

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT,
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA**

CASE NO: _____
RELATED CASES: 06-6005; 05-9605
05-0911; 02-4974; 02-03812; 01-15813;
01-15814

RANDALL TOWNSEND, RANDALL TOWNSEND AS F.S. 617 Representative for
the FIRST BAPTIST CHURCH OF CITRUS PARK/CITRUS PARK CHRISTIAN
SCHOOL

PLAINTIFF(s),

v.

JOHN GRANT, Individually, JOHN GRANT, AS REGISTERED AGENT OF FIRST
BAPTIST CHURCH CITRUS PARK, JOHN GRANT, P.A.,
DAVID GEE, Individually, DAVID GEE, AS SHERIFF OF HILLSBOROUGH
COUNTY, Florida, THE HILLSBOROUGH COUNTY SHERIFF'S DEPARTMENT
(HCSO), JOE HOWLETT AS A HCSO DEPUTY, MICHAEL SMOAK AS A HCSO
DEPUTY,
THE VARIOUS MEMBERS OF THE CORPORATION d/b/a, FIRST BAPTIST
CHURCH OF CITRUS PARK, CITRUS PARK CHRISTIAN SCHOOL, A MINISTRY
OF FBCCP, DAVID FERGESON, Individually, DAVID FERGESON, AS SENIOR
PASTOR OF FIRST BAPTIST CHURCH OF CITRUS PARK, 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, MICHAEL SMOAK,
INDIVIDUALLY, 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,
MICHAEL CORBIN, Individually, MICHAEL CORBIN, AS A PASCO COUNTY
SHERIFF DETECTIVE, KAREN JEFFERS, Individually, KAREN JEFFERS, CPCS
PRINCIPAL, KAREN HARROD TOWNSEND, Individually, KAREN HARROD
TOWNSEND, AS CPCS EMPLOYEE,

GARY TERRY, Individually, GARY TERRY AS DEPUTY OF HILLSBOROUGH COUNTY, JOHN McDARBY, Individually, JOHN MCDARBY, AS HILLSBOROUGH COUNTY FLORIDA DEPUTY SHERIFF, GERALD BAILEY, Individually, GERALD BAILEY, AS FDLE COMMISSIONER, MARK OBER, INDIVIDUALLY, MARK OBER, AS STATE ATTORNEY, PAM BONDI, Individually, PAM BONDI, AS ATTORNEY”S GENERAL OF FLORIDA, JEB BUSH, Individually, JEB BUSH, AS GOVERNOR OF FLORIDA, CHARLIE CRIST, INDIVIDUALLY, CHARLIE CRIST, AS GOVERNOR OF FLORIDA, RICK SCOTT, Individually, RICK SCOTT, AS GOVERNOR OF FLORIDA, DAVID GIBBS III, Individually, DAVID GIBBS, III, P.A., DAVID GIBBS III, AS AGENT OF CHRISTIAN LAW ASSOCIATION, PATRICIA McCARTHY, Individually, PATRICIA McCARTHY P.A., DAVID H. POPPER , Individually, DAVID H. POPPER, P.A. BRUCE CHAPIN, Individually, BRUCE CHAPIN, P.A. O’Neill, Chapin, Liebman, Marks, Popper and Cooper P.A., CHARLES SCRUGGS, Individually, CHARLES SCRUGGS P.A., HEATHER GRAY, Individually, HEATHER GRAY, P.A., LINDA CHAPIN, Individually, LINDA CHAPIN, AS ORANGE COUNTY, Florida CHAIRPERSON, PAT BEAN, Individually, PAT BEAN AS AGENT OF HILLSBOROUGH COUNTY, MARVA CRENSHAW, Individually, MARVA CRENSHAW AS 13th CIRCUIT COURT JUDGE, JAMES ARNOLD, Individually, JAMES ARNOLD AS 13th CIRCUIT COURT JUDGE, JUDGE WAYNE TIMMERMAN, Individually, JUDGE WAYNE TIMMERMAN AS 13th CIRCUIT JUDGE, JUDGE GREG HOLDER, Individually, JUDGE GREG HOLDER AS 13th CIRCUIT JUDGE, ROM POWELL, Individually, ROM POWELL AS 9th CIRCUIT COURT JUDGE, JAMES STRICKLAND, Individually, JAMES STRICKLAND AS 9th CIRCUIT COURT JUDGE, CHARLES CANADY, Individually, CHARLES CANADY AS 2nd DCA and FLORIDA SUPREME COURT JUDGE, The 5th DCA and 2nd DCA and Florida Supreme Court Judges in their individual and Official Capacities, THE PINELLAS SHERIFFS OFFICE, THE PASCO SHERIFFS OFFICE, THE FDLE, CHARLES E. LANE JR. Individually, CHARLES E. LANE d/b/a AS SABAL MARKETING/SEALANE MARKETING and “OTHERS DOE”,
AS DEFENDANTS,

CIVIL ACTION FOR DAMAGES
ACTION FOR F.S.617.022 ESTOPPEL
COMPLAINT AND DEMAND FOR JURY TRIAL

COMES NOW, RANDALL TOWNSEND, INDIVIDUAL, PRO SE, AND AS
F.S. 617.0834 ELECTED REPRESENTATIVE per F.S. 617.022 and sues
JOHN GRANT, Individually, JOHN GRANT, AS REGISTERED AGENT OF FIRST
BAPTIST CHURCH CITRUS PARK, JOHN GRANT, P.A., DAVID FERGESON,
Individually, DAVID FERGESON, AS SENIOR PASTOR OF FIRST BAPTIST

CHURCH OF CITRUS PARK, RONALD L. BECK, INDIVIDUALLY; REVERAND
RONALD L. BECK, AS SENIOR PASTOR OF THE FIRST BAPTIST CHURCH OF
CITRUS PARK; (HEREINAFTER AS FBCCP); WILLIAM T. BROWN, Individually;
REVERAND WILLIAM T. BROWN, AS PASTOR OF ADMINISTRATION, FBCCP;
HERMAN MEISTER, INDIVIDUALLY; REVERAND HERMAN MEISTER, AS
PASTOR OF SCHOOL MINISTRIES, FBCCP; GARY LEATHERMAN,
INDIVIDUALLY; GARY LEATHERMAN, AS TRUSTEE, AND
DEACON AND MEMBER OF PERSONNEL COMMITTEE OF FBCCP; ROBERT
GILES, INDIVIDUALLY; ROBERT GILES, AS MEMBER OF PERSONNEL
COMMITTEE, AND DEACON, FBCCP; TIM JEFFERS, INDIVIDUALLY;
TIM JEFFERS, AS FINANCE COMMITTEE MEMBER; MARK NUNES,
INDIVIDUALLY; MARK NUNES, AS CHAIRMAN OF FBCCP DEACONS, 1999-
2000; MIKE SHUMATE, INDIVIDUALLY; MIKE SHUMANTE, AS CHAIRMAN OF
FBCCP DEACONS, 2000-; JOE HOWLETT, INDIVIDUALLY; JOE HOWLETT, AS
FBCCP TRUSTEE; GEOFF SMITH, INDIVIDUALLY; GEOFF SMITH, AS FBCCP
CORPORATION PRESIDENT AND TRUSTEE AND DEACON; DR. LON LYNN,
INDIVIDUALLY; DR. LON LYNN, AS DR LON LYNN M.D.; KAREN HARROD
TOWNSEND, INDIVIDUALLY, KAREN HARROD TOWNSEND, AS EMPLOYEE
OF CPCS; KAREN JEFFERS, INDIVIDUALLY, KAREN JEFFERS, AS CPCS
PRINCIPAL, MICHAEL CORBIN, INDIVIDUALLY, MICHAEL SMOAK,
INDIVIDUALY; THE MEMBERS OF
THE CORPORATION d/b/a FIRST BAPTIST CHURCH OF CITRUS PARK, A
FLORIDA CORPORATION; AND CITRUS PARK CHRISTIAN SCHOOL, AS A

