

IN THE DISTRICT COURT OF APPEALS OF
THE STATE OF FLORIDA, SECOND DISTRICT

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 Daughter J.G.T.)
AND AS A DIRECT MEMBERS)
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” ET AL)
APPELLANT/Plaintiffs)
v. HEATHER M. GRAY, Individually, HEATHER M. GRAY,
ATTORNEY AT LAW, HEATHER M. GRAY, P.A. A FLORIDA
CORPORATION, ET.AL.) AS
APPELLEE/Defendants. /

2DCA APPEAL: 10-774

CIVIL ACTION COMPLAINT
CASE NO:_ CASE NO: 06-6005

INJUNCTIVE RELIEF SOUGHT

CLAIM FOR CLASS ACTION

JURY TRIAL DEMANDED

**ON REVIEW FROM THE HILLSBOROUGH COUNTY
CIRCUIT COURT OF MARTHA J. COOK, TAMPA, FLORIDA**

APPELLANT’S INITIAL BRIEF

Randall Townsend PRO SE ET AL
P.O. Box 21, Odessa, Fl 33556
941.350.2677 Jfyr59@hotmail.com
www.Judgeoneforyourself.com

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

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)

CIVIL ACTION COMPLAINT
CASE NO: _ CASE NO: 06-6005

JURY TRIAL DEMANDED

INJUNCTIVE RELIEF SOUGHT

CLAIM FOR CLASS ACTION

FLORIDA CORPORATION,)
And Co-Defendants as)
RONALD L. BECK,)
(a.k.a. Ron Beck) Individually,)
REVEREND RONALD L. BECK,)
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., Individually, CHARLES H. SCRUGGS, III. ESQUIRE, As attorney at law/ former Circuit Judge CHARLES H. SCRUGGS, III, P.A., A Professional Association Law Firm,	CIRCUIT CASE NO. 05-0911 DIVISION G APPEALS CASE:2D06-2811
--	---

KAREN HARROD TOWNSEND, Individually, KAREN HARROD TOWNSEND AS EMPLOYEE OF (CPCS) OF THE FBCCP	CASE NO 05-9605 Civil 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
--	---

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 PROCEDURES
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 BIRKHOLO, 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,

TABLE OF CONTENTS

Table of Contents	11
Table of Authorities	12
Statement of the Issues	14
Statement of the Case	19
Statement of the Facts	23
Arguments and Citation to Authority	26
Standard of Review	56
Conclusion	56
Certificate of Font	59
Certificate of Service	60
Affidavit of Appellant	60

Table of Authorities

Private Securities Litigation Reform Act of 1995 (“PSLRA”)

Aisenberg v. Hillsborough County Sheriff’s Office et al. 325 F. Supp.2d 1366 (M.D.Fla.2004) by Judge Merryday

F.S. §617 ALL and F.S. §617.0304 Representative Townsend sought since about 10/1995 or before at the request of members to “enjoin an unauthorized corporate act” but was and is prohibited by deputies Jeffers and Howlett et al. still acting in violation of the By-Laws. Florida Statutes 617.0834 infers 1. the violations of “Criminal Laws” “estops that officer or director from contesting the fact that his or her breach, or failure to perform, constitutes a violation of the criminal law...” “2. A transaction from which the officer or director derived an improper personal benefit, either directly or indirectly” or 3. “Recklessness or an act or omission which was committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.” Are grounds for investigation and potential criminal or civil charges for violations of Criminal laws or the BY-LAWS.”

“Florida Statutes 617.0835...may not...(2)(a) Engage in any act of “self-dealing,” as defined in s. 4941(d)...”

PER Wests F.S.A. §95.031, LIMITATIONS OF ACTIONS ¶ 43

“A statute of limitations runs from the time the cause of action accrues which, in turn, is generally determined by the date when the last element constituting the cause of action occurs.”

Securities Exchange Act of 1934-Section 10(b) and Rule 10b-5-Reliance

F.S. §775.03 Unlawful Benefit to Clergy,

F.S. §26.49 as Sheriff is Executive Officer of the Court

Kaisner v. Kolb 543 So.2d 732, 1989 Fla. SCt 2682 and F.S. 768.28.

Report of Attorney General Bob Butterworth AGO 96-41

Pellegrini v. Winter 476 So2d 1363 (Fla.App.5 Dist. 1985)

Rotella v. Wood 528 U.S.549, 560, 120 S. Ct. 1075, 1083-1084, 145 L.Ed Sd 1047, 1058, R.I.C.O. Bus. Disp. Guide (CCH) P. 9837 (2000).

Premature to dismiss R I.C.O case before evidence can be presented based on anticipated further discovery and investigation.

Sedima, S.P.R.L. v. Imres Co., Inc. 741 F. 2d 482, only “requires a Plaintiff to prove a RICO cause of action by a preponderance of the evidence”. And sets a standard that Plaintiffs should not be allowed to decide to pursue less than all parties who commit a crime keeping in line with the Supremacy Clause of the United States Constitution based on contribution and indemnification.

February 1992, the American Bar Association’s McKay Commission Report entitled “Lawyer Regulation for A New Century: Report of the Commission on Evaluation of the Disciplinary Enforcement”

STATEMENT OF THE ISSUES

Prejudice, bias, Greed and “hate crimes” to conceal “voter frauds” to date prevents any court or Agency under the jurisdiction of the Florida Governor(s) and the Florida Bar including The Florida Supreme Court, JQC, Florida Attorney General, Florida Department of Law Enforcement and the Second District Court of Appeals from having ruled in favor of Respondents/Plaintiffs now Appellants herein.

Townsend can no longer be considered a young old country boy speculating but has collected facts as proofs these allegations of conspiracy are proved by dates, times, motives and acts to show Mens Rea Corruption in criminal endeavors.

By the years of this litigation and proofs in the related names and court case records listed in the heading above and in the record of this case all defendants and “others doe” are estopped by their own confessions and admissions of criminal enterprise and frauds.

At least at one time or another in these related cases consolidated herein under 06-6005, Plaintiffs v. Gray ET AL defendants have confessed or met the elements of a pleading of the 5th Amendment as “silence by one under such a fiduciary duty to disclose is fraudulent concealment.” First Union Bank v. Turney 824 So2d 172, 189 (Fla. 1st DCA 2001) and per

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

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

Townsend on March 14, 2003, retained Attorney Heather Gray at the direct demand of Attorney Charles Scruggs to assist him in the fight and litigation for all issues related to what caused the destruction of the Townsend family.

Based on the findings by the Florida Supreme Court (SC09-112) it appears Townsend et al was the first of the “Scam for the Shams” of intentional acts of Heather Gray and Heather Gray Et Al.

Even the recent act(s) by which Judge Cook Et Al for all defendant(s) still impedes Townsend from still his right to redress the government in a jury trial or in a church jury trial and from his still church and fellow members and family and ongoing fiduciary duty and investigation is a criminal violation and violation of the FBCCP By-Laws and attempt to prove litigation issues in courts estops any and all defendants as they change their positions with what ever new fraud they need to tell.

Townsend still endures non-negligent truthful performance of his FBCCP membership “special responsibility” to avoid “negligence performance” proving the frauds of Deputy Tim Jeffers until he is permitted

to complete the investigation demanded since about 10/1995 by the voting membership freely voting after being duly informed and not prohibited by the acts of the “sect” and “law enforcers” or “sect agents”.

The acts of all defendants have impeded Townsend performing his “special responsibility” as FBCCP Nominations Committee Supreme Court Ethics member, Awana Commander and as Long Range Committee Chairman per his oath to the membership to perform said duties at the time of his elections to same. Also, Members have been impeded from their votes based on the findings of Townsend and the committees because Jeffers deputies stand even in the Church Business Meetings, on the Church and Court front steps, drive the neighborhoods, drive several counties outside their jurisdiction or even do fraud in church and courts to arrest and detain their objectors.

