

IN THE SUPREME COURT OF THE STATE OF FLORIDA

AMICUS CURIAE BRIEF

PER RELATED

IN RE: SC09-1121 ORDER DISBARRING ATTORNEY HEATHER M. GRAY

IN RE: SC09-1910 ORDER FOR STATEWIDE GRAND JURY #19

IN RE: SC98-2111 TOWNSEND v. BRUCE CHAPIN ET AL.; P.C.A.

IN RE: SC98-1966 TOWNSEND v. DAVID H. POPPER ET AL.; P.C.A.

IN RE: SC86-0918 TOWNSEND v. LANE; P.C.A

IN RE: SC07-1181 TOWNSEND ET AL v. KAREN TOWNSEND ET AL.

**Now as R.O.C.P 1.540 Action By Proved Frauds: Extrinsic, Intrinsic and
Fraud to the Courts by all defendants inclusive of judges and attorneys.**

IN RE: 2D10-774 TOWNSEND ET AL. v. HEATHER GRAY ET AL;

IN RE: 13th Circuit 06-6005 TOWNSEND ET AL. v. HEATHER GRAY ET AL.

FLORIDA BAR COMPLAINT(s)- 05-3977; 93-31, 690 and 691 and 692;

**NOTICE TO INVOKE JURISDICTION OF
THE FLORIDA SUPREME COURT**

FOR PETITION(S);

FOR

WRIT OF HABEAS CORPUS

WRIT OF MANDAMUS

WRIT OF CORAM NOBIS

WRIT OF PROHIBITION

TO

THE FLORIDA SUPREME COURT

AND

LOWER COURTS

RANDALL C. TOWNSEND, PRO SE

PER F.S. §617.0834 of FBCCP ET AL.

P.O. BOX 21

ODESSA, Florida 33556

941 350-2677 (cell)

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Judgeoneyourself@yahoo.com

Jfirt59@hotmail.com

RANDALL TOWNSEND,)
 Individual, and as F.S.§617.0834,)
 “Representative” As on behalf of all)
 other Corporate members “non sect”)
 as the rightful shareholders of The)
 First Baptist Church of Citrus Park)
 and Citrus Park Christian School)
 AND AS “NEXT FRIEND” AND)
 PATERNAL PARENT OF MINOR)
 SON, J.D.T.)
 AND AS “NEXT FRIEND” AND)
 PATERNAL PARENT OF MINOR)
 DAUGHTER, J.G.T)
 AND AS A DIRECT MEMBER)
 OF THE FIRST BAPTIST)
 CHURCH OF CITRUS PARK)
 CORPORATION AS (FBCCP) AND)
 AS “NEXT FRIEND” AS “DOE”))
 AS ALL MINOR CHILDREN)
 AND “OTHERS” AS “DOE” OF)
And For Plaintiff THE “NOT FOR)
PROFIT” CORPORATION)
KNOWN AS FIRST BAPTIST)
CHURCH OF CITRUS PARK,)
(FBCCP) AND)
CITRUS PARK CHRISTIAN)
SCHOOL, INC.(CPCS) and as All)
 Members of the Citizens “Classes”))
 AS “Father/Parent Class” and)
 AS “Church Class” and)
 AS “Florida Citizens Class”)
 Plaintiffs)
 v.)
HEATHER M. GRAY,)
Individually,)
HEATHER M. GRAY,)
ATTORNEY AT LAW,)
HEATHER M. GRAY,)
PROFESSIONAL)
ASSOCIATION AS A)
FLORIDA CORPORATION,)
 And Co-Defendants as)
 RONALD L. BECK, (02-03812))
 (a.k.a. Ron Beck) Individually,)
 REVEREND RONALD L. BECK,)

2DCA: CASE NO: 2D10-774
CIVIL ACTION COMPLAINT
CASE NO: CASE NO: 06-6005

JURY TRIAL DEMANDED

INJUNCTIVE RELIEF SOUGHT

CLAIM FOR CLASS ACTION

AS SENIOR PASTOR, OF)
FIRST BAPTIST CHURCH OF)
CITRUS PARK, (FBCCP),)
ET. AL. AND NOW As per all as)
DEFENDANTS Listed Below herein,

AS STATED BELOW

RANDALL TOWNSEND,
Individual,
AND AS “NEXT FRIEND” AND
PATERNAL PARENT OF
MINOR SON, J.D.T.
AND AS “NEXT FRIEND” AND
PATERNAL PARENT OF MINOR
DAUGHTER, J.G.T Et.Al.
Plaintiffs, or as Appellants
V.

L.T. CIRCUIT CASE NO: 02-03812
2DCA- CASE NO: 2D07-4861
DIVISION: K
FROM CASE NO: 01-15813 and 01-15814
OF FAMILY COURT –DOMESTIC
VIOLENCE DIVISION, &
02-4974-DIVORCE, AND
By Motions for Consolidation of below
Related cases, tried to be heard and tried
herein by jury but was unlawfully denied.

RONALD L. BECK, (a.k.a. Ron Beck) INDIVIDUALLY, REVEREND RONALD L. BECK, AS SENIOR PASTOR, OF FIRST BAPTIST CHURCH OF CITRUS PARK, (Hereinafter as FBCCP), RON BECK, AS PASTOR /MEMBER OF FBCCP AS OF CPCS SCHOOL BOARD, RON BECK, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER, AS BY-LAW’S PASTOR/MEMBER OF ALL COMMITTEES OF FBCCP AND CPCS

WILLIAM T. BROWN, (a.k.a. Bill Brown), INDIVIDUALLY, REVEREND WILLIAM T. BROWN, OF FBCCP AS PASTOR OF EDUCATION AND ADMINISTRATION;

HERMAN MEISTER, INDIVIDUALLY, REVEREND HERMAN MEISTER, AS PASTOR OF SCHOOL MINISTRIES, OF FBCCP; HERMAN MEISTER AS CPCS EMPLOYEE AND SCHOOL BOARD MEMBER, HERMAN MEISTER AS BY-LAW PASTOR/MEMBER OF ALL COMMITTEES OF FBCCP/CPCS, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,

GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE(1997-2005) DEACON AND GARY LEATHERMAN AS MEMBER OF FINANCE COMMITTEE OF FBCCP AND GARY LEATHERMAN AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,

ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; ROBERT GILES AS FBCCP DEACON, ROBERT GILES AS MEMBER OF THE CPCS SCHOOL BOARD, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,

TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER OF FBCCP TIM JEFFERS, AS FBCCP DEACON, TIM JEFFERS, AS FBCCP TRUSTEE (2005-present),

FRANK EDWARDS, INDIVIDUALLY, FRANK EDWARDS AS FBCCP FINANCE COMMITTEE MEMBER, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,

MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP;
MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMATE, AS CHAIRMAN OF DEACONS, 2000-2001, OF FBCCP;
JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE,(1995-present) OF FBCCP, JOE HOWLETT AS FINANCE COMMITTEE MEMBER 2007
GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS ALLEGED CORPORATION PRESIDENT, AND AS TRUSTEE (at all times), GEOFF SMITH AS FBCCP DEACON; GEOFF SMITH, AS CHAIRMAN OF PHASE I COMMITTEE;
DR. LON LYNN, INDIVIDUALLY, DR. LON LYNN, AS A PROFESSIONAL MEDICAL DOCTOR,
KAREN HARROD TOWNSEND, Individually, KAREN HARROD TOWNSEND AS EMPLOYEE OF CPCS
PAULA POWELL, Individually, PAULA POWELL AS FBCCP FINANCIAL SECRETARY EMPLOYEE, PAULA POWELL AS CPCS SCHOOL BOARD MEMBER,
CARL (BUDDY) RAWLS, Individually, CARL(BUDDY) RAWLS, AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, AND DEACON
DUANE MILFORD, Individually, DUANE MILFORD AS LONG RANGE PLANNING COMMITTEE MEMBER OF FBCCP, AS PERSONNEL COMMITTEE MEMBER AS CHAIRMAN,1997, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,
KAREN JEFFERS, Individually, KAREN JEFFERS AS EMPLOYEE AS SCHOOL PRINCIPLE OF CPCS,
GAYLE LYNN, Individually, GAYLE LYNN, AS EMPLOYEE AS DEAN OF STUDENTS CPCS,
APRIL BECK, Individually, APRIL BECK, AS EMPLOYEE OF CPCS
JIM LEAHY, Individually, JIM LEAHY AS PERSONNEL COMMITTEE CHAIRMAN OF FBCCP, JIM LEAHY AS DEACON FBCCP,
JOE KAREAS, Individually,
MICHAEL JOHN CORBIN, Individually, MICHAEL JOHN CORBIN AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP,
JACKIE CORBIN, Individually, JACKIE CORBIN AS CPCS SCHOOL BOARD MEMBER 2007
JOYCE MEISTER, Individually, JOYCE MEISTER, AS EMPLOYEE OF CPCS
JACKIE HOWLETT, Individually, JACKIE HOWLETT AS CPCS SCHOOL BOARD MEMBER, JACKIE HOWLETT AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP,
MIKE SMOAK, AS Individually, MIKE SMOAK AS CPCS BOARD MEMBER, 1999-2007
MIKE SHAR, Individually,
THE FIRST BAPTIST CHURCH OF CITRUS PARK BOARD OF DEACONS OF 1999-2000-2001-2002-2003-2004-2005-2006
DON BECK, Individually, DON BECK, AS DEACON,
JOHN COLLINSON, Individually, JOHN COLLINSON, AS DEACON,
BILL CRAFT, Individually, BILL CRAFT, AS DEACON, BILL CRAFT AS 2007

CHAIRMAN OF THE FINANCE COMMITTEE
 ED HOPKINS, Individually, ED HOPKINS, AS DEACON,
 JERRY MILLER, Individually, JERRY MILLER, AS DEACON,
 WILSON SMITH, Individually, WILSON SMITH, AS DEACON
 DAVID POWELL, Individually, DAVID POWELL, AS DEACON, (Inactive 2007)
 MIKE POWELL, Individually, MIKE POWELL, AS DEACON
 MIKE HOLNESS, Individually, MIKE HOLNESS, AS General Member
 MARK JEFFERS, Individually, MARK JEFFERS, AS General Member
 DAVE FERGUSON, Individually, DAVE FERGUSON, AS PASTOR/OFFICER et al.
 AS THESE SELECT ASSOCIATES AND OFFICERS ABOVE AS ALSO GENERAL
 MEMBERS OF THE CORPORATION ALLEGING TO ACT LAWFULLY
 AS d/b/a,
 FIRST BAPTIST CHURCH OF CITRUS PARK, (FBCCP) and CITRUS PARK
 CHRISTIAN SCHOOL, (“CPCS”), A MINISTRY OF FBCCP, a Corporation per
 F.S.617, “Not for profit”
 AND AS ALSO THESE as a “Sect Class” and with the
 THIRD PARTY INDIVIDUALS, as “Sect Agents Class” a.k.a. (Black/Blue) as
 AGENTS AND OR AGENCIES OR OTHERS AS “PERSONS” WHO TORTFULLY
 AND NEGLIGENTLY INTERFERE IN CONTRACT AND BY-LAWS “RIGHTS” AS

CHARLES H. SCRUGGS III., **CIRCUIT CASE NO. 05-0911**
Individually, **DIVISION G**
CHARLES H. SCRUGGS, III. ESQUIRE, **APPEALS CASE:2D06-2811**
As attorney at law/ former Circuit Judge
CHARLES H. SCRUGGS, III, P.A., A Professional Association Law Firm,

KAREN HARROD TOWNSEND, Individually, **CASE NO 05-9605 Civil**
KAREN HARROD TOWNSEND AS
EMPLOYEE OF (CPCS) OF THE FBCCP **Per R.O.C.P 1.540 an Independent**
ACTION and of
02-4974, Family Court and
APPEALS CASE: 2D06-3469
FLORIDA S.Ct. SC07-1181
FROM CASE NO: 01-15814 and
related CASE NO: 01-15813 and
02-03812

and
STEVEN TYLER HARROD, Individually,
DONALD HARROD, Individually,
NORMA HARROD, Individually,

JOHN A. GRANT, JR. Individually, JOHN A. GRANT, JR. AS REGISTERED AGENT
 OF FBCCP/CPCS CORPORATION, JOHN A. GRANT, JR. Attorney at Law,
 JOHN GRANT AS NOW FORMER STATE OF FLORIDA SENATOR
 DUANE JANSSEN, Individually, and DUANE JANSSEN AS C.P.A. and DUANE
 JANSSEN AS C.P.A. for JANSSEN & HORGAN as NOW JANSSEN & IGOR
 C.P.A., P.A.
 JANSSEN & IGOR. (Formerly Janssen & Horgan) C.P.A.’s, P.A. a Florida Corporation
 UTICA INSURANCE COMPANY OF NEW YORK,
 CHARLES DENNY, IV, Individually, CHARLES DENNY, IV, AS ATTORNEY AT

LAW FOR THE FIRM OF DICKINSON & GIBBONS P.A.,
THE LAW FIRM OF DICKINSON & GIBBONS, P.A. ATTORNEYS AT LAW,
A. JAMES ROLFES, Individual, A. JAMES ROLFES, AS ATTORNEY AT LAW,
A. JAMES ROLFES, AS ATTORNEY OF THE LAW FIRM OF DICKINSON
& GIBBONS, P.A. ATTORNEYS AT LAW,
DREW GARDNER, AS Individual, DREW GARDNER AS ATTORNEY AT LAW
FOR THE CHRISTIAN LAW ASSOCIATION
THE CHRISTIAN LAW ASSOCIATION, A FLORIDA CORPORATION
DAVID GIBBS, III, Individual, DAVID GIBBS, III, AS ATTORNEY AT LAW,
GIBBS LAW FIRM. P.A., DAVID GIBBS, III, AS ATTORNEY AT LAW, OF
THE CHRISTIAN LAW ASSOCIATION
STACEY TURMEL, Individually, STACEY TURMEL AS ATTORNEY AT LAW, OF
STACEY TURMEL, P.A., THE LAW FIRM OF STACEY TURMEL, P.A.
THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA UNDER THE
CARE AND SUPERVISION OF JEB BUSH AND CHARLIE CRIST,
MR. CHARLIE CRIST, Individually, MR. CHARLIE CRIST, AS IN THE OFFICIAL
POSITION AS THE ATTORNEY GENERAL FOR THE STATE OF FLORIDA,
THE OFFICE/DEPARTMENT OF THE ATTORNEY GENERAL FOR THE STATE
OF FLORIDA
THE OFFICE/DEPARTMENT OF THE BOARD OF EDUCATION FOR THE STATE
OF FLORIDA
Mr. CHARLIE CRIST, AS FORMER DEPARTMENT OF EDUCATION
COMMISSIONER
Mr. TOM GALLAGHER, Individually, MR. TOM GALLAGHER, AS IN THE
OFFICIAL POSITION AS THE CHIEF FINANCIAL OFFICER OF THE
STATE OF FLORIDA DEPARTMENT OF FINANCIAL SERVICES, and
THE DEPARTMENT OF FINANCIAL SERVICES,
THE DEPARTMENT OF CHILDREN AND FAMILIES OF THE STATE OF
FLORIDA,
DAVID GEE, AS SHERIFF OF HILLSBOROUGH COUNTY FLORIDA, (HCSO)
DAVID GEE, Individually,
DAVID GEE, AS EXECUTIVE OFFICER OF THE COURT OF HILLSBOROUGH
COUNTY
GARY TERRY, Individual,
GARY TERRY, AS HCSO DEPUTY- (Major/now Coronal)
JOE HOWLETT AS HILLSBOROUGH COUNTY SHERIFF DEPUTY,
JOHN CAMPO, Individual, JOHN CAMPO, AS HCSO DEPUTY
RICHARD WALKER, Individual, RICHARD WALKER, AS HCSO DEPUTY
CAL HENDERSON, AS Past SHERIFF OF HILLSBOROUGH COUNTY, FLORIDA,
CAL HENDERSON, Individually,
WALTER HEINRICH, AS Past SHERIFF OF HILLSBOROUGH COUNTY FLORIDA,
WALTER HEINRICH, Individually,
MIKE SMOAK, A HCSO DEPUTY AND
SCOTT WELLINGER, Individually, SCOTT WELLINGER, AS HCSO DEPUTY
LUTHER CORE, Individually, LUTHER CORE AS HCSO DEPUTY
PAUL J. GUARINO, Individually, PAUL J. GUARINO, AS HCSO DEPUTY,

HARRY HOOVER, Individually, HARRY HOOVER, AS HCSO DEPUTY,
KEVIN L. BODIE, Individually, KEVIN L. BODIE, AS HCSO DEPUTY,
J.R. BURTON, Individually, J.R. BURTON, AN HCSO DEPUTY
JAMES (JIM) COATS, Individually, JIM COATS AS SHERIFF OF PINELLAS
COUNTY FLORIDA, (PCSO)
EVERETT RICE, Individually,
EVERETT RICE, AS FORMER SHERIFF OF PINELLAS COUNTY
TIM JEFFERS, as PINELLAS COUNTY SHERIFF DEPUTY,
JOSEPH A. GILLETTE, Individually, GILLETTE AS PCSO DEPUTY,
THE PINELLAS COUNTY SHERIFF'S OFFICE (PCSO)
BOB WHITE, AS SHERIFF OF PASCO COUNTY FLORIDA,
MICHAEL JOHN CORBIN, AS PASCO COUNTY SHERIFF DEPUTY DETECTIVE,
THE DEPARTMENT OF THE PASCO COUNTY SHERIFF,
THE CHIEF OF POLICE OF TAMPA, FLORIDA, and
POLICE OFFICER JOE KAREAS OF THE CITY OF TAMPA,
THE CITY OF TAMPA
CYNTHIA BARNARD SANZ, Individually,
CYNTHIA BARNARD SANZ AS
SPECIAL AGENT SUPERVISION FOR THE FLORIDA DEPARTMENT OF
LAW ENFORCEMENT,
MICHAEL O'CONNELL, Individually,
MICHAEL O'CONNELL, SPECIAL AGENT FOR THE FLORIDA DEPARTMENT
OF LAW ENFORCEMENT,
MR. GUY TUNNELL, FORMER COMMISSIONER, FLORIDA DEPARTMENT OF
LAW ENFORCEMENT, NOW AS
MR. GERALD BAILEY COMMISSIONER, FLORIDA DEPARTMENT OF LAW
ENFORCEMENT,
THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT
CURTIS BAUGHMAN, Individually,
NANCY LOPEZ, Individually,
CURTIS BAUGHMAN AND NANCY LOPEZ AS EMPLOYEES OF VICTIMS
ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA,
THE DEPARTMENT OF VICTIMS ASSISTANCE
MARK A. OBER, Individually, MARK A. OBER AS STATE ATTORNEY OF
FLORIDA,
BOB PETSCHOW, individually and BOB PETSCHOW, AS ASSISTANT TO THE
STATE ATTORNEY
CHUCK HOLLAND, individually and CHUCK HOLLAND AS ASSISTANT TO THE
STATE ATTORNEY
CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY
FLORIDA CIRCUIT CIVIL COURTS,
MANUEL MENENDEZ JR. Individually,
JAMES ARNOLD, Individually,
JAMES ARNOLD, A CIRCUIT COURT JUDGE OF HILLSBOROUGH
COUNTY FLORIDA,
WAYNE TIMMERMAN, Individually,

JUDGE WAYNE TIMMERMAN A CIRCUIT COURT JUDGE OF HILLSBOROUGH
COUNTY FLORIDA,
RAUL PALOMINO, Individually,
JUDGE RAUL PALOMINO, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
FRANK GOMEZ, Individually,
JUDGE FRANK GOMEZ A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
MONICA SIERRA, Individually,
JUDGE MONICA SIERRA, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
RALPH STODDARD, Individually,
JUDGE RALPH STODDARD, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
GREG HOLDER, Individually,
JUDGE GREG HOLDER, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
MARVA CRENSHAW, Individually,
JUDGE MARVA CRENSHAW, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
REX M. BARBAS, Individually,
JUDGE REX M. BARBAS, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
MARTHA J. COOK, Individually,
JUDGE MARTH J. COOK, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
RAQUEL A. RODRIQUEZ, Individually,
RAQUEL A. RODRIQUEZ AS GENERAL COUNSEL TO THE OFFICE OF THE
GOVERNOR OF THE STATE OF FLORIDA
BROOKE S. KENNERLY, Individually,
BROOKE S. KENNERLY AS EXECUTIVE DIRECTOR FOR THE JUDICIAL
QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA,
THE JUDICIAL QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA,
THE FLORIDA BAR,
THE OFFICE OF THE FLORIDA BAR OFFICER OF EXECUTIVE DIRECTOR,
JOHN F. HARKNESS, JR, INDIVIDUAL,
JOHN F.HARKNESS, AS EXECUTIVE DIRECTOR OF THE FLORIDA BAR
JOHN BARR, INDIVIDUALLY, JOHN BARR AS THE FLORIDA BAR,
COMPLAINTS IN PERSON EMPLOYEE
THE OFFICE OF THE PRESIDENT OF THE FLORIDA BAR,
HENRY M. COXE III, INDIVIDUAL,
HENRY M. COXE III, AS PRESIDENT OF THE FLORIDA BAR
THE FLORIDA BAR OFFICER OF TAMPA BRANCH OFFICE
EXECUTIVE/DISCIPLINE DIRECTOR AS BRANCH STAFF COUNSEL,
TONY BOGGS, INDIVIDUALLY,
TONY BOGGS, AS THE FLORIDA BAR DISCIPLINARY PROCEEDURES

EMPLOYEE
THE FLORIDA BAR TAMPA INTAKE STAFF COUNSEL EMPLOYEE, MS.
“DOE” LIEMAN, MS. “DOE” LIEMAN, Individually,
THE FLORIDA BAR TAMPA INTAKE STAFF EMPLOYEE MS. JANE CRISTY and
Ms. JANE CRISTY, Individually
THE STATE OF FLORIDA, and
THE SHERIFF OF SANTA ROSA COUNTY, Individually and AS SHERIFF,
SANTA ROSA COUNTY DEPUTY DETECTIVE RYAN, Individually and AS Deputy
SANTA ROSA COUNTY DEPUTY WHEELER, Individually and AS Deputy
SANTA ROSA COUNTY SHERIFF’ DEPARTMENT
SANTA ROSA COUNTY, OF THE STATE OF FLORIDA
HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA
THE HILLSBOROUGH COUNTY FLORIDA BOARD OF COUNTY
COMMISSIONERS JOINTLY AND INDIVIDUALLY AS,
ROSE FERLITA,
KEN HAGAN,
KEVIN WHITE,
AL HIGGINBOTHAM,
JIM NORMAN,
BRIAN BLAIR,
MARK SHARPE AND
PAT BEAN, AS HILLSBOROUGH COUNTY ADMINISTRATOR
PAT BEAN ATTORNEY AT LAW AND
PAT BEAN, INDIVIDUALLY
THE SECOND DISTRICT COURT OF APPEALS and JUDGES OF THE SECOND
DISTRICT COURT OF APPEALS AS “PERSONS” JOINTLY AND AS
“PERSONS” INDIVIDUALLY AS,
STEVAN T. NORTHCUTT,
CHARLES A. DAVIS,
CRAIG C. VILLANTI,
DOUGLAS A. WALLACE,
EDWARD C. LaROSE,
CAROLYN K. FULMER,
CHRIS W. ALTENBERND,
PATRICIA J. KELLY,
JAMES BIRKHOOD, INDIVIDUALLY AND AS CLERK OF THE SECOND
DISTRICT COURT OF APPEALS, LAKELAND FLORIDA
THE FLORIDA SUPREME COURT, AND JUDGES OF THE FLORIDA SUPREME
COURT AS JUDGES AND AS “PERSONS” JOINTLY AND “PERSONS”
INDIVIDUALLY AS,
CHIEF JUDGE FRED LEWIS,
CHARLIE T. WELLS,
HARRY LEE ANSTEAD,
BARBARA J. PARIENTE,
PEGGY A QUINCE,
RAOUL G. CANTERO,

KENNETH B. BELL
KMART CORPORATION also d.b.a. SEARS HOLDING COMPANY, INC.(Kmart)
JOE PALKO, Individual, JOE PALKO, EMPLOYEE AS Vice President (Kmart)
SEARS HOLDING COMPANY
RANDY BRIGHT, Individual, RANDY BRIGHT, (Kmart) EMPLOYEE AS
REGIONAL COACH,
KEITH JOHNSON, Individual, KEITH JOHNSON, (Kmart) EMPLOYEE AS
REGIONAL HUMAN RESOURCES DIRECTOR,
SHANE PEARSON, Individual, SHANE PEARSON, (Kmart) EMPLOYEE AS LOSS
PREVENTION COACH,
KATHERINE CUNNINGHAM, Individual, KATHERINE CUNNINGHAM, (Kmart)
EMPLOYEE AS DISTRICT COORDINATOR SECRETARY
DANIEL J. GENTILE, Individual, DANIEL J. GENTILE, (Kmart) EMPLOYEE AS
DISTRICT COACH
DOUG LIVINGSTON, Individual, DOUG LIVINGSTON, AS KMART EMPLOYEE
LOSS PREVENTION COACH, AT STORE 3092,
ROY ALLEN, Individual, ROY ALLEN, KMART EMPLOYEE AS ASSISTANT
COACH, AT STORE 3092,
DR. LINDA ROWE CAMPBELL, Individual, DR. LINDA ROWE CAMPBELL,
(Kmart) EMPLOYEE AS PHARMACIST AT STORE 3092
BARBARA BOOTH, Individual, BARBARA BOOTH, (Kmart) EMPLOYEE AT
STORE 3092
MIKE SHUMATE, Individual, MIKE SHUMATE, AS AN OFFICER OF THE UNITED
STATES COAST GUARD now retired,
“DOE”, as any and all Insurance and or Bonding Companies, Carriers or the like for any
Defendant or representative of any Defendant herein, past, present or future.
“DOE”, as any yet unknown accomplice to the acts of defendants herein,
MEDIA GENERAL OPERATIONS NEWSPAPER, AND AS SUBSIDIARY THE
TAMPA TRIBUNE,
JANET E. COATS, Individually, JANET E. COATS AS EXECUTIVE EDITOR AND
VICE PRESIDENT OF THE TAMPA TRIBUNE
MICHELLE BEARDEN, Individually, MICHELLE BEARDEN, AS TAMPA
TRIBUNE REPORTER/EMPLOYEE
THE SAINT PETERSBURG TIMES,
BILL COATS, Individually, BILL COATS, AS A SAINT PETERSBURG TIMES
EMPLOYEE/REPORTER
PAUL TASH, Individually, PAUL TASH, AS SAINT PETERSBURG TIMES,
EDITOR, CEO and CHAIRMAN
AS DEFENDANTS,

AMICUS CURIAE BRIEF
BY RANDALL TOWNSEND RESPONDENT PER F.S. 617, PRO SE
FOR ALL PLAINTIFFS ABOVE HEREIN

AND

**MOTION FOR DISCRETIONARY JURISDICTION TO
OBTAIN WRITS OF:
WRIT OF HABEAS CORPUS;
CERTIORARI;
PROHIBITION;
AND
MANDAMUS
AND
CORAM NOBIS
TO STOP ACTUS REUS
AND
TO STOP MENS REA
FELONIES UNDER COLOR OF LAW.**

9-11 Operator asks, “9-11, WHAT IS YOUR EMERGENGY”!

**“Townsend as a Father and elected Church Leader” for victims states--
THIS FLORIDA SUPREME COURT AND THEIR AGENTS AND “OTHERS”
AS THESE DEFENDANTS KNOWINGLY AND INTENTIONALLY VIOLATE
F.S.§877 AND CONTINUE IN THEIR ABDUCTION AND DEPRIVATIONS OF
F.S.§827 KIDS AND F.S.§617 VESTED CONTRACT RIGHTS, BY CONSPIRED
FRAUDS, OMISSIONS OF TRUTHFUL DISCLOSURE AND THEIR
UNCONSTITUTIONAL CRIMINAL ENTERPRISE NOW FULLY EXPOSING
THEIR CONSPIRING:**

- 1. Still interfering with or “impeding” Religious Contract Duties and
Constitutional and Contract Rights causing deprivations;**
- 2. Concealing ongoing violations of Bar Members and other attorneys
violation of Contracts and Rules of Law towards their own clients as
Respondents to multiple litigation deprivations even from these
same attorneys Superior Bar Officers and Judges;**

- 3. Concealing unlawful MENS REA criminal acts of “Law Enforcers” and “Politicians” and “Others”;**
- 4. Concealing ongoing Felonies of Theft, Fraud, Child Interference and Detainment and Hate Crimes violations of victims Rights as revealed by the Townsend son and daughter since their unlawful abduction writing this 10/20/99 letter who at age 16 and 14, being “victimized and bullied” by criminal plots of “government persons” since 1988:**

**“Dad,
Please don’t be mad at us! I don’t know what other option I/we have. It’s not fair just not 2 C mome either! N- ways we’ll C U soon + we’ll give U a call later! OK? Take Care of Peaches, Whisper (family cats) + Shaddow (family dog). Jason needs U 2 set up his bunk-bed in his room, If not we’ll get it later + set up the dinette set in the kitchen too!**

**Heart- U ~ C-U Soon
Heart- Jen”**

Unlawfully for extortion keeping this father from his daughter since 11/8/2002, and still causing threats to his son and daughter by USING INTENTIONALLY UTTERED FALSE REPORTS AND ABUSE OF PROCESS BY NOW “DISBARRED” ATTORNEY HEATHER GRAY (SC09-1121) AND HER CO-CRIMINAL PARTICIPANTS AS DEFENDANTS ABOVE HEREIN AND “OTHERS” INTENTIONAL MENS REA ACTS.

While Citizens nor the parents may never know who abducted the Aisenberg Baby in 11/1999, in this Gray ET Al case, we know it is the same HCSO Col. Gary Terry supervising and admitting by himself and HCSO Corp. Renato Martinez it is his Detectives (Smoak/Burton/Bodie ET AL) and I.A. of HCSO ET AL., Sheriff Gee, Judges, Grant, Bush(s), Pat Bean, Jim Norman, State Attorney Mark Ober ET AL, Jeffers/Beck ET AL, Crist and “Others” that are detaining and “impeding” Plaintiffs and abducting 10/21/99, Townsend from his kids as Gray, Scruggs and “Others” all under contract agreed to advocate their clients Rights, as you as her Superior Officers conspire to ignore her criminal conspiracy and “Quid Pro Quo” payoff as a “public defender” as this also assists the criminal enterprise defendants and “Others Doe” TO CONCEAL ILLEGAL PLOTS OF: DRUG USE; FRAUD; DEFAMATION; DETAINMENT; UNJUST ENRICHMENT; CRIMINAL USUARY; LARCENY; “UNDUE AND UNEQUAL PROCESS”; BREACH OF

**CONTRACTS; GOVERNMENT OFFICERS UNDUE PROCESS
INTRUSION IN VIOLATION OF RELIGIOUS CONTRACTS AND
UNITED STATES AND FLORIDA CONSTITUTIONAL RIGHTS;
CHILD ENDANGERMENT; RETALIATORY INTERFERENCE
WITH CHILD CUSTODY; CHILD ABDUCTION; BATTERIES;
ATTEMPTED MURDER; VARIOUS CONSPIRED FRAUDS TO
PLAINTIFFS AND JUSTICE; AND CONSPIRED MENS REA
DEPRIVATION OF AND AS “HATE CRIMES” IMPEDING CIVIL
RIGHTS INCLUDING FAITH BASED RELIGIOUS RIGHTS,
AS THIS GRAY CONSENT JUDGEMENT AND JUDGE COOK’S
DISMISSAL AND BIASED DELAY TACTICS OF THE 2DCA OF
CIVIL COMPLAINT 06-6005, 02-4974, 02-03812, 05-9605, 05-0911, and
other claims per F.S.768.28(6) as listed above, AGAINST HEATHER
GRAY ET AL IS ANOTHER “GOVERNMENT PARTICIPANTS
PERSONS” RICO F.S. §501.201-213, CONSPIRED UTTERING
FORGED INSTRUMENTS “UNDER COLOR OF LAW” (42 U.S.C.S.
§1893) TO CONCEAL INTENTIONAL TORTS AGAINST THESE
RESPONDENTS NOW PLAINTIFFS NOW APPELLANTS.**

This is Florida, U.S.A., not the Bush attacked Saddam’s Iraq or China!

This Florida Supreme Court and Governor ET AL has a Duty to

not Conceal or Assist ongoing Criminal Acts of itself or its Agents upon our Florida Citizens per Florida Constitution Article II. Sect. 8. Ethics In Government.

What would you do if Governor Jeb Bush and his biased “Coat Tail Charlie” formerly “Chain Gang Charlie” Attorney General Crist Illegally joined a “RICO” Gang in violation of F.S.914 (Witness Tampering) even using said “Tampering to gain their Elected Office”, Rather than follow Florida Constitution Article IV. Section 1. Governor and F.S.§943.03(2) (FDLE Powers), and Attorney General F.S.§16.56 (Statewide Prosecutor) Intentionally and directly conspired and abducted your kids (Florida Constitution Article I. Sect.17) and U.S. Supreme Court Rights (Florida Constitution Article I. Sect. 2) because you won and would not let his brother George W. Bush be President in 2000? Then as President this Brother directly assists “Impeding” Federal Protecting of said Rights even sought as protected from a Saddam by the like acts. Bush reassigns F.B.I. Tampa Director and fires U.S. Attorney (Tampa).

If Attorney Gray had: abducted your kids; ignored your pleas to help you and your kids you know still are being threatened; assisted persons since 3/14/2003 to ruin lives; and charged you ransom extortion

money to do this and still helps co-conspirators abuse your kids; you would not just be satisfied with a “Consent Judgement” knowing it is all a part of the ongoing crime she was to expose when she was hired.

This is what is the same plots you know since the Townsend kids and Church/School kids were detained and abducted since 9/8/1999, when FBCCP Supreme Court Elected Townsend since 1/1995 said: “Follow the Laws”; “Follow the By-Laws”; “Show me the money trail”; “Stop the building Scheme Frauds”; “Stop Lying to my family and Church”; Expose the wrong “Lane, Williams, Popper, Chapin ET AL Scheme”.

Where is the “equal and due process” and honor in your rulings?

FACT—Since a 1/22/95 FBCCP Business Meeting Confession of Violations of F.S.§870.02, (“Unlawful assembly” of the “Sect”) by Administrative “pastor” Elbert Nasworthy, Secretary Paula Powell and “new pastor” Ron Beck FBCCP and “Others DOE”, these FBCCP Members through their By-Laws process require Randall Townsend to Investigate the Charges per his Nominations Committee Supreme Court Authority and Duty per the FBCCP By-Laws and Constitutional Laws.

This 1/95 Admission of diversion of funds for self-dealing and tax evasion proved a “Sect” of unknown participants was in violation of FBCCP Practices Honoring a Sovereign ET AL (God, Belief and

Practices) that had been determined by over 40 years of family members votes. The “New” in 1995 FBCCP Leadership is still trying to fraud our Sovereign ET AL and the investigation of their violations of By-Laws Practices and the “Warner Vision” by Townsend ET AL is unlawfully “impeded” by non members Deputies Jeffers/Howlett ET AL despite many examples of “process abuse under color of law” violations as listing same here would make this Brief not as brief as it is.

The FBCCP Members and or as “Public Citizens” as Lawyers, C.P.A’S, Experts, judges, politicians, “true law enforcers” and citizens have all “cried odious and outrageous” when reviewing these facts yet these Defendants and “others” continue frauds and deprivations even when the partial documents showing frauds of the 1/95 to still now “Jeffers/Powell” ET AL Sect” are exposed finally in 2006 by the Judge Crenshaw ORDER who then takes the 5th. Exposed “pastors” and “others” were fired but the conspired frauds by Jeffers ET Al remains.

FACT—WHAT THIS FLORIDA SUPREME COURT AND ITS AGENTS AND “OTHERS” KNOWINGLY AND INTENTIONALLY TRIED TO CONSPIRE TO CONCEAL WITH P.C.A. RULINGS TO CONCEAL THE BAR CRIMININAL ENTERPRISE TOWNSEND ALLEGED AND PROVED BY CHAPIN/POPPER/CRIST/BUSH(s)/FLORIDA BAR AGENTS ET AL IS NOW

PROVED BY HOW THIS SUPREME COURT HAS DISBARRED HEATHER GRAY WHO WAS TO LITIGATE “LIBERTY” FOR HER CLIENTS AS TOWNSEND AND TOWNSEND ET AL. AGAINST HER CO-PARTICIPANTS.

THESE CO-PARTICIPANTS CANNOT “TRAIN” AND QUID PRO QUO REWARD GRAY TO VIOLATE THE CLIENTS RIGHTS, LAWS, CONTRACTS AND CONSTITUTIONS AND THEN ADMIT SHE IS DAMAGED BY THEIR “RISK” WHILE AT THE SAME TIME DENY HER CLIENTS ARE NOT DAMAGED BY THEIR SAME SELF REWARDING “UNLAWFUL ACTS”.

SO NOW THE FEDERAL BUREAU OF INVESTIGATIONS (F.B.I.) AND D.O.J. HAVE MONELL PROOFS “OF THE CONSPIRACY AFOOT” OF RICO ACTS, CRIMES AND FRAUDS TOWNSEND ALLEGED WERE EXTORTION PLOTS CONNECTED TO THE ABDUCTION OF: HIS CHILDREN; CHURCH BY-LAWS PROCESS; BUSINESS AND CONSTITUTIONAL RIGHTS; TO DENY TOWNSEND AND AS HIS APPELLANTS OUR “HONEST DAY IN COURT; OR EVEN IN OUR CHURCH PER OUR BY-LAWS CONTRACT PROCESS BY THE CHURCH MEMBERS AS OUR OWN SOLVENT JURY WITHOUT ARREST OR EXTORTION BY JEFFERS/HOWLETT/SMOAK ET AL.” UNLAWFULLY DEFAMING TOWNSEND WAS “A LIAR”, “VIOLENT”, “DANGEROUS”, “DANGEROUS WITH GUNS” AND “OTHER” NOW PROVED FALSE REPORTS AS EVEN USED BY JEFFERS ET AL IN THE COURTS AS AS judge PALOMINO DENIED IN CASES 01-15813 and 01-15814 (11/15/2001) OR AS ATTORNEY DENNY USED AS HIS FIRST AND ONLY DEFENSE (2003) OPERATING ONLY FOR THE SECT AND SECT ET AL AGENTS .

