

IN THE FIFTH  
DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA  
FIFTH DISTRICT RULING ON BEHALF OF SECOND DISTRICT  
**PER RECUSAL ORDER OF SUPREME COURT JUSTICE CANADY**  
**CASE NO. 2D-10-774**

RANDALL C. TOWNSEND ET AL	)	BRIEF ON JURISDICTION
RESPONDENTS/PLAINTIFFS/	)	
APPELLANTS	)	
	)	NOTICE OF APPEAL
Vs.	)	
	)	MOTION FOR WRIT
HEATHER M. GRAY ET AL	)	OF:
APPELLEES	)	CERTIORARI;
	)	HABEAS CORPUS;
		MANDAMUS;
		CORAM NOBIS;
		PROHIBITION;

**PER RELATED CASES**

**IN RE: SC2011-41 ORDER OF CHIEF JUDGE CANADY TO  
DISQUALIFY 2<sup>nd</sup> DCA TO ENGAGE THE 5<sup>TH</sup> DCA (received  
12/29/2010)**

**IN RE: SC09-1121 ORDER DISBARRING ATTORNEY HEATHER  
M. GRAY (Former Attorney Retained to Appeal ALL Rights of  
Townsend ET AL.)**

**IN RE: SC09-1910 ORDER FOR STATEWIDE GRAND JURY #19**

**IN RE: SC2000 BUSH v. GORE**

**IN RE: SC60-95935 TOWNSEND v. BRUCE CHAPIN ET AL.; P.C.A.  
5D98-2111**

**IN RE: SC60-95936 TOWNSEND v. DAVID POPPER ET AL.; P.C.A.  
5D98-1866**

**IN RE: SC60-86918 TOWNSEND v. LANE; P.C.A. 5D94-1913 5<sup>th</sup> DCA**

**IN RE: SC07-1181 TOWNSEND ET AL v. KAREN TOWNSEND ET  
AL. 2<sup>nd</sup> DCA**

**Now as R.O.C.P 1.530 and 1.540 Action By Proved Frauds: Extrinsic,  
Intrinsic and Fraud to the Courts by all defendants in collusion of  
their criminal enterprises inclusive of: Florida Bar Officers;  
judges; attorneys; Law enforcers and “others Doe” including now**

**former Florida Supreme Court Judges and their “Other Agents”  
as**

**Townsend ET AL v. Beck ET AL 02-03812, 13<sup>th</sup> Circuit consolidated as:  
IN RE: 2D10-774 TOWNSEND ET AL. v. HEATHER GRAY ET AL;  
IN RE: 13<sup>th</sup> Circuit 06-6005 TOWNSEND ET AL. v. HEATHER  
GRAY ET AL.**

**IN RE: 13<sup>th</sup> Circuit 05-0911 TOWNSEND ET AL. v. CHARLES H.  
SCRUGGS III (Florida Bar # 071911) ET AL  
FLORIDA BAR COMPLAINTS- 05-3977; 93-31, 690 and 691 and 692;  
Federal Case TOWNSEND ET AL v. BECK ET AL 8:06-CV2050T-30-  
TGW Tampa (Judge Moody Jr. and 11<sup>th</sup> Circuit Court of Appeals  
Admitting Attorney/“Government” Negligent Services) as:**

RANDALL TOWNSEND, )  
Individual, and as F.S. §617.0834, )  
“Representative” As on behalf of all )  
other Corporate members “non sect” )  
as the rightful shareholders of The )  
First Baptist Church of Citrus Park )  
and Citrus Park Christian School )  
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 )  
CORPORATION AS (FBCCP) AND )  
AS “NEXT FRIEND” AS “DOE”) )  
AS ALL MINOR CHILDREN )  
AND “OTHERS” AS “DOE” OF )  
And For Plaintiff THE “NOT FOR )  
PROFIT” CORPORATION )  
KNOWN AS FIRST BAPTIST )  
CHURCH OF CITRUS PARK, )  
(FBCCP) AND )  
CITRUS PARK CHRISTIAN )  
SCHOOL, INC.(CPCS) and as All )

**BRIEF ON JURISDICTION  
AND  
DEMAND FOR WRIT(S)**

**FROM THE 5<sup>TH</sup> DCA FROM THE  
2DCA CASE NO 2D10-774  
LOWER CAUSE  
CIVIL ACTION COMPLAINT  
CASE NO: \_ CASE NO: 06-6005**

