

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 AND REPLY TO  
DEFENDANT JOHN HARKNESS, Individual, AS SUED  
HEREIN THE SUMMONS SERVED,  
UPON HIM, AS INDIVIDUAL,  
FOR UNLAWFUL MOTION(S)

COMES NOW, Randall Townsend, Individual, and For all Plaintiffs  
and per our Opinions and Beliefs and with verified Facts states:

1. Plaintiff's and Defendants CONTRACT known as The Florida  
Constitution Article I., Section 3., Clearly states:

“...Religious freedom shall not justify practices inconsistent  
with public morals, peace or safety. 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.”

2. ALSO “NO LAW SHALL IMPEDE THE OBLIGATION OF A  
CONTRACT” and Government Officials including Florida Bar Members  
down to the lowest Sheriff Deputy [Jeffers/McDarby] don't think per our

**contract law but believe themselves to be able to illegally by conspired torts implant themselves “Under Color of Law” as “alias” Lawful Officers” as illegal Trustees of a F.S.617 “NOT FOR PROFIT” and illegally steal our money from “Religious Society designated funds” for their own private uses, and as extortion to make their F.S.617.0834, Representative, Superior Officer, “Whistle blower” of and for all “non Sect” Members shut up, and illegally by fraud and extortion 10/1999, abduct minors J.G.T. and J.D.T, from all “assembly” with their father now for over 15 years ignoring “Due Process” of contracts who per the Church ByLaws and State Statues say their acts are “Hate Crimes”, Torts to our Contract(s), and a Malicious Prosecution while they continue their Malicious Enterprise to obtain per RICO illegally gained proceeds as also a crime.**

**3. Then when the chosen properly elected representative Townsend and Others shows proofs of the crimes to these same “alias” law enforcers (Howlett, Jeffers, Corbin and Smoak) as “alias” law enforcers assisted by their co-workers and superior officers and politicians (until discovery is completed alleged to be acting per F.S.16.56 RICO Agents at the service of Defendants and not this Religious Society Tax Paying Citizens) as these “alias” deputies [Jeffers –Howlett through all including as McDarby ET AL] “Superior Officers” [Governors Chiles, Bush, Crist forward to Scott] directing or allowing the F.S. 16.56 RICO TASK FORCE [Gerald Bailey ET. AL. and John Harkness] and lawyers allegedly acting for the Corporation “Not For Profit” [With No Oath protection, Florida Supreme Court Justices**

therefore unlawfully acting despite no “Quorum”, directing their Officers of the Florida Bar and Lawyers and Others and answerable to Citizens and the Florida Legislature per Florida Constitution Article III. Section 17.] acted illegally per our Contracts as the FBCCP Bylaws and Florida and Federal Constitutions use their and practice “Hate Crimes” as confirmed by their lawyer Charles Denny IV and alias “judge” Marva Crenshaw on 5/10/2006 and has others admitted these continuing crimes. This F.S.16.56 Agency and Florida Supreme Court and its “agents” or “arms” is to protect the Citizens of the state and by law cannot not just aid and abet themselves and or “sect agents” violating a Religious Society or any citizen as through McCarthy/Ober/Bondi/Cridlin/Moody ET AL, and or “alias judges” ET. AL they are agents thereof attacking “Whistle Blower” Townsend and those for who he is elected to speak essentially as a Class Action per MEIER.

4. One of the basic facts of this case to be exposed as stated in the Complaint Page 5-6,:

“...violated keeping to their Fiduciary Duties to allow Plaintiff to reveal his knowledge of the “Secret Funds” and other Florida State violations...”

is stated in

“Standard Jury Instructions in Criminal Cases 26.2 Rico-Use or investment of Proceeds from Pattern of Racketeering Activity §895.03(1), FLA. STAT. “Receiving proceeds with criminal intent” means that the defendant, at the time [he][she] received the proceeds, either knew the source of the proceeds or had [his][her] suspicions aroused but deliberately failed to make further inquiry as to the source of the proceeds.”

And Plaintiffs case will show multiple defendants violate this

**Statue and the Officer of Florida Politicians fail to allow Plaintiff(s) Citizens to expose said violations and collusion to fail to prosecute and Plaintiffs desire to recover for our losses exposed with production of Townsends proceeds from Lane/Publix Et AL. and FBCCP/CPCS Et AL. and Others.**

**5. Proof of these “RICO”, “HATE CRIME”, “BREACH OF CONTRACT(S)” and other violations of laws is required through discovery by Citizen Plaintiffs in order to as judge Crenshaw opened the door, prove the elements of the levels and types of Malice and frauds used by the defendants and “Others DOE” as Crenshaw with Denny IV said “that you can go after later” now Defendants and “others” are making a claim of admitting to making false promises in or as proof of the Malicious Enterprise for our “Proceeds” and in 2012, FSCt Chief Judge Charles Canady for himself and the recusal of the Florida Supreme Court and as admitted Plaintiffs proofs in Defendant’s and others “Doe” in “Check Mate”.**

**6. Per R.O.C.P. 1.190 AMENDED AND SUPPLEMENTAL PLEADINGS:  
Section (e) Amendments Generally.**

**“...At every stage of the action the court must disregard any error or defect in the proceedings which does not affect the substantial rights of the parties.”**