MINISTRY OF FIRST BAPTIST CHURCH OF CITRUS PARK ,
DAVID GEE, Individually, DAVID GEE, AS SHERIFF OF HILLSBOROUGH
COUNTY, Florida, GARY TERRY, Individually, GARY TERRY AS DEPUTY OF
HILLSBOROUGH COUNTY, JOHN McDARBY, Individually, JOHN MCDARBY, AS
HILLSBOROUGH COUNTY FLORIDA DEPUTY SHERIFF, JOE HOWLETT, AS A
HILLSBOROUGH COUNTY DEPUTY SHERIFF, MICHAEL SMOAK, AS A
HILLSBOROUGH COUNTY SHERIFF DEPUTY, MICHAEL CORBIN, AS A PASCO
COUNTY SHERIFF DEPUTY, TIM JEFFERS AS A PINELLAS COUNTY DEPUTY,
GERALD BAILEY, Individually, GERALD BAILEY, AS FDLE COMMISSIONER,
MARK OBER, INDIVIDUALLY, MARK OBER, AS STATE ATTORNEY, PAM
BONDI, Individually, PAM BONDI, AS ATTORNEY”S GENERAL OF FLORIDA,
JEB BUSH, Individually, JEB BUSH, AS GOVERNOR OF FLORIDA, CHARLIE
CRIST, INDIVIDUALLY, CHARLIE CRIST, AS GOVERNOR OF FLORIDA, RICK
SCOTT, Individually, RICK SCOTT, AS GOVERNOR OF FLORIDA, DAVID GIBBS
III, Individually, DAVID GIBBS, III, P.A., DAVID GIBBS III, AS AGENT OF
CHRISTIAN LAW ASSOCIATION, DICKINSON & GIBBONS P.A., CHARLES
DENNY IV, INDIVIDUALLY, CHARLES DENNY, P.A., A. JAMES ROLFES,
INDIVIDUALLY, A. JAMES ROLFES, P.A. PATRICIA McCARTHY, Individually,
PATRICIA McCARTHY P.A., DAVID H. POPPER , Individually, DAVID H. POPPER,
P.A. BRUCE CHAPIN, Individually, BRUCE CHAPIN, P.A. O’Neill, Chapin, Liebman,
Marks, Popper and Cooper P.A., CHARLES SCRUGGS, Individually, CHARLES
SCRUGGS P.A., HEATHER GRAY, Individually, HEATHER GRAY, P.A., LINDA
CHAPIN, Individually, LINDA CHAPIN, AS ORANGE COUNTY, Florida

CHAIRPERSON, PAT BEAN, Individually, PAT BEAN AS AGENT OF HILLSBOROUGH COUNTY, MARVA CRENSHAW, Individually, MARVA CRENSHAW AS 13th CIRCUIT COURT JUDGE, JAMES ARNOLD, Individually, JAMES ARNOLD AS 13th CIRCUIT COURT JUDGE, JUDGE WAYNE TIMMERMAN, Individually, JUDGE WAYNE TIMMERMAN AS 13th CIRCUIT JUDGE, JUDGE GREG HOLDER, Individually, JUDGE GREG HOLDER AS 13th CIRCUIT JUDGE, ROM POWELL, Individually, ROM POWELL AS 9th CIRCUIT COURT JUDGE, JAMES STRICKLAND, Individually, JAMES STRICKLAND AS 9th CIRCUIT COURT JUDGE, CHARLES CANADY, Individually, CHARLES CANADY AS 2nd DCA and FLORIDA SUPREME COURT JUDGE, The 5th DCA and 2nd DCA and Florida Supreme Court Judges in their individual and Official Capacities, THE HCSO, THE PINELLAS SHERIFFS OFFICE, THE PASCO SHERIFFS OFFICE, THE FDLE , CHARLES E. LANE JR. Individually, CHARLES E. LANE d/b/a AS SABAL MARKETING/SEALANE MARKETING and “OTHERS DOE”, and alleges:

GENERAL ALLEGATIONS

1. This is an action for damages in excess of \$25,000.00.
2. At times material herein, Plaintiff resides in Hillsborough County, Florida.
3. Defendants, reside or do these actions principally in Hillsborough County, Florida.
- 4.-5. STRIKE
6. THESE MEMBERS AT LARGE OF THE F.S. 617 CORPORATION “Not for Profit” AND OTHERS WHO THEN KNOWINGLY, WILLFULLY AND INTENTIONALLY VIOLATED KEEPING TO THEIR FIDUCIARY DUTIES

TO ALLOW PLAINTIFF TO REVEAL HIS KNOWLEDGE OF THE “SECRET FUNDS” AND OTHER FLORIDA STATUE VIOLATIONS BY THE DEFENDANTS –THESE MEMBERS AT LARGE AND OTHERS BECAME CO-CONSPIRATORS AND DID EXTORT TO DAMAGE THE CHARACTER AND REPUTATION AND UNLAWFULLY ABDUCTING THE CHILDREN AND PROPERTIES OF THIS PLAINTIFF BY ALLOWING, AND BY GIVING THEIR VOTE OF APPROVAL FOR AND THEN BY PAYING FOR THE CHARGES TO BE FILED AND BY BEING WILLING TO CONTINUING OFFERING KNOWN FALSE TESTIMONY IN SAID CASE OF MALICIOUS PROSECUTION AS ACTED OUT BY RON BECK AS INDIVIDUAL AND AS PER HIS OWN SHAM TESTIMONY TO JUDGE PALOMINO ON NOVEMBER 23, 2001, SAYING “WELL, FIRST, YOUR HONOR, I’D LIKE TO TELL YOU IT’S THE FIRST TIME I’VE HAD TO DO SOMETHING LIKE THIS TO A PERSON BEFORE. AS A PASTOR I DON’T REALLY GO FOR THIS KIND OF STUFF, BUT OVER THE PAST TWO YEARS SINCE ‘99— AND I HAVE BROUGHT WITH ME A STACK OF SLANDEROUS AND FALSE MATERIALS THIS MAN HAS CONTINUED TO MAIL AND FAX TO ME AND TO MY STAFF AND TO OUR CHURCH MEMBERS. YOUR HONOR, I WOULD LIKE TO GIVE YOU A LETTER THAT HE WROTE HIMSELF ASKING THAT HIS MEMBERSHIP BE REMOVED FROM MY CHURCH, IF I MAY.” THE COURT REPLY’S, “ALL RIGHT. WELL, IN THIS LETTER DOES HE THREATEN PHYSICAL HARM TO YOU?” MR. BECK REPLY’S, “NO SIR. IT’S JUST A POINT I WANT TO MAKE THAT

