

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

CASE NO. \_\_02-03812\_\_

RANDALL TOWNSEND,  
PLAINTIFFS,  
vs.

DIVISION: K

RONALD L. BECK, INDIVIDUALLY, REVERAND RONALD L. BECK, AS SENIOR PASTOR, FIRST BAPTIST CHURCH OF CITRUS PARK, (FBCCP) WILLIAM T. BROWN, INDIVIDUALLY, REVERAND WILLIAM T. BROWN, (FBCCP) AS PASTOR OF ADMINISTRATION, GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE, (FBCCP) ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, (FBCCP) TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER, MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000 (FBCCP) MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMANTE, AS CHAIRMAN OF DEACONS, 2000-2001. (FBCCP) JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE, (FBCCP) GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS CORPORATION PRESIDENT, (FBCCP) THE MEMBERSHIP AT LARGE OF d/b/a, FIRST BAPTIST CHURCH OF CITRUS PARK, AS DEFENDANTS,

---

**PLAINTIFF RANDALL TOWNSEND'S AFFIDAVIT  
IN SUPPORT OF MOTION FOR CONTINUANCE  
AND  
AFFIDAVIT OPPOSING DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT**

STATE OF FLORIDA  
COUNTY OF HILLSBOROUGH

I, Plaintiff Randall Townsend, being first duly sworn according to the law by the undersigned authority, state as follows:

1. I am Randall Townsend, Plaintiff in the above titled action. I am fully competent to make this affidavit.

2. I, Randall Townsend hereinafter as Plaintiff state that these facts establish that there exists genuine issues of material facts requiring a trial on all these matters as follows and state:
3. I, have personally read and acknowledge Florida Statues TITLE XLVI Crimes CHAPTER 775.03 which states, “Benefit of clergy—The doctrine of benefit of clergy shall have no operation in this state”.
4. I, Plaintiff, Having exhausted all known reasonable options to correct the frauds of Beck, Howlett, Leatherman and Meister and others in the “SCHISM” using the omissions of truthful disclosure by the wife, Karen Harrod Townsend, being under intentionally fraudulent marriage counseling by Beck, Meister and Leatherman to build up and promote marriage problems and use this as extortion on this plaintiff and on his wife also as an employee at the Citrus Park Christian School(CPCS) and the children J.D.T and J.G.T as students in CPCS because these men had a “scheme” to do corruptive acts within the FBCCP Corporation to filter money to their own projects who now being warned in 1995-2006(current) was and is a failure and pockets by evidence of their nepotism hiring practices and pay packages and in this “schism” build up more voters for this failure of a building plan.
5. This is an action filed April 25, 2002, by this PRO SE, as artfully and as in full compliance with all the law as known as possible at that time and still at this time as PRO SE, Randall Townsend alleges that at the directive of these following religious groups, (Idlewild Baptist, First Baptist Church of Citrus Park members, Tampa Bay Baptist Association who said they had no authority to correct the

wrongs of Beck unless court intervention) and after requesting the SCHOOL BOARD OF CPCS use the SCHOOL HANDBOOK rules of ARBITRATION to stop the abuse on my children as students as witnessed by the expert opinion of Dr. Santiago Hoyos confirming Dr. Lon Lynn was negligent and as was the mother and the School and Church and this option was rejected by the SCHOOL BOARD STEERING COMMITTEE in a letter of April 12, 2002, from attorney Drew A. Gardner and upon this, Plaintiff was directed to seek the services of an attorney again and former Judge Charles Scruggs III, Esquire was hired and retained during 2000 through 2003, to provide truthful unbiased legal services and representations for the clients but was doing:

- A. Fraud to this his clients this PRO SE and the Minor Children of Plaintiff, J.D.T and J.G.T, saying the clients in 2000-2003, did not have legal causes of actions as matters of law
- B. Direct and Indirect Intrinsic and Extrinsic Fraud to the courts of Judge Palomino, Judge Arnold, Judge Timmerman, Judge Gomez, Judge Sierra, and to the Second District Court of Appeals and to the court of Judge Marva Crenshaw based on Scruggs legal answers to my questions of law
- C. Obstruction of Justice
- D. Tampering with Witnesses
- E. Intentionally misleading this PRO SE by this fraud of not revealing his personal convictions and by his fraud of doing unethical and illegal statements to Judges and to this PRO SE to hid the bias and personal convictions “to not make a church look bad” and thus cover and conceal reports of illegal past and new conduct done

by the First Baptist Church and Citrus Park Baptist Church members and family members of the wife now former wife of Plaintiff Randall Townsend PRO SE herein and failing to do discovery to support the claims of the clients in order to fraud and mislead this PRO SE to protect the personal convictions of Attorney Charles Scruggs, III, “to not make a church look bad” and this fraud of these personal convictions which this PRO SE alleges was vital to knowing if and that bias was a grave element to receiving true legal advice and care and not prejudiced representation and legal advice that was not revealed in order to protect the personal convictions not revealed from 2000-2003,

*F.* Fraud to state this Plaintiff did not have rights to the Corporation records and the illegal actions proofs of the trustee’s and pastors using either direct or derivative court proceedings to gain these Business records of a §617 Florida Statutes NOT FOR PROFIT CORPORATION and to show how money was being used illegal to the laws and not being reported per the laws as a former Trustee Jim Kerns had asked me to “stay on the trail” of the money issues when he was required by his job in management for the U.S Postal Service to be relocated and I assisted others requests to find the missing money that Herman Meister even partially reported from hidden accounts in the Fall of 1997, as stated in the BY-LAWS minutes when the new property at 18105 North Gunn Highway and the Church Budget came up over \$100,000.00 short and the school funds hidden in non reported accounts were revealed to the surprise of many people but this Plaintiff addressed this action as fraud.

G. Fraud and Conspiracy with and to Attorney Heather Gray, retained in 2003-2004, by this Plaintiff PRO SE, Randall Townsend, to represent at first just “the appeal” of case 02-4974, but then after the Ruling of Judge Gomez and Attorney Standford Solomon that she was not under the law to be just “half in” Gray was hired to protect “all rights of this PRO SE and the marital children J.D.T and J.G.T” which Plaintiff said would include TOWNSEND v. BECK, 02-03812 but attorney Heather Gray immediately became argumentative and Plaintiff PRO SE alleges this was for her to not reveal the fraud of attorney Charles Scruggs and the resulting damages from these actions by Charles Scruggs tainting and doing frauds to these Judges stated herein which resulted in RULINGS, ORDERS and JUDGEMENTS that are not within the Laws of this State

H. Acts to sacrifice the rights of his clients as Plaintiff Randall Townsend and the Townsend children then as minors herein as J.D.T, as son and J.G.T, as daughter of this Plaintiff Father Randall Townsend just to limit his liability of his actions.

6. The Complaint filed April 25, 2002, alleging SLANDER, LIBEL, THEFT, CHILD ABUSE, FRAUD, BREACH OF FIDUCIARY DUTY, for Malicious Prosecution brought by Plaintiff for the injuries and damages that were sustained by the actions of Defendant Ronald L. Beck and his co conspirators to:

- A. Breach His Fiduciary Duty as a Pastor to the general members
- B. Breach His Fiduciary as Senior Pastor of the FIRST BAPTIST CHURCH OF CITRUS PARK Corporation and to the management duties of the corporation and his staff and volunteer workers

- C. Breach His Fiduciary Duty as one who held himself out as a marriage counselor
  - D. Breach His Fiduciary Duty as Senior Pastor of CITRUS PARK CHRISTIAN SCHOOL to this Plaintiff, Plaintiff's marital children, as son J.D.T and daughter J.G.T and wife Karen now the former wife and do fraud to the court
  - E. Breach by Beck and Herman Meister and the mother and many School Employees of the By-LAWS and CPCS HANDBOOK in the abuse of J.D.T and J.G.T confirmed by the doctors reports of Dr. Santiago Hoyos and Dr. Ernesto Millan.
7. Plaintiff states that the FIRST AMENDED COMPLAINT, filed July 2, 2003, alleged multiple violations of Florida Statues and these causes of actions: COUNT ONE, BREACH OF DUTY FRAUD BASED ON PROMISE MADE WITHOUT INTENT TO PERFORM; COUNT TWO, BREACH OF DUTY FRAUD BASED ON PROMISE MADE WITHOUT INTENT TO PERFORM; COUNT III, BREACH OF DUTY ON PROMISE MADE WITHOUT INTENT TO PERFORM; COUNT IV, INTENTIONAL MISREPRESENTATION OF FACT; COUNT V INTENTIONAL RECKLESS INFLICTION OF EMOTIONAL DISTRESS; COUNT VI, MALICIOUS PROSECUTION; COUNT VII (no count misnumbered); COUNT VIII, ACTION FOR PROFESSIONAL MALPRACTICE AGAINST DR. LON LYNN M.D. INDIVIDUALLY AND DR.LON LYNN M.D. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND NEGLIGENT CARE; COUNT IX, NEGLIGENT SUPERVISION AND RETENTION and sought damages in full for each cause of action.
8. Plaintiff states that I have personally read over 4000 appealed cases at minimum read the following cases and Florida Statues and allege that this action is warranted per

Florida law in the GENERAL CIVIL DIVISION and NOT FAMILY LAW COURTS OF THIS CIRCUIT as FAMILY AND GUARDIANSHIP ISSUES WERE AND ARE AT ISSUE AND THESE FAMILY LAW JUDGES HAVE REPEATEDLY IGNORED THE MULTIPLE POLICIES OF FAMILY LAW RULES AND PROCESS AND THE APPEALS COURT DEMAND AND REPRIMAND OF LOWER COURTS MANY TIMES THAT GUARDIANSHIP AND CHILD ABUSE CASES MUST BE HANDLED WITH EXTREME CARE AND MOST EXPEDITIOUSLY AND THIS FATHERS REQUESTS AND PROPERLY FILED COURT PAPERS HAVE BEEN REPEATEDLY IGNORED AND ABUSED IN THIS FAMILY COURT SYSTEM OF HILLSBOROUGH COUNTY and request the court to take judicial notice of:

- A. **MEIER v. JOHNSTON** 110 Fla. 374 “...For it is conceivable that in a proper case even a single party as Representative of the whole membership may sue or defend for the whole.” When the Corporation becomes entangled with those in power who are already in fraud and violations and Breach of Duty to the Contract called a BY-LAWS and then these in this “SCHISM” allege false discipline charges to remove a BY-LAWS honoring and enforcing member then removed by the hands of the “schism” deviants (in this case using even the frauds to and of an in house Sheriff Deputy Joe Howlett, also a Corporation Trustee protecting himself from criminal charges and a Finance Committee member Tim Jeffers also a Pinellas County Sheriff Deputy in conspiracy) then “Direct” action may not been possible to uncover the crimes of the “schism” but DIRIVITAVE action may be through the courts as the

only option to expose the criminal actions and frauds by those in majority control of a NOT FOR PROFIT CORPORATION who involuntarily remove a member trying to expose the abuse of the Corporation.

