

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
CHARLES SCRUGGS, INDIVIDUAL AND CHARLES SCRUGGS P.A.'S
MOTION TO DISMISS

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

1. Plaintiff's request this Honorable Court for sake of consolidating these issues and these voluminous case files since 1987, take Judicial Notice of all related cases, and of documents even these created and "impeded" by Defendant Scruggs ET TL (Scruggs) and incorporate them herein as proofs of Plaintiff's "Short and Plain" Claims herein containing defendants Scruggs acts,

"...INTENTIONALLY VIOLATED KEEPING TO THEIR FICUCIARY DUTIES TO ALLOW PLAINTIFF TO REVEAL HIS KNOWLEDGE OF THE "SECRET FUNDS" AND OTHER FLORIDA STATUTE VIOLATIONS BY THE DEFENDANTS..."

as mostly written by Defendants Marva Crenshaw and Attorney Denny IV, May 10, 2006, as alleged honest agent/officers of the court and naming Scruggs ET AL as a co-conspirator per the transcript now submitted in the records of this court for this case as Scruggs claims are “Shotgun” pleading on issues he willfully and knowingly created and or “impeded” to further the Malicious Enterprise against Plaintiffs, his former clients.

2. Since the first meeting in 2000, of Townsend with Charles Scruggs, Individual, representing himself as a responsible Attorney At Law, as Charles Scruggs, P.A. and as a former Hillsborough County Judge with many years of integrity and experience and superior knowledge the representations by these hereafter Scruggs ET AL as Defendants has been a fraud as Scruggs ET AL intentionally and knowingly joined in the Malicious Enterprise against Townsend’s and these Plaintiffs for whom Townsend was elected to speak, to take our proceeds for his Scruggs ET AL and his conspirators benefits over that of his clients.

3. Scruggs ET AL was clearly and accurately informed by Townsend of these complaint issues as told to Attorney Patricia McCarthy and others by Townsend since 11/1987, and the matters arising from her malfeasance and her continuing Torts with her co-conspirators and some still undisclosed.

4. Scruggs ET AL was retained for his services and even insisted even another attorney in his same 419.W. Platt Street building, Jeffery H. Klink P.A. not be retained so Scruggs ET AL could confidently handle all issues and efficiently advise Townsend as a Pro Se in these related cases even

preparing arguments written in claims to the 13th Circuit Court, 2DCA, 5th DCA, 9th Circuit Court, Florida Supreme Court, 11th Circuit Court of Appeals and the U.S. Supreme Court and multiple government agencies that now Scruggs ET AL claims are “shot gun” issues not the tight slug snug case Scruggs ET AL was informed, retained and paid to with alleged “responsible honest services” process for his clients recovery and restitution even from the loss of children.

5. Scruggs ET AL, was by contract retained for his services until September 30, 2003, when Scruggs finally disclosed his intentional frauds and stated, “his personal convictions did not allow him to make a church look bad”, “some day your children will return to you” and that he called the ruling for Townsend ET AL of Malicious Prosecution by Judge Marva Crenshaw after hearing the arguments of Townsend opposing attorney Denny, IV and the other co-participants known to them and still unknown to Plaintiffs herein being part of the “Hate Crimes” and Criminal Malicious Enterprise defendants known and unknown still continue to do to damage these Plaintiffs.

6. Townsend immediately advised the court of Judge Timmerman in Divorce case 02-4974, in a Motion For Reconsideration and advised all of the immediate termination of Scruggs ET AL yet he continues damages.

7. Townsend immediately contacted the co-counsel of Scruggs ET AL for Plaintiffs as Heather Gray ET AL and continued per her alleged Honest legal services for the benefit of all Plaintiffs herein.

8. Scruggs ET AL by this MOTION TO DISMISS is trying to entice this court with extrinsic fraud and “Fraud of the Court” to entering in and continuing the Malicious Enterprise already confirmed against these defendants and others unknown by the U.S. Supreme Court in KELLER v. STATE BAR OF CALIFORNIA 496 U.S.1 (1990) and by THE 1992 AMERICAN BAR ASSOCIATION’S McKAY COMMISSION REPORT addressing and exposing the Malicious Enterprise by Scruggs and his Co-participants known and unknown.

9. Scruggs ET AL with his co-participants know TOWNSEND and those for whom he was elected to speak is still now “Short and Plainly” advocating “His knowledge” as a Whistle Blower trying to recover his and those for whom his speaks abducted kids and proceeds and has legal authority per F.S.617.0834; per MEIER v. JOHNSTON 110 Fla. 374; F.S.120.69(1)(b)(c) Administrative Procedure Act; to reclaim our children and proceeds unlawfully obtained per F.S.817.02 (Obtaining Property by false personation) per F.S.777, Principal; Accessory; Attempt; Solicitation; Conspiracy and other laws as admitted were violated by FSCt Chief Judge Charles Canady, the 11th Circuit Court of Appeals, Federal Judge Moody, Jr., Fifth DCA in ROBINSON affirming Townsends legal positions since the 1987 exposing the criminal acts of LANE/PUBLIX ET AL and McCarthy ET AL and by many proofs now in this case record of admissions by the co-conspirators known and unknown attempting to include this court in their Malicious Enterprise against a Religious Society and Citizens of Florida.

WHEREFORE, Plaintiffs request the Honorable Court to:

- 1. Deny Scruggs ET AL Motion to Dismiss;**
- 2. Issue a NE EXEAT FORM 1.917 for Scruggs ET AL and his co-participants;**
- 3. Find Scruggs ET AL in violations of law and prosecute to the fullest per our Contracts and Laws;**
- 4. Award all possible relief and restitution for Plaintiffs per our Constitutional Rights and contracts;**
- 5. Award Punitive damages for Plaintiffs as allowed per a decision of a Jury;**

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

I hereby certify that a copy of the foregoing was provided this day of August 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; 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 12th DAY OF August, 2015,
BY ID PRODUCED _____**

NOTARY PUBLIC: _____

Respectfully submitted,

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