

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

KAREN HARROD'S (Formerly Karen Harrod Townsend)

"EXPARTE MOTION TO DISMISS...RESPONDENT KAREN HARROD"

COMES NOW, RANDALL TOWNSEND, INDIVIDUAL, PRO SE, AND AS  
F.S.617.0834 ELECTED REPRESENTATIVE per F.S.617.022 and states:

1. Per R.O.C.P. 1.140, defendant has failed to state a proper  
"responsive pleading or motion" as required in 1.1140.(b).
2. Res judicata does not bar actions when it is found a party is a victim  
of intrinsic and or extrinsic fraud and or Fraud On the Court involving  
illegal collusion with alleged officers of the Honorable Court to pervert the  
outcome of a case for their own personal benefit and or to continue a  
malicious purpose as proved in the facts of these cases since 1987.

**3. It appears defendants deny all Matters of facts and Matters of Law as put forth in the complaint without themselves offering any defensive truthful facts or Matters of Law.**

**4. Plaintiffs state this alias “answer” is additional proof as to why Townsend and those for whom he speaks as the true Operation/Owner members of FBCCP/CPCS not of the “Sect”, has had to oppose and expose the illegal tort actions (including attempted Murder, Batteries on Plaintiffs, Assaults of Plaintiffs, IRS Frauds, Perjury, THEFTS, illegal abduction of children by frauds to and with alias law enforcers acting without proper Due Process and court orders, filing false reports), Multiple Bylaws violations and Collusion with the “Sect” and even illegally acting with Ron Beck, Others, and Tim Jeffers and Karen Jeffers in their attaining “officers and Principal” respective positions they self-empowered to themselves with the “Sect” and Tim Jeffers as an “alias” “Law Enforcer” in collusion with his Superior Officers and others as Defendants herein and “Others Doe”, as Tim Jeffers using his Under Color Of Law alleged “Superior Knowledge” of the law, used his “masked” uniform as a Sheriff Deputy outside of his Pinellas County Jurisdiction to leverage in Hillsborough County what he knew of criminal acts, Bylaws violations, and IRS Tax Evasion done as confessed by FBCCP Administrative Pastor Elbert Nasworthy and Senior Pastor Ron Beck in the FBCCP/CPCS required Quarterly Business Meeting of 10/1994.**

**5. Harrod to conceal her illegal actions per Federal and State laws**

**illegally in collusion with John Grant ET. AL., Ron Beck ET.AL., Lane ET. AL., as lawyers and alias “law enforcers” through current co-participant defendants and “others Doe” continues illegal collusion doing Fraud on the Court and other illegal acts as proved in these Courts and by the perjury of her own documents provided to the courts.**

**6. Said Breach(s) were brought to the immediate attention of FBCCP Registered Agent John Grant and others of “alias” law enforcers to no avail illegally still to this day in 2015.**

**7. Further, this alias “answer” demonstrates the arrogance and incompetence of the defendant that without facts demand their authority despite the code of conduct as prescribed for members per the Bylaws and Florida Statues.**

**8. Due to the conduct and talents expected of persons in her FBCCP position as a CPCS School Teacher, a higher level of competence was expected and required of candidates that Townsend and our Nominations Committee Members expected to present for consideration to the Membership for their Confirmation for that of a member and school employee and or one for fraud “acting in the Sect”.**

**9. Additionally, in Breach of the Bylaws, defendants herein resorted to tortful defamation in the same manner and words used by others of the “Sect” and of FBCCP John Grant, alleging Townsend even after being validated in matters of Facts, Matters of Law and Matters of Risks of these defendants that failed has alleged even in court filed documents in case 01-**

15814, that Townsend was an apparent mentally unstable individual and thus their reasons to in 1999, unlawfully “impede” Townsend from his children, family, Church Duties, Church Members and friends.

10. Additionally, in specific forbidden Breach of the Bylaws, defendants then in 2001, aid and abet Ron Beck ET AL and Karen Harrod Townsend to file the Sham 01-15813 (Repeat Violence) and 01-15814(Domestic Violence) Lawsuits against Townsend which Judge Palomino dismissed in favor of Townsend and also at that time in 11/15/2001 warned defendants to not “impede” with the relationship between Townsend and his children that had been as the court admitted “impeded” illegally despite the ineffective legal representation of Scruggs ET.AL or GRANT ET.AL. OR DENNY ET.AL. or GRAY ET.AL or any other defendant and Others “Doe” yet to date.

11. Therefore, Plaintiffs request this Honorable Court rule this alias “answer” is nonresponsive and rule this Defendant is in Default as a matter of law.

12. Additionally, Plaintiffs request this Honorable Court issue an order requiring Defendant Karen Harrod to be found in Contempt of Court, Pay any and all reasonable costs and fees incurred by Plaintiffs and issue arrest warrants for her multiple criminal actions.

13. Plaintiff’s request this Court take judicial notice of Plaintiff’s Response to the FDLE Motion to Dismiss and incorporate said matters herein as in additional support of Plaintiff’s causes.

Respectfully Submitted by:

Randall Townsend, Pro Se and Per F.S.617.0834  
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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; [Christina.santacroce@myfloridalegal.com](mailto:Christina.santacroce@myfloridalegal.com); Celia.wright@myfloridalegal.com; khornbee@hcsotampa.fl.us; olindema@hcsotampa.fl.us; FLservice@gtlaw.com; trammelic@gtlaw.com; moodym@gtlaw.com; richardb@gtlaw.com; lgustofik@pcsonet.com; dconnolly@pcsonet.com; araymond@dglawyers.com; cdenny@dglawyers.com; corourke@dglawyers.com; scruggspa@aol.com; kkharrrod@gmail.com; Tim and Karen Jeffers 15217 W. County Line Road Odessa, Florida 33556.

**SUPPORTING AFFIDAVIT**

BEFORE ME THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED RANDALL C. TOWNSEND, PRESENTING IDENTIFICATION, WHO UPON BEING DULY SWORN AND CAUTIONED EXECUTED AND STATED IN HIS OWN WORDS AND TOOK AN OATH THAT THE STATEMENTS AND THE THINGS CONTAINED THEREIN ARE TRUE AND CORRECT, TO THE BEST OF HIS KNOWLEDGE, INFORMATION AND BELIEF.  
WITNESS MY HAND AND OFFICIAL SEAL THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2015,  
BY ID PRODUCED \_\_\_\_\_  
NOTARY PUBLIC: \_\_\_\_\_

Respectfully submitted,

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