend’s Pleadings alleged their intrinsic, extrinsic and Frauds on the Court that defendants did in their Malicious Enterprise still ongoing.**

**23. The Connection to the defamation of John Grant and as a leader of the Republican Party during the timing of Charles Canady joining Jeb Bush as leader of the Republican Party, with Ken Connor and Ander Crenshaw and David Gibbs allowed defendants in collusion with other defendants and others unknown now through another of the “Government Veil” to continue the Malicious Enterprise and impede Townsend reporting their violations of the FBCCP Bylaws and Plaintiffs seeking recovery of our Rights and Proceeds. Canady even argued:**

**“A President who has committed perjury and obstruction of justice is hardly fit to oversee the enforcement of the laws of the United States.” Also saying, “His calculated and stubbornly persistent misconduct while**

**...serving as President of the United States has set a pernicious example of lawlessness, an example which by its very nature subverts respect for the law.”**

**Canady should know firsthand the facts Townsend proves as his father was for Governor Chiles a Senior Advisor and Canady a democrat also switched to be General Counsel for Jeb Bush who then appointed him to the 2DCA and then appointed to the FSCt by Charlie Crist.**

**If anyone knows the crimes Townsend alleges it is one on the inside as Canady who has admitted “Checkmate” and recusing himself and the FSCt in this case. Canady and his Co-Participants knows full well the connections of Ken Connor as legal partner with Mel Martinez [who Townsend also personally and directly advised of the Malicious Enterprise] who then from replacing Linda Chapin as the Orange County Commission Chairperson then becomes for President George W. Bush the director of HUD and then is able to flow Federal Monies back in to Florida to related departments connected to the Malicious Enterprise Townsend has exposed. Thus these “individual” persons in the Malicious Enterprise allegedly gained QUID PRO QUO alleged rights of “immunity” illegally they could not attain because they were in Breach of Contract(s), admittedly involved in a criminal enterprise of “Hate Crimes” and alleged granting to themselves rights or protections that the U.S. Supreme Court since 1989, ruled multiple times as being “illegal” violations of the U.S. Constitution and Civil Rights affirmed therein and as already the 11<sup>th</sup> Circuit Court of Appeals even EN BANC in multiple rulings wrote to address unlawful acts**

of these of “alias” Under Color of Law “law enforcement” as Townsend shows as the “Government Veil” still doing and continuing today still their “Hate Crimes” by the same “individuals” unlawfully assisting Ms. Cridlin’s fellow alias Government Co-Participants who continue to blatantly act outside the Scope of their Honorable employment(s).

24. These Defendants continue as the Malicious Enterprise “Gang” the same “Hate Crimes” since 1994, by the illegal Breach Of the Religious Society Contract and the illegal placement of Tim and Karen Jeffers and Joe Howlett in their places of alleged “Officers” positions without the Nomination of Townsend to the Membership and the Membership vote, so that these alleged “civilian” individuals as also “masked” government veil participants could defame the reputation of Townsend, obstruct his investigation of “FBCCP/CPCS Designated Funds” and daily donations and tuitions, and limit the monies owed to the FBCCP for the taking of property for the Eminent Domain litigation necessary for the widening of Gunn Highway for the Sickles High School Project and also then the payments sent to these “Sect Agents” not recorded in the Corporation Not FOR Profit Business Records as is to be presented to the Membership each Quarter and in the Yearly Business Meeting for authorization to act or spend the Memberships Funds as directed. By “Hate Crimes” these then of the “Sect” and “Sect Agents” to conceal their crimes in collusion did illegally ban Townsend from his FBCCP “Officers” even as a State Of Florida Officer, Duties and then did and still abduct him from his Children since

1999, so to continue this same Malicious Enterprise as begun by the original Tortfeasors, Lane ET AL and Patricia McCarthy ET AL.

25. All alleged Defenses by Ms. Cridlin and her Co-participants are further proofs of acts of Breach of Contracts, crimes and not a Defense at Law.

