

**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 MOTION FOR RECONSIDERATION TO VACATE
THE ORDER OF AN "UNKOWN JUDGE" AND
OPPOSITION AND REPLY TO THE COURTS HEARING ON
THE ORDER VACATING CLERKS ORDER OF DEFAULT ON MARK OBER,
INDIVIDUAL BASED ON ILLEGAL MOTION OF ASSISTANT ATTORNEY
GENERAL SHELLY CRIDLIN (Cridlin).**

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

**1. The Order of the Court August 7, 2015, #150807, electronically dated
at 2:56 PM is a Fraud at Law and thus Fraud on the Court and prejudicial to
Plaintiffs and other Florida citizens.**

**2. Plaintiff's filed "PLAINTIFF'S ADDITIONAL OPPOSITION AND REPLY
TO DEFENDANT MARK OBER, INDIVIDUAL, date stamped by the clerk on
August 6, 2015, @16:57 PM, AS SUED HEREIN AS PER THE SUMMONS
SERVED ON JUNE 24, 2015, UPON HIM, AS INDIVIDUAL, FOR LATE AND**

**UNLAWFUL MOTION(S) AGAIN FILED BY A.S.A. CRIDLIN” and prior to the
“Unknown Judge” Order #150807, electronically filed on August 7, 2015
@2:56PM.**

3. The Cridlin teams actions and Motion(s), contain Fraud on the Court and violations of Due Process, OATHS and Contracts and by use of fraud this, Vacating and Setting Aside the Clerks Default Order on Mark Ober, Individual, is “Null and Void” as a Matter of Law and our Constitutions as “No law shall impede the obligation of a Contract”.

4. Plaintiffs actually legally per the rules of R.O.C.P. Form 1.917 NE EXEAT and Matters Of Law as already in the records of this case and or as Defendants already advised can be put in this case record as or already filed in the underlying or related cases proofs of Law that show each defendant named on Plaintiffs Exhibit FRAP 26.1 as filed in FEDERAL CASE 8:12-CV-1198-T-17EAS, as:

Randall C. Townsend, First Baptist Church of Citrus Park, Citrus Park Christian School, Religious Society Members, J.D.T., J.G.T., Members of Citizens Classes ET AL vs. Heather M. Gray, THE FLORIDA SUPREME COURT AND NAMED JUDGES AND OFFICERS, THE FLORIDA BAR, THE STATE OF FLORIDA, GOVERNOR SCOTT, ATTORNEY GENERAL PAM BONDI, STATE ATTORNEY MARK OBER ET AL, SHERIFF DAVID GEE ET AL, FDLE, JOHN GRANT ET AL, PATRICIA McCARTHY ET AL, DAVID POPPER ET AL, BRUCE E. CHAPIN, MEL MARTINEZ ET AL, CHARLES SCRUGGS, DAVID GIBBS III, CHARLES E. LANE JR., CHARLES E. WILLIAMS, CHARLES DENNY IV, JEB BUSH, GEORGE W. BUSH, RON BECK ET AL. TIM JEFFERS, JOE HOWLETT.....”

named and continued herein by reference per exhibit Plaintiffs 21, As Attached herein should be detained per FORM 1.917, NE EXEAT by the clerk and the court as the defendant has breached Contracts and violated

laws [F.S.817.02, Obtaining Property by false personation, and acts per F.S.120.69(1)(b),(c), Administrative Procedures Act] with this State and Plaintiffs and therefore may flee the jurisdiction of an Honorable Clerk, Court and Law Enforcer and thus “impeding” Plaintiffs timely service of this Complaint. The basis of this Request of the Clerk and the Court is Plaintiffs proceeds have been illegally gained by a Malicious Enterprise and said proceeds have by Defendants been unlawfully distributed to Defendants and others via political Donations or other means from or belonging to Plaintiff Townsend as illegally RICO gained money by Charles E. Lane, Jr. as Sabal Marketing/Sealane Marketing/Publix Supermarkets and or THE First Baptist Church of Citrus Park/ Citrus Park Christian School diverted money by a “Sect” lead by illegally imbedded “under color of law” non-member Deputy Tim and his wife Karen Jeffers and Deputy Joe Howlett and others the lawyers and State Officers continue to illegally co-conspire per torts of the FBCCP Bylaws illegally using FBCCP proceeds or other monies due per contracts for services rendered and distributed to these attorneys and State Officers illegally as proved by transcripts to Judges of this 13th Circuit Court since 2001 to Judge Palomino to Judge Arnold and through to Judge Barbas and now to this Court by the gaining of this Order that both Democrat and Republican Candidates who prior to their taking office willfully and knowingly agree to assist their co-participants in the Malicious Enterprise, as Townsend reported to his attorney Patricia McCarthy and others since 1987.

