

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 RONALD L. BECK MOTION TO DISMISS

AND

PLAINTIFF'S MOTION FOR DEFAULT

COMES NOW, PLAINTIFF RANDALL TOWNSEND, INDIVIDUAL, PRO SE,  
and as F.S. 617.0834 Representative and per F.S.617.022(b) and STATES:

BACKGROUND

Defendants have filed no "Defense in Law" and because of being in  
admitted Breach of Contracts Defendants as a Matter of Law have no  
Defenses at Law or Defenses by Motion per R.O.C.P. 1.140(b). By the filing  
of their "Fraud on the Court" Motion(s), Defendants Charles Denny IV, A.  
James Rolfes, the Firm of Dickinson & Gibbons P.A. and now through  
Attorney Rourke are in Breach of Contracts and estopped for these

**positions Denny and Crenshaw conceded in the underlying Complaints to this continuing new action including another illegal Beck advisor, conspirator John Grant with those Grant admitted 11/10/12 he illegally and ex parte conspired with, but now Defendants admit to collusion, perjury and Fraud on the Court and violations of F.R.O.P.C 4-3.1 as in their attempt to still defend criminal actions of Ronald L. Beck and Others as Defendants Dickinson ET AL already admitted were defeated and estopped on May 10, 2006 and now connecting “others DOE” and these Defendants admit their “ineffective services”, “Hate Crimes” as defined by judge Crenshaw and the same Charles Denny IV herein and malfeasance to their now alleged past clients, THE FBCCP/CPCS as these Plaintiff’s here as the true Owners and Operators of the FBCCP/CPCS as “non-sect” members who elected Randall Townsend as F.S.617.0834, since 1993, before the arrival of Beck as Senior Pastor to be their Representative per the Nominations Committee as the Supreme Court of our Bylaws advocating the BYLAWS and Legal Rights for Plaintiffs. By legal confirmation now of this intentional Breach(s) and admitting their past Breach of Contracts, and proved collusion with their co-conspirators even in evidence in the April 5, 2007, Transcript of the Hearing on a Motion To Dismiss as a “Fraud at Law” and a “Fraud at Facts” and “Fraud on the Court” to continue the Malicious Plot, Denny IV and Grant had with “alias” judges and in this judge Rex Barbas in this underlying connected case, Defendants here are forbidden per Contract Law and estopped to a further defense and this evidence**

**(FBCCP/CPCS Daily Records since 1994, especially since the admitted 10/1994, admission of Administrative Pastor Elbert Nasworthy of self-enrichment, tax evasion, Miss-directing of “Designated Funds” as confirmed by C.P.A’s but illegally concealed by Deputies Howlett, Jeffers, Smoak, Corbin and John Grant [with his admitted conspiracy with “alias” law enforcers, lawyers, politicians, and judges] and their co-defendants and “others doe”) must be used to show the conspiracy to conceal the Breach(s) and violations of law with their co-participants .**

**The underlying case, Townsend ET AL v Beck ET AL 02-03812, was illegally dismissed by collusion of these Defendants who have admitted their scheme to “Fraud the Court” and Plaintiffs and Citizens. The Appeal of the case was again by 11<sup>th</sup> Circuit Court En BANC, confirmed of collusion by Defendants in this case and the related cases.**

**Even the 4/5/2007, Transcript, CONFIRMS, Barbas and Denny IV, used known false evidence (claimed a 250+ page initial complaint and “repeated violations of the case management order . And it really could say repeated violations of all orders ever entered in this case.) and collusion back to judge Arnold even on the first page to as the 11<sup>th</sup> Circuit Court and Judge Canady and the 5<sup>th</sup> DCA admit, show the Malicious Plan of the lawyers and themselves now exposed in this 15-CA-1928 case.**

**This Complaint continues Townsends actions since 1987, now with Verified conceded proofs of “lawyer and judges and others ineffective services” that this 11th Circuit Court in earlier decisions on this LANE ET**