THE FBCCP OFFICERS ARE SUBJECT TO THE VOTE OF MEMBERS.

FACT—THE FIRST BAPTIST CHURCH OF CITRUS PARK (FBCCP) BY-LAWS STRICTLY PROHIBITS ANY AND ALL “IMPEDING” OF ITS RIGHTS AND MEMBERS RIGHTS FROM “IMPEDING” FROM “NON MEMBERS” OR FROM ANY MEMBER IN VIOLATION OF THE RIGHTS AS STATED IN THE BY-LAWS. The Florida Constitution also strictly prohibits said “impeding” and “sect” acts against “public morals”. The case laws stated below herein not only expose what a “jury” would show as “public morals” but by the government courts shows what is By-law unlawful unconstitutional practices by the co-participants in these cases.

FACT—While individuals may be members of FBCCP no “person” in the role of as a “deputy” or any “government agent” has any legal standing to usurp or detain the authority, duty and rights of the By-Laws, FBCCP as a Corporation, or of any individual member. Also no “Sect” has the right to fraud or unlawfully act to dishonor another. Discipline of members is to be per the By-Laws process. These “Government Agents” are not to “impede” FBCCP By-Laws, violate 1ST Amendment Rights or “detain” their Church Supreme Court Officer or “abduct” their Superior Church Officer’s kids in order to conceal their criminal enterprise. The unlawful abductions as Jeffers/Terry ET AL wrote of in the 8/26/98 HCSO Gary Terry letter and affirmed by Sheriff

Everett Rice, 9/11/1998 for Detaining Jeffers and themselves practiced still continue as of this writing as Defendants obstruct the Public Trust of Florida Constitution Article II. Sect. 8.(c) for personal gain.

FACT—Per Halkey-Roberts Cor. Mackal 641 So2d 445, 447 (Fla. 2 DCA 1994), “Breach of Fiduciary Duty is an intentional Tort. Per Palafrugell Holding, Inc. v. Cassel 854 So2d 225 (Fla. 3 DCA 2003) the court said a “claim for breach of fiduciary duty may arise out of either negligence or intentional conduct.” Per First Union Bank v. Turney 824 So2d 172, 189 (Fla. 1st DCA 2001), “The mere silence by one under such a fiduciary duty to disclose is fraudulent concealment”. Per Morgan Stanley DW Inc. v. Halliday 873 So2d 400, (Fla. 4th DCA 2004) “Fiduciaries are generally not able to avoid the negligent performance of their own special responsibility by handing them off to someone else.”

Per Avila South Condominium Association Inc. v. Kappa Corp. 347 So2d 599, 6006 (Fla. 1977) and First Union National Bank v. Turney 824 So2d 172, 188 (Fla. 1st DCA) review denied, 828 So2d 385 (Fla. 2002), per the Contracts and “Oaths” of these Defendants Duty and Breaches of Fiduciary Duty as per Avilia:

“While occupying such a fiduciary relationship, the officers and directors of a corporation are precluded from receiving any personal advantage without the fullest disclosure to and assent of, all concerned.”

Per PROSSER, LAW OF TORTS 846 (West 4th ed 1971):

“All persons who actively participate in a tortious act, or who aid or encourage the wrongdoer in furtherance of a common plan or design to commit the tortious act, are equally liable with the wrongdoer for the act. Those who ratify and adopt the wrong doer’s act that are done for their benefit are also equally liable with the wrongdoer for the act. Traditionally, all such aiders and abettors are joined as defendants in one action and each is held liable for the entire damages.”

This “Governmental Intrusion Right of Privacy Article I, §23 Florida Constitution issue was clearly defined by this Florida Supreme Court in Winfield 477 So2d at 547. Additionally, the FBCCP By-Laws clearly prohibit non members “intrusion” or “impeding” the By-Laws as Deputy Jeffers ET AL Sect has done since his Under Color of Law acts began to counter the legal standing of Townsend per F.S.§617.0304(3) and (2)(a), standing still then and now per the FBCCP By-Laws.

Per State law the “law enforcers” illegally used and still use the fraudulent Under Color of Law acts of Deputy Tim Jeffers and his wife, Karen Jeffers, Deputy Joe Howlett, Deputy Mike Smoak, and their conspiring with “others” to violate and “Scam”: voters; THE FBCCP Corporation; Townsend; His Children; Members and Tax Payers.

FACT- AT NONE OR MOST TIMES SINCE ABOUT:

1. 1988, did Agents of this Supreme Court Follow the Law when Attorney David H. Popper did Tortfully delay all Townsend Business

Rights. Despite getting in 1989 an Order from Judge Muszynski to set up a “receiver” for “The Sabal Joint Venture” Business records which Popper and Chapin never did they said, “Stop all Business until we have Sabal records production and stop contacting potential witnesses including customers”. Sabal Attorney Williams and Popper refused to obey the Receiver Order and refused Lane Document Production without a Subpoena and lied about what the Sabal Documents actually never contained and protected for only Lane ET AL. Popper and Chapin did further violate and threaten contract rights of their client Townsend and even 5/19/98, after the Court Hearing with Judge Stroker, quoting Appellant Townsend’s INITIAL BRIEF in case SC98-1966 and SC98-2111, Popper and Chapin:

“confessed to but also apologized for their actions and Appellee Popper said he would file charges of slander against Appellant Townsend if any action to proceed with this case was taken. It should also be said that Appellee Chapin tried to bribe Appellant and stated he would be willing to get his wife and his son to assist Appellant in recouping Appellants financial losses if Appellant dropped the case and did not file this appeal. Because I will not be bribed nor threatened this appeal is filed. Judge Stroker was informed of the actions by Appellee’s and still refused the rehearing.”

Townsend was never compensated for his (1) work per the Sabal Contract nor for his (2) “not doing all business for 4+ years based on the

attorney/Lane fraud of a “non compete clause” or (3) “loss of business” while Popper, Chapin, Williams and Lane ET AL did not obey the Contract and law as these and now all co-participants still continue their criminal enterprise deprivations to stop Townsends day in court.

On December 17, 1999, The United States Supreme Court wrote the following:

**“Re: Randall C. Townsend v. Bruce E. Chapin, et al. No. 99-7469
Dear Mr. Townsend:**

The petition for a writ of certiorari in the above entitled case was filed October 6, 1999 and placed on the docket December 16, 1999 as No. 99-7469.

A form is inclosed for notifying opposing counsel that the case was docketed.

**Sincerely,
William K. Suter, Clerk by Jeffrey D. Akins Assistant”**

Additionally, Randall C. Townsend v. David H. Popper, et al. 99-7468 was docketed.

On February 22, 2000, the Supreme Court denied hearing these writs.

**FACT- The FDLE, and “Others” have been lawfully advised;
As a result of this May 19, 1998, “admission” and “extortion” Townsend contacted an ole friend within the FDLE who arranged a meeting in Orlando within the top three senior management of the FDLE. Over a lengthy meeting, at three times the FDLE investigator stood, put his hand on his gun and said words as “I have heard enough to arrest all of**

them”. The FDLE Lawyer advised to wait until more information could be gathered and said they would investigate these matters internally. Townsend even agreed to wear a wire and arrange a meeting with all persons so to prove the extortion plot. Since this meeting, the FDLE on the record have been deceptive but privately admit the crimes.

2. June 11, 1999, Governor Jeb Bush has not kept his promise told to Townsend in 1998, at the WTVT-Channel 13 Tampa Town Hall Meeting nor in the meeting update in June 1999, as confirmed by this letter from Reginald J. Brown Assistant General Counsel dated 6/11/99:

“Dear Mr. Townsend:

Thank you for writing Governor Bush about your case against two Florida attorneys. The Governor has forwarded your letter to me for review, and has asked me to respond on his behalf. I am very sorry that you have apparently been the victim of wrongful conduct, and hope that you will be vindicated in the courts if your case has merit. Governor Bush cannot, of course, intervene or comment on your pending case. He would, however, like to let you know that he is committed to reigning in lawyers who abuse and undermine our system of justice.

Thanks for writing, and please do not hesitate to contact the Governor in the future if he can be of any assistance.”

Multiple other updates of facts have been written over the years yet to no avail per the duty this Governor Et AL has practiced in similar cases where Bush/Crist was not known to be “directly/personally” involved to benefit or exposed involved in frauds and wrongdoing by the exposure.

3. 1/1995 HAS THE “SECT” AND “SECT AGENTS” legally

followed the FBCCP By-Laws and “By the State of Florida Law Process” and “Breached the Contract” and illegally “conspired” to not:

A. AS REQUIRED Truthfully Report FACTS OF THE FBCCP

CORPORATION BUSINESS PRACTICES TRUTHFULLY AND WITHOUT DECEPTION TO THE OWNERS OF THE FBCCP AS ITS VOTING MEMBERS in keeping to By-Laws practices and per F.S.§617.0285 per F.S.§607.165(4) but Jeffers ET AL conspire to Violate Townsend and Townsend ET AL acting per F.S.617.0304(3) stating:

“In a member’s proceeding under paragraph (2)(a) to enjoin an unauthorized corporate act, the court may enjoin or set aside the act, if equitable and if all affected persons are parties to the proceeding, and may award damages for loss (other than anticipated profits) suffered by the corporation or another party because of enjoining the unauthorized act.”;

B. 1997, after the “Jeffers Sect” fraudulently fired Pastor Dr. Berry, and before they fraudulently attacked the Townsend family abusing the innocence and Trust of the Townsend wife and kids to destroy the integrity of Randall Townsend even counseling the wife Karen Harrod Townsend: “Law suits were not Biblical”; “to open her own bank accounts”; use the same practices of “fraudulent double books” and “tax frauds” and did unlawful By-Laws counseling and illegal

advice and training by Howlett/Jeffers/Smoak/Baughman/Ober/Bar
ET AL to Karen Harrod Townsend to destroy the marriage all to;
C. Remove Randall Townsend by “Government Persons Frauds” and
“Breach of Contract as the FBCCP By-Laws Process” from his
Elected Positions within the FBCCP and as a Member since 1993 and
therefore each event Townsend or “others” report is illegal per:

**“FIRST FREE WILL BAP. CH. OF BLOUNTSTOWN, INC, v.
FRANKLIN, ET AL.** 4 So2d 390, 148 Fla. 277:

The law appears to be settled that in the absence of a showing of
fraud, collusion or arbitrariness on the part of the church authorities
having jurisdiction of the controversy, the courts will not interfere.”.

Government Agents or “Officers of the Courts” have violated the law
and By-Laws since the first time Jeffers and Howlett gave “Benefit to
Clergy” F.S.§775.03, and ignored the “Voice of these Members” who
cried 9-11 as “Odious and Outrageous fraud” since about 1/1995 at the
FBCCP Business Meeting confession of Nasworthy “Sect” ET AL.

4. 06/1997 through years of litigation to conceal that Townsend
and “others” as “Experts” advised Beck and the Sect that the
18105 Gunn Highway site would not be “permitted” per the
“Quest of the Membership” for Church/School growth as Long
Range Planning Chairman Townsend is still elected to pursue;
5. 1/1995 through current times Townsend and even members of

the FBCCP Finance Committee and Other Members has over 100 times lawfully demanded per the By-Laws and per F.S.

§607.1602(1) and (4) to “inspect” all FBCCP and CPCS Business Records concealed by the “Frauds” and “collusion” of Jeffers ET AL. Jeffers was as a “9-11 Call to a Sheriff” put on the Finance Committee to keep Nasworthy/Powell/Beck “in line” for the membership and not turn Jeffers power into self-serving his sects greed. Townsend has been demanding also to “inspect” the CPCS School files even of his own children since about 1999 and been unlawfully denied all Member/Parent/Nominations Committee/ Respondents Rights. FBCCP Registered Agent Senator Grant has been advised of the “Sect” illegal Acts since about 1995.

On 11/12/2001, Townsend even Faxed a “Demand” to Scruggs to have the FBCCP Business Records produced by the “Sect” for the 11/15/2001, Hearing so to show “Motive, Malice, Conspiracy, Frauds, Violations of the By-Laws and Self Dealings but Scruggs deceitfully failed Townsends Demand. On May 10, 2006: judge Crenshaw finally ordered “partial Discovery” which production produced even greater deprivations and frauds to the Members, Corporation and exposed self dealings that the “Sect and Sect

Agents” had conspired to conceal (As the 10/27/1999, Janssen & Horgan C.P.A. “False Audit letter” Jeffers admitted his “Sect” created to conceal frauds; Crenshaw rewrote the 02-03812 case proving her conspirators intent to conceal the criminal acts of the “Beck/Jeffers/Ex-wife sect agents” even though she was advised judge Holder and as judge Arnold repeated again since 1/2003 and sitting in the Motion hearing for judge Holder (who was attending his Florida Supreme Court Hearing on his plagiarism charges, 2006) had said to merge the cases 05-9605 into 02-03812 as both were based on “Malicious Prosecution” based on the 01-15813 and 01-15814 Pellegrini id. conspiracy of the defendants. Crenshaw resigned before Ordering additionally demanded inspection rights of Members Townsend ET AL. which are still “impeded” unlawfully by “Jeffers-Gray Government ET AL”.

6. 1/1995 through now and on 9/8/1999-Townsend per his FBCCP By-Laws “Duties” said this ultimatum to the “Sect” not knowing all who was or is intentionally involved in the “Frauds” and “Collusion”: “Show me the money” and “Stop the Building Scheme Fraud” and “Stop lying to my family” and “If you take these (Church Keys), you are telling me you do not want the

Truth". Beck took the keys, within the hour conspired with Karen Harrod Townsend and "Sect Deputies ET AL" and since that meeting have "defamed", "impeded" and "Detained" Townsend from his By-Laws Investigation, Rights, Members and His Children and their CO-Members Corporation Rights.

"F.S. §607.1904 Estoppel.—No body of persons acting as a corporation shall be permitted to set up the lack of legal organization as a defense to an action against them as a corporation, nor shall any person sued on a contract made with the Corporation or sued for an injury to its property or a wrong done to its interest be permitted to set up the lack of such legal organization in his defense."

Thus, the admissions by Nasworthy/Powell on 1/22/1995, and by Lane since 11/1987, was sufficient "Estoppel by Deed" and therefore Defendants have no "clean hands" to "impede" the Townsend contracts.

7. October 12, 1999—Karen Harrod Townsend was given a six page letter (Turmel admitted in evidence in 02-4974 connecting the co-conspirators [Again showing tort of Scruggs/Gray ET AL to Townsend and Townsend ET AL as not arguing this letters points nor the collusion and frauds of Affidavits and the Trial Fraud of Cases 01-15813 and 01-15814 were "Arbitrariness" Collusion of the Criminal Enterprise of the "Sect" and "Sect Agents"]) for: her behaviors to change; for her to stop her frauds; for her to get counseling other than the "sect"; or by 10/25/1999,

because of her violent behaviors, she (only) had to “orderly” move out “FOR THE SAKE OF THE KIDS PLEASE DO THIS THE GROWN UP WAY AND NOT LIKE THE CHILD...”.

The following letter was also done by Randall Townsend in 1999:

**“On October 21, at 8 am Karen Jason + Jen I plead with you do not move out until we as a family go to a counselor we all agree on. This step is to major to be done without more discussion. My letter to Karen dated Oct. 11, I prayed would make her get to a counselor and get a proper perspective on all that has happened. Since Karen fights my every work and it will come out has not had Biblical advice on most of what has happened I prayed that would Be the next Step! Get wise council not just from me. The Pastors are Biased and do not know proper advice for any of us at this time. Wake up to the major evidence that shows these Pastors are misguiding a lot of people. Don’t Reject the words of Gary Leatherman who up till now (call Gary work 7278962202, Bible Basics 9202264) you said you respected. He knows the facts and will give you Biblical Advice.
I Love yall too much to not confront sin.
Randy + Dad.”**

Karen decided to continue in her “Frauds” and “Collusion” with the “Sect” as her CPCS employer and October 21, 1999, without notice while Townsend was at work as a Security Guard under Florida Statues 493, Class “D”, working with HCSO Deputies, she “Harrod” moved out with “Aisenberg Collusion” of SECT/HCSO/Bar ET AL detaining the kids, property and reputation of Townsend ET AL still to this writing. As discovered in March 2000, Gary Leatherman was an active front-

man involved in the “Sect Frauds and Collusion” and not the “victim” of Bad Bookkeeping of the Pastors and Staff as Leatherman/Jeffers misrepresented. In 2006, when Crenshaw ORDERED the FBCCP Records Production, Leatherman quickly fled the Church in shame finally exposed what Townsend exposed 3/2000, but was threatened with arrest by Jeffers, Howlett, Smoak, Shumate, Corbin and “others” from the Church Steps if Townsend tried to enter the next Business Meeting as the January 2000 Business Meeting Minutes agreement announced (By sneaking into the service and entering in the closed balcony) in follow up to Townsend making public his charges that the “Pastors Sect were liars, frauds and destroying Townsend’s family for the extortion”.

8. The pattern of “collusion” by “Government Persons” is simple, “impede” Townsend from the Truthful Production and Inspection of all Sabal Business Records or FBCCP Church/School Records that will vindicate Townsend and prove crimes by Lane/Williams/Popper/Chapin through these Gray conspirators and “others” as discovery exposes.

9. March 14, 2003--Gray is being an intentional participant in frauds to her clients at the directive of Scruggs ET AL causing illegal acts of these co-participants and “others Doe” in this case since her first consultation to Townsend and hiring on March 14, 2003, while agreeing

for Townsend to expose the all deprivations of all these related matters.

The Courts (Gomez and 2DCA) have continually reprimanded Gray since back to March 2004 for her failures in representing the kids, Townsend and Townsend ET AL, even Gomez saying in 2004, Gray, “once your in your in”, (as also applies to Fl. Bar ET AL) yet the agents of this Florida Supreme Court (FSCt) as the Florida Bar and other Courts ignore the conspired deprivations Gray ET AL causes her clients as this benefits the Tort Negligence caused by the conspiring agents of this FSCt. This United States Constitution Article III. “Bad Behaviour” is then in a criminal enterprise pattern violation of U.S. Constitution Article XIV, and others State violations of Citizens Contract Rights.

This Florida Supreme Court therefore in dealing with only “part” of the deceptions and illegal acts of Gray conspirators and only allowing her Consent Judgement to be disbarred without legal adjudication per the full “contract duty and authority” of the Florida Supreme Court and its “Government Officers” under its Authority is a continuation of the “Fraud” and “Collusion” and “arbitrariness on the part of the sect church authorities having jurisdiction of the controversy” and a further fraud to the FBCCP Corporation, Members and Tax Paying Citizens. Since about 1995, Government Officer Deputy Tim Jeffers and Deputy

Joe Howlett ET AL still do illegal KOLB id. “collusion”, “frauds” and “arbitrariness” to FBCCP Members and “detained” kids, members and the FBCCP Corporation from its By-Laws Practices, Members “Quest” and Honorable Reputation but for the frauds of these “government” intruders under Color of Law still continuing their collusion and frauds to stop Townsend ET AL from their Missions Religious Quest began by Townsends Uncle (Tyson) as the Founding Missions Pastor in the 1940’s as appointed by the retiring Pastor Dr. Harold Warner and Pastor Dr. Berry as elected by a legal vote of the FBCCP Membership since 1993 to continue the Warner Vision as stated in the FBCCP 50th Anniversary Booklet as: “This vision included a Christian School that would include 12th grade, a larger sanctuary, and a retirement center.”

Claiming “Under Color of Law” Superior Knowledge and Rights as a “Government Officer” Jeffers, Howlett, Smoak, Shumate, Corbin and “others Doe” and through their informed “Superior” Government Agents still cause “illegal detainment” and violate Florida Statues §617; §871.01; §836; §772; §812; 836.05; §837; §843; §876; §877 and “others” showing a §772.102(4) Pattern of Criminal Activity ongoing since R. Townsend first revealed these Harrod felony crimes and “others” as: “attempted murder”; Domestic Violence; child endangerment; battery;

and frauds to citizens, FBCCP members and “alleged law enforcers”.

Since the timely filing of this 06-6005 Complaint Gray has been found in “Default” by the Clerk of Court (June 2007), Judge Gomez (6/26/2007) and Judge Padgett (8/2009), and admitting since 2003, her unlawful acts, yet given “undue and unequal process benefits” by her Co-participants not afforded to her former clients who have clean hands but are still deprivated and threatened by her Co-participants.

Facts even confirm that the unexpected departure from the bench by Judge Sierra was due to the extortion put on her to put on Townsend to drop his cases and “never have an honest day in court” or “contact with his children” or “have relief from the arbitrariness” as a result of the Gray ET AL conspiracy as confirmed by judge Gomez in 2004 and 2006 or never see his kids which would also discredit the “false public light” claims by using false Aisenberg type claims by Deputies ETAL and even false reports and defenses of Attorney Denny to Crenshaw to destroy this member by claiming “abuse” and “dangerous with guns” by the father on the kids as the Jeffers/Beck Gang started 09/08/1999.

Even the filing in 8/2009 of Grays Motion To Dismiss was after Gray tendered 7/09, her Consent to stop her practice of law and thereby as a Pro Se could not file answers or papers with the courts as a legal

answer for her attorney firm or her co-participants. This arrogant defiance to the Rules of Civil Procedure and Laws shows additional proofs of the conspiracy now including judge Cook and the Gray Co-participants Gray was to expose and litigate since March 14, 2003.

Thus due to the continuing delays and illegal acts of The Florida Bar/judges/State Attorneys/Governors ET AL conspiring to not allow Townsend or Townsend ET AL to have relief from ongoing deprivations by an “Honest Day In Court since about 1988” or “an Honest Day in our Church Meetings” since the 1/1995, Business Meeting “partial” disclosure of the “frauds” of the “Sect” to expose and stop the illegal acts of these Co-participants, these Appellants come now again with this detailed Brief to give no more wiggle room to Co-conspirators and this Court as Appellants for: relief; restitution; and prosecutions; state:

PER: R.O.C.P. 1.530(e) Actions tried without jury;

1.540(b) CAUSE OF ACTION(s) BASED ON:

FRAUDS AND FRADULENT PRACTICES;

FRAUDULENT PRACTICES UNDER COLOR OF

LAW:

RICO AND ANTI-TRUST LAWS AND

ONGOING CHILD INTERFERENCE LAWS IN

VIOLATION OF COURT ORDERS,

CONSTITUTIONAL RIGHTS AND FBCCP

CONTRACT RIGHTS.

PLAINTIFFS MOTION FOR ORDER AND WRITS
ON PLAINTIFFS

MOTION FOR REHEARING AND RECONSIDERATION.

THE QUESTIONS PRESENTED FOR REVIEW

Facilitation, Frauds, False Oaths, Felonies, Forgery, Forcible Entry, False Imprisonment, False Pretense, by Forcible Detainers Forbears our “Free Exercise Clause” Freedom Rights by Fiduciaries on Appellants . “Ficinus Quos Inquinat AeQuat—villainy and guilt make all those whom it contaminates equal in character.” “Fiat Justica--let justice be done”.

This Florida Supreme Court again has done a “false return” and failed to prosecute per their contract with citizens the issues or the facilitators but entered an Order, disbaring Attorney Heather Mary Ann Gray (Gray) from the practice of law based on knowing the “RISK” of “a small lie always if not stopped gets bigger” and now based on Gray’s conspired Consent Judgement Gray signed 12/10/2009, admitted and telling the Court:

“8. In light of these proceedings and her mental health issues, Respondent has ceased the active practice of law. In July 2009, voluntarily elected to be placed on inactive membership status with the Florida Bar.”

This statement of Gray ET AL is another scheme of her Criminal Enterprise Co-Participants and a knowingly and intentionally “not true uttered false report” based on Gray’s continuing her illegally deceptive litigation practices for herself and her agency and “others” up to and from August 2009 to current status and conspired participation with newly added defendant judge Cook ET. AL. co-participants to continue **Aisenberg Rule**

(government persons intentionally uttered false reports while blocking the Respondents rights to Discovery, Witnesses as even his own children and By-Laws Protected Church members, a Fair Jury Trial, while making threats in 2010 for Townsend not to report felonies as in this lawsuit) deprivations, threats and extortion, false detainment, interference with child custody, interference with Contract Rights; Church Contract Duties and Rights; intentional frauds and felony attacks against Townsend and victim Plaintiffs for whom Townsend speaks as an attempt to conceal all criminal acts of co-participants with Gray who Gray initially is intentionally used and intentionally trained to knowingly still conceal Plaintiffs causes against Defendants and “Others”. If this father can report such “Felony” violations of law and “harassment’s” by the Jeffers ET AL “Sect” as CPCS School Principal Herman Meister made the statement in February 2002, “We made a pack to deny and destroy everything you say” (as part of the Sham since 1995)—how much more can the kids report has happened to them as these “Jeffers/Dr. & Mrs. Lynn/Meister/Beck/Karen Harrod Sect” controlled their school grades, attendance records, medical reports, College Loans, Child Support and by frauds to church members and Attorney Popper ET AL. conspiracy with BAR ET AL. every waking moment of these kids sanity since they were “mentally” abducted since ages 11 & 13 and physically at 14

& 16. The kids and father as in the Elizabeth Smart case has recovery rights.

The Internet and web sites like www.Judgeoneyourself.com give citizens our Constitutional rights and ability to expose what this FSCt., and “Agents” thereof as Elected and Appointed Officers, Lawyers and Judges and what co-participants who deceptively control the judges, T.V. media, newspapers and Clerks of Courts refuse to let be part of “public” knowledge as would be exposed in a “due process” Trial against Townsend not afforded since 1988, his demanded Jury Trial yet conspirators abduct his kids, Rights, money and “true public light” reputation of this Respondent protecting himself and others from Criminal Enterprises of these unlawful participants.

If this court says Gray suffers from “mental health issues” from these facts then the court and co-participants must admit their “infliction of emotional distress” and deprivations her deeds and those intentional “risky” deeds of her co-participants do to these victims for whom this Brief speaks.

Also if this Court recognizes this “mental health issue” as a fact then this Court shows the mother Karen Harrod Townsend was “unfit for any custody” of J.G.T and J.D.T. as Randall Townsend and multiple Doctors admit since 1999 as a result of the fraudulent defamation scheme of “Aisenberg type Popper/Chapin/Crist/Jeffers/Scruggs/Gray/Bar Members ET AL.” now proved doing the same acts as kidnapper John Couey and

investment sham Bernie Madoff to their victims.

FACT-Gray nor Scruggs never asked for nor produced nor filed with any court the papers per Family Law 12.040 ATTORNEYS (a) Limited Appearance; but accepted to litigate exposing the Popper/Chapin/Bush/Crist-Jeffers ET AL Criminal Enterprise involving the Florida Bar Officers and this Supreme Court the deprivations of their scheme and the “mental health issues”, frauds, illegal acts and incompetence of the mother (cases 01-15814, 02-4974, 05-9606, 02-03812) conspiring with and for the “Beck ET AL clergy” (cases 01-15813, 02-03812) and all now enjoined herein and with the maternal Grand-mother (Norma) as the Karen birth certificate shows has Dementia and the “bullying” tactics of FBCCP/CPCS Employees and “others” to the kids and Members. This Dementia- ”deterioration of intellectual facilities with concomitant emotional disturbance resulting from organic brain disorder” cause this father even more concern and the need to see that his children J.G.T. and J.D.T, are not further harmed as was reported to these conspirators before even the “8/2000 Certified Letter” to Dr. Lynn. Co-participants knew and admit the “risk” and “results” of the felony abuses “under color of law” since 1988, on Randall Townsend by Attorney Popper (with Chapin/Bar) ET AL and resulting on Townsend ET Al. still trying to have an “honest day in a Florida jury court” since Popper did his first acts

of malpractice in 1988 and these same defendants still trying to continue concealing these deprivations from this malpractice still deprive Plaintiffs.

Biased Governor Charlie Crist and as Attorney General of Florida has had the “power of detainment and deprivations” on the checks and balances for “equal and due process” in this case and the Townsend v. Popper/Chapin ET AL cases and he has admitted using “superior knowledge and powers” for his personal self dealing and agenda. Also Crist ET AL and as Chapin ET AL has for “personal self dealing” has had the personal motives to conspire and unite to destroy and defame Townsend during the litigation of these Rights through and up to the litigations in the United States Supreme Court.

With the 1999-2001, Florida Supreme Court (FSCt.) knowingly being directly tainted against Townsend or anything he legally states by their Supreme Court mediator Chapin, A.G. Crist, Gov. Bush, the FSCt. and their “Bar agents ET AL”, Harkness and Berry (February 1992, American Bar Association’s McKay Commission report entitled *Lawyer Regulation for A New Century: Report of the Commission on Evaluation of Disciplinary Enforcement* admitting the process involving Harkness and Berry ET AL is subject to prejudice and renders it suspect and Mr. Root’s confessions Reporting illegal participation admitting directly as per Recommendation #3 (lawyer discipline must protect the public and not lawyers collectively or

individually) per the actions of: concealing the admitted conspiracy of the Florida Bar Investigations of Chapin, Popper and Williams (93-31, 690 and 691 and 692) and victims of Heather Gray and her co-participants as reported in Complaint 05-3977, as Tampa Bar Agent Jane Cristy ET AL signed on 11/21/05 for the Complaint received Certified Mail and in 1/2006, Secretary ELAINE ADVISED MS. LIEMAN “threw the complaint in the trash; and A.G. Crist to conspire to conceal and rule P.C.A. decisions in the Lane, Chapin, Popper and Williams related cases the FSCT. Judges not being protected by not taking their oaths of office are also prejudiced and equal co-participants to and including the continuing of the deprivations and defaming any truth in fact and law Townsend has advocated for himself and for those of FBCCP and citizens for whom he was elected to speak.

The Florida Bar Verified Complaint 05-3977, was also received by Certified Mail to the Judicial Qualifications Commission and Governor Bush who both for self dealings violated their Fiduciary Duty to per their “oaths” and “contracts” involve themselves with doing justice in these matters.

When the FBCCP members including the “Jeffers sect” fired the “Clergy” (“Nasworthy/Beck/Meister/Brown”) and “others” but concealed themselves based on “Townsend Church Supreme Court By-Laws Truths” this reveals non-member Government Jeffers ET AL./Scruggs/Gray ET AL.

conspiracy to use and conceal Deputy Jeffers ET AL ongoing criminal acts and Church By-Law violations to “impede” a Church Rights Investigation and Constitutional and Church By-Laws Rights violations against FBCCP members and as citizens as Townsend has advocated since elected in 1993.

The Fifth DCA, Second DCA and Florida Bar findings against Gray and as approved by this FSCt. and being as acts of Chapin now confirm the lack of rulings favoring Townsend against the illegal conspiring and torts of Popper/Chapin ET AL., and Williams and the P.C.A. ruling was part of the “Criminal Enterprise” still to defame and deprive Townsend as reported on TV-13 to candidate Jeb Bush since 1998 and to attorney David Gibbs since the early 1990’s and to Attorney Charles Scruggs (former Judge) since July 2000 and then to Gray in 2003 who knowingly and intentionally violated their Oaths and lawful and contract duties to continue the Chapin ET AL Criminal Enterprise to destroy Townsend and anything Truth he speaks.

Co-conspirators still ignore the “Couey like” abduction scolding they got from judge Palomino on 11/15/2001, to Scruggs/Harrod/Beck/Jeffers ET AL to not do the Federal Criminal Charge of “Parental ET AL Kidnapping” as all interfere from 10/21/99, still ongoing as confirmed by threats of HCSO Detective John McDarby 3/31/2010 and by judge Cook with custody or contact by Townsend with his children when co-participants were proved

illegally conspiring to utter false reports by “under oath” affidavits and court testimony to maliciously use false testimony and “process” to conceal their felonies and deprive the truths Townsend has now proved. Scruggs nor Gray never took testimony from the kids or “Doctors”(or letters) to deny or verify the illegal charges of Beck/Jeffers ET AL co-participants as they knew the charges against Townsend is an ongoing Aisenberg falsehood tactic to put Townsend in a “false public light”. Co-participants even ignore the “contact with children rights” of the 2003 Divorce Judgement with Injunctions of Timmerman and in 2010 still violate the civil rights of Plaintiffs and threaten vindicated Townsend to not file these legal papers and do not have any contact or per judge Cook even to represent his children as a Pro Se Respondent in courts or church as per his F.S.§617, Church By-Laws Contract 1993 Elected “Duty” as elected prior to Deputy Tim Jeffers or Jeffers ET AL. gaining any “self dealing” right to “impede” Townsend in his FBCCP Supreme Court Duty per the By-Laws and proved by the 2006 Partial Production per Crenshaw, still a Member being illegally detained and trespassed by Pinellas Deputy Jeffers Et Al. with no legal authority in Hillsborough County except for his conspiring with “others” from 1/95.

Attorney Denny ET AL. from 1/2003, knowing the “Risk” in KOND id. also knowingly concealed his “sect” acts knowing that the “sect”

was actively continuing and doing additional frauds to his admitted clients of FBCCP and illegally using and defaming the FBCCP Corporation as a “Not for Profit”. Registered Agent Lawyer Grant from 9/99, again is advised of illegal acts of the “sect” and refuses to follow the Law and By-Laws as Townsend demanded which results in the greater deprivations of Plaintiffs.

Attorney Gray, Scruggs, Grant, Gibbs, Gardner, Stanford Solomon and “others” (even Popper and Chapin knowing the risks of preventing Townsend from working, contacting his customers and paying family bills) were to litigate for this father these issues of the deprived mental state of the mother, Karen and her maternal mother Norma and her father Don even the more in March 2004, when the “acts” of rage were done at the court of Judge Gomez and showing the trauma of the children daily in their Harrod unsafe environment. Facts confirm Chapin ET AL goals to ruin Townsend.

This FSCt. Ruling “partially” against Gray and ignoring the rights of the victims she was to represent even to this Court shows each co-participant has been or is still being rewarded by Quid Pro Quo for their conspired actions depriving Townsend and the resulting relationship deprivations separating him from his children since 1999 used as a false report to distract from Townsend’s connected legal claims calling in “9-11 felonies” made since 1988 to Popper ET AL and actively contested still in August 2001 as:

“IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA
CASE NO. CI97-8519
DIVISION: 40

RANDALL TOWNSEND,
Plaintiff,

vs.

BRUCE E. CHAPIN, et. al,
Defendents(s).

REPLY TO NOTICE OF INTENT TO DISMISS

To: The Honorable Circuit Judge Ted Coleman, Orange County Courthouse 425 N.
Orange Ave, Orlando, Fl 32801
O’Neill & Chapin 200 E. Robinson St Suite 865 Orlando, Fl 32801
David H. Popper, Esquire Post Office Box 540199 Orlando, Fl 32858-0199

1. Per R.O.C.P 1.54, Fraud prohibits an action from being dismissed.
2. In the matter Townsend v. Lane, these Defendants were charged with representing the rights of Plaintiff. In the 1988-1989 hearings Judge Muszynski made rulings for discovery and a receivership which these Defendants using their disguise as Attorney’s working in the best interest for this Plaintiff instead used their conspiracy powers to destroy and fraud the case of their own client before other Judges in these courts.
3. Plaintiff respectfully requests these matters be reviewed in detail by this Honorable Judge and Court and review the questions presented to the United States Supreme Court as presented as attached herein as Exhibit “A”.
4. Said question of law and of facts must be allowed to be adequately allowed the Discovery Process and then be reviewed by a jury trial before this Honorable Court could attempt to say this matter has been fairly understood and thus able to be settled.
5. Until this court allows Discovery the full conspiracy of these Defendants is not able to be fully revealed and thus not able to be tried in a Court of Law. This prevents justice and puts the court involved in the tampering with justice and violation of my Constitutional Rights and Contract Rights..

Respectfully Submitted,
Randall Townsend
P.O. Box 21
Odessa, Fl 33556
813 920-9633 Phone
813 920-6996 Fax”

Per the ruling of the 11th Federal Circuit Court of Appeals and the timing of the continuing “criminal enterprise” in 08/2001, to now by co-participants to conceal the felonies Townsend was reporting since 1987, gives Pellegrini id. conspirators an unjust motive and criminal false report opportunity to allege Beck/Jeffers ET AL defamation against Townsend as “dangerous with guns”, “suffering a mental breakdown”, “abuser”, “a liar” etc. as by years of litigation all proved part of false reports of the criminal enterprise started by Popper/Chapin ET AL. with the conspiring Orange County Chief judge Rom Powell ET AL. and as reported in 06/1999 again to Jeb Bush, A.G. Crist/Bar ET AL. and by various other contacts and letters at many times and directly known by at the time in 1997 of the FBCCP Eminent Domain Settlement Conference by Hillsborough County Attorney Pat Bean. Thus the fraud to conceal the acts of Chapin ET AL directly by the Florida Bar (Harkness/Berry) shows a direct connection to the warnings of illegal conduct in the McKay Commission Report written in part by Florida Bar John T. Berry, himself with Tim Chinaris as per the Florida Bar Journal directly with John T. Berry as the “Professional Ethics/Board Review” Staff.

Further, the direct threat of Florida Bar Tim Chinaris and Tony Boggs made to Townsend in the Florida Bar Tallahassee office 6/1999, “If you ever

get your law degree within 6 months I will find a way to have you disbarred” became real as part of the master plan of RICO and Civil Rights violations of the co-participants criminal enterprise per their McKay Report.