5. Plaintiff's filed, Forms 1.917, NE EXEAT Motions On Defendant Mark Ober, Individual, Bruce Chapin, Individual and Linda Chapin, Individual , and Plaintiff's Opposition and Reply to Defendants John Harkness, Individual and Marva Crenshaw, Individual, and "PLAINTIFFS ADDITIONAL OPPOSITION AND REPLY TO DEFENDANT MARK OBER, INDIVIDUAL, AS SUED..." with the Clerk August 6, 2015, at 16:57 PM, and at August 7, 2015 at 16:00 PM, for 18 minutes, Plaintiff Townsend discussed with Clerk Supervisor Angel that Plaintiff's filed Motion stamped 16:57 on the 6th, was not yet on the docket or in the court case file but was being held somewhere by the Clerks. Supervisor Angel, then located the Motions and had them scanned in by another clerk while we were on the phone. Note these attached exhibits of Plaintiff's emails as confirmation for the record.

6. Additionally, note these attached exhibits point to the fact that Townsends email at 7:33 PM, Details writing that the:

"Plaintiff's Additional Objection...is incorrectly filed as dated August 7, 2015! This immediate problem is this is filed August 6 and should have been in the case file to be Plaintiffs Points of Facts and Law to be considered before the "Unknown" "alias" judge order to vacate the Clerks Default on Mark Ober, Individual, as illegally answered by the Attorneys General Assistant Cridlin! I hope this clerk's office will advise the "Unknown" alias judge who issued the August 7, 2015 ORDER as Plaintiffs points of law prove this order is wasteful of the Courts time and a Fraud on the Court per our Florida Constitution. The delay or mistake by the clerks office to not have this docketed August 6, 2015 should not punish plaintiffs after these over 10 years of proofs of being victims of Defendants crimes that have no statute of limitations.

Please provide me the name of this unknown judge and who attended the unannounced exparte hearing.

Thank you, Randall Townsend, For all Plaintiffs"

7. The Clerks, Anne, at cubicle #8, and Supervisor Angel and others, on August 6, 2015, were not sure what to do with the Plaintiff's Motions and the Motions for NE EXATE FORMS 1.917, on Individuals, Mark Ober, Bruce Chapin and Linda Chapin, and due to the late hour advised Townsend they would definitely: (1) issue the NE EXEAT'S the next morning; (2) determine a Bond value because like Defendant John Grant going to Canada for some unknown time they did not want these Defendants to flee as well as Bailey, Arnold, and now even Barbas and others are being hard to locate; (3) call or email Townsend in the morning as to who set the Bond Values. The call or email was not received so Townsend contacted the Clerks office.

8. Despite the fact that on Monday, August 3, 2015, Townsend requested the Clerks do research as these Form 1.917's would be filed on August 6, 2015.

9. But the clerk did not file the Motion Papers Objecting to the Defendants Motion to Vacate and Setting Aside the Clerks Default Order on Mark Ober until August 7, 2015, almost 23 hours later in the afternoon after Townsend contacted Clerk Supervisor Angel asking the status of the Form 1.917 NE EXEAT Orders on Mark Ober, Individual, Bruce Chapin, Individual, and Linda Chapin, Individual who upon properly being served had not at the time of Plaintiff's filing for Default had not filed answers of any type.

10. Now in the attempt to "UNRING THE BELL" after the hearing by the "Unknown Judge" the Docket has been fixed as the Clerk's Office now after receipt of Townsend's email to Supervisor Angel has changed the filing

date from August 7, 2015 and rolled back to August 6, 2015, on the **PLAINTIFF'S ADDITIONAL** opposition and reply to **"DEFENDANT Mark Ober, Individual, as Sued..."**. But it appears the Clerk's officer error may not have had all Plaintiffs Motions as **"Oppositions and Reply's"** in the file at the time the **"Unknown Judge"** allegedly heard arguments **Exparte** without Plaintiff or just acted per the directives of Defendants ignoring Due Process.