**AL extended case where LANE/McCarthy/Publix ET AL is proved involved in ongoing RICO ACTS and as Salinas v. United States 522 U.S. 52, (1997) in acts by alias judges, Florida Bar Members and Politicians and others who took or benefited from QUID PRO QUO RICO Bribes and therefore as required to recuse themselves and their earlier Orders are null and void as the Orders of Florida Supreme Court Chief Judge Charles Canady, the Order of Fifth DCA Judges in 2006, and Judge Crenshaw in 2006, and Judge Moody in 2007, show these Defendant co-participants as Lane/Publix ET AL RICO Participants.**

**“There is no question of general doctrine that fraud violates the most solemn contracts, documents and even judgments” See U.S. v. Throckmorton, 98 U.S.61, 64 (1878).**

**“Fraud vitiates everything, and a judgment equally with a contract...”(Id. At 66, citing Wells, Res Adjudicata, Section 499).”**

**“Courts are constituted by authority and they cannot [act] beyond the power dedicated to them. If they act beyond that authority and certainly in contravention of it, their judgment and orders are regarded as nullities. They are not voidable, but simply void, and this even prior to reversal. Elliott v. Peirson 1 Pet. 328, 340; Old Wayne Life Ass’n v. Mc Donough, 204 U.S. 8, 27 Sup. Ct. 236; (See Valley v. Northern Fire & Marine Ins. Co, 254 U.S. 348, 353-354 (1920).**

**“If the underlying judgment is void, the judgment based upon it is also void.” See Austin v. Smith, 312 F.2d 337, 343 (1962). Thus Defendants and**

**“Others DOE” concealment, omissions and frauds Under Color of Law denies due process to Townsend and Townsend ET AL.**

**The Supreme Court in Caperton v. A.T. Massey Coal Co. Ins. 556 U.S. (2009) per Tuney v. Ohio 273 U.S. 510, 532 (1927):**

**“Every procedure which would offer a possible temptation to the average man as a judge to forget the burden of proof required to convict the defendant, or which might lead him not to hold the balance nice, clear and true between the state and the accused, denies the latter due process of law.”**

**The Supreme Court states in Offutt v. United States, 348 U.S. 11, 14 (1954): “A judge receiving a bribe from an interested party over which he the presiding does not give the appearance of justice.”**

**Since 11/1987, Townsend informed his first Attorney Patricia McCarthy of criminal acts (Drugs and RICO Extortion for Publix Executives to pass money to elected officials and others.) by his “Joint Venture” Business Partner, Charles Lane Jr./Sabal Marketing who failed to provide “honest services” and who intentionally betrayed her client, Townsend/Future Marketing and began collusion with Defendants and “Others Doe” as being sued herein.**

**Since about 10/1994, Ron Beck, individual, and as Senior Pastor of FBCCP/CPCS, until Beck claims he resigned 3/1/2008, yet Townsend alleges and believes by facts show it was a forced resignation or else by the now partly educated of the frauds of Beck and his “sect” with**

**nonmember Deputies Jeffers, Howlett and Smoak illegally supported by Torts of John Grant ET AL, or be terminated because Townsend was finally in 2006 able to receive in part of his Bylaws Rights to receive at any demand the FBCCP business records demanded since 10/1994 and specifically on 9/8/1999 which showed Breach of Contracts and criminal acts as verified by Law enforcers and C.P.A.'s. and to conceal these crimes Defendants led illegally and by violations of the BYLAWS on 9/8/1999, allegedly removed Townsend from his FBCCP Officers Duties and in 10/1999 and since have illegally abducted Townsend from assembly with his children and his Church/School as Beck illegally in collusion with FBCCP Registered Agent and Lawyer/Senator John Grant, deputies, Townsend's now x-wife Karen Harrod, "alias" judges and others to continue Breach of the Bylaws, thefts, frauds and collusion in violation of Due Process and Civil Rights.**

**1. Plaintiff's request the Court to take judicial notice of: all Plaintiff's Objections and Replys to these Defendants Motions To Dismiss and specifically the arguments of Facts and Matters of Law raised in the FDLE Motion(s); and of the 4/5/2007, Transcript as all to be included in the evidence of Facts of this continuing case as Conditions Precedent.**

