STATEMENT REGARDING ORAL ARGUMENT

Appellants will gladly address this court face to face to: detail each issue; present facts; and answer any and all questions; if welcomed and allowed by this court.

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I. Whether these Appellants especially now after all are fully informed of the 2008 finding of this Eleventh Circuit Court of "Ineffective Counsels" including this Defendant Heather Gray (disbarred[i] for frauds and abandoning clients rights she was to argue which is confirmed by the Florida Supreme Court Chief Judge Canady and the 5th DCA), and the length of this case again back through the State Courts (13th Circuit, 2nd DCA, 5th DCA, Florida Supreme Court) it is proved this "ineffective counsel" is the intentional ongoing results of the Mens Rea plot for "ineffective counsel" by "Whistle Blower" Townsend's Attorneys (McCarthy, Landis, Popper, Chapin, Gibbs, Grant, Scruggs, Gray, Dickinson & Gibbons) and the highest levels of "Government Persons", "Alias Law Enforcers" and "others" to: (1) never let Townsend Defendant's allege as a non-lawyer "dumb ole country boy" Civilly or Criminally discover truth to prove his claims; present truth of crimes to a jury; or look "honest" as a legal or ethical authority of his or "others" to his family, peers, and Church Members: Civil Business Rights; Civil Rights, His Church and Members Rights; (2) Never let Townsend make Charges of Reporting Criminal Activities of Defendants and "Others Doe"; to a jury or to his "Church Members"; (3) With "Government Persons" continue The "ineffective counsel" plot conspired to conceal their

malfeasance and thus abuse Townsend's rights of "Discovery"; reputation, money and keep him from his business rights for over from 1987-1993, resulting in the loss of his business by Counsels Torts and then to use more extortion in their Concert of Actions, then they extorted and kidnapped his Children in 1999 by proved fabrication of evidence and prejudice from "Government Persons" to put Townsend in a "False Public Light" to the Church and Citizens whom Defendants and "Others" still conspire to deceive have ever had "Competent Counsel" for an "Honest Day" in: Civil Courts on issues since on or about 1987; or also by the conspiracy of these "Government Persons" intentionally doing "ineffective counsel" so to "impede" Townsend to never look "truthful" about reporting their Torts as in the invasion of our privacy and contract of membership of the FBCCP/CPCS as a Religious Society since 1994; as the previous findings of this Eleventh Circuit Court was in a polite way admitting "ineffective counsel" knowing "Counsels" and "others" may be or are involved in criminal acts now confirmed.

II. Under the law of Joint Liability, if this Honorable Eleventh Circuit Court found in favor of Townsend and those for whom he speaks suffering "ineffective counsel" in 2008, naming Counselors (Gray, Scruggs, Grant, Gibbs, Denny, and "other DOE") and Florida Supreme Court Chief Judge Charles Canady in 2011, due to acknowledging "Past" not Future "prejudice" causing Extrinsic , Constructive, Intrinsic, and Collusion for "Fraud on the Court from "ineffective counsel" and "fraud, collusion, and arbitrariness" with Judges intentionally proved in constructive fraud against Townsend ET AL since 1987, therefore disqualified: himself in the person now as the Supreme Court and as a Judge having served in the 2DCA in the underlying cases issues during the frauds of Gray to reveal all prior attorneys and judges frauds and Denny's Firm frauds in 02-03812 Townsend v. Beck Case; the 13th Circuit; the 2nd DCA; the 5th DCA; the entire Florida Supreme Court; and Judge Canady allowed a three judge panel to then dismiss the related case claiming "no jurisdiction" as a fault this Heather Gray was to honestly serve her clients writing an appeal covering all issues during her representation period of 3/14/2003, when she was immediately paid the full retainer she requested until her admitted abandonment about 8/2004, albeit the failure to do the promised services she made of 3/14/2003, show abandonment of "honorable services even starting 3/14/2003, by her fraudulent inducement for her services she never intended to produce, how can Citizens not see this as constructive fraud of all "Government Persons" who block what is to be per our Florida Constitution Article I. Section 3,

Jury issues, not Judge with "Government Persons" Collusion issues arbitrarily self empowering itself against Citizens Jury and innocent until proven guilty by a jury of ones peers rights as verses the unbiased ruling of the 7th Court of Appeals claiming basically if the Judge is Prejudice and in collusion then no Honorable Court or Day in Court ever existed?

III. Whether the underlying criminal acts (Drug Use, Fraud(s), Extortion and Paying and expecting Kickbacks) by Charles E. Lane Jr. (a.k.a. Sabal Marketing Inc. and now Sealane Marketing Inc.) and the cover up of such "fraud, collusion and arbitrariness" by Townsend's Counsels "Chapin's/Popper/McCarthy's and "others" Gang" is not an ongoing continuance of the original criminal felony acts and frauds by Lane and his childhood friend as his attorney Charles E. Williams Jr.(Williams) and their "Gang" which the victims herein have never had "Due or Equal Process" due to the Mens Rea Concert of Acts of Counselors McCarthy, Popper, Bruce E. Chapin (Chapin), David Gibbs III (Gibbs), John Grant (Grant), Cary Gaylord, Charles Scruggs III (Scruggs), Heather M. Gray (Gray), Dickinson & Gibbons ET AL (Denny and Rolfes) and "Others" in the highest levels of State (Governors, Supreme Court, Florida Bar Officers, FDLE) and Federal Government (Bush, Martinez and "Others") who continue their "criminal enterprise" to never let Appellants have their Constitutional and Contract Rights as when one follows the money trial, Quid Pro Quo Acts and the "under color of law" political (MacKay's/McKay Plot with Bar Officers as Chapins Plot with State Attorney McCarthy and "Others") and "false light defamation" plot against Townsend as Townsend has "proved" truthfully advocated since 1987 and admitted by Defendants the Concert of Actions shows per the Robinson v. Weiland 5D05-2380 Ruling, the Mens Rea Criminal Minds and Constructive Extrinsic Fraud by "Fraud on the Court" even Appeals Courts first using P.C.A.'s to keep Appellants deprivated of all Defendants and "Others DOE" per the Robinson rule and Canady's Rulings not just "Fraud on the Courts" and Frauds on Appellants but Major Crimes and still in defiance to this Eleventh Circuit Court even ruling ENBANC.

III. Whether this trial Judge Elizabeth Kovachevich is as the other judges since Chief Ninth Circuit Judge Rom Powell now named as Defendants in this case is acting fraudulently and "under color of law" and by bias (As Admitted by Rulings of Florida Supreme Court Chief Judge Canady, 5th DCA) likewise abusing her discretion as to what is "Short and plain" to conceal her co-participants verses "seeking justice" but instead continuing the RICO Quid Pro Quo Plot of these Defendants and "others" and violating

the Constitutional Rights of these Appellants as each claim of Appellants has been "impeded" from our "Due and Equal Process"[ii] contract(s) and Constitutional Rights to our children, our property, our Religious Contract Rights, Civil Rights, "Discovery" and a "Jury Trial" since 1987 "impeded" by "alias" "honest services providing" "Government Persons" continuing to conceal themselves and "Others" Concert of Actions.

IV. Whether Judge Elizabeth Kovachevich is proving by her rapid Dismissal from the dates on the docket even seeming to file the Dismissal before Townsend's deadline to file the Amended Complaint and wording of her Order she (as Appellants Allege because Townsend since 1987 refuses to: violate the law; fail to report violations of the law; and or take a bribe to conceal criminal actions of Lane and his co-participants, including Counsels, and Judges as this matter since 1987 is a "jury" issue) is continuing in defiance of this 11th Circuit Courts finding of "Ineffective Counsel" which specifically was advised to and advised to lower court Judge Martha Cook knowing Gray was being disbarred since 2009, and even during Grays appearances during 8/2009 through 1/2010 in Case 06-6005, had agreed not to practice law since 8/2009 and also was in default as said by Judge Gomez in 2007, and then recused himself the second time acknowledging his Exparte "Fraud on the Court" collusion with Gray, Scruggs and "others" from his Orders from above, as now Judge Kovachevich with her Co-Participants as Judges of the 13th Circuit, 2nd DCA, 5th DCA, Florida Supreme Court and Middle District Tampa, intentionally continues the RICO, Anti-Trust, Extortion and Fraud Claims against Appellants by dismissing Appellants case prior to and or "impeding" Appellants "Discovery" as Judge Orfinger of the 5th DCA ruled 9/1/2006 as Judicial Error of Judge Powell's "Gang" since 1990's as those involved in this same case "impeding" the "Discovery" of personal and business records from Lane (a.k.a. Sabal, Sealane), Appellants Counsel(s), Government Persons, FBCCP/CPCS and "others" and even what by law is to be "Public Disclosure" that Appellants alleged and have at later times proved connect the Mens Rea motives of Defendants concealing their malfeasance to Townsend and those for whom he speaks and Defendants paying and taking bribes, payoffs, Quid Pro Quo rewards and co-participating in criminal acts leading to the violation of FBCCP Contract and Religious and Civil Rights from the actions and Defamation of FBCCP Registered Agent Senator John Grant allegedly to Townsend and these Non-Sect Appellants giving us truthful legal advice yet as exposed by his E-Mails to the Sheriff and State Attorney verse the Orfinger Ruling a fraud as Townsend is now proved right

of all his claims, but Grants "ineffective Counsel" to the FBCCP non-sect members since 1994 is leading to and then resulting in the kidnapping of Townsend's children since 1999-now and deprivating Civil and Contract Rights of FBCCP/CPCS and these Religious Society Members as Tax Payers still assisting Lane ET AL, Jeffers ET AL and their Co-Participants and thus giving these victimized Plaintiffs/Defendants/Respondents/Plaintiffs/Appellants no relief or restitution and no other remedy at law from ongoing deprivations as is it obvious to say it is fact that Scruggs, Gray, Denny, intentionally was advised to "impede" Townsend and those for whom he speaks as the first client Gray seems to "abandon" which then led to her for the State Attorney's and Public Defenders office become the "Gray Hole" for many of their cases.

V. Whether these issues and "Government Persons" actions can be separated as only or solely Townsend issues or FBCCP issues or Citizens against Political Corruption Issues or must all causes be combined because these same Attorneys as now Defendants are as from 1987 the "ineffective counsel(s)" in a concert action "impeding" public production of documents proving Appellants/Plaintiffs Quid Pro Quo Claims their Counselors and "others" becoming the "Government Persons serving and self dealing for their own interests" such as McCarthy and Gray as State Attorneys Office Members concealing Scruggs who himself is being in a conflict of interest being paid by the same QUID PRO QUO Government Agents his co-defendants from City, County and State Funds, "impeding" all Appellants to able to "impede"[iii] Townsend's claims, or Scruggs, Gray and Dickinson & Gibbons who if supporting Townsend's Claims must "bite the hands that feed them" via their co-participants, or County Officers with personal motives (Linda Chapin, Pat Bean) or Judges as Judges Powell, Stroker, Strickland, Perry, Orfinger and "others" as recused by the 2010-2011 Orders of Florida Supreme Court Chief Judge Canady including himself and Governors for their own agenda's even hiring or rewarding Quid Pro Quo Townsend's "Informed" Counselors (Gibbs since 1991, Ken Conner (Conner) since 1994, with Mel Martinez and "Others") and or Jeb Bush using his brother George W. Bush and Conner and Conner's former legal co-partner Mel Martinez also former Orange County Commission Chairperson, Director of HUD, U.S. Senator and now an executive with J.P. Morgan, to obtain "impeding" assistance of the Federal Agencies and FDLE Officers (Tunnell, Bailey) and Attorney's Generals (Butterworth, Crist, McCollum, Bondi) or Florida Bar Officers (Harkness, Berry, Board of Governors, Grievance Committee Members) or Federal Persons (Mel Martinez and

Robert O'Neill) or Sheriffs (Rice, Coats, Gee, White, Grady Judd, Santa Rosa via Coats) concealing crimes they admit being done by their own deputies (Jeffers, Howlett, Smoak, Corbin, Santa Rosa County) as proved with "singularity", personal motives of bias and prejudice and reversal of their earlier rulings proving with their same goal of concealing these "ineffective counsels" and their co-participants plot of "never let Townsend have an Honest day in court or have a jury trial or get discovery to prove Lane is from 1987-now using money due to Townsend was participating in criminal acts of: drug abuse, extortion, bribery, kickbacks and multiple frauds leading to the deprivations of Townsend: being kidnapped from his children since 1999 by the now former wife, Karen Harrod Townsend and her maternal family of which her brother Steven is an employee of J.P. Morgan Companies at various times; non-production of Lane/Sabal, FBCCP, CPCS, SunBelt Records); loss of Townsend's incomes by torts (Lane, Popper, Chapin and "others"); thefts of FBCCP Designated Funds (via Jeffers and "others" since 1994); attempted murder; batteries; abuses of children; illegal drug uses; intentional infliction of emotional distress on children and the elderly and "others"; violations of Religious Contract Rights per the FBCCP and CPCS By-Laws and Contracts (review of all documents, assembly, vote), Attorney/Client Contracts[iv], Civil and Constitutional Rights; and other various laws.

VI. Whether this Court will stand by its 2008 Ruling of "Ineffective Counsel" and thus Order for Appellants our Demands for: All Records Production; Writs; Arrest Warrants on Defendants and "Others DOE" and Restoration of our Property, Civil Rights and a Jury Trial of all Issues judged as our Constitutions require by a "Jury" of our peers and as our FBCCP By-Laws requires since 1994, when "Government Persons" Deputies and Counsels are proved to violate "Free Will Baptist" Rule of Law and still do "fraud, collusion and arbitrariness[v]" still to Breach our Contracts, Unlawfully Invade our Privacy and Take our Property by fraud and threaten us with arrest if we use our First Amendment Rights of Speech and Assembly.

VII. Whether this Court will let stand the fraud and "Undue Process" of lower courts and other "Government Persons" in collusion using fraud for their self-dealing, unjust enrichment, invasion of privacy, unlawful search and seizure to conceal their crimes and other violations of Contracts, Rules of Civil Procedure and Civil and Criminal Laws knowing their superiors will rule Per Curium Affirmed (PCA) without explanation their legal basis of

said rulings as now it is well proved in this case the “PCA” trickery was used for fraud of self-dealing “Government Persons”, unconstitutionally deceiving citizens per the intent of the voters of Florida based on “Government Persons” deception in their interpretation to restructure the courts for a more streamline system however now however shown verses the use of Jenkins v. State or just simple “Dismissal” without legal “Due Process” to “impede” discovery of fraud for a Superior Court to aid and abet corruption of a lower court or “Government Persons” from whom they received Quid Pro Quo unjust enrichment.

Conclusion

CERTIFICATE OF TYPE SIZE

CERTIFICATE OF SERVICE

TABLE OF CITATIONS

CONSTITUTIONS: PAGE

First Baptist Church of Citrus Park By-Laws and Constitution…

Florida Constitution

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STATE OF FLORIDA STATUES:
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CASES:

FEDERAL CITATIONS:
Levine v. United States, 362 U.S. 610, 80 S.Ct. 1038 (1960), citing Offutt v. United States, 348, U.S. 11, 14, 75 S.Ct. 11, 13 (1954). "A judge receiving a bribe from an interested party over which he is presiding, does not give the appearance of justice." "Recusal under Section 455 is self-executing; a party need not file affidavits in support of recusal and the judge is obligated to recuse herself sua sponte under the stated circumstances. Taylor v. O'Grady, 888 F. 2d 1189 (7th Cir. 1989). Further, the judge has a legal duty to disqualify himself even if there is no motion asking for his disqualification. The Seventh Circuit Court of Appeals further stated that "We think that this language [455(a)] imposes a duty on the judge to act sua sponte, even if no motion or affidavit is filed." Balistrieri, at 1202.

FEDERAL LAWS:

CIVIL RIGHTS ACT

HOBBS ACT

RELIGIOUS SOCIETIES ACT

RICO

RULES OF PROCEDURE:

STATEMENT OF JURISDICTION

This court has appellate jurisdiction pursuant to 28 U.S.C. 1291 and 28 U.S.C. 1294 because the decision from which the appeal is taken is a final decision of a district court from a judge or judges proved in self-dealing, prejudice, collusion, fraud and arbitrariness on honorable courts located within the U.S. Eleventh Circuit trying to conceal their frauds and the frauds of others in this country insulting the integrity on the Honorable Courts of this Country and Citizens.

STATEMENT OF THE ISSUES

1. Whether Appellants ever had legal counsel or from day one in 1987;

or

because of "Ineffective Counsel" negligence not to get as Townsend demanded Subpoena's for the Joint Venture Contract and a Court Appointed Receiver to fully expose the crimes of illegal Lane and his "Gang";

have

Appellants Lawyers, Judges, Government Persons and Others conspired to conceal their resulting constructive frauds and Fraud on the Court.

The 7th Circuit Court of Appeals says if the judge is prejudice and involved in the fraud it is an Extrinsic and Constructive "Fraud on the Court" as the Judge is not the "Court" but only an officer of the Court.

This case shows the highest level of Government Persons have ordered judges to or of own their own choice seeking a Quid Pro Quo reward do Fraud on the Court to conceal their Government Superiors Crimes and Crimes of other Co-Participants.

The U.S. Supreme Court has taught us the Watergate issues showed the President was not above the law. In this case the direct "fraud, collusion and arbitrariness" of Defendants is even clearer.

STATEMENT OF THE CASE

1. President George W. Bush's own words and actions are used as Defenses of Appellants about what he said about his own actions concealing his brother Jeb being informed since 1994, and the "Jeb Gang including his friends as Attorney's Ken Conner, Mel Martinez, David Gibbs III, John Grant, Pam Bondi, at relevant times Charlie Crist and "his Gang", and others" needing Powerful Florida Republicans like Senator John Grant also as Registered Agent of our FBCCP/CPCS Church/School, and these others, and their words against those of Iraq and Saddam to define the Crimes, Collusion, Fraud, Felonies of Government Persons and "others" in this case

that is beyond any logical belief and also impossible to fully detail since "discovery" has been "impeded" since 1987 to not expose "ineffective counsel", "kickbacks" and "Quid Pro Quo paybacks to these "Government Persons" concealing themselves for their political advancement and to stay out of jail as hypocritical thugs worse than kidnappers and murderers.

Even George W. Bush and his agents required Saddam to get a fair trial per the law because the world was watching but in this case there is a conspiracy by Bush and his "Government Persons" to never let Townsend since 1987 to have a "jury" in the Courts and then even in our Church to review the truth as publication of records will show criminal acts concealing political contributions and kickbacks used as "Witness Tampering" and extortion.

However in this case, Senator John Grant has written E-Mails to Sheriff David Gee, State Attorney Mark Ober and Townsend and who knows to other person and for how long, making threats that Townsend should be "mentally evaluated" and "Baker Acted".

Townsend alleges Grants Gangs "Frauds" began in "impeding" the "Church Supreme Courts" Ethics Investigation Townsend and CPCS Pastor John Berry started in 1994 when Administrative Pastor Elbert Nasworthy admitted in the October 1994, Quarterly Business Meeting he and the Finance Committee did violations of the FBCCP By-Laws and possibly the IRS. In 2006, when "partial records" were Ordered to be produced finally after of "Fraud, Collusion, and Arbitrariness" by "Grant Gang" using frauds of Finance Committee Members and Trustee's as Sheriff Deputies (Tim Jeffers and Joe Howlett) concealing truth and producing fraudulent reports to the FBCCP members, these vile comments and the "Frauds" Grant finally wrote of in his e-mails to Townsend, Sheriff Gee and State Attorney Mark Over, his now proved illegal threats and frauds caused Townsend the abduction of his Children since 1999, and criminal acts done in our Church because the John Grant/Gibbs/Conner/Martinez/Bondi/McCarthy/Bush Republicans had to Conceal what they knew about the Chapin/Chiles/MacKay Democrats Crimes done since 1987, as Townsend reports herein.

2. Appellants per "Whistle Blower" Townsend, honest members unanimously elected, F.S. 617.083, in 1994, to their Officers Position of the First Baptist Church of Citrus Park and subsidiary ministry Citrus Park Christian School, (FBCCP/CPCS), "Supreme Court" as the Nomination Committee and having had the most self-taught expertise in the pending legal issues facing the FBCCP in the areas of their Eminent Domain Case

was also unanimously nominated and elected to the position of Long Range Planning Committee Chairman per the Nomination of Retiring Pastor Harold Warner and CPCS Principal John Berry, as Townsend the younger man, to per the By-Laws: (1) see the Church/School and 1993, Members through their "Mission Growth Plan" to 1. Build a larger Sanctuary. 2. Expand CPCS to the 12th Grade to educate and be able to minister throughout the world. 3. Build a Retirement Complex; (2) then assist Principal Berry expose and stop the "Sect" and their actions that formed with the arrival of Elbert Nasworthy, new "pastors" Ron Beck, Herman Meister William Brown, David Ferguson with their "unlawfully appointed" gang and "Others" unknown illegally acting per the By-Laws and diverting funds without reports and approval of the Members as required by the By-Laws.