HE HAS VOLUNTARILY WITHDRAWN HIS MEMBERSHIP FROM OUR CHURCH, BUT HE WON'T LEAVE OUR CHURCH ALONE.” MR. BECK LATER CONTINUES, “—VOLUNTARILY REMOVING HIS MEMBERSHIP FROM OUR CHURCH. AND AFTER THAT LETTER—BY THE WAY , IN THE LETTER HE SAYS THIS ACTION I PRAY WILL BRING CLOSURE TO OUR CURRENT DISPUTE AND PROTECT MY WIFE, CHILDREN AND CHURCH BODY FROM ANY FURTHER ACTION ON THIS MATTER.”

7. MR. BECK FURTHER ADVISES JUDGE PALOMINO, “YOUR HONOR, ALL I WANT OUT OF THIS WHOLE THING IS FOR THIS MAN TO LEAVE THE CHURCH BODY ALONE. TO DISCONTINUE STALKING ME AS HE’S BEEN DOING ON A REGULAR BASIS, AND TO BE—TO DISCONTINUE SLANDEROUS MATERIALS MAILING OR FAXING OR e-MAILING TO ME AND OUR CHURCH MEMBERS. I HAVE GOT A PILE HERE OF STUFF THAT WOULD WASTE YOUR TIME READING, BUT IT’S SLANDEROUS AND UNTRUE AND--.” AND MR. BECK ALSO STATED, “NO, ONCE AGAIN, THIS IS NOT AN INTENT BECAUSE OF HIM CHALLENGING PHYSICAL HARM, BUT RATHER FEAR, INTIMIDATION...,” BECK THEN CREATED A FRAUDULENT DESCRIPTION OF AN EVENT TO EXCITE THE JUDGE TO ORDER THE RESTRAINING ORDER AS NEEDED AND DID NOT SAY PLAINTIFF WAS INVITED TO BE AT THIS BUSINESS MEETING BY OTHER MEMBERS SO THE TRUTH COULD BE TOLD, AND MR BECK CONTINUED, “THREATENING TO BUST INTO A CHURCH SERVICE.

AND HE HAS COME ON THE PROPERTY AND WAS STOPPED BY SEVERAL USHERS (Beck/Scruggs omitted stating illegally acting Deputies) BECAUSE HE WAS GOING TO BUST INTO THE SERVICE.” IN ADDITION MR. BECK INFERS THAT HE IS THERE IN THE COURT OF JUDGE PALOMINO ON BEHALF OF THE MEMBERSHIP AT LARGE BECAUSE OF SAYING, “...LIKE I SAID, **WE’D**” (emphasis added), **“LIKE TO SEE THIS CONTINUE BECAUSE FOR THE PAST TWO WEEKS THERE’S BEEN A REAL PEACE AROUND THE CHURCH PROPERTY WITHOUT THIS THING CONTINUING AND WITHOUT GETTING THESE SLANDEROUS THINGS LIKE ON THE E-MAIL, AND MY MEMBERSHIP ALSO GETTING THEM AND ALSO TURNING THEM IN TO ME AND WONDERING ABOUT THEM AS WELL SO--.”**

7A. Defendant Karen Kay Harrod Townsend additionally willfully, knowingly and intentionally acting in collusion for herself and other co-conspirators did in her action of case 01-15814, as a Domestic Violence Action brought with the actions of Ron Beck ET AL but as cases in the hearing attorney Scruggs and judge Palomino and others acted to conceal true facts, Rights and children from Plaintiff so to continue the extortion, emotional distress, frauds and illegally unjust enrichment for themselves and others since Townsend exposed crimes of Lane(s) Et Al to attorney Patricia McCarty in November 1987 and since.

8.--10. STRIKE

11. Plaintiff also had duty as described above and herein and was asked by others to investigate and to report other acts of Negligence and Frauds and Conspiracy

and Conspiracy to Defraud when Pastors and others with Finance Committee members and trustees sought to defraud the Membership, Government Agencies and individuals, including Plaintiff's wife and minor children and Parents and even now the Courts when Defendants continue to try to allege Plaintiff is a "Liar", "Sower of Discord", "Dangerous" due to a "Stress related breakdown" and a "Stalker" or a "VIOLENT MAN. All accusations are pure frauds by Defendants to cover up their illegal conduct and violations of the BY-LAWS as attached herein and included herein as EXHIBIT ONE in an effort to allow Defendants to conceal their frauds to the membership and to the courts and government agencies including the false reports to alias law enforcement officers.

12. Stricken but for this record was/is as;

"Plaintiff was /is dutifully serving as (1), Chairman of the Long Range Planning Committee, a Church "**BY-LAWS**" appointed committee responsible for the growth and expansion of Church services and ministry projects, (2). Member of the Nominating Committee, a Church BY-LAWS appointed committee responsible for the staffing persons in leadership roles who did not violate "Code of Ethics and Morals" as stated in the **FBCCP "BYLAWS"** and "Statement of Faith" and "Commitment to Serve" and *CPCS SCHOOL HANDBOOK (*Denotes Documents drafted with/by approval of the Pastors and Jeffers) and the Florida Statues (3). AWANA COMMANDER, a Church "BYLAWS" appointed position responsible for the leadership of Leaders and Children in the ministry's care, (4.) Assistant Head Usher, a Church Appointed Position for service to the membership, (Fill in Sunday School Teacher, (6). Parent of two children now

formerly of the CPCS (7). Husband of a former Employee teach in CPCS.” And added for purposes herein Florida Youth Soccer Volunteer of the Year, 1995 as for standing and for showing of intentional malicious defamation by defendants.

12.-26 STRIKE

27. (Judge Crenshaw said “strike as to things Beck did stays others strike what is in [xxxx])
PLAINTIFF ALLEGES THAT THESE MEMBERS AT LARGE OF THE CORPORATION AS A WHOLE WHEN LEARNING IN JANUARY 2000, AT THE BUSINESS MEETING THAT PLAINTIFF WAS TRUTHFUL IN THAT UNREPORTED MONEY SHOWED UP IN THE FORM OF CERTIFICATE OF DEPOSITS AND THAT IN SAID BUSINESS MEETING RON BECK TOLD SEVERAL FRAUDS THAT WERE EXPOSED AS FRAUDS THESE MEMBERS THEN CONTINUES TO EMPLOY RON BECK, [WILLIAM BROWN AND HERMAN MEISTER] WHO CONTINUE THEIR ABUSE OF THIS PLAINTIFF EVEN BY THE WORDS SAID [IN WRITING BY THEIR ATTORNEY IN 12/2003 AND THE JOHN GRANT FACEBOOK POST OF 3/2014 AND MULTIPLE EMAILS], AND THESE DEFENDANTS KNOW THAT THEIR ENTIRE ACCUSATIONS THAT THEY BELIEVE PLAINTIFF WAS A DANGEROUS PERSON OR POTENTIALLY DANGEROUS WAS A CREATED FRAUD BY THE PASTORS AND THE TRUSTEES AND FINANCE COMMITTEE MEMBERS AND SELECT DEACONS and “Others”.