Townsend did not know at the time he voted as a Nominations (Supreme Court) Committee member not to approve Karen Jeffers as CPCS Principal that this would lead directly to the abduction of his children and all the deprivations that Deputy Tim Jeffers and his “criminal participants” in their “unlawful enterprise” have been able to enact on him and those for whom Townsend speaks. Congress or the Florida Legislature has made no law that states directly or indirectly someone like in this position as

Townsend should expect the deprivations to tamper with his exercising his vote per the ethical religious standards and duties of the FBCCP By-Laws.

Actually just the opposite is true as this Religious Duty Contract Right is one of the most protected freedoms a citizen has.

Additionally as a duty as a Tax Payer, Townsend or those of the non sect and FBCCP Not For Profit Corporation for whom he speaks per F.S. §617 does not want “defamation or a false public light” for the misuse of tax payers funds by the unclean hands of the “sect” and “sect agents” who have “impeded” the plaintiffs right of free choice of life, liberty and pursuit of happiness per their By-Laws Duty.

Jeffers and Howlett and Smoak or anyone individual as a member has one vote. But as “law enforcers” or their “agents” the By-Laws and Law prohibited anyone from “impeding” Townsend in any way from his dutiful process investigation or they and those who as “law enforcers” or “others” who assist them are in a tort violation at minimum of the By-Laws Due Process. **Congress or the Florida Legislature or any Court has written “No” law that enables Jeffers, Howlett, Smoak, Beck, Leatherman, Powell, Meister or anyone to do a fraud to a fellow member other than the “judges” listed herein. Even the means by which the “sect” alleges Townsend was removed as a member was a conspired fraud to the**

members for whom Townsend still serves as per his acceptance of the membership 100% votes in August, 1993-1999 and any vote thereafter September 8, 1999, is in violation of the By-Laws.

Also anyone who impedes the FBCCP and members related questions asked per the law is per the law in violation of “fraudulent concealment”.

The basis of the By-Laws and the practice thereof is members do not tort or fraud one another but live without greed in harmony for the sake of all.

The FBCCP By-Laws are: unique; a contract; and rules by which members must follow or be subject to the By-Laws Process for review of all matters openly and equally.

For Judge Cook to ignore the motions put before her and submitted as part of this record and for her to dismiss with prejudice this complaint, she and or others are in tort violation of the By-Laws and therefore of the whole law per U.S. Constitution Article III, “Bad Behavior”. Per the rule of law each defendant has or had a fiduciary duty to the membership and FBCCP Corporation and By-Laws as a person protected jointly per the Constitution of the United States, State of Florida and the By-Laws.

Not one defendant or “others” yet to be known has the right to join Jeffers/Howlett/Beck Et. Al. in their “criminal endeavor” and ignore the law.

Deprivations of the By-Laws Contract Obligations it appears began by

the unauthorized administrative actions of Elbert Nasworthy revealed in 10/1995. Until deputy Jeffers Et Al stops “impeding” discovery as demanded from the Finance Committee at the announcement of 10/1995, AND STOPS obstructing Townsend from “free” “assembly” with all members including his own children since they wrote of their “unwillful” abduction on October 20, 1999, at the unclean hands of defendants still extorting plaintiffs the members are not made “whole” but or are “impeded” from their rights. HCSO deputies still threatened Townsend in March 2010 to stop trying to see his kids.

Like it or not “No Law impedes the obligation of a (this FBCCP) contract.”

STATEMENT OF THE CASE

Townsend as Townsend et al consulted with Attorney David Gibbs III (Gibbs) as the Christian Law Association advocate multiple times since about 1991 regarding various matters related to the facts in this case and Gibbs knew Townsend to be a person of high integrity.

Townsend since J.H. School knowing Senator John Grant Jr. (Grant) as Townsend et al strongly consulted with Attorney Grant as the retained Registered Agent of the FBCCP upon the “Demand Meeting” events of September 8, 1999. Grant was fully informed of the allegations FBCCP Members via Townsend still as Townsend Et al. made against the “sect”.

Townsend as Townsend et al after a lengthy consultation retained the services of Attorney Charles H. Scruggs III (Scruggs) in July 2000, also fully informing Scruggs and fully trusted and respected his alleged Christian integrity and superior knowledge and advice as a former Judge retained until September 30, 2003. Scruggs in July 2000, stated legal issues and said all Townsend could do at that time was write letters as was done to the Beck “Sect” known at that time and keep doing what he had been saying through the courts regarding the Popper/Chapin/Florida Bar fraud cases. On 09/30/2003, when Townsend et al confronted Scruggs with the Malicious Prosecution Claim being approved to proceed by Judge Crenshaw based on the Beck Et al events Scruggs had handled in case 01-15813 and 01-15814 Scruggs being caught in an bold faced lie that Townsend had no recourses for full restoration for himself and for his family and others stated and confessed “My personal convictions do not allow me to make a church look bad” and “I had no intention of bring up the Church issues into the Divorce Case”. Scruggs was immediately terminated and Townsend wrote in Divorce case 02-4974, a Motion for Rehearing 10/1/2003, advising Judge Timmerman that Scruggs was “FIRED”! Emphasis added. Despite being “FIRED” it is know proved Timmerman, Gray, Scruggs and “others” conspire to keep the “criminal enterprise” working against anything

Townsend advocates.

Townsend as Townsend et al retained the services of attorney Heather Mary Ann Gray at the directive of Scruggs on March 14, 2003, and paid a demanded \$1,000.00 retainer as Gray “angry and appalled” stated that would more than cover her investigation and filing any appeal as she would rely on Scruggs for details to prepare the Divorce Appeal to include the details of the underlying cases.

Townsend as Townsend et al stated to Judge Cook this all began when Townsend per his duty to the Church confronted the “sect”. With that Judge Cook shut down plaintiffs case. The Florida Bar reported to the Florida Supreme Court and signed by Heather M. Gray Respondent on 12/10/09:

“¶ 7. Respondent asserts ... admits that during the relevant time period, she was suffering from significant mental health issues...
¶ 8. In July 2009, Respondent voluntarily elected to be placed on inactive membership status with the Florida Bar. ¶9. Respondent admits that as a result of her conduct and by reason of the foregoing she has violated the following Rules Regulating The Florida Bar:...”.

Plaintiffs asserts disagreement with The Florida Bars claim now of start “relevant time period” as the same charges Gray admitted to the Florida Supreme Court were the same charges this 2DCA admonished and denied Gray multiple times for in the Townsend Divorce case 02-4074 and Appeal 2D03-5679, Gray handled allegedly by all defendants even The Florida Bar

“properly” for Plaintiffs her former clients. The Florida Bar, Jane Christy admitted in 12/2005, The Florida Bar Complaint #05-3799, against now defendants was “thrown in the trash”. Yet now The Florida Bar, Gray and the Florida Supreme Court confirms Townsend allegations of the starting of these same patterns from 2003, so how does judge Cook or this lower 2DCA say otherwise. If in July 2009, Gray went “inactive” her filings to judge Cook show: a fraud to the Courts including judge Cook and the Florida Supreme Court; proof of another violation of Rule 4-3.3 (Candor Toward the Tribunal) and Rule 4-8© (conduct involving dishonesty, fraud, deceit, or misrepresentation); is a proof her filings to judge Cook could not happen as a matter of law; and therefore shows her in default as Townsend alleged and shows the bias and prejudice of judge Cook to assist defendants in total disregard for the Supreme Court ruling her “inactive” or for the law.

Judge Frank Gomez, resigned from this case twice knowing and admitting to the acts of criminal enterprise to which Gray now admits.

