

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

CASE NO: 02-03812

RANDALL TOWNSEND,  
PLAINTIFF,

v.

RONALD L. BECK, (a.k.a Ron Beck) INDIVIDUALLY, REVERAND RONALD L. BECK, AS SENIOR PASTOR, OF FIRST BAPTIST CHURCH OF CITRUS PARK, (Hereinafter as FBCCP) WILLIAM T. BROWN, (a.k.a Bill Brown), INDIVIDUALLY, REVERAND WILLIAM T. BROWN, OF FBCCP AS PASTOR OF EDUCATION AND ADMINISTRATION; HERMAN MEISTER, INDIVIDUALLY, REVERAND HERMAN MEISTER, AS PASTOR OF SCHOOL MINISTRIES, OF FBCCP; GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE AND MEMBER OF FINANCE COMMITTEE AND MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER, MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP; MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMANTE, AS CHAIRMAN OF DEACONS, 2000-2001. OF FBCCP; JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE, OF FBCCP; GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS CORPORATION PRESIDENT, AS TRUSTEE, AS DEACON OF FBCCP; DR. LON LYNN, INDIVIDUALLY, DR. LON LYNN, AS A PROFESSIONAL MEDICAL DOCTOR, THE MEMBERS OF THE CORPORATION d/b/a,

FIRST BAPTIST CHURCH OF CITRUS PARK, CITRUS PARK CHRISTIAN SCHOOL, A MINISTRY OF FBCCP,  
AS DEFENDANTS,

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**SECOND AMENDED CIVIL ACTION FOR DAMAGES  
COMPLAINT AND DEMAND FOR JURY TRIAL**

COMES NOW, RANDALL TOWNSEND, PRO SE, and sues

RONALD L. BECK, INDIVIDUALLY; REVERAND RONALD L. BECK, AS SENIOR PASTOR OF THE FIRST BAPTIST CHURCH OF CITRUS PARK; (HEREINAFTER AS FBCCP); WILLIAM T. BROWN, INDIVIDUALLY; REVERAND WILLIAM T. BROWN, AS PASTOR OF ADMINISTRATION, FBCCP; HERMAN MEISTER, INDIVIDUALLY; REVERAND HERMAN MEISTER, AS

PASTOR OF SCHOOL MINISTRIES, FBCCP; GARY LEATHERMAN, INDIVIDUALLY; GARY LEATHERMAN, AS TRUSTEE, AND DEACON AND MEMBER OF PERSONNEL COMMITTEE OF FBCCP; ROBERT GILES, INDIVIDUALLY; ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, AND DEACON, FBCCP; TIM JEFFERS, INDIVIDUALLY; TIM JEFFERS, AS FINANCE COMMITTEE MEMBER; MARK NUNES, INDIVIDUALLY; MARK NUNES, AS CHAIRMAN OF FBCCP DEACONS, 1999-2000; MIKE SHUMATE, INDIVIDUALLY; MIKE SHUMANTE, AS CHAIRMAN OF FBCCP DEACONS, 2000-; JOE HOWLETT, INDIVIDUALLY; JOE HOWLETT, AS FBCCP TRUSTEE; GEOFF SMITH, INDIVIDUALLY; GEOFF SMITH, AS FBCCP CORPORATION PRESIDENT AND TRUSTEE AND DEACON; DR. LON LYNN, INDIVIDUALLY; DR. LON LYNN, AS DR LON LYNN M.D.; THE MEMBERS OF THE CORPORATION d/b/a FIRST BAPTIST CHURCH OF CITRUS PARK, A FLORIDA CORPORATION; AND CITRUS PARK CHRISTIAN SCHOOL, AS A MINISTRY OF FIRST BAPTIST CHURCH OF CITRUS PARK and alleges:

**GENERAL ALLEGATIONS**

1. This is an action for damages in excess of \$25,000.00.
2. At times material herein, Plaintiff resides in Hillsborough County, Florida.
3. Defendants, reside principally in Hillsborough County, Florida and d/b/a FBCCP in Hillsborough, County, Florida.
- 4.-5. STRIKE
6. THESE MEMBERS AT LARGE OF THE CORPORATION THEN WHO THEN VIOLATED KEEPING TO THEIR FIDUCIARY DUTIES TO