28. -29 STRIKE

30. {REMAIN BUT EXTRACT INDIVIDUALS}
Thus upon knowledge of said acts of the FBCCP PASTOR[S], acting Individually, and acting as Officer[s] of the FBCCP, these Defendants as officers

and defendants as MEMBERS AT LARGE, acting individually, and **acting as the Membership AT LARGE of the Corporation of FBCCP had an individual FIDUCIARY and a CONTRACTUAL DUTY created by the Contract language of the FBCCP “BY-LAWS” to constrain themselves and Ronald L. Beck, individual, [William Brown III, individual, Herman Meister, individual,]** and as Pastors and Trustees of the Corporation and **the Leadership of the Deacons and the Finance and Personnel Committees [including Gary Leatherman, individual, Joe Howlett, individual, Tim Jeffers, individual, Robert Giles, individual, Dr. Lon Lynn, individual, Geoff Smith, individual and Carl (Buddy) Rawls, individual]and employees Karen Jeffers and Karen Kay Harrod Townsend and all other members and prevent these actions from Still causing and inflicting intentional harm, with malice upon Plaintiff and Plaintiff’s family (still in 2015) as Defendant Ronald L. Beck and William Brown III and Herman Meister, and Gary Leatherman, individually, Joe Howlett, individually, and Tim Jeffers, individually, Robert Giles, individually and as Officers of the Corporation and others conspired to cover up the acts Plaintiff tries to report acts which violated the Florida Statutes and FBCCP Policies and Procedures as stated in FBCCP “BY-LAWS” and Citrus Park Christian School Handbook and Plaintiff is still being violated by the FALSE ACCUSATIONS CREATED by these PASTORS AND LEADERSHIP AND OTHERS as they still try to discredit and harm the integrity of Plaintiff as Plaintiff tries to still expose their ongoing un-civil acts and violations of law and violations of Plaintiff’s CIVIL RIGHTS AS THESE DEFENDANT CONTINUE**

TO PRACTICE HATE CRIMES AND VIOLATE THE UNITED STATES OF AMERICA CONSTITUTION AND OF THE CONSTITUTION OF THE STATE OF FLORIDA AS THEY PRACTICE THESE HATE CRIMES KEEPING PLAINTIFF FROM HIS CHILDREN BY THEIR FRAUDS AND LIES AND AS THEY VIOLATE THE CONSTITUTIONS THAT CLEARLY STATE THEY CANNOT USE OR HIDE BEHIND LAWS THAT TRY TO PROTECT THEM BECAUSE THE CONSTITUTIONS CLEARLY STATE “NO LAWS SHALL IMPEDE THE OBLIGATION OF A CONTRACT” AND THESE DEFENDANTS WERE OBLIGATED TO THIS PLAINTIFF TO NOT SLANDER HIS GOOD NAME AND HARM HIS FAMILY BY THEIR ACTIONS AS THEY ASSISTED THE SENIOR PASTOR AND HIS STAFF OF PASTORS AND FINANCE COMMITTEE AND TRUSTEES TO VIOLATE THE RIGHTS OF THIS PLAINTIFF BY FRAUDS AS THEMSELVES AND OTHERS VIOLATE THEIR CONTRACT OBLIGATIONS TO OBSTAIN AND PREVENT UNLAWFUL ACTIONS AND DEFAMATION TO PLAINTIFF(S).

31. In COERSION, claiming superior exclusive knowledge he gained from his hired experts Ronald L. Beck, using only the manipulated tainted information he wanted to reveal to the investigators in order to get their findings to reinforce him, inspired his wife, April Beck, and daughters Julianna Beck, Darla Beck, and other pastors William Brown, III, Herman Meister, and other members of FBCCP, Tim Jeffers, Karen Jeffers, Mike Shumate, Joe Howlett, Jackie Howlett, Robert Giles, and Gary Leatherman, Geoff Smith, Jim Bates, Carl W. (Buddy) Rawls, John Michael Corbin, Joe Kieras, Jim Leahy, Paula Powell, Tammy

Nunes, Mark Nunes, Craig Tucker, Dr. Lon Lynn, Gayle Lynn, Shawn Hopkins, Jerry Miller, Karen Harrod Townsend, David Ferguson and others, as individuals and collectively AS MEMBERS AT LARGE AS THE FBCCP CORPORATION and “Others” did and continue jointly and independently conspire to tamper with “fact finding” and “cover up” of evidence and “tamper with and intimidate witnesses” in order to Obstruct Justice and continue frauds and create Frauds against Plaintiff in order to discredit the facts Plaintiff was trying to expose per Plaintiff’s DUTIES to/for the Corporation and members who elected Townsend per the **FBCCP BY-LAWS, CONSTITUTION, POLICIES and FLORIDA STATUES** and these individuals continue to harass Plaintiff and Plaintiffs family and continue to ruin and try to ruin Plaintiff’s and FBCCP’s integrity and Plaintiff’s relationships with Plaintiff’s family and friends despite the revelations in the Land Use Hearings regarding Petition File Number SU 00-1203-KE and appeal number 01-1023 and the Circuit Court Case Number 01CA8320, as Gills Et al. V Hillsborough County and the findings thereof even by Judge Barton in 2006, confirming the positions Plaintiff as CHAIRMAN OF THE LONG RANGE PLANNING COMMITTEE, tried to warn of and advise of to the Corporation and upon the partial production of partial records sufficiently showing frauds regarding money unjustly and illegally used from Designated accounts, misrepresentations on financing reports, illegal self-dealing of corporation assets, proof of conspiracy to defraud and further proof that the actions of Deputies Howlett, Mike Smoak, Tim Jeffers were never properly nominated or voted by the membership to their positions they illegally attained

and by illegal acts conduct their activities in violation of the BYLAWS and Florida Constitution Article I. Section 3, however Ron Beck and “Others” named Plaintiff as a “liar” and “a controller” and “worrier” and **“potentially violent with guns due to a stress related breakdown”** , Stalker, Person needed to be Baker Acted, to the points that this became THE DISTRACTION BECK AND THE PASTORS AND FINANCE COMMITTEE AND TRUSTEES NEEDED TO REMOVE THE INVESTIGATION OF THEIR ACTS and as planned TO GET THE DESIRED CONSEQUENCES OF KEEPING PLAINTIFF AND HIS CHILDREN QUIET ABOUT THE VIOLATIONS BY THESE DEFENDANTS BY BECK, MEISTER, BROWN, LEATHERMAN, HOWLETT, JEFFERS, NUNES, RAWLS, DR. LYNN, KAREN HARROD TOWNSEND, KAREN JEFFERS and “Others” this threatened the Security anyone including Plaintiff’s family might have from trusting any advice that Plaintiff might provide for stating these warnings and findings IN THESE ATTACHMENTS HEREIN AND NOW ALSO Confirmed by the legal process. Plaintiff alleges that there are patterns as examples that show Ron Beck, John Grant, David Gee, Charles Denny, others ET AL when he does not get what they wants will use deceptive practices and destruction of the opponents integrity in order to manipulate his partly naïve subordinates to the point that if they do not agree with him he will turn on them and degrade them as well, not allowing them to defend themselves from his attacks and these knowingly allow these acts.