**JURY TRIAL DEMANDED**

**INJUNCTIVE RELIEF SOUGHT**

**CLAIM FOR CLASS ACTION**

Members of the Citizens “Classes” )  
AS “Father/Parent Class” and )  
AS “Church Class” and )  
AS “Florida Citizens Class” )  
Plaintiffs )  
v. )  
**HEATHER M. GRAY,** )  
**Individually,** )  
**HEATHER M. GRAY,** )  
**ATTORNEY AT LAW,** )  
**HEATHER M. GRAY,** )  
**PROFESSIONAL** )  
**ASSOCIATION AS A** )  
**FLORIDA CORPORATION,** )  
And Co-Defendants as )  
RONALD L. BECK, )  
(a.k.a. Ron Beck) Individually, )  
REVEREND RONALD L. BECK, )  
AS SENIOR PASTOR, OF )  
FIRST BAPTIST CHURCH OF )  
CITRUS PARK, (FBCCP), )  
ET. AL. AND NOW As per all as )  
DEFENDANTS Listed Below herein,

AS STATED BELOW

**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 Et.Al.**  
**Plaintiffs, or as Appellants**  
**V.**

**L.T. CIRCUIT CASE NO: 02-03812**  
**2DCA- CASE NO: 2D07-4861**  
**DIVISION: K**  
**FROM CASE NO: 01-15813 and 01-15814**  
**OF FAMILY COURT –DOMESTIC**  
**VIOLENCE DIVISION, &**  
**02-4974-DIVORCE, AND**  
**By Motions for Consolidation of below**  
**Related cases, tried to be heard and tried**  
**herein by jury but was unlawfully denied.**

RONALD L. BECK, (a.k.a. Ron Beck) INDIVIDUALLY, REVEREND RONALD L. BECK, AS SENIOR PASTOR, OF FIRST BAPTIST CHURCH OF CITRUS PARK, (Hereinafter as FBCCP), RON BECK, AS PASTOR /MEMBER OF FBCCP AS OF CPCS SCHOOL BOARD, RON BECK, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER, AS BY-LAW’S PASTOR/MEMBER OF ALL COMMITTEES OF FBCCP AND CPCS  
WILLIAM T. BROWN, (a.k.a. Bill Brown), INDIVIDUALLY, REVEREND WILLIAM T. BROWN, OF FBCCP AS PASTOR OF EDUCATION AND ADMINISTRATION;  
HERMAN MEISTER, INDIVIDUALLY, REVEREND HERMAN MEISTER, AS

PASTOR OF SCHOOL MINISTRIES, OF FBCCP; HERMAN MEISTER AS CPCS EMPLOYEE AND SCHOOL BOARD MEMBER, HERMAN MEISTER AS BY-LAW PASTOR/MEMBER OF ALL COMMITTEES OF FBCCP/CPCS, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,

GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE(1997-2005) DEACON AND GARY LEATHERMAN AS MEMBER OF FINANCE COMMITTEE OF FBCCP AND GARY LEATHERMAN AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,

ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP; ROBERT GILES AS FBCCP DEACON, ROBERT GILES AS MEMBER OF THE CPCS SCHOOL BOARD, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,

TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER OF FBCCP TIM JEFFERS, AS FBCCP DEACON, TIM JEFFERS, AS FBCCP TRUSTEE (2005-present),

FRANK EDWARDS, INDIVIDUALLY, FRANK EDWARDS AS FBCCP FINANCE COMMITTEE MEMBER, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,

MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP;

MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMATE, AS CHAIRMAN OF DEACONS, 2000-2001, OF FBCCP;

JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE,(1995-present) OF FBCCP, JOE HOWLETT AS FINANCE COMMITTEE MEMBER 2007

GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS ALLEGED CORPORATION PRESIDENT, AND AS TRUSTEE (at all times), GEOFF SMITH AS FBCCP DEACON; GEOFF SMITH, AS CHAIRMAN OF PHASE I COMMITTEE;

DR. LON LYNN, INDIVIDUALLY, DR. LON LYNN, AS A PROFESSIONAL MEDICAL DOCTOR,

KAREN HARROD TOWNSEND, Individually, KAREN HARROD TOWNSEND AS EMPLOYEE OF CPCS

PAULA POWELL, Individually, PAULA POWELL AS FBCCP FINANCIAL SECRETARY EMPLOYEE, PAULA POWELL AS CPCS SCHOOL BOARD MEMBER,

CARL (BUDDY) RAWLS, Individually, CARL(BUDDY) RAWLS, AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, AND DEACON

DUANE MILFORD, Individually, DUANE MILFORD AS LONG RANGE PLANNING COMMITTEE MEMBER OF FBCCP, AS PERSONNEL COMMITTEE MEMBER AS CHAIRMAN,1997, AND AS PROPERTY ACQUISITION COMMITTEE MEMBER,

