

IN THE CIRCUIT COURT  
CIRCUIT, IN AND FOR  
HILLSBOROUGH COUNTY, FLORIDA

CASE NO. \_\_\_02-03812

RANDALL TOWNSEND,  
PLAINTIFF,

v.

RONALD L. BECK, (a.k.a Ron Beck)  
INDIVIDUALLY,  
REVERAND RONALD L. BECK,  
AS SENIOR PASTOR, OF  
FIRST BAPTIST CHURCH OF CITRUS PARK, (Hereinafter as FBCCP)  
WILLIAM T. BROWN, (a.k.a Bill Brown)  
INDIVIDUALLY,  
REVERAND WILLIAM T. BROWN, OF FBCCP  
AS PASTOR OF EDUCATION AND ADMINISTRATION  
HERMAN MEISTER,  
INDIVIDUALLY,  
REVERAND HERMAN MEISTER,  
AS PASTOR OF SCHOOL MINISTRIES, OF FBCCP  
GARY LEATHERMAN,  
INDIVIDUALLY,  
GARY LEATHERMAN,  
AS TRUSTEE AND MEMBER OF FINANCE COMMITTEE AND  
MEMBER OF PERSONNEL COMMITTEE, OF FBCCP  
ROBERT GILES,  
INDIVIDUALLY,  
ROBERT GILES,  
AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP  
TIM JEFFERS,  
INDIVIDUALLY,  
TIM JEFFERS,  
AS FINANCE COMMITTEE MEMBER,  
MARK NUNES,  
INDIVIDUALLY,  
MARK NUNES,  
AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP  
MIKE SHUMATE,  
INDIVIDUALLY,  
MIKE SHUMANTE,  
AS CHAIRMAN OF DEACONS, 2000-2001. OF FBCCP  
JOE HOWLETT,  
INDIVIDUALLY,

JOE HOWLETT,  
AS TRUSTEE, OF FBCCP  
GEOFF SMITH,  
INDIVIDUALLY,  
GEOFF SMITH,  
AS CORPORATION PRESIDENT, AS TRUSTEE, AS DEACON OF FBCCP  
DR. LON LYNN,  
INDIVIDUALLY,  
DR. LON LYNN,  
AS A PROFESSIONAL MEDICAL DOCTOR,  
THE MEMBERS OF THE CORPORATION d/b/a,  
FIRST BAPTIST CHURCH OF CITRUS PARK,  
CITRUS PARK CHRISTIAN SCHOOL,  
A MINISTRY OF FBCCP,  
AS DEFENDANTS,

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**PLAINTIFF'S VERIFIED OBJECTION TO**  
**DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT**

Comes Now, Randall Townsend, Pro Se, and files **PLAINTIFF'S VERIFIED**  
**OBJECTION TO DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT** and  
states:

1. This Plaintiff has been denied due process and discovery of frauds against him as this Defendant/Respondent turned Plaintiff has tried to REDRESS THE MALICIOUS PROSECUTION FRAUD ALLEGATION ACTIONS FILED BY MALICIOUS MOTIVES OF THESE DEFENDANTS AS INDIVIDUALS AND AS A NOT FOR PROFIT CORPORATION AS A CHURCH OF MEMBERS AT LARGE AND AS INDIVIDUAL MEMBERS OF THIS ORGANIZATION TRYING TO KEEP THEIR CRIMINAL ACTS UNCOVERED AND THEN OF THEIR OWN FREE WILL THESE PEOPLE CHOSE TO ATTACK THIS DEFENDANT/RESPONDENT IN

THE COURT OF JUDGE PALOMINO RATHER THAN EXPOSE THE PASTOR(S) AND SELECT FINANCE COMMITTEE MEMBERS AND TRUSTEES AS CORPORATION OFFICERS AND THEMSELVES FOR THEIR ACTIONS OF CRIMINAL VIOLATIONS OF THE FLORIDA STATUES EVEN AFTER THEY ASKED THIS DEFENDANT/RESPONDENT TURNED PLAINTIFF TO HELP THEM BE “PURE AS THE DRIVEN SNOW” : (a) IN THEIR BUILDING EXPANSION PROGRAM AND (b) “FIND THE MONEY” THESE PASTORS AND FINANCE MEMBERS WERE HIDING FOR SEVERAL YEARS AND (c) Inform them how to stay ethically “as pure as the driven snow” as stated in the Business Meeting minutes per exhibits previously shown to this court and THIS NOW DEFENDANT/RESPONDENT BECAUSE OF THEIR RETALIATIONS TO TRUTH FOUND BY THIS MEMBER/DEFENDANT/RESPONDENT TURNED PLAINTIFF HAS TRIED TO: (1) DEFEND HIS ASSAULTED REPUTATION TO HIS FAMILY, WIFE, PARENTS, CHILDREN, FRIENDS AND OTHER CORPORATION MEMBERS WHEN THESE CORPORATION OFFICERS AND SELECT MEMBERS (including sheriff deputies) HEARD TRUTH THEY DID NOT WANT TO HEAR OF THEIR CRIMINAL ACTS AND FEARED (a) Loosing their jobs and (b) BEING CRIMINALLY CHARGED FOR THEIR CRIMINAL ACTS AND HATE CRIMES DONE ON CHURCH/SCHOOL PROPERTY AND OFF CHURCH/SCHOOL PROPERTY AT PUBLIC PLACES VIOLATING PLAINTIFF’S CHILDREN AND THIS DEFENDANT/RESPONDENT EVEN INCLUDING HIS PLACE OF EMPLOYMENT AND

(2) THEN TO SEPARATE COURTS PROVE TO ALL THESE COURTS ALL MATTERS NECESSARY TO STOP THE CONTINUING RETALIATION FRAUDS AND HATE CRIMES DONE ON CHURCH/SCHOOL PROPERTY AND OFF CHURCH/SCHOOL PROPERTY IN MALLS, PUBLIC STREETS, POST OFFICE AND OTHER PLACES, AND IN THE COURTS STARTED BY THESE CRIMINAL OFFICERS, AND TOLD TO OTHER NAÏVE CHURCH MEMBERS WHO ALSO DO VILE ACTS ON AND OFF CHURCH/SCHOOL PROPERTY AND THEN TOLD TO JUDGE PALOMINO AS THESE DEFENDANTS MADE FALSE ALLEGATIONS IN AFFIDAVITS AND HAD THIS AFFIDAVIT NOTARIZED BY PAULA POWELL, THE CHURCH FINANCE SECRETARY WITH HER FULLY KNOWING HER NOTARY ACTIONS WERE PROMOTING A FRAUD TO COVER FOR HER MISREPRESENTATIONS OF THE CORPORATION FINANCIAL BOOKS AND KNOWING HER SENIOR PASTOR WAS LYING IN HIS AFFIDAVIT TO INDUCE AN INJUNCTION FROM NOVEMBER 2, -15, 2001 AND THEN USING THESE AFFIDAVITS AND CONSPIRED TESTIMONY FROM OTHER CORPORATION EMPLOYEES AND MEMBERS GET THIS INJUNCTION EXTENDED AND ENLARGED AND THEN THESE SAME FRIVILOUS CHARGES WERE USED TO GET ANOTHER INJUNCTION FROM 2003 TO CURRENT BY FRAUD TO JUDGE TIMMERMAN AND THEN THESE SAME DEFENDANTS USED FRAUD ALLEGED ABOUT THE JUDGE PALOMINO RULING AS PROVED TO BE IN CONTRAST TO THE TRANSCRIPTS OF THE TESTIMONY IN THE COURT OF JUDGE PALOMINO ON NOVEMBER 15, 2001, AND TOLD FRAUDS (that Plaintiff was “dangerous” “a Liar” “stalking for no reasons”) TO OTHERS IN THE PUBLIC

AND OTHERS AS CHURCH MEMBERS AND TO ATTORNEYS AND TO NEW JUDGES INCLUDING JUDGE TIMMERMAN, JUDGE GOMEZ AND JUDGE SIERRA AND THIS COURT and has incurred additional lawyers fees and legal expenses and damages including additional pain and suffering and emotional duress due to these injunctions being filed against this Plaintiff prohibiting this father from seeing his children due to the continued violations of the Rules of Civil Process by these defendants and their attorneys ignoring their clients prior and continuing frauds AND HELPING THESE CLIENTS AVOID EXPOSURE OF FACTS FOR TO AVOID CRIMINAL PROSECUTION BY these requests for production of documents:

- a. April 25, 2002, Plaintiff's, COMPLAINT alleged violations of Florida Statues 607.1620(1) and other Statue violations and in Count EIGHT point 47, "Plaintiff prays for Court Ordered support of all discovery of all documents, financial and Business Meeting Minutes being hid by the Defendants as Officers of the Corporation and needed to prove Plaintiffs issues for this Court."
- b. December 18, 2002, Plaintiff's **MOTION FOR PRODUCTION OF DOCUMENTS**, contained multiple proofs with partial exhibits of needed Discovery of documents to support all matters for this court
- c. July 2, 2003, **Amended Complaint** again alleges violations of 607.1620(1) and other financial issues as violations of the Florida Statues and specifically at point 10 (4), states "evidence in the Church Business Meeting Minutes verses previous reports..." and at "(7) evidence that this lawsuit is required in order for Ronald L. Beck to be made to be forever stopped from his continuing tort actions that continue to be instigated to forever discredit this Plaintiff and harm Plaintiff's family and thus

provides as proofs Ronald L. Beck's attempted misrepresentations, Breach of Contract, Breach of Duty and Frauds and violations of **FBCCP 'BY-LAW'S'** and State of Florida Laws and Statues when Ron Beck, individually, was/is attempting to FRAUD this Plaintiff, the Membership and individuals such as Plaintiff's wife and minor Children, **and was and still willfully misusing his role as PASTOR/Counselor, Senior Pastor and "Chief Executive Officer" of the FBCCP Corporation and School Ministry to keep his misrepresentation, insubordination to Florida Statues, codes and laws and frauds from being Exposed by Plaintiff conducting his duty to the State of Florida and the FBCCP Corporation members and Plaintiff's own family..."** and at other multiple points and statements therein did alert this court that discovery of many records was necessary to prove the knowledge of all persons needed to be exposed to show this court that they must be included as cooperating with Defendant Beck as his Co- Defendants as he did his role per his own testimony per even the transcript submitted to this court as pastor **in order to attempt to fraud Judge Palomino to grant an injuntion against this Plaintiff** and enlightened so as to stop all abuses on this Plaintiff for him to clear his reputation from the MALICIOUS PROSECUTION that Ronald L. Beck individually and as the SENIOR PASTOR did even as the frauds he and his employee told Judge Palomino in the CASE NO 01-15813 and 01-15814 and has continued to damage this Plaintiff and has yet to stop his abuse or repair the damages from his frauds and actions **BEGAN IN 1995 TO DAMAGE THIS FATHERS DUTIES TO THE OFFICER POSITIONS IN THE CHURCH AND RIGHTS TO HIS WIFE AND**

**CHILDREN AND WHICH NOW STILL CONTINUES that Plaintiff has not because of an Injunction done by Judge Timmerman in 2003 who listened to the one sided story of frauds presented by Attorney Turmel and the accomplice of Ron Beck the now former wife as she to Judge Timmerman confirmed the conspiracy and alleged by Ron Beck and his CO- DEFENDANTS used the allegations of Ron Beck and others to grant this injunction which now has kept this Plaintiff from being a father to his children and even now not seeing his children now (since November 2002) for over three years due to the frauds this court will not let this Plaintiff get discovery on so to clear this Plaintiff's reputation and get the injunction reversed based on that it was always a fraud to cover for the bank records that shows the corruptions by Ron Beck and others on the finance committee and trustees who mis used their roles also as Sheriff Deputies to cover up their assisting this alleged Pastor from hiding corporate funds from the stock holders! This court has only allowed the abuse to continue against this Plaintiff by the Defendant Ron Beck and his CO-DEFENDANTS and the attorneys continuing to lie and fraud to keep these discovery of the true records necessary to clear the reputation of this Plaintiff.**

- d. October 9, 2003, Plaintiff filed a **SUPPORTING MEMORANDUM OF LAW AND MOTION FOR REHEARING**, and again presented sufficient evidence that discovery of all requested documents was legally necessary for this plaintiff to defend himself from the Malicious prosecution and redress the frauds stated by Ron Beck as an individual and as an alleged “pastor” of a church membership as a corporation with duties bound to this member per the Florida Statues as a stockholder with rights

to see and even get the assistance of the courts to produce the company business records.

- e. December 8, 2003, Plaintiff filed a **SUBPOENA DUCES TECUM FOR TRIAL**, TO RON BECK AS AGAIN ANOTHER ATTEMPT TO SECURE FOR PRODUCTION TO THIS COURT ALL NECESSARY DOCUMENTS THAT WILL ALLOW THIS PLAINTIFF TO DEFEND HIS RIGHTS TO REBUKE THE CHARGES MADE BY DEFENDANT BECK TO JUDGE PALOMINO AND TO THIS COURT (as the records will expose the “odious and outrageous” extreme intent to cover up an “odious and outrageous” extreme amount of frauds and corruption and hate crimes done by all these defendants) AND TO STOP THE MULTIPLE DAMAGES DONE BY BECK and HIS EMPLOYEES WHICH LED TO THE FRAUDS PRESENTED TO JUDGE TIMMERMAN, JUDGE GOMEZ and JUDGE SIERRA AND FRAUDS TO THIS COURT PER THE WRITINGS AND WORDS OF ATTORNEY DENNY.
- f. March 23, 2004, Plaintiff filed, **PLAINTIFF’S RESPONSE TO DEFENDANTS MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS AND PLAINTIFF’S AFFIRMATIVE DEFENSES AND PLAINTIFF’S REQUEST FOR SANCTIONS**, AND AGAIN ATTEMPTED THAT PLAINTIFF BE HEARD ON THESE ISSUES PRESENTED THEREIN.
- g. APRIL 19, 2004, as directed by this court Plaintiff timely filed his **SECOND AMENDED CIVIL ACTION FOR DAMAGES COMPLAINT AND DEMAND FOR JURY TRIAL** and again in multiple uses of studied and approved case language has clearly outlined the elements of these causes of actions with multiple



necessary exhibits to show cause and the damages being done by these multiple defendants and seeks this courts approval of this case EVEN NOW JUST UNDER THE COURT ALLOWED TO REDRESS THE MALICIOUS PROSECUTION AND TO SHOW JUST HOW “WITH MALICE” AND “ODIOUS AND OUTRAGEOUS” THE CONDUCT HAS BEEN BY ALL DEFENDANTS AS THEY SUPPORTED AND ENCOURAGED THE ACTION TO JUDGE PALOMINO AND THEN TO JUDGE TIMMERMAN AS by these multiple defendants as co defendants as they helped and continue to help RON BECK, cover up his original acts, continue his frauds and crimes and to start new crimes to assist their cover up of their frauds and crimes and allow them to do more crimes against this Plaintiff while their attorneys continues frauds and trickery on the courts to get injunctions, block discovery and cause outrageous financial stress on this defendant/respondent now Plaintiff so to suppress release of all the hate crimes done to this man they originally asked to help them as stated above herein.

- h. July 8, 2004, Plaintiff filed and attempted to be heard on **PLAINTIFF’S MOTION FOR CONTEMPT OF COURT ON DEFENDANTS AND DEFENDANTS COUNSEL AND MOTION FOR SANCTIONS AND MOTION REQUESTING LEAVE OF COURT COMPELING DEFENDANTS TO ANSWER ADDITIONAL INTERROGATORIES AND MOTION FOR PRODUCTION OF DOCUMENTS,** with attachments of the transcripts of the hearing before JUDGE PALOMINO for case number 01-15813 as RONALD BECK v RANDY TOWNSEND and for case number 01-15814 as KAREN TOWNSEND v RANDY TOWNSEND and for case number 02-4974 as KAREN HARROD TOWNSEND v

RANDALL C. TOWNSEND, for this court first hand to read how these defendants have and continue to misrepresent facts and even lie to these courts and to prove that only the true productions of all documents requested by this Plaintiff will vindicate this Plaintiff from all the frauds that have been told even to judges while these defendants were under oath and then with the total intention to take that testimony and then misrepresent the alleged court orders and courts words in the transcripts as these defendants will say what ever is necessary at the time to continue their frauds and lies and even then misrepresent the alleged words of a JUDGE to another JUDGE as the records show has been done multiple times!

AND THEN THESE DEFENDANTS WILL EVEN LIE TO THE CHILDREN OF THIS PLAINTIFF AND CONTINUE TO MENTALLY, EMOTIONALLY AND PHYSICALLY HARM THESE CHILDREN AND WITH THESE ATTEMPTS AT INJUNCTIONS AND THEN THE INJUNCTION GAINED BY FRAUD TO JUDGE TIMMERMAN CONTINUE TO KEEP THIS FATHER FROM HIS CHILDREN NOR ALLOW HIM TO GET THEM MEDICAL AND EMOTIONAL COUNSELING AS SHOULD BE ORDERED BY A COURT PER THE FLORIDA STATUES PRIOR TO A DIVORCE BEING GRANTED BUT AGAIN THE COURTS IGNORED THE LAW!

THIS COURT NOW WITH THE TRANSCRIPTS AND WITH THE EVIDENCE ATTACHED TO THE AMENDED COMPLAINT CAN NOW FULLY UNDERSTAND THAT THE INTORRAGATORY ANSWERS GIVEN BY DEFENDANT BECK ARE “NON RESPONSIVE” AND HIS ANSWERS WILL LEAD TO RELEVANT INFORMATION BUT ALLEGED “pastor” RON BECK ATTORNEYS CONTINUES TO FRAUD THIS COURT SAYING

DISCOVERY IS IRRELEVANT HOWEVER THE DOCUMENTS  
PRESENTED AND THE RULING OF THE PELLEGRINI V. WINTER 476  
S.O. 2d 1363 (Fla. 5<sup>th</sup> DCA) showing collaboration of defendants AND PER  
THIS CASE THIS DEFENDANT/RESPONDENT/ NOW PLAINTIFF  
SHOULD BE ALLOWED TO COUNTER SUE ANY PERSON WHO HAS  
VIOLATED HIS RIGHTS AS REDRESS TO THEIR LAWSUIT AGAINST  
THIS PLAINTIFF PRO SE AS EVEN SAID BY JUDGE PALOMINO IN  
HIS NOVEMBER 15, 2001, RULING TO COUNTER THE SLANDER  
STATEMENTS AND HE DID NOT CAUTION THAT ALLEGED FIRST  
AMENDMENT ENTANGLEMENT OF A CHURCH PASTOR BEING  
ABLE TO SLANDER AND FRAUD AT WILL TO A GOOD CHURCH  
MEMBER TO DISCREDIT AND HARM HIS REPUTATION ALLOWED  
BECK TO LIE TO THE COURTS AND OTHERS AT WILL SO THE  
SLANDER COULD EVADE PROSECUTION FOR OTHER CRIMES!

