

**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 NOTICE OF INTENT
AND REQUEST FOR EMERGENCY
HEARINGS AND ORDER(S)**

**COMES NOW, RANDALL TOWNSEND, PRO SE, FOR ALL PLAINTIFFS AND
STATES:**

**1. Plaintiffs Intend to supply more factual evidence in addition to what
has already been filed and proved since 1988 and Prove THE ONGOING
MALICIOUS ENTERPRISE of Unlawfully taking of Townsend's Proceeds
since 1987, was for McCarthy to conceal her malfeasance of not
immediately in 11/1987, getting Subpoena's for full disclosure of the
Contracts and Customer Orders and Payments of which Townsend owned
and allegedly solely owned by Lane but later discovery proved owned by
Townsend and non exposure allowed the Lane(s)/Crenshaw/Publix ET AL
as Democrats (with Governor Lawton Chiles, Linda Chapin and her**

attorney husband Bruce Chapin etc.) to conceal Lane/Publix ET AL'S illegal acts of Drug Use, Extortion and Bribery and illegal Donations and Quid Pro Quo Acts for Political Candidates and then subsequently, Republican Party and Political Leadership (Grant, Bush(s), Conner, Mel Martinez, Ander Crenshaw with their and Plaintiff's legal counsel David Gibbs since 1991) upon learning in or about 1994, saw opportunity in their plot to continue to portray "In a False Public Light" Townsend as a "liar" and "incompetent" at Matters of Law as they intentionally conspired to provide "ineffective dishonorable services" and Matters of Facts and continue the Defamation and Malicious Prosecution to oppose any Truth Townsend per the Law Alleged and thus illegally take the control and the proceeds from "Religious Societies" as herein the First Baptist Church of Citrus Park and this Corporation Not For Profit's School Ministry of Citrus Park Christian School since 1994, and other's as NOT FOR PROFITS by a Malicious Prosecution and demand from Publix equal or additional proceeds and Republicans also establish "imbedding" others in Non For Profits who divert proceeds and fail to properly allow discovery of Business Records.

2. Plaintiffs allege that our proceeds are then used by Democrat or Republican Leadership to solicit and entrap potential individuals as candidates to join their Malicious Enterprise in order to receive Campaign Resources and Quid Pro Quo protection as "immunity" and other benefits.

3. Plaintiffs allege that as part of the Malicious Enterprise that then

“individual(s)” once in their Political Office and or Government Positions as these co-participant “Agents” illegally use self-alleged immunity unlawfully imputed to themselves to continue their F.S.768.28, “Bad....” Malicious Enterprise as agreed and exposed as stated in the Complaint written 5/10/2006, as also bribing only Townsend with money to end his proofs of Defendants and others unknown” continuing Malicious Enterprise by “alias” Judge Marva Crenshaw and “attorney Denny IV as:

“6. THESE MEMBERS AT LARGE OF THE F.S.617 CORPORATION “Not for Profit” AND OTHERS WHO THEN KNOWINGLY, WILLFULLY AND INTENTIONALLY VIOLATED KEEPING TO THEIR FIDUCIARY DUTIES TO ALLOW PLAINTIFF TO REVEAL HIS KNOWLEDGE OF THE “SECRET FUNDS” AND OTHER FLORIDA STATUE VIOLATIONS BY THE DEFENDANTS-THESE MEMBERS AT LARGE AND OTHERS BECAME CO-CONSPIRATORS AND DID EXTORT TO DAMAGE THE CHARACTER AND REPUTATION AND UNLAWFULLY ABDUCTING THE CHILDREN AND PROPERTIES OF THIS PLAINTIFF BY ALLOWING AND GIVING THEIR VOTE OF APPROVAL FOR AND THEY BY PAYING FOR THE CHARGES TO BE FILED AND BY BEING WILLING TO CONTINUE OFFERING KNOWN FALSE TESTIMONY IN SAID CASE OF MALICIOUS PROSECUTION AS ACTED OUT BY RON BECK AS INDIVIDUAL AND AS PER HIS OWN SHAM TESTIMONY TO JUDGE PALOMINO ON NOVEMBER 23, 2001.... 7A. Defendant Karen Kay Harrod Townsend additionally willfully, knowingly and intentionally acting in collusion for herself and other co-conspirators did in her action of case 01-15814, as a Domestic Violence Action brought with the actions of Ron Beck ET AL but as cases in the hearing attorney Scruggs and judge Palomino and others acted to conceal true facts, Rights and children from Plaintiff so to continue the extortion, emotional distress, frauds and illegally unjust enrichment for themselves and others since Townsend exposed crimes of Lane(s) ET AL to attorney Patricia McCarthy in November 1987 and since.... 11. Plaintiff also had a duty as described above and herein and was asked by others to investigate and to report other acts of Negligence and Frauds and Conspiracy and Conspiracy to Defraud when Pastors and others with the Finance Committee members and trustees sought to defraud the Membership, Government Agencies and individuals, including Plaintiff’s wife and minor children and Parents and even now the Courts when Defendants continue to try to allege Plaintiff is a “Liar”, Sower of Discord”, Dangerous” due to a “Stress Related breakdown and a “Stalker” or a

“VIOLENT MAN.” All accusations are pure frauds by Defendants to cover up their illegal conduct and violations of the BY-LAWS as attached herein...in an effort to allow Defendants to conceal their frauds to the membership and to the courts and government agencies including false reports to alias law enforcement officers....”