The dismissal by judge Cook is a continuation of the violations of laws by the defendants and “others doe” she attempts to conceal in their joint criminal endeavors and criminal enterprise.

Defendants still act jointly in conspired criminal enterprises to illegally detain and deprivate Plaintiffs at all costs and Plaintiffs make

another attempt herein to be fully restored of their rights and property and be fully compensated to the fullest extent of the law.

STATEMENT OF THE FACTS

The FBCCP Nominations Committee for which Townsend speaks since about 1994 per the duty of the By-Laws:

(1) rejected the hiring of Karen Jeffers as CPCS School Principal based on her lack of qualifications and nepotism but the “sect” violated the By-Laws to include her in their acts of the criminal enterprise

(2) and at the request of Dr. John Berry, Citrus Park School Pastor and Principal in about 10/1995, and other members upon the announcement of Elbert Nasworthy in the Quarterly Business Meeting about the tax benefits to cover his or others home taxes showing money paid without congregation approval, began an “internal investigation” in reviewing any and all financial transactions and related activities affecting the “public light” of the FBCCP Corporation and members.

Each Defendant has knowingly for a “criminal endeavor” “impeded” this investigation and the lead voice Townsend and has assisted “Law Enforcer” Tim Jeffers and “others” “obstruct” and “deprive” including the abduction and extortion the fellow FBCCP members of Tim Jeffers Individual in his the “criminal enterprise of the sect” and “others” at tax

payers expense to unequally benefit the “sect” and “sect agents”.

The Plaintiffs desire to be restored to their “rights” and be made whole and the law be done to the fullest extent to the abductors of Plaintiffs “rights” and “property”.

The Plaintiffs desire discovery of all papers, and product related to the investigation began in or about 10/1995.

The statue of limitations has not expired.

Even in the Chambers of Judge Cook when Townsend attempted to state his positions in the record, Judge Cook interrupted and even showed her malice by herself and her extra bailiffs as Townsend is a magnet for bailiffs and has been intentionally abused multiple times at the courts.

Financially Townsend is unable at this time to pay for the transcripts to support the positions of prejudice (09/2009) by judge Cook.

The evidence collected and confirmed by C.P.A’s, lawyers and other “experts” and being “impeded” by this dismissal and the ongoing co-participants of the “Criminal enterprise” confirms all Plaintiffs claims and deprivations.

Criminal Motives and proofs of the “self dealings” of each defendant can be presented at trial and defendants know Townsend knows what to show a jury and even his church members jury but “law enforcers” still

attempt to arrest Townsend for any charge they can create as the HCSO deputies in March 2010 warned. The trespass warning 07-650170 issued 10/28/2007 by HCSO per the call of the “sect” at the FBCCP worship service because Townsend was just sitting on the back row shows the public what Jeffers “sect” said they would do since 09/08/1999 because of the “Demand Meeting” of “Show me the money and stop the building scheme frauds”. Now we have proofs the money and teaching jobs and free private school education for the Jeffers, Smoaks, Becks and “others doe” was a financial motive. We also now have proof by the 18105 Gunn Highway property going up for sale and the years of wasted litigation trying to get permits for new zoning have proved a fraud. In 1997, Townsend and the Property Acquisition Committee and the members did not approve the purchase of the property unless we got the permits first. Beck and his “sect” deceived the membership and bought the property as the contracts show in contrast to the vote of the membership. By this 1997 vote, the “sect” with deputies was already to deep in conspiracy to stop Beck bragging that “he wanted up to \$40,000 to remodel the home, so he could have more bathrooms for his daughters and a pool and live in the country like his brother Donnie.” The “sect” sold out my kids and Church members for “bathrooms” and you do not call them a John Couey or Bernie Madoff when

they still in March 2010, tell me to drop this lawsuit and do not try to contact my kids. If that is how our judges think then “Old Sparky” needs you too. These defendants do these intentional (too many to list in this limited brief) crimes of abductions to kids in what is to be a safe Church School “NOT for profit”. Besides what they take from the “Not For Profit” these government officers take our tax payers money and use that against us also to promote and conceal their other criminal acts “under the color of law” as they grant themselves immunity from prosecution because the Governors (Bush,Crist), Attorney General (Crist, Butterworth, McCollum), Harkness, Berry and the Sheriffs (Gee, Coats with Col. Gary Terry) control and trained the “law enforcers” non prosecution and leverage the courts in any civil matters or prohibit Townsend from speaking to his fellow members in the church.

Judge Gomez recognized the criminal enterprise of defendants and recused himself from this case twice.

Judge Padgett sitting in for judge Clark in August 2009, stated Gray was in default but recused himself without an Order because he showed he was a disappointed friend of Gray when she arrived late and said she could not find the courthouse and called Judge Padgett the wrong name.

ARGUMENT AND CITATION TO AUTHORITY

When will “law enforcers” honor the “Law” and the FBCCP By-

Laws Contract?

If an individual in public came to you and detained you and said I am a sheriff and you will do what I say, What would you do? Better Yet.

If Polk County Sheriff Grady Judd came into this Second District Court of Appeals and said to any one of you as the Chief Judge or you as a DCA judge “your fired” and I am putting my wife in as the Chief Judge to “rule per the laws as I demand” you and other judges to enforce only my way, What would you do?

What would you do then when you refused to resign, then that the Judd came and took your kids from you on intentionally created false charges created only to remove you from the bench?

You would “DEMAND JUSTICE” and cry “Odious and Outrageous” as the violation of your and the citizens “Due Process” to “serve and protect the standard of care the citizens expect” in separation of powers in a Democracy not to be ruled by a self appointed Saddam tyrant or king.

You would expect the elected officers as Governor or the Attorney General to not let this happen to block your right and duty to review Issues per your jurisdiction but then you find out they had ulterior motives for “criminal endeavors” and they needed Mr. Judd as Sheriff Judd “under color of law” to conceal their unlawful acts so they could not let the public

“voting” members know the facts on a case destined to come through the court or the “court of popular opinion” if the “vote” is allowed.

For the issues relating to the Governors (Bush/McKay) race this is what Charlie Crist did when Plaintiffs allege he intentionally did not give the Loyalty Oaths to the Florida Supreme Court Judges (Quince, Anstead, Wells, Pariente, Cantero, Bell, Lewis) but Butterworth did in October 2007.

The information Jeb Bush privately got on the criminal acts of attorney Bruce Chapin done with Linda Chapin and the Orange County judges and Florida Bar Officers gave Jeb Bush (as he admitted) with Linda Chapin off the ticket the election as the Orlando Sentinel wrote she controlled the I-4 Corridor. Townsend alleges the Florida Supreme Court Judges thus had motive to call multiple times the Presidential Election for Gore verses Bush because of bias about the motives of Jeb Bush, Charlie Crist, Harkness and Berry.

For the issues relating to the FBCCP Members this is the “judge” line crossed since 10/1995, when your “law enforcer” trained Tim Jeffers as Mr. Judd, judged the facts rendered for his own “self dealing” and those of the “sect” and “impedes” since 1995 the investigation requested by the CPCS School Pastor Dr. John Berry and “others”, for the Nominations Supreme Court Committee to review any and all FBCCP and CPCS Records

and “Judge and Jury Jeffers” put his wife (Karen Jeffers) as the CPCS Principal later terminating Dr. John Berry, in exchange for detaining and blocking the: Constitutional Rights; FBCCP By-Laws, Nominations (Supreme Court) Committee; and the FBCCP Members Rights and so by using his “mask” as a “Law Enforcer” to each little innocent kid who is taught to respect officers and violated each tax payer by claiming his acts were “under color of law” and there was not “wrongdoing” as they violated the FBCCP By-Laws and Law for their endeavor of criminal practices against tax payers.