26. Quoting Chapter 67 of Florida Jury Instructions by Richard B. Badgley, at 67.01[3]—Comment,

“The Florida Supreme Court has adopted the position set forth in the Restatement (Second) of Torts §46, which acknowledges the existence of an independent tort for intentional infliction of emotional distress.<sup>1</sup> At the same time, recovery of damages for emotional distress in a cause of action for another tort remains viable.<sup>2</sup> Damages may be recovered for emotional distress without a showing a bodily harm resulting from the emotional distress.<sup>3</sup> Examples of this include ...certain abusive debt collection practices.<sup>5</sup> Conduct that is actionable as intentional infliction of emotional distress may also give rise to liability for malicious infliction of emotional distress, for which punitive damages may be sought.<sup>6</sup> 67.02[3] “Abuse of real or apparent authority over a plaintiff may also rise to the level of extreme and outrageous conduct.<sup>5</sup> Examples of Florida cases in this category include...and abuse of position by a police officer.<sup>7</sup>” Per CITY OF DELAND v. FLORIDA TRANSPORTATION AND LEASING CORP 293 So2d 800 (Fla. 1st DCA 1974)

27. Plaintiff request an Honorable Court also take judicial notice of all papers filed in this case and in these related cases files since 1988, and incorporate them herein.

WHEREFORE, Plaintiffs request an Honorable Court to find:

1. Find Charles Canady, Barbara Pariente, and Peggy Quince, as individual(s), in Default and issue a 1. form 1.917 as an individual for acts he/she did before becoming “alleged justices” illegally receiving proceeds

and Quid PRO Quo benefits and thus becoming “justices” or per R.O.C.P.

1.500(e), issue a Final Default;

2. Find all named defendants in the FRAP 26.1 in Default and Fraud on the Court and Contempt of Court as all have been informed and some have fled the county and State of Florida and some or all did threats to Plaintiff while litigation is pending since 1988.

3. Find Counsel(s) Ms. Cridlin and others in attempting Fraud on the Court and on Plaintiffs in Contempt of Court as attempting to aid and abet ongoing criminal acts still being done by these defendants with others known and unknown.

4. Deny any and all Defendants Motions as by Breach of Contracts and Torts or their own prior admissions or omissions they are estopped from any pleading of defenses.

5. Order full discovery for all Plaintiffs causes to prove for trials to expose the Malicious Enterprise and damages;

6. Grant any and all Orders, restitution and full relief for Plaintiffs.

7. Rule this alias “answer” is nonresponsive and rule this Defendant is in Default as a matter of law;

8. Additionally, Plaintiffs request this Honorable Court issue an order requiring Defendant(s) to be found in Contempt of Court, Pay any and all reasonable costs and fees incurred by Plaintiffs and issue arrest warrants for their multiple criminal actions.

Respectfully Submitted by:

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was provided this day of September 4, 2015, by hand or email or e-filing to the Clerk of the 13th Circuit 800 East Twiggs St. Tampa, Florida 33602 and by emails as follows TVG Electronic FILING CASE NO: 292015CA001928A001HC, Shelley.cridlin@myfloridalegal.com; Christina.santacroce@myfloridalegal.com; Celia.wright@myfloridalegal.com; khornbee@hcsotampa.fl.us; olindema@hcsotampa.fl.us; FLservice@gtlaw.com; trammellc@gtlaw.com; moodym@gtlaw.com; richardb@gtlaw.com; lgustofik@pcsonet.com; dconnolly@pcsonet.com; araymond@dglawyers.com; cdenny@dglawyers.com; corourke@dglawyers.com; scruggspa@aol.com; [kkharrod@gmail.com](mailto:kkharrod@gmail.com); [kjeffers@citruspark.org](mailto:kjeffers@citruspark.org) for Tim and Karen Jeffers 15217 W. County Line Road Odessa, Florida 33556.

**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 4<sup>th</sup> DAY OF September, 2015,

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

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

Respectfully submitted,

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