11. Monday August 10, 2015, at 17:42-47, PM, Clerk Supervisor contacted Townsend to advise her response to his emails from August 7, 2015 and stated the **PLAINTIFF'S ADDITIONAL OPPOSITION AND REPLY TO DEFENDANT MARK OBER, Individual, AS SUED HEREIN THE SUMMONS SERVED ON JUNE 24, 2015, UPON HIM, AS INDIVIDUAL, FOR LATE AND UNLAWFUL MOTION(S) AGAIN FILED BY A.S.A.CRIDLIN** was scanned in on August 7, 2015 at 08:56 AM. Supervisor Angel also advised that Judge Nash via electronic mail signed the **ORDER** in the absence of Judge Barbas out for some yet unknown time due to medical issues and upon his return to then take over this case.

12. Plaintiffs were not notified of any hearing on Defendants Motion To Set Aside or Vacate the Clerks Order, nor allowed oral arguments and Plaintiffs allege and believe this unlawful especially in light of the facts that Plaintiffs Motion(s) were possibly not before the court and Plaintiffs allege the conspiracy for the illegal taking of funds and Rights from FBCCP/CPCS deals with unlawfully imbedded Sheriff Deputies and lawyers in violation of

the BYLAWS and the FLORIDA Constitution without proper vote of the Nominations Committee and Recommendation of the Nominations Committee to the Church Congressional Body for the Church Congressional Body's vote of Approval to these members Joe Howlett and Tim Jeffers to become Trustee's of or to speak for the Corporation was done illegally by TORTS by these masked "UNDER COLOR OF LAW" "alias" "law" enforcers in collusion with Republican Senator John Grant (admitted bribing judge Arnold and which Lawyer agent Charles Denny IV did frauds since 1/21/2003 to various judges "impeding" these rights of the F.S.617 Corporation "Not for Profit" as Townsend the rightful member/representative advocates against the "Sect" and their agents.) A.K.A Registered Agent and "alias" responsible lawyer for the FBCCP Corporation with David Gibbs III alias "responsible" lawyer for the Corporation and as agents of the Republican Party able to direct "secret funds" to their prospective candidates as State Attorney's, Attorneys Generals, Governors, Judges, Legislators and any to be elected candidate who willfully and intentionally aids and abets in this matter or in other Religious Societies or Not For Profits the use of funds to candidates without full disclosure and per the FBCCP Bylaws the line item budgeting and authorization for payments of these funds to any candidate who then upon taking office ignores the violations of laws and "impedes" these members from 1. Discovery of Business records since 1994; (2) resorts to the improper removal of funds from the designated funds of the

membership to the Corporation; (3) unlawfully removed elected officers who lawfully attempt to respect and follow the Bylaws and report the Florida Constitution Article I. Section 3. Violation and Thefts; (4) then unlawfully use defamation, false imprisonment, extortion, interference with Contract Rights, child abduction of two children, interference with child custody with 2 children, Malicious Prosecution with “Hate Crimes” and violations of Due Process still in 2015, by filing Frauds on the Courts by the then illegally elected Officers claiming Sovereign or any Immunity and then the Default Order is set aside by an “unknown” judge with potential prejudice due to be appointed to the case or elected to the bench by a Governor knowingly since 1994 or before who instigated and conspired to continue the Malicious Enterprise since 1987 or before, using the FDLE, FLORIDA BAR and FLORIDA SUPREME COURT JUDGES alias Immunity and “secret funds” as I.O.L.T.A and F.L.M.I.C and State Treasury Funds and F.S.16 funds and or other funds from F.S.960 Victims Assistance Funds and other funds to aid and abet the Malicious Enterprise continued by attorneys Gaylord, Scruggs, Gray, Denny, Turmel, Solomon, Rolfes, and others unknown until full disclosure of documents are produced as has been demanded since 1987, from Sabal Marketing, Publix Supermarkets, FBCCP/CPCS, SUNBELT EQUIPMENT COMPANY, KMART and Others to connect who gained the Unjust Enrichment of Townsend’s proceeds from the August 7, 1987, Joint Venture Contract and other proceeds earned or paid for allegedly “legal Honest Services” but gained by frauds of these