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

LEAVE OUR CHURCH ALONE.” MR. BECK LATER CONTINUES, “—VOLUNTARILY REMOVING HIS MEMBERSHIP FROM OUR CHURCH. AND AFTER THAT LETTER—BY THE WAY , IN THE LETTER HE SAYS THIS ACTION I PRAY WILL BRING CLOSURE TO OUR CURRENT DISPUTE AND PROTECT MY WIFE, CHILDREN AND CHURCH BODY FROM ANY FURTHER ACTION ON THIS MATTER.”

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

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

8.--10. STRIKE

11. Plaintiff also had duty as described above and herein and was asked by others to investigate and to report other acts of Negligence and Frauds and Conspiracy and Conspiracy to Defraud when Pastors and Pastors with Finance Committee members and trustees sought to defraud the Membership, Government Agencies and individuals, including Plaintiff’s wife and minor children and Parents and even now the Courts when Defendants continue to try to allege Plaintiff is a “Liar”, “Sower of Discord”, “Dangerous” due to a “Stress related breakdown” and a “Stalker” or a “VIOLENT MAN. All accusations are pure frauds by Defendants to cover up their illegal conduct and violations of the BY-LAWS in an effort to allow Defendants to conceal their frauds to the membership and to the courts and government agencies including the false reports to the sheriff’s department..

12. .-26 STRIKE

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

28. -29 STRIKE

30. {REMAIN BUT EXTRACT INDIVIDUALS}

Thus upon knowledge of said acts of the FBCCP PASTOR[S], acting Individually, and acting as Officer[s] of the FBCCP, these Defendants as officers and defendants as MEMBERS AT LARGE, acting individually, and **acting as the Membership AT LARGE of the Corporation of FBCCP had an individual FIDUCIARY and a CONTRACTUAL DUTY created by the Contract language of the FBCCP “BY-LAWS” to constrain** themselves and Ronald L.

Beck, individual, [William Brown III, individual, Herman Meister, individual,] and

as Pastors and Trustees of the Corporation and **the Leadership of the Deacons and the Finance and Personnel Committees [including Gary Leatherman, individual, Joe Howlett, individual, Tim Jeffers, individual, Robert Giles, individual, Dr. Lon Lynn, individual, Geoff Smith, individual and Carl**

**(Buddy) Rawls, individual ]and all other members and prevent these actions**

from Still causing and inflicting intentional harm, with malice upon Plaintiff and

Plaintiff's family as Defendant Ronald L. Beck and [William Brown III and

Herman Meister, and Gary Leatherman, individually, Joe Howlett, individually,

and Tim Jeffers, individually, Robert Giles, individually and as Officers of the

Corporation and others conspired to cover up the acts Plaintiff tries to report acts

which violated the Florida Statues and FBCCP Policies and Procedures as stated

in **FBCCP "BY-LAWS"** and Citrus Park Christian School Handbook and

Plaintiff is still being violated by the FALSE ACCUSATIONS CREATED by

these PASTORS AND LEADERSHIP AND OTHERS as they still try to discredit

and harm the integrity of Plaintiff as Plaintiff tries to still expose their ongoing