As a result of being served Divorce Papers (4/2002) by Karen Harrod Townsend as a “scheme” of her and her co-defendants criminal enterprise Respondent Townsend timely filed his answer case 02-03812 in defiance to the now proved illegal counseling of Scruggs/Bar ET AL and timely served Beck, Jeffers and “others” as within the lawful precedence of **MT. OLIVE PRIMITIVE BAPTIST ET AL v. HARRIS ET AL.** 860 So2d 520 (Fla. App 1 Dist. 2003) allows Plaintiff’s rights by stating:

“RELIGIOUS SOCIETIES §31(4) Church representatives’ complaint against church and its pastor, asserted by representatives as individuals on derivative basis on behalf of church, set forth sufficient allegations of ultimate fact to withstand motion to dismiss for failure to state a cause of action,...

as within the discretion of judge Arnold: to allow 02-03812 to go forward; order as Respondent Townsend demanded per Count EIGHT (Injunctive Relief of “Discovery all Documents...being hid by Defendants” and “immediately direct all Defendants to stop retaliations against Plaintiffs family” creating as Claimed in COUNT ONE: Intentional infliction of emotional distress and to learn who is acting as willful criminal conspirators of the “sect” by F.S. §617.0834(1)(b)1., since Townsend is being “defamed”

and “impeded” by Jeffers/Beck/Karen Harrod Townsend ET AL per **RELIGIOUS SOCIETIES §71:3** as the Production 6/6/2006 of the Business Meeting Minutes of 4/30/2000, showed that the “Notice and Hearing” was done illegally as Deputies Jeffers, Howlett, Smoak, Corbin, and Shumate Coast Guard stood on Church steps and as other times used their Uniform and Law Enforcement vehicles to chase Townsend from the Meetings since 9/8/1999, and called HCSO 10/28/27, to Trespass Townsend from his kids and all Church/School Properties and Functions even in multiple (9+) Florida counties; and “protect his children” and church members and citizens as the Crenshaw counts demanded and acknowledged by Arnold 1/2003 through again in 2006 and Barbas as sufficient, 4/5/2007. The 02-03812, Third Amended Supplemental Complaint To Conform to Evidence and Demand for Jury Trial as timely filed by 8/10/06, per the Order of judge Crenshaw in part written by her on 5/10/06, clearly met the burden to withstand against a dismissal as Barber did and illegally backdated his Order as a further attempt to “impede” Plaintiffs. Cook even dismisses the Malicious Prosecution Count Crenshaw (now on the 2DCA as Cooks superior) wrote 5/10/06, admitting and exposing Gray ET AL.

From January 2003 until 2006, Denny ET AL. intentionally and knowingly used the District Court ruling for Doe v. Malicki 771 So.2d 545

(Fla. App. 3 Dist 2000) even after being advised this Supreme Court in 814 So.2d 347 (March 14, 2002 Fla. Sct.) had over turned said 771 case and the related cases which adversely affected the positions benefiting Denny ET AL who was never speaking for the Non Sect Members as they proved by Firing Beck, Meister and “others” when Townsend exposed their criminal acts on his web site. Judge Crenshaw appointed by Bush, knew the frauds.

Additionally, Denny used KOND 769 So.2d 1073 which benefited the frauds of the Deputies ET AL “sect” verses the non sect victim members for whom Townsend was elected for and still speaks per his By-Laws DUTY.

The “non members and illegal Deputies” are still able to prohibit the By-Laws actions of Townsend as their Superior Supreme Court adjudicator of the sects ethics per the By-Laws and therefore “impeded” the Civil Rights and Contract Rights to Townsend and those for whom he speaks. Thus government sect gained “arbitrariness”, ownership, “unequal and undue process” which the By-Laws prohibits these Jeffers Deputies ET AL. acting in their Government Officers positions and or to conceal for themselves their own self dealings depriving the membership of their Rights and Property and Townsend illegally detained from his kids, rights and Church authority now since the 9/08/99 FBCCP Demand Meeting began per the 1/95, meetings.

At no time since about 09/08/1999, as a cover for the Jeffers violation

of: the FBCCP By-laws; embezzlement and frauds of Church Funds and other felonies done “under color of law” has: the mother Karen “Harrod” Townsend and FBCCP/CPCS employee; “Deputy” Tim Jeffers and wife CPCS Principal Karen Jeffers; CPCS “pastor” Herman Meister; Gary Leatherman; Paula Powell; HCSO Detective Mike Smoak; Dr. Lon and wife Gayle Lynn; as “clergy” Ron Beck ET AL., “law enforcers” and HCSO Gary Terry and “others” all as co-participants had the right to “impede” this father from the care and contact with his children and FBCCP Members but facts show HCSO Gary Terry, his HCSO Detective Mike Smoak for Deputy Tim Jeffers ET AL. intentionally since 1999, prohibit this father from his children still in 2010 by “Darby others” as HCSO Terry has retired but the conspirators do deprivations per orders of Jeffers/Grant/Gee/Ober ET AL.

And “others” still “impede” this father as a citizen, Respondent to Proved Falsely Alleged Felony Charges (11/2001 as 01-15813 and 01-15814) and Church Supreme Court Investigator from the production of all Church Business Reports and financial matters of their “sect” self dealings.

Several Finance Committee Members and “experts” confirmed illegal criminal acts of the Church sect since 1995 per the Under Color Of Law and illegal legal directives of Deputy Tim Jeffers and “Sect” Tim Jeffers ET AL.

“Alleged” law enforcers for “unreported self dealing” still refuse since

1995 to obey the Church members per the By-Laws, Civil, Criminal Laws and Contract duty to assist Church members free themselves of deprivations of their Contract Rights by the “Jeffers sect” violation of By-Laws or Constitutional Rights Under Color of Law but instead are acts in their RICO Criminal Enterprise Schemes against Citizens for whom Townsend speaks.

These co-participants intentionally exacerbated and escalated the proved “demented” mental state and crimes of Karen “Harrod” Townsend falsely blaming Randall Townsend as a tool of their criminal enterprise to further damage the “public image” of Townsend to devalue the Truths he reported about violations by Public Officers per Florida Statues §112.3173, since about 1988 and §112.533 Complaints about “law enforcers” Deputies, State Attorney Agents, FDLE, the Bar, as now fully confirmed. The 12/05 Affidavit of Karen “Harrod” Townsend to judge Holder reversing the Harrod/Beck/Jeffers/Howlett/HCSO/Ober Agents/ Denny/Scruggs/Bar Et AL. previous false perjurious 10/2001 Affidavits and the 2006 Partial Production of FBCCP Financial Records confirming the illegal motives of “Harrods”/Beck/Jeffers/Howlett/Smoak/Grant/Gibbs/HCSO/Ober ET AL. and “others” as the co-participants still continue their illegal depriving and extortion to Townsend, his children and citizens by direct threats made still in 2010, to this victim and protected “Whistle Blower”.

Each Clerk of Court has had a duty per §112.3173(4)(a) to report Townsend filed Complaints to the Commission on Ethics but rather Clerks, The Florida Bar, Judicial Qualifications Commission, Governors and others have illegally refused process and caused “unequal due process” and delays. Co-participants therefore have had motives to defame Townsend verses the “Law Enforcers” or “Elected Officers” by extortion, destroying and deprivation using the wife and kids as tools for their criminal enterprise. The political structure of the Commission on Ethics is questionable to the issue of bias and prejudice as the participants in the Bush-McKay-Chapin-Crist-McCollum elections have had direct and personal interest in promoting their candidate and not wanting any exposure of criminal wrong doings.

Co-participants have even directly stated in the Sheriff David Gee HCSO investigation of Sarasota Police Chief Abbott that the same acts Abbott and his officers used were illegal by “law enforcers” yet these same acts and threats and bribes being done to Townsend ET AL by “law enforcers” are still practiced as part of Chapin/Crist/Jeffers/Gee/Ober/judges ET AL “scheme” to stop Townsend reporting and litigating their violations.

Co-participants have illegally hid their deprivations and illegal acts for many years behind “uttering false reports of and as benefits of the “alleged” “clergy” rather than follow F.S. §111.065-111.07 and further put

the payment of fraudulent litigation costs on the naïve membership to whom Deputy Jeffers/Howlett/Smoak/Corbin ET AL continue their illegal “Under of Color of Law acts. With the: Affidavit of 12/2005, by Karen Harrod Townsend to judge Holder and filed with judge Crenshaw admitting her frauds to the church members and the courts in her affidavits and testimony to judge Palomino (01-15814) and Timmerman (02-4974) fraudulently used by Jeffers/Denny ET AL., including “sect agents”; the production of FBCCP records partially produced showing the “fraud, collusion or arbitrariness on the part of the church authorities having jurisdiction of the controversy” and subsequent termination in 2008 of the “alleged pastors” and “others” by the membership the illegal acts continues and now can only be pointed to the “Jeffers ET AL government violators” plots of criminal enterprise as now admitted by Former Senator Church Registered Agent Grant in 2010.

The February 2006 court transcripts of Scruggs confessions of the “sham” and malpractice to judge Stoddard and his “hate” letter to Townsend show his failure of duty and conspiracy with your disbarred attorney Heather Gray as confirmed by the 11th Circuit Court of Appeals and the 2006 Crenshaw ruling illegally trying to “conspire/broker a summary judgement” and limit exposure of the government conspiracy of these Co-Participants who appointed her to contain the case and then Quid Pro Quo rewarded her

to the 2DCA. Also note the lack of “judge rotation” of 02-03812 as proof.

For this Florida Supreme Court to fulfill its duty to the Citizens this court must: 1. let the victims of Gray as Townsend and Townsend ET AL. have their “equal and due process” honest “day to the Grand Jury” and “day in courts” and which includes full and complete “discovery” to connect all related facts of co-participants schemes to “harass”, “bully” and “extort” victims of Gray and Gray ET AL.; 2. Prosecute to the fullest extent of the law those who instigated and participated in these egregious criminal felonies; 3. Create proper use of Tax-payers funds by “law enforcers” and not allow the “self dealing” bribes and “pensions” to these criminals; 4. Restore victims to their positions before and at the time of these “felonies” And 5. compensate us as our laws state; 6. Break up the RICO BAR Gang.

Without this, the Florida Bar leaders, FSCt. and the Co-participants still appear to intentionally with malice conspire to not present or litigate or adjudicate justice per their full Fiduciary Contract, Constitutional Obligation per the law and contract rights of victims of Heather Gray and Gray ET AL.

BASED ON THESE KNOWN criminal plots as “Scams against citizens” as judge Marva Crenshaw connected in 2006 saying “All things are related” and “take the money in this Summary Judgement and then you can go after all the others” that have created the basis of

intentional acts that escalated to causing Townsend now to not be a father to my kids abducted at ages 16 & 14 in 1999, and unhindered by these criminals conspiracy since October 21, 1999 and before as follows:

PLOT ONE—By Orlando Attorney Bruce Chapin and Attorney David Popper with Chief Judge Rom Powell for the sake of concealing intentional malpractice of Popper and also other clients complaints against Chapins as Linda Chapin was being vetted to run for LT. Governor with Buddy McKay against Jeb Bush. The “Abbot” goal –never let anything Townsend say put Townsend in any truthful “public light” or it blows the entire lid on Popper concealing Townsend reporting the felonies since 1987 that Popper Et Al criminally conceals!

PLOT TWO—By the Florida Bar to conceal the “Root” Bar investigations Townsend and others reported against these attorneys Popper, Chapin and Williams. Florida Bar Executives John Harkness and John T. Berry directly let these cases be sabotaged just to conceal the Chapins in her run for political offices after she served as the Chairwoman of the Orlando County Commission. The Florida Bar Tampa Office then “throws in the trash” the #05-3977, 2005 updated Complaints. Then the Florida Bar clearly again repeats ignoring the Complaints of Townsend and files to have Townsend’s Attorney

Heather Gray disbarred for the same patterns of actions Townsend exposed in 2003, yet the Bar and the Florida Supreme Court will not allow the charges against Gray to be connected to her plot for them against Townsend Et AL. Many lawyers know the patterns and threats are “REAL” and are documented in many cases since the 1990’s.

PLOT THREE—By Charlie Crist as Attorney General and Jeb Bush (Since the Tampa Channel 13 Town Hall Meeting) and as Governor and to A.G. Bill McCollum to use the information Townsend provided them about the Frauds and crimes of Chapins and the Florida Bar ET AL as their leverage to control their powers and even the SC09-1910 ORDER FOR STATEWIDE GRAND JURY #19, process.

PLOT FOUR—By Hillsborough County attorney at the time Pat Bean in controlling the Eminent Domain settlements to expand Gunn Highway to build Sickles High school the FBCCP was over paid a settlement that was a fraud to the citizens and to Church Members as confirmed by Townsend and experts by a “sham” of these “Jeffers/Beck Sect” with Commissioner Jim Norman, Senator John Grant and Pat Bean and lawyers working unethically with “sect clergy/deputies” who “sham to scam” for their own self dealings!

PLOT FIVE—By the now Ex Wife Karen Harrod

Townsend and her maternal “Harrod ET AL” family to control and dominate and fraud any person they can at all possible times!

PLOT SIX—By Hillsborough County Sheriff David Gee, Gary Terry (Aisenberg Plan Leader) and Pinellas County Sheriff Bill Coats in collusion with State Attorney Mark Ober and Charlie Crist and Bill McCollum and County Administrator (now terminated) Pat Bean and Board of County Commissioners and Judges and attorneys David Gibbs, John Grant, Charles Scruggs, Heather Gray (now you disbarred), Charles Denny IV, Stacey Turmel, and each named judge and “court officer” and “others” who still conspire as revealed through judge Cook in 2009, to never let Randall Townsend have a “day” in an “Honest Courtroom judged by a jury” nor in “his Church of his youth” with “preyed” upon Honest Citizens as the “Church Jury”.

These PLOTS are clearly and easily defined where even the every day voters scream “ODIOUS AND OUTRAGEOUS” as judge Crenshaw said had to be proved before she illegally bailed and 5th on the case and then is QUID PRO QUO rewarded by Crist to the 2 DCA!

Even Federal Judge Moody Jr. on 03/15/2007, believed these Confirmed facts and said to Townsend to “amend the brief and be detailed”!

The “Causes” Gray ET AL and Scruggs ET AL was “Retained and

Paid” to expose “without any limited appearance”, in part are as follows:

1. Stop the ongoing abduction and extortion of the Townsend children (J.G.T and J.D.T. ages 14 & 16 respectively) since 10/20/1999, from their father and unlawful interference with custody since 09/08/1999 (Church Demand Meeting: Show me the money trail and Stop the Building Scheme Frauds), by the willful, knowledgeable mother Karen Harrod Townsend and her co-participants against this father and his kids. The abduction and threats by all co-participants for Randall Townsend to not have any contact with the children is still made and enforced in 2010 by Jeffers/HCSO ET AL. as extortion still by co-participants to threaten Townsend to abort his reporting felonies by “law enforcers” since about 1987. Likewise the children since 09/08/1999 and before have been threatened by Jeffers to not have contact with their father and fellow church member/leader based on frauds and threats by co-participants.
2. Report the criminal acts of all co-participants to “honorable” “law enforcers” and courts and restore the reputation of Randall Townsend so he could maintain a “non false public light” and have a restored and Constitutionally protected relationship with his kids, Church family, Employers, clients and community.
3. Reporting includes detailing the “unclean hands” and criminal acts of:

- A. The Conspiracy and intentional frauds of Attorney Charles H. Scruggs, III and Judge Wayne Timmerman and Attorney Stacey Turmel and “others Doe” by Gray that after Scruggs was fired on 9/30/03, they still conspired to destroy Randall Townsend via multiple “Drafts” resulting in the illegal Divorce Judgement and Injunction of 2003, (even though both kids were over 18 since 08/2003) still being used in 2010 by co-participants to obstruct Townsend in a “false public light” from his kids, church, church duties and community;
- B. Karen Harrod Townsend the mother and her maternal family “Harrod”, as: confirmed by multiple Doctors acts of child abuse; child endangerment(s), “rage”, illegally using pharmaceuticals, batteries; Karen using a firearm against Randall; theft; interference with child custody; uttering false reports to FBCCP, IRS reports, reports and false affidavits to law enforcement and courts; proved as perjuries;
- C. The Church “Sect” to conceal their self dealings and felonies, under color of law uttering false reports since about 1/1995, to the FBCCP Members (the true owners of the FBCCP/CPCS Corporation per the By-Laws) and to law enforcers and the courts to conceal intentional and ongoing violations against plaintiffs;
- D. The Church “Sect Agents” as Co-participants fraudulently under color

of law concealing the “Deputies Jeffers ET AL government officers” and “others” felonies against anyone who does not allow member Townsend to be in an honest and “true public light” or all co-participants frauds since about 1988, unravel;

E. The Florida Bar Officers (Harkness and Berry ET AL.) and Judges and State and Local “Law Enforcement Officers” and elected Officials who had begun in and since 1988 with Attorney David H. Popper and Attorney Bruce Chapin ET AL., ignoring Felonies their client Townsend reported and continues to report as facts show the ongoing conspiracy by Popper and Chapin ET AL is still impeding Townsend for appellants rights. Emphasis added. Townsend never has had an honest day in any court since in 1987 seeking a Declaratory Judgement to separate all business dealings from a business partner when said business partner was observed in a felony. Attorney Popper failed timely to get Subpoenas regarding the “Sabal Brokerage Agreement” joint venture business relationship and as a result Townsend suffered severe deprivations as Popper conspired with Chapin ET AL to conceal their torts. And now Townsend and Townsend ET AL is still being deprived of our Contract and Constitutional Rights as the Popper/Chapin ET AL conspirators

still conceal resulting “Risks” of detainment and consequences.

Governors Bush and Crist and Senator John Grant (Grant also as the FBCCP Registered Agent), co-participants and attorneys and “law enforcers” have known sufficient issues of these illegal felony acts and have knowingly, willingly and intentionally assisted in these felony deprivations blocking “fiduciary obligations” and Constitutional Due and Equal Process per Contract Rights. Chapin rather than let Townsend v. Lane go to trial had to conceal the felonies of Popper and Lane. Chapin also as settlement said he would see that Townsend was paid recovery of his lost years of work by Chapin's son hiring Townsend as a consultant to find restaurant locations. It now is known Chapin through his son Patrick was able to with Crist and Bush and Ober, control DCF and Sheriff investigations of Townsend claims regarding “impeding” and deprivations of rights with his children.

For this Supreme Court to allow a Gray Consent Judgement and then also allow the lower courts and co-participants (State Agencies, individuals and “others”) to continue in their criminal conspiracy to assist and ignore the intentional neglect of contractual fiduciary duties and all felonies and Child Interference issues Gray was to litigate makes this Supreme Court again an intentional accomplice to multiple past and ongoing breach of fiduciary duties and felonies started by frauds of attorney David Popper ET AL. and

facilitated by the intentional conspiracy of the Florida Bar and Co-participants since 1988.

Not only did this Supreme Court fail to adjudicate the law based on the past felonies of Gray, this court also is ignoring her still ongoing participation doing the violations of her own past criminal acts against this father and his kids, members and citizens with the co-participants still in unlawful detainment requiring this Writ of Habeas Corpus.

For the December 22, 2009, Report of the Referee by the Florida Bar to this Supreme Court to ignore:

- 1. FLORIDA BAR COMPLAINT(s)- 05-3977; 93-31, 690 and 691 and 692;**
- 2. Townsend filed Appeals to the 2nd, 5th DCA and this court; shows a willful intent to deceive the Honor of the Florida Supreme Court and citizens per their Fiduciary Duty per the Florida Constitution and Rules of Court.**

Thus again proving Mr. John Harkness and Mr. John Berry ET AL. as “R.I.C.O. Roosters guarding the hen house” are RICO “Sect Agents” as the FBCCP members in 1997 claimed the Jeffers Finance Committee Members were illegal “Roosters Guarding the Hen House” violating their By-Laws and State Duties and have violated their Fiduciary Duty to provide “honest

services” to these Appellants and to the public and as well to the members of the Bar by distorting the “chain of evidence” to protect their own breach of contracts and illegal acts and violate the public as their Recommendation #3 of **The 1992 ABA McKAY COMMISSION REPORT** holds as their duty.

These Appellants for whom Townsend speaks, are “Gooder than the Good Ole Boys” seeking “pure as the driven snow” Religious Rights and Constitutional Rights yet these Co-participants cannot handle nor report nor stop their own failures of By-law standards these Townsend Appellants seek.

Church “non sect” Townsend Appellants have proved since their 1/1995 “revolt” at the Nasworthy confession their “duty” by the law to show that their contract rights have been “impeded” by the “sect” and “Sect Agents” of Jeffers ET AL. in violation of:

“FIRST FREE WILL BAP. CH. OF BLOUNTSTOWN, INC, v. FRANKLIN, ET AL. 4 So2d 390, 148 Fla. 277:

The law appears to be settled that in the absence of a showing of fraud, collusion or arbitrariness on the part of the church authorities having jurisdiction of the controversy, the courts will not interfere.”

These Appellants as Citizens demand due process and allow “redress from government” to maintain our Constitutional Rights having proved “frauds, collusion and arbitrariness” since the 1/1995 admissions of the Administrative Pastor Elbert Nasworthy in the FBCCP Business Meetings admitting fraudulent “self dealing” of Corporations Members “Designated”

Donations and Rights and by using evasive fraudulent terms Jeffers and Powell ET AL still use. Claiming “superior knowledge” “Under Color of Law” as a “deputy” the collusion was and is still being concealed by the same “deputy” Tim Jeffers ET AL. still “impeding” Townsend per his By-Laws Superior Authority prior to Jeffers Finance Committee Authority and or as a “deputy” using his “law enforcers” still conspiring to impede members rights and give “illegal self dealing” “unlawful” benefit to “alleged clergy” and co-participants. Per “SUIT v. GILBERT (1941) 148 Fla. 31, 3 So2d 729, The constitution and by-laws of an association govern the rights, duties and liabilities of the members and when subscribed or assented to by the members become a contract between each member and the association.”

The cases Denny and judge Crenshaw falsely used from 2003 to now as Malicki and Kond gives unlawful \$775.03 Benefit to Clergy/Deputies ET AL who have been proved since 1/1995 conspiring to “impede” the By-Laws Contract Rights of the Members for whom Townsend speaks and the FBCCP Corporation and by defaming Townsend serves the motives of all Co-Participants including this Florida Supreme Court who fails citizens.

The Hillsborough County and Pinellas County Sheriff Officers, Beck, Senator/Registered Agent Grant, Pat Bean, Gibbs, The Bar Agents and “others” have been in intentional collusion, as a “pack to deny and destroy

anything Townsend said” in church or in the courts and now has proved regarding the illegal “Sectarian acts” of Deputy Jeffers ET AL sect performing the criminal enterprise of the Popper/Chapin/Florida Bar/Law Enforcers ET AL. using our own FBCCP Corporation Funds, Tax Dollars, and Interest on Lawyer Trust Accounts (IOLTA Funds), COURT and Attorney Fees and costs and higher insurance contract costs and “other expenses” to conspire and deprive intentional frauds against Plaintiffs. The most “odious and outrageous” treason of this scam is the use of our own naïve kids to create “a false public light” and other frauds on naïve victims.

Florida Bar Mr. Harkness and Mr. Berry, Governor(s) Bush/Crist ET AL. maliciously and directly right down the “government” officers chain to unlawful Gibbs/Grant/Deputy Jeffers and Jeffers ET AL/Gray/Cook gang continue (even after firing the pastors and “others” knowing the frauds) to “impede” the FBCCP Contract “Supreme Court” Duties of Townsend to his FBCCP Members Townsend began in 1993 per his unanimous election by All FBCCP members/citizens. This “impeding” causes “Kolb” deprivations.

Members, and as Townsend and his children are still being detained and extorted intentionally in 2010 by Popper/Chapin ET Al conspirators.

Townsend retained Gray (03/14/2003) when saying “this \$1,000.00 retainer would more than cover her services” as defined by Townsend after a

lengthy discussion of all conspiracy issues at that time and as reported in the Florida Bar Complaints. Gray affirmed her position by affirming Attorney/former Hillsborough County Circuit Judge Charles Scruggs (Scruggs) affirmed all Townsend causes and facts since 1987 and was just needing Grays assistance with the magnitude of all the litigation pursuits.

Each government “law enforcer” is guilty of violations of duty per **Parrotino v. City of Jacksonville** 612 So2d 586, showing the duty of an officer who as in this case violated their duty to assist Townsend per his and “others” calls to “9-11 law enforcers” since 1988. “Law enforcement officer has duty to intercede on behalf of citizen whose constitutional rights are being violated in officer’s presence, and officer who does not intercede on behalf of citizen in such situation can be liable to that citizen under §1983. Jonelis v. Russo, D.Conn 1994, 863 F.Supp.84.) By allowing attorney Chapin and the political prejudice and powers of his wife, Orlando County Commission Chairwoman Linda Chapin to bias and fraud justice in the courts and “law enforcement” since their concealing the “Root” malpractice of attorney David Popper all justice and duty per the law has been violated.

Scruggs to support this client father and to emphasize his claim against Judge Timmerman and judge Timmerman ET AL. wrote the March 23, 2003, **Petitioner/Husband’s Verified Motion For Disqualification of**

Judge with no Family Law Rule 12.040(e) Notice of Limited Appearance Statement but with Certificate of Good Faith and stated that Divorce Judge Timmerman at the hearing in January 2003, “was incompetent and should have recused himself”. Timmerman is conspiring with his co-participants. Scruggs wrote “Honest” Townsend is “not competent to represent himself” and this is especially true as Bar Agents, Popper, Chapin, Gibbs, Grant, Scruggs, Gray and “others” were not acting nor lawfully per his “Superior Bar Status” advising Townsend per the true Rules of Law as now exposed.

Illegally 11 months later, fired Scruggs and Timmerman conspire multiple drafts to create the Divorce Injunctions against contact with the kids so this Father cannot advocate legal rights for his family, Church/School, or Member/citizens as per his F.S.617 Duty, contract rights and innocence. None of these multiple drafts nor the Final Judgement complied with Family Law Rule 12.040: (a); (b) (1) and (2); (c); (e); (f); as Townsend happened upon the multiple Scruggs/Turmel/Timmerman Divorce with Injunction(s) by obtaining at the last minute the files in the Clerks office.

Facts now show Scruggs intentionally Exparte tainted: “false” reporting; lack of full disclosure and representations to the courts in the 11/15/2001 (cases 01-15813 and 01-15814, before Judge Palomino); case 02-03812; case 02-4974; 05-9605; 05-0911; 06-6005 and at other times are

further proofs of his intentional failure to advocate the full and honest representation for his client(s) as Townsend and those for whom Townsend speaks as he conspired with and for Gray ET AL. and “other” of the Bar.

Scruggs himself wrote and confessed of his intentional malfeasance since July 2000, to Townsend on 09/30/2003 (and was immediately fired and as reported to Judge Timmerman 10/1/2003) and even to Judge Stoddard in a hearing 02/09/2006, admitting not providing “proper counsel” but still blamed Judge Timmerman for the **Divorce Injunction of December 2003** (Injunction) which is still being enforced by Gray and Gray ET AL. co-participants by multiple criminal acts including threats on 3/31/2010 by HCSO deputies ET AL. at the intentional directive of Former Senator John Grant (also at relevant times the Registered Agent of FBCCP and still conspiring as a “Good Ole Boy Republican” with HCSO Sheriff David Gee and State Attorney Mark Ober ET AL) and by unreasonable delays by the courts against innocent naïve abducted children and this father and those for whom he speaks. This “hate” letter of 2/16/2007, from Scruggs says:

“You poor crazy sick individual! I received your 40 page “Motion” and as usual, I can’t make anything out of it any better than the Judges, lawyers, public officials, pastors and church members that you’ve included in your Rambling Rubbish. I suggest that you get down on your knees and pray to our Heavenly Father that he take the heavy burden off your sholders and give you His peace. The plethora of goo which you spout has seperated you from reality. As the young

People would tell you “Get a life!” This litigation is consuming you (not to mention the forrest of trees you are destroying in your consumption of (coffee-strike) copy paper. Don’t you have anything meaningful going on in your life? It used to be God but in weeding through your written gibberish you write in you “legal” papers, it would appear you’ve lost sight of the “cross of Christ.” “Let not your heart be troubled” Unless you’ve already gone over the edge, I fear that you are teetering on the brink of insanity. The whole world is against you...right? Do you honestly believe that any of these people (that you’ve sued) gives a tinkers damn about you? Well I do, because (whether you know it or not, you are a brother in Christ and a Child of God and you matter. May our Lord Clear your mind of the abundance of Cobwebs therein and give you peace.”

to former client Townsend confirms and shows his malicious threats and contemptuous anger towards Townsend and Townsend ET AL. proved as truthful based on the discovery finally ordered in 2006 by judge Crenshaw. This “hate” letter shows at some point in time, even back to the first consultation in July 2000, Scruggs refused to give proper legal counsel to Townsend and as Townsend ET Al. and allowed and assisted in “Felonies and Hate Crimes” as Scruggs confessed 09/30/2003, “My personal convictions do not allow me to make a Church look bad” and “I never intended to bring the Church Matters into the Divorce case” but Scruggs rather than tell clients the truth of the laws chose allegiance to the co-conspirators who do QUID PRO QUO serve him more as he admitted to Stoddard he was “scared” of the deputies knowing the “deputies ET AL” conspiracy at the hearings of 11/15/2001 before judge Palomino and by

other proofs Townsend had told to Scruggs dealing back to Popper ET AL.

After multiple “Divorce Drafts” containing disclosures not in the trials prior to the 09/30/2003 termination of Scruggs and hid from Townsend shows the collusion in the Divorce Order/Injunction written ex-parte by Timmerman, Turmel and Scruggs ET AL even after Scruggs was terminated on 09/30/2003, and acknowledged by Timmerman that Townsend was Pro Se and admitted by judge Gomez in the March 2004 hearing with attorney Gray as counsel stated that Scruggs did ex parte malfeasance with judge Gomez the morning of this hearing causing judge Gomez to recuse himself.

The only logical answer to the events, deprivations, additions of damages added to the 2003 Divorce Orders not contained in the records [Quick \$10 sell of the home, no contact (since 11/2002) child interference with the children who were already 18, using a non approved Divorce Form, excessive amount of child support and alimony, and concealing the illegal acts and “unclean hands” of the mother] and blocking Church Records Discovery to prove the intentional collusion and frauds and Malicious Prosecution against Townsend in connected cases 01-15813 and 01-15814, is that Scruggs and Gray intentionally became Quid Pro Quo participants in the Popper/Chapin/Florida Bar ET AL Plots. The actions of Judge Arnold and Judge Crenshaw recorded in the transcripts explain the “rage” Scruggs

showed 9/30/03 when informed of their actions. Even Barbas in his 2007, Dismissal hearing admitted the original 02-03812 Complaint was sufficient and “short and simple” as Townsend had filed and proved now by years of litigation and showing of facts which prove the connected “Sect and Sect Agents” Pellegrini plots from Jeffers ET AL to Popper/Chapin ET AL.

Gray wrote fraudulent court papers, letters and uttered false reports since being retained March 14, 2003, to evade her legal duties to Plaintiffs and the courts and to conceal her conspiracy with Scruggs ET AL.

Judge Cook illegally allowing Gray to litigate for herself and the Gray ET AL. co-participants in Cooks court in August and September 2009 confirms “conspired” undue process to never let Townsend or Townsend ET AL have a day in court to further report the Felonies he has confirmed since about 1987, shows further proof of extortion directed per these co-criminals.

The March 31, 2004, Transcript of the hearing in case 02-03812, before judge Crenshaw clearly connected and proved the conspiracy by the co-participants at that time. On 5/10/2006, finally Judge Crenshaw ordered “partial” discovery of FBCCP documents which verified Jeffers ET AL Felonies since about 1995 and before as Townsend reported to the FBCCP members, law enforcers and the courts as reported since 1995 till now.

Co-participants in 2010 still use the abduction of the Townsend

children as extortion to force Townsend to not pursue his FBCCP Contract duties as the FBCCP Supreme Court of Ethical Actions (Nominations Committee) which requires exposing all the frauds to and for the members and the Corporation and voting taxpaying citizens. Therefore the need of this Class Action in order to protect the citizens of Florida from all Thugs.

These 2006 FBCCP produced records also shows that legally member Townsend “with clean hands” is still acting per his Contract duties and any alleged “removal” from his officer position in the Church Supreme Court and other “offices” without a Church meeting with the voting membership was by an illegal fraud of the “Sect” under color of law frauds of “Sect sheriff deputies ET AL” and now terminated “alleged pastors” and “others”.

Facts as in letters as this example connect the Conspirator “Persons”.

“July 2, 2007
Corporal Renato F. Martinez, Jr.
Operations Corporal
Department of Investigative Services
Hillsborough County Sheriff’s Office
Fax 813 247-0900

Dear Corporal Martinez, Jr.:

First, Thank you and Col. Gary Terry for your allowing me to briefly recap this case with you on June 26, 2007, for about 1 ½ hours. Exposing to you only a few supporting documents shows you only a starting point of the violations of law done in this case!

Second, on June 27, 2007, I had the first time opportunity to review the Employee File of Pinellas Deputy Captain Timothy Jeffers and in said 216 page file found the attached letter of August 26, 1998, authored by then Major Gary G. Terry, Major Special Operations Division. This letter speaks to the connecting of a father/son after 19 years of separation and that now Col. Terry views “reuniting” and “family” important missions!

attorneys continue the frauds that with Dr. Lynn and his wife as Dean of Students continue to damage and deprive family members and destroy School Contract Rights!

- This connection of a small group of powerful people has led to destruction of many! The Conspiracy of these persons as still “DOE” because Judges, Attorneys, Sheriffs and others of Law Enforcement and Registered Agent John Grant Jr. continue now “openly” since 1999, to “Impede” and “Obstruct” my By-Laws Contract and Florida Statues 617 Duty (as Awana Commander, Long Range Planning Committee Chairman(LRPC) and Nomination(Ethics) Committee member to the Corporation to protect and serve the Corporation and General Voting Members(GVM) from frauds and omission of truthful disclosure’s and as a Citizen of Florida these Hillsborough County persons continue to waste tax payers time and dollars to develop the 18105 Gunn Highway site that in 1997, I told them “do not buy the property” as confirmed by the COGAN REPORT AND now years of ruling of Judges Arnold and Barton and the County Zoning Officers but Beck is still trying to conceal his theft to (of the \$600,000.00 Eminent Domain money) buy the property to just have the Earle Home, so “he could live in the country” and “have more bathrooms for his daughters”.

Also to note the illegal fraud to the GMV, deputies and the courts is the GANG did:

- Joe Howlett —Falsely reported to the States Attorney office and deputies and others
- Ron Beck --Injunction of 2001, case 01-15813, the lied as what Palomino Ordered
- Karen Townsend -- Injunction of 2001, case 01-15814,-- Lied to Children and Judges
- on behalf of the expanded “Gang”—the Amended Divorce Injunction (11/18/03) which is still in effect despite judges knowing it is gained by frauds, but this injunction is per Timmerman 10/03, “if you violate my Order, I will put you in jail” and this still prevents me from “seeing my kids” who were even adults when Timmerman/Scruggs/Turmel/Gray/Gomez/Sierra/Holder/2DCA and others desire this Injunction to continue so I cannot expose all the crimes still being done to my kids!
- Fact that my own now former brother in law—Steve Harrod as a V.P. with AmSouth Bank conspired with his sister my now former wife and did fraud to me and my kids, C.P.A Fraud, Tax Fraud, Church fraud with motive and evil malice of extortion with Beck/Brown/Jeffers/Howlett/Leatherman/Meister helping them get money and advise on securing finances for the Building Project, I had said was a “fraud and could not be done” and then used extortion that I had violated my kids in order to kidnap my kids, detain them in Pace, steal the marriage/home equity with the silence and help of Scruggs so not to expose his Frauds to me in July 2000-September 30, 2003 and since by the Exparte acts of Scruggs as even Gray said to Judge Gomez this June 26, 2007!
- that these same “DOE” persons gained that still cause damages still untold!

If Major Terry, worked to rebuild a father/son lost relationship with Captain Jeffers in 1998, how can them or anyone get or stay in the way of not helping me restore the “Victims Lost Rights and Relationships” as I can prove!!!!!!!!!!!!!!!!????????????????????????

Per the 06/07, threat of Duane Janssen C.P.A, until the Trustees/Finance Committee releases him to show his Financial Review Audit of 1999 and 2001, he will not ---Jeffers and Howlett and “Others” are still in 2007, illegally stopping this disclosure to me (as still a GVM Member, a Criminal Respondent, a Divorce Respondent, a Plaintiff, Pro Se and as a Father now permanently having lost all parental rights trying to restore his Church and family and Rights of ALL) and to other victims who are still being raped of money and mentally daily by their ongoing crimes people don’t want to believe is

possible because they are “Deputies”! It is clearer now that what attorney Denny said per the transcript of 06/24/03, “Some of the allegations are quite frankly a little bizarre, and it’s the kind of thing that they would like to have resolved.”-- HAS BEEN PROVED MORE THAN BIZARRE but is worse and even more illegal than known then!

Frankly, THIS CASE IS WORSE THAN THE DUKE LACROSSE CASE because just a few persons have been “NIFONGS”(sp) concealing the 1997, started crimes but their conspiracy and crimes are allowed continue by concealing NIFONG SCRUGGS & GRAY as Judge Gomez did just this week, until I had to “out lawyer” him again showing his fraud and “recusal” in 2004! Then STILL we have Stoddard and Barbas concealing Crenshaw, Grant Jr., CLA, 2DCA, JQC, Florida Bar, Denny and Scruggs and others!

I look forward to you with Sheriff Gee, Col. Terry and I.A. and the Special Fraud Unit stopping the criminals and having them prosecuted to the full extent of the law as still kidnapping and extortion and other crimes still keep my Children and Church victims “buried/detained in a plastic bubble” I have seen through now for years haunts me daily but because non elected Howlett and Jeffers do the concealment as “false trustees and deputies” one does not see the Couey like pattern just because they are “masked”-- alleged “deputies” or “clergy”!