participants since 1987, specifically directed by attorney Patricia McCarthy, Charles E. Williams Jr., David H. POPPER, Bruce Chapin, Linda Chapin, Pat Bean, at the directives of Governor Lawton Chiles, Buddy MacKay, Jeb Bush, Charlie Crist, Rick Scott and Attorneys General Pam Bondi, Bill McCullom, Charlie Crist, Bob Butterworth and Sheriff Deputies of Hillsborough, Pinellas, Pasco, Polk, Orange, Santa Rosa, Escambia Counties and others as agents to prior to their obtaining office received election funds or proceeds from these corporations or individuals who aid and abet the Malicious Enterprise condemned by the Florida legislators since about 1987 but who also received proceeds from the Malicious Enterprise of LANE/Publix et al against the public citizens as Plaintiffs here.

13. Defendants filed their DEFENDANT MARK OBER'S MOTION TO VACATE AND SET ASIDE CLERK'S DEFAULT electronically on 7/31/2015 @02:30:52PM.

14. Plaintiffs timely filed the Motion(S) For Default to the Clerk on Individuals, Mark Ober, Bruce Chapin and Linda Chapin July 28, 2015, and asked to see the clerk to do the Defaults right then but was denied because the Clerk did not know where the Default Clerk was.

15. Plaintiffs then that day emailed to the Defendants including S. Cridlin that Plaintiff had filed the Motion(s) for Default. This then alerted the Defendant Mark Ober, Individual and his agents to spring into this another aid and abet illegal action.

16. Defendant Mark Ober, Individual in fraud claims he had no prior notice of these pending case issues despite evidence here below of just a few times Mark Ober, Individual has been alerted to his personal criminal aiding and abetting in multiple crimes as even Denny IV warned to Judge Arnold back since 1/21/2003, the State and Courts view of entanglement inside Church Matters, yet they ignore that Deputies Howlett, Jeffers, Smoak gained their positions illegally per the Contract of the Bylaws and that Senator Grant and or as other lawyers “Impede” Townsend from his proved in 2006, by the production of partial business meeting records that Townsend is the elected Officer, not the Deputies or Grant ET AL by their torts to the Contract of the Bylaws, The F.S.617, Corporation Not for Profit and the non-sect member/citizens which defendants ignore for their protection and continuation of the Malicious Enterprise.

17. Victims Assistance Program of the STATE ATTORNEY agents, Curtis Baughman since the November 15, 2001, hearing(s) before Judge Palomino cases 01-15813 and 01-15814, knew from what he witnessed in the court (supported by Transcripts available for the court) and in his consultations with Charles Scruggs and others. Also Curtis Baughman was fully updated with Townsend in a follow up meeting later that same month as attorney Scruggs abandoned his clients saying his work on November 15, 2001, was not needed and said Townsend would not help to recover his property in the 1/2002 Hearing where Judge Palomino continued the Malicious Enterprise to take Plaintiffs proceeds and “impeded” Townsend’s

Complaint on Defendants as a “Sham” and requested damages. Curtis Baughman admitted that they were illegally acting for HCSO Deputy Howlett et al and in 2006 Baughman and his supervisor Nancy Lopez in their office freely admitted to Townsend after 5/2006, they were told to directly from their boss(s), {Mark Ober is the 13th Circuit State Attorney and Pam Bondi, Patricia McCarthy and Heather Gray, Charles Scruggs and others were State Attorney Agents with F.S.768.28(9)(b) malicious motives to prejudice Plaintiffs herein} to fully assist HCSO Deputy Joe Howlett advocate his case against Respondent, Randall Townsend now proved as frauds to conceal defendants Malicious Enterprise to defame Townsend since 1987, as Denny IV, confirmed to judge Arnold, January 21, 2003, and on 5/10/2006, conceded Howlett and Others and Denny’s criminal Malicious Continuation of the Enterprise for defamation and proceeds by “Hate Crimes” on Townsend and those for whom he speaks.