**2. Defendant Denny for Defendant Beck states this is a "rambling document" yet most of this Complaint is the conceded creation of Denny with "alias" honorable Judge Marva Crenshaw who on said date of 5/10/2006, upon other research revealed her continued collusion with her**

co-participants in their confirmed illegal Malicious Prosecution and “Fraud on the Court” actions. Townsend now submits the 5/10/2006, Transcript into evidence and requests this Court take judicial notice to be included in this cases record. Further as Denny lists his co-defendants, Townsend affirms that each has been duly informed of these crimes and each continues in their conspiracy and frauds assisting Lane/Publix et. Al. as Denny was also the admitted lawyer for “Members At Large” which included individuals as “implanted and impeding” Sheriff Deputies Joe Howlett, Tim Jeffers, Mike Smoak, Mike Corbin, and Judge Crenshaw 5/10/2006, and Judge Gomez in 2004, and Judge Holder and Judge Arnold and Judge Stoddard and Judge Sierra and Judge Timmerman and Judge Cook and others at other times admitted their guilt to the allegations of Malicious Prosecution assisting Beck and Karen Harrod Townsend and others as these acts still continue by their own admissions. Each Defendants alleged violation of “alias” “judges” Orders is actually proof of Townsend honorably and lawfully as now confirmed representing our Contract Rights per F.S.617 and per the Florida Constitution which exposes the lack of “Defense at Law” of these Defendants and others.

3. Defendant Beck was served in his persons and roles per F.S.617.022(b) and per relevant times for his parts in this ongoing scheme.

4. Defendant Denny admits, “Plaintiff has filed in this case is nearly

identical in all pertinent respects to the Complaint he filed in the prior case..." but now claims his admissions of guilt by Beck and others as defendants herein are "rambling" as an attempt at "Fraud on the Court". And as the transcript shows these added counts and Defendants were admissions by Denny and Crenshaw on 5/10/2006.

5. Denny and Beck are fully aware that Beck knowingly conspired with the advice of the "irresponsible attorneys" failing to provide "honest Services" to these Plaintiffs as Townsend and the FBCCP/CPCS F.S.617 Members as even in case 02-03812, Denny as Dickinson & Gibbons, P.A. allegedly represented the Corporation and the members per Denny's statement in 2003 to "alias" judge's Arnold, through 2006 to Crenshaw and per Denny's 4/5/2007 court confessions and the 9/11/2007 letter and Motion to Judge Barbas questioning when was Barbas going to issue his now proved Fraud on the Court order as Extrinsic Fraud(s) and what was the Order not yet filed per the Docket to say. Later it is learned that Barbas backdated an order in an Extrinsic Fraud attempt to "impede" any appeal of all issues. Now it appears Defendant Denny for himself and his law firm has had to admit his/their dual representation of Beck, these members for whom Townsend speaks and the Corporation Not For Profit were victims of Denny's fraudulent representations and the sham for the benefit of Beck and the Sect as this is proved violated the interests of the FBCCP/CPCS Corporation and the true members as Townsend in the 5/10/2006 transcript alleged to Crenshaw and on 4/5/07 to Barbas, but barred Townsend by their

continuing conspiracy still ongoing. Denny and Crenshaw conceded to all the (6) elements of Malicious Prosecution with “Hate Crimes” to establish the legal issues defined as Malice as written in the Second Amended Complaint they wrote, telling Townsend to be quiet and that he “could go after the others later”. Townsend since 11/1987 refused being part of McCarthy/Grant/Denny/Barbas/others et/ al. conspiracy and frauds and continues going “after the others later” in this Complaint seeking justice from the continuing actions Beck et al willfully participated in as using his alias “Senior Pastor” position for their crimes and frauds and abduction of the children from his frauds and unjust enrichment which still continue and damages still continue because of Beck and Denny and Crenshaw, named Defendants and these Others “DOE” and Plaintiffs continue to seek restitution per F.S.617.022(b) and general reliefs now that the 11<sup>th</sup> Circuit Court of Appeals ruling of 2013 was released.