God does not bless a fraud and Beck/Meister have used masked Jeffers and Howlett since about 1997, willfully in frauds to the GMV as they violate the BY-LAWS Contract!

The Jeffers/Leatherman “self audits” of the Church Books from 1997, based on reports I know of still never to this day have been Audited and Revealed to the GMV, per the BY-LAWS CONTRACT and per STATE LAWS!

Also in October, 1997, when the Church Bought the Earle Home, the leadership cried “this broke us” yet just 3 weeks later, Beck cried and retaliated against me as LRPC Chairman when I showed his use of the Earle Home was “not in the master plan” and a “waste of money (\$25-40K) he even claimed we did not have!

PLEASE NOW FOLLOW THE LAW AND STOP THESE CRIMINALS!

Thank you,

Randall Townsend

Cell Phone 941 350 2677”

Also this letter to HCSO Detective Mike Smoak in August 2002, after another time of his HCSO Illegal Car Chase of Townsend but not knowing of his roles in the “Sect” until reading the FBCCP Business Meeting

Production in 2006:

“Mike:

I respect a man who is looking for Biblical truth to serve righteously and one who when he sees wrongs is willing to take a stand!

You nor anyone else has yet to be informed on all the details as I have saved some issues for depositions.

My quest for TRUTH is because of the committees the Body asked me to serve on before Ron ever became Pastor! It is then that bond/oath to serve before Ron began his lies that even if I prove Ron is wrong he is not worth me breaking my promise to serve the whole body or God.

Know that you were brought into the loop due to Matthew 18:15-20, step II of informing a brother to “then take with thee one or two more, and also step III of “tell it to the Church”!

Also because you wife and I served together in Awana and she encouraged me to take a stronger stand to discipline those who were unruly, I thought I should inform you as I have. I at first did not take up her offer for you to council with me right after this first happened because I was trying to work through Gary who I trusted at the time. Gary later I learned was selling me out right from the start. I was trying to keep issues contained and secret as necessary so spilling all to all in letters has always not been done until many many previous steps have been taken!

I have had a Clerk of the Florida Supreme Court, a Clerk of the US Supreme Court, a legal staff member of Jeb Bush’s team, and Ken Conner a candidate for Governor, all compliment me on my logical and investigative and presentation of information skills in my previous lawsuit against my former attorneys, so know I know how to develop a sound basis and with facts can prove my case now against Ron and Bill and others involved in these crimes!

No criminal walks right up to you and openly confesses, usually. But Ron and others have been so blinded by their own pride and conceit that they have hung themselves by their own words and actions! All I had to do was be patient and wait on God to let them expose themselves!

As a Chairman of Long Range Planning and Awana Commander and Member of the Nominating Committee and Usher, I saw a lot from the inner circle of working with these men. Many Matthew 18:15 step ones I just let go and waited to see how responses were done. Their negligence and pride just got more out of control! Their open lying and stealing had to stop! Also when Bill did his deeds I as a father had to seek protection for my family! Because of Ron’s covering for his lying to my parents in 1996 and his directing the stealing of the Mike and his other many lies, this became him verses me on his issues and the acts of Bill and Herman were not investigated!

This is also obvious that the ones who are bonding to attack me are also the major players in the Finance committee as they are hiding the Books from me. In 1999, taking up the invitation from Elbert from the pulpit, I asked Tim Jeffers to see the Church books. I later asked Gary and Ron and I as yet never got a peak! This is the major question to the conniving!

Also Ron in 1996 in private council to my wife advise her to heresies which cause her to violate her marriage vow. My telling her sins is to prove how Ron’s advice causes sins and deceptions!

By the way your family was part of the Awana Bus camping trip on which Bill, Ron and Herman had us use a bus with no tag, no insurance, and faulty equipment that for weeks Bill had been warned to get ready. He then lies for over a year that it was Tammy’s fault!

A little girl did get hurt when a lattice fell on her even though Ron, Herman, And Bill all said they would take care of the problem all that afternoon before 6pm! None of them kept their promises.

When as a State of Florida Security Officer in 1999, I could not be put in a violation of State laws just because of the negligent actions of Ron and Bill! I knew crimes were being committed and I tried to stop them with the help of Gary but he was Finance committee and I underestimated his role in the money trial scandal!

Things have to stop!

Don't fear me or the truth as the TRUTH SETS ONE FREE!

I did not know standing alone would have caused me the loss of my family and I just trust God to keep them safe and to reunite us at some point. I have just tried to show Agape Love to everyone. But I have not nor will I lie in order to connive the outcome or process to fact finding!

In Christ's service, not man's, Signed Randy Townsend"

These are facts judge Crenshaw finally confirming Townsend and his claims and as openly admitted in her court in May, August and 09/07/2006.

Crenshaw then abruptly recused herself in violation of F.S.38 refuses the law and takes the 5th. Judge Barbas then dismisses the Complaint and backdates his Order several months before even notification of his Order to Townsend or Participants Attorney Charles Denny IV confirmed by Denny's letter on 09/11/2007. Bar/Barbas superiors ignore illegal acts as proof of their plots.

The 2DCA, the State Attorney (Ober), FDLE, HCSO, "others listed and as DOE" ignore this unlawful violation of Barbas ET AL and continue threats against Townsend including detaining Plaintiffs Rights free from "government" illegal intrusion and detainment by Deputies Jeffers, Howlett and Smoak ET AL in Constitutional and Church Rights.

Therefore, Townsend individual for himself and on behalf of his children J.D.T and J.G.T and as Townsend was elected since 1993, per

F.S.617 for the FBCCP/CPCS children, members and all the interested “class action” citizen parties betrayed by Candidate/Governor Jeb Bush ET AL. as for whom Townsend ET AL. still speaks to reverse illegal Government persons and “others” ongoing oppression of all Plaintiff’s Constitutional Rights immediately 03/14/2003, hired Attorney Heather Gray as a “two (Gray/Scruggs) against one (Timmerman/Bar ET AL)” strategy to get counsel for the Divorce issues that stemmed from the “sectarian” fraud issues at FBCCP and Townsend’s previous but now proved ongoing related defamation and deprivation at the hand of all defendants listed above herein with “others” as admitted facts are related by judge Marva Crenshaw (appointed by Jeb Bush) recorded in her transcript of 09/07/2006.

Later revealed Facts confirm that the Scruggs/Gray and “others” collusion was an intentional deception to conceal the ex parte Mens Rea collusion of Scruggs/Timmerman and “others” Mens Rea intentional malfeasance after the 09/30/2003 firing of Scruggs when Scruggs admitted “his personal convictions did not allow him to make a church look bad” and “he never intended to bring the church matter into the divorce” and as he told judge Stoddard in 2/2006, he was “scared” of the deputies as positions Scruggs withheld since his first consultation in July of 2000 and without that “candor to his clients”, “sold out all clients rights” giving the “church sect”

and “sect agents” complete authority and “non sect victims” for whom Townsend speaks still never an honest day in court as confirmed by the 11th Circuit Court of Appeals. The malfeasance of Grant/Scruggs/Gray clients rights allowed each to receive Quid Pro Quo payments in their Family Law Practices from and for their services in the 13th Circuit and other courts. This “silence” of Grant/Scruggs/Gray allows RICO practices still from Grant/Scruggs/Gray/Bush/Crist/Popper/Chapin/Fl. Bar/Jeffers/Gibbs/Terry and “others” as co-participants against Plaintiffs. To conceal Scruggs/Timmerman and those with them, Gray even refused to file the Appeal for the Divorce matters saying on or about 07/2004 “there are no grounds for an appeal of any issues or related issues” and maliciously delayed with frauds against these clients rights and her contract for services and her oath as an attorney. Emphasis added.

Scruggs even to judge Stoddard in transcripts of 02/2006, admitted his intentional fraud and malfeasance against his clients and against his “duty” because: he was “scared” of the deputies (Townsend alleges Jeffers/Howlett concealed by Smoak and Terry and “others” Deputies ET AL up the chain to the AG, Governor and Florida Bar leadership) and therefore “scared” to enforce any credible evidence to protect his clients and therefore he (nor later Gray ET AL) did not do the Subpoena discovery Townsend demanded

that he do since retained July 2000 and specifically confirmed on a faxed letter of 11/12/2001 in preparing for a defense to the “sect” **Aisenberg Rule** “uttered false report” as criminal charges filed against Townsend in case 01-15813 and 01-15815 and Divorce Case 02-4974, that would expose what Townsend was saying was true as was proved by: the partially produced documents per the Order of judge Crenshaw in May 2006 as demanded by Townsend ET AL. on 09/08/1999; and by the 09/07/2006 words of the transcript by judge Crenshaw and by the evidence admitted by these defendants at many times blaming others to defend their own criminal acts.

Multiple cases of which Scruggs was QUID PRO QUO, honored and paid as a judge or attorney even by the courts and Hillsborough County Commission prove his intentional malfeasance of his clients and these for whom Townsend speaks.

As Governor Jeb Bush and Attorney General Charlie (formerly a.k.a. “Chain Gang Charlie” now “Live and let live Charlie” so to ignore his legal fiduciary duties) Crist ET AL. advocated with attorney David Gibbs, III, (attorney and legal advisor since about 1991 for Townsend and the FBCCP) and argued for the Church Rights of the Family of Terry Schiavo (Also Husband Michael Schiavo is a co-worker of Deputy Jeffers in the jail) and also not advocate but oppose the Church Fellowship Rights of the

Family of Townsend to destroy these same Rights since 09/08/1999, proves the intentional malfeasance of Appellants and those for whom Townsend speaks. A second point of their double standards is that using the inside information Bush gained from Townsend regarding the Chapin Et Al conspirators, Bush himself stated he “won the election” by keeping Linda Chapin off the Buddy McKay ticket. (See FSCt. 98-2111) Townsend advocates this angered the Florida Supreme Court and thereby gave the Florida Supreme Court an ill motive to litigate 3 times against George W. Bush for Al Gore in the 2000 Election. Secretary of State K. Harris kept the voters Rights legal from even this Florida Supreme Court violations. Further to keep the Florida Supreme Court in “check mate” Attorney General Crist did not give the justices their “Oaths” of office thereby making rulings of the Florida Supreme Court illegal per Florida Law including rulings involving Townsend ET AL.

Exposing the acts of “law enforcers” deputies Jeffers, Howlett and Smoak and their “government superiors” leads to connect all defendants “intentional” criminal acts against “detained” and retaliated against Appellants/Citizens as stated herein as proved by the transcribed words of judge Crenshaw in 9/07/2006 trying to force a Summary Judgement for Townsend and avoid a trial which will expose **Pellegrini** co-participants

illegal acts Gray was retained to expose as judge Gomez said in 2004 about Gray's legal service to Appellants, "once your in your in."

The patterns of "government deprivations" via co-participants with judge Cook and the delay tactics of the 2DCA and the Florida Bar ET AL. is an illegal continuation of each judges and "others" political not "legal" judicial acts Townsend has exposed since about 1988 by their collusion with Orlando attorney Bruce Chapin and "other actors" including the leadership of the Courts, Florida Bar, Judicial Qualifications Committee, Governors, Attorney General's and agents to always subdue any Townsend claims.

The 2DCA and even the same Clerk of Court (Birkhold) even in 2004, reprimanded Gray several times for the lack of actions for Townsend Et Al now proved intentional fraud against clients Townsend ET AL resulting for which she was disbarred. The intentional unlawful acts of Gray are these same facts done by Popper, Chapin, Gibbs, Grant, Scruggs, Turmel, Denny, Rolfes and "participants others" as listed above and "others Doe".

The HCSO Colonel Gary Terry admitted and acknowledged he has been in a position of prejudice and bias and detainment against Townsend and those for whom he speaks since about 9/1998 (Terry/Jeffers Letter) and been able to taint, fraud and obstruct claims made by Townsend Appellants.

The Circuit Judge Cook being informed that: Cook was added as a co-

defendant based on her prejudicial Mens Rea display of violation of due process for defendants on August 19, 2009 and September 2, 2009, showing an “intentional Popper/Jeffers/Gray ET AL” continuing of contract violations, civil rights and interference with child custody detainment; and of this Bar Complaint, even in her order admitting her subjection of her superior Courts defies this Court, the Law and the arguments of these Plaintiffs against the estopped acts of now exposed Gray and all her co-defendants and dismissed respondents now Plaintiffs claims with prejudice on January 22, 2010.

On February 1, 2010, Plaintiffs submitted by Fax (11:48 am) to judge Cook and Mail to the Clerk a Motion for Rehearing (14 page plus Exhibit) which was not entered into the records and had disappeared, further showing defendants intentional collusion to avoid “due and equal process”.

Accordingly, presented for review in this petition are these questions:

WHETHER a sheriff deputy (Tim Jeffers), just as any “law enforcer” for his private and personal gain can under color of law can: violate a By-law contract; detain; obstruct due process; utter and create false reports; use fraud and collusion; and subject detainee(s) while under (Kolb) detainment subject detainee(s) to larceny, fear, assault, battery, bribes, extortion, abduction of children, interference with child custody, obstruction,

separation of family and Religious and Civil Rights.

WHETHER a deputy Jeffers, Howlett, Smoak just as any deputy for his private and personal gain can under color of law can detain their superior Church law enforcer to prejudice or extort the outcome of the superiors decisions.

WHETHER while fellow officers observe, can they ignore and conceal violations of law by Jeffers ET AL, against the FBCCP Corporation, Of By-Laws, Of Members Rights and Of Tax Payers Trust and as they violate their Oaths to serve and protect even using Church and Taxpayers monies and properties and even their own children against honest citizens.

WHETHER while fellow “law officers” participate and or more than observe but act also in “Constitutional Bad Behavior” can judges ignore and participate in Mens Rea acts the Contracts and Tax Payers said Jeffers should not do as the Church members fled, voted “Odious and Outrageous” and “NO”, and collectively terminated FBCCP employees pastors Nasworthy, Brown, Meister and Beck for “uttering false reports” when the “false reports” were finally “partly” revealed by law enforcers.

WHETHER any past, present and future law enforcer and Florida Bar Member legally can continue detainment of life, liberty and pursuit of happiness and prohibit recovery of per se detainment and deprivations and

then claim Justice is done per Constitutional Law and claim they fulfilled the obligation of The Florida Constitution clearly states at:

“Article I. Section 3. Religious freedom.—There shall be no law respecting the establishment of religion or prohibiting or penalizing the free exercise thereon. Religious freedom shall not justify practices inconsistent with public morals, peace or safety. No revenue of the state or any political subdivision or agency thereof shall ever be taken from the public treasury directly or indirectly in aid of any church, sect or religious denomination or in aid of any sectarian institution... Article V. Section 2.(a). states:

...and requirement that no cause shall be dismissed because an improper remedy has been sought...”. Emphasis added.

WHETHER any “law enforcer” can say as Florida Bar Assistant Staff Counsel John B. Root, Jr. stating “This is the worse case of abuse by an attorney (Popper/Chapin) on a client in my 27 years of investigating cases for the Florida Bar but my boss has told me to close this file and never talk to your again” and then no justice was never served by any attorney including Heather Gray for their clients still in 2010, can any “law enforcer” do justice for these victims and still prevent this father from his rights with his children since they were abducted October 20, 1999 and rights to continue his Church Investigation since 1995, and reporting of additional felonies by “government” co-participants since 1988.

WHETHER any citizen can have confidence and trust in their “government officers” to protect Constitutional Rights based on the evidence

in this case.

If this Court answered any of these questions as “NO”, then this Court knows justice is not served as the criminal acts since as “Doe” herein as attorneys Popper and Chapin in 1988 through each participant defendant by Jeffers et al still continue their frauds because Gray and Gray agents did not properly report and represent her clients as she was retained to serve including restoring the legal rights of a wrongly detained citizen with his children as extortion to keeping criminal acts of law enforcers still concealed. Emphasis Added.

As it should be the goal of a court per their Constitutional Contract duty to do justice and handle disputes. Clearly any justice from these years of complaints since the first Townsend “9-11, What is your emergency?” call—“My attorney David Popper and attorney Bruce Chapin are lying to me to conceal their frauds and malpractice” and felonies of my former Joint Venture business partner, now consolidated in 06-CA-006005, herein shows a Mens Rea connected pattern of “self-dealing” “law enforcers” and “others” numerous violations of Plaintiffs Constitutional and Contract Rights and Due and Equal Process Rights. It is clear from the litigation of these cases that all co-participants knowingly violated the law and continue to ignore their duty per the law and illegally in violation of “Due and Equal Process”

assist the “sect” lead by deputy Tim Jeffers using years of Tax Payers Funds, Church Funds and Government Funds and his co-government persons to illegally detain Townsend and Townsend ET AL.

Plaintiff Randall Townsend, (Townsend), Pro Se, and more than eighteen years of age, as for all Plaintiffs/Appellants ET AL. per:

1. **Florida Statue §617;**
2. **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.”
3. **As** a “respondent to felony criminal charges” filed as part of the defamation and criminal enterprise (01-15813; 01-15814 and Divorce Case 02-4974), and never had an Honest Day in court;

COMES NOW AND FILES THIS AMICUS BRIEF AND NOTICE FOR JURISDICTION FOR MOTION FOR REHEARING AND RECONSIDERATION to Obtain WRIT OF PROHIBITION AND WRIT OF CERTIORARI AND WRIT OF MANDAMUS BY A WRIT OF CORAM NOBIS AND WRIT OF HABEAS CORPUS TO STOP THE DISHONORING OF APPELLANTS AND THE MENS REA MALICIOUS CONSPIRED “SELF DEALING” AND VEXATIOUS “IMPEDEING” AND “UTTERING FALSE REPORTS” BY GOVERNMENT PERSONS AND OTHERS AS CO-CONSPIRATOR

PARTICIPANTS ONGOING CONTINUIOUS CONSPIRED

AISENBERG RULE Government Persons violators under the directives of the informed: Governors; Hillsborough County Sheriff(s) (HCSO); Pinellas County Sheriff(s); Courts and listed defendants and still “others Doe” and HCSO Col. Gary Terry’s informed deputies concealing the Felonies and uttered false reports of Pinellas Deputy Tim Jeffers and their “superiors” DEPRIVATIONS OF CIVIL AND CONTRACT RIGHTS by their “uttered false reports” as stated by Federal Judge Merryday and Federal Judge James Moody Jr. (03/15/2007), as stated in this case and these underlying enjoined cases, facts and documents supported by verified affidavits found at www.Judgeoneyourself.com and other papers show the “intentional” “malicious” “odious and outrageous” betrayals of each defendant to their “Oath” to serve Constitutions, Contracts and Rules of Law and Public Jury Justice and Plaintiffs.

If any doctor of one of these “Justices” said “you have terminal cancer(s)” or “Rabies”, would you treat your symptoms with an aspirin and ignore the disease(s) or treat the cancer with medications, radiation, chemo or amputation to save the life, liberty and pursuit of happiness of contract rights and property? Appellants have the right to protect religious rights.

You would say it is your right to choose your care and if it is later

revealed your doctor “conspired” (or alleged clergy) to harm you against your wishes “to get paid more” then you would hire a lawyer to serve you. When that “alleged” lawyer or “law enforcer” later exposed his own “self dealing” agenda you would scream all the way to the highest court possible. You would also immediately seek a new doctor (or Clergy) or “law enforcer” who blocked proper medical care! Especially for your child.

Ignoring what caused the symptom of conspired Mens Rea intentional torts of Heather Gray to her clients and Heather Gray ET AL means this court and “justices” (not protected because of not taking your oaths of offices because of negligent A.G. Crist in Supreme Court earlier rulings) becomes her accomplice --using an aspirin to the cancer the FBCCP Church Pastor Dr. John Berry and Respondent Randall Townsend tried to expose, treat and receive relief but Plaintiffs herein have been plagued and intentionally deprived by “law enforcers” led by deputies Tim Jeffers, Joe Howlett and Mike Smoak and their “government superiors” “maliciously” intentionally uttered false reports for “abuse of process”, fraud, obstruction and extortion and to preserve their self dealing while conducting “abusive malicious litigation” and Habeas Corpus over the Church Corporation Rights, the members rights and abduction of the Townsend kids from this Respondent Randall Townsend still even in March 2010 being visited and

threatened by the Hillsborough County Sheriffs Deputies at the demand of defendants for Townsend to not report criminal acts and receive relief of or from these criminals and their ongoing acts!

In the legal sense this case now shows and with “due process” “access to the courts” and “access to public records and meetings” can expose additional criminal violations of victim rights and property by Defendants individually and collectively to conceal preservation of their criminal intent for power and self dealing but defendants refuse citizens: “Right to Justice”; “Right to access to courts”; “Right to Assemble”; “Right of Religious Freedom”; “Right of Freedom of Speech and press”; Right as Free From Government and so many our Contract Constitutions give us victims.

Defendant Charlie Crist as individual, Attorney General, and as Governor has had and confessed publicly his own personal serving motives to advance his own “self dealing” while ignoring the “duties” of his elected “State” offices. Yet the crimes he ignored still deprivate Plaintiffs.

Plaintiffs now can show the Jeb Bush and Crist agenda of an intentional “abuse of process” for himself and his co-participants acting against “citizens” and Plaintiff believe can be shown “prejudicial manipulation” of even this Florida Supreme Court to serve Crists’ own personal agenda rather than justice and the citizens of Florida.

Defendant John Grant (Florida Senator, Registered Agent) ET AL. has in 2010, revealed and confessed his “improper motives” “vengeful” “malicious” intentional tort actions and those malicious “improper motives” as torts of and for Jeffers/Beck ET AL against Plaintiffs even still obstructing and threatening with his malicious co-participants sending deputies, directing the judges and threatening Plaintiffs family to “impede” Townsend in 3/2010, to not write this brief seeking relief, or expose corruption of tax payers, the FBCCP and FBCCP members or Plaintiffs face further ongoing criminal prosecution and deprivations while defendants still conceal themselves.

The Florida Constitution Article I. Section 3 and other laws reveal the “public morals” “improper motives” vengeful violations of defendants and defendants “culpable shams” to Dishonor and Deprive Appellants.

In the citizens civil actions the “Rules” have become so complex and the possible causes of action are so left to the “agenda” of advocates one must hire to navigate the rules—justice and access to the judge is not served especially in actions involving “law enforcers” who have their own agenda.

Co-participants as “law enforcers” of Heather Gray ET AL. trained her to do her “vengeful” “malicious” actions just as Dr. Pavlov trained the dog how they wanted it to act. If the dog acted outside the required training

it got no food just as Plaintiffs allege Heather Gray was an extension of those “malicious” co-participants who needed and rewarded her “intentional” “betrayal” and malicious prosecution to her clients to conceal “self dealing” “law enforcers” as extensions of the “malicious” “sect” including the vindictive biased members of the Florida Bar. Instead of treatment per her promised care she infected more “Rabid” and “Rage” to her clients. It is only until the mass of those damages becomes too great to ignore did the Florida Bar system finally start to expose her bites.

Each co-participant under the influence of Harkness and Berry, the Governors, This Supreme Court with Gray has an ulterior motive to still dishonor and deprive Plaintiffs and to contribute to conceal “law enforcers” “ongoing” “self dealing” and “impeding” Plaintiffs from their contract rights, Constitutional Rights and property.

Heather Gray for Heather Gray ET AL. knows how to ignore and intentionally neglect the duty she obtained to advocate the causes for her clients and knew and knows the duty she intentionally neglects to continued the willful torts for her “malicious” co-participants “law enforcers” as she and her co-participants allows her clients now former clients to still be victims of ongoing “rabid” frauds, maliciously abused and prosecuted.

From the wording in this Supreme Court’s Order regarding Heather

Gray it appears that victims rights are still being given malpractice to endure more “unlawful detention”, “malicious prosecution”, “abusive litigation” and “abuse of process” to prove themselves victims now just of Heather Gray but of the others “Doe” in the system who ignored her “bite” all these years since my first yelp in 2004 to the “law enforcers” about her intentional violations of law and her clients.

If this Supreme Court desired “justice” then allowing “judge Cook” or “others” to “protect” and conceal Gray and her co-participants “abusive litigation” would not be the “duty” citizens expect of the Honorable Court.

STATEMENT OF THE CASE AND OF THE FACTS

On or about 1987, Townsend reported to his attorneys (Patricia McCarthy, then David H. Popper) violations of Contract and the Law by his Joint Venture business associate, Lane. Since or about 1988, Townsend reported to all his attorneys further torts, breaches of contracts and frauds.

Attorney David Landis of Austin, Lawrence and Landis later reported Popper was advised to leave the firm upon learning Popper had failed to properly report and represent Townsend and his company Future Marketing. Popper then joined the firm of O’Neill, Chapin, Marks, Liebman ET AL.

When Popper failed to do “timely Discovery” of Townsend/Lane Contracts, Popper and Chapin did charge over \$45,000.00 in legal fees and

began a strategy of ruin their client Townsend in order to not let Townsend prove his damages against Lane and the Dishonoring malpractice of Popper and Chapin ET AL intentionally harming the client Townsend even more, nor taint the Chapin ET AL. law firm and “others” including Linda Chapin.

Discovery shows Townsend was illegally: defamed in a false public light; told frauds; prohibited by Lane, Williams, Popper and Chapin from keeping his clients, lost contracts and business with new clients; and when Townsend refused the dishonorable “multiple bribe(s)” of Chapin and his Chapin/Powell ET AL. agents to “take a settlement” (per the Chapin Mediation Report of July 1, 1992, and other documents) and not have a trial which would expose the “malpractice, felonies and damages” of Popper/Chapin ET AL. including Gray ET AL. still conspire deprivations against Townsend and Townsend ET AL. as reported and connected herein and even more by additional discovery being “impeded” by co-participants.

On or about 1/1995, Citrus Park Christian School Pastor/Principal Dr. John Berry, (Dr. Berry) advised and appealed to this, Father, FBCCP Parent, Ethics Supreme Court member and Long Range Planning Committee Chairman, and Awana Commander Randall Townsend (Townsend) that he (Dr. Berry, different person from Florida Bar John Berry) and “others” was concerned about By-Laws violations within FBCCP/CPCS that would

damage the kids, CPCS School and FBCCP Church because of the “self dealing” greed of the “Sect”. Note the 1/22/1995, FBCCP 2nd Quarter Business Meeting Report heated exchange between members when Finance Secretary Paula Powell and Nasworthy revealed a \$5,112.03 payoff to Nasworthy and more undefined to “others” from CPCS through FBCCP in strict violation of the written 5/22/1994, FINANCE COMMITTEE POLICY that it is “deception to members” and “not allowed” to alter funds of line item budget accounts without full disclosure and vote of the membership.

Ron Beck soon after arriving as the new pastor demanded more pay, larger car allowances and other benefits as hiring his wife (April Beck) that the “Sect” complied with but did not inform the members per the By-Laws of the compensation changes also designed to evade taxation as confirmed “scary” by C.P.A. Mr. Horgan when Townsend contacted him in 2006.

As the FBCCP Supreme Court Ethics Nominations Committee Member, per the By-laws, Dr. Berry and Randall Townsend started an investigation of the facts alleged by Dr. Berry that the new Jeffers Finance Committee, employees and “others” after the retirement of Senior Pastor Dr. Harold Warner had and were misusing Designated FBCCP Church/School Corporation Donations and Tuition’s and doing “secret business” without the consent per the By-Laws of the members votes in business meetings.

Tim Jeffers as Finance Committee Chairman (per the By-Laws is subordinate to this FBCCP Supreme Court Ethics Nominations Committee Townsend member) as under color of law, Tim Jeffers Deputy Pinellas County Sheriff and his agents have blocked the rights of the Membership to this Demanded Investigation Process members demanded since 1995 by Jeffers/Howlett ET AL violation of F.S.§775.03 (Unlawful Benefit to Clergy) and F.S.§ 871.01(Disturbing schools and religious and other assemblies) for personal gain to prohibit the Contract Lawful Rights of Townsend's Led Investigation of the pastors and "Others" misuse of funds for self-dealings and "uttered false reports".

Townsend even proved as the lawful dutiful 1993-now "elected" member per the 2006 Production per the Court Order of judge Crenshaw still tries to show all "Jeffers/Howlett/Smoak/Powell/Beck/Meister/Agents ET AL Sect shams" even when Jeffers/Powell/Beck and HCSO unlawfully filed additional false reports (confirming ongoing "fraud, collusion and arbitrariness" by Jeffers/Beck/Powell ET AL) to the membership and by batteries and false detainment falsely removed Townsend from the FBCCP Business Meeting before being allowed to speak and also issues HCSO Trespass 07-650130 on 10/28/2007.

Additionally, Townsend on pages 19- 20, in Federal Complaint Third

Amended, 8:06-CV2050T-30-TGW, filed as Ordered in 12/2007 states:

“Pat Bean upon becoming Hillsborough County Administrator has planned intentionally, recklessly, willfully and knowingly directed deprivations using her political powers over “others” against these Plaintiffs based on facts just learned in the past few weeks discovered for the first time the following circumstances in the manner set out namely, that Pat Bean and Board Chair Jim Norman did willfully and directly impede Plaintiff Townsend from in addressing the Board of County Commissioners at the November 7, 2007 in the public forum on the same day Commissioners voted on a 2 year Contract extension and 3/5% pay raise for Pat Bean and also by direct intentional ignoring Plaintiff Townsend’s demand to review the “County public records” files and undisclosed FBCCP files and Court files and “permit” requests of the FBCCP Gunn Highway Properties as under State and County Law Pat Bean has the superiority over Sheriffs, County Officers and County Courts and “others Doe” and defendants herein...”.

Multiple Mens Rea QUID PRO QUO illegal acts of Pat Bean ET AL have been reported even for the direct and personal benefit of Gray, Scruggs, Gee, Grant, and “others”. Pat Bean was “removed” from her Administrative Position for the same and similar causes as these Townsend ET AL Citizens and Church members protested and removed Pastors and Administrators Nasworthy, Beck, Brown, Meister and “Others” yet Plaintiffs are still in Mens Rea “collusion” being “impeded” by defendants and “others Doe”. What would this Supreme Court do if Jeb Bush abducted your kids because you won and would not let his brother George W. Bush be President?

Again FDLE in 4/10, admitted “collusion” to not connect these acts when Townsend reported the unlawful “Crist/HCSO/Abbot Like” extortion

obstruction of Jeffers/Grant/Gee/Ober ET AL sending HCSO Detectives on 03/31/31, telling Townsend to “stop contacting” Grant or “others” including his kids. Therefore, this is a continuation of the illegal detaining of the 1995 FBCCP investigation Townsend is still per his FBCCP Duty is legally doing.

Per Avila South Condominium Association Inc. v. Kappa Corp. 347 So2d 599, 6006 (Fla. 1977) and First Union National Bank v. Turney 824 So2d 172, 188 (Fla. 1st DCA) review denied, 828 So2d 385 (Fla. 2002), per the Contracts and “Oaths” of these Defendants Duty and Breaches of Fiduciary Duty as per Avilia:

“While occupying such a fiduciary relationship, the officers and directors of a corporation are precluded from receiving any personal advantage without the fullest disclosure to and assent of, all concerned.”

Per PROSSER, LAW OF TORTS 846 (West 4th ed 1971); this PLOT OF “Governmental Intrusion Right of Privacy Article I, §23 Florida Constitution issue was clearly defined by this Florida Supreme Court in Winfield 477 So2d at 547. Additionally, the FBCCP By-Laws clearly prohibit non members “intrusion” or “impeding” the By-Laws as Deputy Jeffers ET AL Sect has done since his Under Color of Law acts began to counter the legal standing of Townsend per F.S.§617.0304(3) and (2)(a), standing per:

“By-Laws “CHURCH POLICIES...D. COMMITTEE: RESPONSIBILITIES AND POLICIES 10. FINANCE. J.) A detailed and comprehensive report of all receipts and disbursements, balances, etc., of the Church and Christian School, shall be given at the quarterly business meeting in writing. Assets and liabilities are to be reported once a year. K) There shall be an annual audit, under the supervision of the Finance Committee, of all books pertaining to the Church and School funds, and a report made to the Church each July. L) No purchase shall be made by members of the Church, Christian School, departments or organizations, except within the limits of the budget and approved by the Finance Committee or Business Administrator.”

The 1995 admissions of Jeffers himself and Administrator Nasworthy, Beck, Leatherman, Meister, Powell and Dr. Berry and “Others” was that “Budgets” were violated, “Falsely Reported”, Money used without approval of members from “Closed Accounts”, money diverted within Budget Lines without members vote. Because of Jeffers ET AL Agents the members truthful inspection of all documents as Townsend Ethically demands since 1/1995 as per the By-Laws has been “impeded”.

It is now proved as it has been to departed members and now to the public, Tim Jeffers gains the support to his “sectarian” Mens Rea unlawful acts and violations of the FBCCP By-laws and members by the fact that he as a Deputy acts “under color of law” fraud and illegally allowing the “get out of jail free card” to now terminated Senior Pastor Ron Beck, Herman Meister, Elbert Nasworthy, William Brown, various employees as Karen Jeffers, Paula Powell and family, Gayle Lynn and husband, (including

Townsend's former wife Karen Harrod Townsend), Gary Leatherman and "other sect members" led by (Registered Agent and Senator) John Grant, Smoak (Ober/Terry ET AL), Howlett and Corbin to "utter false reports" as: "their oath to obey the law and contracts"; FBCCP Quarterly Business and Committee Reports since 1/1995 or before; granting the "self-dealing sect" unknown misuse of Corporation funds for gaining "self wealth" and Tax Evasion Purposes; and as a "Sect" maintained a fraudulent scheme to obtain "eminent domain" funds and as a "sect" created "fraud to the members to by unusable property" (Judge Barton in 2006 again denied "special permit requests" as Townsend and other experts in 1997 said), (18005 Gunn Highway now with great debt has been put up for sale 04/2010) so "Beck could have a new parsonage" with "more bathrooms for his daughters and live in the country like his brother Donnie" and "knowingly false building plan" as long as the "Sect" appointed Tim Jeffers wife Karen Jeffers (unqualified per Supreme Court FBCCP Nominations Committee) as School Principal bypassing by these "sectarian" self dealers the Rights of the Supreme Nominations Committee and Membership votes.

The Jeffers ET AL "sect" "uttered false reports" to conceal Finance committee self dealing frauds and caused the defamation Per Se and termination of employee Dr. Berry (replaced by wife, Karen Jeffers without

members By-law voting process) and started the defamation Per Se to member Supreme Court Townsend and his still ongoing investigation for those for whom he speaks. By Fraud, Trustee Jim Kerns was replaced by Gary Leatherman and then Tim Jeffers replaced Gary Leatherman when Leatherman fled when the 2006 Crenshaw Production was ORDERED.

It is also now proved that deputies Jeffers, Howlett, Smoak and as the Church Sect are unlawful members and are knowingly and intentionally allowed and still allowed to violate Plaintiffs per the direct intentional orders of their government co-participants co-conspirators concealing frauds.

Because of deputies Jeffers, Howlett, Corbin and Smoak blocking Townsend exposing the “True” FBCCP Business Records since 1995 to the membership, the “Church Sect” illegally deprived and dishonored Plaintiffs/Citizens per the Florida Constitution Article I. Section 3. Misusing our State Funds, Federal Funds and our own Church/School Funds against us as Members and Citizens and our knowledge or Voted Mission Quest and therefore “inspection” of all Defendants and “others” complete records are necessary in this litigation for all Quid Pro Quo “self dealing” exposure.

The law and FBCCP Contract do not allow any person or “law enforcer” to “impede” or “utter false reports” or “threaten by unconstitutional detainment” to the Townsend Nominations Committee

Investigation ongoing since 1995 per F.S.§617, and all Contracts and Laws, or said violator is breaching an Oath to a contract and the law and Religious duty and Constitutions and violates his “oath”, and duty to the FBCCP Corporation, Contract and fellow members and causes defamation in the “public light”. The FBCCP By-laws define “due process” defendants violate and to “members” and the “public” define “odious and outrageous” malice and fraudulent practices. The abduction of the Townsend children on 10/21/1999 and the illegal detainment of said kids from this father even in 2010 confirmed by exhibits here prove felony illegal detainment and various other crimes still ongoing by deputy Jeffers ET AL.

Many who as members and citizens understood the “sect” and “sect agents” and had to depart the FBCCP membership and CPCS School for their safety and honest knowledge of how their funds were being used and thus damages the “public light” of the FBCCP Ministry and members that the Jeffers et al “sect” will deprivate them as done to Townsend and his abducted kids (since 09/08/1999) and tax payers. Defendants since or before 09/08/1999, used intentional frauds and extortion against Townsend and his minor children in order to continue their vengeful malicious threats still in 2010 as this plays right into the plots started by attorney Popper and Chapin.

As departed and or quiet members and as all citizens of Florida

knowing these proved related facts now make this a “class action”.

These facts of “uttered false reports” and miss use of members and members property have been confessed by Administrative Pastors Brown and Nasworthy and by CPCS Principal Herman Meister on his Jobster web site, Church Leader Gary Leatherman and by Janssen & Horgan C.P.A. Mr. Janssen, Finance Committee Members Rick Holbin and Derryl Boyette, HCSO, Judges, “honorable law enforcers”, Registered Agent Grant and “others” and now they accept the claims of Townsend per Dr. Berry as “True”. Even Jeffers himself 10/28/2007, while unlawfully trespassing Townsend with the illegal cooperation of HCSO ET AL. from a FBCCP Business Meeting bragged of his and “Sect” years of “uttered false reports” and manipulations of laws and evidence with co-participants making again threats of he will use his Deputy Powers to find out where Townsend lived and worked so to continue his extortion and frauds. These illegal conspiracy acts and illegal use of Government Property to defame Townsend where he lived and worked caused the terminations using the intentional “frauds” and illegal actions of Popper/Chapin ET AL and Jeffers/Beck/Denny ET AL. as the termination from Kmart was a direct result of illegal actions and frauds of defendants. Since the 11/2/2007, Grant e-mail, Gee and Ober have openly, knowingly and intentionally “conspired” and “arbitrated” to do

“fraud” and deprive by blocking rights for whom this Brief Speaks.