18. Public Records show while Charlie Scruggs acted “allegedly with honest services” as counsel for Plaintiffs, he failed to disclose he was also working at the same time for and with being paid by the Courts, State Attorney’s, Attorney’s General’s and multiple others as a conflict of interest with prejudice per the Florida Bar Rules and Black Law Rules to please the state agents who paid him more money yet the FSCt and the Florida Bar ignore these reported violations.

19. Public Records from the Florida Supreme Court Case SC09-1121,

THE FLORIDA BAR v. HEATHER MARY ANN GRAY in her CONDITIONAL GUILTY PLEA FOR CONSENT JUDGMENT shows representations of clients in the State Court systems while she was alleging to fully represent Plaintiff's herein in their proved illegal issues against those who were dueling paying her and thereby fully had the opportunity to aid and abet the State Attorney and Attorney General continue F.S.768.28(9)(a) Bad Faith...Wanton and willful disregard..." especially with the abduction from assembly of children and business records and due process legal "honest services from Townsend and those for whom he speaks since 1999.

20. Additionally, Attorney General Pam Bondi has also had multiple services done on her and even in this related Townsend v. Gray case had Mark Dunn process a Motion to Dismiss on her behalf during this related case in 2012 and 2013 clearing addressing these same violations of law that herein the same Attorney General (Bondi) and same State Attorney (Ober) now use others illegally to use their office for FRAUD ON THE COURT and Plaintiffs whom they are allegedly to protect and serve yet they knowingly aid and abet as the John Grant emails show and the Transcripts of Admissions by their Attorney Charles Denny IV and Judge Crenshaw and Judge Charles Canady and the emails of HCSO Master Detective John McDarby showed continued Defamation, Frauds, Malice, Prejudice by "Hate Crimes and Malicious Prosecution as "Bad Faith..." F.S.768.28(9)(a) patterns of actions confirmed by Charles Canady, Individual, he had knowledge of and participated in with others herein as Chief Judge of the

Florida Supreme Court, 2DCA, switching parties to be Counsel for Governor Jeb Bush, Florida House of Representative, Lakeland Attorney, affirms continued back to 1987 or before knowing the acts of his father as Senior Advisor for Governor Lawton Chiles and alerted again to the illegal Malicious Enterprise in the Townsend Amicus Brief filed in the disbarment case against Plaintiff's alleged honest services lawyer Heather Mary Ann Gray and alerted that Florida Supreme Court Judges had not properly taken their oaths of office and at said relevant times did "Impeding" the legal rights Plaintiff has pled since about 1987 through their courts and as per the 5th DCA Case of ROBINSON, proved Townsend was illegally impeded and defamed by these said alleged justices illegally using their alleged authority and illegally using P.C.A. legislation not per the intent or vote of the Citizens of Florida to "impede" or violate their own due process of Constitutional Rights.

21. By admissions of FSCt. CHIEF JUDGE Charles CANADY and that as June 30, 1994, Jeb Bush was fully informed and in 1994 Ken Conner as Legal Counsel of the Republican Party For Florida was fully informed and former law partner with Mel Martinez and in 2007 Nationally, Mel Martinez, as Republican Chair being fully informed during the 1990's and as a successor to Linda Chapin as the Chairperson of the Orlando County Commission each was fully informed and was able to acquire the proceeds of Townsend extorted illegally by Lane/Publix and Townsend's lawyers illegal practices in this Malicious Enterprise.

22. Additionally, Per F.S.943.03(2) Department of Law Enforcement:

“Upon the specific direction by the Governor in writing to the executive director, the department shall investigate the misconduct, in connection with their official duties, of public officials and employees and of members of public corporations and authorities subject to suspension or removal by the Governor.”

Multiple documents served to Mark Ober, and his co-conspirators connect his knowledge and intent to act in “Bad Faith...Wanton and Willful disregard...” against Plaintiffs prior to his becoming State Attorney but as individual. The FDLE agents Michael O’Connell, Cindy Sanz and others has admitted conducting investigations of misconduct and Plaintiffs demand full production of all related materials to these investigations.