3. Appellants as FBCCP Members and some "Others" knew Townsend was also trying to get justice for his business Future Marketing and his family in legal matters stemming from a "Joint Venture" (JV) Business dealing gone very wrong with a former partner Charles E. Lane, Jr. a.k.a. Sabal Marketing since signing a Joint Venture contract on 8/7/1987.

4. It is fraud to say that Townsend at any time from 1987, should be prevented from presenting his claims to a jury or his peers or:

a. obtaining full production of documents for truth of his contract and illegal activity claims or from defending himself from Lane's GANG Counter suit from 7/5/1988, or from later illegal torts and estopped claims of Lane with other defendants to expose Truth, Facts and illegal acts proved by illegal acts, extortion and Quid Pro Quo kickbacks and witness tampering in collusion with these Defendants and "others DOE";
b. his business rights with his clients due to an alleged non-compete clause with anyone including "Lane's Gang" or their former employer Nova Sales;
c. assembly with his abducted against their will children since 10/20/1999, FBCCP/CPCS members since 9/8/1999, trying to gain relief from "Sectarian" criminal acts or business ventures since 1987, seeking to gain relief from RICO and "other Criminal Acts from "Lane's Gang", Joe Ligori and "Others" (Townsend and Lanes former Bosses at Nova Sales) and "others" able to do Quid Pro Quo Acts and "kickbacks";
d. presenting these truths and obtain truthful records production of FBCCP Records since 1994 and related Business Records since 1987 to his fellow Church members or to a jury of his peers to decide vindication

and restitution of these Appellants and punishment of these Defendants and "others DOE" for their concert of criminal actions even in the early 1990's Attorney Popper called RICO.

5. As Federal Judge James Moody Jr., in a Status Hearing on 3/15/2007, in the underlying case this Court said "Ineffective Counsel" yet now proved in this related case paraphrasing said,

"This case sounds like a case about Undue and Unequal Process to me so go back (per Fed Rule 8) and give more details on each one."

Townsend, honoring what Judge Moody ruled and what this Eleventh Court said, Townsend included and informed the 13th Circuit Court Judges and Defendants through using the timely filed ongoing Townsend ET AL v. Gray ET AL Case 06-6005 now timely brought through the 2DCA, Florida S.Ct., 5th DCA, Florida S.Ct. and then to the Federal Middle District, Tampa.

6. The Undue and Unequal Process begins since 11/97, when "ineffective counsel" was given by Attorney Patricia McCarthy, and as Townsend demanded, "Get Subpoena's on Lane so Townsend can read the "Joint Venture Contracts" to not do tort interference and Set up a Receiver so Townsend can get paid and know his Contract Rights. If Judge Moody gave this directive in light of him knowing about the Robinson Ruling of 9/1/2006, confirming Townsend then the door that Judge Merryday, Wilson and Judge Kovachevich and "Others" tried to close shows fraud by those who "impeded" the Moody Ruling since 3/15/2007.

By "Fraud, Collusion and Arbitrariness" the directives Townsend retained and paid McCarthy, Popper ET AL, Chapin ET AL, Gibbs ET AL, Grant ET AL, Scruggs, ET AL, Gray ET AL and "others" has yet to be done because it will:

(A.) Confirm Townsend is truthful against Lane's Gang and the "Sect" and their "Government Agents";

(B.) Exposes and convicts Defendants of Felony Frauds and Thefts;

(C.) "Ineffective Counsels" and "Other" Government Persons and non-Government Persons Criminal Acts" as Townsend has advised since 1987, per the Joint Venture Contract and the "witnesses" truthful testimony and per the FBCCP/CPCS By-Laws Contract and per the Constitutions and Laws Defendants were to obey.

Why all the "threats" to Townsend to "Shut Up" and since 1999, Don't contact your kids or your Church, what do Defendants and new judges fear other than the threats from their other Judges and Superior Officers?

Is their pattern not obvious to "use the spouse"? Chapin uses his wife Linda, Jeffers uses his wife Karen, Beck uses his wife, April and Crenshaw uses his/hers as a Judge appointed by Jeb Bush to the Circuit Court and by Charlie Crist to the 2DCA when her husband is a high ranking Hillsborough County Sheriff Deputy which Townsend is suing Bush, Crist, HCSO and the "outrageous" list of Defendants and they used mine to try to destroy me or get me to "comply" but I refused to take their bribes or let their threats stop me. Emphasis added.

7. This is what Townsend keeps to do to speak for now all these Appellants again in this timely filed ongoing related case howbeit Townsend alleges intentionally unlawfully delayed all the more by ongoing acts McCarthy started with Townsend's other "ineffective counsels", "Government Persons" and Federal Judge(s) Merryday, Wilson, Conway, Presnell and back through Lower Court Judges and now again Judge Kovachevich.

The more "Discovery" of Records since 1987, is allowed the more their Concert of Illegal RICO Actions is exposed violating Townsend and "others" as Tax Payers.

8. This little lie turns into a bigger lie Concert of Actions by Townsend's Counselors Patricia McCarthy of FOCHT & McCarthy, (McCarthy) and David H. Popper (Popper) of Austin Lawrence & Landis P.A. as skilled attorneys alleging to "Honestly Serve" Townsend began since about or before 11/1987, covering up their negligent counsel as they accepted the frauds of Attorney Charles E. Williams, Jr. concealing "Lanes Gangs" illegal acts including kickbacks and witness tampering as confirmed by the McCarthy Letter to David Popper of March 8, 1988, Exhibit xxx herein and as Exhibit E556 in Florida Bar Complaints **93-31, 690 and 691 and 692** (Florida Bar Complaint Exhibits are noted as E-xxx) and the Letter of David H. Popper of April 14, 1988, Exhibit xxxx herein and E-565, thus delaying Townsend getting Subpoena's and a Court Appointed Receiver on Lane as Townsend demanded in several verbal demands and written letters (Exhibit xxx May 26, 1988, E-xxx) to these Counsels. McCarthy, Popper and then Williams adding Bruce E. Chapin and his wife Linda Chapin ET AL in 1989, and David Gibbs III (Gibbs) since 1991 and John Grant (Grant) since about 1994 and these other Defendants and "Others DOE" continuing to conceal their malfeasance in the representation of Townsend's Contract and Civil Rights in Townsend's attempt to protect his Contracts and Business Rights upon learning of Lane and his "Lane's Gang" being discovered involved in multiple breach of the JV Contract and criminal acts since about

11/1987, thus resulting in deprivations against all Appellants for whom Townsend was elected to speak still seeking "Honest Services" per our Contracts and Civil Rights.

9. Yet Each of Townsend's and or FBCCP "Alias Law Enforcers", Attorneys, judges, and named Defendants and other co-participants has in these underlying court cases illegally and intentionally in collusion unlawfully by Pinellas County Deputy Tim Jeffers acting outside his County authority with other Deputies and their alias "Superior Officer" "impeded" Townsend and the FBCCP Church Members reviewing FBCCP Business records of Administrator Nasworthy's illegal admissions since 1994 and the frauds in settling the Eminent Domain Case by frauds of the "Nasworthy Beck Sect" and the frauds of Beck buying the 18105 North Gunn Highway 40 acres just so as Beck admitted "live in the country like my brother Donnie and have more bathrooms for my daughters" and members specifically questioning multiple frauds including: Tax Evasion; Unjust enrichment; $43,000.00 missing from the "Pastors Salary Fund" in 1998. The Beck/Jeffers/Howlett/Smoak/Grant/Gibbs ET AL Deputies Gang trespassed Townsend from the FBCCP since 9/8/1999 and "Impeded"; Assembly of a Jury and even the Church Counsel as a Jury; Civil Rights, Due Process and full discovery of records Townsend is due per contracts and or from being a counter defendant/respondent from criminal allegations of these Defendants estopped from asserting any defense by their fraudulent misstatements to now Appellants as which connects the money trail, unjust enrichment, extortion(s), continuing "under color of law" willful misrepresentation(s) and fraud(s) and fraudulent concealment of facts even by "ineffective counsels" and "law enforcers" per Fed R. Civ. P. Rule 8(a) continuing the running of the statue of limitations and their "Other" Quid Pro Quo self-dealings Townsend claims and proves speaking for himself, his business Future Marketing and his family since 11/1987, catching Lane in a Tampa Hotel with illegal drugs and diverting Townsend's money.

10.Due to the length of this case since 1987 and the ability of Attorneys McCarthy, Popper, Chapin's and "others" to use their "Government" Superior Positions in the Federal and State Government, U.S. Attorney's Office and State Attorney's office by McCarthy and "others" and Bruce Chapin using the collusion of his wife, Linda Chapin, as the first County Wide Chairperson Of the Orlando County Commission and able to require collusion with Governor Chiles and Lt. Governor McKay, 9th Circuit Judges, their Friends of the Florida Bar and "Others" as these Plaintiffs without

discovery cannot be denied their rights or be blamed for proofs Defendants and "Others DOE" have by frauds, extortion, voting frauds and Quid Pro Quo acts violated Plaintiffs now Appellants seeking justice for their Church and themselves.

11.Plaintiffs "Counsels" continually underestimated the extent of frauds of "Lanes Gang" and since 1987 or before, Lawyers, Judges and "Law Enforcers" have known of Counsels "Ineffective Counsel"[vi] and have allowed Counsels "Frauds" in their courts so victim Plaintiffs as Judge Kovachevich tries to do cannot be blamed as the victim messengers for the length or showing of criminal acts of Defendants in this case since 1987, as it is our Constitutional Right for a "Jury" of our Peers to be the "Trier of Facts" both in our Church and in our Courts per our Constitutions as Contracts and "Due and Equal Process" as the 7th Court of Appeals has ruled the "Orders" of a prejudice and corrupt judge are not "Final". Thus, "ineffective counsel" actually since 1987, by McCarthy, Popper, Chapin, Gibbs, Grant, Conner, Martinez, Presnell and all the "Others" to Townsend are "frauds" as now that Judges of the 5th DCA and Florida Supreme Court finally agree with Townsend in 2011 as Townsend alleged since 1992, even presented in Appellant Briefs (Exhibit xxx, herein) that the Biased Judge Powell Gang was "Fraud on the Court" and the Judge Powell Gang by Ordering Townsend to Produce Business and Personal Records in and through 1/1993 beyond the 1988 alleged Restrictive Clause had it legally had existed in the first place because of the frauds of the Lane Gang, or go to jail was intentionally RICO extortion and a violation of privacy and "undue and equal process".

12. This Townsend ET AL v. Gray ET AL Federal case is the result of Townsend still lawfully and timely seeking justice from a Jury, for himself and those who elected him to speak for them upon learning of the "ineffective counsel" ruling by this Eleventh Circuit, timely returned this information in the still pending Townsend ET AL v. Gray ET AL 06-6005, 9th Circuit, thus giving "Government Persons" the opportunity to still perform their Fiduciary and Contract Duties.

Townsend the "Whistle Blower" refusing to take a bribe, after receiving confirmation of his claims as being lawful from the rulings of Marva Crenshaw in 2006 (saying take this Summary Judgement against Beck and go after the others later and Shut Up I am trying to get you a lot of money), the 5th DCA 9/1/2006, and Fla. S.Ct. Judge Canady in 2011, is still

"impeded" from "Due and Equal Process" and restitution and relief and thus as victims of ongoing extortion and frauds files this timely federal case.

STATEMENT OF THE FACTS

1. What these "Government Persons" since Townsend's first attorney McCarthy, Chapin and "others" fear most is that "Whistleblower" Townsend will by presenting his case since 1987, prove to citizens just how corrupt our "Lane Gang" bribed and greedy elected officials and their Quid Pro Quo appointees and Agents really are and that there is no supervision of corrupt "Government Persons" and Others if it personally benefits select persons who live by making illegal Quid Pro Quo deals and taking bribes.

2. Lane at the demand of clients and associates was fired from Nova Sales, Inc. (Nova) a "Food Brokerage Representative Business". Lane began in about 1985, his own Sabal Marketing company. Lane then having been banned from all accounts except Publix and Albertsons (welcomed there only by some who received kickbacks or because they knew his daddy was Charles Lane an Executive of Publix Supermarkets) needed Townsend and Townsend's reputation to re-accuire Sabal alleged Contracts in Section 1. And to sell the Section 1. Manufactures (lines) in other accounts that Lane had been banned from contacting based on his past unethical and criminal acts. These clients and customers agreed to do business with Townsend through Sabal as long as Lane was not involved.

3. Townsend in 8/1983, had been promoted by Nova Sales, to the Jacksonville Office to replace Lane who was being removed from the sales division due to his unethical conduct. By 1985, the unethical conduct had increased and Lane was told to leave the company.

Between 1983 and 1987, Townsend had grown his sales market from about $4 Million to over $12 Million a year writing some of the biggest unexpected success stories ever sold for companies as Duracell, Old Spice, Loreal, Nononsense, Vidal Sassoon, Bordens, Gatorade, American Foods and "Others".

At the advice of several customers, Townsend in 1987, left Nova of his own will to protect his business reputation from unethical conduct being conducted by Joe Ligori, the former manager of Lane and Townsend and due to broken promises Nova failed to keep in giving Townsend raises and being promoted to the Board of Directors and running a new brokerage division.

4. Townsend leaving Nova worried Ligori who was in trouble with a lot of customers for his unethical acts and he and Lane (unknown to Townsend at the time) conspired to control the fact Townsend refused to sign a non-compete with Nova by Lane putting in the August 7, 1987, Joint Venture (J.V.) Townsend would notify Lane of any contracts Townsend acquired as many customers were eager to assist Townsend leaving Nova and Ligori. The agreement was Lane could not object unless some line harmed a current Lane income. In no way was Townsend restricted nor would have agreed to be restricted and the frauds of Lane showed Townsend was not restricted.

5. This alleged "Non Compete" clause however per the "Lane Gang" to conceal their frauds became a very twisted version of the facts as even though Lane was advised, met with the Townsend new contacts and signed "releases" and agreed he was not harmed until after 1/1/88, when Townsend demanded production of the Contracts so Townsend could separate from the Lane, the "Gangs" version changes.

6. With the J.V. after contacting the lines and finding out Lane did not have the contracts as broadly as he claimed 8/7/1987, the first task was begging permission for Townsend without Lane in the accounts but with Lane as an uninvolved Partner, (because he claimed he already owned contracts with the lines) for Townsend to be the agent for the lines and open customers doors that were permanently closed to Lane because of his past own unethical acts. Townsend was trying to give Lane a second chance benefit of the doubt but this was a big mistake because of "ineffective counsel" willfully ignoring the clients and Townsend about Lane and as later learned the crimes of Ligori and Williams and "others". (Excluding (Diversified Sales, Inc. a Wine Distributor as Townsend did not do business with the wine business and Lane only allegedly had that line for Publix).

7. At the 11/1987, breakup Lane could not expose the contracts and what Townsend had improved with each company relationship or Lane would be left with zero due to more exposure of his own unethical and illegal acts Townsend had discovered between 8/7/87 and 11/87 and later after Chapin and Popper were fired. Additionally, by exposing the contracts prior to 8/7/1987 or that none existed as Lane said, Townsend could by False Representations void the J.V. and thus no alleged "Non-Compete". Townsend could not produce all the original contracts prior to 8/7/1987, to

the attorneys so their advice was Townsend had to stay clear while they followed the legal process.

8. Counsels intentionally assisting in the frauds by Williams well more than the Black Law Rules allow to assist a client continue in illegal acts, Lane since 1987, was able to retain these same companies all these years by sub-contracting with companies like Brennan Sales and "Others" never disclosed which Townsend should never have been barred from splitting from the Joint Venture and could have been discovered but for the threats of McCarthy, Popper, Chapin and Williams to not interfere with Lane's unknown contracts still unknown in 2012. With each production of the contracts Townsend was proved "Truthful and Honest" and was by the "ineffective counsels" deprivated. With each production of contracts Townsend had from 1987 – 1993, the conspiracy was by Williams, Popper, Chapin, Judge Powell and "Others" that somehow Townsend had violated the J.V. and had to forfeit all income to Lane and could not in the future represent any lines and could not contact the clients. After the Townsend production of records in 1/1993, all Contracts Townsend had were lost due to intentional acts of Tort Interference with these Contracts assisting Lane and Joe Ligori in their frauds and kickback schemes.

9. Townsend alleges that the "Chapin Gang" greatly benefited by conspiring with Lane and Williams and violating Townsend:

First, jointly the attorneys took Over $50,000 from Townsend as legel fees for services they never performed (Get the Contracts and Get Townsend paid for his services) and actually did intentional frauds to: cost Townsend millions, produce fraudulent records, "impede depositions and discovery" and eventually the loss of his company, marriage and kids and still creating frauds with his criminal connections who do not now want it exposed how they originally conspired with "Chapin's Gang". Lane since by Townsend secured the Bonneau Contract in 9/1987 also gained the Foster Grant (FG) Sunglass line when the companies merged as Townsend had FG as his contract and Lane still in 2012 advertises on his new company Sealane web page he still has FG. The Bonneau and FG lines were both available and offered to Townsend but Popper said "NO". Bonneau even to get around the JV wanted to hire Townsend as an Employee, but Popper said "NO"! Townsend was told to even give up Contracts he had prior to 8/7/1987, just to not conflict with Lane.

Second, Townsend believes Lane by his bribery and kickbacks was able to require Publix executives to promote projects of Linda Chapin and in

the future for Mel Martinez and others. The chemistry between Bruce Chapin and Lane during the January 1993, Townsend Records Production at the Williams Law office was between them very friendly and as a victory to know how Townsend was paying them so much money and Townsend by Chapin was treated as the hostile party. Chapin used trickery, extortion of Powell would Order Townsend going to jail, and being charged fees for several hours just sitting around while Lane failed to arrive for several hours when Townsend refused to just leave all his 10+ boxes of business and personal records unattended in the law office of Williams[vii];

Third, They all kept their licenses to practice law and Townsend was left with no money and no company and in 1999 as a result of their ongoing conspiracy no assembly with his children or his Church and faced with criminal charges to defame Townsend further in a "false public light".

9. Shortly after the 1993 production of records of Townsend's income from new companies, Lane Ligori began Tort Interference with the Townsend Contracts. Ligori and Lane through William Smith's orders caused Townsend to lose the Rank Retail Videos line to Nova Sales. William Smith the former contact for Nova Sales while Smith was at Nononsense Panty Hose was suspected of kickbacks through Ligori's company Century Sales.

10. Kickbacks of all types were common by Lane and Ligori but those Townsend worked with understood Kickbacks to be unethical practices as at that time the Florida Legislature and IRS was investigating and exposing "kickbacks" as criminal acts. Ed Crenshaw of Publix had also written a new strict policy for Publix Employees but Lane violated the policy.

11. Thus never requiring Lane's Gang to allow "Whistle Blower" Townsend to review all the Lane Checkbooks and Credit Cards and depositions of several key business clients still since 1987 has proved a violation of "Due Process and Equal Process" since Lane completely reviewed all Townsend's records even after the requirements of the JV had expired in 1988. Chapin stated that per Judge Powell or you (Townsend) go to jail you must bring all business and personal records through 1/1993. Exhibit xxxx by Chapin was purely intentional fraud and extortion.

12. Judge Powell, Judge Stroker, Judge Strickland and "Others" was also informed as part of the conspiracy and fraud Powell claimed to ignore was the fact that Williams violated a Townsend 1992 Protective Order and

illegally obtained information on a bank account from Georgia that Defendants claimed belonged to Townsend hid in a secret account.

13. There was no doubt there is "fraud on an Honorable court" but when the "judge" and the attorneys and their co-participants are all involved in the conspiracy to continue extrinsic, intrinsic, frauds on the court no Honorable Court or Due Process exists instead this is called RICO and "Ineffective Counsel" as the 7th Circuit Court rules. This point of law and facts was legally made by Townsend in his earlier Appellant Briefs but was ignored by the 5th DCA and Florida Supreme Court but finally acknowledged by the 5th DCA in 2006, as Townsend learned in 2011.

14. Therefore notwithstanding the claims of Townsend proving the amount of Fraud, RICO, and Malfeasance done by McCarthy, Popper, Chapin, Williams, Lane, Powell and their "Co-Participants", Governors, Florida Bar Officers, U.S. Attorney's, Florida State Officers, since Gibbs by 1991, Grant, Bush, Conner, Martinez, Jennings since the Appeals courts using PCA or dismissals without requiring as Judge Orfinger and the 5th DCA ruled 9/1/2006, is proof of these RICO Claims made in this 2012 Case against all Defendants and "Others DOE" now including Judge Kovachevich and others as Federal Judges of the Middle District and the Department of Justice Agents now all being informed and involved in these Concert of Actions still ongoing.