4. Plaintiffs allege this is the lawful Cause of Action as verified by multiple rulings and even the confessions of Defendants and Others.

5. Plaintiff allege that Governors and Cabinet members and Legislative and Party Leadership have illegally conspired and breached their Fiduciary Duties and used “secret funds” gained at Townsends and Plaintiffs proceeds to advance and fund their Malicious Enterprise since 1987, to remove Constitutional and Civil Rights and proceeds of Plaintiffs as even a Religious Society illegally crossing all lines of separation of Church and State Defendants allege and affirm they are not allowed to violate yet they knowingly and intentionally illegally implanted “alias” deputies Howlett, Jeffers, Corbin and Smoak” as their inferior agents to “impede”, Breach and violate Plaintiffs, Under Color of Law and Under Color of Uniform Masked as lawful agents.

6. Plaintiffs allege each paper filed by these Defendants since the 1988 Counter Claim continues the McCarthy/Popper/Lane, Publix, Williams, Chiles ET AL Malicious Enterprise to: fraud Plaintiffs; do extrinsic fraud to Plaintiffs; and an Honorable Court; and are Fraud(s) on the Court; by “alias” lawful officers of the Court as violations of their Oaths to honor and obey the Constitution of the United States, and the Constitution of the State of Florida and these as Contracts of their employment and as also a

contract known as the BY-LAWS of the FBCCP and contract known as the Townsend/Lane Joint Venture Agreement of August 7, 1987, and contracts of employment Townsend had with his various employers or as their Broker Agency and their BLACK LAW RULES.

7. Plaintiffs state that per their “PLAINTIFF’S RENEWED SECOND VERIFIED MOTION FOR DISQUALIFICATION OF JUDGE BARBAS AND MOTION(S)” filed May 10, 2007, as Federal Judge James Moody Jr. was advised on March 15, 2007, as “alias” Judge Marva Crenshaw wrote on May 10, 2006, the Malicious ENTERPRISE FOR “ILLEGAL” AND “INEFFECTIVE SERVICES” AS STATED MULTIPLE TIMES BY THE 11TH CIRCUIT COURT OF APPEALS, THE CHIEF JUDGE OF THE FLORIDA SUPREME COURT, CHARLES CANADY AND THE FIFTH D.C.A. IN THE ROBINSON ORDER, CONFIRMING TOWNSENDS PLEADINGS AND FACTS AS LAWFUL AS WRITTEN TO JUDGE POWELL AND OTHERS SINCE CAN NOW BE SUMMARIZED AS FACTS OF THESE FACTS AND LAWFUL AS MATTERS OF LAW FULLING PROVING THE MALICIOUS ENTERPRISE AND THESE DEFENDANTS KNOWN AS INTENTIONAL CO-CONSPIRATORS IN THESE CRIMES SINCE 1987 OR BEFORE BUT STILL NOT STOPPED UNTIL PLAINTIFFS GET FULL DISCOVERY, AND HAVE A LAWFUL JURY TRIAL AND ARE GIVEN FULL RESTITUTION FROM ALL DEFENDANTS AND DEFENDANTS BE PROSECUTED CRIMINALLY PER THE FULLEST EXTENT OF OUR CONSTITUTIONAL LAW AS OUR CONTRACT WITH ALL CITIZENS.

8. Per the Florida Tort Claims Act (Not requiring claims-filing

requirements for individuals) and F.S.501, Deceptive and Unfair Trade Practices and Fraud at Law per Lincoln-Income Life ins. Co v. Krause 132S.W. 318, 321,279 Ky 842, “a false representation of a matter of fact which deceives and is intended to deceive another so that he shall act upon it to his legal injury” by these defendants causes damages to Plaintiffs. And as these Malicious Enterprise acts try to be continued Plaintiffs seek immediate restitution and relief to the fullest extent of our Laws.

WHEREFORE, Plaintiffs move for this court for an EMERGENCY ORDER AND immediately:

1. Find Mark Ober, individual, in Default and issue a form 1.917 as an individual for acts he did before becoming illegally receiving proceeds and thus elected as State Attorney;

2. Find Bruce and Linda Chapin in Default and issue a form 1.917

3. 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 have threatened Plaintiffs as HCSO McDarby recorded in case 13-DR-005128, 4/3/2013, by informed co-participant Defendant Judge Barton, and requested to be incorporated herein, and lawyers even by Denny ET AL of threats of 8/14/2015, of new illegal sanctions he alleges to file and Process Servers and or have been difficult for process servers to locate;

4. Deny any and all Defendants Motions.

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

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

Respectfully Submitted by:
Randall Townsend, Pro Se and Per F.S.617.0834
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941 350-2677
FOR ALL PLAINTIFFS
Jfyr59@hotmail.com
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was provided this day of _____ 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; 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 ____ DAY OF _____, 2015,
BY ID PRODUCED _____
NOTARY PUBLIC: _____
Respectfully submitted,

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