(1) While this Plaintiff was removed by Beck on September 8, 1999, when Beck was told by this Plaintiff “if you take these keys, then you are telling me you do not want the truth (exposed)” and at that time Beck reached over the conference room table and took the key ring of over 25 keys from laying on top of Plaintiff’s Bible and pages of notes, even the private keys of this plaintiff that were never returned from the key ring and told Plaintiff to leave that he was done with this, Plaintiff states this was by non-BY-LAWS approved or §617.0601(5) Florida Statutes means of process per the rules as Plaintiff had been a Nomination member approved, Deacon approved, and voted by the General Membership per these BY-LAWS to do the duties of these positions and Beck did not have authority to do his acts to conspire to cover up his criminal acts and the acts of his “schism”.

(2) It was abuse to let the defamation alleged by Pastors and Sheriff Deputies acting under the cloak or “color of uniform” of their alleged professional positions (clergy or Sheriff deputy) while using these positions to achieve a criminal purpose of multiple acts Breach of Duty to the BY-LAWS and the CORPORATION per §617.0831 & 617.0834 Florida Statutes §39; §827 Florida Statutes and Statutes 895; 812; 817; 836.05; 837; 838; 843; 896; 914.22; 914.23 Florida Statutes and others leading to the acts to do fraud to and on the Judges of a court, while they alleged this Plaintiff was the criminal

leading to total public disgrace and using marriage counseling issues creating fraud to promote to a religious group that led to the killing of this Plaintiff's family and marriage and honorable reputation by fraud.

**(3)** It was §617.0834 and §39 Florida Statutes abuse on the minor marital children J.D.T and J.G.T to allow employees of the FBCCP and CPCS and students and parents by the deceptions of this "SCHISM" to use abuse, retaliations, extortion's, conspiracy, malpractice abuse by a professional medical doctor Dr. Lon Lynn violating his duties under per §458 Florida Statutes and §415 Florida Statutes and §768 Florida Statutes

**(4)** It was then fraud on the court and abuse of process and malicious prosecution and conspiracy and many other tort acts to file a false affidavit, October 31-November 2, by Ron Beck the leader of this "SCHISM" and then on behalf of Meister and Howlett and the wife, Karen Harrod Townsend using her false affidavits, November 2-15, 2001, and filing false information to the courts alleging "mental disorders" while this "schism" omitted truthful disclosure that they had freely interviewed medical professionals who had consulted with this Plaintiff and agreed with the findings of this Plaintiff and attending the Hearing on November 15, 2001, also using testimony the wife under fraud and extortion and abuse by the pastors and the "schism" was told to say by Beck, Meister and Howlett giving false legal and marital advice, to come into the court of Judge Palomino with the pure intent to allege false charges against this Plaintiff as stated herein.

**(5)** This position holds true throughout all of FLORIDA JUR CHAPTER 71 BUSINESS ORGANIZATIONS ASSOCIATIONS AND NON PROFIT CORPORATIONS and §617 Florida Statutes and §607 Florida Statutes. When this “SCHISM” to cover up their §617 Florida Statutes “criminal acts” and festered their false “dangerous” and “suffering from a stress related breakdown” and “marital abuse of the wife and children” and “unruly” and “a liar” and “a stalker” and running from the law as a criminal these “SCHISM” members in leadership turned the entire original supporters of this HONORABLE member as a LEADER in multiple positions to help FIND THE MISSING MONEY IN SECRET ACCOUNTS and STOP THE EMPLOYEE UNFAIR ABUSE BY BECK, MEISTER and the PERSONNEL COMMITTEE and tell the TRUTH ABOUT THE MASTER BUILDING AND EXPANSION PROGRAM this Plaintiff became the sole target of the “SCHISM” when Dr. Berry and others resigned and moved away to get out of harms way of Beck and unknown at the time the scheme of Beck, Meister, Howlett and Leatherman and Jeffers, not still fully understood until discovery is started as first requested in this Lawsuit in April 2002, sought to prove the criminal acts by these Corporation leaders also acting as Sheriff Deputies.

B. **Specifically FLORIDA JUR CHAPTER 71:13** gives this member as alleged the right to prove the actions by the DIRECTORS, MANAGERS AND TRUSTEES may “have failed to perform their duties; breached their duty; violated a criminal law; a transaction from which the director, manager or trustee derived, directly or indirectly improper personal benefit; an unlawful

distribution; a conscious disregard for the best interest of the corporation or willful misconduct when the action is by a member; or, in an action by someone other than the corporation or a member, recklessness or omission committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety or property” Quoting from §617.0831 and 617.0834 Florida Statutes.

C. **MT.OLIVE PRIMITIVE BAPTIST CHURCH OF JACKSONVILLE v.**

**HARRIS** 860 So2d 520 (Fla. App. 1 Dist 2003) Individual right to sue in Derivative tort basis the pastor.

D. **PELLEGRINI v. WINTER** 476 So2d 1363 (Fla. App. 5 Dist. 1985) right to

sue any and all parties who assisted in the filing of false legal civil or criminal actions that were malicious prosecution or right to redress all causing the damages and harm would be lost to or by a victim of the malicious or criminal false allegations and in this case these defendants did allege a criminal charge of “stalking” and “abuse” and “lunacy” and Beck stating “statements are a lies, inflammatory and accusational. The Deacons are very concerned” and use of fear tactics by stating “He watches us through Binoculars” and “he continually waits for me...” and “Randy has come on more than one occasion to my oldest daughter’s place of employment and made costic remarks frightening her causing her to call me because she is nervous” and these statements were per the verified affidavit of October 31, 2001 of Beck out of context and pure frauds to the court and Beck had the now former wife to testify in her separate yet tried to enjoin case in the hearing 01-15814, as the

wife and as his employee to state in her affidavit “Due to the Respondents continual stalking, I feel the potential for violence is greatly increased” and had her by fraud list the place of employment as “Word Of Life” a place that during this injunction period was a Church outing involving my kids just so Beck and his “schism” persons could not see me as I had tried to be a dad to my kids at these events traveling to Jacksonville, Florida, Saint Petersburg, Florida and though out central Florida to school and church events for my kids and this BECK and his “SCHISM” were having to answer questions of members and parents of FBCCP and CPCS, “HOW IS THIS MAN IN ANY WAY VIOLENT AND WHAT DID HE EVER DO WRONG?” and BECK did his court actions because he had no honest answer to give these persons who for now all this Plaintiff’s life knew Plaintiff was a honorable father, dad, husband, civil leader, church leader, “1995 Florida Youth Soccer Volunteer of the Year” and a State of Florida Security Officer and of all things an honorable reputation of a family for many generations. So Beck was being forced to reveal the damages he alleged to know as a “pastor” trying to keep secrets his own criminal acts and blaming these acts on this Plaintiff greatly damaging this Plaintiff now since 1995, by his false charges in order to continue his criminal acts and deceptions to the courts and using child abuse in his violations of the rules of the Florida Statues and the Corporation BY-LAWS.

- E. **LeGRANDE v. EMMANUEL** 889 So2d 991 (Fla. App. 3 Dist. 2004) just discovered by Plaintiff in April 2006 but aligns with Plaintiff allegations of

right to sue church members for statement of church matters for slander, slander per se, intentional infliction of emotional distress, negligent infliction of emotional distress and loss of consortium and this did not interfere with “ecclesiastical law” issues and cites MALICKI v. DOE 814 So2d 347 (Fla. Sct. 2002) and DOE v. EVANS 814 So2d 370 (Fla. 2002) per the positions this Plaintiff has argued since first learning the cases and positions argued and presented to this court by Attorney Denny were rulings used by this court from positions of the arguments of the DCA Denny used and knew were QUASHED and he still did intentional fraud to the court as the transcript shows his argument was and the rulings of this court reflect old cite numbers in September 2003, through now when these rulings were from the Supreme Court of Florida in March 2002, a month before Plaintiff filed his ORIGINAL COMPLAINT claiming “slander” and other charges per Florida Statute Violations including those found in § 617 Florida Statutes and 914 Florida Statutes and other statutes as listed in the Complaint as much as this Plaintiff could sufficiently do at that time based on the harassment and stalking of Howlett and others preventing this Plaintiff from records that now Attorney Denny has taken up the charge to keep from this Plaintiff and this court.