6. Denny confirms Becks/Harrod’s/Grant et al’s. frauds and Malicious Prosecution actions in 01-15813, for Repeat Violence as instructed to do so by HCSO Deputies Howlett and Smoak and others and Pinellas Deputy Jeffers and by Defendant John Grant and others, but omits that Beck was in collusion with Karen Harrod Townsend and others in their filing 01-15814, For Domestic Violence as also dismissed as actions were done for frauds to Defame Townsend and thus let co-participants continue as they still do their criminal acts.

7. Denny confirms by these writings here that Townsend illegally had to

pay more than \$900 (\$924), in illegal sanctions and delayed just under a year because the information Townsend sought for the Members and should not have required Court Orders because as legally still a Member/Officer which these 2006 Documents confirmed and the information sought per the Bylaws is to be open for inspection at any time for members but for Breach of Contract by the “sect” illegally conspiring with Government defendants in violation of Florida Constitution Article 1. Section 3. and their Frauds on the Courts and frauds to law enforcers, Judge Crenshaw in error fined Townsend as a non-member for asking too many interrogatories that but for the tort/Hate Crime illegal acts of defendants deputies Howlett, Smoak, Jeffers, Grant, Denny with “alias judges” and others this information and discovery was illegally “impeded”.

The Second DCA said the Appeal was untimely because of the illegally backdated order of alias judge Barbas doing a “Fraud on the Court” and backdating his order Denny now omits but agreed in 2007. So Beck et. al. was consolidated in Townsend et al v. Gray et al.

8. Defendants points 7-15 are moot and Frauds and repetitious for delay per F.R.O.P.C 4-3.1 and Frauds on the Court as an alias officer of the courts and therefore these defendants should be found in Default and Contempt of Court and Plaintiffs request full restitution per the law.

9. As an officer of the Court any Judge knowing these facts should report all lawyers and judges herein for violation of Rules Regulating the Florida Bar and specifically Rule 4-1.13(d) Identification of Client.

10. Plaintiffs again request that this Honorable Court take judicial notice of Plaintiffs Reply to the FDLE MOTION TO DISMISS and Plaintiff's other Motions and Exhibits and include these proofs herein as proof of Plaintiffs Claims Of Facts and Matters of Law which place defendants here in Breach of Contracts and in the continued conspiracy and damages still being incurred by Plaintiffs seeking full restitution per our laws and contracts.

Respectfully Submitted by:

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was provided this day of \_\_\_\_\_ by 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](mailto:Shelley.cridlin@myfloridalegal.com); [Christina.santacroce@myfloridalegal.com](mailto:Christina.santacroce@myfloridalegal.com); [Celia.wright@myfloridalegal.com](mailto:Celia.wright@myfloridalegal.com); [khornbee@hcsotampa.fl.us](mailto:khornbee@hcsotampa.fl.us); [olindema@hcsotampa.fl.us](mailto:olindema@hcsotampa.fl.us); [FLservice@gtlaw.com](mailto:FLservice@gtlaw.com); [tramelic@gtlaw.com](mailto:tramelic@gtlaw.com); [moodym@gtlaw.com](mailto:moodym@gtlaw.com); [richardb@gtlaw.com](mailto:richardb@gtlaw.com); [lgustofik@pcsonet.com](mailto:lgustofik@pcsonet.com); [dconnolly@pcsonet.com](mailto:dconnolly@pcsonet.com); [araymond@dglawyers.com](mailto:araymond@dglawyers.com); [cdenny@dglawyers.com](mailto:cdenny@dglawyers.com); [corourke@dglawyers.com](mailto:corourke@dglawyers.com); [scruggspa@aol.com](mailto:scruggspa@aol.com); [kkharrod@gmail.com](mailto:kkharrod@gmail.com); [kjeffers@citruspark.org](mailto:kjeffers@citruspark.org) for

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**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 \_\_\_\_ DAY OF \_\_\_\_\_, 2015,  
BY ID PRODUCED \_\_\_\_\_

NOTARY PUBLIC: \_\_\_\_\_

Respectfully submitted,

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