

**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](http://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