- F. Beck made criminal slander comments to ruin this Plaintiff and by this fraud instructed on September 8, 1999, the Sheriff Deputy Howlett and Jeffers to protect him and all members and on September 8, 1999, pulled the wife from her teaching class and caused fear in her and the marital children and on September 9, 1999, advised all employees and teachers to be alerted about this

dangerous man and call Beck or Meister or the office immediately and stay away from this alleged “dangerous” and “potentially violent” and “unruly” (in letter of June 16, 2000) and “molester” in 2003 and in the private Deacons meeting (April, 2000) had Howlett there as a Sheriff Deputy just to create fear in these other Deacons that this Plaintiff was ready to pull a gun out of his briefcase when Howlett yelled at this Plaintiff “get your hands on the table” when this Plaintiff reached to the floor towards his briefcase to get my Bible where I had placed a page of written notes to address to the Deacons in that meeting allegedly of unbiased fair men still seeking the truth but were frauded just as this plaintiff by the collusion of Beck, Howlett, Jeffers, Giles, Meister, and Leatherman and Schumate trying to destroy the integrity of this Plaintiff to get the truth exposed to all the still naïve deacons in said meeting that resulted in these false allegations not being exposed to the Church members this Plaintiff was not notified at all to address that he was being voted out based on fraud charges by Beck and approved by Leatherman, Howlett and Meister that now there words are proved to be fraud. Plaintiff even to attend the May 2001, Graduation Service of his son, J.D.T had to threaten legal action for the right to attend and stated I would bring my own Sheriff Deputy as a body guard to sit in the balcony with me just so I could see my son graduate from the Private School and did attend the Ceremony only but heard Beck assault me by his words at the close of the service. These words of assault of my character were meant for over 500 people to hear and prevented me from attending the reception for the Graduates that immediately followed

the service. I had to sit alone in a car parked across the street while other family tried to celebrate my sons graduation. Needless to say this was a abuse to me and my son because of the frauds of Beck and Meister and Howlett posted as a guard to watch my every move for all to watch him humiliate this person they identified as a criminal child and wife abuser. Even the affidavit of the now former wife, Karen Harrod Townsend, used by her and Ron Beck on November 15, 2001, in the court of Judge Palomino show evidence of harassment and abuse and refusal to let me attend School functions that all parents were invited to attend but my presence was told to be unsafe because of my label placed by Howlett and Beck and Meister as an abuser and dangerous! These pastors, trustee's and sheriff deputies have been proved to now be the thieves and the frauds and the liars, and nothing this Plaintiff they had alleged was true and now after almost 11 years the "scheme" started by Beck and Meister has been proved to have been a "scheme" to damage this Plaintiff so their crimes could continue.

G. **SALIT v. RUDEN, McCLOSKEY, SMITH, SCHUSTER, & RUSSEL, P.A.**

742 So2d 381, 388 (Fla. 4<sup>th</sup> DCA 1999)

H. **McALISTER v. SHAVER** 633 So2d 494 (Fla. App. 5 Dist. 1994) Fathers rights without interference due to actions by Beck and Co-conspirators

I. **DOE v. DORSEY** 683 So2d 614 (Fla. App. 5 Dist 1996) Abuse by Priest on child.

J. FLORIDA STATUES CHAPTERS 38: 39: 61: 617: 623: 741: 768: 772: 775: 827: 837: 914 and many others as stated throughout herein.

9. Plaintiff states that per the continuing damages and intentional acts of each defendant:
- A. that Plaintiff should be under these laws be allowed to AMEND again these full pleadings and to list all additional causes of actions and requests for all damages incurred under the laws of Florida.
  - B. That Plaintiff be allowed to Supplement these Pleadings for all causes of actions and requests for all damages
  - C. That Plaintiff be allowed to add additional Defendants for additional causes of actions and requests for all additional damages
  - D. That Plaintiff be allowed to add a CLAIM FOR PUNITIVE DAMAGES for all DEFENDANTS, existing, past and new due to the conforming to the true evidence of this case and the proven fraud by attorneys on the merits of this case in full.
10. Plaintiff is the nephew of the late Reverend Floyd Tyson a pastor who in the 1940's being "Ordained" was a founding sponsor pastor of what is now the FIRST BAPTIST CHURCH OF CITRUS PARK with a ministry known and doing business as CITRUS PARK CHRISTIAN SCHOOL hereinafter known as FBCCP and CPCS, respectively.
11. Plaintiff states that the FBCCP was duly formed as a "FLORIDA NON-PROFIT CORPORATION" and was and is to operate per the **FIRST BAPTIST CHURCH OF CITRUS PARK BY-LAWS CONSTITUTION POLICIES** dated "approved by the Deacon Body January 9, 1992. Approved by the Church in Quarterly Business Meeting January 19, 1992. Revised Policies Approved by Church Vote April 4, 1993." hereinafter known as **BY-LAWS**, as attached as EXHIBIT TWO, in the

**SECOND AMENDED CIVIL ACTION FOR DAMAGES AND DEMAND FOR JURY TRIAL**, as per the direction of this court was filed on April 19, 2004. This

EXHIBIT TWO, was the full document and understanding of the written agreement as a written contract by these parties during the events of 1990's through these issues of this dispute.

12. Plaintiff states that a newly revised BY-LAWS, was later created by the Defendants, however, Plaintiff states that this Plaintiff due to being "chased" and "stalked" by Sheriff Deputy Joe Howlett, using his positions as a Sheriff Deputy and as a Trustee for the Defendant Corporation did not allow this Plaintiff as a member of the Corporation to visit in any meeting to discuss these revised BY-LAWS and Plaintiff was denied the right to have any form of vote or discussion of these revised BY-LAWS and Senior Pastor Ron Beck and SHERIFF/ TRUSTEE Joe Howlett and Gary Leatherman as Trustee and Finance Committee Chair and Personnel Committee Member had motive and greatly benefited by keeping this Plaintiff from any and all business meetings of the Corporation while these new BY-LAWS were being formed and approved and while any new financial disclosures or while building projects were being reviewed and voted on by the Corporation.
13. Plaintiff states that any and all revised BY-LAWS of the Corporation never have been given yet to this Plaintiff despite multiple requests for production of these documents now since the beginning of these disputed matters in the 1990's and that these new BY-LAWS are needed evidence to prove the issues of conspiracy and corruption being attempted by Ron Beck, Joe Howlett, Gary Leatherman, Herman Meister, Geoff Smith, Dr. Lon Lynn and other corporate officers and members.

14. Plaintiff states that as a young child at the age of 10, I, became a member of the FBCCP via the baptism steps as required by BY-LAWS “ARTICLE III (Membership) ... Sec. 1. Admission by Baptism” into the membership of the FBCCP.
15. Plaintiff states that sometime thereafter while attending Temple Heights Christian School a ministry of Temple Heights Baptist Church, I moved my membership to the Temple Heights Baptist Church but returned by membership by letter per BY-LAWS “ARTICLE III (MEMBERSHIP)...Sec. 2. Admission By Letter and Sec. 3. Admission by Statement” to the FBCCP from the Tampa Bay Baptist Church in the early 1990’s and was accepted by BY-LAWS required unanimous vote of those present at that service.
16. Plaintiff states that my wife at that time KAREN HARROD TOWNSEND, and daughter, J.G.T and Son, J.D.T did join FBCCP on the same day as Plaintiff did per Sec. 2 and Section 3. As stated herein.
17. Plaintiff states that upon rejoining my membership that shortly thereafter, Per “BY-LAWS ARTICLE III. Sec. 4. NEW MEMBERS” both my wife and I attended the New Members class, as the last class taught by the departing now former pastor of FBCCP, Dr. Harold Warner and also plaintiff received accommodation from Dr. Warner as the Pastor for Plaintiff’s understanding and loyalty and conformation to the principles and teachings of Dr. Warner of the points as stated in these BY-LAWS. This accommodation from Pastor Warner as stated by him was that he felt he would be leaving the Church in good hands of people like this Plaintiff.

18. Plaintiff states that upon rejoining my membership that shortly thereafter, several Deacons, members and Pastors requested I take over and serve in these positions of leadership as stated in the **FBCCP "BY-LAWS CONSTITUTION POLICIES"** known as 1. General Member; 2. Deacon; 3. Long Range Planning Committee; 4. Awana Commander; 5. Church Council; 6. Nominating Committee member; 7. Sunday School Council; 8. Usher; and at which time I accepted and was by Nomination of the Nominating Committee and approved by the Church membership vote agreed to serve and voted in all positions as stated above herein but only declined as the position of Deacon due to my belief that these other positions of service where (1) almost to the point of overload and (2) that in my role in these other positions of service by also being a Deacon this may create a bias or prejudice for any vote of the Deacons as my role as Long Range Planning Committee member became voted in the leadership of that committee as Chairman of the Long Range Planning Committee and also as a Nomination Committee Member and as Awana Commander, I saw my right and role to address the Deacons as necessary for the consideration of all matters as necessary to present my case and leave the vote to independent others as Deacons to operate per their Contract or BY-LAWS duties.

19. Plaintiff states that I did not anticipate that as I know now not being then allowed to be in the Deacons room at all times of a meeting on these issues that I presented that then this allowed others who had positions of bias and conflict like Ron Beck, William Brown and Herman Meister and Gary Leatherman and Joe Howlett as a Trustee and Tim Jeffers as a Deacon to give testimony contrary to the true facts as presented by this Plaintiff in their attempts to use bias, deceit and trickery to the

Deacons using testimony that was conspired and could not be opposed by this Plaintiff being excluded then from these private sessions allegedly meeting just as pastors and deacons and Corporation officers.

20. Plaintiff states that the TRUST of the Deacons of these pastors and Gary Leatherman lead to their naïve cooperation to the deceit of the Corporation members at large.
21. Plaintiff states that Ron Beck did not become Senior Pastor of the FBCCP until July 1994.
22. Plaintiff states that Plaintiff first met Ron Beck while both were students and played on the football team together at Temple Heights Christian School in the 1970's.
23. Plaintiff states that Plaintiff also met Ron Beck and worked with Ron Beck in the 1970's Gasparilla Parade.
24. Plaintiff states that at the request of several members and Deacons to the Senior Pastor Ron Beck (BECK) who then BECK nominated this Plaintiff to the General Membership and through appropriate Committee, I, Randall Townsend, was nominated and approved by membership vote to serve on the positions of Special Ad Hoc Committees as per the BY-LAWS, the MEDIATION TEAM organized to meet with and to approve with approved church general membership vote, HILLSBOROUGH COUNTY in the eminent domain taking of the front easement parcel of land of the FBCCP as necessary for the reconstruction and widening of GUNN HIGHWAY, needed for construction of SICKLES HIGH SCHOOL and I also state was approved to serve on the PHASE ONE COMMITTEE organized to meet to develop with the Long Range Planning Committee, Building and Grounds Committee, Pastors, and various other Committee heads as a joint committee to

administer the plans created heretofore from the work of the LONG RANGE PLANNING COMMITTEE.