Per Florida’s Religious Freedom Restoration Act, no defendant has any right to detain or deprive Plaintiffs.

While “law enforcers” try to fraudulently say for years no crimes were done (but many do off the record), not one “law enforcer” including Jeffers, Howlett, Smoak, Shumate, Corbin or their co-participants (Jeffers et al) had the right to “impede” the FBCCP By-Laws “internal self governing process”.

The standard of care for “law enforcers” is the claim can neither be Unlawful, a fraud or frivolous. But for the “impeded” “fact finding” and truthful documents required by proper service to the members per the FBCCP By-Laws in or about 1995, Plaintiffs would not have suffered

“reckless” and fraudulent deprivations and damages at the hand of “Sect”
Jeffers/Howlett et al. as are still ongoing.

Plaintiffs are prepared to argue the:

“Florida Statutes 617.0834 infers 1. the violations of “Criminal Laws”
“estops that officer or director from contesting the fact that his or her
breach, or failure to perform, constitutes a violation of the criminal
law...” “2. A transaction from which the officer or director derived an
improper personal benefit, either directly or indirectly” or 3.

“Recklessness or an act or omission which was committed in bad faith or
with malicious purpose or in a manner exhibiting wanton and willful
disregard of human rights, safety, or property.” Are grounds for
investigation and potential criminal or civil charges for violations of
Criminal laws or the BY-LAWS.”

PER Wests F.S.A. §95.031, LIMITATIONS OF ACTIONS ¶ 43

“A statute of limitations runs from the time the cause of action accrues
which, in turn, is generally determined by the date when the last element
constituting the cause of action occurs.”

And 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.”

and **points of the Private Securities Litigation Reform Act of 1995**
 (“**PSLRA**”) and show that “law enforcers” as deputies, lawyers, accountants
and “others” knowingly violated the F.S. §617 and other law and the FBCCP
By-Laws and these plaintiffs to conceal the “sect” and “sect agents”
corruption enterprise sham scheme abducting money, rights and kids not
with negligence or recklessness but with intentional “Hate Crime” calculated

Treason to the Constitutions of these United States, Florida and the FBCCP By-Laws.

Deputy Jeffers as Tim Jeffers Finance Committee Chairman and later as Trustee with the “sect and sect agents” deprived the rights of members, knowingly and recklessly and willfully and intentionally produced and uttered false reports, and conspired to conceal false reports and criminal acts and violations of the FBCCP By-Laws by himself, the “sect” and “sect agents”.

Deputy Tim Jeffers was concealed by the actions of “Primary actors” Gary Leatherman, Frank Edwards, Ron Beck, Elbert Nasworthy, William Brown, Herman Meister, Geoff Smith, Dr. Lon Lynn, Jim Bates, Paula Powell, Mr. Janssen C.P.A. and HCSO Sgt. Joe Howlett and Pasco Det. Mike Corbin and HCSO Sgt. Mike Smoak (Deputies) and Coast Guard Officer Mike Shumate and State Senator John Grant as the Registered Agent for the FBCCP Corporation, HCSO Gary Terry, Attorney David Gibbs and Drew Gardner of the C.L.A., Attorney Charles H. Scruggs III and Attorney Heather Gray and Attorney Charles Denny IV for the firm of Dickinson and Gibbons and their “superior officers” as “Law Enforcers” and “judges” has had willfully Mens Rea knowledge and intent to conspire to do torts to the FBCCP, the By-Laws and the Members Contract as members with due

process rights and at the intent to “extort” and “defraud” taxpayers.

These “right wing” persons also did not want to give credit to the facts Townsend alleges and can prove of how Crist and Jeb Bush controlled the Governors elections. Townsend makes not allegations to benefit any political party but only states facts based on ethical and lawful rules.

These Plaintiffs are prepared and the defendants know it to show how point by point many legal standards both Federal and State and even of the Securities Exchange Act of 1934-Section 10(b) and Rule 10b-5-Reliance can be applied to the facts of this case.

“Law enforcers” and as the “sect” use the non member “sect agents” also fully informed to conspire with deprivations of rights and obstruction and extortion as shown by these deputies since 1995 and through the HCSO crossing multiple county lines in March 2010 and at other times to obstruct and extort Townsend and others by these their same threats of “abusive litigation”, Malicious Prosecution and Abuse of Process by their improper motive and illegal detainment and frauds as they have done to Townsend as the “voice of the FBCCP persons” since the start of the Nomination Committee Supreme Court investigation of By-Laws violations reported by Dr. John Berry in 1995, now proved as a “Bernie Madoff” and “John Couey” and “En-Ron” and “Author Anderson C.P.A.” scheme of criminal

enterprise to deprive religious families from investments made for their kids and kids kids and kids kids kids etc. while giving themselves total unreported control and detainment of donations, tuition and tax payer dollars, requiring plaintiffs paying out of their own pockets for legal services and charged legal fees and fines just to get the right to address fellow family and co members and by the “sect” and “sect agents” self dealing employment and nepotism and immunity from criminal acts. Jeffers et al “Law Enforcers” in violation of F.S.§775.03 Unlawful Benefit to Clergy, (alleged Clergy until the members found out enough facts Jeffers et al tries to still conceal) even still use the informed “law enforcers” and judges to by “tortuous” acts keep or interfere with still proved legally member Townsend from his Church and Families Duties and Rights and “Interfere with All Relationships” since 09/08/1999 and before as if Townsend was a detainee with less rights than one in Jeffers jail or Club Gitmo. These “law enforcers” did more frauds on the courts and crimes than the Aisenberg Case deputies led also under HCSO Gary Terry during the same 1999 time periods and these deputies are given special care from alleged “prosecutors”.

In 1997, the FBCCP Congregation in a required FBCCP Quarterly Business Meeting alleged through Randall Townsend as Nominations Committee Member and Long Range Planning Committee Chairman said:

“the Roosters (Jeffers, Beck, Leatherman, Meister) were guarding the hen house” and “Don’t buy the 18105 Gunn Highway Property without the Zoning Permits first”.

Still to this day and before on September 8, 1999, through Randall Townsend an additional “Demand Meeting” was held and Townsend stated: “Show me the money trial”; “Stop the building scheme frauds”; and “If you take these keys you are saying you do not want the truth”. The “sect and sect agents” now as defendants herein with “others” still deprive Plaintiffs by trying to put in a now proved “sect and sect agents” false public light on all counts that Randall Townsend was the “liar”, “suffering from a mental breakdown”, “with guns”, “dangerous” and “molester and abuser of his wife and kids” and in 01-15813 a “Repeat Violence Offender” and in 01-15814 a “Domestic Violence Offender” and in 02-4974 Divorce Case, trained Scruggs and Gray et al knowingly did ex parte acts, extrinsic fraud, intrinsic fraud, and fraud on the court with the intentional co-participant judges under the directives of the HCSO and County Administrator Bean with knowledge by the Hillsborough County Commissioners and State Attorney Mark Obers office brought into the case as the demand of HCSO Sgt. Howlett Et al all as a “sham” to conceal now proved Mens Rea criminal components of the criminal enterprise. Scruggs argued many times opposite the standards he

did against his own clients herein. Especially after September 30, 2003, when the ruling of Judge Crenshaw exposed his intentional frauds to these clients that they did not have any legal rights to oppose Beck Et Al but said in July 2000, "Townsend could only write letters" but Judge Crenshaw granted the right to continue under the Malicious Prosecution Count she later finally in May 2006, in a line by line careful evaluation to conceal defendants in total wrote the Malicious Prosecution Count barely modified for Judge Cook but dismissed which is now before this Court after being admitted by Judge Crenshaw that by rewriting the complaint in May 2006, she was trying to help Townsend if he would just shut up.