Mr. Beck intentionally misrepresents the alleged letter “removing my  
membership posthaste” as it was written by pastors at IDLEWILD  
BAPTIST to get Beck to stop abusing my family and it was Beck’s intent to  
deceive that if my membership was removed then he could not allow me to  
vote or speak in CHURCH BUSINESS MEETINGS as he also infers I came  
to church religious services to disrupt but that was never done. I came to the  
Church Business meetings as I WAS INVITED BY OTHER MEMBERS TO  
DO SO THEY COULD ASK QUESTIONS WITH ALL PERSONS  
PRESENT SO THEY COULD GET THE TRUTH! THEN THE LETTERS

**BECK STATED HE HAD WERE SENT TO PEOPLE TO ANSWER THEIR QUESTIONS. HOWEVER LATER THESE PEOPLE STILL THEN OF FREE WILL CHOOSING TO IGNORE THE CRIMES OF BECK AND MEISTER AND OTHER OFFICERS THEN DID VOTE TO ALLOW BECK TO REPRESENT THEM TO FILING FOR THE INJUNCTION SO THIS COULD BURY THEIR PAST HATE CRIMES BY KILLING THE MESSENGER!**

**Mr. Denny's positions call Judge Palomino a liar!**

THIS COURT NOW WITH THE TRANSCRIPT OF THE HEARING BEFORE JUDGE PALOMINO OF TESTIMONY GIVEN BY RONALD BECK AND KAREN TOWNSEND AND THEN THE RULING BY JUDGE PALOMINO SHOW THAT THE TESTIMONY TO THIS COURT BY ATTORNEY DENNY IN VERBAL STATEMENTS AND IN HIS FIRST AFFIRMATIVE DEFENSES THAT ALLEGE PLAINTIFF IS VIOLENT AND THAT JUDGE PALOMINO SAID CRIMINAL CHARGES WOULD BE THEIR NEXT REQUIRED STEPS WERE A PURE FRAUD TO THIS COURT AND CONFIRMS FRAUDS MADE TO MULTIPLE CITIZENS AND INCLUDING THESE BECKS CO DEFENDANTS WHICH CAUSED MULTIPLE ADDITIONAL ACTS OF CRIMINAL VIOLATIONS AND HATE CRIMES AGAINST THIS PLAINTIFF!

- i. July 25, 2004, Plaintiff filed and attempted to be heard on Plaintiff's **MOTION FOR SANCTIONS AND MOTION FOR PRODUCTION OF DOCUMENTS.**
- j. August 9, 2005, Plaintiff complied with this Courts Order and paid the \$924.00 plus \$1.00, sanctioned against this Plaintiff because the production of documents

requested many times as above herein has proved Plaintiff could not answer each question more truthfully or more complete as this Plaintiff could because the production of documents owed to this Plaintiff had not been done so Plaintiff could give full complete answers or later be entrapped to have lied.

\*\* Attorney Denny has already filed with this Court the transcript of the hearing before Judge Crenshaw on March 31, 2004.

2. Also attached for the true record of this case are the transcripts of the hearings before this court of Judge Crenshaw of:

a. HEARING ON December 15, 2003—While this court was blocking Plaintiff's well stated legal attempts to gain information that proved the frauds and conspiracy of the pastor and the church members, these same admitted by themselves co conspirators in testimony to Judge Timmerman were still practicing criminal activities against plaintiff pro se and others **THAT SAME DAY OF DECEMBER 2003, DOING EXPARTE ACTS AND INTENTIONALLY HIDING EVIDENCE OF THEIR CONSPIRACY USING JUDGEMENTS AND AMENDED JUDGEMENTS CONTAINING INJUNCTIONS AGAINST Plaintiff pro se TO SEE MY KIDS AND GARNISHMENTS WITH THE HELP OF OTHER ATTORNEYS AND WITH JUDGE TIMMERMAN** and also this plaintiff even for the court predicted that these damages already started and continuing and would increase against this DEFENDANT TURNED PLAINTIFF would continue and do more damage, this plaintiff was being lied to and lied about and having in the court of Judge Timmerman many frauds being done by these same alleged church pastors and

church members in continuing their frauds with the help of their lawyers and Judge Timmerman was signing MULTIPLE JUDGEMENTS DONE EXPARTE EVEN AFTER PLAINTIFF HAD TURNED PRO SE AND HAD FIRED HIS ALLEGED ATTORNEY ALLEGEDLY WORKING FOR HIM BUT WAS PROTECTING HIS PERSONAL BELIEFS OF AS STATED TO HIS CLIENT IN SEPTEMBER 2003 “HE DID NOT WANT TO MAKE A CHURCH LOOK BAD” and thus these actions sacrificed the rights of his client, CHARLES SCRUGGS BUT HAD TURNED INTO PLAINTIFF’S ENEMY AS HE TURNED AGAINST ME TO PROTECT HIS MALPRACTICE DONE IN THE COURTROOM OF JUDGE PALOMINO ON NOVEMBER 15, 2001 AND IN THE COURTROOM OF JUDGE TIMMERMAN ON JANUARY 30, 2003 AND MALPRACTICE DONE AFTER HE WAS ALERTED FROM TESTIMONY GIVEN BY BECK HIMSELF AND BY THE ESTRANGED FORMER WIFE AN EMPLOYEE OF BECK FROM BEING EXPOSED. While this court does not want to be allegedly “entangled in church matters” members of the church and attorneys are freely in this court system getting their deceptions and frauds through the court and this Plaintiff is NEVER GIVEN A RIGHT TO DEFEND HIMSELF FROM THE LIES A CHURCH AND MEMBERS CHOSE TO COME TO COURT AND MAKE TO JUDGES WHO ARE NOT ABLE TO EVER HEAR REBUTTAL DEFENSE TO THE LIES OF THE CHURCH MEMBERS AND PASTORS AND ATTORNEYS! WHILE THE COURTS LETS ATTORNEYS LIE AND CREATE ADDITIONAL FRAUDS THE CHURCH MEMBERS IN OTHER COURTS FREELY LIE AND FRAUD AND

THIS COURT OF JUDGE CRENSHAW DOES NOT WANT TO GET ENTANGLED IN LETTING THIS **DEFENDANT REQUIRED TO TURN PLAINTIFF TO STOP THE FRAUDS BY CHURCH MEMBERS AND ATTORNEYS DEFEND HIMSELF AND REDRESS THE FRAUDS MADE MY THESE PASTORS AND CHURCH MEMBERS EVEN TO THE COURT OF JUDGE PALOMINO AND TIMMERMAN AND CRENSHAW AND LATER FRAUDS TO JUDGE GOMEZ AND JUDGE SIERRA AND THE APPEALS COURT AND OTHERS!** THESE CHURCH DEFENDANTS OF FREE WILL CHOSE TO USE THE COURTS AND THIS DEFENDANT TURNED PLAINTIFF HAS REDRESS RIGHTS TO SHOW THE CRIMINAL ACTS BEING WILLFULLY, MALICIOUSLY DONE BY HATE CRIMES AGAINST THIS PLAINTIFF!

b. HEARING ON July 9, 2004;

- (1) Mr. Denny admits he states “I get paid, but as an officer of the Court, I have seen everything that has been produced from Mr. Townsend.” But full production he blocks which will expose more criminal hate crimes of his clients that he helps them to keep hid from the courts and from prosecution as he has done in the past as the records show.
- (2) Mr. Denny admits he has read the transcript of the hearing before Judge Palomino of November 15, 2001, and the transcripts have been given to this court!
- (3) Mr. Denny admits “THERE WERE ALLEGATIONS OF STALKING OF MY CLIENTS AND THEY RESPONDED IN A WAY THAT THEY

THOUGHT WAS APPROPRIATE.” First it was stated by Attorney DENNY, “**CLIENTS**” as not just **CLIENT** singularly as RON BECK but “**CLIENTS**” as the “Church” “as FBCCP, a Corporation” and all the “members at large” AND “...THEY RESPONDED IN A WAY THAT THEY THOUGHT WAS APPROPRIATE. THE COURT DID NOT ENTER A TEMPORARY INJUNCTION”! EVEN MR. DENNY SAYS HIS “**CLIENTS**” were there in the court with **RON BECK not RON BECK individually** so this court cannot restrict this PLAINTIFF FROM REDRESSING IN A MALICIOUS PROSECUTION ACTION ALL THOSE WHO ACTED WITH MALICE AGAINST THIS DEFENDANT TURNED PLAINTIFF! **This shows conspiracy and Frauds by BECK, MEISTER, HOWLETT and maybe others including now the former wife to:**

**(1) Create fraud of circumstances of actual events, (2) to create fear, (3) to misdirect attention from events done by these in the conspiracy, (4) To block future investigation by this Defendant/Respondent/ Now Plaintiff Pro se, (5) to give legal advise to a corporation not for profit from NON LAWYERS causing them to act.** Judge Palomiono saw through the frauds as stated by RON BECK admitting he was there as a pastor for the church and church members just as Mr. Denny admits these “**CLIENTS**” were in the court with RON BECK and Judge Palomino even hearing from the estranged employee wife now former wife and **not even hearing a proper defense from attorney Charles Scruggs presenting to Judge Palomino how RON BECK AND KAREN HARROD TOWNSEND WERE LIEING AND ATTEMPTING A FRAUD TO JUDGE**