25. Plaintiff now states through direct testimony of the Father of Ronald Beck, Jr. Beck on September 5, 1999, and at other times and from direct interviews with Herman Meister and others that Ron Beck was extremely angry with Plaintiff, due to jealousy, greed, pride and Ron Beck's "intentional plan to come to Citrus Park to build a new facility to be the biggest in Hillsborough County at what ever cost it required faster than any project of Idlewild Baptist", per Ron Beck's own words in 1999, to this Plaintiff but this Plaintiff was in his way. Plaintiff had done now over 100 building and expansion projects and as a consultant in a professional capacity realized that Beck was not competent for the unbiased planning and operation of the project for this Church and School and several times advised Beck and Meister of this negligence to the Corporation and collective general membership goals.

26. Plaintiff states that this PHASE ONE COMMITTEE was created by RON BECK, misusing his role and authority as Pastor to form this AD HOC committee of uninformed members when he realized that this CHAIRMAN of the LONG RANGE PLANNING COMMITTEE, Randall Townsend, the Plaintiff herein was preparing and presenting a variety of plans as stated to the General Congregation and approved by their vote in the meeting of March 24, 1996, by Ron Beck's own words stating "None of these decisions will be made without taking (them) to the body", to be called options A-Z or infinity, if necessary for the LONG RANGE PLANNING COMMITTEE for BUILDING AND GROWTH EXPANSION as stated would be done to the GENERAL CHURCH MEMBERSHIP per various church business

meetings and in this same meeting pastor of Administration Elbert Nasworthy stated “Yes. The Long Range Planning Committee contacted the Florida Baptist Convention and their Architectural Department and had a meeting with Russel Hughes about a month ago. Randy Townsend had a meeting with him and I was part of that meeting also. We also Contacted the Southern Baptist Convention...” and Plaintiff met with Cogan Industries and Carl Doozan and Associates and many other contractors during 1997 –1999, as employed as a professional and that Ron Beck conspired to only present Beck’s plan of selling the 7705 Gunn Highway current property and building on new property he proposed as the only option that still he demanded to be approved by Judge Barton as late as March 28, 2006, but was denied to be built by his tampering with evidence and obstruction of truth of the faults of his plans to building and planning specialists at Cogan Industries and other architect firms as Carl Doozan and others and Church Committees or by manipulation of Judges and multiple Attorneys and this Plaintiff and his Senior staff.

27. Plaintiff states that FBCCP POLICIES ARTICLE IV. FIDELITY was followed by me, Randall Townsend and that I and all other members expected all others to also completely follow and obey this ARTILE IV FIDELITY, clause as agreement to obey as a MEMBERSHIP CONTRACT DUTY required as a MEMBER OR OFFICER FIDUCIARY DUTY for all or any member per this FBCCP BY-LAWS.

28. Plaintiff states that during 1996-1999, at various times Plaintiff in his role of service to his duties as a general member and as a Position of Leader of a committee or being requested by members to address special issues would contact and meet privately with Senior Pastor Ron Beck and address and discuss issues of the frauds of not

reporting the missing money, the frauds regarding the building program and negligent acts of these pastors as stated in these Complaints.

29. Plaintiff states that during 1996-1999, at various times Plaintiff in his role of service to his duties as a general member and as a Position of Leader of a committee or being requested by members to address special issues would contact and meet privately with Pastor Of Administration William (Bill) Brown and address and discuss issues of the frauds of not reporting the missing money, the frauds regarding the building program and negligent acts of these pastors as stated in these Complaints.

30. Plaintiff states that during 1996-1998, at various times Plaintiff in his role of service to his duties as a general member and as a Position of Leader of a committee or being requested by members to address special issues would contact and meet privately with Pastor of Administration Elbert Nasworthy and address and discuss issues of the frauds of not reporting the missing money, the frauds regarding the building program and negligent acts of these pastors as stated in these Complaints.

31. Plaintiff states that from his own personal knowledge that Elbert Nasworthy was made by Ron Beck as the source of the problems at that time by the acts of the Pastors to cause the frauds of the finances and frauds of the Master Building Plan and this was the cause for Elbert Nasworthy to be forced to seek other employment and this was done by Beck to conceal his plan with Herman Meister as Herman Meister revealed to have Herman Meister as the Pastor and Principle of the School to still promote the false finance issues and false issues regarding the Master Building Plan.

32. Plaintiff states that from his own personal knowledge as no one else can state what was going through the mind of this Plaintiff that it was because of the use by Ron

Beck to use the alleged allegations of “marriage problems” Beck intentionally created and promoted and used to the extortion on the wife of this Plaintiff as the member and school teacher and use her allegations purely out of context that this Plaintiff on October 11, 1999, had to give the letter to the wife to leave the home as this Plaintiff nor his Children did not have any safe harbor of a home as this wife was telling Ron Beck frauds and Ron Beck through the use of the corrupt means and methods of Joe Howlett as a Hillsborough County Sheriff Deputy and as his role to cover up his helping Ron Beck with the misrepresentations of the finances as a Trustee and Howletts blind eye to help Beck at all costs stay with clean hands as this would reflect badly on Howlett as a Sheriff Deputy had to tell the wife to leave the marital home.

33. Plaintiff states that out of fear of being arrested on these False Charges by the conspiracy of Howlett and Beck and Meister and Leatherman and the omissions of truthful disclosure of the wife that this Plaintiff feared being put in jail and from jail this Plaintiff could not get the truth of the frauds being done to the wife, to the church by the still missing money and misappropriations of funds and by the attempt to expose the frauds being told against the Master Building Plan.

34. Plaintiff states that when requiring this wife to even leave the marital home and still believing that Gary Leatherman was still in favor of helping Plaintiff expose the frauds being done by the pastors to hiding in secret accounts money by the pastors and not reporting this money to the Finance Committee under the supervision and care of Gary Leatherman as the Chairman that this Plaintiff saw the separation from his wife and children as only temporary but necessary in order to still fight against the

evil acts of Beck, Brown, Meister, Leatherman and Howlett and the acts of omissions of truthful disclosure of the wife.

35. Plaintiff states from his own personal knowledge that Gary Leatherman in October 1999, admitted that he was aware of Secret funds in Secret accounts being hid by these Pastors in violation of the BY-LAWS after they had been repeatedly warned.
36. Plaintiff states that from his own personal knowledge that Gary Leatherman admitted the acts of Joe Howlett chasing this Plaintiff down public streets was damaging the image and reputation of this Plaintiff to the general public church members and agreed to ask Joe Howlett to stop this abuse and harassment but Joe Howlett did not stop and the chasing and abuse got worse and Plaintiff believes now that Gary Leatherman said this false promise to get Joe Howlett to stop but instead need this as extortion on Plaintiff to keep the other corporation frauds in progress.
37. Plaintiff states that in order to protect his only source of income being a State Of Florida Security Guard with a State of Florida Class D license and working at the Citrus Park Town Center Mall as a 3<sup>rd</sup> Shift Security Supervisor that the threats by Joe Howlett as a Sheriff Deputy for Hillsborough County did threaten this Plaintiff that the threats of Joe Howlett could cost Plaintiff his employment.
38. Plaintiff states that at that time Plaintiff was trying to endure the possibility of litigation to have review of the Restrictive Covenant from the Plaintiffs previous employer SunBelt Equipment Sales who were exposed for double and triple billing of customers for the same project.
39. Plaintiff states that this Plaintiff did not know that the acts of Gary Leatherman as a Finance Committee Chairman and as Trustee and as Personnel Committee Member

were being done to fraud this Plaintiff and by time to now allow this Plaintiff to fully expose the evil acts of frauds by Gary Leatherman to keep this Plaintiff stupid to Gary Leathermans role in the conspiracy to fraud the membership and to try to return these missing funds back quietly into the BUSINESS MEETING REPORTS over a 2-3 reporting period until April 2000, when the REPORT OF THE PERSONELL COMMITTEE was released and that the fact Gary Leatherman had been the author and investigator of the "FINDINGS" alleging blame against this Plaintiff as this Plaintiff was told this by JIM LEAHY as the Chairman of the Personnel Committee.

40. Plaintiff states that the FBCCP BY-LAWS, strictly prohibit these Pastors, Trustees, Committees from in harassment and abuse and conspiracy in violation of the duties per the contract known as the FBCCP BY-LAWS to use the threats and harassment and abuse against the wife and children of this Plaintiff is a strict violation of the FBCCP BY-LAWS and these acts are violations of the duties as any citizen of common law of the state of Florida and a violation of Joe Howlett as a Sheriff Deputy as a Sheriff Deputy to abuse and harass and use abuse of process on any normal citizen and that these Church Faction leaders did these acts in order to conspire to keep their past actions from being uncovered while they attempted their new actions of fraud to not be caught or exposed or be arrested for their criminal acts as stated herein and in these complaints and exhibits.

41. Plaintiff states that because of this **FBCCP BY-LAWS CONSTITUTION** **POLICIES** AND PROCEDURE that Plaintiff joined this CHURCH and brought his family to join also because of the protections afforded per this full CONTRACT with all members agreeing to follow as a CHURCH in civil obedience to form together per

the full Contract to then do the act of WORSHIP per the guidelines set aside as the sec. 1. CONSTITUTION ARTICLE II (Doctrinal Statement) sections calls for worship.

42. Plaintiff states that Plaintiff knowing the United States Constitution and State Of Florida Constitution stating that “No law shall impede the obligation of a contract” that this should protect this Plaintiff and Plaintiff’s family in participation of Plaintiff’s religion or choice as a Baptist Church and be protected by these Constitutions protecting this Plaintiff and others in the practice of religion using these BY-LAWS as a guide to this protection of worship and practice of religion protecting the acts and practices of organization as they practiced their Doctrines of Worship as stated in these BY-LAWS in ARTICLE II.