23. On May 10, 2006, Judge Marva Crenshaw and Attorney Charles Denny, IV representing these same defendants wrote the complaint that states they agreed these violations of laws are even “Hate Crimes” proved to be willfully, intentionally and knowingly participated in the “Hate Crimes” against a Religious Society as the members and the F.S.617 Corporation Not for Profit and the members as for whom Townsend as the Rightful Nominations Committee Member as the “sect” defendants and their co-conspirators up to then and now still in 2015 of which Mark Ober, claims he had no prior notice yet he acted with Judge Barbas and Denny to illegally dismiss the underlying case because they allege Townsend violated their what is proved illegal orders (Null and void by law) and Frauds on the Court they admit too in collusion doing. Emphasis Added.

24. Plaintiff’s again show that over these years of this case since 1987,

Plaintiff Townsend and for those he speaks has fully informed State and Federal “alias” “Law Enforcers” as partly listing the names as filed in the FRAP 26.1 Filed in the Townsend v. Gray Federal Case even to the 11th Circuit Court of Appeals in case 12-13892 who had jurisdiction and supervision of these Civil Rights violations of or by Malicious Prosecution still in 2013 now continuing in 2015 and forever as long as these defendant continue their frauds and interference with assembly and production of records and take proceeds of these citizens so they can illegally keep their jobs.

25. Federal Officers U.S. Attorney Robert O’Neill, Chief Judge Conway, Judge Kovachevich, Judge Merryday, Judge Moody, Jr., Judge Wilson and Gregory Pressnell, Mel Martinez, Mark Rubio, Bill Nelson and FBI Officers and others have been informed through verified documents of these “Hate Crimes” Plaintiff’s report and in this complaint state simply and plainly “violated keeping to their Fiduciary Duty to allow Plaintiff to reveal his knowledge of the “Secret Funds” and other Florida Statute Violations by the Defendants... and did exhort to damage...frauds...hate crimes...tort interference with custody...”.

26. Plaintiff’s then confirm the proper Due Process is require the Clerk and the court to issue NE EXEAT 1.917 on all Defendants as upon proofs already known to this court multiple defendants have fled the county or state and upon their arrest, prosecution or conviction their reimbursement of their salaries and pensions are to be returned to the Governor of this

State, so these State Attorney's and Attorney's Generals if in proper allegiance to their Oath to serve our Constitution and State and these Plaintiffs as their employer/citizens they should be advocating filing properly answers and form 1.917 and paying the BOND to prove their innocence.

27. So the court is saying through this illegal Counsel and "unknown judge" that Mark Ober, Individual, or others, did not have to perform his Official Duty to report crimes to the State of Florida Division Of Risk Management and requesting legal representation until a victim hires a process server and serves him Individually, asking him to stop crimes that Mark Ober, Individual, personally directed for almost 14 years or more.

28. So the court is saying, Mark Ober, as State Attorney, can continue illegal actions done through Mark Ober, individual, and then allege he in his "person" has Sovereign Immunity or Absolute Immunity to intentionally Breach his Oath, Contract for Services and "Honest Services" to the citizens he is entrusted to protect even from State and Federal Agents and other criminals.

29. The July 31, 2015, "Defendant Mark Ober's Motion to Vacate..."

A. Paragraph 4, alleges to take advantage of what R.O.C.P. 1.540(a) "Clerical Mistake" and "(b) Mistake, Inadvertence, Excusable Neglect, Fraud, etc." ALLOWS TO THEIR ADVANTAGE yet Plaintiffs are disadvantaged by the "mistake" of the clerk for not knowing how or who to give the Motions to Default in the Clerks office on July 28, 2015, for

immediate processing because the Clerks offices had recently been moved or that Plaintiffs Motion was not filed timely on August 6, 2015, nor were Plaintiffs allowed to argue these point of facts and laws herein before a non prejudiced Court of Law per our Constitutional Rights.

1. Plaintiff's allege that if Defendants had not received Plaintiff Townsend's email after giving the Motions for Default to the Clerk for immediate processing then Defendants would not have even tried to act by July 29, 2015 by faults of the Clerks office not these Plaintiffs.