15. After many wasteful delays caused by frauds by Lane and his attorney Charles E. Williams, Jr.(Williams) illegally assisting Lane and "Others Doe"(Lane Gang) to continue their criminal acts and frauds, David Landis and the request of McCarthy for Townsend finally filed a Complaint (88-2554[viii]) and served Lane on June 15, 1988, in Seminole County Florida and based on the frauds of Poppers "Gang" per Orfinger, Townsend has never had a proper discovery of facts and thus no day in court free from frauds as a matter of law and each judge known this is not "Due Process".

16. Townsend advised the "Counsels" and "others" including Judges Powell, Stroker, Strickland and the 5th DCA, the Williams filed a Counter Claim[ix] which when "partial" records were produced in 1992, showed Lane/Williams/McCarthy's/Landis/Popper's/Chapin's and "Others" claims were all extrinsic, intrinsic, constructive, actual frauds and frauds at law and concealment of material facts and RICO extortion since 1987, as records proved that:

(1) Townsend did not have to abandon his business, the lines in Section 1. Or the Clients listed in Section 2. Or the New Lines as due to the Fraudulent Inducement by Lane's Gang, proving Townsend could have totally separated from Lane's Gang immediately in 11/1987, with any and all of the Companies and let the clients immediately at their "Free Will" choose sides not require Townsend to wait for seven years or more while the "ineffective counsels" did frauds with judges and "others";

(2) the Bonneau Sunglass Lane presented showed it had expired (5/1987) and based on the new contract obtained as a result of Townsend, Lane was specifically rebuked for his practices and limited in the 10/3/1987 new Contract honoring Townsend as Clay Woods wrote in his faxed 7-10-94 letter. Exhibit (N) in Case 5DCA-98-2111 and 5DCA-98-1866, Briefs of Jurisdiction Further, it was revealed at the time of the Clay Woods, deposition, the only reason Lane was "liked" at Bonneau Sunglass Company was that Lane was paying "kickbacks" to his contact with Bonneau, Tom Slaby. Other Bonneau Executives were not pleased about the "kickbacks" and other practices of Slaby and Lane. But based on the plots of Counsel's and "Others" to conceal their frauds, Townsend was told by Popper and Chapin to "close your business in Florida" so not to chance "competing" with Lane or "Lanes Gang".

(3) Lane and Brennan Sales was paid on new business Townsend had started or gained during the JV and further benefited because Townsend had been kept from doing business;

(4) Lane was paying kickbacks he wrote as "overrides" to Ligori and Ligori's Brother owner of Thrifty Discount, St. Petersburg Florida. As Store Manager of Kmart #3092, South St Petersburg, Townsend learned his part time associate Jerry, also worked for Thrifty and alleged several illegal acts happening at Thrifty. These illegal acts fit into the investigation Townsend was conducting on his Kmart Pharmacist, Dr. Linda Rowe Campbell of shortages and intentionally unlawful leaving the property without securing the Pharmacy Department.

17. Now Townsend is able to believe "counsels" and "judges" knew they were also in violation of the HOBBS ACT.
18. The legal issues to many to include herein but were advised with copies to the Fifth DCA per Identical Petitions 5th DCA Cases against Popper and Chapin included herein by reference raised again as:

Exhibit xxx—Appellant's Notice of Supplemental Authorities of 1/22/1999;
Exhibit xxx---Notice of Supplemental Authorities of 1/21/1999,

19.As Pleadings and the Florida Bar Complaints show Defendants actions are full of all types of frauds and Townsend has raised and argued in the 1/21/1999, Exhibit xxx, Page 20-23, Point 19. Downing v. Vaine 228 So2d 622, 1st DCA, 1969, Townsend could not or is expected to know as a non-attorney a cause has accrued in his favor and "…the event which triggers the running of the statue of limitations is notice to or knowledge by the injured party that a cause of action has accrued in his favor…" and "…Is this what Chapin did for Popper and Now Both For the Other in the way they take turns representing their Defense? Are they then able to still with Judge Powell only be the ones to hold the knowledge of the facts and avoid dragging out answering the client?…PLEASE MAKE APPELLEE(S) COMMUNICATE IN A DEPOSITION…Appellant claims Chapin and his wife through her political position as Chairwoman of the Orlando County Commission during the years of this litigation presents a prejudice against this Appellant being heard in Orlando. Appellant can produce witnesses which will also concur the bias affected them." Federal Judges Kovachevich and in the Motion for her Disqualification and Rehearing sent to Chief Judge Conway but intercepted and dismissed by Judge Kovachevich show Federal Judge Gregory Presnell would be one called in this matter.

20.When Townsend then expanded his Future Marketing business outside the State of Florida and not with any lines or clients connected or competing with the JV, Chapin's Gang including Powell used frauds (and a false bank account from Georgia not connected with Townsend) and "others DOE" to require a full records production in 1/1993, for any and all records personal and business even past any restrictive period as specifically dated in the contract as 1988, so specific new Tort Interference with Business Relationships could be done by Chapins/Powell "Gang" and in all courts until the ruling by the 5th DCA in Robinson v. Weiland[vi] , ET AL. Case 5D05-2380 dated 9/1/2006, Opinion by Judge Sawaya with Orfinger and Lawson concurring. This case for the first time is a confirmed ruling of "Law Enforcers" of the errors and conspiracy of the "Chapins/Powell Gang".[x] Case facts show Chapin and Powell conspired in and before 12/1992, in a private Ex-parte hearing where Townsend was left in an outer waiting area with Chapin's Brief case and Case files. Chapin returned and said that the Hearing, Townsend had traveled from Tampa to attend had been canceled and Townsend had to do a full records production and attend another deposition (3rd). Chapin advised until this happened Lane was not to

produce any records nor answer any questions that we were still waiting on him to be answered as Certified in two previous attempts. The Robinson id. Rules shows several Powell errors Townsend alleged to Chapin then were one-sided and suspicious; (1) No full Lane Discovery had been obtained; (2) Lane refused to answer most if not all deposition questions and was not challenged by Chapin or Popper and now it is known Chapin was intentionally avoiding the necessary issues keeping Townsend from understanding the frauds; (3) In 1/1993, as soon as Townsend got his over 10 legal boxes out of the office of Williams, a letter in the form of a Motion detailing the frauds of Chapin, Williams and Lane was given to Judge Powell but rejected with no hearing nor did Powell grant discovery demands showing Chapin's and Poppers obtaining kickbacks or acknowledging the acts were intended as frauds to conceal their Counselors liabilities for their "ineffective counsel"; (4) An Independent Action per 1.540 was filed against Lane which Judge Powell again rejected and misreported facts, ignored frauds and concealed his own conspiracy with Chapin and "Others" in their "Gang" as now time has exposed; (5) Chapin and Powell stayed closely regulating the actions Townsend filed as Townsend v. Lane, Townsend v. Williams, Townsend v. Popper and Townsend v. Chapin. And in collusion with themselves and "Others" shut down each case not allowing hearings to obtain or produce discovery of "Lane's Gang" bank records and Contracts as required per Robinson Id.
(6) Now we know even the records produced by Lane and those gained by the Brennan and Woods Depositions were frauds as Chapin and his Gang had conspired to fake all the right questions verses the real facts Brennan and Woods and Others later freely revealed.

21.The pattern to close down Townsend at every opportunity in Courts, Church or Business is the ongoing Plot since 1987 and easy to connect when one follows: the "Blocking of Discovery"; the money trail and Quid Pro Quo "kickbacks" and that they are all connected as things that will vindicate Townsend being "Legal and Truthful". Also what is known now is confirming the need of the words of John Root of the Florida Bar saying "This is the worse case of abuse I have seen in my over 27 years investigating cases for the Florida Bar, but my boss has told me to close this file and never talk to your again. Good Bye!" And also the threats directly from Florida Bar officer John Boggs and Tim Chinaris stating, "If you get your law degree, within six month we will see you get disbarred". And now with all that has been revealed Judge Kovachevich for her co-participants can't afford to let Townsend even reveal more truths connecting these

criminals and the corruption in our fraudulently self professing honorable Government officials held up to us as the most ethical of the Honorable.

22.McCarthy, Landis, and Popper all ignored Townsend's plea for immediate Subpoena's on Lane to obtain the "true" contracts since 1987, to expose his "Illegal Gang" and how much business Townsend was unlawfully losing and until 1/1989, did not file for Production of Documents or Requests for Admissions thus allowing frauds of Lane, Williams and "others" to totally dominate the case. This continues frauds Lane and Williams and "Others" could never defend in a trial against Townsend with a jury. Also if Townsend did talk to the Bonneau Executives being extremely ethical people regarding the illegal actions of Lane or go to work directly for Bonneau it was very clear to Lane and Williams that Lane and Slaby would loose the contract that Townsend in September 1987 had just helped renegotiate. Thus from their "Superior Knowledge" Counsels knew since 1987, Williams and Lanes Frauds had caused their "Negligent Services" and Counsels began a McCarthy plot to always keep Townsend from Boanneau and the other lines and clients and a Jury. Even on 8/26/1991 at 8:31 p.m. per the process server's affidavit, for Bruce Chapin, Lane was served a Subpoena Duces Tecum to produce JV business records and specifically the Bonneau Sunglass Records. Chapin wrote at that time he calculated the business to be well over $1 Million on that line alone. Chapin then himself after reviewing the documents hid them from Townsend and returned them to Lane's Gang and claimed he was "impeded" by Judge Powell to let Townsend see the records. Said records when partially later reviewed shows the "Lane Gang" criminal conspiracy and "ineffective counsel" since 1987. (Townsend did not learn of the Bonneau/Foster Grant merger of 1993 or the extreme ethics of Bonneau Executives until preparing this 2012 Appeal.)

23. Once Popper had intentionally joined the O'Neill, Chapin, Liebman, Marks, Popper & Cooper P.A. and brought his and McCarthy's and Landis's negligence and Torts with him in 1989, Chapin took the case as First Chair with Popper assisting and began his criminal conspiracy to "impede" Townsend's knowledge of the facts and the law. Since Chapin's wife was being considered for future Democratic Offices, Chapin's retained the collusion with Governor Chiles and Lt. Gov. Buddy MacKay as Linda Chapin was being vetted to be on the ticket with MacKay. Chapin also as a Mediator for the Florida Supreme Court had direct connections with the Court and with Florida Bar Officers John Harkness and John Berry co-

authors of the McKay Commission Report of 1991 and conspired with them to begin what herein is called the McKay Plot detailed later herein as illegal per the U.S. Supreme Court and American Bar Association.

24.On January 10, 1989, a Joint Stipulation was entered in the case between Charles E. Williams, Jr. Esquire and John W. Foster, Esquire of Smith & Schnacke as Williams left the firm. Townsend now believes and alleges Smith & Schnacke became aware of the unethical and illegal practices of Williams and they parted ways when Lane had to produce to Williams, Smith & Schnacke the Contracts and other documents partly shown to Townsend in 1992.

25.At multiple times from after the 1988 filings, McCarthy while in her private practice and after her joining the States Attorney Office and others have been fully informed of the ongoing actions of Defendant's and "others DOE" and since 10/2006 been able to view www.Judgeoneforyourself.com.

26.This 88-2554-CA-03-P case under the lawful care of Judge Muszynski is taken from his jurisdiction by fraudulent advice of Popper per "Counsel's" scheme to Obstruct the Orders of Judge Davis and Judge Muszynski Ordering Lane to produce to Townsend by February 16, 1989, the Contracts of Lines in Section 1. and allow Townsend actual first inspections of the Contracts. The case is transferred to Orange County as Case 89-3299 now known as joint collusion by Popper, Williams and Chapin ET AL and "Others Doe" Townsend now believes and alleges involved in this plot was also McCarthy ET AL, and Landis ET AL and "Others" to protect themselves and their law firms from Townsend considerable financial losses and up to at that time and as proof offers that since their being informed of what the Joint Venture Contracts showed upon being produced to them in 1989 or before, all had committed frauds to Townsend, the lines, the Court of Judge Muszynski and failed to the public to fully expose and prosecute criminal acts of Lane and thus are liable to Townsend for considerable damages not just from money due per the Joint Venture Contract but more money due from telling Townsend "Do not Compete" with what is shown never existed.

27. Two significant facts expose the motives that Lanes Gang and the Counsels knew that Townsend could not know was: The fact that Bonneau and Foster Grant sunglass companies became one company and Lane retained both at the loss to Townsend was a significant motive to conceal all

of "Lane's Gangs" income, frauds, kickbacks and witness tampering as all that business had been offered to Townsend when Bonneau and Foster Grant Executives were notified of the Townsend and Lane separation as of 1/1/88; Also as "Attorneys" without protecting Chapin ET AL each "Counsel" would be exposed they had violated their Attorney Black Law Rules so Chapin could using his wife's powers as Chairwoman of the Orlando County Commission (and as they did with Pat Bean in Hillsborough County or with the Governors, FDLE, Florida Supreme Court, and by Mel Martinez going from replacing Chapin as Chairwoman then to HUD, McCarthy working in the State Attorney's and for the Federal Attorney's at times with Robert O'Neill the current U.S. Attorney Middle District) bribe and control the judges, the Bar members and "Others" even Linda Chapin rewarding the judges casting the vote to build a new courthouse and "others DOE" to "impede" Townsend at all costs as Judge Orfinger and the 5th DCA admitted 9/1/2006 that Powell, with prior 5th DCA Judges and "Others DOE" were involved since 1987, in illegal "Due Process" concealing "Discovery" of Lane's and "Others DOE" criminal acts just as Townsend alleged in all prior Court Papers. These core issues are written in Townsend's MOTION FOR REHEARING to Judge Powell since January 1993, Exhibit xxx and to the 5th DCA since 1999. (Exhibit xxx) The FINAL SUMMARY JUDGEMENT of Powell is an admission of his knowledge that Townsend alleged frauds of "Lanes Gang" but Powell diverts the attention from "Chapin's Gang" which included his actions of prejudice and Quid Pro Quo "kickbacks" (Looking good getting a new courthouse and retention) from his Bosses as Linda Chapin and her "Gang" now as per the 7th Circuit Court of Appeal he had a duty to grant Townsend's Motions for Change of Venue, Discovery and Demand of a Jury Trial to get justice on them all. Public Florida Bar Records even shows Florida Bar Executives and "Law Enforcers" still give Judge Powell exceptions to ethical conduct even after exposure of the Judge Orfinger, 2006 Ruling showing Powell's and his "Gangs" intentional conspiracy.

28. Further, as a point Townsend affirms and believes going to showing Defendants corrupt motives as is the evidence in **THE FLORIDA BAR, v. Ellis S. RUBIN** 549 So.2d 1000(Fla. 1989) showing proof of a RICO CASE this shows Florida Bar Officers Harkness and Berry with approval of the Florida Supreme Court ordering attorney Rubin to allow the client to do a known false "narrative" in court. This is to do fraud to the jury. Defendants are approving fraud in the court to an unsuspecting jury which is condoned by the A.B.A and U.S. Supreme Court. The Public Citizens of which a jury

is acquired are per the Constitutions of these United States, State of Florida and FBCCP, BLACK LAW RULES and Bar Rules are not to suspect that any member of the Judiciary is per their Oath to knowingly allow fraud to be told in any "pure" court or our Church. More now is proved in this "Concert of Conspired Actions" by these Defendants and "Others DOE" which in this case has damaged Townsend and these Plaintiff's for which he speaks in that only the fraudulent lies of these Defendants is told by their frauds in FBCCP Church Meetings and Records, CPCS School Records, Dr. Lon Lynn's Doctors Records, and Lawyer Conspired Court Presentations when Townsend is prohibited by FBCCP/ Alias Trustees "masked" also as Sheriff Deputies and or with their Superior Law Enforcers and or ordered with Lawyers Gibbs, Grant and Dickinson and Gibbons, and intentional "Ineffective services of Scruggs and Gray" and "Others DOE" from even as the "Truthfully Elected" Supreme Court of the Church Leader entering his own Church/School, seeing the truthful records, and interviewing his own kids and fellow members subjected to extortion and batteries as a result of Townsend being prohibited as Popper said since March of 1987, stop talking to your business clients as this is going to be viewed as "witness tampering" and "tort interference with contracts" by Lane.

29. Additionally the positions from: the JQC, Kennerly, Docket File 05410 Letter 12/19/2005: and Bush's Counsels letters; The FDLE; The FBI; THE DOJ; and "Others" including these Federal Judges then seem to show the conspiracy to conceal truthful evidence to citizens extends upwards to the highest levels in our "Government" Systems of alleged Justice and "innocent until proven guilty by due process" as Townsend has not been allowed assembly with his children, Church Family, or his property in the form of Business Records and Church Business Records since McCarthy did "ineffective counsel" in 11/1987.

30. In 1992 even till now if what Judge Orfinger said in 2006, "Discovery" is required as Popper ET AL should have done per the Law, the Lane/Sabal records if produced in 1/1988 or earlier as required would show Townsend should never have missed any business opportunities as Lane had no rights to any contacts he made in or about 8/7/1987 and proving RICO and Anti Trust. Popper's and Chapin's the Business Loss Rule was a fraud as they caused Townsend to lose the Business as they intentionally assisted Lane's Gangs Frauds for 7 years and longer as we still miss major documents.

31. This same delay of the Beck v. Townsend (01-15813) and Karen Harrod Townsend v. Townsend (01-15814) and (02-4974) and Townsend v. Beck (02-03812) Townsend v. Scruggs (05-0911) especially required Discovery as Scruggs since July 2000, is now proved doing Fraudulent Concealment, actual and conspired frauds as Townsend's Counsel as he wrote what was thought to be sufficient legal pleadings to this 11th Circuit Court of Appeals and the United States Supreme Court in these earlier related cases verses what records are partially produced in 2006 became all the more reason for the RICO case now before this court as we have connected and admitted proof of these same patterns of Concert of Actions started in 1987 continue in the State Courts and that a "prejudice" and "construed fraud on the courts" done by RICO practices in an ANTI-TRUST Manner has been done as even after Gray is disbarred and Townsend uses the Malicious Prosecution Words written by Judge Crenshaw, no judge or "Government Person" in Florida yet affirms these Complaints are "Short and Plain" or "They are not detailed enough" even confirmed by signed affidavits and confessions of even the Florida Chief Judge thus proving the "Fraud, Collusion and Arbitrariness" as a F.S.§617.834, Respondent must prove and per Florida Constitution Article I. Section 3., be granted a Jury Trial.

32. The PCA filed April 20, 1999, by the 5th DCA was knowingly, intentionally and directly used for FRAUD in conspiracy by "Government Persons" Townsend alleges at the highest levels of the Bushs/Chapins/Conner/Martinez/ Supreme Court and Bar Officers "Gangs" and it would not be in their best "Political Interest" to let Citizens know how up to that time these persons had been involved in "Fixing" cases to conceal each others betrayal of citizens. As a Gang they collectively and independently have motive and ability with Lanes "Gangs" Concert of Actions to continue to "impede" Townsend as at the same time in FBCCP, "Gibbs/Grant Gang", "Law Enforcers" and "Others" knew FBCCP Officer and Honorable Townsend was demanding: (1) Show me the money trail based on the Tax evasion plot by the "Clergy" and the "Sect" since Nasworthy admitted the By-Laws and illegal Scheme since 10/1994; (2) "Where or who got the missing over $43,000 from the Pastors Salary fund" shown missing between October –December 1998 and where did that money come from; (3) "Stop lying and producing false FBCCP business reports since 1994 and "impeding" inspection of all FBCCP/CPCS Business Records" (4) "Stop the building Schemes Fraud and misusing the Eminent Domain Funds illegally obtained to buy the 18105 Gunn Highway property

that will not get permitted for the CPCS!" The Grant e-mails (Exhibit xx) are submitted herein as proof as how Grant advised "Others" as the Registered Agent and Attorney for the FBCCP/CPCS how to view Townsend as needing to be "Baker Acted" for making claims the "Clergy" were in violation of the law and that the Counsel's were "ineffective" and conspiring with "Poppers and Chapins Others" to destroy the truths Townsend told since 1987 about his business and legal rights and until Townsend finding the Robinson ruling in 2011, Townsend as a non-lawyer had no "written" confirmation of Townsend's Claims of the "Government Persons" conspiracy and frauds of Chief Judge Powell and his Judges and "Lane's Others".

33. Further it should be stated that Governor Chiles had a personal motive to restrain Townsend and anything that legally came out of FBCCP as Townsend's Father, A.C. Townsend as a Deacon at FBCCP, since the 1970's had been a thorn in the side of Chiles over the School Bussing issues.