43. Plaintiff states per his own personal knowledge that the acts of FBCCP BY-LAWS, Article II. Sec 1.-16. Were not to be evaded by any acts of Plaintiffs or Defendants in this Lawsuit and that the additional acts of Sections 17 and above were added by Defendants after Plaintiff and his family was violated and that these Defendants did add these additional acts of Sections 17 and above as attempts to protect these Defendants from this litigation yet these same Defendants have violated these new sections 17 and above at will even using these courts to enact litigation against this Plaintiff by using their frauds and abuse of process while a Trustee and a major actor in this Conspiracy to fraud while acting as a Sheriff Deputy assaulted and chased this Plaintiff on public property and even came to the court of Judge Palomino dressed in attire as a Sheriff Deputy to intimidate, confuse, and to give false testimony to the court, to enrage the court and other FBCCP members and per the testimony of this

Plaintiff attorney, Charles Scruggs, finally revealing his actions of fraud of his client, on February 9, 2006, intimidated this attorney that this Plaintiff was allegedly a criminal trying to assault and fraud others.

44. Plaintiff alleges from his personal knowledge of the inner workings of the Church and of the Laws of this State and of the Laws of this UNITED STATES OF AMERICA that only “ARTICLE II (Doctrinal Statement) Sec. 1.-Sec. 16.” Of the CONSTITUTION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK TAMPA, FLORIDA 33625” are protected by the First Amendment and Fourteenth Amendment of the UNITED STATES OR FLORIDA CONSTITUTIONS of separation of Church and State as the section dealing with the CHURCH “DOCTRINE BELIEFS” or ECCLESIASTICAL” Beliefs or “Spiritual relation with their members” “as long as no civil rights are involved.”
45. Plaintiff states that on September 8, 1999 through current times and from events before September 8, 1999, that the acts of a “faction” within the FBCCP lead by the Senior Pastor Ron Beck, Herman Meister, Gary Leatherman, Joe Howlett, Tim Jeffers, Dr. Lon Lynn and others did conspire to overthrow the BY-LAWS POLICIES and PRACTICES and create for themselves to enrich their pockets and enrich their personal ego’s and pride did fraud, mislead, deceive and attempt to obtain control of the Corporation of the FBCCP by violation of the Laws of the BY-LAWS POLICIES of all Sections of the BY-LAWS as submitted as Exhibit to these COMPLAINTS.
46. Plaintiff states that select Defendants and Defendant Corporation via the letters and faxes as affirmed were received by congregation members in the testimony of Beck to

Judge Palomino on November 15, 2001, did become aware of the true allegations to put the Corporation members on notice of fraud allegations by Beck, Meister, Leatherman and Karen Harrod Townsend and other members like actions of Dr. Lon Lynn, however when Plaintiff was not allowed to attend the Church Business meetings being invited by these same members and these members not knowing the acts of Joe Howlett as a Sheriff Deputy on public property not allowing this Plaintiff to enter the meetings to review the violations of the BY-LAWS and civil rights of this Plaintiff and Plaintiffs children.

47. Plaintiff states that the FBCCP BY-LAWS of “Revised Policies Approved by Church Vote April 4, 1993” Section of “Doctrinal Statement Sec. 1. Through Sec. 16.”

Known as the ECCLESIASTICAL or DOCTRINE sections remained untouched as this “Faction” attempted to rework and change the operations, practices and daily accountability issues of the CORPORATION doing daily business under the rules of the State Of Florida as per these BY-LAWS were altered as per EXHIBIT

\_\_\_\_\_, herein of the “**DRAFT JUNE 25, 2000 UPDATED FIRST BAPTIST CHURCH OF CITRUS PARK BYLAWS COMMITTEE WORKSHOP**

**MINUTES JUNE 20, 2000** show as being changed herein not changing sections 1-16 of the DOCTRINE STATEMENT but only adding additional DOCTRINE STATEMENTS and other operations of business sections.

48. Plaintiff states that this EXHIBIT \_\_\_\_\_, hereinafter called “DRAFT JUNE 25, 2000”, shows proof for this Court to see the issues of “PROBABLE CAUSE” and issues of “MALICE” and issues of “TORT” and issues of “FRAUD” and issues of “BREACH OF FIDUCIARY DUTY” and issues of “ABUSE OF PROCESS” and

issues of “INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS” and issues of “INTENTIONAL MISUSE OF THE COURTS” actions done by this “FACTION” in a specific premeditated attempt to extort, fraud, deceive and violate the civil rights of this Plaintiff, the courts, his family, his children and other innocent Church members and is proof for any court or jury to understand the issues of this Complaint and view these tort actions as violations of civil rights and civil common laws and not interfere in the DOCTRINE STATEMENT or ECCLESIASTICAL statement as these faction members themselves Ron Beck, Gary Leatherman, Geoff Smith, Mike Shumate and others as shown as MEMBERS OF THE COMMITTEE to change these rules and show by the UNDERLINED sections what are their intents to change or add to supplement the existing BY-LAWS in affect at the time of September 8, 1999, when Ron Beck violated the existing BY-LAWS and began the attempt to alter the new BY-LAWS by this DRAFT JUNE 25, 2000.

49. Plaintiff further states that this “DRAFT JUNE 25, 2000” shows the intent of these “Faction” members to protect their actions during their fraud of this Plaintiff as a member and others as members to protect then these alleged honorable men with these changes to the DRAFT that were not protections in the BY-LAWS at the time these actions of frauds were started as alleged by this PLAINTIFF acting to protect the original BY-LAWS and actions within full compliance to the BY-LAWS in affect at that time.

50. Plaintiff states that even this DRAFT JUNE 25, 2000, maintains this Corporation as a Congregation form of or as a Church and that in order to allow this “FACTION” the opportunity to change this new DRAFT JUNE 25, 2000, to protect these abuses of the

Original BY-LAWS that this “FACTION” used the abuse of process and frauds and deceptions of the conspiracy by Ron Beck and Joe Howlett using his role as a Hillsborough County Sheriff Deputy to make up frauds and lies with the cooperation of Gary Leatherman to do frauds and lies to extort naïve Church members and Plaintiff’s family while this DRAFT JUNE 25, 2000, was formed to allow the faction to overtake the operation of the Church and conceal their past frauds and deceptions alleged by this Plaintiff about the missing and misappropriation of finances and intentional deceptions about the BUILDING MASTER PLAN.

51. Plaintiff states that on September 8, 1999, Plaintiff’s removal from Plaintiff’s positions as stated above herein and per the COMPLAINT, FIRST AMENDED COMPLAINT AND SECOND AMENDED COMPLAINT were not done per the FBCCP BY-LAWS CONSTITUTION AND POLICIES as violations of the BY-LAWS and violations of the FIDUCIARY DUTY of these in leadership and as members and in violation to the laws of the State of Florida as stated per the cases stated here as:

- A. **EPPERSON v. MYERS** 58 So2d 150, 1952 Fla. SCt 512 (Fla. 1952) stating  
“The Baptist Church is congregational in government and conducts its proceedings by well-established rules of church order...[The affairs of the Baptist Church] must be accomplished by the [c]hurch organization under recognized rules of church order. When a ‘faction’ of the church arrogates authority to itself, disrupts the organization and sets at naught well-defined

rules of church order, there is no course left for those who desire their rights settled through orderly processes but resort to the courts.”

B. **UMBERGER v. JOHNS** 363 So2d 63, 1978, quoting **EPPERSON**.

52. Plaintiff states that the conduct of a “faction” in and of the officers of the Church violated the FBCCP BY-LAWS, and “arrogated authority to itself” as reported in Exhibits presented to this court and ignored the “well-defined rules of church order” and refused to report, account for and use properly all church and school monies in the treasuries as was required per the BY-LAWS and did “disrupt the organization” by refusing to properly report the treasuries and refused to properly report to the general congregation that monies were being hid, mishandled, used for unauthorized purposes, misappropriated for personal use, used to pay illegal charges to credit cards and was being collected under false pretenses of being used to promote a fraudulent building and growth expansion project that this “faction” knew with proofs from this Chairman of the Long Range Planning Committee and from the positions of authority as stated above and herein that this expansion growth plan was a fraud to cover allegations of embezzlement.

53. Plaintiff states that by the act of Ron Beck on September 8, 1999, taking the keys from this Plaintiff and terminating this Plaintiff from all of his official duties as per the BY-LAWS nominated to these positions per the review and recommendation of the NOMINATING COMMITTEE and approved by the DEACONS and voted to these positions by the unanimous vote of CONGREGATION for over 5 years in a row was a violation of his alleged faction authority as the Pastor acting without the

ARTICLE III Sec 7., co approval of the DEACONS after a meeting by the DISCIPLINE OF A MEMBER PROCESS BY THE BOARD OF DEACONS MEETING WITH THE PASTORS AS THE DISCIPLINE COMMITTEE and was outside any authority vested to or of him per the BY-LAWS per the rules of the BY-LAWS as stated and also never gave this MEMBER the opportunity to address this DISCIPLINE COMMITTEE with the facts to protect the rights of this member and protect the rights in the best interest of the CORPORATION as these same DEACONS had requested this OFFICER/MEMBER to do and report to them Plaintiff's finding to keep them "as pure as the driven snow" or to the Congregation that requested the same service of this Plaintiff as Member and Leader to give them advice "as pure as the driven snow" and unbiased based facts on the growth and expansion projects.

