

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

RANDALL TOWNSEND,
PLAINTIFF,

CASE NO. __02-03812__

v.

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

PLAINTIFF'S MOTION—
FOR DISCOVERY TO JANSSEN & HORGAN, C.P.A

Plaintiff, Randall Townsend, Pro Se, moves the production of all documents, applications for loans, applications of employment, letters, electronic messages and or any type of correspondence regarding the following parties pending in these lawsuits as shown above and herein as a letter of October 27, 1999, shows the Finance Committee of the First Baptist Church of which Ron Beck as Pastor is a member of said Committee and in Corporation Business Reports shows Ron Beck relied on and voiced input from these reports to the General Voting Members who employ Ron Beck.

Further, Plaintiff states that the required discovery will lead to additional facts necessary for Plaintiff to present all facts to the Court of Appeals in this case and in the pending Federal case as sited below:

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

RANDALL TOWNSEND,)
Individual,)
AND AS “NEXT FRIEND” AND)
PATERNAL PARENT OF MINOR)
SON, J.D.T.)
AND AS “NEXT FRIEND” AND)
PATERNAL PARENT OF MINOR)
DAUGHTER, J.G.T)
AND AS A DIRECT MEMBER)
OF THE FIRST BAPTIST)
CHURCH OF CITRUS PARK AND)
AS “NEXT FRIEND” OF)
ALL MINOR CHILDREN)
OF THE CORPORATION)
KNOWN AS FIRST BAPTIST)
CHURCH OF CITRUS PARK)
AND CITRUS PARK CHRISTIAN)
SCHOOL, INC.)
Plaintiffs)
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),)
ET. AL. AND As per all as)
DEFENDANTS Listed Below herein,

CASE NO: _8:06-CV2050T-30-TGW

JURY TRIAL DEMANDED

REQUEST FOR INJUNCTIONS IN

COUNTS—III and XXX and XXI.

AND A WRIT OF PROHIBITION

IN COUNT ---XVI.

AS FOR CASES CONSOLIDATED AND REMOVED FROM EITHER:
**IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT,**

AND

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

CIRCUIT CASE NO: 02-03812

**RANDALL TOWNSEND,
Individual,
AND AS “NEXT FRIEND” AND
PATERNAL PARENT OF MINOR SON, J.D.T.
AND AS “NEXT FRIEND” AND**

DIVISION: K

PATERNAL PARENT OF MINOR DAUGHTER, J.G.T

Plaintiffs, or as Appellants

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(1997-2005) AND
GARY LEATHERMAN AS MEMBER OF FINANCE COMMITTEE OF FBCCP AND
GARY LEATHERMAN AS 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 OF FBCCP
TIM JEFFERS, AS FBCCP DEACON
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,(1995-present) OF FBCCP;
GEOFF SMITH, INDIVIDUALLY,
GEOFF SMITH, AS CORPORATION PRESIDENT, AS TRUSTEE (at all times),
GEOFF SMITH AS DEACON OF FBCCP;
DR. LON LYNN, INDIVIDUALLY,
DR. LON LYNN, AS A PROFESSIONAL MEDICAL DOCTOR,
THE SELECT MEMBERS OF THE CORPORATION d/b/a,
FIRST BAPTIST CHURCH OF CITRUS PARK, and CITRUS PARK
CHRISTIAN SCHOOL, (“CPCS”), A MINISTRY OF FBCCP,
CITRUS PARK CHRISTIAN SCHOOL, A MINISTRY OF FBCCP

INDEPENDENT ACTION COMPLAINT PER Fla. R. Civ. P. 1.540

DEFENDANTS

CHARLES H. SCRUGGS III.,
Individually,
CHARLES H. SCRUGGS, III. ESQUIRE,
As attorney at law
CHARLES H. SCRUGGS, III, P.A., A Professional Association Law Firm

CIRCUIT CASE NO. 05-0911
DIVISION G

INDEPENDENT ACTION COMPLAINT PER Fla. R. Civ. P. 1.540

DEFENDANTS

HEATHER M. GRAY, Individually, CASE NO: 06-6005
HEATHER M. GRAY, ATTORNEY AT LAW,
HEATHER M. GRAY, PROFESSIONAL ASSOCIATION AS A FLORIDA
CORPORATION,

INDEPENDENT ACTION COMPLAINT PER Fla. R. Civ. P. 1.540

DEFENDANTS

KAREN HARROD TOWNSEND, Individually, CASE NO 05-9605 Civil and
02-4974, Family Court