un-civil acts and violations of law and violations of Plaintiff's CIVIL RIGHTS

AS THESE DEFENDANT CONTINUE TO PRACTICE HATE CRIMES AND

VIOLATE THE UNITED STATES OF AMERICA CONSTITUTION AND OF

THE CONSTITUTION OF THE STATE OF FLORIDA AS THEY PRACTICE

THESE HATE CRIMES KEEPING PLAINTIFF FROM HIS CHILDREN BY

THEIR FRAUDS AND LIES AND AS THEY VIOLATE THE

CONSTITUTIONS THAT CLEARLY STATE THEY CANNOT USE OR HIDE

BEHIND LAWS THAT TRY TO PROTECT THEM BECAUSE THE  
CONSTITUTIONS CLEARLY STATE “NO LAWS SHALL IMPEDE THE  
OBLIGATION OF A CONTRACT” AND THESE DEFENDANTS WERE  
OBLIGATED TO THIS PLAINTIFF TO NOT SLANDER HIS GOOD NAME  
AND HARM HIS FAMILY BY THEIR ACTIONS AS THEY ASSISTED THE  
SENIOR PASTOR AND HIS STAFF OF PASTORS AND FINANCE  
COMMITTEE AND TRUSTEES TO VIOLATE THE RIGHTS OF THIS  
PLAINTIFF BY FRAUDS.

31. In COERSION, claiming superior exclusive knowledge he gained from his  
hired experts Ronald L. Beck, using only the manipulated tainted information he  
wanted to reveal to the investigators in order to get their findings to reinforce him,  
inspired his wife, April Beck, and daughters Julianna Beck, Darla Beck, and  
other pastors William Brown, III, Herman Meister, and other members of  
FBCCP, Tim Jeffers, Karen Jeffers, Mike Shumate, Joe Howlett, Jackie Howlett,  
Robert Giles, and Gary Leatherman, Geoff Smith, Jim Bates, Carl W. (Buddy)  
Rawls, John Michael Corbin, Joe Kieras, Jim Leahy, Paula Powell, Tammy  
Nunes, Mark Nunes, Craig Tucker, Dr. Lon Lynn, Gayle Lynn, Shawn Hopkins,  
Jerry Miller and others, as individuals and collectively AS MEMBERS AT  
LARGE AS THE FBCCP CORPORATION did and continue jointly  
and independently conspire to tamper with “fact finding” and “cover up” of  
evidence and “tamper with and intimidate witnesses” in order to Obstruct Justice  
and continue frauds and create Frauds against Plaintiff in order to discredit the  
facts Plaintiff was trying to expose per Plaintiff’s DUTIES to the Corporation per



the **FBCCP BY-LAWS, CONSTITUTION, POLICIES and FLORIDA STATUES** and these individuals continue to harass Plaintiff and Plaintiffs family and continue to ruin and try to ruin Plaintiff's integrity and Plaintiff's relationships with Plaintiff's family and friends despite the revelations in the Land Use Hearings regarding Petition File Number SU 00-1203-KE and appeal number 01-1023 and the Circuit Court Case Number 01CA8320, as Gills Et al. V Hillsborough County and the findings thereof confirming the positions Plaintiff as CHAIRMAN OF THE LONG RANGE PLANNING COMMITTEE, tried to warn of and advise of to the Corporation however Ron Beck named Plaintiff as a "liar" and "a controller" and "worrier" **and "potentially violent due to a stress related breakdown"** to the points that this became **THE DISTRACTION BECK AND THE PASTORS AND FINANCE COMMITTEE AND TRUSTEES NEEDED TO REMOVE THE INVESTIGATION OF THEIR ACTS** and as planned **TO GET THE DESIRED CONSEQUENCES OF KEEPING PLAINTIFF QUIET ABOUT THE VIOLATIONS BY THESE DEFENDANTS BY BECK AND MEISTER AND BROWN AND LEATHERMAN AND HOWLETT AND JEFFERS AND NUNES AND RAWLS AND DR. LYNN** this **threatened the Security anyone including Plaintiff's family might have from trusting any advice that Plaintiff might provide for stating these warnings and findings IN THESE ATTACHMENTS HEREIN AND NOW ALSO** Confirmed by the legal process. Plaintiff alleges that there are patterns as examples that show Ron Beck when he does not get what he wants will use deceptive practices and destruction of the opponents integrity in order to

manipulate his partly naïve subordinates to the point that if they do not agree with him he will turn on them and degrade them as well, not allowing them to defend themselves from his attacks and these members knowingly allow these acts.