**7. In this continuing case since the 1989 Judge Muszynski, Order for the production of Lane ET AL records was by Co-participants, Extrinsic Frauds and Fraud(s) on the Court by in collusion of Attorney’s Chapin, Popper, Williams, McCarthy with Orange County Chairperson Linda Chapin**

and “alias” Honorable judge Rom Powell and “OTHERS DOE” as the 5<sup>th</sup> DCA ROBINSON ruling in Townsend’s Favor showed the FSCt. And its Agents/ARMS involved in the RICO ENTERPRISE back through the 1980” as Townsend alleged in his Briefs and Appeals starting with Judge Powell and the PCA’s and lack of Due Process by these Defendants was without Constitutional Authority but are continued “Breach of Contracts” putting all defendants in estopped Defenses at Law as Plaintiffs believe and allege Bruce and Linda Chapin and Rom Powell and Governor Chiles did enlist John Harkness, FSCt, FDLE, Gerald Bailey, Pat Bean of Hillsborough County and Others in the continued Malicious Enterprise to withhold discovery of Business Records and Legal Rights from Plaintiff’s and defame Townsend and Republicans David Gibbs, III, Jeb Bush, Ken Connor, Gerald Bailey, John Harkness, with Others and John Grant admitting his illegal exparte coaching with “alias” judge Arnold and “others” [Plaintiffs allege and believe, Charlie Crist, Mark Ober, Pam Bondi, 13<sup>th</sup> Circuit judges, 2DCA judges, Charles Canady, FSCt judges, and others] alleging Townsend as a “liar about missing and improper use of designated funds and improper obedience to the FBCCP/CPCS Bylaws etc” and per Grant 3/2/2014, publicly writing “get the mental help you so desperately need...” defendants continue the same patterns of denial of Plaintiff’s Rights or they all could lose their entitlements to the Malicious Enterprise and Lane/Publix Et. Al. Quid Pro Quo RICO Proceeds that every session the Florida Legislature was introducing more legislation to

regulate up to and including this last Governors race platform issue of “slip and fall” insurance cases which is one of a Retail Operations largest detriments to their bottom line.

8. JOHN HARKNESS, Individual, is still as of the writing of this Motion in “Bad Faith” per the SLAPP LAW for continuing his and his co-participants in their Wanton Disregard for the law and Malicious Enterprise, illegally now and still unjustly using his Office for his personal role in the Political Scheme in violation of his Oath of Employment and State of Florida Duties and acts to assist this Malicious Enterprise by use of the I.O.L.T.A. funds and his directions to the F.L.M.I.C..

9. Counsel for John Harkness is acting on or of behalf of their Superiors at the FS Ct. And alias justices and Superior Attorney General Pam Bondi, and “person” also sued in this case as Pam Bondi, Individual, and with her own personal preservation role as she served under Mark Ober, Individual, as A.S.A. until her election to Attorney’s General of Florida.

10. Plaintiffs Claims and Allegations as stated in the “Short and Plain Statement” as written by 13<sup>th</sup> Circuit Judge Marva Crenshaw and Attorney Charles Denny IV, as the alleged honest “officers of the Court” in the related case 02-03812, as continued now in the 15CA1928 Complaint:

A. Page 6, is to prove as stated in pages 5-6,:

“6. 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 by giving their vote of approval for and then by paying for the

**charges to be filed and by being willing to continuing 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..."**

**Plaintiff's in this 15CA1928 for pertinent parts added in ¶6.; "Not for Profit" and Others"...KNOWINGLY, WILLFULLY, AND INTENTIONALLY", the Word "Officers" to "Defendants", "and did extort to damage the character and reputation and unlawfully abducting the children and properties of this Plaintiff".**

**B. Page 8., ¶7.A. added in full to connect Frauds, Malice and Malicious Torts from all Defendants even using and prompting Defendant Harrod to do Batteries, Tax Evasion and Attempted Murder these defendants try to conceal frauds and acts they generated and caused to happen as Damages to Plaintiffs.**

**11. Plaintiffs claim that Defendant Harkness, Individual, in this case must hire private counsel, or himself as an "individual" in violation of F.S.768(9)(a) SLAPP RULE or be arrested based on facts already in evidence and per rule R.O.C.P. NE EXEAT that he has not filed an answer with "Defense at law". Especially if Harkness as the Executive Director of the Florida Bar is supposed to be such trained expert at law but this Pro Se is simply following our Contract(s) with or for their legal Constitutional services, not excuses they use to Breach our Contract for their service for personal "Proceeds" or Quid PRO QUO.**

**12. Take Judicial Notice and include herein all Plaintiffs Pleadings and Motions and Exhibits as proofs against Harkness ET AL.**

**13. Therefore, Plaintiffs respectfully request an Honorable Court to:**

- A. Deny all John Harkness, Individual, Motions;**
- B. Find John Harkness, Individual, in Default and Contempt of Court;**
- C. Find those that attempted a Fraud on the Court as to be his counsel in Contempt and Fraud on the Court;**
- D. Issue an Order per form R.O.C.P. 1.917 for John Harkness, Individual;**
- E. Issue and Order for the arrest of Moody ET. AL. and his co-conspirators for their attempts at additional RICO and Fraud on the Court and initiate process as an officer of the court to have them removed from their offices;**
- F. Order and direct immediately full restitution for all Plaintiffs and Punitive Damages as are just per our Constitutional Rights and Laws to be safe from “undue process” of taking our Proceeds and Rights and including Free assembly with our Children as Plaintiff’s herein have endured these Malicious violations since 1987 as said by our U.S. Supreme Court and even these defendant and others “doe” at various times.**

**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**



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was provided this day of August 6, 2015, by mail 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,

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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 IDENTIFICATION, 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,

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

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