**PALOMINO to cover up the crimes they had already done against this father and the children, did not allow the INJUNCTION in force from NOVEMBER 2, 2001-NOVEMBER 15, 2001, TO CONTINUE!** BUT THIS COURT HAS PROOFS FROM THE AFFIRMATIVE DEFENSE PRESENTED BY MR. DENNY AND IN THE TRANSCRIPT OF THE HEARING BEFORE JUDGE TIMMERMAN OF JANUARY 30, 2003, THAT RON BECK AND OTHER MEMBERS DID COME OUT OF THE COURT OF JUDGE PALOMINO AND DID FRAUD THAT THE ADVICE OF JUDGE PALOMINO WAS TO COACH THESE ALLEGED CHURCH PEOPLE TO “PURSUE CRIMINAL CHARGES” and this was NOT TRUE AS DEFENDANT TURNED PLAINTIFF HAS NOT DONE ONE VILE OR DANGEROUS ACT IN MY WHOLE LIFE! HIS CREATED CLAIMS OF STALKING IS EVENTS OF ME TO SEE AND BE A FATHER FOR MY KIDS AT THE CHURCH OR SCHOOL EVENTS WHERE I WAS AS A PARENT ALLOWED TO BE! ALSO INVITATIONS BY NAÏVE MEMBERS ASKIING ME TO BE AVAILABLE TO MEET WITH THESE MEMBERS TO RESOLVE THIS MATTER BEFORE IT WENT TO COURT! THE FACT THAT THE OUTRAGE OF ALLEGED CONDUCT SPOKEN BEFORE JUDGE TIMMERMAN AND CHARLES SCRUGGS NOT TRYING TO DEFUSE THIS OUTRAGEOUS AND ODIUS CONDUCT BUT IN FACT SCRUGGS INCITED ADDITIONAL OUTRAGE AND THEN FILED A MOTION TO DISQUALIFY THE JUDGE SHOWS CONDUCT STEMING FROM BECK AND MEISTER STILL PROSECUTES THIS PLAINTIFF PRO SE BY THE

INJUNCTION AND THE REQUIRING OF THIS PLAINTIFF PRO SE TO  
HAVE TO SELL HIS HOME FOR JUST \$10.00. And incur additional debt!

And from June 2002 till about December 2003, from frauds told by Denny and his  
clients and conspiracy with other attorneys, this plaintiff could not even learn the  
address of his children to go for a visit before the new injunction was signed by  
the EXPARTE FRAUD with Judge Timmerman!

(4) ACTUALLY, BECAUSE MY WIFE AND SON AND DAUGHTER UNTIL  
LATE 2002 OR THEREABOUTS HAD NOT MOVED THEIR  
MEMBERSHIP AND I NEVER WAS ALLOWED TO TAKE FULL  
ACTIONS BY THE BY-LAWS TO REMOVE MY MEMBERSHIP FROM  
THE CHURCH, BUT ALLEGEDLY BY TRICKERY AND FRAUDS  
BECK AS EVEN STRESSED TO JUDGE PALOMINO STATED AND  
ATTEMPTED TO VOTE ME OUT NEVER GIVING ME MY RIGHT PER  
FLORIDA STATUE TO ADDRESS THE MEMBERS BEFORE A  
STOCKHOLDER IS VOTED OUT (F.S. 617.10 CORPORATIONS NOT  
FOR PROFIT—Bylaws “...before membership shall cease against his  
consent he shall be given an opportunity to be heard,...” SO ACTUALLY  
MR. DENNY in 2002, till present is working against members of Plaintiff’s  
own family and Plaintiff himself as by the bylaws still a member and blocking  
Plaintiff from seeing records this Plaintiff tried to get since 1999 or earlier  
and was the major point on September 8, 1999, Beck started his intentional  
acts to keep the financial books hid by taking the keys of this member/officer  
doing his duties per the BY-LAWS of the Church and of the Florida Statues

as my goal is before my membership ends that I will produce the business checks, bank statements, credit card bills and statements and other financial records that prove Beck and Meister and other pastors were unethical with the books as other pastors were exposed as they operated under the directives of Beck and Meister but they resigned to get away from the Beck/Meister criminal patterns.

- (5) I HAVE TRIED SINCE SEPTEMBER 8, 1999, to get away from Beck and Meister and keep my family safe from their threats Beck and Meister did to my family on September 8, 1999, but they still use the courts to attack me and these courts ignore their vile and “ODIOUS AND OUTRAGEOUS” conduct and even allows them to lie to judges and does nothing to date to stop or punish these alleged pastors still working their scheme since 1995!
- (6) THIS COURT HAS THE EVIDENCE OF THE JANUARY 30, 2003, TRANSCRIPT OF THE CASE FILES OF THE ACTIONS BY THE ESTRANGED FORMER WIFE AS TOLD TO JUDGE TIMMERMAN WITH THE HELP OF HER ATTORNEY THAT “WE” MEANING BECK AND THE CHURCH MEMBERS AND HERSELF WERE “TRYING TO GET A MESSAGE ACROSS” AND SHOWS THIS CONSPIRACY TO COVER UP THEIR ORIGINAL VILE VIOLATIONS OF LAW AND PRACTICE OF FRAUDS AND HATE CRIMES AGAINST THIS FATHER AND HIS CHILDREN AND THIS COURT SEES THE RESULTS BY THE JUDGEMENTS SIGNED BY JUDGE TIMMERMAN AND THIS COURT AND OTHER JUDGES KNOW THAT JUDGE TIMMERMAN

WILLFULLY VIOLATED THE LAWS AND DID EXPARTE THESE JUDGEMENTS AND INCLUDING THE INJUNCTIONS THAT CONTINUES TO DAMAGE THIS FATHER FROM BEING A FATHER TO HIS CHILDREN AND HOW THESE CHILDREN HAVE BEEN ABUSED BY THE CONSPIRACY OF THE MOTHER/AS EMPLOYEE OF RON BECK AND THE CHURCH/SCHOOL MEMBERS! THIS INJUNCTION AGAINST THIS PRO SE TO NOT SEE HIS CHILDREN IS A VIOLATION OF THE LAW AGAINST A PRO SE OBSTRUCTING JUSTICE AND PREVENTING DISCOVERY OF EVIDENCE OF THE ABUSE THAT STILL HAUNTS THE CHILDREN AND THIS FATHER!

(7) Mr. Denny's own question was "WAS THERE A MALICIOUS PROSECUTION THERE?" My rebuttal again attempting to enlighten this court is that proofs of all of the misrepresentations by these clients in the church business records and proving who in the positions **of church officers were doctoring the company books will prove that they had motive** to act with malice and fraud to file the actions with Judge Palomino and then to Judge Timmerman and then to lie to this court will prove the frauds done then and then the frauds to cover up the new frauds even to this court through their lying to their attorneys and judges by their own testimony! I have a right to redress their first frauds against me saying that they were doctoring and hiding money and other lies being done to the company books! These criminals made my acts of being an honorable father as alleged acts of

stalking that JUDGE PALOMINO SAW AS STUPID LIES NOT RISING  
TO THE LEVEL TO SHOW ME AS IN ANY WAY DANGEROUS!

- (8) On page 9 of this July 9, 2004, testimony of Denny he states “The Second District has denied Mr. Townsend’s appeal recently. He appealed the Court’s order on the motion to dismiss that got rid of everything but the malicious prosecution action.” This Second District decision was not on the merits of the case but I contend was by an act based on negligence and fraud that the appeal was “UNTIMELY filed” due to the delay of receiving the mail by the clerk of the courts office as they were moving to the new 800 E. Twiggs Street court house and the mail was not stamped as received for several days as the records show and per the testimony of the clerk of the court on the February 10, when the second set of papers were stamped and this is what was used by the Dickinson & Gibbons firm to get the appeal dismissed!
3. ATTORNEY DENNY AGAIN IN HIS MOTION FILED SEPTEMBER 16, 2005 is trying to trick this Judge by stating language to remind this Judge of things that actually were not said as this judge can see in the transcripts as attached herein or previously filed, do not verify the statement by Denny of “This Court has already admonished Plaintiff numerous times for seeking broad and irrelevant discovery and not related to Plaintiff’s malicious prosecution action, and Defendant will be filing a Motion for Sanctions accordingly”. This court and this defendant/respondent/plaintiff still has the question of SHOULD THE DEFENDANTS BE EXPANDED TO BEYOND RON BECK, individually, and even in the March 31, 2004, hearing mainly on the point here regarding this MALICIOUS PROSECUTION COUNT and

expanding this count beyond RON BECK, individually, and this Court told this Defendant/Respondent/Plaintiff “You have 20 days from today here to file an amended complaint as to the church body.” As was done timely. At best without the discovery of ALL as a starting point to discovery of poison flowing from the mouths of the corporate officers and including Beck, the CHURCH BUSINESS MEETING MINUTES from 1999-to current as REQUESTED FROM THE FIRST COMPLAINT FILED, APRIL 2002 to present as noted above herein, all DEFENDANT/RESPONDENT/NOW PLAINTIFF can submit to this court as PROOFS of conspiracy by Ron Beck, individual, and in his role as the SENIOR PASTOR and AS RON BECK AS AN OFFICER OF THE CORPORATION and as a COUNSELOR to Church Members who assisted him then in his fraud to Judge Palomino and to cause the MALICIOUS PROSECUTION and other acts of HATE CRIMES done on public property at malls or post offices or public streets using Sheriff Deputy cars to harass this DEFENDANT/RESPONDANT/PLANTIFF AND HIS FAMILY against this DEFENDANT/RESPONDENT/PLAINTIFF even in the courts of Judge Palomino, Judge Gomez and Judge Sierra and other agencies is to present to the court the transcripts of the November 15, 2001 hearing before Judge Palomino in case number 01-15813 and the church by laws and the letter sent certified mail received 8/2/2000, to Dr. Lynn the family doctor/church member/husband of the Plaintiff’s children’s counselor/DEAN at the private school where they attended and also a voting member who after this letter did multiple yet undisclosed malicious personal attacks on this father/plaintiff and did later contribute to the duress on the Townsend Daughter as reported by letters from the original

family physician, Dr. Hoyos, a highly respected Doctor in this community.