34. In 1991, Townsend in a lengthy consultation fully informed and answered all questions of David Gibbs, (Gibbs) of the CLA of the Lane ET AL issues. Even after the termination of the law firm of O'Neill, Chapin, Liebman, Marks, Popper & Cooper, P.A., Townsend sought and received counsel from Gibbs. Townsend believed the reports of Gibbs until in 1999, Gibbs refused to require the FBCCP By-Laws process to be followed and Gibbs with his CLA Attorney Drew Gardner specifically "impeded" Townsend's and other members demands of records production from the "Sect" and demands of members to "mediate" a meeting between Townsend and the "Sect" and or between Townsend and the CPCS School Steering Committee "impeding" Townsend's assembly with his children at the FBCCP/CPCS Property or in off property areas at Sports and School Graduation Events. Based on the collusion of Deputies Jeffers, Howlett, Corbin and Smoak and their Superior Officers and co-participants including the now former wife Karen Harrod Townsend to conceal her "attempted murder", "batteries", "abuse", "illegal drug activity" and "Tax evasion", Townsend since 9/8/1999, without "Due Process" was "impeded" at the "Government Persons" will from his children so "Government Persons" and "Others Doe" could conceal their criminal acts.

35. Additionally, besides as Townsend has connected that direct commands were coming down from Governor Chiles, Supreme Court Judges, A.G. Butterworth, FDLE, Florida Bar Officers Harkness and Berry

and Senator Grant, Townsend alleges that Pinellas County Deputy Jeffers had his own intentional frauds ongoing and opportunistically was receiving intentional prejudice as a deputy and as a person friend of the HCSO Sheriffs Department per a August 26, 1998, letter not discovered until 2007, attached and for substance included herein as Exhibit xxx.

36. This August 26, 1998, letter actions are in total contrast to the actions of Defendants and "others DOE" since the Townsend Children were abducted from their safe father and home on October 20, 1999, in collusion with the same Deputies that Judge Merryday convicted who concealed and fabricated evidence in the Aisenberg Baby Kidnapping also of November 1999. Judge Merryday after review of the case evidence it is alleged concealed proof or overlooks key evidence of the pattern of other's inside HCSO and the State Attorney's Office who aided and abetted production of known fraudulent evidence in both Townsend and Aisenberg Cases. It is also not coincidence that Barry Cohen represented the Aisenbergs yet when Townsend sought the representation of Cohen, their firm declined and very carefully wrote a letter they refused representation. It was not know at the time Former Sheriff Everett Rice after retiring from the Pinellas Sheriffs Department supervising Captain Tim Jeffers, was a lawyer with Barry Cohen and this causes the conflict of interest and also however gave suspicions to non-lawyers not knowing this fact as to why a skilled attorney like Cohen would not touch Townsend's case. This gives all new meaning to the words by Judge Crenshaw, herself married to a HCSO Executive Officer, on 9/7/2006, at Townsend rejection of her bribe, "all things are related".

37. Townsend's raised allegations and more could be told and more can be discovered were affirmed by Florida Supreme Court Judge Canady in 2011 recusing the 13th Circuit, 2DCA, 5DCA, and The Florida Supreme Court thus requiring the timely re-filing of this case in the Federal Court Tampa Middle District. These admissions by Florida Supreme Court Judge Canady affirm Townsend has yet received an "Honest Day in a Court".

38. After consultations with many attorneys and "others" in 1993, suspecting frauds of Chapin, Popper, Williams, McCarthy and Lane on the Court of Judge Powell, Townsend as a Pro Se filed Motions for Rehearing to Judge Powell and then 1.540 Motions and a new action(s) as Townsend v.

Lane, Townsend v. Williams, Townsend v. Chapin, Townsend v. Popper and Florida Bar Complaints.

39. Townsend advised many attorneys around the state regarding actions of Chapin with Powell and received interest and advise up until the fact that they were told it was Chapin's leading the way who had conspired with Judge Powell to shut down Townsend in his business practices and in discovery and in having a jury trial.

40. Due to the restraints of the length of this Brief, not all frauds of "Counsels" can be told herein and thus a motive by "Government Persons" for their extortion to threaten Townsend as proved by the "Counsels" letters and to never let Townsend speak to his Religious Society members, a Grand Jury or a Civil or Criminal Jury is proved as their Malicious Prosecution Mens Rea Actions.

41.In 1994, Townsend appeared on WTVT Channel 13, Tampa in their TOWN HALL MEETINGS and asked the panel of Republican Governor Candidates as What do you do when you find out the Florida Bar is lying to you. Candidates Jeb Bush and Ken Conner took the lead to answer the question that they would not let anything like that happen. In the studio after the taping Townsend had the opportunity to give more details to the candidates and fully informed Jeb Bush. Townsend then in follow up continued advising Bush and Conner even meeting with Conner in his Tallahassee office and giving him a copy of papers Townsend filed with the courts for him to read and comment which he did. Some of those over 25 attorneys and Others also advised are Mel Martinez, Toni Jennings, Jim Norman and Gregory Presnell now a Federal Judge Orlando. Townsend from the Republicans received many open ears listening to what the Chapin Democrats were doing and gave their support and advice.

42.Further, when being fully informed by Townsend of the Chapin ET AL Concert of Action in the WTVT Television Studios in Tampa, Jeb Bush then rather than as he directly promised to provide "Honest Services" instead joined the Plot to protect and conceal Linda Chapin, for his own self dealing benefit of himself and the Republican Party with Toni Jennings, Mel Martinez , Charlie Crist and brother "George W" stopping the Feds.

43. Jeb Bush had his aid Reginald J. Brown Assistant General Counsel write a letter June 11, 1999, that "I am very sorry that you have apparently

been the victim of wrongful conduct …Governor Bush cannot, of course, intervene or comment on your pending case. He would, however, like you to know that he is committed to reigning in lawyers who abuse and undermine our system of justice.

Jeb Bush sure though did get directly involved in the case of Terry Schiavo which involved Ken Connor, David Gibbs III, the Pinellas Sheriffs Department, Mike Schiavo a co-worker with Tim Jeffers at the Pinellas County Jail. Their position that a State should not overrule the Church and try to separate a family was a total opposite to what Bush, Conner, Gibbs III, Grant and Jeffers were intentionally doing to the Townsend family and Church since 10/1994, as they all knew all the criminal details.

43.In July, 2000, Townsend while continuing presenting these same "Lane Gang" and "FBCCP GANG/SECT" related issues through the courts and theses "Defendants" and "others" all the way to the United States Supreme Court retained the services of Charles H. Scruggs III (Scruggs) and believed until 9/30/2003, Scruggs per his now known "false pretenses" was providing "Full Honest Services" as an expert of the law as an attorney and as a former Hillsborough Circuit Court Judge with our same Religious Society Contract beliefs.

Even in February 2003, Townsend agreed to hiring Heather Gray(Gray) to allegedly Honestly assist Scruggs as they presented her as a more skilled attorney at the appellate courts. Neither disclosed their clients lists with the conflicts of interest with Defendants herein nor did they disclose their "Hostile" Beliefs as Scruggs would later write in Exhibit xxx. Evidence now revealed shows Scruggs was an unlawful "Falsehood" from the start and has received Quid Pro Quo rewards from his now co-participant defendants who as his superior "Government Officers" grant him illegal immunity.

45. The multiple threatening and fraudulent John Grant e-mails even after being fully advised of Townsend's positions and included herein best show the frauds and defamation of Townsend's reputation, alleged mental state (Need of Baker Acted) or now confirmed truthful Legal positions and the collusion of Lane Gang Defendants as "Government Persons" with their co-participants practicing deceptions on non-lawyers and the Tax Payers and Religious Society Members of FBCCP/CPCS and Townsend's own children and family since Grant was first informed of "Sectarian" frauds by CPCS Principal John Berry and Townsend since 1994 upon the disclosure of

Nasworthy admitting violations of members votes in the FBCCP October 1994, Business Meeting.

46. The "ineffective Counsel" by Grant and Gibbs to the FBCCP and Tax Payers, just to oppose Townsend "Truths" at all costs and their "impeding" FBCCP Rights and our Civil Rights in collusion with "Law Enforcers" (Sheriffs and their Agents, Florida Bar Members, State Attorney's Officers working with McCarthy as Scruggs, Pam Bondi, Heather Gray, Peggy Quince and "others", FDLE, Governors, A.G.'s, DOJ, FBI, Judges) concealed per the directives of Jeb Bush and his Brother, with Judge Kovachevich continues still in 2012, assists the ex-wife and "others" to abduct since 1999, Townsend from his kids and his FBCCP members.

47. On 10/31/2001, by the frauds of the Grant/Gibbs Gang the "greedy" Ron Beck and Karen Harrod Townsend for themselves and "others DOE" filed fraudulent affidavits in cases 01-15813 and 01-15814, using the now proved "Fraudulent" legal counsel of Grant, Gibbs, McCarthy through Popper and Chapin with the Chief Judge Powell Judges, Bar Members, Governors, and other "Government Persons" and their "willful" Other Co-Participants seeking permanent injunctions against Townsend as a fraud to conceal their and their co-participants criminal conspiracy.

48. In a hearing on November 15, 2001, before Judge Raul Palomino, Scruggs claimed he honorably represented Townsend faced with Federal Felony charges ("Repeat Violence, Domestic Violence, Stalking, Dangerous with Guns, Abuser of Wife and Children, Molester of his Children, Infidel, Liar", an insane person based on his crazy legal arguments of the corruption of his attorneys and judges "who should be Baker Acted[xi]") from FBCCP "Pastor" Ron Beck (Case 01-15813) and "others Doe" kept out of Townsend's site in an unknown waiting room only naming Deputy Joe Howlett as a FBCCP Trustee concealing his own criminal frauds (Howlett admitted, Beck tried to call as witnesses and including Townsend's wife (Case 15-15814) at said time Karen Harrod Townsend who testified falsely in affidavits she recanted to "judge Holder" in 12/2005 in case xxxxxxx that she had lied and told of admitted frauds and conspiracy of her with her co-participants. The Affidavits of Karen Harrod Townsend represent the same collusion and frauds of Grants E-Mails written by Grant showing his personal involvement to assist Karen Harrod Townsend's frauds with Beck, Scruggs and "Others" in the frauds knowingly done in the Palomino Court intentionally by conspiracy and frauds of Palomino, as Townsend tried to

defend himself and the FBCCP/CPCS and Religious Society Members being kept naïve by "Government Persons" in collusion with the "Sect" and Others. Exhibit xxxx is the Hand written letter of Scruggs sent to Townsend and revealing just how much "Hate" Scruggs had to Townsend and his clients through with Townsend speaks. Exhibit xxxx is the Testimony of Scruggs on February xx, 2006, to Judge Stoddard as Scruggs admits "Ineffective Services" as that he was "afraid" of Deputy Howlett and "others" who used Howlett as their key witness to be called in the 01-15813, trial before Judge Palomino. Scruggs did not as the "counsel" for the "Hand that feeds him" "Government Persons" (as the DCF, State Attorneys Office, Hillsborough Board of County Commissioners, Hillsborough County Administrator Pat Bean and "Others DOE" not yet revealed in Scruggs taking Quid Pro Quo Bribes to do "Ineffective Counsel") bite his Quid Pro Quo co-participants as if Howlett was on the stand and Scruggs and Palomino doing "Honest Services" the frauds of the Howlett Gang would be exposed to naïve non-lawyers. Judge Crenshaw and "other" judges now defendants are still in collusion obstructed Townsend to use the Pellegrini Rule since this Rule in a Malicious Prosecution Case was first discovered by Townsend in 2003.

49. In continuation of Defendants Concert of Action, in April 2002, Karen Harrod Townsend (Harrods) filed 02-4974, a Divorce Action and Townsend per the advice of Scruggs and "others" timely replied by filing Townsend v. Beck ET AL (02-03812) with the Courts to enjoin the cases and to get "discovery" to prove the intentional collusion by Harrods/Becks Gang. Scruggs intentionally gave fraudulent advise and conspired to destroy Townsend and his children's relationship and rights.

50. Scruggs continued to claim he was giving "Honorable Services and Legal Advice" until on 9/30/2003, when he stated "It is against my personal convictions to make a church look bad" and "I never planned to bring the church matters into the divorce case" and "Some day you will get your kids back" all the while Scruggs was now known doing intentional frauds to Townsend and "Others" just to not "bite the hands feeding him" as an agent for "Government Persons" doing frauds to Townsend and these Appellants for whom Townsend speaks. Thus his motive for intentionally ignoring the demand letter faxed to Scruggs on 11/12/2001, for Scruggs to do Subpoena's to "Get the FBCCP Records to show the frauds of Beck's Gang" shows Scruggs knew the collusion of the Howlett's Gang. Scruggs has repeatedly been rewarded Quid Pro Quo for his "ineffective" services to betray the trust

of Townsend ET AL despite reports of several cases where Scruggs was in lawsuits[xii] clearly detailing what an "Effective Counsel" should do.

51. Judges Palomino, Arnold, Timmerman, Sierra, Gomez, Stoddard, Barbas, Holder, Crenshaw, Chief Judge Menendez, Cook and "Others" have knowingly aided and abetted criminal acts of Scruggs and Gray in frauds for services not rendered and continuing Torts against Townsend and those for whom he speaks Townsend asserts acting in collusion with the directives they are receiving from their Superior Officers. Further, after filing Florida Bar Complaints and Townsend v. Scruggs multiple other citizens have come forward with their proofs of the illegal patterns of Scruggs Gang.

52. While Gray is disbarred for the same facts ignored by Scruggs, Scruggs is Quid Pro Quo continued to be rewarded by Governor Charlie Crist as Regional Counsel and by Judge Menendez and "Others" as Tampa Mayor, Pam Iorio as City of Tampa Ethics Commission Member since 2008 so he can conceal his co-participants violations of clients, citizens and the law.

53. Townsend timely filed Townsend v. Scruggs 05-0911 and to judges Palomino, Timmerman, Gomez and Judge Stoddard he exposed and admitted his intentional "Ineffective Counsel" and then writes the letter February 16, 2007 to threaten his former client included and attached herein as Exhibit xxx because Townsend refuses to take their bribes and not follow the laws that entitles all Citizens to know their truth and rule justice in a jury trial. Even Judge Crenshaw called out Scruggs as violating the Trust of Townsend but she conspired with Denny and Rolfes in 2006, to do the same frauds to the Church Members.

54.Townsend timely filed Townsend v. Karen Harrod Townsend, (05-9605) as a reply case from 01-15814, Malicious Prosecution case, Breach of Contract of our FBCCP Membership Contract based on her separated by Scruggs violations and based on her false affidavits intentionally frauds a Judge Powell had ruled, and as a case to protect Townsend and his children from additional abuse by Karen Harrod and her maternal family and "Others" and by this case tried to show her "attempted murder", batteries, abuses, Drug Abuses, demented mental state, Tax Frauds and conspiracy to destroy Townsend's evidence so she could assist: her FBCCP employers as "Sect Members"; and her brothers tax frauds; mothers drug abuses; and fathers violent abuse and conceal their crimes; and even destroy case files

being prepared as Townsend wrote the Appeals Briefs in Lane, Williams, Popper and Chapin. Karen Harrod Townsend could not be trusted to be legal and after meeting with Scruggs in July 2000, a Certified Mailed letter was sent to Dr. Lon Lynn advising him of her demented state. Scruggs prohibited this material fact from being disclosed in courts and also prevented the two doctors reports that J.D.T. had been abused and bullied at Citrus Park Christian School and FBCCP by these "Sect" Defendants and "Others" as Government Officers who still lie to the kids and tell lies about this father since 1987.

55. Townsend timely filed Townsend ET AL v. Beck ET AL Federal Case 8:06-cv-02050-T-23TGW.
56. Townsend timely filed Townsend ET AL v. Gray ET AL, 06-6005.
57. Townsend timely now filed this Townsend v. Gray ET AL Federal Case 8:12-CV-1198-T-17-EAK-EAJ.
58. And this Appeal 12-13892-AA and Initial Brief are timely filed.

And Townsend still seeks Court Orders for Discovery of Lane, Sabal, Sealane Records, FBCCP/CPCS Records, J.D.T. and J.G.T. Medical Records from Dr. Lon Lynn, and records from each Defendant and "others DOE" where kickbacks, Quid Pro Quo acts, records relating to conspiracy acts and Monies due to reimburse Appellant Plaintiffs can be tabulated.

The Statue of Limitations cannot expire in this case due to the underlying civil violations and criminal acts still ongoing since 1987, in the collusion of "Government Persons" as per the 7th Court of Appeals and per this courts ruling of "ineffective counsels".

The United States Supreme Court has written that at any time they will accept a Motion for a Writ of Mandamus in this case.

ADDITIONAL FACTS!

The question is when "Government Persons" are corrupt how can a "Citizen" report a 9-11 Crime or Crimes since 1987 and just continue to receive threats for reporting crimes to the point of having ones kids taken illegally from them as extortion to not report the crimes?

Townsend, raised since 1969 in the First Baptist Church of Citrus Park (FBCCP) rejoined in August 1993, and was after being Nominated by Dr. Harold Warner, Pastor and others, immediately and unanimously elected as an Officer per the By-Laws of 1993, as Long Range Planning Committee

Chairman (LRPC) and in 1994, Awana Commander and Nominations Committee Member and at times various other positions to carry out the "Mission Quest" as the Church and their ministry as Citrus Park Christian School (CPCS) was faced with Eminent Domain Proceedings verses Hillsborough County Florida and overgrowth at the current site. With Dr. Warner wanting to retire, Townsend "As the Designated Younger Man" was elected for these other Appellants since about August 1993, and has spoke for the membership when shortly after the arrival of the new pastor Ron Beck a "Sect" led by Beck and Tim Jeffers and "Others" developed: intentionally violating the By-Laws; and illegally self-dealing members designated funds; intentionally producing false records in FBCCP Business Meetings; Using the "Non For Profit" for Tax evasion; using Eminent Domain funds a.k.a. Tax Payers Funds for "Unjust self-dealing Enrichment" by fraud to the Members and as Taxpayers of their own property; using FBCCP funds to support Political Candidates; promoting a fraud to the members regarding the purchase and zoning of the 18105 Gunn Highway 40 acres.

The "Criminal Enterprise" still continues through Jeffers and "others" even after exposure of partial records, the testimony of accountants, confessions of "sect" members and admissions of multiple "law enforcers" and Florida Bar Members. By dismissal Judge Elizabeth Kovachevich is allowing more deprivations to Appellants and assisting in the continuing of criminal acts by Defendants and "others" assisting concealing documents Townsend and the membership have a right to full exposure.

For the membership Townsend as the Nominations Committee Supreme Court Member of Ethics per the By-Laws sought "Honest Services" of "law enforcers" (Jeffers, Howlett, Corbin, Smoak) and "legal Counselors" (Gibbs/CLA ET AL, Grant ET AL, Gaylord ET AL., Scruggs ET AL, Dickinson & Gibbons ET AL as Denny and Rolfes and Gray ET AL and "Others") and Judges, and as directed in the underlying case Townsend ET AL v. Beck ET AL by this Eleventh Circuit Courts ruling of "Ineffective Counsel" comes again now having the "Legal Proofs" of confessions of the wrongdoing and intentional torts of the "Ineffective Counsel(s)" and Judges[xiii] with their intentional "Co-Participants" in this same ongoing timely case "For The People" unlawfully "invaded" and "impeded" seeking: Writs; Restitution of our Civil Rights; and Restitution for our intentionally caused deprivations caused by Defendants as our "Lawyers" "Outrageous" intentional frauds and now proved intentional "fraud, collusion and arbitrariness" being done and is still ongoing with their co-participants even

including their “Outrageous” “Superior” Officers and “alias” “honorable under color of law” “law enforcers”.

Appellants come again legally via Townsend our F.S.§617.0834, Elected Nominations Committee a.k.a. Religious Society Supreme Court Member per our By-Laws of 1993, Representative, timely filing this Federal Concert of Actions complaint based on the continued intentional “operational” conspiracy of Townsend’s and FBCCP’s (using Townsend’s funds and property) paid Attorneys acting in Malum Prohibitum Malum In Se Mens Rea collusion since and before April, 1988 to in “Singularity” “Damage their Client(s)” and continuing ongoing malfeasance still at later times with those “masked” as “Lawyers” and “Law Enforcers” and “Others” even their co-participants “masked” as “Clerical Elite’s as deputies, pastors and others doing “hate crimes” while claiming to be FBCCP/CPCS Members” who continue “intentional fraudulent services” violating the By-Laws conspiring to fail to provide “Honest Services” just so Townsend would always look like the “liar” Popper needed Townsend to be so to remove liability from Poppers malfeasance and collusion with Lane and Williams when Popper learned of the substantial contract financial losses and defamation his delays compounded with the delays of Attorney Patricia Ann McCarthy (McCarthy), (later joining the State Attorney’s Office) caused Townsend and his business Future Marketing when Townsend in November 1987, caught Lane in a Tampa (Hillsborough County Florida[xiv]) hotel using drugs and learning Lane was diverting Joint Venture monies for his habits. Neither McCarthy nor Popper wanted it exposed their delayed legal advice to Townsend due to the frauds of tolerating illegal tactical delays of Charles E. Williams Jr. intentionally lying to protect Lane his friend since Junior High School and client Charles E. Lane Jr. concealing company funds to fund their later admitted drug habits.