Even judge Marva Crenshaw and now by Quid Pro Quo from Charlie Crist is in the 2DCA, on 05/10/2006 as circuit judge finally Ordered Partial Records Discovery as demanded (100 plus times) to “Jeffers ET AL law enforcers” since 1995 as she tried to unlawfully and forcefully extort to “broker” a summary judgement deal only for Townsend not Townsend Et al. just to “block members rights” and conceal all “Jeffers ET AL uttered false reports” and the Jeffers sectarian agents per her superiors illegal directives.

Despite Gray or Gray ET AL. filing no answers in appeal 2D, 10-774, the 2DCA gave multiple extensions to Gray and Gray ET Al and still knowingly ignores Gray Co-participants illegal threats Dishonoring Plaintiffs during these 15 plus years! On 09/07/2006, Crenshaw admitted the damages of Plaintiffs and that defendants listed in the August 10, 2006, Third Amended Complaint 02-03812, had violated their Trusts to Dishonor Plaintiffs. Crenshaw therefore on 09/07/2006, confirmed “showing of fraud, collusion or arbitrariness on the part of the church authorities having jurisdiction of the controversy”. The courts records State and Federal (M.D. NO: 8:06-CV2050T-30-TGW) in whole and with additional blocked discovery as the 11th Circuit Court of Appeals (case 08:10721A) ruled in this case is a conspired violation of each other participant and “others Doe” as

charged specifically showing violations of R.O.C.P. 4-3.4, FAIRNESS OF OPPOSING PARTY AND COUNSEL and 4-3.5, IMPARTIALITY AND DECORUM OF THE TRIBUNAL since about 1988 from Popper ET AL.

When Townsend refuses to violate the Trust from the FBCCP membership vote of 1993, put in him and take the Crenshaw illegal bribe by her Summary Judgement, then Crenshaw does the same violation of Trust, Dishonors and recuses herself in violation of F.S.38 and takes the 5th .

Further records show Crenshaw ET AL granted HCSO Sheriff David Gee and “co-defendants” illegal “fishing expedition” discovery rights in violation of Civil Rights of Plaintiffs in order to abuse Townsend Plaintiffs.

Knowing this Deputy Jeffers has been concealed by his fellow deputies and “law officers” and “others” including through judge Cook and again by the Clerk of the Second District Court of Appeals as sued above herein as they continue to create ongoing deprivations. Even Supreme Court Clerks officers have refused process of legally filed papers.

Worse than the abandonment’s recorded by this Court (SC09-1121) by Gray as she left her clients in prison while she neglected to do her duty, Gray for her client Townsend et al., now disbarred Gray intentionally conspired with “others” to Dishonor the law and her clients and rights as she wrote a letter (2004) to Attorney Stanford Solomon showing concern for the

health of her clients and told this client 3/2004 “do not try to see or discover the medical conditions (son heart issues) of your [abducted] kids” until “she says it is okay”. An action she never attempted as the pattern shows she blocked to serve her co-participant trainers. Rulings of judge Cook in August and September 2009 continue to obstruct specific obligations Gray and her “trainers” agreed to do in the parent/child/Church reunion quest.

The health questions as raised since 1999 and before, by the J.G.T. and J.D.T. CPCS Employees exposing the collusion by CPCS Principal Karen Jeffers and Dean of Women Gayle Lynn and her husband Dr. Lon Lynn(lawfully served 8/2000) with co-participants and as exposed medical malpractice and child neglect and confirmed Dr. Hoyos and Dr. Milan and “others” because of the bullying, missing school and “altered” school issues and lingering permanent conditions including related heart conditions and mental distress **Has never been answered to this father that his children are cured and safe.** Townsend and his medical experts know the illegal drugs and acts of the mother ET AL. deprived the medical conditions of J.G.T. and J.D.T. still ongoing and depriving further recovery.

This deprivation and “interference with custody” was never answered and no “okay” has never been given since the promise on March 14, 2003 when Gray was hired and still is guilty of Mens Rea intentional conspiring

caused by Gray and her co-participants to conceal and oppose anything Townsend states that shows the Dishonor of corruption by “law enforcers”.

“Undue and Unequal Process” by government officers “for personal gain” continue in this related FBCCP Et Al. case since the “plot to conceal acts of the malfeasance” of attorney David Popper (SC98-1866) and then the uttering false reports by attorney Bruce Chapin (SC98-2111) for political gain for his wife Linda Chapin as Orlando County Commission Chairwoman and as vetting for Lt. Governor with Buddy McKay began and in the political race for Governor with Jeb Bush (Bush) and Charlie Crist (Crist).

Candidate Jeb Bush “uttered false reports” directly to Townsend as broadcast on WTVT Fox 13 in Tampa when he answered the question “What do you do when you find the Florida Bar is lying to you?” and Gov. Bush supporters led by Charlie Crist and “others” act in continuation of the conspired deprivations including “uttered false reports” against Townsend’s contract rights since 1988 by Popper, Chapin, Judge Rom Powell, The Florida Bar, and Jeb Bush and Charlie Crist using judges as Crenshaw (Bush appointed and Crist appointed to the 2DCA) did and finally 09/07/2006 tried to “broker a private settlement” so as to never let things Townsend said in Third Amended 02-03812 and other related complaints be revealed and proved as true connecting back to the 1987 criminal acts of Townsend’s

former temporary contract business partner that Popper Et Al. intentionally unlawfully concealed to not expose Poppers legal malpractice.

Even though Gray or Gray Et al did not answer the Plaintiffs Appeals filed in 2D,10-774, now over 10 months later multiple excuses and delays are being conducted by the 2DCA.

Each defendant above and “others” impedes and betrays contracts and breaches contracts Gray and her co-participants and superiors knowingly agreed she was retained to honor and enforce.

Each defendant participant has been biased and prejudiced for those against Townsend since the malfeasance of Popper began to conceal his betrayed negligent service and fraud as Townsend claimed (SC-86-918 Townsend v. Lane; SC-98-1966 Townsend v. Popper; SC-98-2111, Townsend v. Chapin).

Basically if you reject Townsend’s proved claims herein by 15 plus years of litigation this court is “Dishonored” and “BOXED IN” saying: that a “law enforcer” or “politician” when he does not like your legal ruling against his breach of contract as per your duty of a Supreme Court (or Church Supreme Court) the deputy and politician has the power of his position to “retaliate” and take or “interfere with the custody” of your children, rights and property in order to extort you

to serve his pleasure; Or also this court would be saying that judge Crenshaw attempted to commit a fraud on 09/07/2006 by “brokering a summary judgement” to the extorted detriment of plaintiffs for whom Townsend speaks herein. She took the 5th when questioned 9/07.

The only truthful and honorable solution is to finally take the deprivation claims of Dr. Berry since 1995 and Townsend since 1987 as True and restore Plaintiffs from all deprivations.

In 1993, FBCCP elected Townsend and his family into the membership and soon thereafter unanimously elected Townsend on the Nominations Committee as the Ethics Supreme Court for the membership. Townsend was also elected as the Long Range Planning Committee Chairman and as Children’s Awana Commander. Per the FBCCP Contract duty of these positions Townsend and “others” in 10/1995 called on FBCCP member Tim Jeffers to investigate and properly report acts the membership questioned of FBCCP employees and the Finance Committee. Member Joe Howlett as a Trustee and HCSO Deputy was also informed and admitted violations of contracts and laws. Member Tim Jeffers used his “badge” and “biased” “law enforcers” as Deputy Tim Jeffers then and since to “impede” FBCCP members knowledge and rights. On 06/26/2007, HCSO Gary Terry and Corporal Martinez admitted the betraying frauds and Felonies of the

Jeffers ET AL sect including the acts of HCSO Fraud Detective Smoak but still continues to against the law deprive and obstruct Plaintiffs herein.

Only frauds of the sect keep Townsend from his duties to the Membership and his own family thus admitting the “Terry Deputies Aisenberg Plot” and showing a pattern that Gary Terry Fraud Detectives were trained to practice to win a case and conceal the corruption of co-participants.

Unlawful Benefits for Deputy Tim Jeffers and his “sect” before or about 10/1995 is again proved ongoing by this Florida Supreme Court accepting the Consent Judgment of Heather Gray and by lower courts dismissal of the underlying consolidated cases with prejudice against these Gray et al victimized Respondent/Plaintiffs who state:

JURISDICTION AND PROOFS OF CRIMES

The Jurisdiction of this Court is invoked by this Court under:

1. The Courts own authority to maintain supervision over their case against Heather M. Gray;
2. **The Florida Supreme Court has authority over the State District Courts and issues per R.O.C.P. 9.900(d)1.a-f and the individuals of this Court should desire to protect their own honor to the voters of this State hereby;**
3. **Florida Constitution:**

Article I. Section:

1;2;3;4;5;6;7;8;9;10;11;12;13;14;15;16;17;18;19;20;21;22;23;24;25;26;

Article II. Section 3; 5;8; Article III; Article IV; Article V. Sections 1;

2;3; 4;5;7;8; 10;11; 12; and

4. **United States Constitution** Article I; Article III and the Ninth and Fourteenth Amendment and 28 USC 1257 (a) and
5. Federal and States versions of Religious Freedoms Acts, “due and equal process” and related laws;
6. **Subject Matter Jurisdiction per 18 USC 1961 (RICO), 18 USC 1346 (fraud and honest services), 18 USC 1951 (interference with commerce), Title 15 of the United States Code pertaining to restraint of trade and monopolies (anti-trust law) and Rule 23, Federal Rules of Civil Procedure (class action) as also proofs of illegal conduct of Florida Bar Agents under the direct Respondent Superior and Vicarious Liability of this Florida Supreme Court.**
7. Per this courts own stated Fiduciary Duty of itself and its agents.

The United States Supreme Court has ruled and told this and any lower court and this and any parent that a parent has the legal right to even as a pro se and violated to address the Supreme Court in a action regarding child custody where defendants here still conspire to “Shoot the Messenger” who

called “9-11!” for himself and these indispensable parties still violated and stripped of their Rights.

F.S. §617 and laws allows a “party of one” to defend for the whole.

This “David (Townsend) v. Goliath Government (Gray ET AL including Popper ET AL) intentionally conceal deputies Jeffers, Howlett, Smoak ET AL. list of estopped defendants by their own criminal admissions” made this a: “Federal Judge Merryday Aisenberg Rule” “John Couey” violation abduction of kids, family and rights; public defamation; “child custody”; interference; and false detainment; religious dispute case ever since the 09/08/1999, “FBCCP Demand Meeting” by the members to the “Bernie Mad-off sect” to “Show me the Money” and “Stop the Building Scheme Frauds” and then the “sects and sect agents” unlawful detainment of the children J.D.T. and J.G.T. from this father by “estopped” defendants continuing uttering false reports and using their deputy uniforms, cars and agents to “impede” and chase Townsend through “public streets”, “church steps” and “courts of justice” and to his children and fellow members since 1993 or before crying “Odious and Outrageous” by these political government suppressors since the intentional Mens Rea betrayal of attorneys and their agents since 1988 by Popper and Chapin ET AL’s Aisenberg Rule “uttering false reports” attacks betraying their client Townsend to not expose

the Mens Rea crimes of themselves and “others”.

The criminal pattern of Chapin and Orange County Chief Judge Rom Powell blocking “discovery” which shows Townsend as a victim of Lane ET AL. since 1988, even of his own “law enforcers” and connects the political conspiracy is still extended to these interested persons for whom Townsend today speaks as the actions through judges and judge Crenshaw “illegally attempting to block discovery and broker a deal to conceal “**Pellegrini co conspirators**” and of judge Cook and of this court if these “justices” deny this claim in any form prove the connection to stop “transparent discovery” and “rights” as required by law.

Constitutional Laws, Statues, Case Law and Rights involved to support each claim of Appellants FEDERAL CASE now offered for this Brief.

Federal Constitution:

Article III - Good Behavior requires “No law shall impede the obligation of a contract” or the Rights stated per these Amendments:

First Amendment; Second; THIRD; Fourth; Fifth “No person shall...be deprived of life, liberty, or property, without due process of law...”; Sixth “In all criminal prosecution, the accused shall enjoy the right...to be informed of the nature and cause of the accusation...and to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense....” SEVENTH; EIGHTH; NINTH; TENTH; ELEVENTH; THIRTEENTH;

Fourteenth in full as the claims of the State Of Florida via these Defendants violate Federally protected Constitutional Rights.

Plaintiff’s also incorporate herein all Cases stated in the FEDERAL Third Amended Complaint (Doc.23) Federal (M.D. NO: 8:06-CV2050T-30-TGW) in whole and with additional blocked discovery as the 11th Circuit

Court of Appeals (case 08:10721A) ruling as proof of jurisdiction and laws violated. **POSTED AT** www.Judgeoneyourself.com.

“Constitution of the State of Florida, Article I, Section 3. Religious Freedom stated: “Religious freedom shall not justify practices inconsistent with public morals, peace and safety.”

Constitution of the State of Florida, Article 1 Section 23: As to the Rights of Parent and Child.

EPPERSON v. MYERS 58 So2d 150, 1952 Fla. SCt 512 (Fla. 1952)

“Florida Statue §775.03 No Benefit of Clergy.

“Florida Statue §775.0845 Wearing mask (or other device) while committing offense; enhanced penalties.” (Defendants fraud to naïve children as impersonating honest clergy, deputies, elected officials, Florida Bar members.)

“Florida Statue §876.01 & §876.02 & §876.03-Criminal Anarchy, Treason, and Other Crimes Against Public Order”

“Florida Statue §876.24 Membership in subversive organization;”

“Florida Statue §876.155 (all) Criminal Anarchy, Treason, ETC.”

“Florida Statue §876.34 Combination to usurp government”

“Florida Statue §877.03 Breach of the Peace; disorderly conduct.”

Jones , 174 F.3d at 1286,

STRENGTH 854 F.2d at 425- “(a prima facie case of conspiracy to violate any right protected by Section 1983 requires demonstration by the plaintiff that the defendant “reached an understanding” to violate the plaintiffs rights.)”

“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.”

OTHER Recent Decisions:

United States Supreme Court 06/2007 decision regarding Guantanamo Bay protection of Rights and the Rule of Law as to who as superior officers did violate rights of detainees.

Texas Cult Case 2007 decision regarding state officials must follow due process before removing children from parents.

PACE v. EVANS 709 F.2d 1428 (1983),

“Pellegrini v. Winter 476 So2d 1366- Quoting

“[6,7] The question, then is whether the dismissed complaint states a cause of action for malicious prosecution against the other three defendants. We believe that it does, inasmuch as the allegations are to the effect that all four defendants collaborated in wrongfully initiating and maintaining the action against Pellegrini.

Halkey-Roberts Cor. Mackal 641 So2d 445, 447 (Fla. 2 DCA 1994),

“Breach of Fiduciary Duty is an intentional Tort.

Palafrugell Holding, Inc. v. Cassel 854 So2d 225 (Fla. 3 DCA 2003) the court said a **“claim for breach of fiduciary duty may arise out of either negligence or intentional conduct.”**

First Union Bank v. Turney 824 So2d 172, 189 (Fla. 1st DCA 2001), **“The mere silence by one under such a fiduciary duty to disclose is fraudulent concealment”**.

Per Morgan Stanley DW Inc. v. Halliday 873 So2d 400, (Fla. 4th DCA 2004)

“Fiduciaries are generally not able to avoid the negligent performance of their own special responsibility by handing them off to someone else.”

32 Fla.Jur.2d Joint and Several Tortfeasors §§ 1,2. Clearly, a cause of action for malicious prosecution will lie for the wrongful initiation of a lunacy petition. **Perez v. Rodriquez** 155 Fla. 501, 20 So2d 654 (1945)”. On 09/08/1999, Jeffers ET AL co-participants started their claims that “Townsend was “dangerous, with guns, suffering from a stress related

breakdown, a liar, an infidel, stalker, repeat violator, domestic violator, abuser, molester” and various other defamation’s.

ROWE 279 F.3d at 1281;

KINGSLAND v. City of Miami 369 F.3d 1201 1223 (11th Cir. 2004)

GJR INVS, INC 132 F.3d 1366

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

West’s F.S.A §61.13(2)(b)1,(3)(a); U.S.C.A. Const.Amend. 1.

1. We have jurisdiction pursuant to article V, section 3(b)(3), Florida Constitution because the decision below expressly construes the first amendment of the United States Constitution.
2. The burden is “incidental” because the state interests which are furthered by the order are “unrelated to the suppression of free expression” United States v. O’Brien 391 U.S. 367, 377, 88 S.Ct. 1673, 1679, 20 L.Ed.2d 672 (1968).

Frazier v. Frazier, 109 Fla. 164, 172, 147 So. 464, 467 (1933) (non custodial father is "entitled to have and enjoy [child’s] society for a reasonably sufficient length of time each year to enable him to inculcate in her mind a spirit of love, affection and respect for her father,” if such is not contrary to best interest of child); see Michael H. v. Gerald D., 491 U.S. 110, 109 S.Ct. 2333, 2342, 105 L.Ed.2d 91 (1989) (parent-child relationship which develops within the unitary family is constitutionally protected); Quilloin v. Walcott, 434 U.S. 246, 254-55, 98 S.Ct. 549, 554,55, 54 L.Ed.2d 511 (1978) (“the relationship between parent and child is constitutionally protected”).

FIRST FREE WILL BAP. CH. OF BLOUNTSTOWN, INC, v.

FRANKLIN, ET AL. 4 So2d 390, 148 Fla. 277,

“The law appears to be settled that in the absence of a showing of fraud, collusion or arbitrariness on the part of the church authorities having jurisdiction of the controversy, the courts will not interfere.”

The pattern of unlawful practices in the Hillsborough County in breach of the County Charter and Florida Constitution.

Hillsborough Sheriff's Department, the Pinellas County Sheriff's Department and State of Florida alleged "Justice System" system has been proved by the Sabrina Aisenberg case (11/24/1999), **Aisenberg v. Hillsborough County Sheriff's Office et al.** 325 F.Supp.2d. 1366 (M.D.Fla.2004) by Judge Merryday and these same connected defendants (Gary Terry) as in this case now showing "unequal due process" when "deputies are gone bad".

Judge Merryday established his **Aisenberg** Order based as stated on: "**ROWE** 279 F.3d at 1281; see also **Jones** , 174 F.3d at 1286, ...A police officer is entitled to qualified immunity when performing discretionary functions unless the officer has violated a clearly established right of which a reasonable police officer would have known."

And by this 11th Cir. Standard set in **Kingsland** 369 F.3d 1210,1223 (11th Cir.2004), stating: "In other words, qualified immunity protects a prosecutor unless the prosecutor's act is so obviously wrong in the light of pre-existing law, the only a plainly incompetent [government agent] or one who was knowingly violating the law would have done such a thing."

Since the conspiracy of Popper began in 1988, each co-participant has known of the fraud and conspiracy Popper started against his Client Townsend leading to the lists of crimes reported by these "persons" who still do not obey the law.

So why is the Divorce Injunction of 2003, still being used per Gray ET AL to keep Townsend from his kids and why have the FBCCP Business Records not been made public as these deputies and pastors in writing in 1997-98, promised and then even the May 10, 2006, Court Order of Judge Crenshaw was violated and refused to be enforced or Defendants not found in "Contempt of Court?" Because these years of litigation proves the conspiracy started by Chapin/Popper is being carried out through this Florida Supreme Court and its Agents by their own hypocrisy to not follow the law.

This gives unlawful benefit to clergy which is a crime in violation of assisting "clergy" and "law enforcers" to act as your Agents in all their criminal enterprise! Even the October 27, 2007, Trespass Warning removing Townsend unlawfully as a "proved Member" from the FBCCP Property was a "reached understanding" to "violate Plaintiffs Constitutional and By-Laws Rights" by known false collusion directly with Deputy Jeffers using and showing his Pinellas County Sheriff Badge on FBCCP Church

Property to HCSO Deputies illegally assisting Jeffers ET AL in the now proved criminal enterprises.

Plaintiff Townsend had exposed the “schism” acts to “schism agents” directly in individual meetings since 9/1999, to Deputies of HCSO District 3 and specifically HCSO Coronal Gary Terry on June 26, 2007, at 1330 hours and personally to Sheriff David Gee on 10/02/2007 and to his 13th Court Judges as stated and to Pinellas County Sheriff’s Internal Affairs since 2000, (to Sgt. Pelella & Sgt. Curry) many times and again on June 27, 2007 and “other” defendants as reported in the Federal Complaint 977 pages per the directive of Federal Judge James Moody Jr. to “be specific against each defendant” of facts of acts not “conclusory allegations” to meet the Judge Merryday unreasonable standard of tolerance of deputy abuse and harassment in violation of his “discretionary review” and the 1st, 2nd, 4th, 5th, and 14th and “other” Constitutional Amendments. All this was done yet Judges in Circuit cases unlawfully dismissed these lower cases and the Trespass Warning of October 27, 2007, was issued and the Divorce Injunction of 2003, is being enforced per the visit of HCSO Deputies warnings and threats in 03/2010, still which violates this Plaintiff Townsend keeping him from his fellow Plaintiffs and Discovery of their rightful FBCCP and CPCS records and property and even their children needing proper medical care. HCSO in their investigation and reports regarding the improper conduct of the Sarasota Police Department and Chief Abbot confirms they acknowledge their own acts, threats and extortion since about 1999, are unlawful.

This case exposed the patterns of Breach of Trust by all defendants and their violations against Tax payers who they alleged per their “Oath” to serve.

“SCHULTZ v. SCHULTZ 581 So2d 1290 (Fla. 1991)—Supreme Court of Florida May 16, 1991

“1. Parent and Child 2(17)-

Custodial parent has affirmative obligation to encourage and nurture relationship between child and non-custodial parent; such duty is owed to both non-custodial parent and child and obligation may be met by encouraging child to interact with non-custodial parent, taking good faith measures to ensure that child visit and otherwise have frequent and continuing contact with noncustodial

parent, and refraining from doing anything likely to undermine relationship naturally fostered by such interaction.

2. Constitutional Law 90.1(1), Divorce 302

Trial court order requiring former wife, who had been granted custody of children, to do everything in her power to create in children a loving, caring feeling toward former husband and to convince them that it was her desire that they see former husband and love him did not impermissibly burden former wife's First Amendment rights, and was not an abuse of discretion; there was not requirement that former wife express opinions that she did not hold. West's F.S.A §61.13(2)(b)1,(3)(a); U.S.C.A. Const.Amend. 1.

- 3. We have jurisdiction pursuant to article V, section 3(b)(3), Florida Constitution because the decision below expressly construes the first amendment of the United States Constitution.**
- 4. The burden is "incidental" because the state interests which are furthered by the order are "unrelated to the suppression of free expression" United States v. O'Brien 391 U.S. 367, 377, 88 S.Ct. 1673, 1679, 20 L.Ed.2d 672 (1968).**
- 5. Frazier v. Frazier, 109 Fla. 164, 172, 147 So. 464, 467 (1933) (non custodial father is "entitled to have and enjoy [child's] society for a reasonably sufficient length of time each year to enable him to inculcate in her mind a spirit of love, affection and respect for her father," if such is not contrary to best interest of child); see Michael H. v. Gerald D., 491 U.S. 110, 109 S.Ct. 2333, 2342, 105 L.Ed.2d 91 (1989) (parent-child relationship which develops within the unitary family is constitutionally protected); Quilloin v. Walcott, 434 U.S. 246, 254-55, 98 S.Ct. 549, 554,55, 54 L.Ed.2d 511 (1978) ("the relationship between parent and child is constitutionally protected").**

Page 1292- "After a final hearing on the motions, the trial court found that 'the cause of the blind, brainwashed, bigoted belligerence of the children toward the father grew from the soil nurtured, watered and tilled by the mother'. The court further found that 'the mother breached every duty she owed as the custodial parent to the un-custodial parent of instilling love, respect and feeling in the children for their father.' The trial court's findings are supported by substantial competent evidence.

Based on these findings, the trial court ordered the mother “to do everything in her power to create in the minds [of the children] a loving, caring feeling toward the father...[and] to convince the children that it is the mother’s desire that they see their father and love their father.”

The now proved under color of law falsehoods starting from Deputy Jeffers (impeding FBCCP RIGHTS) and Attorney Popper (impeding Townsends SABAL Contract RIGHTS) and brainwashing against Townsend can be summed up as stated per Justice Jackson in: COHEN v. BENEFICIAL INDUSTRIAL LOAN CORPORATION 337 U.S. 541, 548 69 S.Ct. 1221, 1226, 93 L.Ed. 1528, 1537 (1948) :
“A shareholder who initiates a shareholder’s derivative action, however, is, as ...a ‘self-chosen representative and a volunteer champion’ of the corporation and, as such, acts as a fiduciary in asserting the corporation’s interests. The corporation is thus dependant upon his ‘diligence, wisdom and integrity.’”

As this is the purpose of this shareholder’s derivative action NOW OF AND FOR THE FIRST BAPTIST CHURCH OF CITRUS PARK BY-LAWS AND THE CHILDREN MEMBERS and HIS OWN CHILDREN of the Corporation (as Majority) SINCE 1994, OR BEFORE WITHIN PLAINTIFF RANDALL TOWNSEND’S (TOWNSEND) DUTIFUL ELECTED SERVICE AND STATES TO ALL PERSONS AN AGENCIES AND OTHERS AS STATED AND ACKNOWLEDGED BY RON BECK IN ILLEGAL CONSPIRACY WITH HIS SCHISM “MASKED” AS SHERIFF DEPUTIES AND OTHERS WHO IN WRITTEN RESPONSE ON SEPTEMBER 13, 1999, WROTE:

“It hurts when a church member you think you have a decent relationship with tells other brothers that he thinks the Pastor needs to resign because he isn’t the man of God for this church....
The ministry decisions made have been and will continue to be made with a total ministry view.”

And this letter from Ron Beck(Beck) was follow up of Beck with Beck’s “Schisms” on August 11, 1999, starting their “scheme” for Plaintiff Townsend to “RESIGN” and be “Removed” of all duties and “Rights” even as an “honorable father” because this elected Leader/Father, now as Plaintiffs confronted self-serving clergy/officers/employees as an

unlawful “schism” with lists of misconduct as violations of the First Baptist Church of Citrus Park Corporation (FBCCP) BY-LAWS(1993), of State, Federal and IRS Laws and Rights and Plaintiff Townsend still confronts or acts “dutifully” per Judge Jackson as for:

“Equity came to the relief of the stockholder, who had no standing to bring civil action at law against faithless directors and managers. Equity, however, allowed him to step into the corporation’s shoes and to seek in its right the restitution he could not demand on his own. It required him first to demand that the corporation vindicate its own rights but when, as was usual, those who perpetrated the wrongs also were able to obstruct any remedy, equity would hear and adjudge the corporation’s cause through its stockholders with the corporation as a defendant, albeit a rather nominal one. This remedy born of stockholder helplessness was long the chief regulator of corporate management and has afforded no small incentive to avoid at least grosser forms of betrayal of stockholders’ interests. It is argued, and not without reason, that without it there would be little practical check on such abuse.”

per the “CONTRACT” of the FBCCP Corporation BY-LAWS and Rules of Law and the United States Constitution and the State of Florida Constitutional Right that “NO LAW SHALL IMPEDE THE OBLIGATION OF A CONTRACT” and made/makes allegations of knowingly, intentionally, negligently and willfully “reckless” participation and “unequal protection” and violations of law of the “masked” “schism” and those Contracted with as agents by/of the “Schism” using against these Majority General Voting Members, fraud, extortion, kidnapping and other torts in VIOLATIONS of:

A. Rights of this Father and his Plaintiff daughter, minor J.G.T.at age

14 writing on 10/20/1999 the night of their unlawful abduction letter;

OR FROM SON, J.D.T, then away at Bible college trying to “reconnect”

With his always innocent father mailed this letter on October 20, 2001 as:

“Hey Dad,
I just thought I’d send a little note since I haven’t talked to you in a while. I sent a letter last week but it was returned to me in the mail.

I'm trying your P.O. Box now. Hopefully it will get through. I'm slightly modifying the same letter as last week, just updating it a little. Anyway, I've been pretty busy lately. I have classes until 1 on Tuesday through Friday and then I go to work at 3 and work until about 7:30 on every day but Friday and Wednesday. Then I have study hours until 9:15 with lights out at 10:30. Wednesday I have ministry which started this week (I'm going to help out at Rhonda's church), and on Friday I have PE (my only partly free day in which I work on homework or do laundry or go shopping etc). I'm basically getting all my work done and I haven't gotten behind so far really (I do have a paper due next week for Bible Survey, but I've still got time.) I just don't have a lot of free time. Let's see, there hasn't been much going on up here other than that. I tried calling State Farm several times but never got through. I don't know what to do about that. I'm not even sure if I have the info you gave me any more. Umm... let's see....I got pretty much everything I need. My car stopped starting for a while. It got worse and worse until it didn't start. I got it jumped and it was fine for another day until it went dead again. I couldn't even jump it after that. I replaced the battery and it works fine. Hopefully it stays that way. There really isn't a whole lot I needed to say; I just wanted to send a little note. Say hi to Grammy and Poppy for me. How's his leg doing? Well, if you want, you can write me back or we have an answering machine now. Ext. 4650. It's easier for me to write than call because there are times restrictions on phone use during study hours and after which are my only free times really (and it 13 cents a minute, but it goes on the bill...I haven't used it so don't worry about the bill, but I assume you wouldn't mind if I called you if I had time). Well, contrary to what I said earlier about my schedule, I really am enjoying it here. We just finished a study of Matthew by Dr. Paul Enns who I believe is associated with Idlewild somehow. He definitely knows what he's talking about. I think I took more notes in that 2 week class than I did in all my other classes since kindergarten. It kind of surprised me. Now we're studying I Corinthians. I've been enjoying that too. Anyway, I've got to go to work. Talk to you later.

Love, Jason"

Appellants make a claim against each individual as Defendant herein per 28 U.S.C.A §§1331, 1343(3) and 42 U.S.C.A § 1983, "which provides that any person who, under apparent authority of state law, deprives another of any

rights, privileges, or immunities secured by the United States Constitution and the laws will be liable to the party injured. [42 U.S.C.S. §1983], and (E) to restore and “EQUALLY” Protect Federal and State Granted RIGHTS OF “equal protection” under the Laws of “Contracts” as the Contracts (1) of the United States Constitution, (2) the State of Florida Constitution (3) the FBCCP BY-LAWS, CONSTITUTION, POLICIES of 1993 as a Contract (4) Lawyer/Client Contract, (5) Insurance Contracts and (6) Employment Contracts and (7) Rules Of Law as Contracts, have been not “equally protecting” and “rights” have been denied these Plaintiffs by these self serving Defendants with malicious tort actions and Breach of these Contracts, Breach of Trust, Fraudulent Misrepresentation of Fact, “non confrontation” of the “masked clergy and trustees as sheriff deputies Howlett and Jeffers” and then claims of “no jurisdiction” of these Courts or State Agencies thus denying “equal protection” against the collusive acts of the same agents” Howlett and Jeffers as by attorneys, agencies or Circuit Courts during 1999 through present times by intentional actions of fraud denying jurisdiction and delay, to continue the acts of “masked” sheriff deputies allegedly acting as “Trustee” Contract Enforcers but instead each practiced “omission of truthful disclosure” since on or about 1996, these Trustees to self serve their own gain outside the Rules of Law, Constitutions, and §617, Florida Statutes have knowingly, willfully, negligently and recklessly allowed Plaintiffs to be violated of First Amendment, Fourth Amendment and Fourteenth Amendment RIGHTS and gave “masked” “Unlawful benefit to clergy” in violation of §775.03 Florida Statutes and jointly with attorneys, judges and state agents and agencies did, do and continue **no** “remedies of law” now since 1999, blocking relief and continuing damages to these Plaintiffs and Defendants still do and allow all “masked” agents since September 8, 1999, to divest this Plaintiff Townsend from his Constitutional Rights to FREELY WITHOUT FEAR OF UNLAWFUL ARREST by fraudulent charges of Deputies Howlett or Jeffers or others or by the fraudulently gained Court Orders/Injunctions of Judges Palomino, Timmerman or others blocking this Parent Townsend from Parenting or See his children, and or to Practice his Free Speech, Practice his Religion, Practice Civil Activities on Public Property, Practice Gainful or any “gainful” or “free” “choice” employment, PRACTICE and PROTECT his and all these Children Plaintiffs named herein Life, Liberty and Pursuit of Happiness as to protect the rights of all Plaintiffs herein as these agents and attorneys and judges in violation of their own stated Rules of Law, Court **Orders** and Court Time lines continue “without end in sight” as remedy of law, or give Plaintiff’s a “Conspiracy free” “day in court” but

all Defendants continue to conspire with personal malicious motives as shown herein doing violations of TITLE 18, United States Code, which states:

CHAPTER 13,

“SECTION 241. Conspiracy against rights.”

“If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; or

If two or more persons go in disguise on the highway, or on the premises of another, with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured- They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, ...they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.”

“SECTION 242. Deprivation of rights under color of law.”

“Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.”

“SECTION 245. Federally protected activities.” Stated herein in full.

“SECTION 246. Deprivation of relief benefits.”

“Whoever directly or indirectly deprives, attempts to deprive, or threatens to deprive any person of any employment, position, work, compensation, or other benefit provided for or made possible in whole or in part by any Act of Congress appropriating funds for work relief or relief purposes, on account of political affiliation, race, color, sex, religion, or national origin, shall be fined under this title, or imprisoned not more than one year or both.”

“SECTION 247. Damage to religious property; obstruction of persons in the free exercise of religious beliefs.”

“(a) Whoever, in any of the circumstances referred to in subsection (b) of this section- (2) intentionally obstructs, by force or threat of force, any person in the enjoyment of that person’s free exercise of religious beliefs, or attempts to do so; shall be punished as provided in subsection (d).”

CHAPTER 19,

“Section 317. Conspiracy to commit offense or to defraud United States”

“If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.”

“SECTION 373. Solicitation to commit a crime of violence.”

(a) Whoever, with intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, solicits, commands, induces, or otherwise endeavors to persuade such other person to engage in such conduct, shall be imprisoned... or fined...; or if the crime solicited is punishable by life imprisonment or death, shall be imprisoned for not more than twenty years.

(b) It is not a defense to a prosecution under this section that the person solicited could not be convicted of the crime because he lacked the state of mind required for its commission, because he was incompetent or irresponsible, or because he is immune from prosecution or is not subject to prosecution.

“ 42 U.S.C.A §1983 PUBLIC HEALTH AND WELFARE,
CHAPTER 21”, SECTIONS:

“1415. Perjury, deprivation of constitutional or statutory rights generally- Generally

Where plaintiff prevailed in state tort action, and there was no indication that he was damaged by allegedly perjurious testimony given by defendants in trial of such action, such alleged perjury was not actionable. *Landrigan v. City of Warwick*, C.A.1 (R.I.) 1980, 628 F.2d 736.”

“§1431. Police officers violated plaintiff’s rights under U.S.C.A Const. Amend. 14 by their false accusations and testimony regarding plaintiff’s possession of a concealed gun. *Spears v. Conlisk*, N.D. Ill. 1997, 440 F. Supp. 490.”

“1422. Probation, sentence and punishment, deprivation of constitutional or statutory rights generally. Grandfather’s claim that the state of Indiana, by virtue of the conditions of probation it imposed on his daughter-in law, deprived him of his constitutionally protected interest in the nurturing and development of his grandchild was actionable under this subchapter. *Drollinger v. Milligan*, C.A.7 (Ind.) 1997, 552 F. 2d 1220.”

“§1431. **State created danger, deprivation of constitutional or statutory rights.** State social worker’s alleged failure to investigate numerous bruises on child and allegations that father abused child, together with social worker’s recommendation to court that father assume legal custody, were sufficient to state §1983 due process claim based on state-created danger theory. *Currier v Doran*, C.A. 10 (N.M.) 2001, 242 F.3rd 905, certiorari denied 122 S.Ct. 543, 151 L.Ed.2d 421.”

“ §1431. **State created danger, deprivation of constitutional or statutory rights generally.** Under “state-created danger” theory, constitutional violation might occur if the state creates danger that deprives individual of Fourteenth Amendment rights, where harm ultimately caused was foreseeable and fairly direct, state actor acted in willful disregard for plaintiff’s safety, there existed some relationship between the state and plaintiff, and state actors used their authority to create opportunity that otherwise would not have existed for third party’s crime to occur. *Hodgson v Mississippi Dept of Corrections*, E.D. Wis. 1997, 963 F. Supp. 776.”

“§1432. Special relationship, deprivation of constitutional or

statutory rights generally. State has “special relationship,” giving rise to §1983 civil rights liability for actions of third parties, when state had directly prevented plaintiff from taking action to protect him or herself. *Elliott v. New Miami Bd. Of Education.*, S.D.Ohio 1992, 799 F.Supp. 818”

“§1434. **Assault and battery, deprivation of constitutional or statutory rights generally.** Malicious infliction of bodily injury constitutes deprivation of a property interest with due process for purposes of this section. *Howell v. Tanner*, C.A.5(Ga.) 1891, 650 F.2d 610, rehearing denied 659 F. 2d 1079, certiorari denied 102 S.Ct. 1775, 456 U.S. 918, 72 L.Ed.2d 178, certiorari denied 102 S.Ct. 1777, 456 U.S. 919, 72 L.Ed. 2d 180.”

“§1434. Degree of force exerted and extent of physical injury inflicted that together amount to a constitutional deprivation warranting relief under this section must be determined by the facts of the given case. *Shillingford v Holmes*, C.A.5 (La.) 1981, 634 F.2d 263, on remand 512 F.Supp. 656.”

“§1434. Person who was subjected to an assault and battery by person acting under color of state law can have a claim for relief under this section.

Meredith v. State of Ariz., C.A.9 (Ariz.) 1975, 523 F.2d 481.”