Defendant/respondent/father/Plaintiff reminds this court that the original complaint filed in April 2002, pointed out the duress and harms being done to the family children by these Church/School members and by the pastors and by Dr. Lynn, but due to the refusal of production by attorney Denny at that time to present many acts of the defendants to create additional acts of conspiracy and damages to the Townsend family, this plaintiff and the Townsend children and former wife has not allowed to be discovered so that additional acts can be pursued legally or noticed to this court and attached as exhibits in this complaint to justify and explain the charges in this APRIL 19, 2004, AMENDED COMPLAINT which will educate this COURT and other courts to allow this DEFENDANT/RESPONDENT/FATHER/PLAINTIFF to stop the hate crimes this alleged church does outside of the BY-LAWS and Florida Statues they are bound by their own contract in the BY-LAWS agreeing to respect to this Member/Defendant/Respondent/Plaintiff BOTH ON THE CHURCH/SCHOOL PROPERTY AND OFF THE PROPERTY ON PUBLIC STREETS AND MALLS AND THIS PLAINTIFF'S PLACE OF EMPLOYMENT! The Church BUSINESS Minutes as similar to the EXHIBIT FOUR as enclosed in the AMENDED COMPLAINT will add to additional proofs for this court of (1) money issues, (2) the pastors frauds of the church expansion/building program which will credit the testimony of this church member as CHAIRMAN OF THE LONG RANGE PLANNING COMMITTEE (3) proofs of frauds told by corporation officers to the stockholders which will credit the charges made by this member/stockholder and provide proofs of the knowledge these stockholder/members had and then acted or

refused to act to assist Ron Beck's statements of frauds made to Judge Palomino in Becks testimony to Judge Palomino showing he supported the actions on behalf of the other members.

4. THESE PROOFS ARE NOT ENTANGLEMENTS OF WHAT THE CHURCH BELIEVES FROM THEIR "RELIGIOUS BELIEFS" BUT WILL SHOW THAT THESE ACTS ARE OPPOSITE WHAT THEIR RELIGIOUS BELIEFS AS STATED IN THEIR OWN BY-LAWS STATES THEY WILL PRACTICE OR THEMSELVES BE SUBJECT TO DISSMISSAL FROM BEING A MEMBER AND THESE ACTS ARE PER THE SUPREME COURT NOT BLANKET APPROVED CONDUCT OUT OF THE SCOPE OF REVIEW OF THE COURTS AS THEIR RELIGIOUS ACTIONS SHOULD BE CONTAINED TO MAYBE JUST THEIR PRIVATE PROPERTY AND NOT OPEN FRAUDS AND HATE CRIMES PRACTICED EVEN UNDER OATH LYING TO A JUDGE OR OUT IN A PUBLIC MALL OR POST OFFICE OR ACTS OF INTENTIONAL FRAUD TO KEEP THIS FATHER FROM RAISING OR SEEING HIS OWN CHILDREN AS THIS PASTOR AND SCHOOL AND SCHOOL DOCTOR AS DR. LYNN THE HUSBAND OF THE SCHOOL DEAN, HAS DONE BY ACTS SINCE 1996 TO LIE AND BRAINWASH TO THIS FATHERS OWN CHILDREN TO CAUSE THESE CHILDREN TO HATE HIS FATHER AS THE FACTS PROVE THAT MANY TIMES THIS COURT CANNOT BE SHOWN BECAUSE MR. DENNY BLOCKS DISCOVERY AND JUDGE TIMMERMAN BEING INFLUENCED BY BECK AND HIS CO MEMBERS FRAUDS HAS ALSO PUT THIS



DEFENDANT/RESPONDENT/PLAINTIFF UNDER AN INJUNCTION BY THE  
FRAUDS AND MALPRACTICE IN HIS OWN COURT!

5. And as DENNY has done in these transcripts of July 2004 made misrepresentations that do not follow the facts of the appeal ruling or his First Affirmative Defense do not match the transcripts of the November 15, 2001, hearing as shown herein.
6. EVEN PERSONS IN BECK'S INTERROGATORY ANSWERS SHOULD BE CO-DEFENDANTS AS CHURCH MEMBERS AND EVEN THE ANSWERS GIVEN BY BECK SHOW HOW THEIR TESTIMONY WILL ADMIT THEIR ROLES AND HOW THEIR ACTIONS HELPED HIM TO DO HIS FRAUDS TO OTHERS INCLUDING THE COURTS! THESE ALLEGED WITNESSES OF BECK ACT TO IGNORE THE MISSING MONEY AND CLAIMED FRAUDS ABOUT MY ACTS TO BE A FATHER TO MY KIDS AS THEY IGNORE THE FACTS BECK WAS HIDING AND MISUSING MONEY THIS DEFENDANT/PLAINTIFF WAS TOLD BY THEM TO FIND!
7. BY NOT GRANTING THIS PLAINTIFF FULL DISCOVERY THAT HAS BEEN REQUESTED THIS DEFENDANT/RESPONDENT/PLAINTIFF IS TRYING TO PROTECT HIMSELF FROM A CONSPIRACY BY THE SENIOR PASTOR RON BECK AND THE PASTOR OF THE SCHOOL HERMAN MEISTER IN THEIR SCHEME(as Meister himself confessed "he was ashamed he helped Beck in the first place", starting in the mid 1990's to remove both Dr. Berry and this member Randall Townsend from leadership as we did not know how we blocked Becks total scheme) TO RAISE MONEY AND USE THE FRAUDULENTLY GAINED MONEY TO CONSPIRE WITH EACH OTHER TO GIVE FALSE INFORMATION TO AN

INDEPENDENT CHURCH PLANNING COMPANY (COGAN INDUSTRIES)  
AND TO DISCREDIT THIS CHURCH MEMBER THEY BY TAKING THIS  
DEFENDANT/RESPONDENT/NOW PLAINTIFF TO THE COURT OF JUDGE  
PALOMINO TO FURTHER THEIR PLAN OF CONSPIRACY TO DISCREDIT  
THIS PLAINTIFF THAT HE WAS ACTUALLY TELLING THE FRAUDS AND  
ALLEGEDLY DANGEROUS TO CHURCH MEMBERS AND EVEN HIS OWN  
FAMILY AS A FRAUD TO COVER UP THE FACT THAT THE ACTIONS OF  
THIS PLAINTIFF HAVE BEEN PURELY HONORABLE AND HAVE  
REQUIRED THE CONSPIRACY OF BECK AND MEISTER TO  
FRAUDULENTLY RAISE MONEY AND NOT HIDE THE MONEY BUT TO  
ALLEGEDLY IN FULL REPORT THE MONEY AFTER THE SEPTEMBER 8,  
1999, ACT OF CONSPIRACY BY RON BECK AND HERMAN MEISTER AND  
OTHER AND WITH NOW THE PROOFS WITH THE BUILDING PROGRAM AT  
THE NEW PROPERTY ON GUNN HIGHWAY TO STILL NOW AFTER FIVE  
YEARS TO NOT BE COMPLETE OR "PERMITTED" BY THE COUNTY AS  
THIS PLAINTIFF WARNED IN 1998-1999, THIS COURT IS GIVING THESE  
PASTORS VARIANCE TO THE PRACTICE OF ALL NOT FOR PROFIT LAWS  
AND VARIANCE FROM THE CIVIL RESPONSIBILITY TO NOT IN BUSINESS  
MEETINGS OR ON ANY PUBLIC PROPERTY TO AT WILL JUST CONTINUE  
TO TELL LIES AND FRAUDS ABOUT THIS PLAINTIFF AND EVEN TELLING  
LIES TO THIS COURT TO PREJUDICE THE OPINIONS OF THE CLERK OF  
THE COURT, JUDGE PALOMINO, JUDGE TIMMERMAN, JUDGE GOMEZ,  
JUDGE SIERRA, AND TO THIS COURT BY EVEN THE ATTEMPT OF

ATTORNEY DENNY IN HIS FIRST AFFIRMATIVE DEFENSE TO MAKE A CLAIM THAT THIS PLAINTIFF IS DANGEROUS BUT HAS YET TO SHOW ONE ACT OF ANY DANGEROUS CONDUCT AS THIS WAS USED BY THE COURT OF JUDGE TIMMERMAN TO GRANT AN INJUNCTION AGAINST THIS PLAINTIFF CHILDREN WHO WERE BEYOND THE AGE OF 18 AT THE TIME THIS INJUNCTION IS SIGNED. THIS CONDUCT ALLOWS THESE PASTORS TO COME BETWEEN THIS FATHER AND HIS CHILDREN WHILE THESE ALLEGED PASTORS BRAINWASHED THIS PLAINTIFFS WIFE, AND CHILDREN AGAINST THIS PLAINTIFF SINCE THE CHILDREN WERE THE AGE OF 10 & 12 AND THIS FATHERS RIGHTS WERE ABUSED BY THE CHURCH PASTORS AND THE COURT AND NOW THIS COURT CLAIMS IT HAS NO JURISDICTION FOR THIS DEFENDANT/RESPONDENT/ NOW PLAINTIFF TO CLEAR HIS SLANDERED REPUTATION OR UNTIL THESE INJUNCTIONS ARE REVERSED EVER BE A DAD TO HIS CHILDREN OR GET THESE NOW ADULT CHILDREN THE NEEDED PROFESSIONAL MENTAL AND PHYSICAL CARE THAT HAS RESULTED FROM THE LIES OF RON BECK AND HERMAN MEISTER IN THE 1990's CONSPIRING TO FRAUD THIS MEMBER/DEFENDANT/RESPONDENT/PLAINTIFF AND HIS FAMILY AND OTHERS! THE ACTS OF JOE HOWLETT A HILLSBOROUGH SHERIFF DEPUTY, THESE ATTORNEYS AND THESE COURTS VIA LIMITING DISCOVERY AND PLACING SANCTIONS AGAINST THIS DEFENDANT/RESPONDENT ARE ALLOWING CRIMINAL ACTIONS BY BECK AND HERMAN MEISTER AND JOE HOWLETT TO BE ABOVE THE

