

IN THE DISTRICT COURT OF APPEALS OF
THE STATE OF FLORIDA, SECOND DISTRICT

RANDALL TOWNSEND,)
Individual, and as F.S. §617.0834,)
“Representative” As on behalf of all)
other Corporate members “non sect”)
as the rightful shareholders of The)
First Baptist Church of Citrus Park)
and Citrus Park Christian School)
AND AS “NEXT FRIEND” AND)
PATERNAL PARENT OF MINOR)
SON, J.D.T. and Daughter J.G.T.)
AND AS A DIRECT MEMBERS)
AS (FBCCP) AND)
AS “NEXT FRIEND” AS “DOE”))
AS ALL MINOR CHILDREN)
AND “OTHERS” AS “DOE” OF)
And For Plaintiff THE “NOT FOR)
PROFIT” CORPORATION)
KNOWN AS FIRST BAPTIST)
CHURCH OF CITRUS PARK,))
(FBCCP) AND CITRUS PARK)
CHRISTIAN SCHOOL, INC.)
(CPCS) and as All Members of)
the Citizens “Classes” ET AL)
APPELLANT/Plaintiffs)
v. HEATHER M. GRAY, Individually, HEATHER M. GRAY,
ATTORNEY AT LAW, HEATHER M. GRAY, P.A. A FLORIDA
CORPORATION, ET.AL.) AS
APPELLEE/Defendants. /

2DCA APPEAL: 10-774

CIVIL ACTION COMPLAINT
CASE NO: _ CASE NO: 06-6005

INJUNCTIVE RELIEF SOUGHT

CLAIM FOR CLASS ACTION

JURY TRIAL DEMANDED

ON REVIEW FROM THE HILLSBOROUGH COUNTY
CIRCUIT COURT OF MARTHA J. COOK, TAMPA, FLORIDA

APPELLANT’S REPLY BRIEF

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ARGUMENT

No reply by Defendants and specifically Heather Gray et al says volumes more than had she or any defendant tried to respond to a specific issue of the entire conspiracy. Now even all Fla. Bar agents abandon reply.

This 2DCA even in the prior lower cases included connected defendants (Denny) in responses who now herein made no answer to their connection to these claims despite their knowledge thereof.

Was judge Merryday sending a message when he wrote (2007) that Townsend Et Al only needed to sue just a few men as he understood the “Government Officers” (Jeb Bush, Charlie Crist, John Harkness, John Berry, Bruce Chapin, Mark Ober, David Gee, Gary Terry, Marva Crenshaw, Heather Gray and other(s) Et Al) conspiracy in this case as it related to other patterns he saw and ignored in i.e.--Example Aisenberg as a case when “Government” need to by “Rico” and “Hate Crime” methods conceal their faults of law just like this case now connected and consolidated before this court. No legal document allows defendants to impede or “interfere with child custody” or assembly or refusal to produce Church discovery as has been done in this case so defendants can do extortion, obstruction of witnesses, bribery, and conceal multiple frauds to plaintiffs depriving them of our Contract and Constitutional Rights.

Actually the Hillsborough Board of County Commissioners, State Officials or Courts do not have any Constitutional or Contract Right to deny “citizens” pure and unimpeded exposure of all “discovery” of these claims connected to their actions with the co-participant now former Hillsborough County Former Administrator Pat Bean. The Florida Sunshine Law required exposure to citizens.

Clearly, Federal Judge James Moody Jr. did when on 03/15/2007, he told me, sick-em and prove jurisdiction, prove allegations per each, and prove a Federal Cause on each in your Amended Complaint. Then this 977 page Amended Complaint is dismissed by Judge Merryday as too lengthy because judge Moody Jr. was “too connected” with the 13th Circuit Court judges and therefore honorably recused himself for fear of prejudice when this case finally got a trial before the people.

“We the people” are still waiting.

This is the pattern of these “Government Officers” concealing that Randall Townsend called “9-11” to “Law Enforcers” to report that in:

- 1987 Townsend’s temporary business partner was doing drugs and then it turns out the ex-partners lawyer was also a drug partner!

When the Townsend lawyers (Popper/Chapin) did malpractice, of not doing discovery and caught themselves tricked by the

defendants lawyers lies to cover up their friendship since junior high school and drug uses they turned on their own client to make Townsend the liar!