Until this FBCCP Church Religious Rights case gets a chance at minimum gets to the District Court of Appeals, prejudice and bias from the Hillsborough County Sheriffs Department via F.S. §26.49 as Sheriff is Executive Officer of the Court and Hillsborough County Commissioners per the County Charter controlling the Thirteenth Circuit Court Judges and rewards of fees and attorney representation of Scruggs, Gray and "others" not exposing their "enterprise practices" this impedes justice and the right to petition the government for their own controlling abuse and insulation and immunity.

The Hillsborough County Board of Commissioners and their Charter

do not have greater rights than the FBCCP By-Laws gives its members yet the Commissioners are able to remove the County Administrator Pat Bean, County Attorney Renee Lee and others for “self dealing” even before the investigation of the allegations is complete by the FDLE as they say for the benefit of tax payers and Commissioner are unable to “rely” on the advise of their Bean and Lee counsel. Yet the FBCCP and Plaintiffs are required to allow any and all even now proved “intentionally uttered false reports” by Jeffers, Howlett and Smoak et al who still unlawfully threaten with arrest and block members from attending the FBCCP Business meetings or worship services and have “sect agents” as Judges and attorneys and “others” even harass members to not practice their By-Laws and Constitutional Rights because deputies still illegally detain and deprive plaintiffs rights in violation of the law per **Kaisner v. Kolb** 543 So.2d 732, 1989 Fla. SCt 2682 and F.S. 768.28. **Per First Free Will BAP.CH. OF BLOUNTSTOWN, INC., v FRANKLIN, ET AL.** 4 So.2d 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 court is required to intervene when fraud is alleged and here in has been proved involved even through years of FBCCP Business Meeting

and Credit Card Records, Bank Records and Loans and Court Cases in Eminent Domain, Zoning Issues, Violence Issues and all related claims made by Plaintiffs known to date subjecting Plaintiffs to defamation and deprivation by “abusive litigation”.

Fellow Judge of Judge Cook, Judge Marva Crenshaw revealed “all things are related” in her September 7, 2006, Court hearing after Townsend revealed her inappropriate direct connections with Governor Jeb Bush and Charlie Crist were a prejudiced conflict of interest and alleged part of the criminal endeavor still being advocated as Judge Marva Crenshaw even wrote the submitted parts of this Complaint for Count for Malicious Prosecution which now Judge Cook ignores and extends the criminal endeavors already admitted by Judge Crenshaw, Federal Judge James Moody Jr, The 11th Circuit Court of Appeals and defendants and “others”.

When Judge Crenshaw realized she was an exposed “bribed” co-participant in case 02-03812, for about 4 years in the deprivations of these plaintiffs as she blocked Townsend using **PELLEGRINI** id. adding any defendants to Beck she: attempted to coerce and force a Summary Judgement rejected by Plaintiff Townsend because said Summary Judgement was a coercion to require Plaintiff Townsend to become a co-participant to continue the violations of the By-Laws and Rules of Law; then

resigned and appears to date to take the 5th Amendment for the protection of herself and her co- participants.

When in August 2004, Judge Gomez realized his role in the criminal enterprise assisting Scruggs and Gray and former wife Karen Townsend and other defendants herein, he recused himself. On June 26, 2007, Judge Gomez after counting the days and admitting Gray was in default, then again took until July 2, 2008, to sign his recusal Order. (Record pages 155-157).

When Judge Sierra realized she was an exposed co-participant for her role in the “sham” related 02-4974 Divorce Case and 02-03812 case, she resigned and even left the bench when confronted that she must arrest herself and other “law enforcers” for her participation in criminal acts.

For the issues relating to the FBCCP Members case and the related matters conspired by the “sect” and “sect agents” to deprive their elected spokes person Randall Townsend and his children, justice has no chance of “due process” until the events since the conspiracy by attorney David Popper and “agents” of Popper/Chapin et al. are exposed as contributing actions to the uttered false reports began by David Popper to conceal his intentional malfeasance and acts to gain employment in the law firm partnered by Bruce Chapin, as husband of Linda Chapin, the former Orlando Orange County Chairperson. The Florida Bar admitted regarding the Chapin et al acts up to

and including 1999:

“Mr. Townsend. This is the worse case of abuse I have seen in my over 27 years of investigating cases for the Florida Bar but my boss told me to close this file and never talk to you again. Good Bye!”

Look at it now as facts show Jeb Bush with private and superior knowledge gained during and after a Town Hall Meeting recorded at Channel 13 Fox Studios in Tampa where Townsend asked the panel of potential Republican Governors, “What do you do when you find out the Florida Bar is lying to you?” and Jeb Bush used the information that Florida Bar officers were intentionally doing the lying to benefit the Chapins and Popper malfeasance which was sufficient leverage to exclude Linda Chapin from the Democratic Ticket with Buddy McKay. Thus Jeb Bush wins the Governors Race with Charlie Crist and “others” on his Republican coat tail ignoring the duty of the governor or AG, until the recent events of 2010 and the veto of the Teachers Bill exposing Crist to go independent in his bid for Senator.

Former Attorney General now Governor Charlie Crist also maintained a “detention” and prejudicial leveraged influence of Florida Supreme Court Judges by failure to administer their Oaths of Offices timely per the **Report of Attorney General Bob Butterworth AGO 96-41**. Plaintiffs allege this gives “Crist et al” a “trump card” in the form of a petition for the writ of quo warranto when necessary to influence the court relating to matters under

their jurisdiction during their time of no Oath of Loyalty to Constitutional Protections until executed October 2007.

Until this victim Randall Townsend as the individual and as the elected spokes person for the FBCCP and Membership and Citizens gets this case heard by some court beyond the prejudice and bias of the office of the Governor and Attorney General and the Florida Bar, the Plaintiffs rights to petition the government for their own controlling abuse is also impeded by those who have control over the destiny of the truth and justice.

It is clear these underlying facts and factors were clearly by Ex parte put in the mind of Judge Cook as she acted: with prejudice and bias and exposed her knowledge of facts not yet within the “four corners” of the complaint; to suppress discovery of rights and rights violations of these Plaintiffs; to give prejudice to defendants through judge Cooks candor assisting Heather Gray and even by her treating Gray as an attorney despite her already being found guilty by the Florida Bar and having resigned as an attorney and by judge Cooks dismissal of all Plaintiffs Motions and the case with prejudice showing she intends never to give any plaintiffs any rights. Judge Cook for judge Cook et al shows she intends to ignore the demand for injunctions and discovery and conceal the now proved knowingly fraudulent and “reckless” “self dealing” enterprise records Jeffers/Howlett et al

submitted to the “public” and FBCCP membership before 10/1995.

The “sect” and “sect agents” knowingly in violation of the FBCCP By-Laws and F.S. §617, for purposes of continuing the “Sham” led the FBCCP and FBCCP Members against their will into ongoing “defamation” by fraudulent legal positions in the 1997 eminent domain case, the 01-15813, 01-15814, 02-4974, 02-03812 and all related cases as listed above herein and any and all cases in the “sham” attempts to get Zoning variances for the 18105 North Gunn Highway property as the “sect” knew the frauds and recklessness of their “self dealing” enterprise scheme.

Fed 11th Circuit Court of Appeals pointed out in this case that discovery was stopped and therefore justice and the plaintiffs per the Constitution was deprived by defendants in this case and by “others Doe”. Judge Cook continues the conspiring to assist each defendant still in violation of protecting the “false reports” of Jeffers et al and Popper et al. designed to utter false reports at any cost to defame Townsend and his enterprises and business and those for whom he speaks.

Townsend in supervising many “Big Box” retail stores and employee management was faced with many types of “self dealing”. Internal investigations were done and at times the “law enforcers” were called. The “law enforcers” responded to the call and in those cases did

not themselves start continuing the crime or conceal the crimes. Why is in only this Church case are threats and the deprivations made when “whistle blower” Townsend is trying per the “elected” FBCCP duty to “balance the books” by “show me the money”!