32. {BECK & CORP STAY struck individuals then changed mind—read transcript to clarify}  
In coercion, Ron Beck and his pastors claiming in their pastoral roles to have superior knowledge **instigated marriage problems in Plaintiff's marriage** while they allegedly were trying to help and then used this created deceptions in order to discredit Plaintiff from being of a moral standard to be in leadership or a competent father or husband when BECK, MEISTER, BROWN AND LEATHERMAN AND GILES ON SEPTEMBER 8, 1999, BY FRAUDS removed Plaintiff from leadership so Plaintiff could not continue to prove out the deceptions about the money trail and the building scheme and theft of the children's microphone and other frauds and acts of criminal negligence of Ron Beck and the pastors, that Plaintiff became aware of as in Plaintiff's roles of leadership as per POINT (12) herein and is trying to reveal to the membership by Plaintiff doing his duty to the CORPORATION to reveal the frauds by the Pastors.

33. {STRIKE ALL}33-43.

44. DEFENDANTS MEMBERS AT LARGE WERE NOTIFIED BY MULTIPLE LETTERS AND EVEN THE MINUTES FROM THE CORPORATION BUSINESS MEETINGS OF THE FRAUDS BY THE CORPORATION OFFICERS AND ARE, BY THE GIL'S LAWSUIT AND THIS LAWSUIT, BEING INFORMED OF THE BETRAYAL OF THE

INVESTIGATION OF THE CORPORATE OFFICERS FINANCIAL REPORTING AND FRAUD BY DEFENDANT GARY LEATHERMAN TO THIS PLAINTIFF AND TO THE CORPORATION YET DEFENDANTS AS MEMBERS AT LARGE STILL PRACTICED MULTIPLE HATE CRIMES OF EXTORTION AGAINST THIS PLAINTIFF INCLUDING TELLING PLAINTIFF TO LEAVE PUBLIC STREETS OR PUBLIC PROPERTY AS PLAINTIFF TRIED TO REACH TO HIS KIDS AS A CONCERNED PARENT AND INCLUDING ALLOWING THE FILING BY DEFENDANT BECK OF THE CHARGES OF AS A “STALKER” WHEN PLAINTIFF HAD NEVER BEEN LEGALLY DEPRIVED OF HIS CONSTITUTIONAL PARENT RIGHTS THESE MEMBERS AT LARGE PUT THEMSELVES ABOVE THE LAW AND PRACTICED HATE CRIMES AGAINST THIS PLAINTIFF INCLUDING ATTEMPTED FALSE CHARGES TO LAW ENFORCEMENT OFFICERS IN ORDER TO HAVE PLAINTIFF ARRESTED AND THESE ACTS DID CAUSE PLAINTIFF TO BE HARRASSED BY A SHERIFF DEPUTY ON MULTIPLE OCASSIONS WHEN PLAINTIFF WAS INVESTIGATED ON THESE ALLEGED AND FALSE CHARGES REPEATEDLY CREATED BY VARIOUS MEMBERS AT LARGE AS THEY WILLINGLY PARTICIPATED IN THE CONSPIRACY TO KEEP PLAINTIFF FROM BEING FOUND TRUTHFUL AS THE CHAIRMAN OF THE LONG RANGE PLANNING COMMITTEE DUTIES REQUIRED PLAINTIFF TELLING THE TRUTH NOW BEING REVEALED IN THIS LAWSUIT AS PLAINTIFF WAS FOUND TO BE TRUTHFUL IN THE CASE BEFORE

JUDGE ARNOLD IN GIL'S V. HILLSBOROUGH COUNTY STOPPED THE CORPORATION FROM BUILDING ON THE NEW PROPERTY AS PLAINTIFF ADVISED THE MEMBERSHIP AT LARGE AND THIS MEMBERSHIP AT LARGE ACTED WILLFULLY TO TAMPER AND MAKE FALSE ACCUSTIONS AGAINST THIS PLAINTIFF BECAUSE THIS PLAINTIFF WAS OBEYING THE LAWS THIS MEMBERSHIP AT LARGE WAS TRYING TO VIOLATE BUT NOW STOPPED BY THE COURT RULING OF JUDGE ARNOLD.