This fraud caused loss of reputation, career, business and leads to the loss of trust in the marriage and relationship with the Townsend children and gives defendants motives and leverage to use for their political election frauds.

That pattern continues today as each defendant continues “false public light” and “uttering false reports” to attack anything Townsend says or just refuses to answer the question. Or courts use the fraud of “per curium affirmed”.

- 1995 Townsend per his many duties as FBCCP leader per the By-Laws answers the “9-11” call of fellow members and turns to “Law Enforcers and Lawyers and judges and politicians” who turn out to make a diversion to their crimes by “uttering false reports” (too many to count even despite their blocking discovery and doing “Violations of Equal Due Process to Townsend a 3+ time respondent) and “putting Townsend in a false public light” being betrayed by even his own counsels intentional deceptions;
- 1999 Randall Townsend alerted “officers” and “officials” of the

criminal acts and as acts then of violations of the FBCCP and CPCS By-Laws and contracts being done by Karen Harrod Townsend. “Officers” to limit their contribution and participation in these illegal acts continue to conceal any proofs Randall Townsend shows per his duty as the FBCCP Nomination Supreme Court Committee member in 1999. Defendants by frauds deny the FBCCP By-Laws process to remove Townsend off the committee.

- Randall Townsend has been denied by “under color of law” frauds and “false public light” the 1st Amendment rights of Assembly and Speaking in his church, courts, county commissioners meetings and public forums to re-address the “suppression of government” impeding done by first Townsends attorneys David Popper, Bruce Chapin, David Gibbs, John Grant, Charles Scruggs, Heather Gray as each uses the frauds done by Deputy Jeffers, Howlett, Smoak and others to impede.

Honest Abe Lincoln per his convictions and honor to duty said:

“If you once forfeit the confidence of your fellow citizens, you can never regain their respect and esteem. It is true that you may fool all the people some of the time; you can even fool some of the people all the time; but you can’t fool all the people all the time.”

“Stand with anybody that stands right. Stand with him while he is right, and part with him when he goes wrong.”

“Gold is good in its place, but living, brave, patriotic men are better than gold.”

“Let every man remember that to violate the law is to trample on the blood of his father, and to tear the charter of his own and his children’s liberty.”

“I believe it is an established maxim in morals that he who makes an assertion without knowing whether it is true or false is guilty of falsehood, and the accidental truth of the assertion does not justify or excuse him.”

“It is as much the duty of government to render prompt justice against itself, in favor of citizens, as it is to administer the same between private individuals.”

Violations of the FBCCP By-Laws gives “Benefit to Clergy” and continues the pattern of all defendants greed and lack of morals to “take the money and run” and forget the Constitutional and Contract Obligations you may owe per your duties to same. Emphasis Added. Non member “Law Enforcers” Giving “Benefit to Clergy” is a violation of the By-Laws and “Florida Criminal Code in F.S.775.03, and has concealed frauds to the By-Laws voting members since about 10/1995 or before by the “sect” which includes and is driven by “government law enforcers” non-members.

Yes knowing what conspiracy the “RICO GANG” of Bush, Crist, Chapin, Popper and others were able to do to violate me and my family and the Constitution, I as a father became more driven to find a Church Contract By-Laws that spelt out specific rules to protect my family. I returned back

to the safety of the Church of my youth that was started by my Uncle back in the 1940's and poured my heart and soul into making these a safe haven for my kids. The FBCCP members knew my integrity and reputation and by their 1993-1999 voted expected me to take on protection of their "Quest".

To show how "Odious and Outrageous" the defamation and Malicious prosecution of Townsend and those "naïve" for whom he speaks by the full "Gang" goes to the Mens Rea Motives and conspiracy by the defendants now listed and "others Doe" yet to be named.

The fact that these connected co-participant defendants go to the extreme of threats still over 22+ years later to keep me from my kids and my Church kids shows just how vile and hypocritical each defendant is to their Constitutional Oath and therefore per the U.S. Constitution "Bad Behavior" or the ethics of the FBCCP By-Laws their violate.

Recent events show the "RICO" Criminal Enterprise is still ongoing by those in Breach of their Oaths to their Constitutional or elected or appointed Duty of Office.