KAREN JEFFERS, Individually, KAREN JEFFERS AS EMPLOYEE AS SCHOOL PRINCIPLE OF CPCS,

GAYLE LYNN, Individually, GAYLE LYNN, AS EMPLOYEE AS DEAN OF STUDENTS CPCS,

APRIL BECK, Individually, APRIL BECK, AS EMPLOYEE OF CPCS

JIM LEAHY, Individually, JIM LEAHY AS PERSONNEL COMMITTEE CHAIRMAN OF FBCCP, JIM LEAHY AS DEACON FBCCP,  
JOE KAREAS, Individually,  
MICHAEL JOHN CORBIN, Individually, MICHAEL JOHN CORBIN AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP,  
JACKIE CORBIN, Individually, JACKIE CORBIN AS CPCS SCHOOL BOARD MEMBER 2007  
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,  
MIKE SMOAK, AS Individually, MIKE SMOAK AS CPCS BOARD MEMBER, 1999-2007  
MIKE SHAR, Individually,  
THE FIRST BAPTIST CHURCH OF CITRUS PARK BOARD OF DEACONS OF 1999-2000-2001-2002-2003-2004-2005-2006  
DON BECK, Individually, DON BECK, AS DEACON,  
JOHN COLLINSON, Individually, JOHN COLLINSON, AS DEACON,  
BILL CRAFT, Individually, BILL CRAFT, AS DEACON, BILL CRAFT AS 2007 CHAIRMAN OF THE FINANCE COMMITTEE  
ED HOPKINS, Individually, ED HOPKINS, AS DEACON,  
JERRY MILLER, Individually, JERRY MILLER, AS DEACON,  
WILSON SMITH, Individually, WILSON SMITH, AS DEACON  
DAVID POWELL, Individually, DAVID POWELL, AS DEACON, (Inactive 2007)  
MIKE POWELL, Individually, MIKE POWELL, AS DEACON  
MIKE HOLNESS, Individually, MIKE HOLNESS, AS General Member  
MARK JEFFERS, Individually, MARK JEFFERS, AS General Member  
DAVE FERGUSON, Individually, DAVE FERGUSON, AS PASTOR/OFFICER et al.  
AS THESE SELECT ASSOCIATES AND OFFICERS ABOVE AS ALSO GENERAL MEMBERS OF THE CORPORATION ALLEGING TO ACT LAWFULLY AS d/b/a,  
FIRST BAPTIST CHURCH OF CITRUS PARK, (FBCCP) and CITRUS PARK CHRISTIAN SCHOOL, (“CPCS”), A MINISTRY OF FBCCP, a Corporation per F.S.617, “Not for profit”

AND AS ALSO THESE as a “Sect Class” and with the  
THIRD PARTY INDIVIDUALS, as “Sect Agents Class” a.k.a. (Black/Blue) as  
AGENTS AND OR AGENCIES OR OTHERS AS “PERSONS” WHO TORTFULLY  
AND NEGLIGENTLY INTERFERE IN CONTRACT AND BY-LAWS “RIGHTS” AS

---

**CHARLES H. SCRUGGS III.,** **CIRCUIT CASE NO. 05-0911**  
**Individually,** **DIVISION G**  
**CHARLES H. SCRUGGS, III. ESQUIRE,** **APPEALS CASE:2D06-2811**  
**As attorney at law/ former Circuit Judge**  
**CHARLES H. SCRUGGS, III, P.A., A Professional Association Law Firm,**

---

**KAREN HARROD TOWNSEND, Individually,** **CASE NO 05-9605 Civil**

KAREN HARROD TOWNSEND AS  
EMPLOYEE OF (CPCS) OF THE FBCCP

**Per R.O.C.P 1.540 an Independent  
ACTION and of  
02-4974, Family Court and  
APPEALS CASE: 2D06-3469  
FLORIDA S.Ct. SC07-1181  
FROM CASE NO: 01-15814 and  
related CASE NO: 01-15813 and  
02-03812**

**STEVEN TYLER HARROD, Individually,  
DONALD HARROD, Individually,  
NORMA HARROD, Individually,**

---

JOHN A. GRANT, JR. Individually, JOHN A. GRANT, JR. AS REGISTERED AGENT  
OF FBCCP/CPCS CORPORATION, JOHN A. GRANT, JR. Attorney at Law,  
JOHN GRANT AS NOW FORMER STATE OF FLORIDA SENATOR  
DUANE JANSSEN, Individually, and DUANE JANSSEN AS C.P.A. and DUANE  
JANSSEN AS C.P.A. for JANSSEN & HORGAN as NOW JANSSEN & IGOR  
C.P.A., P.A.