With Poppers knowledge of their negligence of the RICO acts of Lane and “others DOE” they conspired the plan to protect themselves at the expense of Townsend leading to their RICO and Anti-Trust and Kickbacks and Extortion torts ongoing still to this day proving a little lie Defendants still try to advance always gets bigger.

With Popper being at O’Neill, Chapin ET AL the conspiracy became protect the O’Neill, Chapin firm but more so the reputation of Linda Chapin as the first Countywide Chairwoman of the Orlando County Commission being vetted for Lt. Governor and other offices in the Democratic Party.

Again with releasing of the Lanes records the kickbacks of the continuing Popper-Chapin(s)-Governors-Florida Bar Officers-State Attorneys- FDLE-Gibbs-HCSO-Bean-Jeffers-Scruggs-Gray-“Others” ET

AL's Malum In Se Concert of Actions (McKay Plot continuing what Popper began to never let Townsend have an honest day in any court or look truthful or lawful), continued by Judge Powell refusing to admit the Chapin torts to Townsend and Powell knowing his superiors would confirm him ruling Townsend did not "specify the fraud and explain why the fraud, if it exists, would entitle the movant to have the judgement set aside"…(Because appellant did not specifically plead the two grounds that would have formed a basis for relied-fraud and coercion—the trial court correctly dismissed the petition for failure to state a cause of action."), rev. denied, 640 So2d 1107 (Fla. 1994). Affirmed. By Peterson, C.J., and Goshorn and Harris, JJ., concur. Yet this position was verbally admitted as "This is the worse case of abuse I have ever seen in my over 27 years investigating cases for the Florida Bar, but my boss told me to close this file (Florida Bar Complaint 93-690, 93-691, 93-692) and never talk to you again, Good Bye!" Townsend alleges and believes this Thursday evening call came from John Root Jr. and was confirmed only in written form Townsend could show from a Florida Bar Report or Court until Townsend in 2011 discovered the ruling of 5th DCA Judges Orfinger, 9/1/2006, as just like the Powell trying to not disclose evidence to affirm the claims of Townsend, Judge Crenshaw in the same McKay Plot on September 7, 2006, tried to bribe Townsend "Shut up I am trying to get you a lot of money…and you can go after all the others later." After for Honor and the fact that it is illegal since 1987 refusing the bribes of Lane, Williams, Popper and Chapin, Judge Crenshaw and Denny ET AL had the nerve to offer another bribe to sellout his Honor, his Naïve family and Naïve Church Members that this continuing Concert of Actions should expose them and put them all in jail. Judge Holder had just ruled Res judicata so thinking any judge would allow a new state case in the 13 Circuit was naïve!

In the court of Judge Stroker on October 2, 1995, the alleged legal position Chapin and Popper argues as "Business Loss Rule" is denied by Judge Stroker who still in prejudice and fraud and as he is ordered continues the McKay/Chapin Plot to never let Townsend look honorable or truthful. Counselors had said since 1987, Business Loss Rule applied based on their Legal Opinion and thus Townsend never suffered Business Loss as a matter of law and thus no damages, so they had no case against Lane or fraud on Williams. Now the facts show per Judge Orfinger, this Judge was a fraud.

After this October 2, 1995, Chapin and Popper walk Townsend to a local coffee shop and offer Townsend a bribe saying we know we did you wrong but you just heard the judge and you will never prove it. Here is our deal, you drop the case and we will pay you a finders fee for helping

someone we know find restaurant locations. Then a threat of you better take this offer or else. It appears now that they knew justice was never to be done.

Townsend ET AL victims come with the following counts: I. Breach of Contract Against FBCCP Sectarian Members in violations of the By-Laws; II. Breach of Contract Against Lane a.k.a. Sabal Marketing Inc. in violations of the August 7, 1987 "Brokerage Agreement"; III. Claim for Fraudulent Inducement Against Lane a.k.a. Sabal Marketing Inc.; IV. Claim for Fraud by Fraudulent Inducement Against all Defendants; V. Wrongful Invasion of Privacy against defendants as stated; VI. Claim for Interference with an Advantageous Business Relationship(s) against all Defendants; VII Wrongful Invasion of Privacy of FBCCP "Non Sect" against Defendants; VIII Unjust Enrichment against all Defendants; XI Claim for Accountings and Discovery of Records regarding certain monies due and owing Plaintiffs Taken by larceny and fraud against all Defendants; X Racketeering against all Defendants; XI ANTI- Trust XII Cause for inadequate training, Supervision and Discipline Per Respondent Superior and Vicarious Liability And Class Action and in the timely filed Amended Complaint reduced to 50 pages in order to comply with the prejudiced restrictions of the Court to limit Plaintiffs exposing Defendants detailed "outrageous" violations of the laws and contracts as Count I. Reinstating All Claims of the Amended June 22, 1989 Complaint 89-3299[xv], As Written By Popper P.A.; Count II. Malicious Prosecution; Count III. Petition For Writ Of Mandamus—To Compel recognition of petitioner's election to the FBCCP governing board; Count IV. Unjust Enrichment; Count V. Claim for Accountings and Discovery of Records Regarding Certain Monies Due and Owing Plaintiffs Taken by Larceny and Fraud; Count VI. Racketeering; Count VII. Anti-Trust; Additionally Plaintiffs seek Writs of Mandamus; Habeas Corpus; Prohibition; Restitution; and Arrest Warrants for Defendants and Certification for Class Action.

27.Previously, in 2008 in the timely, underlying related case this Honorable 11th Cir. Court ruled "Ineffective Counsel(s)"[xvi] a.k.a. "alias" "Government Persons" and sited **Salinas v. U.S.**[xvii] to these Plaintiffs, as Townsend and those of the Religious Society Congregation of FBCCP and CPCS for which Townsend was elected to speak in or about 1994, being informed unanimously elected per our By-laws and still acts likewise per F.S.§617.0834[xviii] who sought the same relief from "non-member government persons via Deputy Jeffers and Deputy Howletts" ongoing invasion of privacy, defamation, frauds, intentional torts and intentional

emotion distress as Townsend was concurrently enduring in **Townsend v. Lane**, **and Townsend v. "Government Persons" Popper, Williams, Chapin ET AL** being assisted by non-member self dealing government "law enforcers" as Deputies (Jeffers, Howlett, Smoak, Corbin) and others and with their Co-Conspirators and "Alias Superior Officers", Gibbs, CLA, Grant, Harkness, Berry, Gardner, Bean, Cary Gaylord, Scruggs, Judges, Attorneys Generals, State Attorneys, U.S. Attorneys, Governors, DOJ Members, Senators, HUD Members, Presidents and "others DOE", from this Court in the underlying case Townsend ET AL v. Beck ET AL. With this Honorable Court found and ruled "Ineffective" Services by Counsel(s) Plaintiffs entered this finding into their timely State Court pending case (06-6005) against one of the "ineffective counsels" as Gray (now disbarred for the same frauds and abandonment "failure of services" actions as done to her clients Townsend Et Al) who had been retained and paid per her agreed services of these underlying Intentional Concert of Actions claims never yet performed by her or the other "Law Enforcers" or "Ineffective Counsels" and "Others DOE".

3. Just discovered in 2011 was the ruling of Judge Orfinger and the 5th DCA Judges ruling as Townsend has alleged but could not get a "law enforcer" to affirm by verified testimony to this non-lawyer that the ruling by Judge Rom Powell, Judge Strickland, Judge Stroker, Adams, Perry and Judges in the other cases that the conspiracy by these "alias" judges was done as directed by Chapin and his co-participants to damage and make his client Townsend appear as the "liar" in the Townsend v. Lane Case so the firms of O'Neill Chapin ET. AL, could not be held liable for the negligence of their new partner David H. Popper P.A. or while at Austin, Lawrence and Landis and concealing Focht & McCarthy.

Now before this Court is as Townsend alleged is the verified proof by their own acts and admissions by Popper even back to starting in 1988, by and of the same "McKay Plot" via "Popper/Gibbs/Jeffers Government Persons" RICO and Anti-Trust Concert of the Intentionally Conspired Actions since the 1988- now unlawful scheme by the "Intentionally Ineffective Counsels" a.k.a. "Law Enforcers" as Popper ET AL who: Demanded, Conspired and Ordered said "Ineffective Counsel"; Provided Quid Pro Quo rewards for said "Ineffective Services" of and by themselves; and when not to expose themselves who instructed and then privately reprimanded these lawyers and or disbarred a lawyer for the "Ineffective Services"; and then in collusion dismiss cases of these Plaintiffs as victims of the Criminal Acts and "Concert of Actions Ordered Ineffective Services" a.k.a. Illegal and Malpractice of Government Persons intentionally violating

Constitutional Rights per the HOBBS ACT and the Civil Rights Acts and United States and Florida and FBCCP Constitutions.

Now before this Court, these Plaintiffs to the lower Courts (13th Circuit, Hillsborough County, Florida; 2nd DCA; 5th DCA; Florida Supreme Court; Tampa Middle District) alleged and proved the "Intentionally Ineffective Counsel Gray and "All" as McCarthy/Popper/Williams began and willfully joined by Chapin(s) ET AL/Gibbs/MacKay/McKay Plot for Political Quid Pro Quo self-dealing "Concert of Actions" as the "Ineffective Services of Counsel(s)" is a: RICO; ANTI-TRUST; HOBBS ACT; BLACK LAW RULES; F.R.A.P.; VIOLATIONS, MALICIOUS PROSECUTION, ABUSE OF PROCESS AND POWER "Fraudulently Under Color of Law Operationally and Arbitrarily ", intentionally and knowingly done Concert Of Action of "Unlawful Detainment of Contract and Civil Rights and Extortion" as intentionally and knowingly joined and directed by Governors Chiles, MacKay, Bush, Crist and now Rick Scott began at the time about 1991, by Governor Chiles and Lt. Governor MacKay with the intentional assistance of Florida Bar Officers John Harkness and John Berry and Florida Department of Law Enforcement Guy Tunnel and members of the Florida Supreme Court with the Chapin friends the Clinton's to and for political gain assist Orange County Chairperson Linda Chapin conceal the legal malpractice of her husband Bruce Chapin and his law firm then and now still liable to Townsend/Future Marketing due to the Continuing Concert of Actions and the Malpractice and Intentional Torts done by the O'Neill, Chapin, Liebman, Marks, Popper, Cooper ET AL law partner David H. Popper to conceal his "Ineffective Services" malfeasance in handling the Townsend/Future Marketing discovery of rights and Business Records and separation from an August 7, 1987, "Brokerage Agreement" with Charles E. Lane Jr. a.k.a. Sabal Marketing as Popper admits in his April 1988, letter and in consultations with Townsend.

Upon and with the "Ineffective Services" ruling for these Plaintiffs with "Clean Hands" by this 11th Circuit Court, Townsend informed the Defendants herein and "others DOE" about said facts and included these details in the timely filed and still ongoing lower Circuit Court Case[xix] against one of these Plaintiffs "Ineffective Counsels", Attorney Heather M. Gray (Gray), who had been retained 02/2003 and paid 3/14/2003, for her "specialized skills" and promised "Honorable Services" to assist Townsend with Scruggs to obtain all "discovery" pertaining to the Sabal Records and FBCCP/CPCS Records and write an appeal and litigate each underlying issue(s) in the "Concert Of Actions" by these conspiring extorting and Maliciously Prosecuting Lane concealing Defendants since 1987 and "others

DOE" as by doing such would save Townsend's relationships with his wife and kids and non-sect Church members and stop the deprivations stemming from the McKay and other Criminal Plots.

Even included in this Townsend ET AL v. Gray ET AL 06-6005 case shows and proves: the "Ineffective Counsel(s)"; the collusion since Popper-Chapin; the ruling of the 5th DCA and reversal of Judge Orfinger at first per **Robinson** 9/1/2006, admitting Judge Powell ET AL committed error in not allowing Townsend discovery of Lane's Records as Judge Muszynski had ordered with deadlines Popper and Williams ignored and then their showing singularity against Townsend ET AL again dismissing a case still without allowing discovery which produced later from the Lane/Sabal case and "other" sources showed Townsend was in collusion by Lane and "others" entrapped by fraud, extortion, kickbacks, witness tampering, lost income, emotional distress and deprived of Constitutional and Contract Rights and money.

And now the same Judge Orfinger reverses himself and excuses Judge Crenshaw and her co-participants who on 9/7/2006, also stripped Townsend ET AL of our discovery rights even of our own FBCCP/CPCS "Religious Society" property and kids who were abducted illegally by the same collusion working through Defendants since 1991 by the fully informed David Gibbs III and the CLA and their "Co-participants named as Defendants herein" and "Others DOE" still with discovery able to be further connected.

With this proved how have Townsend ET AL Plaintiffs had "Effective Counsel" other than by or what Townsend has honestly advocated per the Florida Black Law Rules and Florida Bar Rules Regulating the Florida Bar:
Rule 4-1.6 Confidentiality of Information (b) When a Lawyer Must Reveal Information. A lawyer shall reveal such information to the extent the lawyer believes necessary: (1) to prevent a client from committing a crime;…"
Rule 4-1.7 Conflict of Interest
Rule 4-1.8 Conflict of Interest; Prohibited Transactions (a)Business Transactions …A lawyer shall not enter into a business transaction…(b) Using Information to Disadvantage of Client.
Rule 4-1.9 Conflict of Interest: Former Client
Rule 4-1.10 Imputed Disqualification
Rule 4-1.11 Successive Government and Private Employment
Rule 4-1.13 Organization as Client (ALL PARTS emphasis added.)
Rule 4-2.1 Advisor
Rule 4.4.1 Truthfulness in Statements to Others
Rule 4-4.2 Communication with Person Represented by Counsel

Rule 4-4.3 Dealing with unrepresented persons "…the lawyer shall make reasonable efforts to correct the misunderstanding."
Rule 4-4.4 Respect for Rights of Third Persons
Rule 4-5.1 Responsibilities of a Partner or Supervisory Lawyer

When "alias" "Government Persons" have conspired to at all times make Townsend the "Liar" then their Collusion is always going to be one or more degrees off of the "1% Truth" Townsend has stated which then always as now shown since 1987 has proved to be a fraud to deprivate Plaintiffs to deny them "Honest Services" (18 USC §1346), warrants Criminal Charges to a Grand Jury by Frauds of Honest Services of Public Officials and Employees doing Obstruction of Justice (18 USC §1341 and §1343 and §1503). Thus the fact that this case has had to after the previous finding of this Court now come back to this court the Racketeer Influence and Corrupt Organization Act is proved by these Defendants and "Others Doe".(18 USC §§1961-1968, especially §1964 (c)). By the Conspiracy of "Government Officials" to always make Townsend in the Public Light to always look like the "Liar" then these non government persons have done and shown their criminal acts directly in the face of these "Government Persons" who became their willful accomplices in these criminal acts since 1987 began by Lane and Williams conspiring to hide and continue their drug uses and other criminal acts to keep Townsend from his business practices and FBCCP Duties. These Civil Rights Obstructions appear to be lead when Chapin used his influences for the O'Neill, Chapin firm with himself and his wife and included others like persons as Robert O'Neill since 1993 in the U.S. Attorney's Office and DOJ Civil Rights Division. Also in keeping with the facts told to "Government Persons" at the time of the Chapin and Popper Bribes after the hearing with "Judge" Stroker, the bribe to "drop pursuing the case" and be paid off by "find us restaurant sites". Robert O'Neill owning the Dublin Pub Inc causes suspicion as to why all these facts of crimes Townsend has proved have not received assistance from the U.S. Attorneys, DOJ, FBI, County and State Officers.

Gray was advised that Randall Townsend believed production of the truthful Sabal Records and FBCCP/CPCS Records would vindicate his and "Other" claims and thus: (1) save his relationship with his kids and possibly his marriage; (2) reveal to the FBCCP members the "Sect" frauds and the "Sects" illegal use of "Color of Law" Deputies Jeffers, Howlett, Smoak, Corbin and "others" and their Superior Officers were using to "impede" Townsend's investigation of illegal acts of the "Sect" as confessed by FBCCP Administrator Elbert Nasworthy in the October 1994, Business Meeting Minutes.

Townsend and "other" Church and School members as Plaintiffs still demand as was the FBCCP Leadership practices prior to the arrival of Jeffers, Leatherman and Beck to upon request openly review all business records of FBCCP/CPCS since or about 1994 even as FBCCP/CPCS Administrator Nasworthy in the October 1994 Business Meeting confronted with deceptions admitted By-Laws violations and possible illegal acts that not been disclosed by non-member Deputy Tim Jeffers, Gibbs, Grant ET AL as Jeffers promised to do to the members who have been deceived by his lack of integrity as a Deputy to investigate for the members the frauds by "Sect" Nasworthy, Beck, Powell, Meister and "Others DOE" as required by the FBCCP By-Laws despite over 1000 demands per the By-Laws and Legal Actions even as "required" defensive "discovery" as Respondent(s) to Federal Charges to, from and by our "Government Persons" as our own Sheriff Deputies, FDLE, State and Federal Officers, Lawyers, Judges and "others DOE" willfully using Jeffers, Howlett, Beck ET AL, Karen Harrod Townsend and "Others Doe" to "defame Townsend in a false public light" leading to bringing Federal Criminal Charges alleged against Townsend in Cases 01-15813 and 01-15814 and 02-4974. Instead, Appellants have proved their deprivations caused by the "Jeffers ET AL alias law enforcers" "unlawful invasion of our privacy" and Constitutional Rights and violations of our By-Laws and fraudulent reporting and unjust enrichment in their intentional torts still ongoing to deprivate FBCCP/CPCS and Tax Payers. When the 1994-1999, deprivations and "missing $43,000+" and 18005 Gunn Highway Permits project became too much to explain to the members, Townsend as the FBCCP Supreme Court Leader on 9/8/1999, was banned from the property, "impeded" from his children abducted 10/20/1999 and unlawfully per the law and By-Laws removed from his duties by the "Sect". At each situation or event Jeffers ET AL "under color of law" has violated the By-Laws and "Due and Equal Process" proving the RICO and violations of Religious Rights and "Fraud, Collusion and Arbitrariness" of Defendants and "Others DOE".

In the related cases[xx] to the 13th Circuit and then to the 2 DCA as Gray was retained to assist what was at that time believed to be the "Honorable Services" of Attorney Charles H. Scruggs III hired and retained from July 2000 through 9/2003 providing allegedly "Honest legal counsel" to Townsend on all matters even as Townsend was acting Pro Se in his Appeals through to the U.S. Supreme Court in the original Popper/Chapin/Williams/Lane ET AL RICO Acts.

Facts revealed and even by Scruggs admitted to Judge Stoddard per the transcript February xxxx, show he intentionally failed to provide his "Honest Services" and promised acts of discovery so to reunite Townsend with his kids and Church Members because of his fear of these "government persons"[xxi].

Further, it is now alleged and believed Scruggs revealed his intentional participation the McKay Concert of Actions on 9/30/2003, when he failed to inform Townsend why he became so enraged at the ruling by Judge Marva Crenshaw (Crenshaw) allowing Townsend to proceed with a Malicious Prosecution claim against Ron Beck knowing this would expand to reveal the Concert of Actions now proved herein. Not known to Plaintiffs at that time was the intentions later exposed by Crenshaw of her prejudice and bias to intentionally assist in the Torts of the McKay Plot as she intentionally unlawfully acted to conceal and "impede" Townsend ET AL's lawful acts against Beck, with the "Government Persons". Both Crenshaw and her husband as a Hillsborough County Sheriff's Deputy by their participation in the McKay Plot have by Quid Pro Quo been unjustly enriched by their Co-Defendants and "others DOE".

JEB BUSH---Did The Quid Pro Quo Collusion in his "Plot" appointing Marva Crenshaw to the 13th Circuit Court taking over the Judge Arnold Cases including Townsend v. Beck 02-03812 who from 2003-9/2006 by her acts and admissions revealed her goal was to continue the Concert of Actions of her Superior Officers and protect their plots, exposure and liability.