Just this week television news reporters state that the Hillsborough County Commissioners are going to not terminate their County Attorney Renee Lee because they may need her to testify about the facts of the termination of County Administrator Pat Bean. In criminal terms this is

“bribing” and “tampering with a witness” and are we to allow this of an elected official to clearly show the prejudice and bias of this bribe so clearly before the eyes of the citizens they are to represent and protect.

We are paying them for “pure water” not their all things are their “cool-aid”!

This “sham to scam” pattern is the same acts that Pat Bean Et Al have done connected to her Administrative powers to require no actions by HCSO, State Attorney Ober, 13th Circuit Judges, the BOCC or Townsend’s Et Al ‘s own attorneys to acts to expose and remove deputies Howlett and Smoak or allow the FBCCP members to remove these violators of the FBCCP By-Laws. Even the FDLE admits connections from the first time agent Cindy Sanz was notified in the letter (2004) still contained in their files of this matter.

Report of all types of facts of the criminal components have been produced in the conspired actions of these defendant that Heather Gray Et al was paid and agreed to litigate to write in the Appeal in 2004 and further agreed to do in her March 2004 (Divorce case 02-4974) commitment to the Court of Judge Gomez. At the same time she was conspiring and doing fraud to her clients she was seeking delays with this 2DCA that ended up causing this 2DCA to deny hearing any claims. As a point of fact, the 02-

4974 filing of an Appeal was timely done by Randall Townsend not knowing at the time that Heather Gray and Charles Scruggs were intentionally plotting with Judge Timmerman and the former wife's Attorney Stacey Turmel to miss the Appeal Filing deadline while they did now proved multiple drafts to cause further damages to this Respondent Father and his children. The Gray et al conspirators even took further actions to add in the Divorce Order and Injunction of 2003 that contained issues never debated (sell of the home, garnishments, visitation) before Scruggs was even terminated on September 30, 2003. At the time of the December 2003, conspired Order of judge Timmerman both children were over 18 and therefore the court has no authority to issue the non contact with the children that defendants conspire to enforce even through the March 2010 visit by HCSO deputies "Threats" to stop trying to contact your children and stop trying to litigate these issues. Emphasis Added.

Public records show multiple conflicts of bias and prejudice and frauds by each judge connected in this case but they refuse to recuse themselves prior to their dishonorable conspiracy to suppress Constitutional Rights. Only Federal Judge Moody to this plaintiff's knowledge did not knowingly violate the law but recused himself because of his knowledge of the frauds of his fellow "bad behavior" justices.

CONCLUSION

How many years then will this court continue to allow proved criminals stay in co-participant criminal detainment of this parent child relationships (all adults) as extortion to conceal not proving further criminal acts of the co participants criminal enterprises as proved as the strategy by the same participants of HCSO et al done in Aisenberg in November 1999, as HCSO did to defame Townsend since 09/08/1999, because Townsend in his Church/School as a Supreme Court of the Corporation Not for Profit said, “Show me the money” as yet has to be done and “Stop the building scheme frauds” as the property at 18105 N. Gunn Highway is now up for sale and developed with bank fraud and fraud with the FBCCP members money and the FBCCP and Plaintiffs Et al have incurred deprivations too many not yet even exposed as caused by all defendants listed in this litigation’s and others yet listed as “Doe”. Is this Court going to be a “Doe Participant” continuing the prosecutions and deprivations of Plaintiffs or a lawful Constitutional and Contractual Citizen in obedience to the law? Time and facts prove Randall Townsend as for himself and as the voice of the people when allowed to vote right per the law and our Constitutions.

CERTIFICATE OF FONT COMPLIANCE

I hereby certify that Times Roman Numeral 14 Point was used per the requirements of Florida Rules of Appellate Procedure 9.210(a)(2).

Respectfully submitted,

Randall C. Townsend, Pro Se
FOR ALL APPELLANTS/
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By: _____

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ON: _____

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Certificate of Service

I hereby certify that a copy of the foregoing was provided by U.S.
Mail this _____ day of _____ 2010, to the clerk of the 2 DCA at
1005 East Memorial Blvd. Lakeland, Florida 33801 and Heather Gray et al
at 10011 Cannon Dr. Riverview, Florida 33578.

Randall C. Townsend, PRO SE.