2. Additionally, the date of July 29, 2015, rolling BACK TO but not including the day of service of JUNE 24, 2015, THE DAY OF THE PROCESS SERVICE ON MARK OBER, INDIVIDUAL, NOT MARK OBER, STATE ATTORNEY, IS BY THE COURT TO BE COUNTED AS 35 DAYS as after the records of these related cases show Mark Ober Et Al has had over 10+ years of personal notice upon which he did not act per his duties he now claims he "immediately" did.

B. Paragraph 5, alleges "that appropriate service of the responsive pleading was made on or prior to the date on which the default was entered." Yet this is not the relevance of time of these Clerks events as:

1. the date of the responsive pleading was due to the fault and negligence of the Clerk's not processing Default's on the prior day, July 28, 2015, as Plaintiffs requested and instructed how he had done it in the past on Defendant Heather Gray, Individual, Heather Gray, Attorney At Law and Heather Gray, P.A., but this time the Clerks office could not comply;

2. The Default Clerk, Stephanie, Gaskins, on the 29th of July, processed the 3 Defaults while Townsend waited at the Clerks counter area and viewed the docket with the clerk(s) which in in conflict with Defendants exhibit (c), but shows another sequence mistake of the Clerk and prior to the date stamp time of 03:24:10 PM OF THE E-FILING OF THE “DEFENDANT MARK OBER, STATE ATTORNEY FOR THE THIRTHEENTH JUDICIAL CIRCUIT’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT WITH PREJUDICE AND MEMORANDUM OF LAW.”

C. Assistant Attorney General Cridlin’s Motion for Mark Ober, State Attorney, which in passing states in ¶2. “and his Complaint also names as a defendant Mark Ober, in his individual capacity and in his official capacity as State Attorney for the Thirteenth Judicial Circuit.”

1. And the relief requested only is for the benefit of State Attorney Ober and Cridlin et al does not appear to speak, represent or present cases which show Mark Ober, Individual, has been responsive to the Complaint served on him Individually, even for actions he as done prior to becoming State Attorney which per the law his co-participants with him before becoming State Attorney continue their same Malicious Purpose and now illegally using their State Office Positions, Proceeds, Resources, State C0-Workers and private individuals in violation of the Public(x) use of funds and our FBCCP Members or Corporation F.S.617 “Not For Profit” proceeds and property even by deception of Civil Rights and defamation of

Townsend ET AL since 1987, even illegally then abduction of his children through 2015 without due process or probable cause.

2. The Notice of Appearance of July 29, 2015 is only filed for State Attorney Mark Ober.

D. Paragraph 6 and 7, alleges Excusable Neglect when the benefit of Mark Ober, State Attorney and his illegal use of his Offices or Other Offices “public” agents is to benefit Mark Ober, Individual, as the meritorious fact in this case that he has individually misused since 2001, becoming State Attorney and prior to that as an individual.

E. Paragraph 8, contains frauds as the Case Law defendants allege to show are: (1) not done in good faith per their Oath to the State and our Citizens Rights; (2) proof of them as alleged “superior knowledgeable legal counsel” that did due diligence per the law; (3) a Fraud on the Court that they have relevance in Claims of these Religious Society Victims not the criminals, and as Citizens as Plaintiff’s Complaint and as Judge Crenshaw and Denny IV, states “...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...Hate Crimes...” (4) a Judge Crenshaw written validated “Cause of Action” and agreed also by Charles Denny IV admitted the guilt of his clients and others he attempts to not name by his not filing a proper Notice

of Appearance not letting Plaintiffs as he alleged his former clients these non-sect members know who is paying him as Townsend argued to Judge Crenshaw in 2006 and since but proceeds and Quid Pro Quo seem to come Attorney's Generals, FDLE and State Attorney's acts.

1. The F.S.895, is invoked herein and at F.S.895.05(6) states:

“Any aggrieved person may institute a proceeding under subsection (1), In such proceeding, relief shall be granted in conformity with the principles that govern the granting of injunctive relief from threatened loss or damage in other civil cases, except no showing of special or irreparable damage to the person shall have to be made. Upon the execution of proper bond against damages for an injunction improvidently granted a showing of immediate danger of significant loss or damage, a temporary restraining order and a preliminary injunction may be issued in any such action before a final determination on the merits...”