“§1438. **Emotional distress, deprivation of constitutional or statutory rights generally.** Mental and emotional distress caused by denial of procedural due process itself is compensable under this section, but neither the likelihood of such injury nor the difficulty of proving it is so great as to justify awarding compensatory damages without proof that such injury actually was caused. *Carey v Pipus*, U.S. Ill 1978, 98 S.Ct. 1042, 435 U.S. 247, 55 L.Ed. 2d 252.”

“§1438. For plaintiff to recover for nonphysical injury under §1983, there is no requirement that defendant’s conduct be outrageous or that plaintiff’s injury be extreme. *Chatman v. Slagle*, C.A.6 (Ohio) 1997, 107 F.3d 380.”

“1438. Count stating claim for intentional infliction of emotional distress was not a claim cognizable under this section but was merely common law cause of action recognized by Michigan law. *Stern v. New Haven Community Schools*, E.D. Mich. 1981, 529 F. Supp. 31.”

“1438. Mental distress caused by a denial of procedural due process is compensable under this section; the injury may be purely mental or emotional- concurrent physical injury need not occur. *James v*

Board of School Com'rs of Mobile County, Ala., S.D. Ala. 1979, 484 F. Supp. 705.”

“1440. **Loss of consortium, deprivation of constitutional or statutory rights generally.** Ex parte temporary restraining order that required husband to avoid his home and children for seven days deprived him of property and liberty without due process, where wife’s petition contained no allegation of a risk of immediate harm, but only alleged that husband had assaulted her two weeks earlier and there had been previous assaults. *Blazel v. Bradley*, W.D. Wis. 1988, 698 F. Supp. 756.”

NO CLAIM BY ANY CO-PARTICIPANT THAT RANDALL TOWNSEND WAS “DANGEROUS” OR HAD DONE A CRIME HAS EVER HAD MERIT OR WAS NOTHING BUT A CREATED FRAUD OF CO-PARTICIPANTS TO DISTRACT FROM THEIR CRIMINAL ENTERPRISE. Emphasis Added.

“1453. **Maintenance of family, custody of children, deprivation of constitutional or statutory rights generally.** County probation officer and county deputy sheriff who forcibly removed minor child from his parents’ home due to unspecified allegations of child neglect were subject to individual liability for Fourth Amendment violations in child’s §1983 action brought after he achieved age of majority. Allegations that state social worker directed county employees to forcibly remove minor child from his parents’ home were sufficient to subject social worker to individual liability for Fourth Amendment violations in child’s §1983 action brought after he achieved the age of majority. *Brokaw v. Mercer County*, C.A.7 (Ill.) 2000, 235 F.3d 1000.”

§1454. **Notice and hearing, custody of children, deprivation of constitutional or statutory rights generally.** The “liberty” protected by due process clause of U.S.C.A. Const. Amend. 14 includes right to custody of one’s minor children, and it would be deprivation of such “liberty” without due process of law for persons acting under the color of state law permanently to separate children from their parents without notice and hearing. *Ellis v. Hamilton*, C.A.7 (Ind.) 1982, 669

F. 2d 510, certiorari denied 103 S.Ct. 488, 459 U.S. 1069, 74 L.Ed 2d 631.”

“§1454. Complaint alleging that guardian ad litem appointed for child was involved in improperly depriving parents of custody of their child without a hearing stated a cause of action under this section. *Roe v. Borup*, E.D. Wis 19809, 500 F. Supp. 127.”

And per 42 U.S.C.A CIVIL RIGHTS §1981 CHAPTER 21, NOTES: 341- **‘Employment contracts generally.** “This section, protecting all persons, white and nonwhite, from racially motivated deprivations of certain enumerated rights, whether committed under color of state law or by private individuals, operates to protect rights of individuals to be free from racial discrimination in employment. *Robertson v. Maryland State Dept. Of Personnel*, D.C.Md. 1978, 481 F. Supp. 108.”

354- **“—Burden of proof, disparate treatment, employment contracts generally.”** “Initial burden in a disparate treatment in employment case is upon employee to establish prima facie case of racial discrimination; once that is accomplished, employer is obligated to come forward with a legitimate, nondiscriminatory reason for its action, and then employee is given final opportunity to make out case by establishing that stated reason is pretextual. *Johnson v. Jos. Schlitz Brewing Co.*, M.D.N.C. 1984, 581 F.Supp. 338, affirmed 765 F. 2d 138.”

416-“Retaliation, employment contracts generally.” “ Even if employee was not demoted, terminated, reassigned, or suspended, and did not lose any compensation or privileges, employer subjected employee to adverse employment action sufficient to support retaliation claim under §1981 and Title VII, by reducing his duties, requiring him to undergo remedial training, giving employee much lower performance evaluations, and papering his personnel file with negative reports, including two written reprimands. *Kim v. Nash Finch Co.*, C.A.8 (Iowa) 1997, 123 F. 3d 1046.”

“To prove a claim of retaliation for the filing of a racial discrimination claim against an employer, plaintiff must show that he engaged in activity protected by this section, that an adverse employment action followed, and that there was a casual connection between the two. *Goff v. Continental Oil Co.*, C.A.5 (Tex.) 1982, 678 F. 2d.593, on remand”

“Complaint filed by employee sufficiently alleged causes of action under this subchapter for alleged denial of equal employment opportunity because of employee’s involvement in equal employment opportunity investigations. *Ragheb v. Blue Cross and Blue Shield of Michigan*, E.D.Mich. 1979, 467 F. Supp. 94.”

494.—“Determining factor, discharge of employee.”

“In racial discrimination context, plaintiff does not have to show that discrimination was sole cause for discharge; it is sufficient to show that discrimination made difference between retention and discharge; either the “determining factor” or the “but for” language is sufficient to convey this burden. *Mitchell v. Keith*, C.A. 9 (Cal.) 1985, 752 F. 2d 385, certiorari denied 1-5 S.Ct. 3502, 472 U.S. 1028, 87 L. Ed 2d 633.”

and per the United States Constitution and the State Of Florida Constitution

2132.—“Chilling effect, harassment, police activities.

“Genuine issue of material fact, precluded entry of summary judgement for police officer in civil rights action, existed as to whether police officer’s warnings to gas station proprietor about speaking to press actually had chilling effect on proprietor’s protected activity, even though proprietor participated in approximately 30 media interviews without rejecting any interview requests subsequent to meeting with police officer, where proprietor claim that because of police officer’s threats he no longer made comments to media concerning conduct of police. *Bennett v. Village of Oak Park*, N.D. Ill. 1990, 748 F. Supp. 1329.”

2136.—“Inaction, police activities—Generally.”

“A law enforcement officer can be liable under this section when by his inaction he fails to perform a statutorily imposed duty to enforce the laws equally and fairly, and thereby denies equal protection to persons legitimately exercising rights guaranteed them under state or federal law, and state officials are not entitled to rely on community hostility as an excuse not to protect, by inaction or affirmative conduct, the exercise of fundamental rights. *Smith v. Ross*, C.A.6 (Ohio) 1973, 482 F. 2d 33.”

“Law enforcement officer has duty to intercede on behalf of citizen whose constitutional rights are being violated in officer’s presence, and officer who does not intercede on behalf of citizen in such situation can be liable to that citizen under §1983. *Jonelis v. Russo*, D.Conn. 1994, 863 F. Supp. 84.”

2137—“Conspiracy, inaction, police activities.”

“Acquiescence can amount to §1983 conspiracy agreement when one police officer watches open breach of law by other officers and does not seek its prevention. Hafner v. Brown, C.A. 4 (Md.) 1992, 983 F. 2d 570.

2140—“Discrimination, inaction, police activities.”

“If police officers knew that member of religious group had been abducted by his parents and held for deprogramming, but failed to take any action because of their opinion of that particular church, their action would violate member’s civil rights” Cooper v. Molko, N.D. Cal. 1981, 512 F. Supp. 563.”

2143—“Domestic violence, inaction, police activities.”

“A protective order issued to prevent relative or household member from abusing other family members creates property right that incurs duty on part of government irrespective of whether the right is created by judicial function at statutory behest of the state legislature, and government has a duty to protect beneficiary of such order, and failure to perform the duty may constitute denial of right to procedural due process. Siddle v. City of Cambridge, Ohio, S.D. Ohio 1991, 761 F. Supp. 503.”

2145.—“Other officers committing violation, inaction, police activities”

“Police officer has affirmative duty to intercede on behalf of citizen who constitutional rights are being violated in his presence by other officers and failure to intercede to prevent unlawful arrest can be grounds for §1983 liability. Ricciuti v. N.Y.C. Transit Authority, C.A.2 (N.Y.) 1997, 124 F.3d 123, on remand 70 F. Supp. 2d 300, reargument denied.”

“One who is given the badge of authority of a police officer may not ignore the duty imposed by his office and fail to stop other officers who simmarily punish a third person in his presence or otherwise within his knowledge; such responsibility obtains when the nonfeasor is a supervisory officer to who direction misfeasor officers are committed; like wise, the same responsibility must exist as to nonsupervisory officers who are present at scene. Byrd v. Brishke, C.A.7 (Ill.) 1972, 466 F. 2d 6.”

AND PER 28 U.S.C. § 1343(3),

“Civil rights and elective franchise

**(a) The district courts shall have original jurisdiction of any civil action authorized by law to be commenced by any person:
(3) To redress the deprivation, under color of any State Law, statue, ordinance, regulation, custom or usage, of any right, privilege or immunity secured by any Act of Constitution of the United States or by any Act of Congress providing for equal rights of citizens or of all persons within the jurisdiction of the United States....”**

AND STATING PER THE UNITED STATES AND FLORIDA CONSTITUTIONS, “**NO LAW SHALL IMPEDE THE OBLIGATION OF A CONTRACT**” and sues each individual and or person, agent, agency, State of Florida Government Public Entity, County, City, Judge, Attorney, Court Officer and or each Corporation as stated herein, pursuant to the Civil Rights Act of 1871, and as § 1983 and of Florida Statues 768.28(6), and Florida Statues 760 as the HUMAN RIGHTS ACT OF 1977.

2. This Court has personal jurisdiction over this litigation per the Constitution of the United States and The State Of Florida Constitution, harmoniously in whole and in part Protecting, “**NO LAW SHALL IMPEDE THE OBLIGATION OF A CONTRACT**” or Impede Constitutional and Civil Rights to “Life, Liberty and Pursuit of Happiness” and protection of “Separation of Church and State” and thereby the “unlawful unequal tort” conduct per the of “masked Rambo cops (Howlett, Jeffers) as unlawful Deputies and non elected per the By-Laws Trustees” with the Sheriffs and his agents, concealing an alleged “Clergy”, to interfere, batter, Abuse Process, impede and promote a Malicious prosecution, fraud, omit truthful disclosure, divest the FBCCP Corporation, Plaintiffs and the vested By-Law Rights of all votes after truthful disclosure of and by all of the “General Voting Members (GMV) of Corporate Opportunity and Rights and concealment of the same unlawful acts of themselves and alleged “clergy” in violation to §775.03 Florida Statues “Unlawful benefit to clergy” and of “clergy” and those persons hired by the “Unlawful Schism Officers of FBCCP” as C.P.A’s, Attorneys, Church Planners, Architects, Deputies and those of Courts, Law Enforcement and State Agents and Agencies and Governments (persons) to by Howlett and Jeffers “masked” to “interfere or impede” Rights and Contracts and these same and even the Federal Bureau of Investigation may then claim “out of hand” by these laws or those of

Law Enforcement to protect Rights and thereby show “Odious and Outrageous” “Unequal Protection and Impeding” and doing “Unconstitutional” prejudicial interference acts depriving Plaintiffs and all potential “others” of Finances, Opportunity, and Property and Rights thereby:

A. Per the United States Supreme Court and Florida Rules of Court, State and Federal and that of the Cause of the Federal Policy stated in Various Sections in Chapters 7, 12,13, 19, 21, 31, 41, 43,47, 65, 73, 79, 93, 96,110, 110A, 123, of the UNITED STATES CODE and per ALL FEDERAL HUMAN RIGHTS ACTS and HATE CRIMES ACTS as per Title VII of the Civil Rights Act of 1964, §§ 704(a) and 706 (f) and 706(g), and 42 U.S.C.A.

§2000e-3(a) and §5(f) and 42 U.S.C.A §2000e-5(g) and per Florida Statues

760.10.as expressed and protected in **MONELL v. Dept of Social Services of the City of NY et al** No 75-1914, 436 U.S. 658, 56 L.Ed 2d 611, 98 Supreme Court Reporter reporting of the Sherman Act stating:

“Any person or persons having knowledge [that a conspiracy to violate civil rights was afoot], and having power to prevent or aid in preventing the same, who did not attempt to stop the same, liable to any person injured by the conspiracy”

as the Civil Rights Act of 1871 now as 42 U.S.C.A §1983 to protect per the

“*Coryell*” defined acts of the “masked” per the adoption of all Governments

alleging “trust” to dutifully/equally protect Contract and Civil Rights §13.7:

“Local governments may be sued for constitutional deprivations visited pursuant to governmental customs even though such a custom has not received formal approval through the body’s official decision-making channels.” Further, “Local governing bodies (and local officials sued in their official capacities) can, therefore be sued directly under §1983 for monetary, declaratory, and injunctive relief in those situations where, as here, the action that is alleged to be unconstitutional implements or executes a policy statement, ordinance, regulations, or decision officially adopted or promulgated by those whose edicts or acts may fairly be said to represent official policy. Pg 2035-2036.”

and the 28 U.S.C.A. §1343:

“Civil rights and elective franchise. (a) The district courts shall have original jurisdiction of any civil action authorized by law to be commenced by and person.

(3) To redress the deprivation, under color of any State law, statute, ordinance, regulation, custom or usage, of any right, privilege or immunity secured by the Constitution of the United States or by any Act of Congress providing for equal rights of citizens or of all persons within the jurisdiction of the United States”

B. Per Rules of Civil/Criminal Procedure in these cases applying the FLORIDA TORT CLAIMS ACT AS UNDER TITLE 18, United States Code, which states:

CHAPTER 13,

“SECTION 241. Conspiracy against rights.”

“If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; or If two or more persons go in disguise on the highway, or on the premises of another, with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured- They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, ...they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.”

“SECTION 242. Deprivation of rights under color of law.”

“Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than

one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.”

“SECTION 245. Federally protected activities.” Stated herein in full.

“SECTION 246. Deprivation of relief benefits.”

“Whoever directly or indirectly deprives, attempts to deprive, or threatens to deprive any person of any employment, position, work, compensation, or other benefit provided for or made possible in whole or in part by any Act of Congress appropriating funds for work relief or relief purposes, on account of political affiliation, race, color, sex, religion, or national origin, shall be fined under this title, or imprisoned not more than one year or both.”

“SECTION 247. Damage to religious property; obstruction of persons in the free exercise of religious beliefs.”

“(a) Whoever, in any of the circumstances referred to in subsection (b) of this section- (2) intentionally obstructs, by force or threat of force, any person in the enjoyment of that person’s free exercise of religious beliefs, or attempts to do so; shall be punished as provided in subsection (d).”

CHAPTER 19,

“Section 317. Conspiracy to commit offense or to defraud United States”

“If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.”

“SECTION 373. Solicitation to commit a crime of violence.”

- (c) Whoever, with intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, solicits, commands, induces, or otherwise endeavors to persuade such other person to engage in such conduct, shall be imprisoned... or fined...; or if the crime solicited is punishable by life imprisonment or death, shall be imprisoned for not more than twenty years.
- (d) It is not a defense to a prosecution under this section that the person solicited could not be convicted of the crime because he lacked the state of mind required for its commission, because he was incompetent or irresponsible, or because he is immune from prosecution or is not subject to prosecution.
- C. Per “**Administrative Law and Procedure §413**, When the meaning of an agencies regulation is not clear, deference should be given to the interpretation adopted by the agency that promulgated the regulation and administers the statute.”

In this case each person, agent and agency of the State and County is excluded by self-inflicted individual personal prejudicial motives as reported or yet to be exposed by “impeded” discovery.

- D. Per the Uniform Expert Testimony Act.
- E. Per 28 U.S.C. 1331 because it arises from a contract to which the federal Environmental Protection Agency is a party and contracts with the federal government are governed by federal law. (18105 N Gunn Highway, Site)
- F. This Court has personal and subject matter jurisdiction per **U.S. v. Simon** C.A. 2 (N.Y.) 1969, 425 F.2d 796, certiorari denied 90 SCt.1325, per “Accountant who finds that corporate affairs are not being honestly conducted, at least if he finds diversions so large as to imperil or destroy very solvency or enterprise, just make full

disclosure or make sure the wrong has been righted and procedures established to avoid repetition.”

- G. **Hagans v. Lavine** 415 U.S. 528, 94 S.Ct. 1372, 39 L.Ed.2d 577 (1974) stating:
“Because the equal protection argument could not be rejected out of hand, the court had jurisdiction and, in accordance with established precedent, proceeded properly to the constitutional claim.”
- H. **United Mine Workers of America v. Gibbs,** 383 U.S. 715, 86 S.Ct. 1130, 16 L.Ed2d218 (1966) stating:
“When federal courts have jurisdiction over a claim, they may, in their discretion, hear other claims arising out of the same “nucleus of operative fact” even through they would not ordinarily have jurisdiction over those claims.”
- I. This Court has personal and subject matter jurisdiction per §501 F.S. **DECEPTIVE AND UNFAIR TRADE PRACTICES** stating:
“§501.203 Definitions:
(1) “Consumer transaction” means a sale, ...a consumer service, or an intangible to an individual for purposes that are primarily personal, family, or household or that relate to a business opportunity that requires both his expenditure of money or property or his personal services on a continuing basis and in which he has not been previously engaged, or a solicitation by a supplier with respect to any of these dispositions.”
“(9) Consumer means an individual; child, by and through its parents or legal guardian; firm; association; joint adventure; partnership; estate; or trust; syndicate; fiduciary; corporation or any other group or combination.”
§501.204 Unlawful acts and practices
(1) Unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful.
(2) It is the intent of the Legislature that, in constructing subsection (1), due to consideration and great weight shall be given to the interpretations of the Federal Trade Commission

and the federal courts relating to s. 5(a)(1), of the Federal Trade Commission Act, 15 U.S.C. 45(a)(1)..."

§501.205 **Rulemaking power.---**

- (1) The department shall propose rules to the Governor and Cabinet which prohibit with specificity acts or practices that violate this part and which prescribe procedural rules for the administration of this part....
- (2) All substantive rules promulgated under this part shall be consistent with the rules, regulations, and decisions of the Federal Trade Commission and the federal courts in interpreting the provisions of s.5(a)(1) of the Federal Trade Commission Act, 15 U.S.C. 45(a)(1)..."

J. This Court has personal and subject matter jurisdiction as Townsend as this **Respondent** is being barred from his By-Law, GMV, Contract, Due Process and Civil Rights and Family Protective Rights, and by frauds of Registered Agent Attorney Grant (1997-current) and Scruggs from July 2000, (Denny 2002-current) and in fraud and collusion with Judge Palomino for cases 01-15813 and 01-15814 and 02-4974 and as of September 30, 2003, a respondent pro se having been and still beguiled and impeded by §26.49, F.S., as Sheriff is "responsible" as "Executive Officer of the Courts" and of Deputies Howlett, Jeffers and the HCSO, Attorneys and Judges and others fraudulent unlawful prejudiced unequal actions are in Violation of Plaintiffs and the Defendants as individuals, the State, Agents, Agencies, County, Courts and Law Enforcement "Claims violations apply to their jurisdiction" as a "mask" to Fraud and conceal exposure of past and current violations by the same and thus this Federal Court has, as does all citizens, attorneys and Judges, A duty protect the integrity of the Court and Judgements of the Court and the Constitutions and Victims Rights Per 46 Am Jur 2d Stating:

§17. Constitutional guaranties--The limitations inherent in the requirements of due process and equal protection of the law extend to judicial, as well as political branches of the government, so that a judgement may not be rendered in violation of those constitutional limitations and guaranties. Hence, the validity of a judgment may be affected by the failure to give constitutionally required due notice and opportunity to be heard."

§18. Opportunity to be heard.—It is a fundamental doctrine of the law that a party to be affected by a personal judgement must have a day in court or opportunity to be heard. In this connection, it is sometimes declared broadly that every man is entitled to an opportunity to be heard in a court of law upon every question involving his rights or interests, before he is affected by any judicial decision on the question. The judgement of a court without hearing the party or giving him an opportunity to be heard is not a judicial determination of his rights...”

And to prevent “Fraud in Law” and it:

“is an intentional perversion of truth for the purpose of inducing another in reliance upon it to part with some valuable thing belonging to him, or to surrender a legal right; a false representation of a matter of fact which deceives and is intended to deceive another so that he shall act upon it to his legal injury. **Lincoln-Income Life Ins. Co v. Kraus** 132 S.W. 318, 321, 279 Ky. 842.”

- K. This Court has personal and subject matter jurisdiction under §92.57 F.S. WITNESS, RECORDS AND DOCUMENTS as Respondent Townsend is
- “In any civil action arising out of a violation of this section, the court may award attorney’s fees and punitive damages to the person unlawfully dismissed, in addition to actual damages suffered by such person.
3. This Court has subject matter jurisdiction for “equal protection” of/as the **Respondent** now Plaintiff being subjected since 1999, to criminal charges of Deputies, Clergy and their Schism and non truthful actions of attorneys, judges and sheriff and called “a child molester”, “abuser”, “a liar”, “dangerous”, “with guns” and “a stalker” or other immoral and slanderous names worthy as Denny alleged in the **FIRST AFFIRMATIVE DEFENSE** to allege the pending of “criminal charges” by Attorneys (2003), timely for Divorce Injunctions as Maliciously Prosecuted under Federal Law per the Affidavit of Ronald L. Beck of October 31, 2001, Filed November 2, 2001, as and of and act for Unlawful Sheriff Deputy Joe Howlett, a **TEMPORARY INJUNCTION FOR PROTECTION AGAINST REPEAT VIOLENCE** and by the Notarized Affidavit of Karen

Townsend as filed November 2, 2001, as **TEMPORARY INJUNCTION FOR PROTECTION AGAINST DOMESTIC VIOLENCE** CASE 01-15814, filed in Hillsborough County Domestic Violence Court and gaining **ORDERS OR COURT INJUNCTIONS** of November 2, 2001, and collectively served on Randy Townsend on November 3, 2001, which states:

“I UNDERSTAND THAT I AM SWEARING OR AFFIRMING UNDER OATH TO THE TRUTHFULNESS OF THE CLAIMS MADE IN THIS PETITION AND THAT THE PUNISHMENT FOR KNOWINGLY MAKING A FALSE STATEMENT INCLUDES FINES AND/OR IMPRISONMENT....

It is intended that this protection order meet the requirements of 18 U.S.C. §2265 and therefore intended that it be accorded full faith and credit by the court of another state or Indian tribe and enforced as if it were the order of the enforcing state or of the Indian tribe....Any violation of this injunction, whether or not at the invitation of Petitioner or anyone else, may subject Respondent to civil or indirect criminal contempt proceedings, including the imposition of a fine or imprisonment.... In addition, it is a federal criminal felony offense, punishable by up to life imprisonment, depending on the nature of the violation, to cross state lines or enter Indian country for the purpose of engaging in conduct that is prohibited in this injunction. 18 U.S.C. §2262.

This injunction is valid in all counties of the State of Florida. Violation of this injunction should be reported to the appropriate law enforcement agency. Law enforcement officers of the jurisdiction in which a violation of this injunction occurs shall enforce the provisions of this injunction, and are authorized to arrest without a warrant pursuant to section 901.15, Florida Statutes, for any violations of its provisions, which constitutes a criminal act under section 784.047, Florida Statutes.”

Further the Courts and Law Enforcement in protection of collusion of Scruggs “Personal belief not to make a church look bad” nor Sheriffs or deputies look “illegal” but fraudulently continue unlawfully to deprive Plaintiffs Rights by their unlawful continuing the damages of

a fraudulent scheme and abuse process and a criminal action and malicious prosecution action “permanently damaging parental rights” by Sheriffs, their Deputies, Attorneys, State Officers, Agencies and Courts allowing Townsend by fraud of “schism” deputies and pastors and persecuted by continuation of a malicious prosecution action by Judges who could not incriminate their Courts Executive Officer as the Sheriff deprived Townsend of any fair trial and instead punished Townsend by extortion of his children and removal by this appearing “permanent” Divorce Injunction in violation of

A. **Board of County Commissioners v. Charles H. Scruggs, III**

545 So2d 910, 1989, stating:

“In the Interest of D.B., 385 So2d 83,(Fla. 1980 1980 Fla. SCt 3450, the supreme court held that “counsel is necessarily required under the due process clause of the United States and Florida Constitutions, in proceedings involving the permanent termination of parental rights to a child, or when the proceedings, because of their nature, may lead to criminal child abuse charges.” Id. At 90. ...Although the right to counsel in criminal cases emanates from the sixth amendment, and in civil dependency and termination of parental rights proceedings, from due process considerations, counsel is required in each case because fundamental constitutional interests are at stake. See in the Interest of D.B., 385 So2d at 90 (preserving the family unit and raising one’s children are important and fundamental constitutionally protected interests); Makemson, 491 So.2d at 1113 (sixth amendment’s guarantee of effective assistance of counsel is fundamental and important).

B. **PER STONE Et.al v. WALL Et. al** 734 So2d 1038 (Fla. 1999), Defendants Willfully denying “equal protection” Do “interference with the father’s custody and seeking to recover damages, costs, and attorney fees related to the father’s recovery of custody.”

And in this case these actions by these alleged “clergy and others” by masked deputies and sheriffs and court and state officials intend to permanently by fraud do “interference” until resolved by this Court and as these Defendants conspire and Continue;

C. In violation of the **SUPREME COURT APPROVED SIMPLIFIED FORMS July 1993**, APPENDIX 4—

INJUNCTION FOR PROTECTION, Modeled after the Federal Laws stating:

“Under Florida Law, courts can make orders to protect people from physical violence of a spouse, former spouse, relative, person living with you now or in the past or the other parent of your child, whether or not you have ever been married or lived together. These orders are enforced by law enforcement agencies.

If you are a victim of any act of violence, or reasonable believe you are about to become a victim you can ask for protection from this violence. You still will have the right to this protection after the person moves out of your residence.

The person asking for the protection is the ‘petitioner/Plaintiff’ and the person who must obey the order is the ‘Respondent/Defendant’.

WHAT KIND OF ORDERS ARE AVAILABLE TO PREVENT DOMESTIC VIOLENCE?

- 1. If there is an immediate danger of violence, the court can issue an order without notice to the respondent. It will go into effect immediately when the respondent is served. (A Temporary Injunction for Protection Against Domestic Violence (Ex Parte) and Notice of Hearing (Form 16). It lasts until the next court hearing, but no longer than 30 days. In this order, the judge may:**
 - a. Tell the respondent not to “contact, molest, attack, strike, threaten, sexually assault, batter, telephone, or disturb the peace of the Petitioner.”**
 - b. Order the respondent to move out and not return to your home, and to take only personal clothing and effects.**
 - c. Tell the respondent to stay away from certain people and places such as your house or place of employment.**
 - d. Decide who has custody and visitation of children.**
 - e. Make other orders special to your situation to assure your safety.**
- 2. After a notice to the respondent and a hearing, the court may issue an order effective for up to one year. (Injunction for Protection Against Domestic Violence (After Notice) (Form 17). It can order the items listed in number 1 and also can order the respondent to pay child support and enter into counseling....Form 17—Injunction for Protection Against**

Domestic Violence (After Notice). This is the form signed by the court following the hearing. It is effective up to one year, unless the court terminates it earlier or extends it.”

**(1) TO THE FRAUD OF THE PENDING 2003 DIVORCE
INJUNCTION:**

“9. The Wife has requested a mutual injunction be entered by this court restraining either party from molesting, harassing, interfering and or bothering the other party. **It is therefor ORDERED AND ADJUDGED....**Both parties shall be enjoined from harassing, molesting, stalking, and bothering the party either directly, or indirectly or through any third parties. **This injunction shall remain in effect until further order of this Court.**”

(2) As this unequal action by Judges is a willful and wanton violation of the **court Rules of Juvenile matters to be followed and to be done in 6 months.**

(3) Per §26.49 F.S. “The sheriff of the county shall be the executive officer of the circuit court of the county” and per §30.07 F.S., the Sheriff is responsible for the illegal conduct of their deputies and per §30.15 F.S. these Sheriffs cannot perform their “Powers, duties and obligations” because of the defendants being under the Charge of the Sheriffs deputies and courts who have knowingly participated in criminal acts when it was these deputies and continuation of damages by attorneys and judges that allowed “Clergy and deputies” for 10 years to violate the FBCCP and Plaintiffs of Civil Rights and Due Process while depriving a Church GVM!

(4) Per §14, F.S., THE OFFICE OF THE GOVERNOR and the Office of the Attorney General and the Office of the State Attorney due to the “personal and prejudicial” rise to and role of now new Governor Charlie Crist as shown herein, Plaintiff has no State of Florida unbiased court as remedy of equal protection under the State of Florida Courts.

4. This Court has also personal and subject matter jurisdiction under “Equity” as per Justice Jackson in **COHEN** id. And **HEAD v. LANE** 495 So2d 821 (Fla. App. 4

Dist. 1986):

“Shareholder brought derivative action against defendant shareholders for breach of fiduciary duty by usurping corporate opportunity to purchase property.”

And as this case deals with Beck in collusion with non elected Church Trustees as Sheriff Deputies depriving the FBCCP Corporation and members of money and Rights, so Beck could purchase the 18105 North Gunn Highway, Hillsborough County property for “a personal pecuniary gain” as “to live in the country and have more bathrooms for his daughters” and as a miss appropriation of §617 F.S. Corporate Opportunity achieved by Fraudulent Practices and per §95.11(3) F.S. the statue of limitations is “the action must be begun within 12 years after the date of the commission of the alleged fraud,” and the frauds by deputies, Sheriffs, attorneys, judges, State Agents, Agencies and others has tolled all these issues. Confirming the Beck August 1999, and Position of the September 13, 1999, letter “...The ministry decisions made have been and will continue to be made with a total ministry view.” as fraud--- Experts confirm Beck was advised prior to the purchase of the 18105 Gunn Highway property that it would not be “permitted” for the special uses of the Church/School just as Townsend has confirmed since about 1997 per his leadership on the Property Acquisition Committee and as Long Range Planning Committee Chairman. The Ethics and lack thereof by Beck ET AL comes under the Supervision of the FBCCP Supreme Court Nominations Committee also of which Townsend is still continuing his investigation started in 1995. Also the 2006, partial records production showed personal frauds and a conspiracy to do frauds.

5. This Court has also personal and subject matter jurisdiction under **Nudd v. Burrows** 91 US 426, 23 L. Ed 286, as:

“The validity of a judgment may be affected by fraud in the obtainment thereof, or by collusion between the parties, especially where the court was imposed upon thereby and the complaining party was prevented from having his interests fairly presented or fully considered by the court.”

The facts of this case show that the Second District Court of Appeals (Justices Villanti, Wallace, Larose) with acts of fraud by James Birkhold as Clerk of the Court claim the 2DCA has “no jurisdiction”

to review the “past” allegations of Civil and Due Process violations of these Deputies, Sheriffs, Judges, Gray and others or of their own conspiracy actions in 2004, with/by the Attorney for Plaintiffs as Gray and thereby create a “policy” they do not intend to protect “Civil and Due Process Rights”. And further, this 2DCA, and Judges Fulmer, Altenbernd and Kelly, in 2D06-3469, by a PER CURIAM AFFIRMED decision attempt to conceal never before litigated litigants and or legal issues or expose frauds of and to the Courts and thereby confirm the conspired tort requirement those acting outside their duty of the Government or the agents thereof as “equal due process” and “equal protection” of *Kaisner v. Kolb* 543 So2d 732 (Fla. 1989) and by “NO” “equal protection” or “no equal due process” as “Hands OFF” has been the position of defendants in this case to these specific Plaintiffs even by the Florida Bar, The Judicial Qualifications Commission and by the Governor and Attorney General, and as doing “tort actions undertaken at the operational level” in violation of § 768.28(2), and all related statues per §768.28(1) and §768.28(9)(a) Florida Statues against Plaintiffs who Plead for the protection of the Federal Court and State Courts showing collusion and frauds back to the original Fraud of David Popper ET AL.

7. This Court also has Jurisdiction over each defendant AGENCY AND CORPORATION FOR FAILURE TO TRAIN AND PER RESPONDEAT SUPERIOR AND VICARIOUS LIABILITY VIOLATIONS OF LAW TO NEGLIGENTLY SUPERVISE AND RETAIN AS STATED in **MONELL v. NEW YORK CITY DEP'T OF SOCIAL SERVICES** 436 U.S. 658, 690 98 S. Ct. 2018, 56 L. Ed. 2d 611 (1978) and **GONZALEZ v. PUBLIC HEALTH TRUST** 686 F. Supp. 898, 899, 900 (S.D. Fla. 1988) and **violation of GARCIA v. REYES** 697 So2d 549 (Fla. 1997), as this as above and herein has been a violation of the Constitutional “Religious Right” of this Plaintiff and his children while each defendant knowingly gave “Benefit to Clergy” to expunge unlawfully these Plaintiff’s from their “Religious Rights” to membership at the FBCCP, Prior even to and during and after the arrival of Defendant Ron Beck, who with his private masked deputies as trustees knowingly, intentionally, recklessly and negligently violated the Constitutions of: The United States of America; The State of Florida; and The First Baptist Church of Citrus Park, Constitution and BY-LAWS process required to

lawfully do acts of Defendants including the Governor, Sheriffs and Courts before 1997.

8. This Court has Jurisdiction over each Agency and Department of the State Of Florida per **KAISNER v. KOLD** 543 So2d 732, 1989 Fla. SCt. 2682, and that the issues of NEGLIGENCE by the AGENCY OR DEPARTMENT is “We see no reason why the same analysis should not obtain in a case in which the zone of risk is created by the police.” Further, “There is a strong public policy in this state that, where reasonable men may differ, the question of foreseeability in negligence cases should be resolved by a jury.” Per **VINING. V. AVIS RENT-A-CAR** 354 So2d 54 (Fla. 1977), 1977 Fla. SCt. “Where a defendant’s conduct creates a foreseeable zone of risk, the law generally will recognize a duty placed upon the defendant to either to lessen the risk or see that sufficient precautions are taken to protect others from the harm that the risk poses. See **STEVENS v. JEFFERSON** 436 So2d 33, (Fla. 1983), 1983 Fla. SCt. 5164 and §768.28(6) Florida Statutes.
9. This Court has Jurisdiction PER **THE TORT CLAIMS ACT** which does not require claims-filing requirements over EACH INDIVIDUAL DEFENDANT FOR ALL MATTERS AS STATED HEREIN, PURSUANT TO **SMITH v. WADE** 461 U.S. 30, 55, 103 S. Ct. 1625, 75 L. 2d 632 (1983) AND TO AWARD PUNITIVE DAMAGES UPON THE FINDING OF A JURY TO ADJUDICATE AND FAIRLY COMPENSATE PLAINTIFF FOR ALL MATTERS AS STATED HEREIN.
10. This Court has Jurisdiction to determine intentional specific behavior and therefore per **Dominguez v. Equitable Life Assurance Society** 438 So2d 58 (Fla. 3rd 1983) shows sufficient proof that “emotional distress arose from the act”. All judges to protect the integrity of the court are not to allow fraud in the court by the aggressor who uses the fraud to the court to abuse the victim. This Court should retain jurisdiction to preserve the integrity of the Courts.
11. This Court has Jurisdiction per **EXXON CORP. USA v. DUNN** 474 So2d 1269, “Damages for emotional distress may be recovered from a defendant who maintains a nuisance, regardless of physical injury or

impact. Annoyance, discomfort, inconvenience, and the like are the natural results of a nuisance and are thus compensable, even if the defendant did not intentionally, maliciously or recklessly create or maintain the nuisance”

12. This Court has Jurisdiction to determine “Compensation for injuries to and to what extent involve emotional distress may also be recovered through such acts as torts as false imprisonment, assault and battery, wrongful birth and defamation.”

PER FLORIDA TORTS 23.30 as Plaintiff Townsend has plead with each and every person and agency and tried to get help from these Defendants as they have allowed Plaintiffs rights with the children to be abused by the then wife/now former wife and mother as an employee of Ron Beck and Herman Meister and the Church Trustees through Sheriff Deputies Howlett and Jeffers for the First Baptist Church of Citrus Park Corporation who acted outside the LAW and the BY-LAWS and violated Plaintiffs just trying to operate civilly under the Laws of Florida and of the Corporation BY-LAWS as was and still is our duty. All Defendants who have once they got knowledge of these issues and lied to Plaintiff and alleged Plaintiffs had no rights, lost Plaintiffs rights, or had no cause of actions, or could not combine defendants and or causes of actions just to continue and protect themselves due to statue of limitations violations of due process have just continued the frauds and torts by the criminal acts of the SCHISM Officers .

CHAMPION v. GRAY 478 So2d 17 (Fla. 1985) These abusive actions by BECK and MEISTER started against Townsend’s in 1996, when Beck and Meister made the pack to get rid of this LRPC CHAIRMAN and member so they could pull off their “scheme to fraud” of the Master Building Plan corruption alleged as a “VISION” and started frauds about Plaintiff to my wife and children and others. This is well documented in the BUSINESS MEETING MINUTES and confirmed by Affidavits from Witnesses to the intentional frauds of Beck and Meister. In 1996, Plaintiff’s son, J.D.T was 13 and Plaintiff’s daughter, J.G.T., was just 11 years old enrolled as students at Citrus Park Christian School and attending the Church. The March 24, 1996, Business Meeting Minutes state that the proposal of what the Church can do, will come from the LONG RANGE PLANNING COMMITTEE.(LRPC) The LRPC by this Chairman Townsend objected to the promotion of fraudulent plans in the Eminent Domain Litigation in order to obtain a greater payment when the projects were not intended to be done.