45. {REMAIN BUT STRIKE INDIVIDUALS }

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

46. {STRIKE}46-49.

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

51. {STRIKE}

52. Defendant Ron Beck speaking as the moderator of the meeting and as a Senior Pastor and as a member of the Committee answered: "Pastor Beck- Brother Joe, as chair, can I recommend that and pass that recommendation to our Chairman of

the Finance Committee and have him dig into that and find and get information for you.

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

{STRIKE 54-57}

58. {REMAIN BUT STRIKE NON PARTY}

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

59-61. {STRIKE 59-61}

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

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

**COUNT VI**  
**MALICIOUS PROSECUTION**

71. Plaintiff, Randall Townsend, Pro Se, sues the Defendant, RONALD L. BECK, individually, and in his Official capacity as REVERAND RONALD L. BECK, SENIOR PASTOR OF FBCCP, and sues DEFENDANTS AS MEMBERS AT LARGE OF FBCCP AS NOTED HERIN AND OTHER TO BE NAMED AS DISCOVERY IS JUST STARTING AND WILL CONTINUE IN capacities as stated above herein in the Corporation known as First Baptist Church of Citrus Park and Plaintiff sues THE CORPORATION KNOW AS First Baptist Church Of Citrus Park.

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

73. Plaintiff is a citizen and resident of Hillsborough County, at all times material hereto, and resides in Hillsborough County. These Defendants all reside in the State of Florida and held positions of Officers of Defendant First Baptist Church of Citrus Park. Defendant First Baptist Church of Citrus Park is a Florida

Corporation, duly licensed and organized under the laws of Florida, whose main office and doing business at 7705 Gunn Highway, Tampa Florida.

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

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

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

77. On November 2, 2001, when the Complaint referred to in the paragraph above was filed, the Defendant RONALD L. BECK individually, and in his capacity as SENIOR PASTOR OF THE CORPORATION OF FBCCP AND DEFENDANTS AT LARGE OF THE FBCCP AS THEY AGREED TO SUPPORT

DEFENDANT BECK IN HIS ACTION AS INDIVIDUAL AND SPOKE FOR THEIR CAUSE INTENTIONALLY CREATED herein knew that the allegations contained in the Complaint were false and untrue; that the action was brought without probable cause; and further, that the action was instituted and prosecuted with malice and without any reasonable probability of success. Furthermore, the actions by Defendant was an attempt to fraud the Court with granting a “Stalking Order” so to bar Plaintiff from investigation process and exposing facts to other FBCCP Corporation members and to the other churches and to the general public that exposed the Deceptions by Defendant Ron Beck individual and other Church officers and their own personal attacks against this plaintiff and his family acted against as hate crimes. **Defendant Ron Beck in the Complaint did write two fraudulent facts to the Judge to induce a “TEMPORARY INJUNCTION FOR PROTECTION AGAINST REPEAT VIOLENCE” case file # 01-15183, Hillsborough County, Florida.** However, notwithstanding these facts, the Defendant signed this Complaint and caused it to be filed with the Clerk of this Court and served on this Plaintiff in this present action. These acts were performed by the Defendants with the intent to injure the Plaintiff, and to bring his good name into public disgrace and disrepute, and with the further intent to with the “Stalking Order” prevent Plaintiff from coming to the FBCCP Corporation and exposing to the members the frauds and deceptions of Ron Beck, Defendant and the others named above herein and continue his frauds to Plaintiff’s wife that Plaintiff was “dangerous”, that the action was filed with the specific and malicious intent on the part of the Defendant **to coerce the Court**



**with fraud** from his testimony and from witnesses Ron Beck tried to call who intended based on subsequent testimony intended to give false information to the Honorable Judge Palomino to induce him to grant a “stalking order” and to further keep Plaintiff from speaking to the FBCCP Corporation where Plaintiff was a member in good standing and holding the offices as in POINT (12) above herein until the Fraudulent statements and Fraudulent actions were started by this Defendant when Plaintiff was attempting to report to the Members the false business statements and other misrepresentations by Reverend Ron Beck and others herein. NOTICE of the issues of his improper actions are contained above herein and incorporated herein this count.