32. {BECK & CORP STAY struck individuals then changed mind—read transcript to clarify}
In coercion, Ron Beck and his pastors claiming in their pastoral roles to have

superior knowledge **instigated marriage problems in Plaintiff's marriage** while they allegedly were trying to help and then used this created deceptions in order to discredit Plaintiff from being of a moral standard to be in leadership or a competent father or husband when the wife, BECK, MEISTER, BROWN AND LEATHERMAN, JEFFERS, GRANT, GIBBS III, GILES, AND "OTHERS DOE" ON SEPTEMBER 8, 1999, BY FRAUDS illegally and in violation of the BYLAWS and Due process removed Plaintiff from leadership so Plaintiff could not continue to prove out the deceptions about the money trail and the building scheme and theft of the children's microphone and other frauds and acts of criminal negligence of Ron Beck and the pastors, that Plaintiff became aware of as in Plaintiff's roles of leadership as per POINT (12) herein and is trying to reveal to the membership by Plaintiff doing his duty to the CORPORATION to reveal the frauds by the Pastors, Karen Harrod Townsend and "Others DOE".

33. {STRIKE ALL}33-43.

44. DEFENDANTS MEMBERS AT LARGE WERE NOTIFIED BY MULTIPLE LETTERS AND EVEN THE MINUTES FROM THE CORPORATION BUSINESS MEETINGS OF THE FRAUDS BY THE CORPORATION OFFICERS AND ARE, BY THE GIL'S LAWSUIT AND THIS LAWSUIT, BEING INFORMED OF THE BETRAYAL OF THE INVESTIGATION OF THE CORPORATE OFFICERS FINANCIAL REPORTING AND FRAUD BY DEFENDANT GARY LEATHERMAN TO THIS PLAINTIFF AND TO THE CORPORATION YET DEFENDANTS AS MEMBERS AT LARGE STILL PRACTICED MULTIPLE HATE CRIMES OF

EXTORTION AGAINST THIS PLAINTIFF INCLUDING TELLING PLAINTIFF TO LEAVE PUBLIC STREETS OR PUBLIC PROPERTY AS PLAINTIFF TRIED TO REACH TO HIS KIDS AS A CONCERNED PARENT AND INCLUDING ALLOWING THE FILING BY DEFENDANT BECK OF THE CHARGES OF AS A "STALKER" WHEN PLAINTIFF HAD NEVER BEEN LEGALLY DEPRIVED OF HIS CONSTITUTIONAL PARENT RIGHTS THESE MEMBERS AT LARGE PUT THEMSELVES ABOVE THE LAW AND PRACTICED HATE CRIMES AGAINST THIS PLAINTIFF INCLUDING ATTEMPTED FALSE CHARGES TO LAW ENFORCEMENT OFFICERS IN ORDER TO HAVE PLAINTIFF ARRESTED (even 10/14) AND THESE ACTS DO CAUSE PLAINTIFF TO BE HARRASSED BY A SHERIFF DEPUTY(S) ON MULTIPLE OCASSIONS WHEN PLAINTIFF WAS INVESTIGATED ON THESE ALLEGED AND FALSE CHARGES REPEATEDLY CREATED BY VARIOUS MEMBERS AT LARGE AS THEY WILLINGLY PARTICIPATED IN THE CONSPIRACY TO KEEP PLAINTIFF FROM BEING FOUND TRUTHFUL AS THE CHAIRMAN OF THE LONG RANGE PLANNING COMMITTEE DUTIES REQUIRED PLAINTIFF TELLING THE TRUTH NOW BEING REVEALED IN THIS LAWSUIT AS PLAINTIFF WAS FOUND TO BE TRUTHFUL IN THE CASE BEFORE JUDGE ARNOLD IN GIL'S V. HILLSBOROUGH COUNTY STOPPED THE CORPORATION FROM BUILDING ON THE NEW PROPERTY AS PLAINTIFF ADVISED THE MEMBERSHIP AT LARGE AND THIS MEMBERSHIP AT LARGE ACTED WILLFULLY TO TAMPER AND MAKE

FALSE ACCUSTIONS AGAINST THIS PLAINTIFF BECAUSE THIS
PLAINTIFF WAS OBEYING THE LAWS THIS MEMBERSHIP AT LARGE
WAS TRYING TO VIOLATE BUT NOW STOPPED BY THE COURT
RULING OF JUDGE ARNOLD and Judge Barton and County Commissioners.

45. {REMAIN BUT STRIKE INDIVIDUALS}

At all times herein mentioned, Defendants and Others, Ron Beck, was the agent or employee or both of First Baptist Church of Citrus Park, and in doing the things herein alleged was acting within the course and scope of such agency and with permission and consent of his codefendant(s) and with the authority for the Defendant Membership at Large of the First Baptist Church of Citrus Park.

46. {STRIKE}46-49.

50. Defendant Ron Beck speaking as the moderator of the meeting and as a Senior Pastor and as a member of the Committee answered: "Pastor Beck-No we have not checked. We will check with legal matter to see if we would have any problems."

51. {STRIKE}

52. Defendant Ron Beck speaking as the moderator of the meeting and as a Senior Pastor and as a member of the Committee answered: "Pastor Beck- Brother Joe, as chair, can I recommend that and pass that recommendation to our Chairman of the Finance Committee and have him dig into that and find and get information for you.

53. At the time defendants made the above representations to Plaintiff, some and maybe all Defendants were aware but did not inform Plaintiff that they were not

reporting in full all monies for many QUARTERLY REPORTS , “A detailed and comprehensive report of all receipts and disbursements, balances, etc., of the Church and the Christian School,...” but implied that all reported information was truthful and complete so no Audit would be necessary because their alleged self-righteous motives to be “as pure as the driven snow” would satisfy. Some defendants of the Finance Committee review much later admitted to Plaintiff that the Senior Pastor did not believe in reporting the fact that the Corporation had several bank accounts so this committee making a statement that “that is when each and every check was written out of the church and the school for the entire year ending June 30, 1995, was looked at by at least one of the five Finance Committee members.”, may or may not have been true if the Total Committee was not privileged to know about unreported bank accounts as Defendant Herman Meister later admitted to this Plaintiff money is illegally removed from accounts.