3. State Attorney nor Mark Ober, Individual, nor his agents, never have the right to “impede” the Religious Society Contract as Bylaws and by Breach of Contract(s) and Torts “illegally” “implant” sheriff deputies supported by irresponsible alleged Legal Counsels, Grant, Gibbs, Denny, Scruggs, Gray, and Others, who billed for alleged honest services they alleged to have provided but evidence shows now proofs of “Bad Faith...Wanton and Willful disregard of human rights...”, “frauds” these services were for the benefit of themselves and the “sect” not the State nor our “non-sect” State Religious Society Citizens Rights acting or trying to act per our State Approved Bylaws as a Contract.

F. Defendant Exhibit “A” contains fraud as it claims the civil action

was received on June 23, 2015, yet the Stamped Complaint was mailed in February 2015, and the Process Server Affidavit shows delivery on 6/24/2015. Additionally this is proof of a State Attorney requesting illegal use of another agency and his own for his personal benefit as an “individual” involved in “Hate Crimes. The August 10, 2006, filed, Complaint, THIRD AMENDED COMPLAINT, in Townsend v. Beck 02-03812 was known to defendants and thus the collusion by Denny, Crenshaw (to recuse herself F.S.38.10) and then the fraudulent backdating of the Order of Dismissal by Judge Barbas claiming Townsend is in violation of now proved and known then Frauds on the Courts by Defendants and not Plaintiffs. And as Defendants have received Federal Briefs and viewed posts on website www.Judgeoneyourself.com of their Malicious Enterprise unlawfully using Plaintiffs proceeds per Rule of Law they are required to not accept but are required to inquire on their origin but violated our Constitution as a Contract and our Laws.

G. Exhibit B, Plaintiff’s allege is fraud and illegal and proof of additional collusion as emails and other evidence to be collected proves collusion inside the Risk Office with other agents that agent Tina Sanatacroce A.S.A. also notarized on Agency Time for Mark Ober, Individual.

H. As another proof of the failures of these Defendants to do their Fiduciary Contract Duty with Citizens as Victims, these Defendant’s here have proved upon themselves their negligent duty and by not doing said

“Duty” continue their Conspired tort to keep Plaintiff’s deprived of our Rights and Assets as until this Exhibit “A”, each state officer, “alias” lawyer, judge, Federal Officer, Deputy, Victims Assistance Agent, Department of Financial Service Agent, Florida Bar, or FDLE or court has acknowledged the multiple certified mail, emails, personal visits and other demands made for them to honor F.S.960 or other forms of full restitution from their agencies for these victims.

WHEREFORE, based on these facts and Matters of Law included herein and in all papers of all cases as Townsend has filed since 1987, which can be supplied to this court these proofs of over 10,000 pages to bombard the Courts of our Claims and knowledge of being “Impeded” to:

“allow Plaintiff to Reveal his knowledge of the “Secret Funds” and other Florida Statute violations by Defendants...and others became co-conspirators and did extort to damage...and unlawfully abduct the children and properties...with “Hate Crimes”.

Emphasis Added. Plaintiffs move that:

- 1. Mark Ober, Individual, be reinstated in Default and an NE EXEAT be immediately issued on all Defendants as named in the FRAP 26.1 Exhibit as Plaintiffs and this State should seek full restitution of any and all monies he or agents has collected during this Malicious Enterprise since 1987; and**
- 2. Mark Ober be prosecuted to the fullest extent of the law;**
- 3. All Defendants be prosecuted to the fullest extent of the law;**
- 4. All others as counselors even herein are prosecuted to the fullest extent of the law for their frauds and Frauds on the Court of Integrity;**
- 5. Plaintiff’s be per a jury trial made whole, reimbursed for our losses,**

and all damages and be rewarded punitive damages per a jury trial.

Respectfully Submitted by:
Randall Townsend, Pro Se and Per F.S.617.0834
P.O. Box 5 or 333 S. Tamiami Trail, #5
Osprey, Florida 34229
941 350-2677
FOR ALL PLAINTIFFS
Jfyrt59@hotmail.com
www.Judgeoneyourself.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was provided this day of 8/11/2015 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; 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 11 DAY OF AUGUST, 2015,

BY ID PRODUCED _____

NOTARY PUBLIC: _____

Respectfully submitted,

Randall C. Townsend, Pro Se and Per F.S.617.0834
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