54. Plaintiff further states that the acts of Ron Beck to the court of Judge Palomino on November 15, 2001, were his intentional waiving and intentional act to violate the BY-LAWS in affect at the time of publicly violating the Rights of this Plaintiff per the BY-LAWS on September 8, 1999, and then to act to the court of Judge Palomino in violation of this DRAFT JUNE 25, 2000, per "sec. 20. LAWSUITS BETWEEN BELIEVERS:" as an intentional act to show this court that the BY-LAWS were waived and that this member, BECK and the CORPORATION and "faction" members joined with him jointly with all the members voting to approve the actions before Judge Palomino were waiving their alleged DOCTRINE RIGHT to not use these courts but instead they voluntarily came to the court to promote a position this Plaintiff alleges that his malicious prosecution and this Plaintiff has a right to prove a

defense to the court of all allegations made by Beck and others of the “faction” that shows the frauds to the court that show how they allege this Plaintiff was doing frauds to members and alleging frauds to the court. Therefore this Plaintiff alleged that only by the first hand review of all financial records of the Corporation and the review of all Church Business Meeting Minutes as has been requested since 1997 and through these courts since this first Complaint was filed in April 2002, can this Plaintiff prove either that Beck or Plaintiff is the fraud to the membership and by Beck’s actions and statements to Judge Palomino per the transcripts of November 15, 2001, who made false statements to the court of Judge Palomino, Beck or Plaintiff as Beck stated the written letters and faxes from this Plaintiff were fraud and lies.

55. Plaintiff states that for Ron Beck (Beck) as the leader of the “faction” acting outside the four corners of the BY-LAWS Rights and responsibilities using his alleged status as Pastor conspiring with only select other “faction” officers as Herman Meister, School Pastor and Gary Leatherman as Trustee and Finance Committee Chairman and then Fraud to obtain the actions of Joe Howlett as a Trustee and as using his role as a Hillsborough County Sheriff Deputy to act as “ROBO COP” to block Plaintiff from exposing the misrepresentations of BECK and LEATHERMAN and MEISTER and HOWLETT from exposure for acts of violations of his TRUSTEE duties is CORPORATION fraud and THEFT against the Corporation and Congregation members by a “faction” and the Corporation is protected and could obtain Judicial intervention as stated in **THE WORD OF LIFE, INC v. MILLER** 778 So2d 360 (Fla. App. 1 Dist. 2001) stating, “1. Religious Societies 14 Action brought by corporate church and members of congregation to protect corporation’s assets and to

contest dissolution of corporation implicated only neutral legal principles and, thus, could be judicially resolved, despite corporation's religious purpose." Further, stating, "3. Corporations 57, Corporations must act in accordance with its articles on incorporation and duly adopted by-laws." Further, "Limitation of Actions 58(4), Corporate church's cause of action against minister to protect corporation's assets and prevent dissolution of corporation accrued on date when ministers attempted to dissolve corporation and to distribute corporate assets without approval of corporation's members. West's F.S.A. s.95.031." Further, "Limitation of Actions 43, a statute of limitations runs from the time the cause of action accrues which, in turn, is generally determined by the date when the last element constituting the cause of action occurs. West's F.S.A. s. 95.031" Plaintiff alleges that the "factions" violations of the contract and the continued conspiracy to fraud and conceal the original acts of violations of the BY-LAWS and not reporting all the money and the not reporting of missing money and the attempted payoff of Gary Leatherman as the FINANCE COMMITTEE CHAIRMAN for services allegedly to be performed as a volunteer but was attempted to be by the recommendation and act of the co-conspirator Ron Beck attempted to pay Gary Leatherman for helping Beck and Howlett conceal with Meister their corporation violations and hostile acts against this Plaintiff and this continues then to use and fraud the services of attorneys to use trickery and fraud to the courts to still conceal the corporation records that would reveal the truth of the original corporation BY-LAWS violations. Further, "9. Corporations 312(7) Like any owner, a corporation is entitled to recover property that others, including its officers or employees, have wrongfully converted." Plaintiff

states that since the Corporation books remain hid and protected by the ROBO COP actions of TRUSTEE JOE HOWLETT and the trickery of Attorneys(Scruggs, Denny, Turmel, Gray, Solomon, Gardner, Gibbs III) that these acts against this Plaintiff serving to the duties as per the directive of his BY-LAWS duties being voted out by FRAUD from these same “faction” conspirators shows criminal activity of the “faction” and served as a warning of extortion and threats to any and all others that ROBO COP Howlett would act against them as done against this Plaintiff to ruin him and his family if any person did not allow BECK and HOWLETT and MEISTER and LEATHERMAN and JEFFERS and DR. LON LYNN to continue their violations of LAW and the BY-LAWS going all the way to do FRAUD to the COURTS OF JUDGE PALOMINO, ARNOLD, TIMMERMAN, CRENSHAW, GOMEZ, SIERRA and to the Second District Court of Appeals and other government agencies such as Sheriff Department Internal Affairs and Doctors actions to abuse and conspire to do harm to patients, as the estranged wife and children of the plaintiffs marriage as the attorney retained by Plaintiff in 2000, to “restore the reputation” of this Plaintiff did fraud this Plaintiff from 2000 through September 30, 2003, until confronted by the Ruling of this Court of September 2003, allowing this Plaintiff to have a cause of action for Malicious Prosecution and upon confrontation with Attorney Charles Scruggs his admission to his fraud that “his personal convictions did not allow him to make a church look bad” and this fraud did allow additional criminal acts to toll the frauds done by Beck, and his co conspirators helped by Attorney Scruggs fraud and omissions of truthful disclosures to Judge Palomino, Judge Timmerman, Judge Gomez and to this client now Plaintiff herein being deceived trying to represent

himself as PRO SE and thus was tainted in presentation of facts and cases laws as the continued advice of Attorney Scruggs did not reveal proper legal counsel and advice of all true matters of law from the honest and true prospective of an attorney and former Circuit Court Judge in this County.

56. Plaintiff further states the abuse on the Plaintiff and infliction of emotional duress on Plaintiff and his children still exist due to the frauds started by Ron Beck, Herman Meister, Gary Leatherman, Joe Howlett, Tim Jeffers, Dr. Lon Lynn and others that include acts to fraud the court of Judge Palomino, then take the words of Judge Palomino to do fraud to others as per the words stated in this Court by Attorney Denny and the First Affirmative Defenses used by Attorney Denny confirm frauds stated by Beck and others and were words used of alleged allegations raised or orders given by Judge Palomino to Judge Timmerman by Attorney Stacey Turmel and by the estranged now former wife Karen Harrod Townsend and who by his intentional corruption and fraud and omissions of truthful disclosure attorney Charles Scruggs, who was present in the chambers of November 15, 2001, and in chambers of Judge Timmerman on January 30, 2003, did intentional fraud on the court of Judge Timmerman to “not make a church look bad” so therefore the allegations of bad conduct and fraud to the court of Judge Palomino that only the production of the Corporation Financial Books and all Corporation Business Records reviewed will show who did these frauds on Judge Palomino and Judge Timmerman and this Court and other Courts and who did fraud to the FBCCP Corporation and BY-LAWS and these frauds and infliction’s of emotional distress and prosecution of these issues remains an issue for these courts due to the injunction that is still harming this

Plaintiff's relationship with his children as Judge Timmerman injunction is still being used by these Church members to hide this PRO SE PLAINTIFF even from discovery of violations of his own children now adults but who in June 2002, were even forced to leave the CPCS School, before graduation of the Plaintiff's Daughter Minor J.G.T against her will to move out of town to flee the abuse and infliction of emotional duress and fraud being still done by Ron Beck, Herman Meister, Dr. Lon Lynn, Joe Howlett and Tim Jeffers and many others as members at FBCCP and CPCS who intentionally set BECK and others into motion to go to the Court of Judge Palomino and start his intentional frauds to these courts as Beck believes his alleged rights as a Pastor put him above the law.

57. Plaintiff states that the actions of Ron Beck bringing to Court to also testify as witnesses, Karen Harrod Townsend, Joe Howlett, Herman Meister to allegedly validate the fraudulent testimony by Ron Beck was a scheme of fraud to Judge Palomino and per the testimony of attorney for this Plaintiff Randall Townsend the respondent in the cases before Judge Palomino, Attorney Scruggs admitted this action of Joe Howlett did intimidate and suppress the actions of Attorney Scruggs to present a case as hired by this Plaintiff to do to clear his slandered and now permanently damaged reputation but Attorney Scruggs who has never done any discovery or use of the courts to gain any production of Church Documents as hired by Plaintiff to do should be proof that no true evidence to counter the allegations by Beck that the positions of Plaintiff in letters and verbal accusations were true or untrue but Attorney Scruggs instead did fraud on the court and omitted truthful disclosure of evidence to

prove that Plaintiff was honorable and not practicing fraud on this Plaintiff's family, the church, the school or any court or any other person.

58. PLAINTIFF STATES THAT THE EXTORTION BY BECK, LEATHERMAN, MEISTER AND HOWLETT AND JEFFERS LED DIRECTLY TO THE FRAUDULENT ALLEGATIONS BY KAREN HARROD TOWNSEND DERIVED FROM INTENTIONALLY CREATED "SCHISM" ISSUES BY BECK TRYING TO INSTIGATE MARRIAGE ISSUES AS A FALSE FRONT TO THE INVESTIGATION BY THIS PLAINTIFF INTO THE MISSING MONEY AND BUILDING PLAN FRAUDS AND BECK DID MAKE FALSE PROMISES TO THE PARENTS OF THIS PLAINTIFF THAT HIS PURPOSES OF MARRIAGE COUNSELING WAS TO HELP THE FAMILY BUT HIS ACTIONS SHOW FRAUD TO THIS PROMISE AND A PROVABLE INTENT TO USE THE CREATED MARRIAGE ISSUES TO DESTROY THE INTEGRITY OF THIS PLAINTIFF SO BECK COULD CONTINUE HIS "SCHEME" WITH MEISTER AND LEATHERMAN AND HOWLETT TO INCLUDE EXTORTION AND ABUSE ON THE MARITAL CHILDREN IN THE PRIVATE SCHOOL AS NECESSARY AND HIDING THIS ABUSE UNDER THE SUPERVISION AND INTERFERENCE OF DR. LON LYNN TO THREATEN THIS PLAINTIFF TO NOT EXPOSE THE CRIMINAL ACTIVITY OF THE "SCHISM" UNTIL THIS PLAINTIFF REQUIRED THE INTERVENTION OF DR. SANTIAGO HOYOS WHEN LEARNING OF DAUGHTER J.G.T MISSING SO MUCH SCHOOL SHE MAY NOT GRADUATE AND THIS PLAINTIFF BEING VERBALLY ASSAULTED ONE JANUARY NIGHT IN 2002, WHEN MEISTER YELLED,

“WE MADE A PACK TO DENY AND DESTROY ANYTHING YOU SAID”  
THUS AGAIN THIS PLAINTIFF SOUGHT THE LEGAL HELP OF SCRUGGS  
AND THE SHERIFF DEPARTMENT TO STOP THIS ABUSE AND OBTAINED  
THE HELP OF DR. SANTIAGO HOYOS AND THUS PLAINTIFF FILED SUIT  
IN APRIL 2002, TO STOP THE VIOLATIONS OF HIS CHILDREN EVEN BY  
THE NOW FORMER WIFE..