JANSSEN & IGOR. (Formerly Janssen & Horgan) C.P.A.'s, P.A. a Florida 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,

A. 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.

THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA UNDER THE  
CARE AND SUPERVISION OF JEB BUSH AND CHARLIE CRIST,

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

THE OFFICE/DEPARTMENT OF THE BOARD OF EDUCATION FOR THE STATE  
OF FLORIDA

Mr. CHARLIE CRIST, AS FORMER DEPARTMENT OF EDUCATION  
COMMISSIONER

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, (HCSO)  
DAVID GEE, Individually,  
DAVID GEE, AS EXECUTIVE OFFICER OF THE COURT OF HILLSBOROUGH  
COUNTY  
GARY TERRY, Individual,  
GARY TERRY, AS HCSO DEPUTY- (Major/now Coronal)  
JOE HOWLETT AS HILLSBOROUGH COUNTY SHERIFF DEPUTY,  
JOHN CAMPO, Individual, JOHN CAMPO, AS HCSO DEPUTY  
RICHARD WALKER, Individual, RICHARD WALKER, AS HCSO DEPUTY  
CAL HENDERSON, AS Past SHERIFF OF HILLSBOROUGH COUNTY, FLORIDA,  
CAL HENDERSON, Individually,  
WALTER HEINRICH, AS Past SHERIFF OF HILLSBOROUGH COUNTY FLORIDA,  
WALTER HEINRICH, Individually,  
MIKE SMOAK, A HCSO DEPUTY AND  
SCOTT WELLINGER, Individually, SCOTT WELLINGER, AS HCSO DEPUTY  
LUTHER CORE, Individually, LUTHER CORE AS HCSO DEPUTY  
PAUL J. GUARINO, Individually, PAUL J. GUARINO, AS HCSO DEPUTY,  
HARRY HOOVER, Individually, HARRY HOOVER, AS HCSO DEPUTY,  
KEVIN L. BODIE, Individually, KEVIN L. BODIE, AS HCSO DEPUTY,  
J.R. BURTON, Individually, J.R. BURTON, AN HCSO DEPUTY  
JAMES (JIM) COATS, Individually, JIM COATS AS SHERIFF OF PINELLAS  
COUNTY FLORIDA, (PCSO)  
EVERETT RICE, Individually,  
EVERETT RICE, AS FORMER SHERIFF OF PINELLAS COUNTY  
TIM JEFFERS, as PINELLAS COUNTY SHERIFF DEPUTY,  
JOSEPH A. GILLETTEE, Individually, GILLETTE AS PCSO DEPUTY,  
THE PINELLAS COUNTY SHERIFF'S OFFICE (PCSO)  
BOB WHITE, AS SHERIFF OF PASCO COUNTY FLORIDA,  
MICHAEL JOHN CORBIN, AS PASCO COUNTY SHERIFF DEPUTY DETECTIVE,  
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,  
MICHAEL O'CONNELL, Individually,  
MICHAEL O'CONNELL, SPECIAL AGENT FOR THE FLORIDA DEPARTMENT  
OF LAW ENFORCEMENT,

MR. GUY TUNNELL, FORMER COMMISSIONER, FLORIDA DEPARTMENT OF  
LAW ENFORCEMENT, NOW AS  
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,  
BOB PETSCHOW, individually and BOB PETSCHOW, AS ASSISTANT TO THE  
STATE ATTORNEY  
CHUCK HOLLAND, individually and CHUCK HOLLAND AS ASSISTANT TO THE  
STATE ATTORNEY  
CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY  
FLORIDA CIRCUIT CIVIL COURTS,  
MANUEL MENENDEZ JR. Individually,  
JAMES ARNOLD, Individually,  
JAMES ARNOLD, A CIRCUIT COURT JUDGE OF HILLSBOROUGH  
COUNTY FLORIDA,  
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,  
REX M. BARBAS, Individually,  
JUDGE REX M. BARBAS, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH  
COUNTY FLORIDA,

