

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

PLAINTIFF'S OPPOSITION AND REPLY TO DEFENDANT'S
TIMOTHY AND KAREN JEFFERS
LATE SECOND July 24, 2015, MOTION TO DISMISS

COMES NOW, RANDALL TOWNSEND, PRO SE, FOR ALL

PLAINTIFFS and states:

1. These defendant's already filed a one small paragraph "alleged" answer, dated July 7, 2015, filled with false claims matching their coaches slanderous claims of John Grant still in 2015, since 1994.
2. It appears Defendant Tim Jeffers and Karen Jeffers are illegally being coached and or provided representation by the Attorney's Generals office by Assistant Attorney General Shelley Cridlin as this second "answer" appears to the form of Assistant Attorney General Cridlins Answer for the Florida Department of Law Enforcement "FDLE" as the Jeffers was copied on the FDLE Answer from Cridlin.

3. **Defendant Jeffers is now a former Pinellas County Sheriff Deputy(retired) but served since 1994, illegally “imbedded to impede” as a “masked” “Under Color of Law” “alias” “enforcement Officer” in violation of the FBCCP BYLAWS to obstruct the “FBCCP Owners” as per our Congressional Members Rights.**
4. **Defendant Jeffers also acts “masked” “Under Color of Law” as implanted Trustee and or other officer of the FBCCP/CPCS and his wife, Karen Jeffers acts illegally “implanted” Under Color of Law as CPCS School Principal as in these unelected positions Defendants bypassed and ignored the BYLAWS process to obtain the required recommendation of the FBCCP Nominations Committee of which Townsend since 1993 through 1999 was required to recommend to the membership for a vote when in violation of the BYLAWS and SINCE never gave recommendation of either Jeffers for these positions in a required Motion to the FBCCP General Membership for their vote.**
5. **Again herein by this late filed Motion from Jeffers they are:**
 - A. **Since admitted in violation of the Bylaws 10/1994, illegally using FBCCP Designated Proceeds not approved by the proper Rule of Law of the Members per the BYLAWS per all financial matters and their uses to be publicly announced and regulated by the Members in business meetings;**

- B. illegally acting “impeding” Townsend from our Religious Society Practices as a Member per his 100% Elected Duty to do the Officer Duties to which the membership, elected him to as the Nominations Committee Member required to report to the FBCCP Congregational Members Per the BYLAWS In the Complaint as EXHIBIT 1., ARTICLE III Section 7, illegal uses of monies as admitted since 10/1994. But due to the illegal actions of interference by HCSO Deputies, SGT JOE Howlett, Detective Smoak and all HCSO Sheriffs and Deputies still through 2015 and Pinellas Deputy Jeffers outside of his Counties Jurisdiction in collusion with Attorney John Grant, Charles Denny IV, Charles Scruggs, (Disbarred) Heather Gray ET AL., Judges and “OTHERS”, Townsend since 9/8/1999 has been “impeded” as confirmed per the ruling(s) of the 11th Circuit Court of Appeals and FSCt Chief Judge Charles Canady and Judge Marva Crenshaw and admissions of Charles Denny IV on 5/10/2006, per the transcript now in the courts files, from Townsend doing his duties to and for the Religious Society proving the criminal acts of all Defendants illegally for their Malicious Enterprise the Plaintiff’s Proceeds and then the abduction of Townsend’s children since 1999;**
- C. Per Florida Constitution Article 1. Section 3, illegally using State of Florida money and legal services for their “sect” agenda**

alleging “Under Color of Law” they have a Right over that of the Contract Right of the General Membership and Tax paying citizens despite the Breach of Contract these Jeffers ET AL continue since about 10/1994 as they admitted illegally using Plaintiff’s Proceeds in violation of F.S.817.02, Obtaining Property by false personation and per F.S.120.69(1)(b),(c), Administrative Procedures Act;

D. The BYLAWS specifically state members should not take other members to court yet Defendants here illegally for their Malicious Enterprise fraudulently and criminally charged Member Townsend in these underlying cases 01-15813 and 01-15814 and 02-4974, now proved to be acting per the Bylaws protecting the F.S.617, Not for Profit Corporation and the members who elected him as Denny IV confessed on May 10, 2006, per the transcript filed with this court and Judge Crenshaw intentionally and knowingly agreed and then by her recusal admitted her own intentional participation in their crimes since 2003;

E. Just as Defendant John Grant a.k.a. Florida Senator Grant, admitted on 11/10/12, he used his political and proved illegal lawyer influence exparte with “alias” judge Arnold since 2003, and with others as attorney Denny IV alleging to be for the FBCCP Corporation and all members at large, with “alias” Judge Crenshaw, who illegally removed defendant(s) Jeffers’(s) even

though he had been timely and legally served, the “Government Veil” as Plaintiff Townsend has alleged for many years shows “Benefit” to “alias clergy” and a “masked” Under Color of Law defendant and as Judge Crenshaw and Charles Denny IV conceded on May 10, 2006, by their jointly writing the majority of complain now as filed, 15CA1928.

F. As this Defendant’s Motion is filed beyond the 20 days from being served their individual summons.

WHEREFORE, Plaintiffs move for the fullest sanctions on Defendants for their violations of Contracts (OUR FBCCP BYLAWS and Florida Constitution) and Laws and for Plaintiffs to be reimbursed and compensated to the fullest relief per our laws.

Respectfully Submitted by:
Randall Townsend, Pro Se and Per F.S.617.0834
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was provided this day of 8/12/2015 by hand 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;
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corourke@dglawyers.com; scruggspa@aol.com; kkharrod@gmail.com;
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 12 DAY OF August, 2015,
BY ID PRODUCED _____**

NOTARY PUBLIC: _____

Respectfully submitted,

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