Charlie Crist for Ouid Pro Quo, as Governor, then rewards Crenshaw and then appoints her to the 2nd DCA. And rewards Scruggs to Regional Counsel when legal experts know of their open criminal acts.

Marva Crenshaw as a Judge is told and her co-participants are able to by intentional delay and her "impeding", illegally by the ruling of the 5th DCA and Judge Orfinger on September 1, 2006 in this same related Townsend case block discovery by Plaintiffs, rule to allow Defendants to do "unlawful invasion of privacy", continue emotional distress, deprivations and detainment and impede Religious Society and Civil Rights so to continue at the coached operational directives of her Superiors and in a self-dealing conflict of interest for herself and her husband also a HCSO Deputy continue the advantage of Sheriff Gee, Col. Gary Terry and their friends and Sheriff Deputies Jeffers, Howlett, Smoak, their Superiors and "Others Doe" to "conceal and fix" this case as admitted by Col. Gary Terry and Deputy Renato Martinez in 2007.

The Concert of Actions is further proved by Crenshaw on May 10, 2006, admitting the collusion of Defendants but trying to conceal the deprivations caused only to Beck and not those who concealed Becks illegal felonies and for over 3 hours rewriting the Malicious Prosecution Count and proofs as Townsend always alleged but had to recuse herself when directly confronted with her intentional violations of the law for her Government and other co-participants as Defendants herein and "Others DOE" as further discovery Crenshaw prevented now connects. The words of Judge Crenshaw were even justly used as a Template in this related case to include all Defendants and "Others Doe" yet judges Cook at the directives of her co-participants ignores the rulings and even the May 2006, written legal complaint of Judge Crenshaw used as the template in Townsend ET AL v. Gray ET AL.(06-6005) knowing other collusion will be collected for Public exposure.

The ruling of Judge Crenshaw and the partial discovery withheld illegally by her and her co-participants was sufficient for the Religious Society Members to terminate Beck and "Others Doe" in approval of what Townsend speaks on their behalf.

Jeb Bush---If there was any doubt look at the appointments and praises the Bush Brothers gave these persons who knew the crimes Townsend reported and who have conspired to "impede" Townsend:

Ken Conner the former candidate for Governor who opposed Jeb in 1994 and who became his lawyer who was the legal partner with Mel Martinez.

Jeb retained the FDLE Director Guy Tummel until he resigned.

David Gibbs III, the CLA, Christian Law Association lawyer for the Bush Brothers in the Terry Schiavo case.

JOHN GRANT---If there was doubt of a conspiracy to do fraud to Townsend one must just read the frauds and threats from John Grant's e-mail to Townsend even after proofs of the terminations of several "pastors" for crimes, Grant says Townsend is a fraud and should be Baker Acted and informs Sheriff Gee to threaten Townsend. To show the "Government" collusion no one sees this extortion to not file the lawsuit and report criminal acts or see your kids or go to your church is not a crime by Co-participants. So when did Grant begin this HOSTILE and ILLEGAL COSPIRED FRAUD. IT APPEARS IT IS AS EARLY AS 1994, WHEN DR. BERRY TOLD TOWNSEND AND GRANT OF THE NASWORTHY AND FINANCE COMMITTEE CRIMES!

Judge Marva Crenshaw was appointed by Jeb and then appointed by Crist to the 2DCA.

Judge Martha Cook worked for Jeb and was appointed by him to the bench.

Charlie Crist had as his chief of Staff, now a 1st DCA Judge per Crist, Lori Sellers Rowe a relative of Kmart Pharmacist for Townsend at the store where Townsend was "fired" for frauds now proved created by defendants.

These are just a few of the connections and proofs of conspiracy.

Judge Merryday, We now know by overwhelming evidence reversed himself in his ruling against these Plaintiffs to dismiss our case as Merryday with his prejudice, bias and fear determined as he did in his Aisenberg v. HCSO Rulings sought to conceal and protect the HCSO conspiring Superior Officers Gary Terry, David Gee and "Others" and their Superior Officers Co-Participants as the same charged now in this Complaint.

Judge Wilson "impeded" Plaintiff hiring "Honest counsel" by his refusal to grant discovery of FBCCP Records and Townsend 's control over FBCCP Property

Judge Martha Cook being appointed by Defendant Jeb Bush (SC02-1213) and promoting herself as a member of Bell Shoals Baptist Church where fellow member Defendant Sheriff Gee and "Others" attends or attended as Nasworthy who created the original "Sect" violations of Contracts at FBCCP by his intent to get IRS relief prevented connecting the concert of actions by blocking Pellegrini co-participants based on these connections had a duty to disclose this information and recuse herself.

Jeb nor Charlie nor others from what records are known to this Appellant and public filed charges or investigated the illegal acts these lawyers and judges have been proved to have ruled based on the Judge Orfinger original Robinson ruling verses his 2011, reversal.

However, Judge Canady recused the 13th Circuit, The 2 DCA, The 5th DCA, The Florida Supreme Court and himself not for future bias but for past criminal malfeasance acknowledging and admitting Townsend's claims since 1987.

Judge Canady then recused the Florida Supreme Court for past actions not future prejudice.

Judge Peggy Ann Quince, worked at the Department of Legal Affairs Tampa Office in 1993, as McCarthy for the State Attorney's Office and Townsend alleges Quince should have revealed this connection and recused herself.

Federal Judge Kovachevich rules were followed in the Amended Complaint filing yet she "Impeded" Discovery rather than recuse herself.

Federal Judge Conway knows her judges are continuing "FRAUD" and various other RICO Crimes.

Judge Presnell was told by Townsend of Lane and Williams crimes of extortion, frauds, kickbacks and drug use and cannot remain silent or he still aides and abets criminal acts he has been told and proved since the 1990's.

U.S. Attorneys Officers Robert O'Neill and their Superior Officers are exposed and connected as after gaining legal Rulings and admissions of criminal acts from this 11th Circuit, Florida Supreme Court Chief Judge Canady, 5th DCA Judges including Judge Orfinger, The Florida Bar, Judge Crenshaw, Federal Judges, Sheriffs and their Deputies and "Others" the singularity by Defendants and "Others Doe" against these Plaintiffs is exposed and proved.

U.S. Attorneys and F.B.I. persons who said they would originally help Townsend were soon after reassigned or fired, in the U.S. Attorney's scandal.

FBI, Agent Gross and others have been repeatedly informed.

DOJ, Agents have been repeatedly informed.

Defendants have gained an Unconstitutional RICO Enterprise and Monopoly on what is lawful depriving citizens of our Constitutional Right to a Jury Trial in that they can order Attorneys and Judges as in RUBIN to contain the truth and intentionally promote known false testimony.

Government Persons then Use **Jenkins v. State**[xxii] to conceal "Government Officers Frauds" out of context as a fraud in which the voters approved said process. Then use their own discretion to intentionally not take an affidavit of a victim trying to report a crime(s) or then empower a "Grand Jury" to conceal the "Government Persons" conspiracy of the matters. All while using our own Tax Dollars and in this case our FBCCP "Religious Society" Designated Funds against us by Frauds, Fraudulent Reporting of False Documents and by countless Intentional Fraudulent Inducements.

Proved is as Townsend alleged in the earlier case PCA was trickery and fraud used by Judges and lawyers to continue to conceal the illusion of justice and obstruct justice from victims further abused by those in the "Government Persons" Control as an Anti-Trust misrepresenting Jenkins v. State findings based on the March 11, 1980, Citizens vote for restructuring the courts. Citizens in no way meant they gave up their rights to get a "fair day" in court protected Civil Right. Therefore for "Government Persons" to use this PCA for the concealment of frauds of "Government Persons" this is obstruction of justice, criminal and unconstitutional. Plaintiffs allege this finding of the special commission is a fraud verses the intent of the voters and unconstitutional based on violations of "Due and Equal Process".

Plaintiff Citizens were not informed nor protected from our loss of "Due Process" that using the PCA could mean this allowed the Judges to become a RICO Gang making rulings bases on no common law or rules of courts and then without intervention of a jury of citizens have a right to redress a removal of a Civil Right or finding of a Judge based on known fraudulent evidence. The Robinson Ruling by the 5th DCA in 2006, confirms the position Townsend advocated in his claims of the illegal and conspired acts of Judge Powell, Popper, Chapins, Williams, Lane and "Others" at the time beginning in January 1993 when the coerced and forced alleged "settlement" was illegally done by Powell ET AL telling Townsend to take the $5,000 settlement and get nothing from Lane, Williams, Popper and Chapin and "Others" losing your business opportunities from 1987-1993, and beyond and "shut up" or "go to jail". The bully threats of shut up or be illegally detained message to Townsend and Townsend alleges also to his kids per their extortion/ransom note[xxiii] of 10/20/1999, has been said by the: Jeffers, Howlett, Corbin and Smoak and "Others" "Deputies Gang"; the "Harrods Gang"; Scruggs; Judges; Sheriffs via messages delivered by their agents and by the Grant E-mails.

SUMMARY OF THE ARGUMENT

President George W. Bush, himself, gives Appellants their Argument that each Defendant and "others DOE" have abused their discretion, granted themselves illegal immunity and violated standards and laws he says even he will follow and did follow and or what is wrong with the Concert of Actions by these Defendants and "Others Doe in this case since 1987, as the teachings of our President George W. Bush is what he taught was wrong and criminal about Iraq and Saddam as Bush even made sure Saddam got a fair trial per the law.

It is illogical not to think George W. Bush, when he received the Townsend letter and was advised of the earlier Supreme Court filings against Lane, Chapin, Popper and Williams and the collusion with Judges and the Orange County Commissioners of which he chose Mel Martinez did not pick up the phone and say Jeb, what is this all about.

Rick Scott, Pam Bondi, Mark Ober, David Gee, Robert O'Neill, and our Federal Judges, Where are our "Government Persons" in this cause making sure Naïve Victim Citizens get a "fair or any jury trial" rather than let these alias "law enforcers" do the crimes and you give victims no relief when you know these Defendants have intentionally filed "False Reports" in what are to be Honorable Courts since 1988.

Excluding the mass murders or Weapons of Mass Destruction albeit the frauds since 1987 have had the same destruction on these masses of citizens trying to be civil all of the other same corruption has been carried out by these "Government Persons", Defendants and "others DOE" on a "Religious Society" and naïve Citizens.

George W. Bush, Attorney General Anthony Gonzales, the DOJ, FBI, our Attorney General Pam Bondi and now our Governors Rick Scott, Jeb Bush, Charlie Crist, FDLE, and Sheriffs Gee, Coats, White and Judd and "Others" were dutifully informed and legally served papers of the criminal acts by Defendants and "others Doe" and recklessly, intentionally and knowingly still assist the Defendants while it was in their Fiduciary Duty as the same Fiduciary Duty of each "Government Person" to stop these Defendants and "Others Doe" acts.

These acts just to name a few include: Treason to the Due and Equal Process, Civil Operation of our Constitutions; Unlawful Detention and Abduction of persons, Business Rights and Property Rights; Destruction of Religious Societies Freedom of Worship per our By-Laws; Destruction of Families; Unlawful Interference and Abduction of Children from parents; Attempted Murder; Abuse and Frauds on minors through to the elderly; Batteries by Law Enforcers "Gangs" and "Others"; Violations of Civil Rights as Speech, Assembly, Worship, holding Church Officer and teaching positions and Voting and Voting without frauds; Tort Interference with Business Relations; Illegal Tax evasion; Kickbacks; RICO; Anti-Trust; Illegal Detainment; Concealment of Corrupt Politicians and other "Government Persons" by Concealment of what is to be Public Records; Extortion; Obstruction of Justice and more. Townsend at multiple and various times has since 1987, proved a complete legal case on the Concert of Actions began by the Frauds of Lane and his "Lane Gang" to conceal his criminal acts (Drug Use, Extortion, Paying Kickbacks, Witness Tampering) leading to all these other Crimes known to our "Government Persons" since the first meeting with McCarthy in November 1987, as she wrote in March 1988, yet our "Government Persons" will not allow the "Government Veil" or the Corporate Veil of: Lane ET AL. since 1987; FBCCP/CPCS since 1994; Sunbelt since 1999; Kmart/Sear since 2005; to be exposed as all along the way Townsend will be vindicated and the falsehoods, defamation's and damages as expressed in the John Grant e-mail's and the Karen Harrod Townsend e-mails claims filed with the Palomino court in case 01-15814 alleging the claims of Grant about Townsend (need of being "Baker Acted") would be proved to have continued the deprivations.

All each "Government Person" and Judges and now including Judge Kovachevich is doing is trying to unlawfully "impede" more production to prove Townsend is right since 1987 about the corruption of Lane and those who were paid off by him or his "Gang" or received Quid Pro Quo rewards for their ignoring our Laws and Contracts.

Judge Kovachevich is bold enough to ignore the: rulings of this 11th Circuit Court of Appeals in 2008, regarding "ineffective counsels"; conceding and admitting "Check Mate" by Florida Supreme Court Judge Charles Canady then recusing the lower courts and himself; the 5th DCA Robinson Ruling confirming what Townsend exposed to Judge Powell in July 11, 1994, known to him prior to his Final Judgement Order of July 19, 1994, as the Chapin ET AL Plot was clearly pled and exposed as the 5th DCA on 9/1/2006, confirmed the legal position of Townsend as did Judge Crenshaw in May – September 7, 2006, yet when Townsend refused another "Government Persons" bribe, she and her co-participants had to dismiss the case to conceal more productions of their ongoing Concert of Actions.

Some of the best evidence produced to date to show the RICO Conspiracy of these Defendants and "Others DOE" is to look at the threats and hypocrisy of Townsend's "ineffective counsels" own writings in the exhibits included and actions to show their "Hate" towards Townsend their "Client" who they agreed to provide "Honest Services" (Popper letters, Chapin letters, Scruggs letter, Grant e-mails).

So the question is when Townsend or any citizen dials "9-11", to report a crime of a "citizen", "alias clergy" or "alias Government Person" or even of our alleged "honorable Lawyer" and "alias Judges" can we trust any "Government Person" to honor our laws per the Oath they took? It appears not in Florida or from Washington D.C. per the singularity proved in this case or in what these defendants and "others" do to other families who become unwilling victims of DCF as an agent of HUD and the DOJ and these defendants.

It has been an abuse of discretion and "ineffective counsel" in "impeding Townsend's Honest Business and Citizens Practices" and assisting Lane's "Gangs" Fraud, RICO and Anti-Trust Extortion Practices since 1987. Further, Lane still advertises on his Sealane company web page he has the Foster Grant Sunglass Line which per the exhibits herein he gained because of the efforts of Townsend and the then criminal acts of Lane ET AL, Williams ET AL, Popper ET AL, Chapins ET AL, Landis ET AL, McCarthy ET AL, Jeb Bush ET AL, Ken Conner ET AL, Mel Martinez ET AL, Judges Powell, Stroker, and "Others" so to not expose their Torts they told and required Townsend to "Do Not discuss Lane your Clients" and "Do

not Contact the Lines" and "Do not take your commissions or payments for your services to them directly from them" or you will violate the Non-Compete and also be charged criminally with "Witness Tampering".

Even March 16, 1990, a "Mutual General Release, Non Disclosure Agreement and Settlement Offer" was signed by Lane agreeing to pay Townsend $8,000.00. The offer was even increased but was well short of any jury verdict Townsend would have gained due to the production of truth to a jury knowing what is now proved by the evidence these Counselors and Others continue to "impede". Townsend refused the Bribery, Extortion and Threats of Popper, Williams and "Lane Gang" and insisted on going to Trial on the Merits. Popper claimed if Townsend took the settlement he could then legally just restart his business.

Even in January 1993, Townsend objected to the threats, bribery, extortion of the "ineffective counsels" and from prejudices Quid Pro Quo rewarded Judge Powell to show your records, take the $5000 or go to jail and Townsend still timely files multiple litigations and complaints to "law enforcers"

Even in 9/7/2006, Townsend objected to the threats, bribery and extortion of the "ineffective counsels" and from prejudiced Quid Pro Quo rewarded Judge Crenshaw to "shut up, I am trying to get you a lot of money" but Townsend demands as since 1987, expose all Lane's Gangs Records and have a "jury trial" on all issues.

Until the 9/1/2006, written Order of Judge Orfinger as vindication of Townsend, not discovered until 2011, Townsend and those for whom he speaks were and still are without trust in our leaders, deprivated, extorted and emotionally distressed and in fear by the way defendants and "Others DOE" acted and still acts in blatant defiance of our laws and now even more as we understand the continuing corruption being extended by the ruling of these Middle District Judges after being informed of these deprivations and even most of these defendants admitting their criminal acts. Further the reversal of prejudiced Judge Orfinger in 2011, verses his "Honest Services" without extortion in 2006, and shows criminal RICO conspiracy from the top down on each defendant and each Plaintiff in this case.

By Bruce and Linda Chapin and their "Gang" able to aided and abetted by the Democrats and "Others" and Jeb Bush being aided and abetted by the Republicans and "Others" each as Politicians and as "Government Persons" have violated and are deprivating Townsend and those for whom he speaks.

ARGUMENT

1. Per the 7th Circuit Court of Appeals in Kenner v. C.I.R., 387 F.3d 689, (1968); 7 Moores Federal Practice, 2d ed., p. 512, ¶ 60.23, states "a decision produced by fraud on upon the courts is not in essence a decision at all, and never becomes final."…"Fraud upon the court makes void the orders and judgements of that court." A judge taking a bribe or acting with prejudice can be convicted of intentionally doing fraud in a case inside his own court. So in this case only Judge Muszynski and Judge Moody, Jr. are exempt as each other judge clearly knew their roles in the frauds started by the Lane "Gang" and each did a tort of fraud to continue the conspiracy. And as Townsend quoted in his 1/21, 1999, Supplemental Authority to the 5th DCA, Exhibit xxx herein, "34. AM Jur. P. 188 Section 231, the author says, "Fraudulent concealment of a cause of action from the one in whom it resides, by the one against who it lies, constitutes an implied exception to the statue of limitations. Emphasis Added."
2. This is a case of Charles E. Lane, Jr. and his "Gang" having several goals (1) Save his business from extinction and (2) assist Joe Ligori of Nova Sales, Inc. as Townsend and Lanes former employer from losing business to Townsend starting his new business Future Marketing at the request of many accounts listed in Section 2 of the Joint venture. (3) Do not let Townsend expose the illegal acts including "Extortion" and "Kick-Backs" tactics by Lane and Ligori and "Others"; all Lane's and his "Gangs" connections to the money Lane gained in or since 1987 will show to or should have been property of Townsend. Additionally, the Quid Pro Quo and Kickbacks will be exposed especially those being derived from Sunglass Sales of either the Bonneau or Foster Grant Companies since 1987.
3. When Lane showed up at the Publix Corporate Office to meet with Townsend on August 7, 1987, to sign the "Joint Venture" as partners, Lane insisted he just forgot the folder with all the contracts of the lines listed in Section 1. Of the Joint Venture. Not yet knowing of the frauds that Lane did not have contracts with these lines, Townsend and Lane visited several offices of Publix Executives introducing us as "partners" and then had a Publix secretary notarize the "Joint Venture".
4. Shortly after contacting each line to get sales materials and become updated on their previous sales and status Townsend slowly and partially learned of Lanes Frauds as their were no contracts, there were no sales of which a Draw could be earned and most of all due to Lanes actions the lines were hesitant to even enter into a new contract. Due to the lack of reputation Lane had with the clients due to his previous unethical acts it seemed logical that should the "Second Chance for Lane" relationships end, Townsend would be seen as the best for the success with the accounts. New contracts were generated with the lines understanding Townsend as the solution to Lanes problems as Townsend was trying to give Lane a second chance as Lane was lying he had learned his lessons and was cleaning up his acts.
5. Townsend and the lines gave several warnings to Lane during August –November 1987, and in early November 1987, when Lane was caught in the Tampa Hotel with drugs, Townsend went immediately to attorney Patricia McCarthy to get legally away from Lane and his "Gang" as quickly and cleanly as possible.
6. Williams we learned much later as the friend of Lane since Jr. High school to conceal Lanes practices knowingly violated his Oath and Black Law Rules as an Attorney and

did frauds to continue the crimes of Lane. Lane advised Williams and Lane were "Drug Buddies" as well as Friends since Jr High School.