MARTHA J. COOK, Individually,  
JUDGE MARTH J. COOK, 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 OFFICE OF THE FLORIDA BAR OFFICER OF EXECUTIVE DIRECTOR,  
JOHN F. HARKNESS, JR, INDIVIDUAL,  
JOHN F.HARKNESS, AS EXECUTIVE DIRECTOR OF THE FLORIDA BAR  
JOHN BARR, INDIVIDUALLY, JOHN BARR AS THE FLORIDA BAR,  
COMPLAINTS IN PERSON EMPLOYEE  
THE OFFICE OF THE PRESIDENT OF THE FLORIDA BAR,  
HENRY M. COXE III, INDIVIDUAL,  
HENRY M. COXE III, AS PRESIDENT OF THE FLORIDA BAR  
THE FLORIDA BAR OFFICER OF TAMPA BRANCH OFFICE  
EXECUTIVE/DISCIPLINE DIRECTOR AS BRANCH STAFF COUNSEL,  
TONY BOGGS, INDIVIDUALLY,  
TONY BOGGS, AS THE FLORIDA BAR DISCIPLINARY PROCEEDURES  
EMPLOYEE  
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, Individually and AS SHERIFF,  
SANTA ROSA COUNTY DEPUTY DETECTIVE RYAN, Individually and AS Deputy  
SANTA ROSA COUNTY DEPUTY WHEELER, Individually and AS Deputy  
SANTA ROSA COUNTY SHERIFF’ DEPARTMENT  
SANTA ROSA COUNTY, OF THE STATE OF FLORIDA  
HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA  
THE HILLSBOROUGH COUNTY FLORIDA BOARD OF COUNTY  
COMMISSIONERS JOINTLY AND INDIVIDUALLY AS,  
ROSE FERLITA,  
KEN HAGAN,  
KEVIN WHITE,  
AL HIGGINBOTHAM,  
JIM NORMAN,  
BRIAN BLAIR,  
MARK SHARPE AND  
PAT BEAN, AS HILLSBOROUGH COUNTY ADMINISTRATOR  
PAT BEAN ATTORNEY AT LAW AND

PAT BEAN, INDIVIDUALLY  
THE SECOND DISTRICT COURT OF APPEALS and JUDGES OF THE SECOND  
DISTRICT COURT OF APPEALS AS “PERSONS” JOINTLY AND AS  
“PERSONS” INDIVIDUALLY AS,  
STEVAN T. NORTHCUTT,  
CHARLES A. DAVIS,  
CRAIG C. VILLANTI,  
DOUGLAS A. WALLACE,  
EDWARD C. LaROSE,  
CAROLYN K. FULMER,  
CHRIS W. ALTENBERND,  
PATRICIA J. KELLY,  
JAMES BIRKHOOD, INDIVIDUALLY AND AS CLERK OF THE SECOND  
DISTRICT COURT OF APPEALS, LAKELAND FLORIDA  
THE FLORIDA SUPREME COURT, AND JUDGES OF THE FLORIDA SUPREME  
COURT AS JUDGES AND AS “PERSONS” JOINTLY AND “PERSONS”  
INDIVIDUALLY AS,  
CHIEF JUDGE FRED LEWIS,  
CHARLIE T. WELLS,  
HARRY LEE ANSTEAD,  
BARBARA J. PARIENTE,  
PEGGY A QUINCE,  
RAOUL G. CANTERO,  
KENNETH B. BELL  
KMART CORPORATION also d.b.a. SEARS HOLDING COMPANY, INC.(Kmart)  
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 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

MIKE SHUMATE, Individual, MIKE SHUMATE, AS AN OFFICER OF THE UNITED STATES COAST GUARD now retired,  
“DOE”, as any and all Insurance and or Bonding Companies, Carriers or the like for any Defendant or representative of any Defendant herein, past, present or future.  
“DOE”, as any yet unknown accomplice to the acts of defendants herein,  
MEDIA GENERAL OPERATIONS NEWSPAPER, AND AS SUBSIDIARY THE TAMPA TRIBUNE,  
JANET E. COATS, Individually, JANET E. COATS AS EXECUTIVE EDITOR AND VICE PRESIDENT OF THE TAMPA TRIBUNE  
MICHELLE BEARDEN, Individually, MICHELLE BEARDEN, AS TAMPA TRIBUNE REPORTER/EMPLOYEE  
THE SAINT PETERSBURG TIMES,  
BILL COATS, Individually, BILL COATS, AS A SAINT PETERSBURG TIMES EMPLOYEE/REPORTER  
PAUL TASH, Individually, PAUL TASH, AS SAINT PETERSBURG TIMES, EDITOR, CEO and CHAIRMAN  
AS DEFENDANTS,

---

WHEREAS PER THE AUTHORITY OF THIS FLORIDA

SUPREME COURT PER: (1) Respondent Superior; (2) Vicarious Liability; (3) Discretionary Review; (4) Duty to enforce its own ORDERS; (5) Direct, Implied and Express Conflicts and Defiance to Orders of this Florida Supreme Court and DCA’s on the same question(s) of law and even in these same case facts; (6) DCA decisions declaring invalid a state statute or provision of the state Constitution as Article I. Section 3. And Government Persons illegal “**Kolb**” F.S.768 detainment by frauds without due process; (7) Decisions that “Expressly construe a provision of the state or federal constitution; (8) Decisions that “Expressly affect a class of constitutional or state officers.” (9) Request for “Bypass” Certification of this matter to be of Great Public importance of a Class and Classes of Protected Person(s); (10)