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

SUPPLEMENTAL AND AMENDED PLEADINGS
FILED HEREIN PER
Fla. R. Civ. P. 1.540 and 1.570 and 1.190
BASED ON NEWLY DISCOVERED EVIDENCE
AND THEREBY
ADDING OR REINSTATING OF DEFENDANTS AND CLAIMS

RON BECK, AS PASTOR /MEMBER OF FBCCP AS OF CPCS SCHOOL BOARD,
HERMAN MEISTER AS CPCS SCHOOL BOARD MEMBER,
KAREN HARROD TOWNSEND AS
EMPLOYEE OF CITRUS PARK CHRISTIAN SCHOOL, (CPCS)
A MINISTRY OF THE FBCCP
ROBERT GILES AS MEMBER OF THE CPCS SCHOOL BOARD,
PAULA POWELL, Individually, PAULA POWELL AS FBCCP FINANCIAL
SECRETARY EMPLOYEE, PAULA POWELL AS CPCS SCHOOL BOARD
MEMBER,
TIM JEFFERS, AS FBCCP TRUSTEE (2005-present)
CARL (BUDDY) RAWLS, Individually, CARL(BUDDY) RAWLS, AS MEMBER OF
THE LONG RANGE PLANNING COMMITTEE FBCCP,
DUANE MILFORD, Individually,
DUANE MILFORD AS LONG RANGE PLANNING COMMITTEE MEMBER
OF FBCCP,
KAREN JEFFERS, Individually,
KAREN JEFFERS AS EMPLOYEE AS PRINCIPLE OF CPCS,
GAYLE LYNN, Individually,
GAYLE LYNN, AS EMPLOYEE AS DEAN OF STUDENTS CPCS,
APRIL BECK, Individually,
APRIL BECK, AS EMPLOYEE OF CPCS

APRIL BECK, AS MEMBER OF FBCCP
JIM LEAHY, Individually,
JIM LEAHY AS PERSONNEL COMMITTEE CHAIRMAN OF FBCCP,
JOE KAREAS, Individually,
MICHAEL JOHN CORBIN, Individually,
MICHAEL JOHN CORBIN AS MEMBER OF THE LONG RANGE PLANNING
COMMITTEE FBCCP,
MICHAEL JOHN CORBIN, AS PASCO COUNTY SHERIFF DEPUTY DETECTIVE,
JOYCE MEISTER, Individually,
JOYCE MEISTER, AS EMPLOYEE OF CPCS
JACKIE HOWLETT, Individually,
JACKIE HOWLETT AS CPCS SCHOOL BOARD MEMBER,
JACKIE HOWLETT AS MEMBER OF THE LONG RANGE PLANNING
COMMITTEE FBCCP,
JOE HOWLETT AS HILLSBOROUGH COUNTY SHERIFF DEPUTY,
MIKE SMOAK, AS Individually,
MIKE SMOAK AS CPCS SCHOOL BOARD MEMBER,
MIKE SHAR, Individually,
JOHN A. GRANT, JR. Individually,
JOHN A. GRANT, JR. AS REGISTERED AGENT OF First Baptist Church of Citrus
Park CORPORATION,
UTICA INSURANCE COMPANY OF NEW YORK,
CHARLES DENNY, IV, Individually,
CHARLES DENNY, IV, AS ATTORNEY AT
LAW FOR THE FIRM OF DICKINSON & GIBBONS P.A.,
THE LAW FIRM OF DICKINSON & GIBBONS, P.A. ATTORNEYS AT LAW,
JAMES ROLFES, Individual,
A. JAMES ROLFES, AS ATTORNEY AT LAW,
A. JAMES ROLFES, AS ATTORNEY OF THE LAW FIRM OF DICKINSON &
GIBBONS, P.A. ATTORNEYS AT LAW,
DREW GARDNER, AS Individual,
DREW GARDNER AS ATTORNEY AT LAW FOR THE CHRISTIAN LAW
ASSOCIATION
THE CHRISTIAN LAW ASSOCIATION, A FLORIDA CORPORATION
DAVID GIBBS, III, Individual,
DAVID GIBBS, III, AS ATTORNEY AT LAW, GIBBS LAW FIRM. P.A.
DAVID GIBBS, III AS ATTORNEY AT LAW, OF THE CHRISTIAN LAW
ASSOCIATION
STACEY TURMEL, Individually,
STACEY TURMEL AS ATTORNEY AT LAW, OF STACEY TURMEL, P.A.,
THE LAW FIRM OF STACEY TURMEL, P.A.
MR. CHARLIE CRIST, Individually,
MR. CHARLIE CRIST, AS IN THE OFFICIAL POSITION AS THE ATTORNEY
GENERAL FOR THE STATE OF FLORIDA,
THE OFFICE/DEPARTMENT OF THE ATTORNEY GENERAL FOR THE STATE
OF FLORIDA