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

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

80. Moreover, the Defendants here is unable to establish that the original proceeding was instituted and prosecuted on the good faith reliance of legal counsel; or, that the proceeding was instituted pursuant to an independent

investigation by a responsible attorney of law, licensed to practice in the state; or that the Defendant is or represents, or is and agent of, a public entity or state agency that is immune from liability for causes of action in tort.

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

82. By reason of both the false Complaint executed and filed with malice, and attempted extortion and frauds, and a direct intent to injure the Plaintiff as noted above, the Plaintiff's reputation to his family and in the community where he lives and worked and served in many civic functions has been irretrievably damaged, and the Plaintiff has been humiliated, frightened by his coercion with Sheriff Deputies on multiple occasions including the April 27, 2000, Deacons meeting where defendants Beck, Leatherman and Howlett alleged Plaintiff was a violent man and a liar, shamed, and intimidated, and again in July 2001, and by multiple traffic stops by Deputy Joe Howlett when Plaintiff was not in violation of any laws and followed on two occasions and abused even at toll booths and at the public mall and at the public post office and restaurants and has suffered great duress in watching William Brown multiple times put at risk the health of many minor children and in July, 1999, violate by an immoral act upon Plaintiff's now former wife, yet Plaintiff was called the liar for reporting such act and Plaintiff has suffered great mental pain thereby as Plaintiff was forced now for many years

to watch the pain and suffering these officers and members at large as Doctor Lynn and these Sheriff Deputies Howlett and Jeffers professional actions were allegedly a cover for their own criminal acts as these conspirators do daily to destroy this family and the lives of these people and this plaintiff as they still conspire to put more people at risk who do not follow the wishes of Ron Beck and his pastors. PLAINTIFF BECAUSE OF THE LIES STARTED BY RON BECK HAS NOW NOT BEEN ABLE TO SEE OR SPEAK TO HIS KIDS SINCE LATE 2002, BECAUSE OF THE LIE THAT PLAINTIFF IS VIOLENT AS THE ACTION FILED BY RONALD L. BECK FOR HIMSELF AND THE CHURCH WAS USED EVEN OUT OF CONTEXT BY ATTORNEY FOR THE WIFE IN THE DIVORCE CASE TO JUDGE TIMMERMAN WHO RATHER THAT SHOW PROPER JUDICIAL PROCESS INSTEAD TOOK THE LIES OF STACEY TURMEL AND DID USE HER POSITIONS ON THE BECK ACTIONS AS A WAY TO ALL THE MORE HARM AND DAMAGE THIS PLAINTIFF/HUSBAND/FATHER.

Moreover, the expense of defending against the lawsuit, both in this Court and in the District Court of Appeal, has been incurred on behalf of this Plaintiff, and the health of this Plaintiff and of the Plaintiff's spouse, children and parents and family and others has been damaged and the future expenses of trying to repair the mental duress by professional counselors that will be needed to restore this families relationships destroyed by the years of frauds by these alleged pastors.

83. WHEREFORE, Plaintiff demands trial by jury on all issues so triable and prays this Court will award damages against Defendants, Ronald L. Beck,

individually, Rev. Ronald L. Beck as senior pastor of First Baptist Church of Citrus Park, First Baptist Church of Citrus Park, Inc., including court costs and any other and further relief as the Court may deem proper.

Respectfully submitted,

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Randall C. Townsend, Pro Se  
P.O. Box 21,  
Odessa, Fl. 33556  
941 350 2677

Certificate of Service

I hereby certify that a copy of the foregoing was provided by U.S. Mail this \_\_\_\_\_, day of \_\_\_\_\_, 2006, to Defendants via their attorney DICKINSON & GIBBONS, P.A. ATTORNEYS AT LAW, 401 North Cattleman Road, Suite 300, SARASOTA, FLORIDA 34232.

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Randall C. Townsend