It is because of the “prejudice conspiracy” by Charlie Crist et al to suppress any and all evidence, business, or enterprise that Townsend may have or show that may reveal Crist et al abandoned the rule of law to win his or others political posture and power and illegally tamper with the rights and votes of others.

Per *Salinas v. U.S.* 522 at 65, 118 S.Ct. at 477, 139 L. Ed. 2d at 362:

“A conspirator must intend to further an endeavor which, if completed, would satisfy all of the elements of a substantive criminal offense, but it suffices that he adopt the goal of furthering or facilitating the criminal endeavor. He may do so in any number of ways short of agreeing to undertake all of the acts necessary for the crime’s completion.”

Every “defendant” with judge Cook in this Complaint has said “Go ahead and conceal the crimes” and rights of Plaintiffs as long as you bribe and pay me to help your unlawful “breach of contract” and “other crimes” take over and as long as you maliciously prosecute and extort naïve innocent kids allegedly protected even now of their religious rights, due process rights in court, or due process right to address a grievance against the violating government officers and rights to have a father!

Plaintiffs and as informed “Citizens of Florida” are fully able and capable for a long time to show the points of law and facts which meet the RICO standards of proof in: Sedima; Reves; Bennett v. Berg; Turkette ---- and the February 1992, the American Bar Association’s McKay Commission Report entitled “Lawyer Regulation for A New Century: Report of the Commission on Evaluation of the Disciplinary Enforcement” co authored by John Berry revealing the “enterprise” of John Harkness with a fiduciary conflict of interest to the Florida Lawyers Mutual Insurance Company (FLMIC) and as to the Florida Bar and John Berry and Governors(Bush/Crist a lawyer) to “bribe” the judiciary and lawyers by loss of their license to practice law just as the Florida Bars words in 1999 said to Townsend “If you ever get your law degree within six months I will see you get disbarred”. The exhibits included in the complaint and the SC –09-1121, show the Mens Rea “criminal enterprise” of the “law enforcers” and extent to what they do to continue their “enterprise of criminal endeavors”.

Scruggs first retained in July 2000 through his “firing” September 30, 2003, when he confessed “My personal convictions do not allow me to make a church look bad” and “I never planned to bring the church matters into the divorce case” and attorney of record in the 01-15813 and 01-15814 Cases and 02-4974 Divorce case even wrote in 2002, “I knew you were an honest

man” but still participated and received “self dealing” to abandon and conceal the rights of his clients in order to conceal the conspiracy and criminal endeavor of his co participants listed herein and “others” yet brought to true “public light”. Scruggs statement “My personal convictions do not allow me to make a church look bad” per his confession to Judge Stoddard in February 2006, was that deputies intimidated him but still intentionally with the collusion of defendants assisted to promote their criminal endeavor using tax payers dollars, FBCCP donations and tuition’s and legal fees to maintain dominance directly co-directing the conspiracy of the criminal endeavor as he admitted in February 2006, to judge Stoddard and as his letter as Amended Complaint Exhibit Five shows proofs.

The FBCCP Membership when learning of the “false public light” and violations of their “Missions Quest” and rights and the By-Laws by the “pastors” as Nasworthy, Brown, Meister, and Beck did terminate their employed leaders as CPCS Dr. Berry and Townsend expected would be the course of the membership upon presentation of the finding of the FBCCP Ethics Supreme Court in 1995. Additionally, several in leadership departed being connected to the “sect”. All that remains constant is that Jeffers, Howlett, Smoak and select others remain in positions wrongfully gained by the endeavors of the “sect” and “sect agents” acting in violation of the

FBCCP By-Laws and members rights of self governing as these “law enforcers” taught, concealed, conducted and conspired still for self dealings. “Alleged” “Lawful Officers” still advocate deprivations against Plaintiffs.

Defendants trained Gray is now disbarred by the Supreme Court and reprimanded by the Florida Bar and the 5th DCA and even this 2DCA reprimanded and sanctioned Gray because of the acts she did to deprive her clients other than Townsend and for whom he speaks. These deprivations were of the same pattern of acts Townsend exposed of Gray and her co participants but only when other victims not connected to the Townsend claims and defendant enemies list did the due process for her other victims see action. These same now Judges against Heather Gray trained and or excused her actions against Townsend et al since 2003, but now seek to conceal their double standards violations of “due process” and criminal endeavor. Judge Cooks ruling clearly points out again as a shining “public light” of and on the violations of due process.

Charlie Crist is no longer with the Republican Party but is exposed to stand on his own merits as he seeks another elected office.

Did the HCSO make visits to all the victims of former attorney Gray and tell them to stop trying to advocate the rights of their cases or stop trying to see your kids or stop trying to go to the church of your youth? I think not.

Emphasis Added.

If now HCSO Col. Gary Terry is retired as deputies claim then proof is shown that “others” are in the directive to control or tamper with the criminal endeavor to attack and suppress and obstruct a “Whistle blower” victim of Gray et al. as deputies said their goal was to stop Townsend contacting Former Republican Senator and FBCCP Registered Agent Grant.

If now Hillsborough County Administrator Pat Bean, County Attorney Renee Lee and “others” are “suspended” and to be “fired” as these persons have, had or still have direct and indirect control of the Hillsborough County Courts and Government who is excusing the waste of tax payers dollars for deputies to spend time obstructing a victims redress rights to due process?

By ignoring the claims made in this Complaint “law enforcers” impede contracts and intentionally allow “under color of law” torts by alleged “law enforcers” since the unlawful acts and conspiracy began by Tim Jeffers and as Jeffers et al against FBCCP and the Members or by “attorneys” Popper and Chapin to conceal the malfeasance of Popper et al in and since 1988.

Townsend has never now for over 16 years had the right to “address” grievances by alleged lawful government persons since Popper by his acts or

Tim Jeffers did his first “unlawful conduct” as violations of the By-Laws and Conspiracy to conceal embezzlement to the membership of FBCCP designated funds. It is now fully proved a conspiracy by defendants herein who have stopped due process! Townsend and Plaintiffs for whom he speaks has been told “do not expose the crimes” or still suffer the wrath at the unclean hands of defendant “law enforcers” and “others”!

The direct relationship of “law enforcers” working more for their own personal self dealing has been proved and connected from Governor Charlie Crist, Jeb Bush, John Grant, HCSO, State Attorney Mark Obers office, Pat Bean and directly down through all listed defendants and “others” intentionally conspiring proved by the actions of Heather Gray and judge Cook all the way connecting to the illegal obstruction and conspiring by Pinellas County Sheriff Deputy Tim Jeffers.

No defendant or “law enforcer” including this court has the right to require, extort, threat, obstruct and defame any person because this person tries to report a crime!

No defendant or “law enforcer” including this court has the right to require, extort, threat, obstruct and defame any person because this person tries to keep a promise to protect and provide for his family, his beliefs, his Church, and his fellow members based on their beliefs and freedoms to

practice those beliefs protected by the Constitution of these United States, State of Florida and Church.

By not “treating” to the fullest extent of the law, Deputy Tim Jeffers, Deputy Joe Howlett, Deputy Mike Smoak, Ron Beck, Herman Meister, Gary Leatherman, Charles Scruggs, Heather Gray, John Grant, David Gee, Mark Ober, judges and “others” of these criminal patterns exposed for their “self dealing” just as the like of John Couey did to abduct children from a parent then the “law enforcers” are involved in a conspiracy and extortion to do a “double standard” and “undue and unequal process”!