LAW THIS COURT IS ALLEGEDLY REQUIRED TO ENFORCE IF THIS THEN IS NOT CARRYING OUT THE FRAUDULENT PLAN AS DESCRIBED ABOVE TO EXTORT A MEMBER TO EITHER HELP THEM LIE AND VIOLATE THE FLORIDA STATUES OR HE IS TO LOOSE HIS CIVIL RIGHTS AS A FATHER/HUSBAND/CITIZEN TO FREELY WALK DOWN THE STREET AND AS AN ADDITIONAL MEANS TO ACCOMPLISH THE PLAN OF RON BECK AND HERMAN MEISTER THEN THEY WOULD USE EXTORTION AGAINST THE WIFE/EMPLOYEE TO LIE TO HER HUSBAND ABOUT THE FAMILY FINANCES AND THAT THIS HUSBAND WAS ALLEGEDLY VIOLENT IN A CHURCH BUSINESS MEETING AND THAT SHE AND HER KIDS SHOULD BE AFRAID OF HER AND HER KIDS BEING HURT BY THIS PLAINTIFF SO THE COURT TO PUNISH THIS MAN HAS NOW FOR THREE YEARS KEPT THIS FATHER FROM SEEING HIS KIDS SO A DIVORCE JUDGE AND THE ATTORNEY'S ARE NOT DISCOVERED FOR MALPRACTICE! **ONE MUST SCREAM "ODIOUS AND OUTRAGEOUS"!** **HOW CAN A COURT PROTECT SUCH A PLAN BY TWO MEN CLAIMING TO BE PASTORS TO BRAINWASH, PUNISH CHILDREN, AND OUTRAGE MANY PEOPLE TO PUNISH A MAN WHO REFUSED TO LIE TO CHURCH MEMBERS ABOUT MISSING MONEY AND A BUILDING PLAN THAT REMAINS A FAILURE TO THIS DAY!?**

8. THIS COURT HAS YET TO PER THE STANDARD SET IN THE FLORIDA SUPREME COURT PER THE RULING IN **DOE V. EVANS** SC94450, MARCH 14, 2002, REQUIRED ATTORNEY DENNY TO EXPLAIN HOW BECK,

MEISTER, BROWN, HOWLETT AND LEATHERMAN WHO ENGAGED IN ACTS OF MARITAL COUNSELING HAVE NOT VIOLATED THIS FIDUCIARY DUTY AND MUCH GOES AGAINST BROWN WHO DID AN INAPPROPRIATE SEXUAL ACT AGAINST THE NOW FORMER WIFE OF THIS DEFENDANT/RESPONDENT/PLAINTIFF IN JULY, 1999. NOR HAS BECK, BROWN AND MEISTER BEEN SHOWN WHY THEY COULD BREACH THE FIDUCIARY DUTY AS PASTORS AND A SCHOOL PRINCIPLE TO THESE MINOR CHILDREN/STUDENTS OF THIS FAMILY AND THE NOW FORMER WIFE AS HIS EMPLOYEE OR TO THIS DEFENDANT/RESPONDENT/PLAINTIFF AND INTERFERE WITH AND CAUSE MENTAL AND EMOTIONAL DAMAGE AND DURESS AND PHYSICAL HARM TO THE WIFE, DAUGHTER AND SON OF THIS DEFENDANT/RESPONDENT/ PLAINTIFF BY CAUSING FRAUDS AND LIES TO THIS PLAINTIFF AND HIS WIFE AND CHILDREN CAUSING THE PEER PRESSURE AND LOSS OF A FATHER TO EMOTIONALLY FOREVER DAMAGE THE FAMILY RELATIONSHIP THAT A CHURCH STATES IT IS TO PROMOTE! THE "ODIOUS AND OUTRAGEOUS "FRAUDS AND TORTS DONE BY THESE PASTORS DO NOT COME UNDER THE PROTECTIONS OF THE FIRST AMENDMENT! THIS PLAINTIFF NOR THE WIFE OF THIS PLAINTIFF DID NOT INVITE THE VOYEURISM ACT IN JULY 1999, BY WILLIAM BROWN ON THE NOW FORMER WIFE AS A CAUSE OF STRESS IN THE MARRIAGE LEADING TO THE ACTION OF DIVORCE AND THE

INJUNCTION AGAINST THIS PLAINTIFF WHO WAS VIOLATED BY  
WITNESSING THIS PASTOR DO THIS ACT ON HIS WIFE!

9. THIS COURT HAS NOT REQUIRED ATTORNEY DENNY TO PER MALICKI 814 So2d 347 (Fla 2002) Supreme Court, to argue or meet the stipulations of the FREE EXERCISE RULE, THE ESTABLISHMENT CLAUSE or the CONSTITUTIONAL LAW 84.1, “Threshold inquiry in determining whether a law establishing standards of conduct implicates the Free Exercise Clause is whether there is a conflict between conduct that is required by the law and conduct that is prescribed or prohibited by religious principles. The laws require not for profit corporations to be truthful about the company financial records. The laws require a not for profit member the right to be heard openly before he is discharged as a member and I was denied this right many times to address the members at large due to Beck, Jeffers, Howlett and Meister claiming I was “dangerous” and a “liar”. The law does not allow a school to violate its students as the records show my daughter was abused by the school. The law allegedly does not allow a person to come before the bench and intentionally lie!
10. THIS COURT HAS NOT REQUIRED ATTORNEY DENNY TO ARGUE HOW HIS CLIENT AS PART OF HIS RELIGIOUS BELIEF COULD SPREAD FRAUD EVEN TO THE JUDGE PALOMINO AND WITH THE ASSISTANTS OF AN EMPLOYEE AND ANOTHER PASTOR HERMAN MEISTER AND A TRUSTEE/SHERIFF DEPUTY TO LIE AND CONSPIRE TO DO FRAUD TO THE COURT OF JUDGE PALOMINO AND TO JUDGE TIMMERMAN.

11. THIS COURT RULING THAT THIS COURT HAS NO JURISDICTION OVER THE ACTS OF OTHERS OTHER THAN RON BECK, INDIVIDUALLY THEN SHOWS CONFLICT WITH:

(A) THE RULING OF THE CLERK OF THE COURT WHO ENTERED THE INJUNCTIONS IN NOVEMBER 2-15, 2001, USING THE FRAUD TESTIMONY GIVEN TO GAIN THE TEMPORARY INJUNCTION

(B) JUDGE PALOMINO PER HIS TESTIMONY IN THE NOVEMBER 15, 2001, HEARING AS PER THE TRANSCRIPT OF CASE 01-15814, Townsend v. Townsend ON PAGE 16, Judge Palomino wisely shows concern that this father is being denied his rights to see his kids yet this court ignores that this Defendant and other CO CONSPIRATORS continued lies to outrage the courts until an injunction was done that took away the rights of this father for doing even less than what was alleged to the court of Judge Palomino in 2001 but these defendants took away this fathers rights anyway ignoring the advice of the court and then proudly and fraudulently to others did lie about the ruling of Judge Palomino that “criminal charges were necessary as their next step because of the alleged vile acts of stalking” by this defendant/respondent/now plaintiff! A position Denny wrote in his First Affirmative Defense. On Page 7, of the BECK V TOWNSEND case no 01-15813, Judge Palomino again wisely tells Beck that “And the first thing to everybody that I have to do is you swear to tell the truth.” Mr. Beck has yet to start telling the truth and the Church Business Meeting Minutes and Corporation books and his Church credit card purchases will show his frauds and his whole reason for asking for the injunction was not because of physical harm but because I can expose criminal acts

he has done that should put him in jail and others that helped him. NAÏVE PEOPLE GET SUCKED IN BY HOW TRICKY AND EVIL HE CAN BE AND THEN BECAUSE OF THEIR GUILT THEY HAVE HELPED HIM THEY GET QUIET OR TURN TO HELP HIM TO COVER UP FOR THEIR CRIMES. And the testimony of JUDGE PALOMINO on page 17, of 01-15813 clearly states by Judge Palomino, "...but I'm not sure that this necessarily rises to the level of what the law requires for me to see for, you know some type of injunctive protection where there's the underlying basis of threats or bodily harm. I have not seen it anywhere. If he does sue you all, the things that he's called you, you know I could call you all kinds of names today, and it might be, as you say, slanderous and lies and libel, and you have recourse under the law by a civil lawsuit against him--" So for Judge Palomino to grant Beck the right to sue me and this Defendant then not have the right to file to defend himself due to the slanderous and vile acts of hate crimes practiced by Beck and his co-horts to take away the civil rights of this father and damage his kids is a fraud by any other court that will not allow this redress of crimes done by Beck and his co members of the corporation! Not allowing this Defendant/respondent/ now plaintiff to file and redress the frauds done to him make the words of Judge Palomino a liar! WISE WORDS FROM JUDGE PALOMINO AND JUDGE ARNOLD PREVENTED THEM FROM BEING DECEIVED BY BECK AS THEY SEE THROUGH HIS ACTIONS TO THE CORE OF HOW VILE HE REALLY IS WILLING TO BE TO WORK HIS EVIL! Judge Arnold in the January 21, 2003, hearing rebukes Attorney Denny and did not shut the door but allowed this PRO SE to replead the allegations. Judge Arnold did as the intent of the Supreme Court



communicates in allowing discovery to be ongoing until the pleadings are completed as it is premature to dismiss an action based on FREE EXERCISE or ENTANGLEMENT while the case is in the Pleading stage as this case still is pending the Requested Discovery as shown herein for the additional proofs for the Malicious Prosecution defense to the allegations of all the witnesses Beck may call as shown by his interrogatory answers as this Plaintiff tries to redress the Malicious Prosecution actions done against this Defendant/Respondent/ Now Pro se Plaintiff.