Additionally the lawyer for Hillsborough County at the settlement meeting was Pat Bean and she used a case decided by Judge Rom Powell to limit the claims. Townsend also knowing the political rather than pure judicial acts of Judge Rom Powell objected to using as law any findings of Powell in deciding a fair Eminent Domain settlement.

13. This Court has Jurisdiction, Quoting Chapter 67 of Florida Jury Instructions by Richard B. Badgley, at 67.01[3]—Comment, “The Florida Supreme Court has adopted the position set forth in the *Restatement (Second) of Torts §46*, which acknowledges the existence of an independent tort for intentional infliction of emotional distress.¹ At the same time, recovery of damages for emotional distress in a cause of action for another tort remains viable. ² Damages may be recovered for emotional distress without a showing a bodily harm resulting from the emotional distress. ³ Examples of this include ...certain abusive debt collection practices.⁵ Conduct that is actionable as intentional infliction of emotional distress may also give rise to liability for malicious infliction of emotional distress, for which punitive damages may be sought.⁶ 67.02[3] “Abuse of real or apparent authority over a plaintiff may also rise to the level of extreme and outrageous conduct.⁵ Examples of Florida cases in this category include...and abuse of position by a police officer.⁷” Per **CITY OF DELAND v. FLORIDA TRANSPORTATION AND LEASING CORP** 293 So2d 800 (Fla. 1st DCA 1974)

14. **MT. OLIVE PRIMITIVE BAPTIST ET AL v. HARRIS et al.** 860 So2d 520 (Fla. App 1 DIST. 2003) allows Plaintiff’s rights by stating: **“RELIGIOUS SOCIETIES ¶31(4)** Church representatives’ complaint against church and its pastor, asserted by representatives as individuals on derivative basis on behalf of church, set forth sufficient allegations of ultimate fact to withstand motion to dismiss for failure to state a cause of action, ...”

15. Further this Court has personal jurisdiction and subject matter jurisdiction as these are so related to other “joint” acts per these Florida Statutes: 39 F.S.(Proceedings related to Juveniles); s. 61 F.S.(Dissolution of marriage); All Florida Statutes relating to duties of Public Officers; s.117 F.S. (Notaries Public); s. 415 F.S. (Children’s Protection From Abuse, Neglect and Exploitation); s. 458 F.S.(Medical Malpractice);

s.617 F.S.(Not for profit Corporation); s.623 F.S. (Private School); and as employees for FBCCP and CPCS and members assisting to block Corporations records disclosure directly assisting the Directors actions in violation of: s. 617.1601 (Reporting of records); s.617.1602, (Inspection of Records); s.617.0834 F.S.(Duty and Violation of Duties); s. 617.0841 (Duty to Follow By-Laws); s. 617.1605 (60 days end of year reporting requirement or per By-laws) s.617.10 F.S., (members right to be heard before removal in Not For Profit Corporation); s. 784 F.S. (Assault; Battery; Stalking; Culpable negligence); s.787 F.S. (false imprisonment; custody offenses); s. 772 F.S., Civil Remedies for Criminal Practices as; s. 812, F.S.(theft and related crimes); s.817, F.S., (assisting Corporate officers in violation of Fraud and Credit Card crimes); s. 836.05, F.S., (extortion); s. 837,F.S. and 914.13(perjury); s. 914.14 (Witness accepting bribe); 914.21 and 914.22 and 914.23 and 914.25 (treatment of witnesses); s. 843 F.S. (Obstruction of Justice); s. 817.49 F.S. (False report of commission of crimes; penalty); s. 772.102(4), F.S. (as such actions show a pattern of criminal activity); s. 775 and specifically 775.085 F.S. (Evidencing prejudice while committing offense; enhanced penalties); s. 775.089 F.S.(Restitution); s. 402,F.S.(Child Care facilities); s. 827 F.S. (abuse of Children) ; s. 836 F.S. (Defamation and Publications to expose person to hatred, contempt, or ridicule prohibited); s.838 F.S.(Bribery; misuse of public office); s. 839, F.S., (Offenses by Public Officers and Employees); s.843 F.S.(Obstructing Justice) s. 871.01 & 871.02, F.S. (Disturbing Religious and other assemblies); s.877 F.S. (Hate Crimes); s. 895, F.S. (R.I.C.O.); §623; §741 s. 768 F.S. (Florida Tort Claims Act); s.918 F.S. (Conduct of Criminal trial [Repeat Violence charges per s. 784 and 18.U.S.C. on November 15, 2001]); s. 943 F.S. (Department of Law Enforcement) and thus the “Sect” and “Sect Agents” have illegally by any and all actions giving Unlawful Benefit to Clergy as Beck or Jeffers have are still are assisting in the violation of:

F.S.§812.012(2) “Obtains or uses means any manner of:

- (a) Taking or exercising control over property.
 - (b) Making any unauthorized use, disposition, or transfer of property.
 - (c) Obtaining property by fraud, willful misrepresentation of a future act, or false promise.
 - (d) Conduct previously known as stealing; larceny; purloining; abstracting; embezzlement; misapplication; misappropriation; conversion; or obtaining money or property by false pretense, fraud, or deception; or
1. Other conduct similar in nature.”

CLOSING ARGUMENT

1. A quorum of this Florida Supreme Court is compromised to hear and Grant this Consent Judgement or even remain Justices on the Bench as that the underlying cases stated herein showed justices (Quince, Anstead, Wells, Pariente, Cantero, Bell, Lewis) were in felony violation of the law and must have their previous Orders vacated and some recuse or arrest themselves based on:

A. Bias and Prejudice by the fact that in earlier decisions these same justices assisted in the delay of the Florida False Claims Act, Constitutional Rights (State and Federal), Faith Based Religious Constitutional and Contract Rights and by the Florida's Religious Freedom Restoration Act, Parent Rights, Due Process Rights and as Respondents Rights as these current justices knowingly allow attorney Gray to continue the same ongoing acts by her co-conspirator participants and herself that violated her and their clients or tax payers they are to equally "serve and protect";

B. During these earlier matters brought before these Supreme Court Justices the report of Attorney General Bob Butterworth AGO 96-41, showed justices (Quince, Anstead, Wells, Pariente, Cantero, Bell, Lewis) in violation of F.S. §876.05 through §876.10, regarding their

failure to properly File State Loyalty Oaths as A.G./Gov. Charlie Crist per F.S. §16.56(A.G. Office of Statewide Prosecution) and “others” gained “leveraged prejudice” as participants Crist/Bush ET AL verses Citizens plaintiffs herein and failed to have these Justices swear and thereby gain protection per the law for or of violations of the laws as shown herein. Their rulings during this time regarding Townsend cases therefore can be attacked as legal nullities and they are subject to removal per writ of quo warranto and without legal protection as co-participants of these State and Federal crimes still on going in the criminal enterprise began by Attorney Popper ET AL. Therefore these justices have an individual and direct prejudice to not let Townsend have “a day in court” and reveal their “enterprise” showing violation of Florida’s Anti-SLAPP Statue 768.295 which prohibits any governmental entity, including this judicial branch, from seeking in any way whatsoever to punish a citizen who has “blown the whistle” on any misconduct by the state government such as done by Jeffers ET Al and Popper ET AL all connected under the supervision as agents of this Supreme Court, John Harkness, John Berry ET AL;

C. These justices also have knowledge that the finding of the ABA 1992 McKay Commission Report on Evaluation of Disciplinary

Enforcement has potential “RISK” for “undue and unequal process” and the citizens herein have had insufficient representation and even suppression of their civil rights trying to have a voice against these same government oppressors under the directive of Florida Bar John Berry since reporting Florida Bar Cases 93-31, 692 (09A); 93-31, 691 (09A); and 93-31,690 (09A) and cases then suppressed by: The Florida Bar admitting “This is the worse case of abuse I have seen by an attorney on his client but my boss has told me to close this file and never talk to you again, Good Bye!” and the 1999 threat by the Florida Bar stating “If you ever get your law degree then I personally will see that you get disbarred within 6 months”; Governor Jeb Bush now proved not keeping his 1998 Town Hall Meeting (TV 13) Promise to these Plaintiffs and voters and by the now exposed personally prejudiced agenda of Attorney General/Gov. Charlie Crist (admitted biased as Crist said to the investigators in 2006-7, against the name Townsend as it is the same name taken by the married Rebecca O’dell Townsend who claims Charlie Crist fathered her child and Crist thought the persons “Townsend” were related and instigating a conspired claim) before these justices as Townsend v. Popper SC 98-1866 and Townsend v. Chapin SC 98-2111, showed

these same felony violations of attorney/Client as for which now Heather Gray and “others” since were disbarred but for which Chapin and Popper received now proved special treatment; and

D. 18 USC 241 and 18 USC 242 make it a criminal act for anyone, whether acting under color of state law or other law, to threaten a citizen for the exercise of any Constitutional Right and these Townsend cases as admitted by judges and the co-defendants confess their own actions with these of attorney Gray and other co-conspirator participants that Townsend, individual and as F.S.§617 et al and those citizen tax payers for whom he speaks are violated beyond what is allowed under the 14th Amendment of our U.S. Constitution with even ongoing threats by State Officers And Federal Judge Merryday to violate his own “Aisenberg Rule” as shown and attached hereto by ongoing acts of defendants above and “others Doe” yet unknown;

E. Chapter 119 Public Records Laws have been and are being buried by defendants and others that shows connecting proof of these conspired “threats” including still ongoing: “larceny”, “obstruction”; “interference with parent/child now adult custody”; “threat of arrest since 09/08/1999, of a member for doing his Church duty”; and “false detainment”; since Townsend first said what crimes were and

still are being done by defendants;

So Plaintiffs allege herein that in 1999 or before that as stated by “Root”

investigator for the Florida Bar it was then “the worse case of abuse I

have ever seen...” the Supreme Court Justices as Superiors must look

at what attorney Gray with a duty to reveal allowed to occur as

admitted by Federal Judge James Moody Jr. 3/15/2007 and this court

still knows is ongoing against tax payer citizens and even “Faith

Based” Citizens “violated” directly by Jeffers/Bar/Crist/Gray ET AL.

2. Is each justice on this court willing to say to the people Gray and her co-

participants still violate, “this Florida Supreme Court is intentionally

ignoring Florida Constitution Florida Constitution Rights of Article I

Section 3”:

“**Religious freedom.**--- There shall be no law respecting the establishment of religion or prohibiting or penalizing the free exercise thereof. Religious freedom shall not justify practices inconsistent with public morals, peace or safety. No revenue of the state or any political subdivision or agency thereof shall ever be taken from the public treasury directly or indirectly in aid of any church, sect, or religious denomination or in aid of any sectarian institution....”

Because if you accept the manner in which this **Consent Judgement** is

reached and currently stands and allow lower courts as judge Cook for

defendants say to Townsend and Townsend ET AL on 08/19/2009 and

09/02/2009 you cannot talk to or represent your F.S.§617 kids who were

and are victimized parties of Gray ET AL and then “to dismiss victim

Respondents Complaint now Plaintiffs claims of Grays ET AL violations then each justice has MENS REA knowledge and says that the citizens that Heather Gray ET AL has violated have no voice for their restitution and protection of Constitutional Rights of speech, assembly even with their own children, commerce, vote even on religious By-Laws standards as then each justice is saying:

A. The Deputy Jeffers led “sect” inside the church and then the agents this sect still uses as defendants listed above and up to this court on this day as “undue and unequal process” extensions of Jeffers/Florida Senator Grant as Registered Agent attempted to be concealed by Judge Crenshaw and other “government agents/Denny/Scruggs/Gray can violate US Constitution Article 14 and use his “government” uniform, position of superior knowledge and co-participants (government and “sect others”) threats to do:

(1) violations of the FBCCP Contract in 1995 and proved ongoing by deputies Jeffers, Howlett, and Smoak and their “Agents” by Mens Rea acts now fully admitted as they knowingly:

(A) allow fraud creating and “uttering false reports” as:

1. False reports to minor kids under 18 that the “sect” is Ethical and acting per their Rules of the By-Laws;

2. False Business Reports Every 90 Days as Truthful
Business Reports are required to be presented to the Membership at all times in reports every quarter and once in a year end business report;
3. False “Audits” of the Reports and Accounting Practices confirmed as frauds by C.P.A. Mr. Horgan so much that “he pulled his kids from the school and separate his C.P.A. firm with Mr. Janssen”;
4. False reports to Hillsborough County and the membership in the Eminent Domain litigation;
5. False reports as to the “permit” process of the 7705 and 18105 Gunn Highway Properties done through years of wasted litigation as the “sect” was knowingly advised by experts in 1997 before the property was purchased in fraud to the members that the permits for the CPCS would not be allowed;
6. False reports to the membership and community during these years of false reports of daily business practices “under color of law” that honorable deputies and clergy were lawfully acting without “risks”;

7. False reports as to the purchase of the 18105 Gunn Highway Property as the membership said do not buy the property without the guarantee of the approved “permits” needed for the Church/School;
8. False reports on Loans received for Building Projects;
9. False reports as to the Cogan Building Reports;
10. False reports as to the Building Stages on the 18105 Property;
11. False reports as to the Truths Townsend told which at the time these in the “sect” called them lies based on their “under color of law” superior knowledge;
12. False reports as to the By-Laws Rights and Process and that Townsend did not have legal rights during this investigation and F.S.617 process since 1995 to protect the FBCCP Corporation and Members Rights against the treason of the “sect”, deputies and their Conspiring Agents only serving the “Jeffers sect”;
13. False reports as to the 01-15813 and 01-15814 and 02-4974 and 02-03812 and 06-6005 and other litigation against Townsend to achieve their criminal enterprise

against Townsend and those for whom he speaks
being assisted by the intentional frauds of your
Supreme Court Florida Bar Agents and “others” and
various other False Reports from Popper ET AL;

(B) still do “interference with child custody and false
detainment” by themselves as a “sect” and the “sect as
Finance Committee with pastors and as employees
manipulating assets for personal gain against F.S.617 rules
and FBCCP Contract rules” and the “sect agents” to the
members at a time of their votes for the voice of their rights
and invested property (as even their children’s relationships
and rights) by the FBCCP/CPCS contract(s) and
Constitutions (U.S., Florida, FBCCP).

(2) Violations of the conscience of any “honorable” citizen knowing
their children and assets can be confiscated by an allegedly
“honorable” government person without “constitutional and
contract” “due process” just to retaliate to conceal their first “under
color of law” detainment in violation of Florida Constitution
Article I, Section 3.

B. fraud by still “uttering false reports” to a still naïve FBCCP

membership and citizens requiring these citizens to still pay and compensate the “sect” and “sect agents” during the “sects” detainment while Members try to “Whistle” their revolt to now proved “sect” and “sect agents” “uttered false reports” admitted by judges causing “sectarian” damages and detainment since 1995 or before.

C. falsely harass, detain, trespass and obstruct recovery of stolen and illegally gained property and detainment from ones children for over 10 years by sectarian “false reports”.

3. Judge Marva Crenshaw already by her Circuit Court Actions in 2006, Case 02-03812, and co-judges confess malicious prosecutions as she even on May 10, 2006, rewrote the Malicious Prosecution Count which also proves her intentional acts to omit those as Gray ET AL who now are proved to have been directly involved with Torts to not properly report the fact and the laws and still act to continue frauds that are being done “retaliating” against Randall Townsend individual, and Townsend as FBCCP Nominations Officer and plaintiffs for whom Townsend per F.S.§617, represents and speaks.
4. The only matter that Judge Crenshaw in 2003-2006 did not allow or settle in her attempted “undue process”, “unlawful detention deal brokering concealing all defendants”, “Summary Judgement attempt” is Randall

Townsend and Townsend ET AL listing per **PELLEGRINI V. WINTER** 476 2d1363 those intentionally “Mens Rea” acting in her rewritten Malicious Prosecution Count on May 10, 2006, and listing these “Mens Rea” intentional actors in the September 7, 2006 transcript now attempted and continuing the Obstruction Of Civil Contract Rights as the threat and dismissed by Judge Cooks wrongful statements to conceal all the defendants and all the criminal participants acts left still unknown because of governments “impeding” of “Due Process” of Church Members in an internal investigation and as Tax Payers these Members being allowed their Constitutional and Contract(s) Right to exercise their First Amendment and FBCCP Rights and Votes. The deprivations and patterns left unlawfully undone by judge Crenshaw and her co-participants are still ongoing against Plaintiffs as shown below and based on other data still to be collected but being “impeded” by these same extensions of (“deputy” Jeffers ET AL) frauds and “unlawful detentions” against defendants.

5. The founding fathers of the U.S. Constitution, the Florida Constitution and the FBCCP By-Laws prohibit “government impeding” of Faith Based Rights and deems this “Bad Behavior” per the Common Public understanding that “uttering false reports” inside a Church Faith Based

Charity should not be advanced, tolerated or exalted.

6. This court quoting Malicki v. Doe 814 So2d 347 (Fla. 2002, March)

page 361, Footnote 12, states:

“...As has been explained: “the public policy of this state, as declared by Section 4 of the Declaration of Rights of our Florida Constitution, ‘is to put justice “by due course of law” above or before charity.’” *Russell*, 196 So.2d at 121 (Roberts, J., concurring)..”

and it is defendants who intentionally use this case since April 2002 or

before per the DCA standards as overturned by this Florida Supreme

Superior Court and Plaintiffs advocate that Florida Constitution Rights of

Article I Section 3:

“Religious freedom.--- There shall be no law respecting the establishment of religion or prohibiting or penalizing the free exercise thereof. Religious freedom shall not justify practices inconsistent with public morals, peace or safety. No revenue of the state or any political subdivision or agency thereof shall ever be taken from the public treasury directly or indirectly in aid of any church, sect, or religious denomination or in aid of any sectarian institution....”

have already been voiced and by frauds of defendants above herein by

frauds defined and frauds still unknown partly allowed “impede” the

voice of Tax Payers, FBCCP Members to when they finally learned of

the violations by “pastors” and “others” spoke by their votes of

termination of “employee pastors Nasworthy, Brown, Meister,

Beck ” and “others” despite the attempts by Deputy Tim Jeffers since

1995 directing his frauds to Tim Jeffers fellow members and citizens

using his Deputy status and Agents wrongly under color of law as assisted by Jeffers government agents sect.

7. All defenses by “sect” Jeffers et al and as government defendants were “estopped” when in June/July 2006 the repeatedly blocked FBCCP Jeffers Finance Committee Records demanded since the Demand Meeting of September 8, 1999, and before since 10/1995, the “9-11 What is your emergency!” plea by CPCS School Pastor Dr. John Berry and FBCCP Nominations Committee Ethics Supreme Court Member Randall Townsend said to alleged honest “government officers” stop the pastors (Nasworthy/Beck) frauds and “Show me the money”. Some “FBCCP Records” were per judge Crenshaw “against her better judgement” were partially produced exposing the Jeffers et al conspiring motives of larceny, tax evasion, extortion, uttering false records, and extortion of kidnapping since October 1999 and before by the sect and sect agents doing and confirming the malicious prosecution count in case 02-03812 as written by judge Crenshaw and showing torts against the By-laws and against Church Members as Plaintiffs herein. Thus the motives by defendants to produce false reports to conceal their felonies Townsend has now proved by his “Faith Based Contract” duty as the Supreme Court Ethics Leader per the FBCCP By-Laws as he was elected

to do since 1994, for the safety and rights of the members and children.

8. It is a continuing “uttering false records” by this Florida Supreme Court and Florida Bar to broker the Consent Judgement based on the terms of Heather Mary Ann Gray as her client victims know her intentional “negligent” Tort representation acts were and are not mistake but calculated “uttering false records” to conceal deprivations by her: superior; equal; and lesser co-government co-participants as the appeal attorney or paid “Quid Pro Quo” public defender to conceal and misdirect facts of violations of due process and rights by government deputies Jeffers, Howlett, Smoak, Corbin and Coast Guard Mike Shumate “uttering false records” since about 1995. Per the duty of the laws and Constitutions of Florida and these United States this Florida Supreme Court cannot knowingly “utter false records” that assist their “subjects” or “agents” in the furtherance of a criminal act or acts that in these matters shows are ongoing as “Hate Crimes” and “Retaliations of Obstruction” by government persons ignoring “Faith Based Persons Rights and Family Rights”. The criminal acts violate “due process” and continue a tort as long as any defendant listed above herein or any person as their “agent” “impedes” Church Member Randall Townsend “detained and kidnapped” from his children, family, Fellow Church

Members and Church Records as they existed since October 1995, when now terminated administrative “pastor” Elbert Nasworthy admitted in the FBCCP Business Meeting “Uttering false records” to conceal a crime and the FBCCP By-law investigation by Randall Townsend and his members was “impeded” by government deputy Tim Jeffers violations of his duty as the FBCCP Finance Committee Chairman and “under color of law” a government deputy behind concealing frauds that to this day are by torts still concealed by his co-sect and superior government participants including judge Cook, per the laws including F.S.§617 and “others”.

9. Allowing the **Consent Judgment** for your “Agent” Heather Mary Ann Gray (Gray) is this court Giving a “Get out of Jail Free Card” while you knowingly ignore F.S. 454 still ongoing violations of law including criminal acts of a person, mother, attorney, “alleged specialist” appellant attorney, “alleged Pro Se Advocate Specialist” attorney”, public defender, a co-conspirator with those for who she is intentionally “Tortfully” “negligent” to the clients gaining her living by falsehoods knowingly and intentionally doing with her co-participants the same acts as the female version of John Couey, Bernie Madoff and countless other criminals the alleged Florida justice system has sent to “Old Sparky” or

those as the government agents in the Baby Sabrina Aisenberg/Terry kidnapping case conspired against the parents to conceal malfeasance by the “law enforcers” as in this case directly within the unlawful control of Hillsborough County Colonel Gary Terry, Governor Charlie Crist, Sheriff David Gee, Sheriff Jim Coats, State Attorney Mark Ober, Hillsborough County Administrator Pat Bean, Jim Norman, Plaintiffs alleged attorneys, Charles Scruggs and “Others” continuing the malicious torts against the FBCCP By-laws Process and Members since 1995 through unlawful F.S. §870.06 deputies Jeffers, Howlett, Smoak, Corbin as a “sect” in violation of **Kaiser v. Kolb** 543 So2d 732 (Fla. 1989) “officers illegal detaining” and **PELLEGRINI V. WINTER** 476 2d1363 with “others” who formed a secret “sect” with “extrinsic frauds” by creating **RICO CONSPIRED UTTERING FORGED INSTRUMENTS** (1995-now FBCCP/CPCS Reports, W-2’s, 1099’s, Jeffers Finance Committee Reviews, Cogan Building Report Fraud, Eminent Domain Litigation Fraud, Horgan & Janssen C.P.A. Audits Frauds, 9/08/1999, frauds against FBCCP Supreme Court Townsend doing his elected Demand Duty (not lunacy) per the Membership votes, Filing Cases 01-15813, Felony Repeat Violence and 01-15814, Felony Domestic Violence against Randall Townsend and Divorce Case 02-4974

and 02-03812, extrinsic frauds and frauds included in cases cited above and in www.Judgeoneyourself.com and consolidated herein to conceal “tortious conduct” and By-Laws violations thereof of themselves, “pastors”, “employed family members” and unauthorized “lay persons” violations of Church Defendants (Plaintiffs herein) as stated by this Florida Supreme Court in **Malicki v. Doe** 814 So2d 347 (Fla. 2002) (March 14,2002) and concealed in intentional conspiracy by defendants judges and plaintiffs former attorneys even fraudulently knowingly admitted in transcripts by judge Crenshaw in 2006 as Mens Rea using the DCA’s overturned positions as in **Doe v. Evans** 718 So.2d 286, to advance the Jeffers sect who these “government persons” sought to still conceal illegally by unequal due process and government intrusion by larceny, kidnapping and taking citizens kids and property started by deputy Jeffers and his wife (Karen Jeffers) as the FBCCP school principal’s tort and anti-By-Law collusion’s concealing “tort pastors” even violating this fathers and his children’s protections of

F.S.450.061(2):

“No minor under 18 years of age, whether such person’s disabilities of nonage have been removed by marriage or otherwise, shall be employed or permitted or suffered to work in any place of employment or at any occupation hazardous or injurious to the life, health, safety, or welfare of such minor, as such places of employment or occupations may be determined and declared by the Division of

Labor, Employment Security to be hazardous and injurious to the life, health, safety, or welfare of such minor.”

As Jeffers ET AL and a willful Karen “Harrod” Townsend gained obstruction and extortion of all Plaintiffs by uttering forged reports (grades, CPCS enrollment, Scholarships), and giving CPCS employment to and future employment and scholarships to “others”, as long as they to and of CPCS Students J.D.T. and J.G.T. to mentally control and damage minors and “others”;

10. True “Faith Based” Persons acts do not, are not and cannot be advanced by Fraud(s) done by their own hands or of “non Supreme others”.

11. True Constitutional Rights and Constitutional Duties do not and are not and cannot be advanced by frauds of a party to a contract per:

- a. “PER TOUT ET NON PER MY” of determining rights of joint property;
- b. PER SE proofs as Breach of Duty, Defamation, Frauds and Conduct in violation of the Sherman Anti Trust Acts;
- c. Per the Federal Ruling by James Merryday, known as the **Aisenberg Rule** showing proofs of law enforcers collusion to deprive civil rights of victims during an investigation of a criminal act and the resulting court “due and equal process” as proof of the McKay Report Risks; as a Matter of Law, FBCCP By-Laws and Citizens Common Sense still

violating citizens joint property and personal property and “False Public Light” by collusion of Jeffers ET AL defendants still impeding the 1995-now investigation by Church members.

12. Per the FBCCP By-Laws, FBCCP Members 1993-now Votes, The Florida Constitution Article I. Section 3. requires it a jury Right not “sectarian” Jeffers ET AL Agents and judges self- immunity discretion nor Florida Bar self-immunity deprivation of victim citizens by “alleged” law enforcers under the “color” as Faith Based Charity stealing Church Members Rights and Assets for themselves.

13. Tim Jeffers master-mined the crimes and Jeffers ET AL continues preventing Townsend from his kidnapped and extorted kids now since 09/08/1999 “Demand Meeting” and Church Membership Duties proved now by years of litigation’s Gray and her participants is to expose rather than even use kidnapping and threats of arrest for even attending a Church function as Townsend’s membership duties required per the By-Laws as the collusion of government “continuing Malicious Prosecution”, “defamation”, “False Arrest” and “uttering false records” just for Jeffers was proved by the Hillsborough County Sheriff’s Office Trespass Warning #07-650170 of 10/28/2007, and affidavits and court under oath testimony of Ron Beck to judge Palomino of 11/15/2001 in

case 01-15813 and under oath testimony of Karen Harrod Townsend on 11/15/2001 in case 01-15814 and testimony and affidavit to the courts of judge Timmerman in divorce case 02-4974 and judge Holder in case 05-9605 proving all claims Randall Townsend made since 1995 or before as attorneys Popper, Chapin, Crist, Gibbs, Grant, Scruggs, Turmel, Denny, Rolfes, Gray, Solomon and the judges and the agents of this Florida Supreme Court as the Florida Bar and Judicial Qualifications Commission and DCA's were and are to advocate in the course of "equal and due" pursuit of justice per your own words and laws.

14. This alleged U.S. Constitutional Article III, "Good Behaviour" "judge" (Martha J. Cook) and subject to the Florida Supreme Court, Appeals Courts, Citizen Tax Payers, the Constitutions and Laws now as a newly joined participant with her co-conspirators is intentionally attempting to conspire to conceal the malum in se (evil in itself) Gray acts of intentionally malum in se acts of concealing the villains acts of those conspirators against who she was paid by her clients to appeal the prohibited criminal acts in violation of Constitutional Due Process to continue a fraud and other crimes and violation of and on: the judicial system; "due process"; "equal process"; and a fraud and conspiracy against Plaintiffs to violate their: "Religious rights"; and "Contract

Rights”; and “Due and Equal Process Rights”; and various
“Constitutional Rights” as stated in the Verified Complaint attempting to
being dismissed with prejudice.

15. This alleged “judge” is still prejudicially ruling in this case after being
added as a defendant party and advised to recuse herself based on her
prejudicial tort violations of: Rules of Civil Process; Plaintiffs Contract,
Constitutional, Religious and Family Rights; and bias shown in defiance
of the Orders of her superiors and judges as she continues the
deprivations by her co-defendant “Jeffers et al government agents”
before they lawfully gained jurisdiction to “impede” Plaintiff’s Rights
and use of Plaintiffs property by larceny, tax evasion and frauds since
about 1995 to now and in the future without a fair trial after discovery of
records Plaintiffs have sought from “government agents” impeding
FBCCP Religious Members and parents protections of their children
from “interference by law enforcers without due process” and to do a
criminal act or acts still ongoing and since about 1995 to Plaintiffs and as
Citizens they are to serve per their oaths to law. The “9-11” **calls** in 1995
to deputy Jeffers is to expose crimes and violations of Faith Based First
Baptist Church of Citrus Park members rights since 1995 and not allow
him to be the creator of the sect and sectarian agents conspirators

chronicled now since 1995 as has been proved by the “discovery” Jeffers Government Agents delayed as Gray was paid to appeal as Townsend paid her to do per the directive of attorney Charles H. Scruggs III, since 2003 and judges in conspiracy with Scruggs as a former circuit judge. With Scruggs, Gray was hired and paid March 2003 and was retained until about August 2004, when she was reprimanded multiple times for the now proved same patterns of neglect to clients as reported in 2004 by judge Frank Gomez and the Second District Court of Appeals who finally exposed her criminal patterns Townsend exposed to them first in 2004.

16. The ruling of judge Cook is in violation of the Eleventh District Court of Appeals Ruling in this matter in that the Eleventh Court and En Banc stated the “discovery” process by the lower courts had been inadequate so therefor they could not rule, thus sending the matter back to the circuit courts by this 06-6005 case now judge Cook again ignoring the Orders of her superior judges and the laws that she advances the cover up of deprivations still ongoing by the “government Jeffers et al sect” by her refusal to grant discovery and close this case with prejudice prior to “due process” and to allow more crimes against this “Whistle Blower”.

17. Defendant Scruggs as a former circuit judge and professed expert with all types of litigation as for protection of all Plaintiffs Rights was retained

since July 2000 through September 30, 2003, when he confessed, “My personal convictions do not allow me to make a church look bad” and “I never intended to bring the church matters into the divorce case”.

Documents show that even after being terminated attorney Scruggs conspires with co-defendants to “impede” his former clients rights with the same patterns as this Supreme Court found against Heather Gray hired per direct advice of Scruggs. Scruggs Mens rea actions exposed in his letter to Townsend created extrinsic frauds and other diversions intentionally against his own clients to word a Divorce Injunction of 2003 with conspiring judge Timmerman and not using approved Family Law Forms to word a now proved clause for fraud as still used by HCSO Deputies and judge Cook in September 2009. Gray ET AL knowing the “Scruggs Mens rea” deprivations against his and her clients was a fact for the rights of the clients for appeal that the knowingly and intentionally refused and by fraud did not advocate per her “appeals” duty so to conceal her acts with her co-conspirators herein and “others Doe”.

18.Scruggs documented malum in se prohibited actions with the co-conspirators against Townsend reveals the RICO deprivation warned of in the ABA 1992 McKay Commission Report and exposes the corruption of formerly known “Chain Gang Charlie” Crist as Attorney General and

Governor to abandon citizens as he directed a corrupt alliance with Jeb Bush, John Harkness, John Berry, Bruce Chapin, Linda Chapin, Mark Ober, Scruggs, judges and the “others” listed above and “others Doe” who continue to fraudulently utter forged instruments.

19. Defendants Heather Gray ET AL was disbarred (for at least 3 years with conditions before reinstatement) by the Florida Supreme Court and found “...in serious misconduct by committing multiple violations, including Rule 4-3.4(c) (failure to obey the order of a tribunal)...” And as said tribunal was even the Second District Court of Appeals who were of those who brought charges against defendants doing acts to many persons just as the 2DCA reprimanded her for the same patterns in her duties to these Plaintiffs in 2004 were known and unlawfully neglected.

Therefore, likewise by this Consent Judgement being “...in serious misconduct by committing multiple violations, including Rule 4-3.4(c) (failure to obey the order of a tribunal)...” And “...Rule 4-8(c) conduct involving dishonesty, fraud, deceit or misrepresentation)...” is not it a Standing Order of the Tribunal to follow the Florida Constitution and Rules of Law in how these authors of the Consent Judgement show violation of Rule 4-8(c) intentionally as well as their Report “intentionally omits” true facts to cause “fraud, deceit or

misrepresentation” to allow ongoing criminal felony acts.

20. Defendants Heather Gray ET AL has engaged in fraud to the court(s) and in this 06-6005 Case just as the findings of the Florida Bar stated she violated “...Rule 4-8(c) conduct involving dishonesty, fraud, deceit or misrepresentation)...”. Defendant per page 8, of the 12/10/09, signed statement made to and “IN THE SUPREME COURT OF FLORIDA Case No. SC09-1121....**CONDITIONAL GUILTY PLEA FOR CONSENT JUDGMENT**...In light of these proceedings and her mental health issues, Respondent has ceased the active practice of law. In July 2009, Respondent voluntarily elected to be placed on inactive membership status with the Florida Bar...” and therefore the papers filed and practice of law to this court by this defendant are moot as she is not allowed to practice law based on her own **CONSENT JUDGMENT** admissions she and judge Cook ET AL. 8/2009 till now try to evade.

21. Plaintiffs allege that since defendant Gray ET AL filed papers which are “moot” and “null and void” then as a **matter of law**, defendant Gray ET AL has not met the requirements of the Alias Summons dated October 1, 2009 and therefore again is in Default ruled by judge’s Gomez and Padgett and the Circuit Court Clerk at previous times herein. Per judge Cooks own words, she cannot undermine the findings of a superior court

nor submit this case to the 2DCA also defendants guilty of malfeasance by their own words recorded now by the Referees Findings and Consent Judgement of co-defendant Heather Gray ET AL. as this 2 DCA also in 2004 remanded Gray for the same malfeasance as to which she in the “public record” Consent Judgement now admits as per the facts stated in Florida Bar Complaint #05-3977.

22.Can this Florida Supreme Court and Florida Bar Officers do “bad behavior” per Art. III, United States of America Constitution barring rendering an “incomplete” finding knowing crimes in the lower cases by Pro Se Gray ET AL and her active “sect Jeffers ET AL” co-conspirators are still being advanced against the Faith Based former Clients these “law enforcers” are to be serving honorably with Church Charity and Tax Payers funds to advance only the unequal and undue process of the “Sect Jeffers ET AL”.

23.Townsend ET AL’s case of deprivation and retaliations by Jeffers ET AL since 1995 through 2010 is again proved from Florida Senator John Grant e-mails as he was to advance the rights of the FBCCP Corporation and Members as their Registered Agent and as the tax payers representative as their Senator who until his e-mails found as responses at www.Judgeoneyourself.com are “uttering falsehoods” allegedly

assisting his clients and constituents by good behavior “under color or law” per the law and contracts and his oath to serve same.

24. Cooks January 22, 2010, Order is fraud, fraud at law, missing words, contains misspelled words and for the facts and allegations made above herein and in the Verified Complaint for which it attacks is null and void and without merit but for only to show the bias and prejudice and continuing torts of this judge and government co-agents and “others”.

25. The Florida Constitution clearly states at Article V. Section 2.(a). states: “...and requirement that no cause shall be dismissed because an improper remedy has been sought...”.

As it should be the goal of a court to do justice and handle disputes.

Clearly any justice from these years of complaints 1988-now consolidated in 06-CA-006005, herein shows a pattern of “law enforcers” numerous torts and violations of Plaintiffs Rights and Due and Equal Process Rights even connected and admitted by “judges” of these courts knowing these criminal acts against Townsend and those for whom he speaks are obstructions of justice Townsend as the FBCCP Supreme Courts Nominations Committee member, Children’s Awana Commander, Long Range Planning Committee Chairman was by contract duty bound to expose the sectarian violations of the FBCCP By-laws turned also as

criminal acts since about 1995 and still ongoing by Jeffers ET AL. using our own FBCCP Corporation Funds, Tax Dollars, and Interest on Lawyer Trust Accounts (IOLTA Funds), COURT and Attorney Fees and costs and higher insurance costs and “other expenses” to conspire and deprive intentional frauds against Plaintiffs.

The most of this “odious and outrageous” scam is use of our own kids to create “a false public light” and other defamation against naïve victims.

Concealing this first criminal act since 1995 is: the master plan; malum in se; malum prohibitum (wrong because it is prohibited); Mens rea (guilty mind) motive of Popper/Chapin/Bar Members/Jeffers/Gibbs/Grant through the Denny/Scruggs/Gray ET AL co-conspirators.

26. Plaintiffs state that this judge is using ex-parte methods and persons information not contained within the “four corners” of this Verified Complaint and states a fraud that this litigation is “...including matters that were resolved in by prior rulings of the courts (and which cases are not closed) or attempts to raise matters that are subject of prior appellate court decisions, over which this court has no jurisdiction....” And further since this action is based on actions defendants was to litigate on behalf of Plaintiffs Rights and Contracts and has failed to take actions as admitted by her **CONSENT JUDGMENT** then again this is evidence of

R.O.C.P 1.54 need for this Action by even consolidation as the violations of Plaintiffs Rights are still ongoing and subject matter for a public jury trial as the Bar co-conspirators have exhibited sufficient “scare” tactics.

27. It is another conspired fraud(s) and torts of the Constitutions and FBCCP By-laws by the “government ET AL” defendants sect Jeffers, Howlett, Corbin, Smoak, and “others” and for and to include this “check mated” judge to allege that Appeals courts have judged this case on the merits as the related cases and facts per even the Appeals courts on Orders showed that: the causes of actions stated in the Verified Complaint have legal standing; “due and equal process” by defendants has been violated; the case and related issues could not be decided on the merits because discovery was not yet done and even blocked by these defendants as is the goal of this biased judge to “impede” Plaintiffs Constitutional Rights already established by Superior Courts and even parts, deprivations and counts of this complaint written and admitted by judges or the same defendants as causes of action, proofs of frauds, needs of discovery and proof of government malfeasance against Plaintiffs as FBCCP Members, persons and citizens by other judges; that Per Se deprivations have and are still being done against Plaintiffs; for whom these Plaintiffs seek relief and restoration per the findings of these courts and a jury per their

Constitutional Right to “due process” and US Constitutional 14th

Amendment and other Amendment protections. Emphasis added.