{STRIKE 54-57}

58. {REMAIN BUT STRIKE NON PARTY}

At the time Defendant(s) made the representations herein alleged Defendant had superior and exclusive knowledge of these unreported funds because the Senior Pastor Ron Beck intended to keep secret accounts for use in personal uses and their special projects and not report these accounts being used by deceptions.

59-61. {STRIKE 59-61}

62. At all times herein mentioned, defendant RONALD L. BECK, was the agent of Defendant First Baptist Church of Citrus Park, and in doing the things herein alleged was acting within the course and scope of such agency and with permission and consent of his codefendants and with the authority for the

Defendant as Membership of the First Baptist Church of Citrus Park.

63. On or about January 23, 2000, defendant Ronald L. Beck, falsely and fraudulently represented to Plaintiff that the **FBCCP BY-LAWS stated “First of all our bylaws state that every motion of active business to be conducted in any regular scheduled business meeting must be in writing”**.

64A. Each Defendant having been fully informed knowingly, willfully and intentionally has participated individually and on collusion as individually and in their Official Capacities knowingly to fraud and damage Townsend and those for whom he speaks as proved by court orders of the 5th DCA, 11th Circuit Court of Appeals, FSCt, Judge Marva Crenshaw and others.

66.-70 Stricken

COUNT I
MALICIOUS PROSECUTION

71. Plaintiff, Randall Townsend, Pro Se, sues the Defendant, JOHN GRANT , Individually, JOHN GRANT REGISTERED AGENT, JOHN GRANT P.A. RONALD L. BECK, individually, and in his Official capacity as REVERAND RONALD L. BECK, SENIOR PASTOR OF FBCCP, DAVID GEE, Individually, DAVID GEE, AS SHERIFF OF HILLSBOROUGH COUNTY, KAREN HARROD TOWNSEND, Individually, CHARLES SCRUGGS Individually, HEATHER GRAY, Individually, MARVA CRENSHAW, Individually, JOHN MCDARBY, Individually, AND “OTHERS DOE” Individually as named and sues DEFENDANTS AS MEMBERS AT LARGE OF FBCCP AS NOTED HEREIN AND OTHERS NAMED ABOVE HEREIN AND INCLUDED HEREIN AND OTHERS TO BE NAMED AS DISCOVERY IS JUST STARTING AND WILL CONTINUE IN capacities as stated herein in the Corporation

known as First Baptist Church of Citrus Park and Plaintiff TOWNSEND sues for their defaming the First Baptist Church Of Citrus Park and Citrus Park Christian School.

72. This is an action for damages that exceed \$25,000.00.

73. Plaintiff is a citizen and resident of Hillsborough County, at all times material hereto, and resides in Hillsborough County. These Defendants all reside in the State of Florida and held positions of Officers of First Baptist Church of Citrus Park. First Baptist Church of Citrus Park is a Florida Corporation, duly licensed and organized under the laws of Florida, whose main office and doing business at 7705 Gunn Highway, Tampa Florida. Each other defendant and “others Doe” reside in the State Of Florida at all times material hereto and knowingly and intentionally were co-conspirators of the actions as stated herein and yet to be included herein pending discovery.

74. Plaintiff re-alleges all above points herein as proof of “OUTRAGEOUS AND ODIIOUS” ACTIONS BY THESE DEFENDANTS DONE WITH MALICIOUS INTENT TO ALLOW THESE DEFENDANTS TO CONDUCT THEIR FRAUDS TO THIS PLAINTIFF, PLAINTIFF’S FAMILY, THE COURTS AND TO THESE CITIZENS OF HILLSBOROUGH COUNTY AND OF FLORIDA.

75. On or about NOVEMBER 2, 2001, the Defendant RONALD L. BECK INDIVIDUAL AND AS IN HIS OFFICERS POSITION AS SENIOR PASTOR OF THE FBCCP AND AS THEIR ELECTED REPRESENTATIVE BY HIS OWN STATEMENTS PRESENTED BY HIS OWN WORDS TO JUDGE PALOMINO commenced civil preceding against the Plaintiff by filing with the Clerk of this Honorable Court, a Complaint, with Exhibits attached, a copy of which is attached hereto and made a part of hereof by reference as EXHIBIT TWO.

76. A summons was also duly issued by the Clerk of this Honorable Court, and was served, together with a copy of the Complaint and Exhibits thereto, on the Plaintiff and the Defendants in this present action. Moreover, that litigation was prosecuted to its conclusion in this Court by the Order as attached Exhibit THREE.

77. On November 2, 2001, when the Complaint referred to in the paragraph above was filed, the Defendant RONALD L. BECK individually, and in his capacity as SENIOR PASTOR OF THE CORPORATION OF FBCCP AND DEFENDANTS AT LARGE OF THE FBCCP AS THEY AGREED TO SUPPORT DEFENDANT BECK IN HIS ACTION AS INDIVIDUAL AND SPOKE FOR THEIR SHAM CAUSE INTENTIONALLY CREATED herein knew that the allegations contained in the Complaint were false and untrue; that the action was brought without probable cause; and further, that the action was instituted and prosecuted with malice and without any reasonable probability of success. Furthermore, the actions by Defendant(s) was an attempt to fraud the Court with granting a “Stalking Order” so to bar Plaintiff from investigation process and exposing facts to other FBCCP Corporation members and to the other churches and to the general public that exposed the Deceptions by Defendant Ron Beck individual and other Church members “alias officers” and “Others” and their own personal attacks against this plaintiff and his family acted against as hate crimes.

Defendant Ron Beck in the Complaint did write two fraudulent facts to the Judge to induce a “TEMPORARY INJUNCTION FOR PROTECTION AGAINST REPEAT

77A. And in willful collusion, Karen Kay Harrod Townsend, in case 01-15814, filed in concert and collusion with Ron Beck ET AL, filed a sham claim of **DOMESTIC VIOLENCE**. However, notwithstanding these facts, the Defendant(s) signed this

Complaint and caused it to be filed with the Clerk of this Court and served on this Plaintiff in this present action. These acts were performed by the Defendants and then in collusion with Plaintiffs own attorneys knowingly intentional malfeasance with the intent to injure the Plaintiff, and to bring his good name into public disgrace and disrepute, and with the further intent to with the “Stalking Order” prevent Plaintiff from coming to the FBCCP Corporation and exposing to the members the frauds and deceptions of Ron Beck, Defendant and the others named above herein and continue his frauds to Plaintiff’s wife that Plaintiff was “dangerous”, and prevent the testimony, free assembly and contact with his children “ that the action was filed with the specific and malicious intent on the part of the Defendant(s) **to coerce the Court with fraud** from his testimony and from witnesses Ron Beck tried to call who intended based on subsequent testimony intended to give false information to the “alias” Honorable Judge Palomino to induce him to grant a “stalking order” and to further keep Plaintiff from speaking to the FBCCP Corporation where Plaintiff was a member in good standing and holding the offices as in POINT (12) above herein until the Fraudulent statements and Fraudulent actions were started by this Defendant and Others when Plaintiff was attempting to report to the Members the false business statements and other misrepresentations by Reverend Ron Beck and Elbert Nasworthy as admitted publicly since October 1994 and others herein .