7. Williams stalled records productions Townsend demanded to show how Townsend had been a crucial part in what was believed at that time renewing the Brokerage Contracts. It was not uncommon for these types of contracts to have a yearly ending date or a "notice to separate" clause with only a 30 day notice. What the production of Lane showed in 1992 was that how empty the promises of Lane had been in 1987. The failure of McCarthy and Popper to do Subpoena's lets the frauds of Lane and his "Gang" and Williams damage Townsend, the lines and the accounts. Williams insisted Townsend after 1/1/1988, was in Tort Interference with the Lane alleged existing Contracts of August 7, 1987, if Townsend even made a phone call to the lines to tell them the Joint Venture was over. Based on the advise of McCarthy and Popper, Townsend heeded their advice and "took the high road" as they advised and relied on them as attorneys (McCarthy, Popper and Williams) per their Oaths and Black Law Rules to also support Townsend in Honest Services.
8. Lane on the other hand advised all the lines and accounts with frauds to defame Townsend.
9. Popper per his April 1988 letter advised Townsend he could separate the New Lines but just in case don't talk to the lines in section 1 and stay clear from Publix and do not discuss Lane with the clients.
10. Lane was per the contract timely advised of Townsend's agreements with Florida Reps and "Others" and Lane even spoke with Florida Rep's and "Others" prior to November 1987, to try to do a Joint Venture with us to maximize the coverage for our lines but Florida Rep's and "Others" did not Trust Lane and even advised me not to Trust Lane nor give him a second chance.
11. The Chapin letter shows his frauds about "Show me yours and Lane will show you his" frauds that never happened. Instead Townsend's records productions only allowed the collusion of Chapin's and "DOE Others", Williams, Powell, Lane and Ligori and their "Gang" to do more frauds.
12. The letter from Scruggs shows his true demented Mens Rea motives, intent, frauds about his "honest services"
13. The e-mails from Grant call Townsend "Needing to be evaluated and Baker Acted" but now it shows and proves Townsend in the only one always telling the truth.
14. The statements and representation of David Gibbs for Jeb Bush, Charlie Crist, Ken Conner and "Others" even having the matter presented on the floor of Congress in the Terry Schiavo Case clearly show his hypocritical argument that the Church Rights were stronger than the States Rights to destroy the family relationship of Terry and her family when Gibbs, Bushs, Conner, Crist all knew they were aiding and abetting "Government Persons" as Jeffers, Corbin, Howlett, Smoak, Registered Agent Grant ET AL aiding and abetting "alias" "clergy" as the "Beck Gang" to destroy the Church Families and do frauds to the Religious Society and to the Citizens in the frauds of the Eminent Domain Case and since 1994 violation of By-Laws just as ruling in Umberger v. Johns and xxxxxxxxxxxxxx. Additionally per Florida Statues: §768 these Defendants knew their actions were "Intentional Torts"; violations of §498(Florida Uniform Land Sales Practices Law),§517 (Florida Securities and Investor Protection Act), §542 (Florida Antitrust Act of 1980), §895 (Florida

Racketeer Influenced and Corrupt Organization Act) [§768.81(4)(b) Fla. Stat.]. The collusion to extort Townsend to limit his claims only to Beck, by the collusion of Judge Crenshaw and Dickinson & Gibbons and their "Gang" in 2006, in Townsend v. Beck 02-03812, Townsend viewed as a fraud, extortion, a bribe, and a violation of Florida Constitution Article I. Section 3, as a matter of public importance a Jury of Citizens must know of all the crimes and the damages by all their "Government Persons". Production of all records Townsend has demanded from the "Gangs" since 1987 is necessary for a lawful determination of each participants role in the Theories Under with Joint Liability is Imposed. Of the four types: Vicarious, Derivative, independent tort and civil conspiracy appear to apply to all Defendants and "Others DOE" but more production is necessary to complete a full case of defense based on the allegations that Townsend as a non-lawyer is in need of being "Baker Acted" and suffering from a mental breakdown thinking the whole world is against him if one takes the position of Karen Harrod Townsend, the "alias clergy" even said from a pulpit and the attorneys Scruggs and Grant per their letters and e-mails.

15. While Judge Crenshaw even wrote during an over 3 hour hearing May 2006, a Malicious Prosecution Count in collusion with Denny and their co-participants against Beck and then sought to have Townsend shut up, she could she could not allow Townsend to plead the six parts of a Malicious Prosecution Count as this would show joint liabilities of them all going all the way back to the conspiracy began by these "ineffective counsels" to conceal their conspiracy and torts and "Lanes Gangs Torts".

16. Thus even though the template of Crenshaw was justly used in the Third Amended Townsend v. Beck 02-03812 case it had to be shut down without discovery by Crenshaw and her co-participants. Even the Townsend v. Gray case even after providing proof Gray was disbarred for even the same intentional misconduct and torts done to her clients Townsend ET AL, Judge Cook had to shut down the case without discovery. The same pattern of conspiracy exists from Powell through now to Judges of the Middle District of Tampa now in 2012.

17. The Florida Bar, JQC, FDLE, Governors, FBI, Judges and Sheriffs and other "Law Enforcers and Government Persons" shows their hypocrisy while aiding and abetting these "Lane Gang" Defendants by their what may have happened "Private" reprimands against Popper, Chapin and Williams and Others and then the concealment of the "Jeffers/Beck Gang" and then the Public "Disbarment of Gray" yet they shut down Townsend showing the "Ineffective Services" of Gray was the same of them all. When one reviews how each of these law firms have split it is clear they are trying to avoid joint liability. The Florida Bar as specifically ignoring Townsend's Amicus Brief[xxiv] regarding the Disbarment of Gray in light of these same facts as Judge Orfinger and the 5th DCA and the ruling of judge Crenshaw in 2006 (9/1 and 9/7) clearly shows their hypocrisy to say one thing and then violate their own laws and rules just to continue to damage Townsend and any honesty and truth Townsend states per the laws and facts.

18. So based on the above facts the answers to these questions must be as follow:

I. Whether these Appellants as by the length of this case especially now

after the previous finding of this Eleventh Circuit Court and returning with that ruling of "Ineffective Counsels" including this Defendant Heather Gray (disbarred[xxv] for frauds and abandoning clients rights), back through the State Courts (13th Circuit, 2nd DCA, 5th DCA, Florida Supreme Court) it is proved this "ineffective counsel" is the intentional ongoing results of the Mens Rea plot for "ineffective counsel" by "Whistle Blower" Townsend's Attorneys (McCarthy, Landis, Popper, Chapin, Gibbs, Grant, Scruggs, Gray, Dickinson & Gibbons) and "Other" "Law Enforcers" to: (1) never let Townsend as a non-lawyer, "dumb ole country boy"Civilly or Criminally discover truth; present truth of crimes to a jury; or look "honest" as a legal or ethical authority of his or "others" to his family, peers, and Church Members: Civil Business Rights; Civil Rights, His Church and Members Rights; (2) Never let Townsend make Charges of Reporting Criminal Activities of Defendants and "Others Doe"; to a jury or to his "Church Members"; (3) With "Government Persons" continue The "ineffective counsel" plot conspired to conceal their malfeasance and thus abuse Townsend's rights of "Discovery"; reputation, money and then to use more extortion in their Concert of Actions, then they extorted and kidnapped his Children in 1999 by proved fabrication of evidence and prejudice from "Government Persons" to put Townsend in a "False Public Light" to the Church and Citizens whom Defendants and "Others" still conspire to deceive;
have ever had "Competent Counsel" for an "Honest Day" in: Civil Courts on issues since on or about 1987; or also by the conspiracy of these "Government Persons" intentionally doing "ineffective counsel" so to "impede" Townsend to never look "truthful" about reporting their Torts as in the invasion of our privacy and contract of membership of the FBCCP/CPCS as a Religious Society since 1994; as the previous findings of this Eleventh Circuit Court was in a polite way admitting "ineffective counsel" knowing "Counsels" and "others" may be or are involved in criminal acts now confirmed.

Answer—No Full Discovery as even per Contract Rights has been made available or shown to Townsend or fully exposed for Townsend to even discuss with Honorable Counsel or to even present to FBCCP Members or to an Honorable Judge, so no Effective Due Process and Representation has ever assisted these still victimized Appellants.

II. Under the law of Joint Liability, if this Honorable Eleventh Circuit Court found in 2008, in favor of Townsend and those for whom he speaks

suffering “ineffective counsel”, naming Counselors (Gray, Scruggs, Grant, Gibbs, Denny, Rolfes, and “others DOE”) and Florida Supreme Court Chief Judge Charles Canady in 2011, basically admitted “Check Mate” due to acknowledging “Past” not Future “prejudice” of Judges granting Prejudicial favor to Townsend’s Counsels (Chapin, Popper, Williams ruled by 5th DCA Judges Orfinger, Sawaya, and Lawson 9/1/2006 in “Fraud on the Court” with 18th Circuit Judges, Florida Bar Officers, Government Persons and “others DOE” as Townsend alleges silence from other Bar Members constitutes “constructed fraud” Extrinsically Fraud extending the underlying frauds) verses this Townsend as alleged Mentally and Legally needing “Baker Acted” as publicly written by Counsel Grant but unlawfully and prejudicially said to Townsend and CPCS Principal/Pastor John Berry since 1994 and these Appellants and “Other Defendants” since 1994, even to create criminal acts of Karen Harrod Townsend and Ron Beck, Tim Jeffers “Gang” and “Others” on Townsend and his kids since unlawfully abducting Townsend from his kids since 10/20/1999, to “impede” Townsend/Berry’s Investigation since 1994, as for Grant and [other Elected and non Elected Politicians Jeffers and Lane and Others Unlawfully Paid with Townsend’s money] a Fraud to collect “political favors” and unjust enrichment” causing Extrinsic , Constructive, Intrinsic, and Collusion for “Fraud on the Court from “ineffective counsel” and “fraud, collusion, and arbitrariness” with Judges intentionally proved in constructive fraud against Townsend ET AL since 1987, therefore Canady disqualified: himself in the person now as the Supreme Court and as a 2DCA Judge having served in the underlying cases issues during the frauds of Gray to reveal all prior attorneys and judges frauds and Denny’s Firm frauds in 02-03812 Townsend v. Beck Case; the 13th Circuit; the 2nd DCA and Scruggs frauds in 01-15813 and 01-15814 and 02-4974 in collusion with prejudices judges also confessing criminal acts with Scruggs; the 5th DCA once ruling for Townsend in showing Judicial Fraud on the Court by Powell, Stroker, Strickland, and “others”; the entire Florida Supreme Court because of ruling in the underlying cases now proved acting in prejudice, fraud and at said earlier times allowing “Lanes Gangs”, “Beck, Jeffers, Grant’s, Gibbs, Denny’s, Scruggs and “others” Gangs frauds while the Supreme Court Judges had not lawfully taken their “Oaths”; and Judge Canady allowed a three judge panel to then dismiss the related case claiming “no jurisdiction” based on previous rulings, as a fault this Heather Gray was to honestly serve her clients writing an appeal covering all issues during her representation period of 3/14/2003, when she was immediately paid the full retainer she requested until her admitted abandonment about 8/2004, albeit the failure to do the promised services she made of 3/14/2003,

show abandonment of "honorable services even starting 3/14/2003, by her fraudulent inducement for her services she never intended to produce, how can Citizens not see this as constructive fraud of all "Government Persons" who block what is to be per our Florida Constitution Article I. Section 3, Jury issues, not Judge with "Government Persons" Collusion issues arbitrarily self empowering itself against Citizens Jury and innocent until proven guilty by a jury of ones peers rights as verses the unbiased ruling of the 7th Court of Appeals claiming basically if the Judge is Prejudice and in collusion then no Honorable Court or Day in Court ever existed and all prior Orders of said "Fraud on the Court Judges" is null and void?

IV. Whether the underlying criminal acts (Drug Use, Fraud(s), Extortion and Paying and expecting Kickbacks) by Charles E. Lane Jr. (a.k.a. Sabal Marketing Inc. and now Sealane Marketing Inc.) and the cover up of such "fraud, collusion and arbitrariness" by Townsend's Counsels "Chapin's/Popper/McCarthy's and "others" Gang" is not an ongoing continuance of the original criminal felony acts and frauds by Lane and his childhood friend as his attorney Charles E. Williams Jr.(Williams) and their "Gang" which the victims herein have never had "Due or Equal Process" due to the Mens Rea Concert of Acts of Counselors McCarthy, Popper, Bruce E. Chapin (Chapin), David Gibbs III (Gibbs), John Grant (Grant), Cary Gaylord, Charles Scruggs III (Scruggs), Heather M. Gray (Gray), Dickinson & Gibbons ET AL (Denny and Rolfes) and "Others" in the highest levels of State (Governors, Supreme Court, Florida Bar Officers, FDLE) and Federal Government (Bush, Martinez and "Others") who continue their "criminal enterprise" to never let Appellants have their Constitutional and Contract Rights as when one follows the money trial, Quid Pro Quo Acts and the "under color of law" political (MacKay's/McKay Plot with Bar Officers as Chapins Plot with State Attorney McCarthy and "Others") and "false light defamation" plot against Townsend as Townsend has "proved" truthfully advocated since 1987 and admitted by Defendants the Concert of Actions shows per the Robinson v. Weiland 5D05-2380 Ruling, the Mens Rea Criminal Minds and Constructive Extrinsic Fraud by "Fraud on the Court" even Appeals Courts first using P.C.A.'s to keep Appellants deprivated of all Defendants and "Others DOE" per the Robinson rule and Canady's Rulings not just "Fraud on the Courts" and Frauds on Appellants but Major Crimes and still in defiance to this Eleventh Circuit Court even ruling ENBANC.

ANSWER—Yes, Per the rule of Joint Liability, each Defendant and "others DOE" can liable based on the evidence presented to this 11th Circuit Courts finding as to these Defendants insubordinate acts in defiance of the "ineffective ruling" in 2008 and in support of these Appellants as victims the 11th Circuit Court has the authority to Order Contempt on Defendants and Grant relief and also return all issues to an impartial lower court judge to insure Appellants get all Discovery and then can lawfully submit the case to a jury and the finding of said Jury. Until full discovery is obtained and is presented, a jury then determines the fault and degree of damages to each.

V. Whether this trial Judge Elizabeth Kovachevich is as the other judges since Chief Ninth Circuit Judge Rom Powell now named as Defendants in this case is acting fraudulently and "under color of law" and by bias (As Admitted by Rulings of Florida Supreme Court Chief Judge Canady, 5th DCA) likewise abusing her discretion as to what is "Short and plain" to conceal her co-participants "Frauds on the Court" and crimes on Appellants verses "seeking justice" but instead continuing the "Free Will" Constructive Frauds, RICO Quid Pro Quo Plot of these Defendants and "others" and violating the Constitutional Rights of these Appellants as each claim of Appellants has been "impeded" from our "Due and Equal Process"[xxvi] contract(s) and Constitutional Rights to our children, our property, our Religious Contract Rights, Civil Rights, "Discovery" and a "Jury Trial" since 1987 "impeded" by "alias" "honest services providing" "Government Persons" continuing to conceal themselves and "Others" Concert of Actions.

Answer --- Yes. The Judge is required to recuse themselves in the event prejudice may be believed or alleged. The goal of a judge is to be impartial, apply our laws and contracts and seek justice.

VI. Whether Judge Elizabeth Kovachevich is proving by her rapid Dismissal from the dates on the docket even seeming to file the Dismissal before Townsend's deadline to file the Amended Complaint and wording of her Order she (as Appellants Allege because Townsend since 1987 refuses to: violate the law; fail to report violations of the law; and or take a bribe to conceal criminal actions of Lane and his co-participants, including Counsels, and Judges as this matter since 1987 is a "jury" issue) is continuing in defiance of this 11th Circuit Courts finding of "Ineffective Counsel" which specifically was advised to and advised to lower court Judge Martha Cook knowing Gray was being disbarred since 2009, and even during Grays appearances during 8/2009 through 1/2010 in Case 06-6005, had agreed not

to practice law since 8/2009 and also was in default as said by Judge Gomez in 2007, as now Judge Kovachevich with her Co-Participants as Judges of the 13th Circuit, 2nd DCA, 5th DCA, Florida Supreme Court and Middle District Tampa, intentionally continues the RICO, Anti-Trust, Extortion and Fraud Claims against Appellants by dismissing Appellants case prior to and or "impeding" Appellants "Discovery" as Judge Orfinger of the 5th DCA ruled 9/1/2006 as Judicial Error of Judge Powell's "Gang" since 1990's as those involved in this same case "impeding" the "Discovery" of personal and business records from Lane (a.k.a. Sabal, Sealane), Appellants Counsel(s), Government Persons, FBCCP/CPCS and "others" and even what by law is to be "Public Disclosure" that Appellants alleged and have at later times proved connect the Mens Rea motives of Defendants concealing their malfeasance to Townsend and those for whom he speaks and Defendants paying and taking bribes, payoffs, Quid Pro Quo rewards and co-participating in criminal acts leading to the violation of FBCCP Contract and Religious and Civil Rights from the actions and Defamation of FBCCP Registered Agent Senator John Grant allegedly to Townsend and these Non-Sect Appellants giving us truthful legal advice yet as exposed by his E-Mails to the Sheriff and State Attorney verse the Orfinger Ruling a fraud as Townsend is now proved right of all his claims, but Grants "ineffective Counsel" to the FBCCP non-sect members since 1994 is leading to and then resulting in the kidnapping of Townsend's children since 1999-now and deprivating Civil and Contract Rights of FBCCP/CPCS and these Religious Society Members as Tax Payers still assisting Lane ET AL, Jeffers ET AL and their Co-Participants and thus giving these victimized Plaintiffs/Defendants/Respondents/Plaintiffs/Appellants no relief or restitution and no other remedy at law from ongoing deprivations as is it obvious to say it is fact that Scruggs, Gray, Denny, intentionally was advised to "impede" Townsend and those for whom he speaks as the first client Gray seems to "abandon" which then led to her for the State Attorney's and Public Defenders office become the "Gray Hole" for many of their cases.

ANSWER---- YES.

VII. Whether these issues and "Government Persons" actions can be separated as only or solely Townsend issues or FBCCP issues or Citizens against Political Corruption Issues or must all causes be combined because these same Attorneys as now Defendants are as from 1987 the "ineffective counsel(s)" in a concert action "impeding" public production of documents

proving Appellants/Plaintiffs Quid Pro Quo Claims their Counselors and "others" becoming the "Government Persons serving and self dealing for their own interests" such as McCarthy and Gray as State Attorneys Office Members concealing Scruggs who himself is being in a conflict of interest being paid by the same QUID PRO QUO Government Agents his co-defendants from City, County and State Funds, "impeding" all Appellants to able to "impede"[xxvii] Townsend's claims, or Scruggs, Gray and Dickinson & Gibbons who if supporting Townsend's Claims must "bite the hands that feed them" via their co-participants, or County Officers with personal motives (Linda Chapin, Pat Bean) or Judges as Judges Powell, Stroker, Strickland, Perry, Orfinger and "others" as recused by the 2010-2011 Orders of Florida Supreme Court Chief Judge Canady including himself and Governors for their own agenda's even hiring or rewarding Quid Pro Quo Townsend's "Informed" Counselors (Gibbs since 1991, Ken Conner (Conner) since 1994, with Mel Martinez and "Others") and or Jeb Bush using his brother George W. Bush and Conner and Conner's former legal co-partner Mel Martinez also former Orange County Commission Chairperson, Director of HUD, U.S. Senator and now an executive with J.P. Morgan, to obtain "impeding" assistance of the Federal Agencies and FDLE Officers (Tunnell, Bailey) and Attorney's Generals (Butterworth, Crist, McCollum, Bondi) or Florida Bar Officers (Harkness, Berry, Board of Governors, Grievance Committee Members) or Federal Persons (Mel Martinez and Robert O'Neill) or Sheriffs (Rice, Coats, Gee, White, Grady Judd, Santa Rosa via Coats) concealing crimes they admit being done by their own deputies (Jeffers, Howlett, Smoak, Corbin, Santa Rosa County) as proved with "singularity", personal motives of bias and prejudice and reversal of their earlier rulings proving with their same goal of concealing these "ineffective counsels" and their co-participants plot of "never let Townsend have an Honest day in court or have a jury trial or get discovery to prove Lane is from 1987-now using money due to Townsend was participating in criminal acts of: drug abuse, extortion, bribery, kickbacks and multiple frauds leading to the deprivations of Townsend: being kidnapped from his children since 1999 by the now former wife, Karen Harrod Townsend and her maternal family of which her brother Steven is an employee of J.P. Morgan Companies at various times; non-production of Lane/Sabal, FBCCP, CPCS, SunBelt Records); loss of Townsend's incomes by torts (Lane, Popper, Chapin and "others"); thefts of FBCCP Designated Funds (via Jeffers and "others" since 1994); attempted murder; batteries; abuses of children; illegal drug uses; intentional infliction of emotional distress on children and the elderly and "others"; violations of Religious Contract

Rights per the FBCCP and CPCS By-Laws and Contracts (review of all documents, assembly, vote), Attorney/Client Contracts[xxviii], Civil and Constitutional Rights; and other various laws.

ANSWER----NO. All issues are related and a jury is per the law to determine liability and damages.