Mr. TOM GALLAGHER, Individually,
MR. TOM GALLAGHER, AS IN THE OFFICIAL POSITION AS THE CHIEF
FINANCIAL OFFICER OF THE STATE OF FLORIDA DEPARTMENT OF
FINANCIAL SERVICES, and
THE DEPARTMENT OF FINANCIAL SERVICES,
THE DEPARTMENT OF CHILDREN AND FAMILIES OF THE STATE OF
FLORIDA,
DAVID GEE, AS SHERIFF OF HILLSBOROUGH COUNTY FLORIDA, and
DEPUTY SHERIFF JOE HOWLETT AND
DEPUTY SHERIFF MIKE SMOAK AND
DEPUTY SHERIFF SCOTT WELLINGER, Individually,
SCOTT WELLINGER, AS A HILLSBOROUGH COUNTY SHERIFF DEPUTY
SERGEANT,
DEPUTY SHERIFF LUTHER CORE, Individually,
LUTHER CORE AS HILLSBOROUGH COUNTY SHERIFF DEPUTY DETECTIVE
EXECUTIVE SUPPORT DEPARTMENT INTERNAL AFFAIRS,
DEPUTY SHERIFF PAUL J. GUARINO, Individually,
PAUL J. GUARINO, AS HILLSBOROUGH COUNTY SHERIFF DEPUTY
SERGEANT PROPERTY CRIMES UNIT,
DEPUTY HARRY HOOVER, Individually,
HARRY HOOVER, AS HILLSBOROUGH COUNTY SHERIFF DEPUTY
SERGEANT FOR INTERNAL AFFAIRS,
JAMES (JIM) COATS, AS SHERIFF OF PINELLAS COUNTY FLORIDA,
DEPUTY SHERIFF JOSEPH A. GILLETTEE, SERGENT ADMINISTRATIVE
INVESTIGATIONS DIVISION PINELLAS COUNTY SHERIFF' OFFICE
DEPUTY SHERIFF TIM JEFFERS,
THE PINELLAS COUNTY SHERIFF'S OFFICE
BOB WHITE, AS SHERIFF OF PASCO COUNTY FLORIDA,
DEPUTY SHERIFF JOHN MICHEAL CORBIN OF PASCO COUNTY FLORIDA,
THE DEPARTMENT OF THE PASCO COUNTY SHERIFF,
THE CHIEF OF POLICE OF TAMPA, FLORIDA, and
POLICE OFFICER JOE KAREAS OF THE CITY OF TAMPA,
THE CITY OF TAMPA
CYNTHIA BARNARD SANZ, Individually,
CYNTHIA BARNARD SANZ AS
SPECIAL AGENT SUPERVISION FOR THE FLORIDA DEPARTMENT OF
LAW ENFORCEMENT,
MR. GERALD BAILEY COMMISSIONER, FLORIDA DEPARTMENT OF LAW
ENFORCEMENT,
THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT
CURTIS BAUGHMAN, Individually,
NANCY LOPEZ, Individually,
CURTIS BAUGHMAN AND NANCY LOPEZ AS EMPLOYEES OF VICTIMS
ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA,
THE DEPARTMENT OF VICTIMS ASSISTANCE
MARK A. OBER, Individually,

MARK A. OBER AS STATE ATTORNEY OF FLORIDA,
CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY
FLORIDA CIRCUIT CIVIL COURTS,
MANUEL MENENDEZ JR. Individually,
WAYNE TIMMERMAN, Individually,
JUDGE WAYNE TIMMERMAN A CIRCUIT COURT JUDGE OF HILLSBOROUGH
COUNTY FLORIDA,
RAUL PALOMINO, Individually,
JUDGE RAUL PALOMINO, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
FRANK GOMEZ, Individually,
JUDGE FRANK GOMEZ A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
MONICA SIERRA, Individually,
JUDGE MONICA SIERRA, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
RALPH STODDARD, Individually,
JUDGE RALPH STODDARD, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
GREG HOLDER, Individually,
JUDGE GREG HOLDER, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
MARVA CRENSHAW, Individually,
JUDGE MARVA CRENSHAW, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH
COUNTY FLORIDA,
RAQUEL A. RODRIQUEZ, Individually,
RAQUEL A. RODRIQUEZ AS GENERAL COUNSEL TO THE OFFICE OF THE
GOVERNOR OF THE STATE OF FLORIDA
BROOKE S. KENNERLY, Individually,
BROOKE S. KENNERLY AS EXECUTIVE DIRECTOR FOR THE JUDICIAL
QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA,
THE JUDICIAL QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA,
THE FLORIDA BAR,
THE FLORIDA BAR OFFICER OF EXECUTIVE DIRECTOR,
THE FLORIDA BAR OFFICER OF TAMPA BRANCH OFFICE
EXECUTIVE/DISCIPLINE DIRECTOR AS BRANCH STAFF COUNSEL,
THE FLORIDA BAR TAMPA INTAKE STAFF COUNSEL EMPLOYEE, MS. "DOE"
LIEMAN,
MS. "DOE" LIEMAN, Individually,
THE FLORIDA BAR TAMPA INTAKE STAFF EMPLOYEE MS. JANE CRISTY and
Ms. JANE CRISTY, Individually
THE STATE OF FLORIDA, and
THE SHERIFF OF SANTA ROSA COUNTY, AND
SANTA ROSA COUNTY, OF THE STATE OF FLORIDA
HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA
KMART CORPORATION also d.b.a. SEARS HOLDING COMPANY