NOTICE of the issues of his and Others improper actions are contained herein and incorporated herein this count. Additionally, upon not gaining the “Stalking” Order or any protective court order or non visitation court order, defendants have ignored the BYLAWS and CIVIL RIGHTS Duties of Plaintiff and still to this day threaten Townsend with arrest and issued an illegal trespass warning if he returns to FBCCP and CPCS or

attempts to see his children even ignoring the parents “Fundamental Rights” findings of the U.S. Supreme Court in *Pierce v. Society of Sisters* and other cited cases even Judge Palomino’s own rulings in 2001 citing these defendants’ violations of Due Process and Civil Rights still continuing.

78. The civil proceedings filed by Ronald L. Beck, Karen Harrod Townsend and for FBCCP commenced on November 15, and terminated with the entry of this summary final judgment in favor of the Defendant therein, the Plaintiff here, a true copy of which is attached here to and it incorporated herein by reference.

79. The Plaintiff thereby contends that, in light of all facts as itemized and confirmed above, the original action brought against the Plaintiff here was (1) brought by the party that is the Defendant(s) here; (2) found to be without probable cause; (3) instituted with malice; (4) terminated in favor of the Plaintiff; and (5) found to be the action for which the Plaintiff has suffered injuries and damages.

80. Moreover, the Defendants here is unable to establish that the original proceeding was instituted and prosecuted on the good faith reliance of legal counsel; or, that the proceeding was instituted pursuant to an independent investigation by a responsible attorney of law, licensed to practice in the state; or that the Defendant is or represents, or is and agent of, a public entity or state agency that is immune from liability for causes of action in tort.

81. The circumstances under which the above-described acts were committed by Defendants constitute a wanton and reckless disregard for the Plaintiff’s legally protected rights and interests, and a willful attempt to injure the Plaintiff, **{strike punitive damages at this time to review later}**for which the Plaintiff also claims punitive

damages.

82. By reason of both the false Complaint executed and filed with malice, and various extortions and frauds, and a direct intent to injure the Plaintiff as noted above, the Plaintiff's reputation to his family and in the community where he lives and worked and served in many civic functions has been irretrievably damaged, and the Plaintiff(s) has been humiliated, frightened by his coercion with Sheriff Deputies on multiple occasions including the September 8, 1999, April 27, 2000, Deacons meeting where defendants Beck, Leatherman and Howlett alleged Plaintiff was a violent man and a liar, shamed, and intimidated, and again in July 2001, and by multiple traffic stops by Deputy Howlett and Smoak, when Plaintiff is not in violation of laws and followed on two occasions and abused even at toll booths and at the public mall and at the public post office and restaurants and threatened by alias law enforcers with trespass in 10/2007 at FBCCP and in over 5 counties especially HCSO McDarby acting illegally outside his jurisdiction on 3/31/2010, 10/10/2012, 3/13, 4/14 and by various emails to threaten Townsend and has suffered great duress in watching pastors multiple times put at risk the health of many minor children and in July, 1999, William Brown violate by an immoral act upon Plaintiff's now former wife, yet Plaintiff was called the liar for reporting such act and Plaintiff has suffered great mental pain thereby as Plaintiff was forced now for many years to watch the pain and suffering these officers and members at large as Doctor Lynn and these Howlett, Jeffers, Grants, Gee, judges and others professional actions were allegedly a cover for their own criminal acts as these conspirators do daily to destroy this family and the lives of these people and this plaintiff as they still conspire to put more people at risk who do not follow the wishes of Ron Beck and his pastors.

PLAINTIFF BECAUSE OF THE LIES STARTED BY RON BECK AND KAREN KAY HARROD TOWNSEND, Lane ET AL AND OTHERS HAS NOW NOT BEEN ABLE TO PER THEIR RIGHTS FREELY SEE OR SPEAK TO HIS KIDS SINCE 10/1999, BECAUSE OF THE LIE THAT PLAINTIFF IS VIOLENT AS THE ACTION FILIED BY RONALD L. BECK FOR HIMSELF AND THE OTHERS WAS USED EVEN OUT OF CONTEXT BY ATTORNEY TURMEL FOR THE WIFE IN THE DIVORCE CASE TO/WITH JUDGE TIMMERMAN AND OTHER JUDGES WHO RATHER THAN SHOW PROPER JUDICIAL PROCESS INSTEAD TOOK THE LIES OF STACEY TURMEL AND SCRUGS AND DID USE HER POSITIONS ON THE BECK ET AL ACTIONS AS A WAY TO ALL THE MORE HARM AND DAMAGE THIS PLAINTIFF/HUSBAND/FATHER.

82-A. Additionally, continuing actions done individually and in conspiracy continues by these defendants and “Others” in part are as follows:

1. October 2014, Townsend while trying to enter and provide more information for additional criminal charges on Defendants and “Others” and to find out the status from Detective McDarby on the location of this Plaintiffs Children illegally abducted by frauds since 1999, JDT AND JGT, at the HCSO Headquarters Visitor Station in Tampa, while standing on a public sidewalk was threatened with arrest by HCSO Detective John McDarby and two other deputies, if Townsend did not leave and prevented Townsend from reporting additional crimes McDarby, Martinez, Smoak, Gary Terry, and Others at HCSO, Pinellas, Pasco Deputies and Cindy Sanz (2004) and Others of FDLE and had promised since 1994, he or they was still investigating as Howlett and Jeffers stated

since about 1994 and Deputy Smoak since about 1999, and FDLE officers since the 1990's based on the interview done with Townsend at the Orlando FDLE office with Senior FDLE Officers and with the Florida Bar Officers since about 1993, and attorneys now even one a Middle District of Florida Federal Court Judge Presnell who stated the damages in the early 1990's were over \$121M;

2. March 2, 2014, John Grant on Facebook did knowingly and intentionally publish defamation and frauds in continuing their and "Others" collusion with Sheriff David Gee and Mark Ober did state:

“Please pray for Randall Townsend. He is confused and mentally troubled person. He needs help that he refuses to get and rejects the Christian family who gave him life.

You were arrested because you broke the law and committed a crime. I encourage you to get the mental help you so desperately need.

Randy, go take your medicine and don't write me again. You know that the sheriff has said you are not to contact or communicate with me in any fashion including Facebook. If you post anything more, I will not respond but will call the sheriff and they will take you into custody. I feel very sorry for your demented condition. You need mental help and refuse to get it. I saw your dad in church this morning and know how he and your mother grieve over their lost son.”