VIII. Whether this Court will stand by its 2008 Ruling of "Ineffective Counsel" and thus Order for Appellants our Demands for: All Records Production; Writs; Arrest Warrants on Defendants and "Others DOE" and Restoration of our Property, Civil Rights and a Jury Trial of all Issues judged as our Constitutions require by a "Jury" of our peers and as our FBCCP By-Laws requires since 1994, when "Government Persons" Deputies and Counsels are proved to violate "Free Will Baptist" Rule of Law and still do "fraud, collusion and arbitrariness[xxix]" still to Breach our Contracts, Unlawfully Invade our Privacy and Take our Property by fraud and threaten us with arrest if we use our First Amendment Rights of Speech and Assembly.

ANSWER---?

IX. Whether this Court will let stand the fraud and "Undue Process" of lower courts and other "Government Persons" in collusion using fraud for their self-dealing, unjust enrichment, invasion of privacy, unlawful search and seizure to conceal their crimes and other violations of Contracts, Rules of Civil Procedure and Civil and Criminal Laws knowing their superiors will rule Per Curium Affirmed (PCA) without explanation their legal basis of said rulings as now it is well proved in this case the "PCA" trickery was used for fraud of self-dealing "Government Persons", unconstitutionally deceiving citizens per the intent of the voters of Florida based on "Government Persons" deception in their interpretation to restructure the courts for a more streamline system however now however shown verses the use of Jenkins v. State or just simple "Dismissal" without legal "Due Process" to "impede" discovery of fraud for a Superior Court to aid and abet corruption of a lower court or "Government Persons" from whom they received Quid Pro Quo unjust enrichment.

ANSWER--- The Court should find that the use of a P.C.A. based on Jenkins v. State is illegal and unconstitutional and been used as a conspired fraud for extrinsic fraud on the Appellants these victims and for a

Fraud on the Honorable Courts these Appellants expected as Tax Payers to have and Trust from our "Government Persons".

Therefore this Honorable Eleventh Circuit Court of Appeals will direct each Defendant to produce the Townsend kids J.D.T and J.G.T to their father. Produce all records from each demand issued or to be issued per the demands of Townsend. That the U.S. Marshal arrest each Defendant named above herein for Obstruction of Justice and as an accessory to kidnapping an such other charges as seems just at this time and pending new discovery.

CONCLUSION

1. **Based on the above, reversal is required in all the Orders of Judge Kovachevich noted in the sequence of the "suspicious" Docket dated by the court as 20 July 2012 of the court included herein and as dated: "4 June 2012, Docket 3, Endorsed Order striking the original complaint"; "21 June 2012, Docket 5, Stricken Pursuant to 6 Endorsed Order Amended Complaint against Ronald. L Beck, Heather M. Gray (Attorney at Law)…" This Order unlawfully strikes the timely filed per the court order of 50 pages or less by 6/19/2012 Amended Complaint inferring that the Amended Complaint filed with the Clerk and other multiple copies were date stamped by the Clerk on June 19, 2012 at 2:55; "21 June 2012, Docket 4, Endorsed Order dismissing case for failure to prosecute pursuant to 3 Order directing plaintiff to file amended complaint. No timely amended complaint was filed." 25 June 2012, Document 6, Endorsed Order striking the complaint filed in this case as it does not in any way comply with the requirements and rules of this court. The plaintiff well knows this as his previous attempts to file such an outlandish complaint all resulted in dismissal of his case…" 9 July 2012, Docket 7, ENDORSED ORDER denying 7 Motion for recusal.; denying 8 Motion for reconsideration. Signed by Judge Elizabeth A. Kovachevich on 7/9/2012." Said Motions for recusal and Motion for reconsideration were directed not to Judge Kovachevich but to Chief Judge Conway allowing the Court to correct its own "judge" and arrant ways as to be in compliance with the Orders of this 11th Circuit Court of Appeals, Florida Supreme Court Chief Judge Canady and Florida 5th DCA Judge Orfinger per his ruling in this case of 9/1/2006, that until "full discovery" as Townsend demands from the courts through his counsels since paying**

McCarthy/Popper/Chapin/Gibbs/Grant/Scruggs/Gray/Dickinson & Gibbons and FBCCP paying "other" and Citizens paying "all law enforcers" to do is allowed for Plaintiffs/Defendants/Respondents now Again Plaintiffs as ongoing victims of Illegal Search and Seizure by Government Persons and "Others" being aided and abetted illegally by these Government Persons to unlawfully obtain these victims property of these Appellants no court can honorably discharge the claims made by Townsend since 1987 attempting to receive "Due and Equal Process" per the ruling of Federal Judge Moody Jr. on March 15, 2007 and per the Honorable Unbiased Counsel received in the early 1990's from now Federal Judge Gregory Presnell and "Others". These "ineffective counsel" and "others" were retained and paid for their "Honorable Services" based on their promise to render said services yet in their McCarthy, MacKay, McKay Plot Criminal Enterprise still "impede" Townsend reviewing Business Records of his Joint Venture with Lane ET AL or what per the By-Laws is to be the Public Records of FBCCP/CPCS or SunBelt or Kmart/Sears or even the medical records of the Townsend children J.D.T. and J.G.T. while under the medical care of Dr. Lon Lynn.

2. **Based on the above, reversal is required in all the Orders of the Court of Judge Merryday and Judge Wilson as noted in the Docket attached herein dated xxxxxx as both must recuse themselves based on their own knowledge of conflicts, bias, prejudice and unlawful acts per the 7th Circuit Court Townsend should now not have been required to raise as Merryday knew the patterns of the HCSO in the Aisenberg Case were related to the patterns herein by the same persons he concealed in the Aisenberg Case. It is not logical to put blame only on the detectives and not know their Superior Officers as Gary Terry and Gee knew the information was fabricated. In this case the John Grant E-mails prove these Defendants and "others Doe" knew the fabrication of information against Townsend was done since 1987 and thus a "sham" on the courts and citizens.**
3. **Based on the above, the Orders of Judge Powell in 1989-onward were "Null and Void" per the 7th Courts Rulings of Judicial Fraud on the Court and for Bias and therefore reversal of all deprivations flowing from Powell is required in all the Orders of: "Impeding" Discovery; or "Impeding" Justice; and "Dismissal Orders" of all the lower Courts as the Federal Middle District of Tampa, The Florida Supreme Court, The Florida Second DCA, The Florida Fifth DCA,**

The 13th Circuit Court, and the 9th Circuit Court especially of Judges Powell, Stroker, Abbot, Strickland and Perry and the 1989 rulings of Judge Muszynski from the 18th Circuit Ordering Lane a.k.a. Sabal and now Sealane should be upheld as the Rule of Law in this case as "impeding" Justice and Appellants Rights to "Due and Equal Process" cannot start until said records are produced for a fair trial by a jury on the merits.

4. **Each Officer of the Court and Officer of the Judicial Branch and Officer of the Executive Branch and Each officer of the Legislative Branch at the Federal and State Level per the 7th Court has a duty per their Oaths to: require Townsend and these Appellants to get "discovery" and a "fair trial" by a jury of our peers; issue disbarment proceedings against each "Lawyer and Judge" and their "others Doe Bar Members" in this case; seek and issue criminal charges against all Defendants and "others DOE" resulting from their intentional crimes in this case since 1987.**
5. **Townsend, as a Non-Lawyer and warned even actually threatened and extorted now all the years not to be a lawyer even by threats of Florida Bar Ethics Officers Chinaris and Boggs "Don't Get your law degree or within 6 months we will find a way to get your disbarred" and others now since Chapin with Powell and their "Gang" threatening if you do not let us know where you are getting your money and trying since January, 1993, to put Townsend in Jail, or in March 2010, Sheriff Gee per Senator Grant (Retired) claiming Townsend should be "Baker Acted" and is in need of evaluations sent his "Gee Gang" to extort and threaten Townsend as a victim for himself and these Appellants still now again comes and states to alleged "Alias Law Enforcers" "9-11, This is the report of a crime and many more crimes! Yes, my business partner was doing drugs and many acts of extortion, RICO and kickbacks and I still don't know who is with him in his "Gang"!" Did I contact the right Honest Service "Law Enforcers" this time? Or must this 11th Circuit Court recuse all their Judges if these Judges rule against these Townsend and those for whom he speaks as ruling against these Appellants will be in violation of Federal Laws affirmed by the 7th Circuit Court of Appeals as stated herein.**
6. **The United States Supreme Court has ruled a parent regarding their rights to their children does not have to be an attorney to even argue their right to their court so thus should not be the rules of lower courts or to alleged "law enforcers" being then double paid by our**

tax dollars or in the cases herein McCarthy, Chapins, Scruggs, Gray, Gibbs III, Grant and "Others" being paid directly and by tax dollars at the same time deceiving all the clients of their property by their collusion and fraudulent services.

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[i] Florida Bar v. Gray SC09-1121, as early as July 2009, Gray agreed not to practice law but Judge Cook ignored her plea bargain and that Gray since 2006, as confirmed by Judge Gomez she was in Default, yet Judge Cook, herself should have recused herself instead unlawfully dismissed the state case 06-6005.

[ii] The Finding of Federal Judge James Moody Jr. March 15, 2007, at a status hearing questioning Townsend with regarding what was believed at that time in the underlying cases. His ruling was, sounds like a violation of Due and Equal process to me. And then Judge Moody ruled for Townsend to replead the case and be more specific on each defendant.

[iii] "Impede" throughout this document is referred to from the U.S. and Florida Constitutions showing Rights that "No Law shall impede the obligation of a contract" yet these Persons under contracts have breached their Oath and Fiduciary Duties.

[iv] SMYRNA DEVELOPERS, INC. v. BORNSTEIN, 177 So2d 16 2nd DCA 1965 "…handling client's affairs with utmost degree of honesty" showing proof of "Fraud, Collusion and Arbitrariness" xxxxxxxxxx and per Umberger v. Johns 363 So2d 63, 1976, (The amended complaint alleged in substance that appellees, a faction of the Sans Souci Baptist Church of Jacksonville, colluded to adopt a resolution without adequate notice and which in effect deprived appellants of their active membership in the church, their right to vote on business affairs of the church, their right to hold elected positions of responsibility in the church and their right to continue to teach in the Sunday School and Training Union.) per Pinkerton v. West 353 So2d, 1977, 76-1882, 4th DCA. 1977, and Freel v. Fleming 489 So2d 1209, 1st DCA 1986, citing Florida Statues 95.11(4)(a) and Adams v. Sommers 475 So2d 279 (Fla. 5th DCA 1985) "Statue of Limitations begins with notice of ruling in his favor" and until the 2011 discovery by Townsend of the Orfinger Ruling in Robinson 2006 showing Powell ET AL was "illegal" and then the 2011 reversal of Orfinger "knowledge of collusion by McCarthy ET AL-Gibbs-Chapins-Powell ET AL could not be 1. Known by non lawyers or 2. Proved as Fraud, Collusion and Arbitrariness" and Singularity against Townsend and his other victims for whom he speaks as a matter of law and is a matter of fact per the law to be tried by a "Jury" not an "alias" Judge acting in violation of Florida Constitution Article I Section 3. McCarthy began and has since 1987 been in a position in violation of her Attorney/Client "Honest Services" as a member of the Florida Bar in collusion with her Co-Participants herein.

[v] 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…."

[vi] Per Thompson v. Martin 530 So2d 495 (Fla.Ap.3 Dist. 1989) 1. Attorney Client ¶105 Three elements of action for legal malpractice are the attorneys employment, his neglect of a reasonable duty, and proximate cause of loss to the client. …4. Complaint need only state facts sufficient to indicate that a cause of action exists, and need not anticipate affirmative defenses." Popper, Williams and Chapin Gang knew they could not control Judge Muszynski when learning of their torts supporting "Lanes Gang" but with the conspiracy with Chapins "Gang" they could since 1989 control Judge Powell and his "Gang" wanting to protect his boss Linda Chapin and her "Gang" as several cases prove corruption concealed by Defendants until the ruling of Judge Orfinger's 5th DCA Robinson Ruling 9/1/2006. The facts show Chapin's Gang did Quid Pro Quo in giving out bribes and taking bribes from Lane's "Gang" as Townsend believes Publix Executives not wanting to be discovered taking illegal kickbacks then applies Publix advertising dollars directed to assist Linda Chapin's and then Mel Martinez, Toni Jennings, Bush and "Others" Community Projects.

[vii] Illegal per Florida Law ABC Liquor Case of records production process.

[viii] Count I. Claim for Damages for Breach of Contract; II. Specific Performance. III. Damages for Interference with an advantageous business relationship. IV. Unjust Enrichment. V. Accounting for Certain monies owed.

[ix] Response and Counter Claim Filed July 5, 1988, Count I. Breach of Contract; Count II. Tort Interference with Contracts;

[x] Robinson v. Weiland, ET AL 5D05-2380 9/1/2006 Opinion relies on the rules of case law as "S.Bell Tel & Tel. Co. 483 So2d 487, 489 (Fla. 1st DCA 1986) ("[W]here the moving party's allegations raise a colorable entitlement to rule 1.540(b) (3) relief, a formal evidentiary hearing on the motion, as well as permissible discovery prior to the hearing, is required."); …Moreover, the courts have held that the hearing requirement applies when fraud is asserted as a grounds for relief under either rule 1.530 or 1.540, Florida Rules of Civil Procedure."

[xi] John Grant e-mails of November 30, 2009 and June 13, 2008, "…am therefore notifying the local law enforcement authorities so they may take appropriate action as they see fit…your are either obsessed with damaging the reputation of others, bankrupting the Citrus Park Baptist Church or a mental case who should be Baker Acted…by copy of this to Sheriff David Gee…the local authorities have you mentally evaluated." The e-mails of Grant intentionally contained several frauds which now in 9/1/2006, Judge Orfinger Confirmed Townsend was legally of sound mind and connects to Sheriff Gee as the Executive Officer of the court of Judge Crenshaw and her husband his deputy who on 9/7/2006, admit Townsend was a victim of "malicious prosecution" and Townsend alleges sound mind about the McCarthy/Popper/Chapin/McKay criminal enterprise and Crenshaw tries to conceal these facts with her bribe.

[xii] Scruggs is rewarded by the Florida Bar on February 16, 2006 receiving the Florida Bar President's Pro Bono Service Award for providing free legal services to the poor and for being an intake attorney for Bay Area Legal Services and being a mentor to the Volunteer Lawyers Program. Also for being a co-founder for D.W.I. a counseling group for rehabilitating individuals convicted of drunk driving. Scruggs also per www.tampagov.net Scruggs serves on the City Of Tampa Ethics Commission with Carolyn Bricklemyer and reports this information to Tampa Mayor Pam Iorio. Scruggs was appointed to the commission by Chief Circuit Judge Menendez upon the retirement of Fred Karl. Scruggs was appointed to finish the term of Fred Karl through July 2008 and then to his own four year term to expire on July 2012. The Commissions Report even includes a letter to Mayor Pam Iorio from Linda Sau-Sena Tampa City Council District 3 At-Large in response to the inquiry questioning RE: Board Members and Conflicts of Interest as of all lawyers, Scruggs had many conflicts of interest and what should have been a concern based on this 11th Circuit Courts ruling of "Ineffective Counsel" thus affecting City Ethics Code2-515 and 2-516 of the City Ethics Code having incorporated 112.313(3) and 112.313(7) Florida Statues of the State Ethics Code. While in question Scruggs may not have directly billed the City for his services, Scruggs directly billed Hillsborough County Programs and was a benefactor from State Programs and "other" Quid Pro Quo compensation. Additionally, Defendant Governor Charles Crist per www.floridabar.org reports July 10, 2007, The Florida Supreme Court Judicial Nominating Commission received a total of 34 applications for consideration for five newly created Offices of Criminal Conflict and Civil Regional Counsel established by Senate Bill 1088 in 2007. A Regional Counsel will be appointed by Governor Crist for each of the five District Courts of Appeal. Lawsuits include Board of County Commissioners v. Scruggs 545 So2d 910, 1989 requiring and defining "adequate counsel".

[xiii] Marva Crenshaw in 2006, Florida Supreme Court Chief Judge Canady in 2011, 5th DCA Orfinger ET AL in 2006 as these actions were combined in this continuing cause Heather Gray was paid to litigate.

[xiv] Jurisdiction in Tampa, Hillsborough County is based on "F.S.§910.14… Kidnapping s.787.01 or s.787.02 may be tried in any county in which his victim has been taken or confined during the course of the offense" and per "F.S.§910.13 Accessory after the fact…to a felony may also be tried in any county in which the principal in the first degree might be tried".

[xv] The Complaint Counts are as Follows:

[xvi] Townsend v. Beck ET AL

[xvii] 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/omissions necessary for the crime's completion."

[xviii]

ii Townsend v. Beck 02-03812 and Townsend v. Townsend 02-4974 Divorce Case resulting from the Concert of Actions of the estrange wife Karen Harrod Townsend acting in collusion with her employers

Ron Beck, Herman Meister, Karen Jeffers, Tim Jeffers, Paula Powell, Gary Leatherman, Joe Howlett, David Gibbs, John Grant and "others Doe" and some now named as Defendants in this suit to in their Concert of Actions "impede" Randall Townsend from performing his "officer" duties(per Umberger v. Johns issues) per the membership to investigate and report 1. Misuse and "self dealings" since mid 1994, of Designated FBCCP and CPCS Funds as allocated to be spent per the adopted Budget(s) as voted for each year and quarterly by the members of the FBCCP Religious Society Congregation; 2. Fraudulent Purchase of 40+ Acres of Property located at 18105 N. Gunn Highway (Earle Property) by the "Pastors Sect" by fraud to the members in 1997, Townsend clearly opposed "Sect" frauds; 3. Child Endangerment(s) and Frauds; 4. Legal Malpractice by the FBCCP Corporation Registered Agent John Grant Jr. and other Lawyers including David Gibbs III and Cary Gaylord failing to provide "Honest Services" to the Membership and the Corporation as but only performing their services to the "Pastors Sect" which is now proved by "partial" records discovery revealed many years later who were secretly falsifying FBCCP Business Meeting Records and paying out members funds as bribes to benefit only the "Sect" to the detriment of the Plaintiffs herein.

[xxi] Townsend ET AL v. Scruggs ET AL confessed to Judge Stoddard "fear of Deputies ET AL"

[xxii] Jenkins v. State 385 So2d 1356 (Fla. 1980) alleging a PCA ruling without an opinion limited the Jurisdiction of the Higher Court. The courts alleged that the March 11, 1980 vote by the citizens 940,420 to 460,266 (67%) to restructure the courts limited the duties of the Florida Supreme Court per Florida Constitution Article V, 3(b)(3).

[xxiii] Letter of J.D.T and J.G.T 10/1999

[xxiv] 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.**

[xxv] Florida Bar v. Gray SC09-1121, as early as July 2009, Gray agreed not to practice law but Judge Cook ignored her plea bargain and that Gray since 2006, as confirmed by Judge Gomez she was in Default, yet Judge Cook, herself should have recused herself instead unlawfully dismissed the state case 06-6005.

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[xxviii] SMYRNA DEVELOPERS, INC. v. BORNSTEIN, 177 So2d 16 2nd DCA 1965 "…handling client's affairs with utmost degree of honesty" showing proof of "Fraud, Collusion and Arbitrariness" xxxxxxxxxx and per Umberger v. Johns 363 So2d 63, 1976, (The amended complaint alleged in substance that appellees, a faction of the Sans Souci Baptist Church of Jacksonville, colluded to adopt a resolution without adequate notice and which in effect deprived appellants of their active membership in the church, their right to vote on business affairs of the church, their right to hold elected positions of responsibility in the church and their right to continue to teach in the Sunday School and Training Union.) per Pinkerton v. West 353

So2d, 1977, 76-1882, 4th DCA. 1977, and Freel v. Fleming 489 So2d 1209, 1st DCA 1986, citing Florida Statues 95.11(4)(a) and Adams v. Sommers 475 So2d 279 (Fla. 5th DCA 1985) "Statue of Limitations begins with notice of ruling in his favor" and until the 2011 discovery by Townsend of the Orfinger Ruling in Robinson 2006 showing Powell ET AL was "illegal" and then the 2011 reversal of Orfinger "knowledge of collusion by McCarthy ET AL-Gibbs-Chapins-Powell ET AL could not be 1. Known by non lawyers or 2. Proved as Fraud, Collusion and Arbitrariness" and Singularity against Townsend and his other victims for whom he speaks as a matter of law and is a matter of fact per the law to be tried by a "Jury" not an "alias" Judge acting in violation of Florida Constitution Article I Section 3. McCarthy began and has since 1987 been in a position in violation of her Attorney/Client "Honest Services" as a member of the Florida Bar in collusion with her Co-Participants herein.

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