Review of Decisions of Eleventh Court of Appeals confirming Malfeasance and Non Representation Due Process Issues by these same Appellees and “others”; (11) Rules of Law or Process or R.I.C.O Acts that “Impede” the rights of a Contract are Unconstitutional; (12) Authority of this Court to issue Writs; (13) Prior Rulings by Chief Judge Canady Affirmed Townsend’s claims that lower courts in this case were disqualified because of prejudice and bias; as stated below:

COMES NOW RESPONDENTS/PLAINTIFFS/APPELLANTS as Randall Townsend (Townsend), as individual, parent/Guardian and as Townsend Nominated and Elected as in 1993 and since lawfully as Member Guardian per F.S. §617. of First Baptist Church of Citrus Park (FBCCP) (A Florida Not for Profit Corporation) and Citrus Park Christian School (CPCS) a subsidiary of FBCCP per the FBCCP By-Laws (A Protected Religious Class) and as Citizen Classes ET AL against the “Sect” of FBCCP Members and Non Members (Sheriff Deputies and their agents and Superior Law Enforcement Officers) and “Others Doe” by proofs in these “related case files” stated in the above Caption and incorporated herein of intentional “frauds, collusion and arbitrariness” per **FIRST FREE WILL Baptist** 4 So2d 390, 148 Fla. 277, as Non Member “Law Enforcers” ET AL including Attorney Gibbs and Attorney/Florida Senator Grant “Under Color Of Law”

to conspire and conceal frauds of a “Sect and Sects Agents” against Members and the FBCCP Corporation and in violation Florida Constitution Article I. Section 3., by self dealing frauds using FBCCP Designated Funds and State Funds and Citizens funds by frauds for these Appellees ET AL and “others” self dealing and criminal acts using Intrinsic and Extrinsic Frauds in FBCCP Business Meetings since about 1994 and Intrinsic and Extrinsic frauds by Townsend and Townsend ET AL attorneys in Florida Courts since 1988 in collusion with judges and “Others” as exposed by rulings of this Florida Supreme Court and Florida Bar Members and Federal Judge James Moody Jr. and The 11<sup>th</sup> Circuit Court of Appeals and 13<sup>th</sup> Circuit Judge Gomez and 13<sup>th</sup> Circuit now 2<sup>nd</sup> DCA Judge Crenshaw and even by 5<sup>th</sup> DCA Judge Orfinger reversing himself in this same case with the same facts of Extrinsic Fraud ignoring confessions by these Appellees and “Others Doe” Estopping themselves and openly admitting to their criminal and Extrinsic Acts still being practiced in their Criminal Enterprise Acts of Obstruction and Witness Tampering and Extortion per the FBCCP By-Laws, Florida Statues, Florida Constitution, United States Constitution and R.O.C.P. 1.530 “unconstitutionally impeding contract rights of Appellants to a jury trial, assembly even by Church and Family Members” to “redress Government” as “Government Agents” who continue their Criminal

Enterprise against Townsend individual thus created these Townsend victims ET AL for whom Townsend still lawfully speaks and states:

Judges Orfinger, Lawson and Sawaya of the 5<sup>th</sup> DCA 9/1/2006

Ruling in **ROBINSON v. WEILAND, ET AL** 5D05-2380 confirms as Townsends legal position has been since 1987 and stated by Townsend, McCarthy and Popper/Chapin in **TOWNSEND v. Lane** cases (Discovery and a Jury Trial would prove damages and vindicate Townsend) as the Cause of this Appeal now being back to this Supreme Court is that Florida Bar Agents (under Harkness and Berry) have conspired to conceal that since early 1988, Attorney Popper (Popper) did malpractice on his Client Townsend when Popper ignored the legal advice of McCarthy and gave Attorney Williams, Jr. an opportunity to intentionally do fraud with his client Charles E. Lane Jr. a/k/a Sabal Marketing and Popper intentionally did not do "Discovery" by Subpoena's to produce the Joint Venture Business Records as McCarthy and Townsend demanded by Popper serving Subpoena's on Lane a/k/a Sabal caught in a variety of criminal acts. Popper by switching law firms and joining with Bruce Chapin, Popper/Chapin (Chapin through his wife Linda Chapin as Orange County Commission Chairperson [And as Fired Attorney Pat Bean in Hillsborough County] was able to control, conspire and prejudice the Circuit Judges, Florida Bar

Officers and “Others” and as being positioned to run on the Governors Ticket with Buddy McKay against Jeb Bush) has been able to control, continue and conceal his: (1) betrayal and defamation of Townsend; (2) Criminal Practices against Townsend and Townsend ET AL using the political practices of his law partner Chapin ET AL and “Others” including those in the allegations of performing intentional frauds on the courts by fabricated false evidence in the Baby Sabrina Aisenberg case under the supervision of HCSO Major Gary Terry as supervisor and friends of Jeffers, Howlett, Smoak and Grant by which Jeffers ET AL and all Appellees and “others” still continue their Criminal Enterprise.

