

IN THE CIRCUIT COURT  
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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**PLAINTIFFS RESPONSE TO DEFENDANTS**  
**MOTION FOR SUMMARY JUDGMENT**

COMES NOW PLAINTIFF RANDALL TOWNSEND, PRO SE AND STATES:

1. Multiple questions still remain pending for this court and for a jury which block a summary judgment:
  - a. FOR THE COURT:
    - (1) Ruling on the Second Amended Pleading adding with Beck and the First Baptist Church Corporation the individuals detailed in the Second Amended Pleadings as CO- DEFENDANTS as admitted by Beck per the transcript of Beck in the hearing before Palomino, that he was in the court having filed the action and wishing it to be continued on behalf of himself and his corporation members,
    - (2) Ruling on the Second Amended Pleading showing the proofs TO THE LEVEL TO SHOW THE ACTIONS WERE WITH “MALICE” by including documents of the courts and transcripts of hearings as proofs of the tort actions and malice done by these defendants and the co-defendants
    - (3) Ruling to show that Beck, the co conspirators listed, the yet unnamed co conspirators and members and the officers and the Corporation as a whole and as individuals have motives of loosing their jobs, loosing their alleged “christian” and “pastors” reputations, going to jail for their practice of hate crimes against this defendant/respondant/now plaintiff pro se, loosing nonprofit corporation status, going to jail for violations of tax laws and state filing laws, going to jail for giving false reports to police officers, going to jail for perjury, loosing their continued appeals to build at 40 plus acres north

Gunn Highway property the proposed new school which this Defendant/Plaintiff Pro Se father/Long Range Planning Committee Chairman said would not be allowed by the community and the county and going to jail for not reporting and mis-appropriation of not for profit corporation funds as this member/defendant/respondant/plaintiff now pro se has proved with the documents attached to the pleadings.

- (4) Ruling on the Second Amended Pleading showing proofs of damages of the INJUNCTIONS which now have prevented this father from being with or seeing his kids now since November 2002 **and before as Beck and his co-defendants did since 1995** as will be proved in depositions and interrogatories once this court stops letting Denny and other lawyers fraud the courts that the information to be gained is not privileged or trade secret or not likely to lead to other causes of action but will expose the “ODIOUS AND OUTRAGEOUS” conduct done by his criminals in the church/school and in the public streets and malls and even in the lies told to the courts in full defiance of using perjury in affidavits and in open testimony and in frauds presented by their attorneys.
- (5) And many more yet unsettled facts as discovery of the documents requested since 199\_\_\_’s have been blocked by Defendants and now the lawyers will show additional crimes which harmed this defendant/respondant/plaintiff being called a “liar” and “dangerous from a stress related breakdown” but will show this Randall Townsend was telling the truth ON ALL MATTERS AND STILL IS PER THE LAW ACTING VERY SANE AND DETERMINED TO EXPOSE THE FRAUDS AND THE CRIMINALS BEHIND ALL FRAUDS!

b. FOR THE JURY:

- (1) WHAT STATEMENT IS FACTUALLY TRUE—“What Beck said to Judge Palomino that this Defendant/respondent/now Plaintiff pro se wrote and said about Beck and the others was a fraud as Beck alleged or what the evidence shows as to:
  - (a) Was the actions by Beck a fraud to judge Palomino to distract the attention away from his criminal acts with the company records as this Defendant/respondent/now plaintiff pro se states Beck charges were fraud
  - (b) Was the actions by Beck a fraud to Judge Palomino to distract the attention away from his criminal act of stealing the microphone from the Awana children and this Awana Commander Defendant reporting this criminal act a motivation for Beck to fraud the members and then slander this Defendant now Plaintiff
  - (c) Was the actions by Beck a fraud to Judge Palomino to distract the attention away from his and school pastor Herman Meister’s criminal act of making false reports about the building project to the professionals to thus then gain false reports to then provide to the

corporation members to gain their support to extract more money out of them and also use this false information to try to prove the knowledge and facts stated by this Long Range Planning Chairman turned defendant/respondant/now plaintiff pro se  
I willingly state that the above is true and will gladly raise my hand on oath and testify to the same in full.

Respectfully submitted,

Randall C. Townsend, Pro Se  
P.O. Box 21,  
Odessa, Fl. 33556  
813 920-9633

By: \_\_\_\_\_  
Randall C. Townsend

BEFORE ME, THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED RANDALL C. TOWNSEND, PRESENTING IDENTIFICATION, WHO UPON BEING DULY SWORN STATED THE FORGOING IN THE ABOVE DOCUMENT IS TRUE AND IS HIS OWN WORDS.

WITNESS MY HAND AND OFFICIAL SEAL THIS \_\_\_\_\_ day of \_\_\_\_\_, in \_\_\_\_\_.  
BY ID PRODUCED \_\_\_\_\_.

NOTARY PUBLIC: \_\_\_\_\_

Certificate of Service

I hereby certify that a copy of the foregoing was provided by U.S. Mail this \_\_\_\_\_ day of \_\_\_\_\_ 2003, to First Baptist Church Citrus Park as Corporation and as said members as Defendants at 7705 Gunn Hwy. Tampa, Florida, 33625 via their attorney Dickinson & Gibbons, P.A. Post Office Box 3979, Sarasota, Fl 34230 and to the clerk of this court at 419 Pierce Street, Tampa, Florida, 33602. And to the Honorable Judge Crenshaw at 419 Pierce Street, Tampa, Florida, 33602.

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Randall C. Townsend