The dots are connected of who is involved in this conspiracy of obstruction of the lawful process even in the dismissal of this complaint by Judge Cook per the directives of the “sect agents” and then again per the March 2010 acts by the sending of two HCSO Sheriff Deputies to come to find me and “threaten” me to stop sending “e-mails” to John Grant and Jeffers et al and “let it (proving the crimes) go” or they will arrest me for “harassment” and they ignore the crimes of the “sect” and “sect agents”!

More dots are connected even by the Florida Supreme Courts and Florida Bar’s handling of the disbaring of Heather Gray being “let off” and not facing criminal prosecution and jail for her abandonment and embezzlement of her clients because prosecution of Heather Gray,

individual and Heather Gray et al will expose and connect more “dots” that even Judge Cook was sent to conspire and conceal stopping the “on the record” testimony in her chambers.

All Defendants have done at minimum this one Tort.

They have “intentionally” with Mens Rea actions ignored the: standard that Plaintiffs should not be allowed to decide to pursue less than all parties who commit a crime keeping in line with the Supremacy Clause of the United States Constitution based on contribution and indemnification. Thus the Summary Judgement and limited defendants by Judge Crenshaw blocking Townsend for many years from using Pellegrini v. Winter and attaching all co-participants known at that time because of their blocked discovery by Jeffers et al in the 02-03812 underlying case and related cases. Just as Judge Holder unlawfully and fraudulently ruled “Res Ajudicata” to conceal additional new co-defendants sued through the 01-15814 case related to 01-15813, showing the conspiracy so could other judges as now has been proved again by Judge Cook that the “scam to sham” promise of Judge Crenshaw was a “scheme” of the criminal enterprise participants.

They have also ignored: “Right of Plaintiffs Religious Freedom”; “Plaintiffs Right to Address the Government”; and to Assemble; Speak; Right to freedom from unlawful Government Invasion of Rights; and to act

per their FBCCP By-Laws as sought to be protected, preserved, purchased and as this “elected” duty Randall Townsend as and for FBCCP:

Nominations Committee Member (Ethics Supreme Court); Long Range Planning Committee Chairman; Awana Commander; and as per the rights of several other positions; and or as a “member”; a “parent” and citizen had to perform as the “members” elected voice to honor the members and their “rights”, the FBCCP Corporation, the FBCCP By-Laws, and the law of the land per the contracts as Constitutions. No “law enforcer” has required Tim Jeffers to operate per the FBCCP By-Laws or even per his duty as a non criminal conspiring to get his wife employment and concealing fraudulent miss use of FBCCP and Members Assets and Citizens as Tax Payers money and resources!

Defendants have conspired to ignore their duty to honor their own laws, oaths, due and equal process rules and prosecution for criminal acts to continue to cause deprivations on plaintiffs and rewarded themselves and others who by fraud acted as “agents” for Plaintiffs.

All compounding and multiple additional torts cannot be detailed in this brief brief because of the ongoing criminal conspiring by the initial participants frauds under color of law acts to conceal their own criminal acts and acts of their “agents” by which they conspire to still benefit by their

fraudulent self dealing.

Any act by “law enforcers” or “public officials” or “others” to be prejudiced or biased on behalf of Deputy Tim Jeffers in his violation of his duties as Tim Jeffers individual as FBCCP “official” and “member” is in violation of the Constitutions of the: U.S.; State of Florida; and the FBCCP. Emphasis Added.

It is only the frauds of Jeffers et al as for their purpose of “self dealing” and frauds and conspiring to maintain that Townsend is not acting per his individual rights and his children and these members who “elected” Townsend to do “duty” and the law.

Per the law of Florida in **First Free Will Bap. Ch. V. Franklin** 4 So. 2d 390, 148 Fla. 277, all one has to show or prove is the fraud of the sect or self dealers for the court to intervene. The “sect” vested itself behind the extortion of Deputy Jeffers interfering by frauds the “First Free Will” likewise of this FBCCP membership.

The “Sect Agents” of Deputy Jeffers have by torts acted to impede the “Free Will” of the plaintiffs herein. The “Sect Agents” have thereby trained, supervised and invaded to deprive plaintiffs for whom Attorney Gray was retained March 14, 2003 at the directive of Attorney Charles Scruggs III to assist him in the deprivation of rights of plaintiffs.

The “Sect Agents” of Deputy Jeffers have by ignoring the torts of Jeffers gave a “get out of jail free” card to all his criminal acts and those of his agents as a violation of due and equal process for plaintiffs even to invoke their practices of the FBCCP Contract By-Laws now for 16 +years.

As the FBCCP Supreme Court the Nominations Committee was asked by Dr. John Berry to investigate what Elbert Nasworthy as Administrative Pastor advised was a miss appropriation of funds, self dealing and violation of the By-Laws. Mr. Jeffers in the role as Sheriff Deputy Jeffers became Mr. Judd and had his wife replace Dr. Berry and has since 1995 done fraud to still “impede” the investigation.

We know fraud was done since about 1995 or before and have proved the frauds by the discovery of: documents produced by Judge Crenshaw Order of May 2006, Earle Purchase Contract: and the multiple denials of the “zoning rights” for the CPCS School of the Earle Property as Townsend has pledged since about 1995!

After years of “partial discovery” despite the “impeding” and “obstruction of justice” and “false defamation” against Townsend as the investigator and fraudulent support for the crimes proved of Beck and Jeffers and their “sect et al” we can now answer “Yes” to these questions. Emphasis Added!

Did Ron Beck and “others” of the “sect” pay themselves money that was not truthfully reported every 90 days to the members as the FBCCP By-Laws require?

Did the Nominations Committee oppose the “appointment” rather than the FBCCP By-Laws process confirmation of Karen Jeffers?

Did the Nominations Committee oppose the “appointment” rather than the FBCCP By-Laws process confirmation of Joe Howlett?

Did Tim Jeffers and Joe Howlett conspire to conceal the now proved false reports of Ron Beck and the “sect”?

Did the Superior “law enforcement officers” of Tim Jeffers, Joe Howlett, Mike Smoak, Mike Corbin, and Mike Shumate know the actions of their “co-participants” were “impeding” the investigation of the

Nominations Committee Member Randall Townsend? Yes as the HCSO Internal Affairs officers and Pinellas Internal Affairs Deputies admitted the illegal and inappropriate conduct of their fellow officers but their superior made additional threats to plaintiffs to obstruct and harass Plaintiffs herein.

Did the Superior “law enforcement officers” of the co-participants listed as defendants herein know that the co-participants were promoting a “fraud” or “multiple frauds” and “FBCCP By-Laws” violations in order to present “a sham diversion” and “false” testimony and evidence by Ron Beck, Karen Harrod Townsend and Scruggs et al to the court of Judge Raul

Palomino on 11/15/2001 and at other times by the co-participants listed as defendants herein by their Mens Rea acts against Randall Townsend during the litigation of these cases? Yes! And even more emphasis now exposes the criminal endeavor all co participants try to still conspire to control to per the Reves case show deprivations against the “whistle blowers”.

Did the “sect agents” knowingly and willfully and intentionally assist the “sect” in violations of the Plaintiffs, and do these deprivations still continue even openly in defiance of the By-Laws, Constitution and Federal and State Hate Crime laws?

The claims made by CPCS Pastor Dr. John Berry and Townsend per his FBCCP Duties and Rights have been proved all true as: violations of the By-Laws have been done by the “bad faith” “self dealing” actions of the “Sect” and “sect agents; the “sect and sect agents” have intentionally and knowingly and fraudulently conspired and diverted the FBCCP enterprise actions and members quest; and continue to block rights of these plaintiffs as with family rights and as religious persons and tax payers. These defendants intentionally ignored the warnings of Judge Palomino on 11/15/2001, and unlawfully impede Randall Townsend and his children when Judge Palomino ruled in the favor of Townsend in cases 01-15813 and 01-15814, plaintiffs brought solely for the purpose as a “sham” to defame in

a false negative light Townsend and to detain and fraud defendants in a false positive light to scare persons no to join the claims of Townsend. Even the Divorce Injunction of November and December 2003, done by Judge Timmerman knowingly after Scruggs was terminated with the Ex parte conspiring of Scruggs, Gray and Attorney Turmel and defendant and “others” seeks to permanently continue the “sham” and prevents Townsend and his children both adults after July 9, 2003 to detain their free practice of Life, Liberty and Pursuit of Happiness so as to prevent prosecution of defendants to the fullest extent of the law.