Attorneys/Law Enforcers are not to benefit by conspiring to do fraud(s) on their Clients or Citizens or an unbiased Court and likewise Clients are not to suffer or be subjected to oppression, deprivations and criminal acts practiced on them by attorneys and “law enforcers” as subjects or Agents of this Florida Supreme Court. Per 1-13 above and to protect the integrity of our Court this Florida Supreme Court again must rule and allow “Full Discovery as Townsend has demanded since 1987 and his Attorneys about 1988 being retained thereon” and have an “Evidentiary Hearing” and fair Jury Trial without being “impeded” and “defamed” by Fraudulent Unlawful Government Agents continuing the defamation and criminal

frauds began by Popper.

Because Florida Bar Officers and Agents and “others” conspired and attempted to conceal the first frauds of: Popper(1988)/Chapin and with CLA Attorney David Gibbs (1991) this Criminal Enterprise has been confirmed and created new causes of actions against these willful Co-Participants whom at the direct Counsel of Attorney former Judge Charles Scruggs (Scruggs) being fully informed and knowing all acts president advised hiring Attorney Gray retained, paid and agreed March 14, 2003 to expose in performing her Contract for Services and others promised and failed to do.

These Causes of Actions as violations of Constitutional Civil Rights even of claims of violations of a Specific Contract of a Religious Group and deprivations because of Race and Interference with Child Custody and Negligent Actions against Children and Elderly Persons all are enjoined just because Popper ET Al began and still conspire to “defame Townsend and never let Townsend prove his causes in a fair court of law”.

FBCCP Church “Sect” non members as in their role as Government Agents and extensions of the criminal enterprise of Popper ET AL did and were allowed because of the prejudice, bias and criminal enterprise of their informed Superior Officers to do: fraud of church/school accounting records since about 1994; fraudulent business practices; defamation of members

and the Corporation and Townsend; made false criminal charges against Townsend in court and obstructed and tampered with witnesses of the church members and Others and impeded a jury trial in an unbiased court as “judges” and Florida Bar Executive Officers and Gov. Bush and Crist ET AL conspired in their Criminal Enterprise for Political Power and Self-dealing acts rather than follow the law assisted by “Sect” FBCCP lawyers.

The Constitutions of these United States, Florida and FBCCP By-Laws (Constitutions ET AL) require a “Fair” “Due Process” Trial without fraud to the jurors to protect against “Government Invasion” and Government Abuse of Constitutional and Contract Rights. “No law shall impede the obligation of a contract” is conveyed in each Constitution ET AL. Therefore, each Florida Bar Officer, Government Agent, Appeals Court or Circuit Court or “other courts” (i.e. Family Court) have practiced Unconstitutional Acts of “Bad Behavior” per our United States Constitution as their granting themselves “immunity”, secrecy, “self-dealing”, ownership by larceny, unjust enrichment and violations of Quantum Meruit, “detainment”, or P.C.A.’s to “impede” these Contract Rights of a Religious Group shows a continuation of the Criminal Acts and Enterprise of Appellees and “Others”. These District Courts of Appeals, Circuit Courts and “Family Courts” have intentionally ruled in defiance of Specific Orders

and Rules of Law of this Florida Supreme Court and U.S. Supreme Courts, Other District Courts and Appeals Courts and even after the disbarment of Appellants attorney Heather Gray and even this Appeal is necessary to act in proof of her filing illegal Motions to the 13<sup>th</sup> Circuit Court of Judge Cook **after** Gray agreed to stop practicing law as a condition of her Florida Bar Investigation. The Florida Bar Officers and Agents since 2003 have intentionally and knowingly concealed the Criminal Enterprise (impede “Discovery” and filings in Courts of the Church Investigation and Courts of “true data” to vindicate Appellants, intentionally produced fraud and do extortion and self dealing for payments of services not rendered) to which Appellees and “others” benefited by Gray of which Townsend reported and complained to judges in 2003 and before as the same pattern of Scruggs, Grant, Gibbs, Denny, Solomon, Turmel, Chapin, and Popper and “Others” as even this **ROBINSON id.** ruling by Judge Orfinger ET AL in 2006, has confirmed. Parent right were illegally taken by frauds and “illegal interference with custody” without hearing done by “Sectarian” Tim and Karen Jeffers and as Jeffers (Howlett, Smoak, Corbin and their Superior Officers) with Coast Guard Officer Mike Shumate ET AL “a/k/a Law Enforcers” and their “Agents” as Attorneys Gibbs and Grant ET AL and “Others” fraudulent evidence concealing their own crimes and these