59. Plaintiff states that the **KOND v. MUDRYK** 769 So2d 1073 case based mostly on **DOE V. EVANS** 718 So2d 286 (Fla. 4<sup>th</sup> DCA 1998) quoting other District Court Opinions which was overturned by the FLORIDA SUPREME COURT in **DOE v. EVANS** 814 So2d 370 (Fla. 2002) Florida Supreme Court SC94450, March 14, 2002. And Plaintiff states that the Pastors and the Corporation members and officers held themselves out as marriage and family counselors based on the contract provisions in the BY-LAWS and in the CITRUS PARK CHRISTIAN SCHOOL HANDBOOK and other contracts of student enrollments and other public statements and that these persons know that violations to disrupt a father from being a parent or seeing his children greatly damage the mental, emotional and physical person of the child and the father and the family and even in these publications these Corporation members allege they only try to administer harmony in the family yet the actions of case show that part of their intent by these Defendants was even to fraud the courts by giving intentional false testimony that Plaintiff was stalking or was giving written letters and faxes of false information and frauds and these Defendants waived any and all alleged interference with the courts implying standards to their alleged religious actions that purely show are in violation to their stated religious beliefs and practices and these

Defendants attempted to fraud and deceive Judges, Palomino, Timmerman, Arnold, Crenshaw, Gomez and Sierra and the Second District Court of Appeals as these Defendants took actions out of their conspiracy and then now came to these same courts and claim protections or invasion into their religion when one tries to expose how their original actions were frauds of criminal torts and theft and fraud and child abuse and intentional infliction of emotional duress and using a Hillsborough County Sheriff Deputy, Pasco County Sheriff Deputy and a Pinellas County Sheriff Deputy and a Tampa Police Officers in the process of never letting this Plaintiff use the courts rights to expose the true facts but was barred from testifying by his own Attorney Scruggs using extrinsic fraud to protect his own personal convictions of not making a church look bad thus intending to fraud the courts in order to cover up criminal activity allegedly as false religious activities using extortion and damage of physical, mental and emotional abuse and infliction of emotional duress by using abuse of process and stalking by a Deputy Sheriff trying to use his uniform to cover up his criminal acts of frauds to a Corporation of Church members by using his uniform and Sheriff automobile to stalk and chase and harass and even do false traffic stops with no probable cause just to keep this father from attending the open congregation meeting and exposing to these innocent congregation members the frauds being done by the wife, the deputies, the pastors and other officers for the FBCCP Corporation.

60. DOE V. DORSEY 683 So2d 614, 617 (Fla. 5<sup>th</sup> DCA 1996) TORT Guardian law interfering with parents rights to cover up criminal torts of intentional “assault and

battery” and criminal theft and criminal fraud and misrepresentations of facts to give false information to law enforcement and to the courts.

61. Plaintiff states that despite repeated visits to the Internal Affairs offices of the Hillsborough County Sheriff and the Pinellas County Sheriff and these internal affairs officers advising that the conduct of their officers was to be reviewed as not within officer policy that the Deputies Howlett, Jeffers and Corbin and Kieras who would react to a new false allegation and fear tactic of Beck and Meister and Leatherman who acted as if they are above the law and all right to slander this Plaintiff with no recourse to use the court to clear a slandered reputation and correct the damaged public view of this Plaintiff by the false allegations of an alleged religious pastor doing fraud at will to violate this father and the marital children as Church members and students in the school to do acts in clear violations of Florida Statues 827, Abuse of Children and then to cover up this Abuse willfully does violate Florida Statue 837, Perjury to the courts and then claim his statements are religious so that even fraud to the court is ignored by judges but the damages are done to the general public not understanding how any court could excuse pure fraud under oath being allowed under any circumstances in a court of law or from a pulpit. It is then possible to argue that a criminal could rob a bank as a defense claim that a church pastor or even the pastor himself do the robbery of the bank and claim he can never be prosecuted because he did the robbery act as a religious act to just put money in the offering plate when then this money he takes from the offering plate and using it to pay for his salary and a bonus and a vacation at the expense of the church and the stolen bank funds and this a jury would explain as odious and outrageous.

62. Plaintiff states that for Beck and the Corporation and officers of the corporation to threaten the estranged wife and now former wife with the threat of “if you do not reconcile with your husband (this Plaintiff) you cannot work here” is a violation of F.S. 760.10 and UNLAWFUL for Beck to threaten to fire the wife due to her marital status changing due to the separation from her husband due to the frauds during marriage counseling caused by Beck and Leatherman and Meister and Brown by bias and fraud and the act of voyeurism by Browns as per the finding in and via threatening to help her do criminal acts to help his extortion and theft which violated her religious beliefs as non ecclesiastical normal acts of civil conduct with normal respect and honor of any normal citizen as stated to follow in the BY-LAWS. This also violated the children because of the fact of the employment of the mother their tuition was free as a condition of the employment of the mother and would be lost if she was fired and this was an act of threat and extortion on this Plaintiff already on a limited income and also trying to support expenses for the family and not be faced with added pressure of school tuition at a time of personally trying to finance litigation to protect the rights of this Plaintiff, his family and the Church Corporation. These facts are for the finding of a jury and raise to the point of “odious and outrageous” elements for the finding by a jury.

63. Plaintiff states that on Friday, March 31, 2006, Plaintiff received information for the first time this knowledge that Sheriff Deputy Joe Howlett in 2001, had informed Curtis Baughman, of Victims Assistance to become involved based on his allegations to this agency by Sheriff Deputy Joe Howlett and Sheriff Deputy Joe Howlett advised this agency to intervene in the allegations alleged by Sheriff Deputy Joe Howlett against Plaintiff Randall Townsend.
64. Plaintiff states this attempt to require Victims Assistance to investigate Randall Townsend by Deputy Joe Howlett as an officer per Florida Statutes 943, was a fraud and an attempt at fraud and an omissions of truthful disclosure and violation of Deputy Howlett's duties as a F.S. 943 officer to violate the rights of Randall Townsend as a private citizen and an officer under Florida Statutes 493, that Deputy Joe Howlett fully knew was intending to bring these false charges and allegations in order to hide the ongoing criminal actions of himself and others in leadership and employee at the FBCCP.
65. Plaintiff states that proof of the frauds as being advised to Victim's Assistance and others and as stated to this Court per the verbal statements made by Attorney Denny in verbal arguments to this Court and per the First Affirmative Defenses allege that Judge Palomino promoted that Criminal Charges should be alleged against Plaintiff, however these transcripts supplied to this court show no threats or actions were advised by Judge Palomino per the words of Attorney Denny as he reported from the statements of his clients these defendants and the truth of this matter must be propounded to a jury for proper consideration of their findings.

66. Plaintiff states that additional proof of the frauds as being advised to Victim's Assistance and others as stated to this Court were the statements made by the estranged wife to Curtis Baughman on Victim's Assistance and in full comparison to the words under oath offered to Judge Timmerman as stated in the exhibit presented to this court from the Hearing before Judge Timmerman in case TOWNSEND v. TOWNSEND 02-4974, done on January 30, 2003, under interrogation or cross examination by Attorney Charles Scruggs, allegedly acting for the full protection of all rights for his Clients this Plaintiff and his minor children however Attorney Scruggs had not revealed at that time that his positions were compromised and prejudiced due to his later confession that "his personal convictions do not allow me to make a church look bad".
67. Further, I, Randall Townsend state that on February 9, 2006, Plaintiff discovered by the testimony of Charles Scruggs to Judge Stoddard, that the presence of Deputy Joe Howlett at the court of Judge Palomino on November 15, 2001, and the fact that he had not done discovery of the Church Business Records as directed by this client now this Plaintiff did intimidate Charles Scruggs and this Plaintiff states did allow defendant Beck and Defendant Corporation and all others to receive a benefit from the intimidation by Joe Howlett as a Sheriff Deputy and that this issue presents issues for determination and consideration of intent and motive and fraud that should be presented for the finding from a JURY.
68. Plaintiff states that Karen Harrod Townsend after being sued now in case **TOWNSEND v. TOWNSEND** case 05-09605, being heard by Judge Holder, being sued for multiple counts and including for her Malicious Prosecution filed case of 01-

15814, to Judge Palomino, filed with actions set in motion by the demands of Beck and Howlett and Meister and other Church Members using their case of 01-15813, being litigated and attempted to be heard at the same time but attorney Scruggs asked for separate hearings and having presented testimony illegally coached and extorted by Beck and Howlett and Meister and of her own intentions tried to fraud Judge Palomino that Plaintiff was “dangerous” and “potentially violent” and **Karen Harrod Townsend omitted truthful disclosure of required testimony and assisted by the fraud of Attorney Charles Scruggs did recant her false positions and omissions of truthful disclosure and on December 12, 2005, signed an affidavit in Karen Harrod Townsend’s own hand and written EMERGENCY MOTION TO DELAY DEPOSITIONS** submitted to the court of Judge Palomino when taken in consideration of the transcripts of testimony and rulings to Judge Palomino’s court in case 01-15813 and 01-15814, and the verbal testimony of Attorney Denny in the Court of Judge Crenshaw per the transcripts submitted as evidence to this court and the First Affirmative Defenses presented by Defendants to this Court clearly shows that the frauds presented by all Defendants was a joint conspiracy with total disregard for the rights of this Plaintiff and of the courts to do frauds and lies and omissions of truthful disclosure against this Plaintiff and the courts and shows these Defendants to have conspired to use fraud to court officials in order to promote their conspiracy to fraud about the facts of truth alleged by this Plaintiff now for about ten(10) years and would have been revealed to these courts in 2000, had it not been for the fraud done by Attorney Scruggs to Plaintiff giving false legal advice and

counsel in order to keep secret his “personal convictions of not making a church look bad”.