CONSTITUTIONAL QUESTIONS

HOW IS DISMISSAL NOT A VIOLATION OF CIVIL RIGHTS?

HOW IS THIS DISMISSAL NOT A VIOLATION OF CRIMINAL LAW?

HOW IS THIS DISMISSAL NOT A VIOLATION OF CIVIL LAW?

HOW IS THIS DISMISSAL NOT A TORT VIOLATION OF THE FBCCP BY-LAWS?

HOW IS THIS DISMISSAL NOT A PREMATURE PREJUDICED INJUSTICE TO “DUE PROCESS” BASED ON THE PROPONDERANCE OF THE EVIDENCE OBTAINED TO DATE AND THE ALLEGATIONS OF WHAT IS YET TO BE GAINED BY SPECIFIC IGNORED DEMANDS NOT A “FISHING EXPEDITION”?

As said above and in all related cases documented herein and the patterns of the criminals and criminal enterprise is more than proved

per the standard our Constitutions require for judgement to be rested in the hands of the public as Church members or a citizens juries!

STANDARD OF REVIEW

In Commercial Union Insurance Company v. Sepco Corporation, 878 F. 2d 1395 (11th Cir. 1989), “because the district court did not consider extrinsic evidence in interpreting the contract, we review the propriety of the district court’s construction de novo”. The Constitutions requires a jury!

Clearly defendants ignore the FBCCP By-Laws they intentionally Ignore and violate.

CONCLUSION

Will this court continue to now knowingly tortuously violate the FBCCP By-Laws as it has done before maybe due to the intentional malfeasance and frauds of these defendants?

In Aisenberg, we may never truthfully know “who abducted the baby” but in this case we do know who are the “scinters” who abducted and still detain the innocent kids and now tax payers as a “sham” to conceal the “self dealing” at tax payers expense. It is these defendants and “others” more discovery will expose and for which these defendants try to keep unlawfully his from this Respondent now Plaintiff/Appellees herein still with clean hands advocating the “1993 Voice of the Members”. Emphasis added.

The prejudice and bias cannot be overcome until a judge independent of the “false reports” and “wrath” and prejudiced control of Attorney General and now Governor Charlie Crist, Former Governor Jeb Bush and The Florida Bar Executive Director John Harkness and Legal Division Director John T. Berry cannot be given due process.

Townsend's Florida Bar, JQC, and 05-3977 Report to Gov. Bush in 11/2005, exposing the criminal acts of Heather Gary and other defendants as Jane Christy said, “your complaint got thrown in the trash!” JQC Executive Director Brooke S. Kennerly wrote “the commission lacks jurisdiction”. And attorneys for Jeb Bush said the Governor could not intervene. The law states differently and so do other cases wherein the elements show they or even this 2DCA acted when finally your charges were made against Heather Gray just as you dismissed when Townsend first exposed her in 2004 to you that she was intentionally concealing criminal acts of Charles Scruggs Et Al now connected again for this Court with other co-participants.

Were defendants given unlawful prejudicial privilege because: they were deputies or because of who they were as friends of HCSO Gary Terry et al or because they were needed by Bush, Crist, Harkness and Berry to be anybody that opposes Randall Townsend? They were connected to Pinellas County Jail Deputy Captain Tim Jeffers and needed to conceal his

Deputies Roles in the Terry Schiavo case as Tim Jeffers worked with Mr. Schiavo. Gibbs was retained to represent the family of Terry Schiavo on behalf of Jeb Bush and argues his position that a Church or government should not destroy a life or a family? But in his actions for the “sect” his actions show he condoned the opposite even denying Townsend the right to attend the FBCCP Business Meetings and CPCS School Board meetings regarding the abuse to his children as documented by multiple doctors and professionals.

Because Deputy Jeffers was prejudiced with HCSO Gary Terry as a co-deputy and their joint effort to reunite a family rather than in this case to use the Aisenberg criminal constructive frauds pattern?

Gray was retained at the directive of Charles Scruggs for the purpose of the criminal enterprise with her to continue the malfeasance of defendants and states the violations of laws and duty and jurisdiction of “law enforcers” and proves these “officers of the courts” defendants collusion to intentionally do “ineffectiveness of counsel” with judges per the Strickland v. Washington, 466 U.S. 688, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984), per the U.S. Supreme Courts articulated two- prong text to determine if counsel is ineffective. All did specific errors and omissions by not requiring deputies and Coast Guard Shumate to produce all records per demands since

1997, to Member/Respondent(s)/Plaintiffs. All did specific errors and omissions by not requiring deputies, pastors and Coast Guard Shumate and themselves to not do frauds in a Court of Law. [Howlett on 11/15/2001, and Shumate on 1/23/03, and at other times by Counsel or Karen Harrod Townsend]. Second, the deficiency must have prejudiced the opposing party by depriving them of a fair “day in court”.

Without production of the True FBCCP Records and production of Truthful testimony by these defendants in collusion, Respondents now Plaintiffs still cannot protect themselves of Faith Based Contract or Constitutional Rights.

Plaintiffs have more than required proved Jeffers et al has unlawfully “impeded” their rights as a “internal Church body to handle its affairs” or as a victim to redress their grievances to the government or to have their “fair” day per due and equal process in the courts especially by the acts of this judge the Crooks are Cooked. This 2DCA cannot approve of the dismissal as a matter of law as defendant Gray in July 2009, per her “inactive” and thus could not represent herself, or herself as any defendant as it is proved she never intentionally lawfully advocated the rights of these Plaintiffs.

CERTIFICATE OF FONT COMPLIANCE

I hereby certify that Times Roman Numeral 14 Point was used per the requirements of Florida Rules of Appellate Procedure 9.210(a)(2).

Respectfully submitted,

Randall C. Townsend, Pro Se
FOR ALL APPELLANTS/
PLAINTIFFS PER F.S. §617
P.O. Box 21,
Odessa, Fl. 33556
941 350 2677

By: _____

Randall C. Townsend

ON: _____

www.Judgeoneyourself.com

Certificate of Service

I hereby certify that a copy of the foregoing was provided by U.S.
Mail this _____ day of _____, 2010, to the clerk of the 2 DCA at
1005 East Memorial Blvd. Lakeland, Florida 33801 and Heather Gray et al
at 10011 Cannon Dr. Riverview, Florida 33578.

Randall C. Townsend, PRO SE.

BEFORE ME, THE UNDERSIGNED AUTHORITY, PERSONALLY
APPEARED Randall Townsend, WHO PRODUCED THE FOLLOWING
IDENTIFICATION AS A FLORIDA DRIVERS LICENSE _____
ON THIS _____ DAY OF _____, 2010, AND KNOWN BY
ME TO BE THE PERSON WHO EXECUTED THE FOREGOING
DOCUMENT, WHO UPON BEING DULY SWORN AND
CAUTIONED, TOOK AN OATH THAT THE STATEMENTS AND
THE THINGS CONTAINED THEREIN ARE TRUE AND CORRECT, TO
THE BEST OF HIS KNOWLEDGE, INFORMATION AND BELIEF.

WITNESS MY HAND AND OFFICIAL SEAL THIS ____ day of
_____, 2010.

NOTARY PUBLIC: _____