(C) JUDGE TIMMERMAN BEING PREJUDICED BY THE ALLEGATIONS MADE BY TURMEL, KAREN THE FORMER WIFE AND ATTORNEY SCRUGGS SILENCE, USING THE ACTIONS OF BECK TO CAUSE A SENSE OF DANGER BY THIS DEFENDANT/RESPONDENT/PLAINTIFF

12. THEREFORE IT IS THE DUTY OF THIS COURT TO SANCTION THE DEFENDANTS AND THE ATTORNEYS WHO HAVE VIOLATED THE RULES OF CIVIL PROCEDURE AND VIOLATED THIS COURT BY THEIR FRAUDS TO EVADE THIS PRODUCTION OF DOCUMENTS WHILE ALLOWING THEM UNDER THE SUPERVISION OF THIS COURT TO ADD ADDITIONAL FRAUDS AND TORTS AND HATE CRIMES AND DAMAGES TO THIS PLAINTIFF WHILE THESE DEFENDANTS AND ATTORNEYS FRAUD THE COURT IN ORDER EVADE THE CONSEQUENCES OF THEIR ORIGINAL FRAUDS!

13. THE FACT THAT MULTIPLE INJUNCTIONS HAVE BEEN PLACED BY THE COURTS AGAINST THIS DEFENDANT/RESPONDENT/NOW PLAINTIFF PRO SE BY FRAUDS DONE BY ALL THESE DEFENDANTS AND ATTORNEYS

CONTINUE TO HAUNT AND HURT MY REPUTATION AS A STILL LAW ABIDING CITIZEN AND I HAVE A RIGHT TO PROVE THOSE INJUNCTIONS ARE FRAUD AND REDRESS THE FRAUDS FILED IN THE COURTS TO GET THOSE INJUNCTIONS OTHERWISE MY CIVIL RIGHTS WILL FOREVER BE DAMAGED BY THE FRAUDS OF AN ALLEGED “pastor” WHO HAS BEEN CAUGHT LYING TO CHURCH MEMBERS, HIS OWN WIFE AND KIDS AND MOTHER AND FATHER, MY KIDS, MY PARENTS, MY NOW FORMER WIFE, MY FORMER FRIENDS, HIS ATTORNEYS, SEVERAL JUDGES AND THIS COURT AND THIS COURT IGNORES MATTERS BECAUSE HE IS AN “alleged” “pastor” not practicing his religion or religious beliefs he preaches but is doing vile criminal acts now for over 10 years right under the nose of the court because alleged officers of the court do not want to make a church look bad and let them freely still practice every hate crime they want to do even in the courts! This “alleged pastor” Ron Beck has with malice used employees, church members, church officers, sheriff deputies as church officers, a doctor, attorneys, judges and others to do his criminal acts to cover up the fact he was stealing money and property from a church/school and has done many other vile hate crimes and this court now for 10 years has let him walk the streets and spread more hate and vile acts while he continues his frauds not religious beliefs which even the SUPREME COURT SAYS NOT ALL BELIEFS CAN BE ACTED ON FOR THE BENEFIT OF SAFETY OF ALL CITIZENS! Even these kids have seen this alleged pastor acts opposite to his teachings and this has caused them many acts of emotional stress, duress, pain and suffering and confusion and has damaged their lives and this court acts ignorant to the damages

Beck and other officer/members continues to cause! I have proved these alleged stalking events were from people who had major reasons to cover up their extreme outrageous and odious criminal acts and yet I cannot overturn their frauds as liars and remove the injunctions that these people continue to get on me raising or seeing my children because these courts want to block my further discovery of other criminal acts these people have done and continue to do and this has gone on for now 10 years by this “alleged pastor”!

14. THIS COURT HAVING NOT YET RULED ON THE SECOND AMENDED COMPLAINT filed APRIL 19, 2004, as per the court directed to AMEND under ONLY the Malicious Prosecution Count that the Church, and members at large and individuals as listed and as more discovery is done new individuals should be listed and should be co defendants. HOWEVER NOTWITHSTANDING, AS **ATTORNEY DENNY HAS ALREADY ANSWERED FOR HIS CLIENTS TO THIS AMENDED COMPLAINT AND STATED IN THE TRANSCRIPT OF JULY 9, 2004, (well past the 20 days he would have been allow to protest after the filing and service upon him as their attorney) Attorney Denny acknowledged his “clients” acted as they thought they should do as stated in the SECOND AMENDED COMPLAINT OF APRIL 19, 2004, so this court should not rule on this until this same court allows this Defendant/Respondent from the Malicious actions filed by Beck and these individual members and as the Church Corporation and members at large turned against this Plaintiff on this count to see and PLEAD in full all: of the Church Business Meeting Records from 1999-2005; all credit card receipts of Ronald L Beck using the Church credit card; all**

financial records as requested now since the trail of requests shows as above were started at the beginning of this Defendant turned Plaintiff started trying to defend himself!

15. THIS COURT AND ANY OTHER COURT AND FLORIDA BAR ASSOCIATION AND JUDICIAL QUALIFICATIONS COMMISSION AND ALL GOVERNMENT AGENCIES INVOLVED MUST KNOW THAT SEVERAL CIVIL RIGHTS ATTORNEYS AND EVEN IN THE ATTORNEY GENERAL'S OFFICE STATE THAT BECK AND THE CHURCH HAVE NO LEGAL PROTECTIONS UNDER MALICKI OR KOND OR BY EVEN THE WORDS OF JUDGE PALOMINO OR ANY OTHER CASE AND NO JURY WILL LET BECK OR HIS CO-HORTS FREELY WALK THE STREETS AFTER ALL THE VILE THAT HAS BEEN DONE IS MADE PUBLIC BUT THEY DESERVE JAIL! THE POSITIONS OF DAVID GIBBS III, DREW GARDNER, CHARLES DENNY IV and other attorneys including Scruggs to cover up his malpractice trying to use MALICKI OR KOND to allow these church members to do have they have done are also guilty of assisting Beck and Meister and Brown and Leatherman and Howlett and Jeffers and other members and the corporation as a whole continue their frauds!

16. Also I have been advised that this sanction of \$924.00 on this Plaintiff was wrong since this court has yet to require these defendants to even produce one piece of paper per the multiple requests for discovery as shown herein above and by the attorneys misrepresentations trying to use the MALICKI and KOND cases to promote fraud while their clients work to deceive the courts as productions of these documents will show this Plaintiff PRO SE was telling the total truth to the pending MALICIOUS

PROSECUTION COUNT STILL BEFORE THE COURT in all his answers based on the full knowledge he could yet have at this time without the production of the full case still in the pleading phase as this court still want proofs to show other members and the corporation acted with individual Beck!

17. WHEREFORE, THIS COURT HAS ALREADY PROVED THAT ATTORNEY SCRUGGS ACTIONS TO JUDGES PALOMINO AND JUDGE TIMMERMAN AND JUDGE GOMEZ AND MAYBE OTHER JUDGES, WERE MALPRACTICE AND WORKED TO HARM THE KNOWLEDGE OF HIS NOW FORMER CLIENT, THIS PLAINTIFF PRO SE AND THAT THE RULINGS BY JUDGE TIMMERMAN TO GRANT AN INJUNCTION USING TESTIMONY THAT WAS FALSE AND ALSO PER THIS COURTS PREVIOUS RULING TO LET THE CHURCH MEMBERS AND OTHERS, OTHER THAN BECK TO WALK AROUND FREELY AND STILL HARM THIS PLAINTIFF BECAUSE THE COURT ALLEGEDLY HAS NO JURISDICTION OVER THESE COURT MATTERS BECAUSE OF ALLEGED “ENTANGLEMENT IN A CHURCH DISPUTE,” YET JUDGE PALOMINO AND JUDGE TIMMERMAN, JUDGE GOMEZ AND JUDGE SIERRA STILL ENFORCE AN AMENDED JUDGEMENT, DONE EXPARTE BEHIND THE BACK OF THIS PRO SE TO FRAUD HIM TO COVER UP FOR THE MALPRACTICE DONE BY THE ATTORNEYS AND JUDGE TIMMERMAN-- CONTAINING AN INJUNCTION THAT WAS BASED ON THE TESTIMONY “ARISING OUT OF A CHURCH DISPUTE” AS SHOWN IN THE TRANSCRIPTS OF EACH TIME BECK OR THE NOW FORMER WIFE TESTIFY UNDER OATH AS MOST OF ALL THE

MATTERS STEMMED FROM THE POISION STARTED BY BECK AND MEISTER TO REMOVE THIS MEMBER BY FRAUDS, HIDE MONEY, FALSELY RAISE MONEY AND FRAUD PEOPLE ABOUT THE MONEY AND ABOUT THE BUILDING EXPANSION PROGRAM AND RAISE MORE MONEY TO DO THIS PROJECT FILLED WITH FRAUDS AS NONE OF THESE ACTIONS DEAL WITH FIRST AMENDMENT RELIGIOUS BELIEFS BUT ARE PURE OUTRIGHT FRAUDS AND SEDUCTIONS!