3. May 23-24, 2013 and since, in collusion, Defendants have refused to follow “Due Process of Law” and “Due Process of the Rules of Civil Procedure” and prohibited Townsend from filing and taking part in a process of a hearing per the R.O.C.P. the TOWNSEND v. LANE case CI89-3299, per ROCP1.540(b)(4) as defendants and “Others” continue Obstruction of Justice and Civil Rights granted by Contracts and their own rulings even using the Townsend v. Lane case cited in their 5 th DCA ruling in ROBINSON that the Townsend opinions in the legal briefs submitted in January 1993 and since to Judge Rom Powell and “others” were the correct legal process barred at that time and since by the illegal collusion

of defendants and others “DOE” being directed by the Florida Bar and FDLE and Governors to continue the frauds by Lane ET AL to conceal Lane’s illegal

Drug activities and illegal payments and extortion still ongoing;

4. November 10, 2012, John Grant did admit his directions and collusion with various defendants including by name Judge Arnold to defame Townsend to act

knowingly and intentionally in Obstruction of Justice and Civil Rights from 1994;

5. October 1994 till present, Defendants and Others knowingly and intentionally have illegally “impeded” Townsend per his duties as FBCCP Unanimously

elected “Officer” as Nominations Committee (Supreme Court) FBCCP and

Member with Contract Rights, from his investigation and inspection of FBCCP

and CPCS internal and bank records so to prove the admitted illegal uses of funds,

Designated Funds and other properties and Rights of the Membership at Large

and of the Corporation Not For Profit as Defendants and Others act for Frauds,

Unjust Enrichment and Tax Evasion Purposes as Nasworthy admitted 10/94;

6. November 1987 to present, Defendants and Others knowingly and

intentionally even after rulings confirming the legal and factual positions as

Townsend a/k/a Future Marketing with rights per the Notarized Joint Venture

Business Agreement with Charles E. Lane Jr. a/k/a Sabal Marketing per a binding

contract also as included herein as Composite Exhibit Four exposing their

collusions, frauds, illegal abduction of the Townsend children since October

1999, and their own admitted illegal acts against Randall Townsend and those for

whom he was elected to speak by the Courts: EnBanc Court of the 11th Circuit

Court of Appeals, the Florida Supreme Court, the 5th DCA and the 2nd DCA and

the Ruling of the Court of Judge Marva Crenshaw writing on May 10, 2006, in a three hour hearing most of this document as submitted as a Complaint for Damages herein, and multiple statements by these Defendants admitting Townsend's legal claims herein still conspire and "Impede" Townsend in the recovery of his withheld contract rights and monies due by his work for the Joint Venture Partnership signed and notarized on August 7, 1987.

7. Also as included herein Composite Exhibit Five of emails of John Grant with David Gee Et AL and Mark Ober ET AL showing frauds, malice and collusion with illegal acts of defendants and "Others" to obstruct justice to and damage Townsend ET AL continuing since 1987 to defame Townsend as a "Liar".

83. Moreover, the expense of defending against the lawsuit(s), both in this Court and in the Courts of Appeal, has been incurred on behalf of this Plaintiff, and the health of this Plaintiff and of the Plaintiff's spouse, children and parents and family and others has been damaged and the future expenses of trying to repair the mental duress by professional counselors that will be needed to restore this families relationships destroyed by the years of frauds by these alleged pastors and others Plaintiffs make a full claim for relief and full restitution to the fullest extent of the law from Defendants and Others Doe.

COUNT II
COUNT FOR AN ACCOUNTING AGAINST ALL DEFENDANTS

84. Plaintiffs incorporate all points above and below herein and state;

85. Plaintiffs seek full discovery and review of all records of business transactions of or between defendants and others "Doe" as may be related to monies owned by Plaintiffs and owed to Plaintiffs.

COUNT III

COUNT FOR UNJUST ENRICHMENT GAINED BY FRAUD

86. Plaintiffs incorporate all points above and below herein and state;

87. Defendants without cause, authority or permission by various frauds, frauds under color of law unjustly have obtained the monies, rights and property of Plaintiffs for which Plaintiffs seek full recovery, reimbursement, restitution and reliefs to the fullest extent of the law.

COUNT –IV TORT INTERFERENCE WITH CHILD CUSTODY AND ASSEMBLY

88. Plaintiffs incorporate all points above and below herein.

89. Various Defendants without lawful cause for and by frauds and extortion have acted in collusion since 11/1987 have acted for themselves and in collusion to defame the reputation of Townsend and since September 8, 1999, intentionally, willfully, knowingly and recklessly “Impeded” and delayed the lawful Right of Townsend to assemble with his children even in our Church and school services, worship and assembly practices as guaranteed by the U.S. Supreme Court as 14th Amendment Rights.

90. Additionally Defendants without lawful cause but for frauds and extortion have removed and abducted against their will J.G.T age 14 and J.D.T age 16 at said time of October 1999, from their safe home and defendants continue as of this date unlawfully to threaten, extort and fraud Plaintiff and his children in order to defendants and others “Doe” to continue their “Impeding” and confirmed by court orders their illegal acts.

91. WHEREFORE, Plaintiff demands trial by jury on all issues so triable and prays this Court will award damages against all Defendants and arrest warrants against each defendant as above herein and “Others Doe to be named” for their unlawful intentional infliction of emotional distress by their conspired “torts of outrage” abuse and

abduction of children to conceal their unlawful thefts of a F.S.617 church/school designated funds by frauds and extortion for their own unjust enrichment to conceal their years since 1987 violations of law to conceal the criminal actions of Lane ET AL and including court costs and any other and further relief as the Court may deem proper.

Certificate of Service

I hereby certify that a copy of the foregoing was provided this day of 2/27/15 by hand delivery to the Clerk of the 13th Circuit 800 E. Twiggs St Tampa Florida 33602.

And by U.S. Mail;

John Grant 10025 Orange Grove Dr. Tampa, Florida 33618

David Gee P.O. Box 3371, Tampa, Florida 33601

Mark Ober 419 N. Pierce St Tampa, Florida 33602

Marva Crenshaw 1005 E. Memorial BLVD Lakeland, Florida 33802-0327

Pam Bondi Capital Tallahassee Office PL-01, The Capital Tallahassee, Florida 32399

Rick Scott Capital Tallahassee Office PL-05, The Capital Tallahassee, Florida 32399.

and other Defendants via their last known attorney DICKINSON & GIBBONS, P.A.

ATTORNEYS AT LAW, 401 North Cattleman Road, Suite 300, SARASOTA,

FLORIDA 34232.

SUPPORTING AFFIDAVIT

BEFORE ME THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED RANDALL C. TOWNSEND, PRESENTING IDENTIFICATION, WHO UPON BEING DULY SWORN AND CAUTIONED EXECUTED AND STATED IN HIS OWN WORDS AND TOOK AN OATH THAT THE STATEMENTS AND THE THINGS CONTAINED THEREIN ARE TRUE AND CORRECT, TO THE BEST OF HIS KNOWLEDGE, INFORMATION AND BELIEF.

WITNESS MY HAND AND OFFICIAL SEAL THIS ____ DAY OF _____, 2015,

BY ID PRODUCED _____

NOTARY PUBLIC: _____

Respectfully submitted,
Randall C. Townsend, Pro Se and
Per F.S.617.0834
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FOR "ALL" PLAINTIFFS
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