28. Townsend in multiple 9-11 “sworn” formats has petitioned to argue these unconstitutional deprivations by “government officers” to a Grand Jury but has had no avail since the A.G.’s are biased participants with the Bar Officers in the criminal enterprise as stated trying to “conceal evidence”.

29. PER RULE OF §38.02, Florida Statue, “If the judge finds that the suggestion is true, he shall forthwith enter an order reciting the grounds of his disqualification and declaring himself disqualified in the cause” and DEMAND is made herein for this “reciting of grounds” to be produced to Plaintiff now ON THE RECORD herein and with written sworn under oath ORDER of **all reasons past, present and future** per this Statue of Rule of Law and be included herein this case file and with a copy mailed to this Plaintiff Townsend within 10 days to P.O. Box 21, Odessa, Fl 33556! Therefore, each Florida Supreme Court and 2DCA judge is hereby advised and legally noticed of their unlawful acts and served.

30. Plaintiffs reallege all points raised herein and in the Verified Complaint of September 11, 2009, as for preservation of all rights to litigation and appeal process and proof of torts to Plaintiffs Constitutional Rights as stated within all paragraphs.

THEREFORE, judge Cook is again per F.S.38 shown causes for recusal and even arrests and removal from the bench as the Appeals rulings to which she refers shows her blatant US Constitutional Article III “Bad Behaviors” assisting her co-conspirators in torts against Plaintiffs as “Whistle Blowers” seeking their Constitutional and Religious Rights and return of their children taken unlawfully by “alleged lawfully government agents ET AL” per frauds started in or about 1995 and Plaintiffs state this verified action must be reassigned and allowed to be litigated to the fullest extent of the law with Plaintiffs being restored per F.S.§960.001(1)(f) of claimants property, rights and freedoms free from undue government impeding since 1995 for Church Defendants and for Randall Townsend since the corruption of Popper began in about 1988 as concealed by the agents of the Florida Bar ET AL. and others as facts show the patterns of related facts.

Facts produced by this case and in this Brief have shown a clear “knowledge”, “willful intent” and “tort negligence” of State of Florida Officers as even the authors of the 1992 McKay Commission Report to identify the “Risks” of their own illegal actions and Intentional Fraudulent Practices violating the Florida Constitution and Rights of Citizens.

From Governor Lawton Chiles, Buddy McKay, Jeb Bush and Charlie Crist each has known of the “Risk” and had knowledge that the Citizens

have been unlawfully violated by the Judicial Branch of this State and “Others” under the Responsibility of the Florida Supreme Court Justices who had not taken or obeyed their required “Oaths” of Offices and therefore are not protected from being co-conspirators of the multiple felony crimes of these co-participants listed in this litigation. Florida Bar Executives John Harkness and John Berry and “others” in preparing this Gray Consent Judgement are “guilty” of the same “Frauds on the Court” and “violations of the same Rules of Criminal And Civil Procedure” that these participants put on Gray as they like Pavlov’s Dog “trained and rewarded” her to do to violate her contract clients.

The Contract Citizens have with these co-conspirators is called the Florida Constitution which they took an “Oath” to obey and clearly lists the obligation these co-conspirators have illegally violated.

Therefore, DEMAND is made on the Governor Elect Rick Scott and Attorney General Elect Pam Bondi and all “lawful” Government Officers to use their full powers of the Florida Constitution and Florida Laws to issue arrest warrants and fully prosecute per the law the co-conspirators as shown herein and “others Doe” that are exposed when Respondent Townsend’s Discovery per his F.S. §617 lawful duties are allowed per the law and grant this Writ of Habeas CORPUS to restore all citizens from unconstitutional

detainment. Plaintiffs make all claims to be made whole by defendants.

Plaintiffs also request that a new and neutral judge rule on Plaintiffs Motion of January 8, 2010 as filed in case 06-6005, grant discovery and injunctions requested and stop the extortion, ransom, kidnapping, interference with child custody and frauds by defendants on innocent children, a church/school and tax payers! Defendants should not profit in deprivations done to our kids and the citizens they still fraud and deprive!

PORTION OF FLORIDA BAR SWORN COMPLAINT #05-3977
THROWN IN THE TRASH BY FLORIDA BAR TAMPA OFFICE
AGENTS WHOSE OFFICES ARE LOCATED AT TAMPA
INTERNATIONAL AIRPORT WHICH IS IN FEDERAL PROPERTY

“...**MAJOR POINT---**WHEN I TOOK OVER AS PRO SE THE ACTS DONE BY THE FORMER WIFE AND BY STACEY TURMEL AND HAD NOW INVOLVED STANFORD SOLOMON EVEN THOUGH HIS TESTIMONY TO JUDGE GOMEZ WAS THAT HE WOULD HELP ME LEARN HOW TO CONTACT MY KIDS AND TO LEARN WHO THEIR MEDICAL DOCTORS WERE SO I COULD HELP THEM BUT INSTEAD SOLOMON WORKED TO BLOCK ME FROM MY DAUGHTER AND DISCOVERY OF THE EVIDENCE OF HER BEING ABUSED BY THE MOTHER AND THE CHURCH SCHOOL EMPLOYEES WAS A VIOLATION OF THE FLORIDA RULES OF CIVIL PROCEDURE AND NOT ALLOWING IN EVIDENCE THAT PROVES THE FRAUDS BY THE DEFENDANTS AGAINST ME. THE PROPER TESTIMONY OF THE DAUGHTER AND SON WILL PROVE THE FRAUDS OF THE MOTHER, THE ATTORNEYS AND THE CHURCH /SCHOOL AS THESE KIDS HAVE BEEN VIOLATED! PER R.O.C.P 4-3.4(a) ALL ATTORNEYS AND JUDGES, DEFENDANTS AND DOCTOR LYNN, HAVE “(a) UNLAWFULLY OBSTRUCTED ANOTHERS PARTY’S ACCESS TO EVIDENCE.” THE DAUGHTER AND SON IS EVIDENCE OF THE ABUSE THIS PRO SE FATHER IS TRYING TO REPORT, STOP AND REPAIR NOW SINCE 1995.

A. ACTS TO INVESTIGATE OF HEATHER GRAY

RULES OF PROFESSIONAL CONDUCT VIOLATED ARE:

RULE 4 –SUBPARTS FLORIDA STATUES 777 Conspiracy, 836.05 Extortion, 837 Perjury, 843 Obstruction of Justice, 895 RICO, 914.13 and 914.22 and 914.23 Perjury and Witness tampering EXTRINSIC FRAUD AND FRAUD ON THE COURT.

Complainant herein alleges all facts as stated in MOTION FOR REHEARING, filed October 1, 2003, to the court of Judge Timmerman putting Heather Gray on notice.

Heather Gray was hired as early as **March 14, 2003**, at a dinner meeting and paid a retainer check when Scruggs advised I would need her services as he did not do appeals. She was paid a \$1,000.00 check as retainer and given full details of the case at dinner. ACCORDING TO SCRUGGS ADVICE AND CONTROLS OF THE ISSUES STILL BEFORE JUDGE TIMMERMAN TO GET THE REHEARING AND TURMEL TO DO HER PART, I COULD NOT HAVE HEATHER DO THE APPEAL SOONER DUE TO SCRUGGS AND TURMEL DRAGGING OUT NOT EVEN DOING THEIR DUTIES FOR APPEAL OF JUDGE TIMMERMANS RULING. I EVEN WANTED A GUARDIAN AND CUSTODY OF MY DAUGHTER RIGHTS APPEALED AND SCRUGGS AND I DISCUSSED WITH HIM THAT “WHAT ARE THEY WAITING FOR, HER TO TURN 18, SO I CANNOT HAVE THE COURT ORDER HER FOR COUNSELING?” HE NEVER ANSWERED!

After the September 2003, meeting when Scruggs was fired, Heather was contacted and advised to get the appeal ready for the court immediately. We had the draft then that Turmel was sending to the court. I was advised by her to represent myself on the other matters and she would just handle the appeal. We spoke often to keep her updated and I even gave her the details of my trying to file the NOTICE OF APPEAL OF THE FINAL JUDGEMENT and my meetings with LYNN MEEHAN, Court Administrator. HEATHER DELAYED STARTING AS FAST AS I WANTED HER TOO AND BLAMED SCRUGGS FOR NOT TELLING HER WHAT WAS DONE IN THE SEPTEMBER 22, 2003, or thereafter hearing that I had not been allowed to attend. **HEATHER GRAY NEVER FILED A NOTICE TO APPEAL THE AMENDED JUDGEMENT!** AT HER DIRECTIVE I SIGNED HER EMPLOYMENT CONTRACT AND DID NOT BACKDATE IT BACK TO MARCH 14, 2003.

HER FEBRUARY BILLING REPORT SHOWS THAT BETWEEN FEBRUARY 3, 2004, and FEBRUARY 12, 2004, numerous phone calls had

to be made to the J.A. Annice Gunn and to me her client and to opposing counsel as she did get involved in the hearing with Judge Gomez as the unethical conduct and fraudulent conduct by Stacy Turmel had my hearing with Judge Gomez cancelled and Stacy Turmel would not return phone calls. All along Heather advised me she was working on getting the appeal written. All along she advised me that she was trying to learn what actually happened in the September 22, 2003 hearing (which I told her what happened as I was there and ready to do my affidavit) and the SEPTEMBER-DECEMBER hearings done EXPARTE before Judge Timmerman but since there was no transcripts, she stated that Scruggs and Turmel were not talking to her or talking to me as we later learn to unravel their ongoing criminal exparte conspiracy acts with the Judge. She then started her stalling and she also then blamed the moving of the courthouse as delaying the court getting the file ready for the Appeals Court Records as she wrote in one letter. Heather Gray then never got the appeal filed and the case was dismissed before I could correct her negligence brought on by her trying to protect what she learned was the malpractice of Scruggs and Timmerman and Turmel. I asked her several times how she was coming with the appeal and get around not showing the frauds by Scruggs and Turmel and Timmerman. She never answered the question until by her actions to not file the appeal and she stopped returning my phone calls. She wasted out my retainer letting Scruggs and Turmel and Solomon practice their stalling tactics. I told her to help me request and file for SANCTIONS on Scruggs and Turmel and Solomon to get the legal fees covered and she told me to write those, WHICH I DID only to have Judge Sierra IGNOR THEM and release Solomon without even reading my paperwork or listening to my points in the hearing as the transcript confirms. SIERRA'S PREJUDICE WAS OBVIOUS!

The \$1000.00 paid to Heather Gray in March 2003, per what she said should easily have got the appeal done for this "simple" case she said! I now see that her not filing the NOTICE OF APPEAL OF THE AMENDED JUDGEMENT as another complaint of the frauds she did to me while she was covering for Scruggs malpractice. These at least six drafts and signing of the judgements were not even sent to me by the attorneys or judges while I was pro se as another proof of the conspiracy to fraud me and not expose their crimes or appeal their crimes timely. HER LETTER AND PHONE CALL SAID FOR ME TO PAY HER ADDITIONAL MONIES AND THAT SHE WOULD FILE FOR AN EXTENTION TO ONCE AGAIN DELAY THE HEARING ON THE APPEAL SINCE SCRUGGS AND TURMEL WERE STILL NOT

TALKING. SHE THEN TOLD THE APPEALS COURT DIFFERENT THAN HER LETTER AND OUR AGREEMENT BECAUSE SHE SENT THEM A RESIGNATION LETTER AND ALSO DID NOT IT APPEARS FILE FOR THE EXTENTION SO THE APPEAL WAS DISMISSED AND NO REVIEW OF ALL THE CRIMINAL ACTS WAS DONE WHICH TO A JURY WILL LOOK LIKE SHE BECAME PART OF THE CONSPIRACY! THIS IS CONFIRMED IN HER MAY 23, 2004 LETTER STATING THE HEARING FOR MAY 24, 2004, HAD BEEN CANCELLED AND SHE WAS GOING TO FILE FOR AN EXTENSION! EVEN BEFORE I COULD WASTE MORE MONEY AND GET HER A CHECK TO ALLOW HER TO CONTINUE TO STALL SHE HAD THE APPEAL DISMISSED BECAUSE OF HER INSIDE CONNECTIONS AS SHE BRAGGED ABOUT WHEN I HIRED HER ON HER CONTACTS WITH THE APPEAL COURT!

NOW LOOKING BACK SHE HAD TOO MANY TIES WITH AND LOYALTIES WITH SCRUGGS AND THE GOOD OLD BOY NETWORK AND GOT CAUGHT BY ALL THE LYING TO HAVE WRITTEN A FAIR APPEAL IN THE FIRST PLACE.

SHE DID NOT NEED THE HELP OF SCRUGGS OR TURMEL AS THE TRAIL OF CONDUCT AS SEEN JUST ON MY PAPERWORK COLLECTED HEREIN IS SUFFICIENT PROOF TO SHOW THE ANGER OF THE JUDGE AND THE CONNIVING AND DECEPTIONS WITH THE OVER 6 ATTEMPTS AT THE FINAL AND AMENDED JUDGEMENTS AND THE DECEPTION AND ABUSE ON THE KIDS AND THE DECEPTION ON THE SALE OF THE HOME AND ALL THE TRANSCRIPTS SHE HAD MORE THAN SHE NEEDED!.

SHE WANTED OUT AND SHE LIED TO ME AND TO THE APPEALS COURT TO GET OUT! SHE DID NOT SEND TO ME HER RESIGNATION LETTER AS SHE SENT TO THE APPEALS COURT BUT NOTE THEIR WORDING OF THEIR DISMISSAL ORDER AND IT PROVES HER PLAN!

HEATHER GRAY WAS AT THE HEARING WITH JUDGE GOMEZ ON MARCH 29, 2004 AND HEARD THAT HE WAS GOING TO ALLOW THE APPEAL TO CORRECT THE ERRORS MADE BY TIMMERMAN AND THEN HIS COURT WOULD THEN GET JURISDICTION BACK FROM THE APPEALS COURT AS WE ALL HAD DISCUSSED WHAT ANNICE GUNN TOLD US HOW THE JUDGE WAS SO UPSET ‘OFF THE RECORD’ WITH WHAT HE HAD READ HAD HAPPENED! The transcript will confirm that Judge

Gomez showed his adversity to the Judge Timmerman ruling but the Appeals court had jurisdiction he alleged.

It is my position and I believe it can be proved with the supporting evidence that upon learning the issues and the position by Judge Gomez as to how he felt the file showed proof that the case should be overturned by the Appeals court that had my Appeal be sent to the Appeals court and they reversed the orders of Judge Timmerman that this entire coverup and conspiracy by Defendant, Turmel, Scruggs and Timmerman would require that these attorneys and Judge be disbarred for all the frauds that were done. AND NOW IT SHOULD LEAD TO THE OTHER ATTORNEYS AND JUDGES THAT HAVE DONE THE CONTINUING FRAUDS AND HARMS TO ME AND MY KIDS.

Judge Gomez and Judge Sierra can see that Heather Gray nor Scruggs had filed the NOTICE OF APPEAL OF THE AMENDED JUDGEMENT and this also shows that Scruggs was not cooperating with me or Heather Gray to keep my interests protected but was proof of covering his EXPARTE actions.

MY MOTIONS FOR EXTENTIONS OF TIME TO THE APPEALS COURT SHOW THAT MY ATTORNEYS AND STACEY TURMEL WERE IN VIOLATION OF THE RULES OF CIVIL PROCEDURE BY NOT RETURNING PHONE CALLS AND NOT SENDING ME DOCUMENTS AS A PRO SE.

THE MOTION FOR EXTENTION OF TIME, sent by Heather Gray to the Appeals Court June 4, 2004, is great proof of the actions of TURMEL to never return phone calls as she did to ignore me during all of 2002-2003 while I was PRO SE and she knew her bias and prejudice with the court would call my actions a lie as Timmerman did against this Pro Se. Included in these court records also are letters(February 26, 2004; April 6, 2004 to Turmel and one to Solomon) from Heather Gray that were sent to Turmel and to Solomon showing numerous requests for information and the confirmation of what Stanford Solomon agreed to outside the court on March 29, 2004, regarding the status of my kids health and how I could reach their doctors.

**SOLOMON ADVISED ME HE WROTE TO THE FORMER WIFE AND REQUESTED THE INFORMATION ON THE CHILDREN!
REQUESTING THIS INFORMATION OUTSIDE THE COURT OF JUDGE GOMEZ IS WHAT CAUSED THE GRANDFATHER DON HARROD TO TRY TO ATTACK THIS FATHER AND STANFORD SOLOMON AND HEATHER GRAY HAD TO GET INBETWEEN THE**

GRANDFATHER AS HE STARTED TO COME AT ME TO ATTACK ME!

SOLOMON HAD AGREED TO GET US THIS INFORMATION EVEN THOUGH IN HIS THREAT LETTER IN SEPTEMBER 24, 2004, HE CLAIMS HE NEVER MADE THIS PROMISE! SOLOMON IS A PURE LIAR AGAIN WITH THE WRITTEN PROOFS TO JUDGE GOMEZ, TO JUDGE SIERRA AND TO HEATHER GRAY AND MYSELF!

SUMMARY POINT:

- **IT IS MY POSITION THAT HEATHER GRAY INTENTIONALLY DID NOT APPEAL THIS CASE AS TO ASSIST IN THE COVERUP AND PROTECT ATTORNEYS AND JUDGES.**
- **SHE NEVER FILED A NOTICE OF APPEALS OF THE AMENDED JUDGEMENT!**
- **AS PROOF NOTE HER OWN EXHIBITS PRESENTED IN THE JUNE 4, 2004, MOTION FOR EXTENTION TO THE APPEALS COURT AND WHAT IS MISSING FROM HER PRESENTATION IS A LETTER OR MENTION THAT SCRUGGS WAS ALSO NOT ALLOWING INFORMATION TO RECREATE THE FILE ON WHAT HE DID IN SEPTEMBER 22, 2003 HEARING NOR HIS PARTICIPATION IN THE OCTOBER 1, -DECEMBER 2003,**
- **NOR IS MENTION FROM HER AS SHE TRIED TO DODGE IT WHEN SHE HEARD SCRUGGS EXPARTE CONDUCT WITH JUDGE GOMEZ.**
- **SHE KNOWS HIS VIOLATIONS REQUIRE HIM TO BE DISBARRED AND SHE DID NOT PLAN TO CONNECT THE EVIDENCE THAT SHOWED HE WAS CRIMINAL TOWARDS HIS CLIENT AND THE COURTS!**
- **SHE LIED TO ME THAT THE APPEAL WAS READY TO BE FILED AND YET SHE HAD NOT SHOWN ME THE DRAFT AS SHE AGREED TO DO DURING THE PROCESS!**
- **SHE SOUGHT WITHDRAWAL LEAVING ME NO TIME TO GET THE APPEAL CASE FILES AND EVIDENCE FOR THE APPEALS COURT DUE TO HER STALLING TO COVER FOR THE CRIMES OF SCRUGGS AND TURMEL AND TIMMERMAN AND SOLOMON AND THEN HERSELF AND JUDGE GOMEZ.**
- **SHE AFTER AGREEING TO HELP ME GET CONTACT WITH MY KIDS PER HER LETTER WRITTEN TO SOLOMON SHE**

**THEN IGNORED MY PLEAS TO HELP MY KIDS EVEN
THOUGH SHE WITNESSED A VIOLENT ACT OUTSIDE THE
COURT OF JUDGE GOMEZ BY DON HARROD THE
GRANDFATHER OF MY KIDS!**

- **THE IS PART OF THE CRIMINALS THAT CONTINUE THE
ABUSE ON MY KIDS AND FOR THIS EVEN HER BEING A
MOTHER SHE SHOULD UNDERSTAND MY GRIEF AND THE
GRIEF OF MY KIDS AND OUR ABUSE AND SHE DID
NOTHING BUT BURY EVIDENCE.**
- **SHE WAS TOLD AND MANY TIMES SHOWN MY MOTIONS
AND EMERGENCY PETITIONS OF ALL THE CASES OF THE
DIVORCE AND OF MY APPEAL ISSUES AGAINST THE
CHURCH AND THE ISSUES IN THE MOTIONS BEFORE
JUDGE CRENSHAW FOR HER ALLEGED PREP OF MY ISSUES
AS RELATED FOR THE DIVORCE APPEAL!**
- **I FIND NO EVIDENCE WHERE SHE NOTIFIED THE APPEALS
COURTS OR THE FLORIDA BAR OR THE JUDICIAL
QUALIFICATIONS COMMITTEE OF THE VIOLATIONS
STATED HEREIN FOR WHICH SHE BECAME AN
ACCOMPLICE AND SHE HAD A DUTY TO REPORT LAWYERS
AND JUDGES FOR THE CRIMES AND VIOLATIONS AS
STATED IN THIS REPORT PER THE TESTIMONY OF
STANFORD SOLOMON AND MYSELF! SHE BECAME A
CRIMINAL WITH THEM!
SHE MUST BE DISBARRED!**

ACTS TO INVESTIGATE OF JUDGE PALOMINO

RULES OF PROFESSIONAL CONDUCT VIOLATED ARE:

RULE 4 –SUBPARTS

Judge Palomino was very wise in the hearing of cases 01-15813 and 01-15814 but my only concern was that when he was sent by the Sheriff's Department and my letter showing the complaint showing how Beck had given two false statements on the Affidavit to get the temporary injunction Judge Palomino never did nothing to my knowledge and based on Scruggs saying he would discuss this with the Judge something should have been done on the fraudulent statements in the Affidavit and even more once this unveiled with hard evidence Beck would lie to the Judge.

Judge Palomino was sent the photo's of my high school football team picture showing Beck and myself and also showing Beck and myself in the GASPARILLA Parade standing by the float. We have known each other

since the 1970's but BECK LIED IT WAS 1990's when he returned to be the Church/School pastor. This is to prejudice the judge that Beck only knows me as a pastor and not as a friend he had betrayed and had know of my character and integrity for over 20 years!

Beck also knows my path to work allowed me to pass right by the School and My needs to be a dad to my kids and protect them from the still continuing abuse conduct by the pastors and teachers due to the lies Beck was telling his employees and sheriff deputies to practice against me for no reason!

NOT DOING NOTHING LET BECK, KARENS AND SCRUGGS FRAUDS CONTINUE TO DAMAGE ME AND MY KIDS WHO HE AS A FAMILY JUDGE SHOULD KNOW HIS COURT MUST DO TO PROTECT AND HAD SANCTIONS AND INJUNCTIONS AND BENCH WARRANT OPPORTUNITIES BASED ON MY REPORTS THIS WAS A SHAM!

I alleged that it is very probable that Scruggs got Palomino to ignore my follow ups about the frauds done by Beck and Karen to cover up for Scruggs frauds by not present the full case before Judge Palomino on November 15, 2001.

IF he had EXPARTE contact with Scruggs after Judge Palomino knew I was pro se trying to inform him of the frauds and then also to get my property back after the case was dismissed then he violated several Canons!

ACTS TO INVESTIGATE OF JUDGE TIMMERMAN

RULES OF PROFESSIONAL CONDUCT VIOLATED ARE:

RULE 4 –SUBPARTS AS A JUDGE HE IS ALSO TO ACT AS A LAWYER AND KNOWS THE RULES THAT HE AND THE ATTORNEYS UNDER HIM IN HIS COURT ARE REQUIRED TO FOLLOW. BUT THE ACTIONS HEREIN WILL SHOW HE DEFILED HIMSELF, THE LITIGANTS, THE ATTORNEYS AND THE COURT.

RULES OF JUDICIAL ADMINISTRATION RULE 2.160

JUVENILE PROCEDURE RULE 8.675—Timmerman should have required the mental exam of the mother and daughter due to the issues of this case with even what was presented to him.

CODE OF JUDICIAL CONDUCT

CANONS: I; II A; II B; III A(1); III A(2); III A(3); III A(4); III A(5); III B(1); III B(2); III B(3); III C(1)(a); III C(1)(b); III C(1)(c); III C(1)(c)iii; III C(1)(c)iv;

FLORIDA STANDARDS FOR IMPOSING LAWYER SANCTIONS:

1.1; 1.2; 1.3; 2.1; 2.2; 2.4; 2.5; 2.8; 4.11; 4.21; 4.31(a); 5.11(b); 5.11(e); 5.11(f); 6.11; 6.32; 7.1; 9.22(b); 9.22(c); 9.22(d); 9.22g-j; 12.1(b) AS EVIDENCE OF THE ACTS OF MISCONDUCT PLEASE NOTE:

(1) **MOTION FOR REHEARING** submitted on October 1, 2003, to the court of Judge Timmerman. **NOTE THAT JUDGE TIMMERMAN DENIED THIS MOTION and the OCTOBER 10, 2003, DENIAL ORDER OF THE JUDGE IS EVEN MAILED BY HIM TO THE ATTORNEYS TURMEL AND THE TERMINATED SCRUGGS SO ALL HAD FULL KNOWLEDGE SCRUGGS ACTIONS WERE STOPPED and then still did his acts in conspiracy with Scruggs despite the first line of this motion stating, “COMES NOW RANDALL TOWNSEND, NOW PRO SE, now having immediately fired, Respondent’s former attorney, Charles H. Scruggs, III Esquire, for reasons the court is already aware from pointing out in verbal testimony and from evidence...”.**

(2) **WHEN I TRIED TO GET MY NEXT STEP A MOTIOIN FOR PROTECTIVE ORDER AND INJUNCTIVE RELIEF**, Judge Timmerman would not grant a hearing and the deceptions began that his being reassigned stopped me getting the hearing yet Turmel and Scruggs got their deceptions through due to their conspiracy to cover up their crimes.

(3) **JUDGE TIMMERMAN ENTERED THE COURT ROOM ON JANUARY 30, 2003, ALREADY UPSET AND PREJUDICED AND BIASED AGAINST THIS RESPONDENT HUSBAND AND THEN HIS ANGER GOT WORSE WITH THE FRAUDS OF THE ATTORNEYS.**

(4) Judge Timmerman is the most out of control judge I have seen verses about 20 other judges I have argued cases before and every word out of my mouth to him started a vile attitude and prejudice. I QUESTION THAT SINCE HE HAD JUST COME FROM A DOCTOR THAT MAYBE HIS PAIN AND MEDICATION WAS AFFECTING HIS ABILITY TO LISTEN AND NOT BE SO ARGUMENTATIVE!

(5) **ONCE ONE TAKES FROM JUDGE TIMMERMAN THE FIRST FRAUD THAT HE HAD BLAMED AGAINST THIS FATHER/HUSBAND THAT SCRUGGS WAS NOT PREPARED BECAUSE SCRUGGS DECIDED TO NOT BE PREPARED FOR OVER A WEEK AND THAT HE NEVER INTENDED TO DEFEND HIS CLIENT BASED ON HIS FOLLOWUP ACTIONS, THEN THE ENTIRE BIAS AND FRUSTRATION OF THE JUDGE**

MUST GO TO THE ATTORNEY AND THE RULES OF CIVIL PROCEEDURE DO NOT ALLOW FOR A CLIENT BEING PUNISHED DUE TO THE ILLEGAL CONDUCT AND MALPRACTICE BY THE ATTORNEY!

BASICALLY, THE JUDGE TRYING TO DO THE DIVORCE AT THAT TIME AS QUICKLY AS HE DID WITH EVERY ORDER THAT HE MADE AS HOSTILE AS HE ACTED WAS MY SANCTIONED PUNISHMENT WITH HIS WRATH DUE TO THE FRAUD BY SCRUGGS THAT HE CHOSE NOT TO PRESENT A DEFENSE AND NOT BECAUSE HIS CLIENT WAS ALSO DEMANDING HE BE MORE PREPARED AND USE THE EXHIBITS HE HAD IN HIS BRIEFCASE!

THE FACT THAT THEN THROUGHOUT THE ENTIRE YEAR THEN THIS IS PROOF THAT HE CONTINUED HIS WRATH ALL YEAR AND EVEN THE ACTIONS AFTER THE MOTION FOR REHEARING SHOULD HAVE PROTECTED THIS FATHER FROM ADDITIONAL DAMAGES AND NOT THEN PUNISH ME BY MAKING ME SELL MY HOME AND DOING THIS BEHIND A PRO SE'S BACK!

(6) The next series of events was the argument by Scruggs that he wanted an extension and that exchange in the transcript shows where many frauds based on the facts above in the Scruggs section show that Timmerman was outraged even more against this respondent husband due to the frauds by Scruggs. Judge Timmerman refused to listen and if he heard what Palomino, Arnold and Crenshaw knows based on their listening then it went in my favor as the real victim.

(7) Much of what I was entrapped to do to prepare for this Divorce action that **according to the wife up until the week before the hearing was to be cancelled as out of one side of her mouth she was saying “just show me proof of what Beck did and maybe we can reconcile”**. And this is what I was trying to do with the lawsuit against the alleged pastor and the damages of the church was in the case of Judge Arnold and that hearing did not happen until January 21, 2003.(Transcript available) Note that in that hearing was requested Discovery and Requests for Protection for my kids as with this information finally I could present these “TRUTHS” on paper to the wife and hopefully prove to her I was not lying about the evil of the church and pastors and **THUS SAVE MY MARRIAGE AS KAREN WAS TALKING OUT OF BOTH SIDES OF HER MOUTH AND IN DECEMBER 2002 SAID SHE WAS THINKING ABOUT CALLING OFF THE DIVORCE! I THOUGHT**

IT IS BECAUSE HER MOTHER AND BROTHERS WON'T LET HER BECAUSE AS KAREN TOLD ME IN OCTOBER 1999, "**HOW CAN YOU BE SO RIGHT AND ALL THESE OTHER MEN BE SO WRONG?**" NOW OVER 5 YEARS LATER MY BEING RIGHT IS OVER 98% OF EVERYTHING I WAS ADVISING REGARDING THE ACTS OF KAREN BEING ILLEGAL AND THE ACTS OF THE PASTORS BEING FRAUDS. Counseling would help the marriage after we got past the crimes she has caused. SCRUGGS AND I DISCUSSED THIS STRATEGY AND HE DID NOTHING! Now I can realize Scruggs saw my actions with Judge Arnold and Judge Crenshaw telling the truth a threat to him and his misconduct.

- (8) THE ATTORNEYS WITHHOLDING THE EXTENT OF THE MEDICAL CARE THAT THE DAUGHTER AND SON NEEDED AND STILL NEED WAS A FRAUD TO THE COURT AND PROVED THE POSITION THAT JUDGE TIMMERMAN EXPLODED ON THIS FATHER THAT THE CHILDREN WOULD BE REQUIRED TO GET EXAMS FOR PRIOR CONDITIONS IN ORDER TO GET INSURANCE WAS MERITED AS SHOWN IN THE TRANSCRIPT OF JANUARY 30, 2003, on page 58. Over a dozen reasons can be proved as to why medical and mental evaluations on the former wife and children are necessary and a court order to honor the request of this father/husband was the civil action to take.
- (9) NOTE SCRUGGS TESTIMONY TO THE COURT IN THE JANUARY 30, 2003, TRANSCRIPT ON PAGE 8 LINE 17, AS A PURE DECEPTION ON THE COURT ALLEGING, "I just wonder about my status with the bar association representing a man in trial that I have not had a chance to prepare for." And this is confirmed as a pure fraud that further angered the judge at the client.
- (10) Later Judge Timmerman with knowledge as stated in the **MOTION FOR REHEARING**, had a duty to know his prejudice against and punish the client for the frauds the attorney did and Timmerman had a duty to overturn his rulings and also to report Scruggs to the Florida Bar but this is proof of their collusion to protect each other at the expense of Justice, the family and this complainant.
- (11) **JUDGE TIMMERMAN ALSO HAD FULL KNOWLEDGE THAT HE DID NOT EVER HEAR EVIDENCE AS TO THE OWNERSHIP OF THE HOME AND THE NEED TO SELL THE HOME AND WITH FULL KNOWLEDGE THAT I WAS A PRO SE WITH A LOT OF EVIDENCE HE WAS REFUSING TO HEAR AND MULTIPLE COURT FILES HE DID NOT READ BY HIS**

OWN ARROGANCE AND STUPIDITY HE DID THE EXPARTE ACTIONS BEHIND THE BACK OF THIS PRO SE AND REVIEWED MANY VERSIONS OF A JUDGEMENT AND SIGNED THE FINAL AND THEN THE AMENDED JUDGEMENTS WHILE HIS JUDICIAL ASSISTANT WAS LYING TO BE THAT THE JUDGE WAS PAST THIS CASE AND NOT HEARING ISSUES! THE FINAL JUDGEMENT AND THE AMENDED FINAL JUDGEMENT AND THE GARNISHMENTS AS A MATTER OF LAW ARE NULL AND VOID AND EVIDENCE OF FRAUD BY TIMMERMAN, SCRUGGS AND TURMEL AS PER THE LEGAL AID OFFICER!

(12) NOTE BELOW THE OCTOBER 1, 2003 through mid 2004

evidences of actions done by Timmerman in his conspiracy to act fraud!

HOW TIMMERMAN VIOLATED HIS CANONS:

I—Judge Timmerman has on the wall outside of his office a sign that says **NO DIVORCE UNTIL: (1) Counseling sessions and a certificate when minor children are involved. (2) Mediation Certificate.** And allegedly these are State Law requirements. **SO then Timmerman violated his own self and rules** and also continued the harm done on my kids as victims to the abuses by the former wife and these alleged pastors! This again showed his bias and overlook his warnings and my request for counseling for the kids and the former wife which would let everyone know if this was dealt into that the real lies were from the actions by the wife and I have not caused this as they allege. This would also have showed Scruggs had done malpractice in the 2001 matters which bond again another reason Scruggs and Timmerman had to violate the law in their conspiracy. Had the judge listened properly to the testimony of the abuse of the kids then he would have not retaliated against my statement of the insurance questions and my son was a witness to my many attempts to provide insurance for them. His cutting off my answers every time even made it more obvious to not try to represent myself as all this judge did every time was want to argue at me! I said nothing to aggravate him other than saying, **YOU DON'T KNOW WHO MY COUNSELORS ARE! AND NOR ARE THEY ALL REVEALED IN THIS REPORT HEREIN AS IT IS NECESSARY FOR ALL INVOLVED TO JUST DO THEIR JOB ETHICALLY AND NOT WORRY ABOUT TRYING TO PLEASE PEOPLE IN THE CONSPIRACY TO CONTINUE THESE FRAUDS DONE TO ME AND MY KIDS!**

*****JUDGE TIMMERMAN SHOULD HAVE BEEN TOLD MY SCRUGGS THAT KAREN NOT WANTING COUNSELING AND THE**

KIDS NOT GETTING COUNSELING WOULD LEAD TO MORE INFORMATION FOR HER TO BE BLAMED FOR AS EVEN ILLEGAL AND THE KIDS DO NOT WANT THEIR MOTHER TO GO TO JAIL BUT THEY ARE SCARED AND LIED TO ENOUGH THAT THEY DO NOT KNOW THEIR MOTHER AND PASTORS ARE STILL TRYING HAVE THIS FATHER PUT IN JAIL FOR YEARS TO COVER FOR THEIR CRIMES!

INSTEAD JUDGE TIMMERMAN PLAYED UP TO THE WOMEN EVERY TIME HE COULD!

The entire transcript of the January 30, 2003 hearing is proof of improper conduct and abuse on me and my kids as victims to the abuse and lies of the mother and her attorney.

Then on the conduct after OCTOBER 1, 2003, after Scruggs was fired and my **MOTION FOR REHEARING** informing Timmerman that Scruggs was “**FIRED**” was denied by the court and ignored my rights PRO SE or still as allegedly represented by Heather Gray, by Timmerman still writing multiple DIVORCE INJUNCTIONS NOT INCLUDED IN THE TRIAL ACTIONS FROM 11 MONTHS EARLIER AND THAT THE KIDS WERE NOW ADULTS this show this is not an Honorable Judge but a weak man out of control, thinking he is a judge using his powers to continue the Criminal Enterprise for his co-participants.

ONCE TIMMERMAN FOUND OUT THE TRUTH THAT SCRUGGS HAD LIED AND HE REALLY HAD NOT JUST BEEN HIRED “TWO DAYS BEFORE” AND SCRUGGS KNEW MORE THAN HE WANTED TO TELL BECAUSE OF HIS “ALLEGED PERSONAL CONVICTIONS” THEN WE HAD MULTIPLE CAUSES TO HAVE THE CASE RETRIED BASED ON SCRUGGS MALPRACTICE AND THE JUDGES OWN BIAS AS HE WALKED IN THE ROOM AND HEARD THE LIES FROM TURMEL!

There was no decent and honorable conduct out of this court....”

CONCLUSION

Citizens demand and expect all our Vested Contract Rights be restored and honored per our Law.

CERTIFICATE OF FONT

I HEREBY CERTIFY that the size and style of type used in this brief is 14 point Times New Roman.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to judge Martha Cook and to the Clerk of the Circuit Court 800 E. Twiggs St. Tampa Florida and to Heather Gray, 10011 Cannon Drive Riverview, Florida 33578, and to the 2DCA Clerk and by U.S. Certified Mail to each justice of the Florida Supreme Court and to the Office of the Governor Elect Rick Scott and Office of the Attorney General Elect Pam Bondi, this 23-24 days of December, 2010.

Respectfully Submitted as for all Appellants by,
Randall C. Townsend, Pro Se, Per F.S. §617
P.O. Box 21, Odessa, Fl. 33556
(941) 350-2677
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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.

SIGNED: RANDALL C. TOWNSEND _____
WITNESS MY HAND AND OFFICIAL SEAL THIS ____ DAY OF _____, 2010, BY ID PRODUCED _____
NOTARY PUBLIC: _____