**WHEREFORE**, THIS PLAINTIFF PRO SE, PLEADS WITH THIS COURT TO CAREFULLY REVIEW ITS PRIOR RULINGS BASED ON THIS NEW INFORMATION FOR THE COURT AND GRANT LEAVE TO ADD ALL THESE DEFENDANTS AND THE CORPORATION AS STATED IN **THE SECOND AMENDED COMPLAINT** FILED APRIL 19, 2004, AS THIS PLAINTIFF PRO SE DID AS THE COURT HAD DIRECTED AND REMOVED ALL OTHER COUNTS BUT HOWEVER TO PROVE THE ALL ELEMENTS OF MALICIOUS PROSECUTION AGAINST ALL THESE DEFENDANTS THESE POINTS STILL MUST SHOW MANY OF THESE SAME ACTS TO PROVE THE ACTS WERE DONE **WITH MALICE AND “ODIOUS AND OUTRAGEOUS”** EVEN AS ADMITTED BY DENNY AFTER HE READ THE AMENDED PLEADING AND REALIZED AS HE SAID AFTERWORDS ON JULY 9, 2004, IN THE TRANSCRIPT BEFORE THIS COURT ON PAGE 8, “There were allegations of stalking of my clients and they responded in a way that they thought was appropriate.” AS THIS IS AN ACKNOWLEDGEMENT THAT ALL HIS CLIENTS KNOWINGLY DID TAKE

ACTIONS TO SUPPORT BECK AND THE OTHERS IN THE COURT OF JUDGE PALOMINO AND THE MOTIVES OF THESE CLIENTS CAN BE PROVED TO HAVE ACTED “WITH MALICE” AND “INTENT” AS STATED IN THIS AMENDED COMPLAINT AS THE ACTIONS LISTED IN THIS AMENDED COMPLAINT ALL GO TOWARDS EXPLAINING FOR THIS COURT THE “REASONS FOR AND ACTS OF MALICE” AND ACTIONS TO EXPRESS FRAUDS AND MALICIOUS ACTIONS PRIOR TO FILING THE NOVEMBER 2001 ACTION AND ACTIONS THAT SHOW THEIR MALICE CONTINUES OF FREE WILL BY THEM AGAINST THIS PLAINTIFF EVEN TO THIS DAY BOTH ON THE CHURCH/SCHOOL PROPERTY AND OFF THE PROPERTY ON PUBLIC AREAS AND EVEN IN THE COURTS AS THIS BAND OF PEOPLE ALLEGING TO ACT AS A CHURCH, STILL TRY TO HARM THIS PLAINTIFF AND HIS FAMILY SO TO EXTORT THIS PLAINTIFF TO NOT EXPOSE EVERY CRIMINAL ACT AND HATE CRIME THEY STILL DO UP TO AND FILING A PACK OF LIES TO JUDGE PALOMINO AND TO JUDGE TIMMERMAN ALLEGING “STALKING” AS A DEFENSE TO KEEPING THIS PLAINTIFF FROM NOT REVEALING HIS FINDINGS OF THE MISSING MONEY AND HOW THIS SENIOR PASTOR STOLE A MICROPHONE FROM THE AWANA KIDS OR THE SCHOOLS DAMAGES AND ABUSE TO THIS PLAINTIFF’S CHILDREN GOING TO THE SCHOOL TO JUST PEACEFULLY ATTEND THE SCHOOL THEY STARTED AS KINDERGARDENERS TILL THEY COULD GRADUATE THE 12<sup>th</sup> GRADE FREE FROM PEER PRESSURES AND ABUSE FROM NAÏVE TEACHERS NOT KNOWING OF THE FINANCIAL MISREPRESENTATIONS OR THE BUILDING PROJECTS FRAUDS OR OTHER

ACTS OF TORT BY BECK AND MEISTER AND BROWN AND NASWORTHY AND LEATHERMAN AND HOWLETT AND JEFFERS AND THEIR WIVES AS TEACHERS AND THAT THESE PASTORS DID CONSPIRE TO DAMAGE THIS PLAINTIFF AS THIS PLAINTIFF WILL TESTIFY UNDER OATH THAT HERMAN MEISTER ADMITTED THAT BECK AND HIM CONSPIRED TO REMOVE THIS PLAINTIFF FROM HIS ROLE IN THE LONG RANGE PLANNING COMMITTEE CHAIRMAN'S ROLE AS THESE PASTORS KNEW THIS PLAINTIFF DID NOT SUPPORT FRAUDS BEING TOLD TO THE MEMBERSHIP ABOUT THE FAULTY BUILDING PLAN, AND AT THE SAME TIME BECK AND MEISTER CONSPIRED TO REMOVE DR. BERRY FROM THE POSITION OF PRINCIPLE OF THE SCHOOL BECAUSE HE ALSO HAD QUESTIONS ABOUT THE GROWTH PLAN AND BECAUSE HE DID NOT WANT THE SCHOOL MONEY RELEASED TO THE FULL CONTROL OF BECK. DR. BERRY RESIGNED AND MOVED ON BUT THIS PLAINTIFF WAS TOO STUBBORN TO RESIGN AND LET THE FRAUDS CONTINUE IN A CHURCH THIS PLAINTIFF'S UNCLE HELP START IN THE 1940's AND A SCHOOL THIS PLAINTIFF'S CHILDREN WANTED TO BE IN FROM THE AGE OF KINDERGARDEN TILL GRADUATION BUT WERE FORCED TO LEAVE DUE TO THE CRIMES AND ABUSE BY BECK AND MEISTER AND OTHER TEACHERS AND STUDENTS INCLUDING BECKS OWN DAUGHTERS! BUT SINCE THESE MEMBERS DID NOT WANT CRIMINAL CHARGES BROUGHT AGAINST THE PASTORS THEN THEY WOULD RATHER PUNISH THIS DEFENDANT/RESPONDENT NOW TURNED PLAINTIFF SO TO KEEP ALL



THE CRIMINAL ACTS HIDDEN WHICH THEY FEAR IF THE AUTHORITIES GOT INVOLVED MAY HARM THE LICENSE OF THE SCHOOL.

PLAINTIFF ALLEGES THESE ACTS ARE NOT RELIGIOUS BELIEFS ACTIONS BUT ATTEMPTS AS A CULT TO EVADE CIVIL LAWS OF THIS PLAINTIFF AND THE FLORIDA STATUES AND FEDERAL TAX LAWS.

PER THE **PELLEGRINI v. WINTER** 476 S.O. 2d 1363 (Fla. 5<sup>th</sup> DCA) 1985, all these defendants can be sown to have benefited by this action to damage this Plaintiff for which this Plaintiff should be allowed to redress the harms and acts can be shown how they practiced MALICE at many other times to destroy and practice hate crimes for which Judge Palomino offered that parties should be allowed process in the court to litigate these issues. And after production of the document now requested since 2002, additional persons may need to be named and added to the pleadings after discovery is complete as this member of the corporation must continue the task these members at large asked this member/defendant/respondent/now Plaintiff Pro SE to do to uncover the illegal acts of these corporate officers to even expand to destroying this investigators integrity, family and children's good standing and subject this family to much pain and duress to hide their other criminal acts.

WHEREFORE, ALSO PLAINTIFF PRAYS THIS COURT WILL:

- A. GRANT ALL DISCOVERY AS REQUESTED NOW MULTIPLE TIMES AS SHOWN ABOVE AND
- B. SANCTION THESE ATTORNEYS AND
- C. SANCTION THESE DEFENDANTS FOR THEIR ACTS OF VIOLATIONS OF THE RULES OF CIVIL PROCEEDURE AND FRAUDS TO THE COURT

D. DENY DEFENDANTS MOTION FOR SUMMARY JUDGEMENT

E. ORDER ANY AND ALL OTHER MATTERS IN FAVOR OF THIS PLAINTIFF

AS THIS COURT DEEMS JUST AND PROPER FOR THE YEARS OF KEEPING THIS HONORABLE FATHER FROM SEEING HIS CHILDREN AND THE FRAUDS THESE DEFENDANTS HAVE DONE TO COVER UP THEIR CRIMINAL ACTS.

F. GRANT A HEARING AND TRIAL BY JURY AS Plaintiff pro se reminds this court

that the United States and State of Florida Constitutions both say “no law shall impede the obligation of a contract” and the By-Laws of the Church and School and the Florida States both agree this member before he was discharged had a right to see the full corporation books and then redress his words to defend himself before he was by fraud allegedly discharged from the non profit corporation by false representations by the Defendants trying to continue their frauds. These By-laws and Florida Statues also grant contract rights that this Plaintiff Pro Se is still requiring these alleged Pastors and other members to do that do not violate this Plaintiff and his children and I still endure this to show them I have not lied to them at any time because my love for them will not allow me to lie to my children or to the Church as it was intended to receive my truthful opinions and expertise without bias.

Respectfully submitted,

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Randall C. Townsend, Pro Se  
P.O. Box 21,  
Odessa, Fl. 33556  
941 350-2677

By: \_\_\_\_\_  
Randall C. Townsend

Certificate of Service

I hereby certify that a copy of the foregoing was provided by U.S. Mail this \_\_\_\_\_ day of \_\_\_\_\_ 2006, to First Baptist Church Citrus Park as Corporation and as said members as Defendants at 7705 Gunn Hwy. Tampa, Florida, 33625 via their attorney Dickinson & Gibbons, P.A. Post Office Box 3979, Sarasota, Fl 34230 and to the clerk of this Circuit Court at 800 E. Twiggs Street, Tampa, Florida, 33602. And to the Honorable Judge Crenshaw at 800 E. Twiggs Street, Tampa, Florida, 33602.

\_\_\_\_\_  
Randall C. Townsend

BEFORE ME, the undersigned authority, personally appeared, Randall Townsend, who produced the following identification \_\_\_\_\_, on this \_\_\_\_\_ of January 2006, and known by me to be the person who executed the foregoing document, who being duly sworn took an oath that the statements and the things contained herein are true and correct, to the best of his knowledge, information and belief.

NOTARY PUBLIC, STATE OF  
FLORIDA \_\_\_\_\_