JOE PALKO, Individual,
JOE PALKO, EMPLOYEE AS Vice President (Kmart) SEARS HOLDING COMPANY
RANDY BRIGHT, Individual,
RANDY BRIGHT, (Kmart) EMPLOYEE AS REGIONAL COACH,
KEITH JOHNSON, Individual,
KEITH JOHNSON, (Kmart) EMPLOYEE AS REGIONAL HUMAN RESOURCES
DIRECTOR,
SHANE PEARSON, Individual,
SHANE PEARSON, (Kmart) EMPLOYEE AS LOSS PREVENTION DISTRICT
COACH,
KATHERINE CUNNINGHAM, Individual,
KATHERINE CUNNINGHAM, (Kmart) EMPLOYEE AS DISTRICT
COORDINATOR SECRETARY
DANIEL J. GENTILE, Individual,
DANIEL J. GENTILE, (Kmart) EMPLOYEE AS DISTRICT COACH
DOUG LIVINGSTON, Individual,
DOUG LIVINGSTON, AS KMART EMPLOYEE LOSS PREVENTION COACH,
AT STORE 3092,
ROY ALLEN, Individual,
ROY ALLEN, KMART EMPLOYEE AS ASSISTANT COACH, AT STORE 3092,
DR. LINDA ROWE CAMPBELL, Individual,
DR. LINDA ROWE CAMPBELL, (Kmart) EMPLOYEE AS PHARMACIST AT
STORE 3092
BARBARA BOOTH, Individual,
BARBARA BOOTH, (Kmart) EMPLOYEE AT STORE 3092
AS DEFENDANTS,

Plaintiff's motion is made on the ground that the proposed discovery is necessary to conform the pleadings to the evidence in the action, to determine completely the rights of the parties in the action, and to fully present plaintiff's cause of actions as now proved since 1993, an elected officer/member of the First Baptist Church of Citrus Park, who has been denied his lawful and BY-LAWS Rights per the Church and State Organization policies. Plaintiff has been investigation unlawful actions of the Finance Committee, the Pastors and of the allegedly elected Trustees and these reports/papers/electronic "work" of Janssen & Horgan C.P.A. is necessary for this review and investigation.

Per the September 7, 2006, ruling in the Case Management Conference of the Judge Marva Crenshaw, she stated that all relevant facts at the time of the Malicious Prosecution Case would be required and allowed for presentation to the Jury so all facts could be understood by the Jury.

Further, for additional proofs of the relevance of this Discovery request one may go to www.Judgeoneyourself.com and review the position of Plaintiff.

Production per this motion should be forwarded within 30 days from the date of Service herein as _____ to Randall Townsend P.O. Box 21, Odessa, FL 33556.

Plaintiff seeks all and any the production of all documents, applications, letters, electronic messages and or any type of correspondence regarding the following parties and as listed in the above stated Federal Case:

1. First Baptist Church of Citrus Park, located at 7705 Gunn Highway, Tampa, Florida 33625 and with property located at 18105 North Gunn Highway, Odessa, Florida 33556.
2. Ronald L. Beck as individual and as Senior Pastor of the First Baptist Church of Citrus Park whose home residence is 15305 Heathridge Drive, Tampa, Florida 33625.

Certificate of Service

I hereby certify that a copy of the foregoing was provided by U.S. Mail this _____ day of _____, 200____, to Attorney Charles Denny at Dickinson & Gibbons 401 North Cattlemen Road, Suite 300, Sarasota, Fl 34232.

Respectfully submitted,

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