69. Plaintiff states that the filing of cases 01-15813 by Beck in and for the Corporation and the church members and 01-15814, by Karen Harrod Townsend for her and her maternal parents and brother were meant to in conspiracy unite one message to Judge Palomino to promote the frauds that Plaintiff was “dangerous” and “potentially violent” and “a stalker” by the message of Karen Harrod Townsend and “a liar” and “a stalker” and “abusive” and a “fraud” and that this joint message attempted to get the Stalking Restraining order by fraud.

70. Plaintiff states that when the Honorable Judge Palomino ruled in favor of this Plaintiff that this was then ignored by Beck and Meister and Howlett and Karen Harrod Townsend and to not expose their fraud and lies and omissions of truthful disclosure and appear to have been defeated by losing their claims to Judge Palomino that these persons named herein and in these lawsuits did conspire and advise others without truthful disclosure of the actual words of Judge Palomino as stated in the transcripts provided for the court records that these conspirators conspired and told others that “they did not want to pursue criminal charges” as Judge Palomino had directed them to do against this now Plaintiff, and they were too allegedly “Christian” to do the filing of Criminal charges and they did not need to file the criminal charges as long as they had “robo cop” Howlett and Jeffers and other members of law enforcement willing to be deceived and of their own motives using their positions of law enforcement out of the double standard of membership being frauded by Beck and Meister and Leatherman and others.

71. Plaintiff states that the use of this conspired plan to misrepresent the ruling of Judge Palomino to cover up the frauds already attempted about the true integrity and character and facts of the actions of Plaintiff was then directed by these co conspirators to Church members, family members, school parents, attorneys and other judges in a unified attempt to add frauds to compile additional frauds to cover for their original acts of fraud and violations of Civil and Criminal State and Federal Law and violations of the rules of the BY-LAWS of FBCCP.

72. Plaintiff states that as an act of extortion in order to get this Plaintiff to stop his words that the now Former Wife Karen Harrod Townsend had done tax fraud, fraud about the ski trip, fraud about the alleged abuse in the home actually being done by the wife/mother on these children and this Plaintiff father that the wife intentionally created her conspiring actions with Beck and Meister and Howlett and Dr. Lon Lynn and others in order to conspire and keep these additional acts of frauds to the Church members, family and school parents being uncovered and the actions of Beck and the now former wife and Meister and Howlett and Dr. Lon Lynn and others used as a tool of their fraud the actions of these persons to keep this father from having contact with his children and thus by this extortion was able to abuse and harass and mentally confuse these children and others and that this has permanently damaged the relationship this father has had with his children now since September 8, 1999, when Beck advised Howlett and other Church and School members that Plaintiff was “violent”, “dangerous”, “abusive” “potentially violent”, “a fraud” “ a liar” and was creating misrepresentations about the wife and the pastors but these false allegations now after all this time has been proved to have been the conspired frauds by Beck and

Karen Harrod Townsend and Meister and Howlett and Leatherman and others just to extort and damage and shame the reputation of this Plaintiff in a bad view in the public eye.

73. Plaintiff states that time now has been lost as a father/parent of his two children by the conspired fraud by Beck and Karen Harrod Townsend and others and that Doctor reports confirm that these children have been permanently damaged as Plaintiff warned and sought help to avoid these damages being done to his children and this Plaintiff.

WHEREFORE PLAINTIFF STATES THAT THESE FACTS VINDICATE ALL THE ACTIONS OF THIS PLAINTIFF TO DATE AND NOW THIS MATTER AFTER A BRIEF DISCOVERY PROCESS WILL BE READY FOR TRIAL ON ALL ISSUES:

74. Plaintiff states that the February 9, 2006, admissions by Attorney Charles Scruggs to the court of Judge Stoddard prove Scruggs is defenseless to the charge that he violated his duty to this Plaintiff and the Plaintiffs children J.D.T and J.G.T and to the honorable FBCCP members and family who believe in what this Plaintiff seeks to do.

75. Plaintiff states that the recanted verified affidavits of the now former wife in December 2005, vindicate all charges ever brought by her and Beck and Meister and Howlett and Leatherman and her maternal family and each defendant as listed in the April 2004 Complaint.

76. Plaintiff states that it is within his personal knowledge that now based on the March 28, 2006, ORDER by Judge Barton to deny the SPECIAL USE PERMIT for the FBCCP and CPCS completely confirms the truths this Plaintiff told the pastors and trustees in 1997, before the 18005 North Gunn Highway property was bought were

the true reasons Judge Barton and Zoning Member Margaret Tussing and the Keystone Park Civic Association refuse to allow the FBCCP and CPCS to fully use the property and Beck and Meister have done fraud to the courts by their position that they were not fully warned of these issues before the property was bought and this was a major factor why these pastors had to violate and abuse this Plaintiff to keep him as close to death to kill the reputation and integrity of this Plaintiff as much as possible so their crimes and conspiracy could continue.

77. Plaintiff does not know one accusation made by Beck and Meister and Leatherman and Howlett against this Plaintiff that was made by these men or the now former wife to dishonor this Plaintiff that has now not been proved untrue.

WHEREFORE, PLAINTIFF AFFIRMS All of the statements made in this affidavit are within my personal knowledge, are true and correct, and are made to request the Court

TO:

- A. DENY THE MOTION BY DEFENDANTS FOR SUMMARY JUDGEMENT
- B. GRANT AN ORDER FOR CONTINUANCE UNTIL PROPER DISCOVERY BE MADE AVAILABLE TO THIS PLAINTIFF
- C. GRANT ALL DISCOVERY REQUESTS MADE TO THESE PASTORS SINCE 1997 AND SINCE THE START OF THIS CASE AND HEREIN AND INCORPORATED HEREIN REQUESTED OF ALL TRAIL PREPERATION MATERIALS AS SHOWN ARE NEEDED FOR TRIAL AS STATED IN PLAINTIFF VERIFIED OBJECTIONS TO DEFENDANTS MOTIONS FOR SUMMARY JUDGEMENT AND ALL OTHER PLEADINGS AND MOTIONS BY THIS PLAINTIFF FOR DISCOVERY OF CHURCH CORPORATION AND BUSINESS MEETING RECORDS AND OTHER MATERIALS REQUESTED SINCE 1997, AND ALLOW PLAINTIFF TO FILE LITIGATION AGAINST ALL DEFENDANTS WHO HAVE PRESENTED FRAUDS TO THIS COURT CONSPIRING TO HARM THE RIGHTS OF THIS PLAINTIFF
- D. ALLOW AMENDED AND SUPPLEMENTED PLEADINGS TO BE FILED PER ALL MATTERS OF LAW AS SHOWN HEREIN THIS FULL CASE

AS MAY BE AVAILABLE TO THIS PLAINTIFF AGAINST ALL PERSONS NAMED IN THESE COMPLAINTS AND OTHER PERSONS AS DISCOVERED AFTER PRODUCTION OF DOCUMENTS

- E. GRANT SANCTIONS AGAINST DEFENDANT AND DEFENDANTS COUNSEL AND ATTORNEYS AS SHOWN HEREIN AS THEY HAVE VIOLATED THE RULES OF CIVIL PROCEDURE AND THIS COURT AND THIS PLAINTIFF PER FLORIDA STATUES 914, 837AND OTHERS.
- F. TO REPORT ALL NECESSARY MATTERS TO THE FLORIDA BAR, THE JUDICIAL QUALIFICATIONS COMMISSION AND TO ANY AND ALL OTHER GOVERNMENT OR LAW ENFORCEMENT AGENCY AS REQUIRED BY THE RULES OF CIVIL AND JUDICIAL PROCEDURE AND FLORIDA STATUES.
- G. GRANT A SUMMARY JUDGEMENT AND AWARD OF DAMAGES IN FAVOR OF THIS PLAINTIFF IN A DAMAGES AMOUNT OF IN EXCESS OF \$2,000,000.00 OR MORE PER THE MAXIMUM OF ALL STATE LAWS OR SUBMIT THIS AMOUNT TO AWARD OF DAMAGES TO A JURY AS PLAINTIFF MAY PRESENT AT TRIAL OF ALL ISSUES.
- H. GRANT THIS PLAINTIFF THE RIGHT TO SEEK PUNITIVE DAMAGES FROM A JURY.
- I. GRANT ANY AND ALL FURTHER RELIEF AS THIS COURT DEEMS NECESSARY TO PROMOTE JUSTICE.
- J. ISSUE PROPER LEGAL ACTIONS AGAINST THESE DEFENDANTS NOW PROVED TO HAVE GREATLY VIOLATED FLORIDA STATUE 914 AND 937 AND 772 AND 775 AND ALL OTHER VIOLATIONS AS STATED HEREIN.
- K. ALLOW PLAINTIFF TO AMEND TO ADD TO INCLUDE THESE DEFENDANTS AS ATTACHED HEREIN.

Respectfully submitted,

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 \_\_\_\_\_ 200\_\_\_\_, to Ronald L. Beck and First Baptist Church Citrus Park as Corporation and as said members as Defendants at 7705 Gunn Hwy. Tampa,

Florida, 33625, via the offices of Dickinson & Gibbons, Attention Charles Denny, IV,  
P.A. P.O. Box 3979 Sarasota, Fl, 34230 as attorney for all Defendants and to this Court.

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

SUSCRIBED AND SWORN TO BEFORE ME ON \_\_\_\_\_, TO CERTIFY  
WHICH WITNESS MY HAND AND OFFICIAL SEAL.

NOTARY PUBLIC IN AND FOR \_\_\_\_\_ COUNTY, FLORIDA.