Government Appellees and Co-Participants still in 2011 continue to “Extort”, “Detain”. “False Imprison” and “Obstruct” this father and his kids from “Assembly” since 09/08/1999 when Townsend per his F.S.§617 Contract FBCCP duty said to “Sectarian” Government Deputies (1) “Show me the money”; (2) Stop the building scheme frauds; (3) Stop lying to my family and Church Members; and from “Redressing” fraudulent Government Persons continuing Criminal Enterprise Acts. Even our U.S. Supreme Court has ruled when permanent loss of parental rights are involved a parent may represent ones rights as “Pro Se” even to the Supreme Court as Townsend has done even as elected as the FBCCP F.S.§617 Guardian of the Ethics of the members and Contract By-Laws of the FBCCP/CPCS. The Betrayal and frauds of Gibbs since his representations and consultations in 1991 has “impeded”, “defamed” and “deprived” Appellants paying him since same time for his implied honorable legal services for Appellants being paid by Appellees with Appellants funds by frauds. The RULING(s) of judge Cook was even on the Count of Malicious Prosecution and findings written by Judge Crenshaw and Attorney Denny on a Motion to Dismiss by Gray who at the time was in Default and by her Consent, disbarred and as the Ruling of Crenshaw included Grays acts this Florida Supreme Court ruled on and whereby disbarred Gray.

On 5/18/2011, 9:30 A.M., 5<sup>th</sup> DCA Clerk Jean advised the Order of Denial of the Verified Motion for Disqualification of Orfinger ET AL of 5/3/2011, was mailed. This again per R.O.C.P. 1.530 and 1.540 is for fraud, delay and “impeding” assisting the Criminal Enterprise as the Verified Motion for Disqualification sent by Certified Mail 4/21/2011, stamped by the 5<sup>th</sup> DCA as received 4/25/2011 but forwarded to the 2DCA and causing Townsend on 5/11/2011 to visit the 5<sup>th</sup> DCA and review the file that was incomplete due to errors by the 5<sup>th</sup> DCA. Another Timely Motion stating violations of R.O.C.P. 1.530 and 1.540 and that the Court Files were not complete per the 5/3, 5/5, 5/9 initials of these 5<sup>th</sup> DCA judges were by Certified mail sent. The Clerk advised that no further Orders from the 5<sup>th</sup> DCA have or would been done. Thereby this 5<sup>th</sup> DCA shows defiance to “Due Process” and “Constitutional Bad Behavior” attempting to continue the Criminal Enterprise and “impede” Contract Constitutional Rights of Appellants to ever have a “Fair Day in Court”. Therefore affirms the 5<sup>th</sup> DCA as Co-Participants of the Criminal Enterprise to use P.C.A’s and not issuing Timely Final Orders on all issues raised as Defenses to Government Agents illegal acts since Popper ET AL began their Shams confirms collusion to violate Appellants Due Process. Therefore this pattern is all the more proofs of which Attorney Heather Gray on 3/14/2003 was paid and

agreed to perform Appeals and Demands for Writs and “HERE WE ARE AGAIN” as Townsend and Townsend ET AL states since 1988 to alleged honorable Government Persons who are now estopped by their own frauds.

Citizens 1980 vote on Court jurisdiction never intended to give Florida Bar Members rights to violate Civil Rights, Grant Immunity to their own agents and harm or “detain” our children using our Taxes, I.O.L.T.A. Funds and Lawyers dues and FLMIC funds to perform the criminal acts as proved in this case.

**CERTIFICATE OF FONT**

I HEREBY CERTIFY that the size and style of type used in this brief is 14 point Times New Roman.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Certified Mail to Judge Canady of the Florida Supreme Court 500 S. Duval St. Tallahassee, FL 32399-1925 and to the 5<sup>th</sup> DCA at 300 South Beach Street, Daytona Beach, Florida 32114 and Heather Gray 10011 Cannon Drive, Riverview Florida 33578 and to the Capital Tallahassee Offices of Governor Rick Scott PL-05 and Attorney General Pam Bondi PL-01, The Capital Tallahassee, Florida, 32399 this \_\_\_\_\_, 2011.

---

Respectfully Submitted as for all Appellants by,  
Randall C. Townsend, Pro Se, Per F.S.§617  
P.O. Box 21, Odessa, Fl. 33556  
(941) 350-2677. See more exhibits and files at:  
[www.Judgeoneforyourself.com](http://www.Judgeoneforyourself.com)

**BEFORE ME THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED RANDALL C. TOWNSEND, PRESENTING IDENTIFICATON, WHO UPON BEING DULY SWORN AND CAUTIONED EXECUTED AND STATED IN HIS OWN WORDS AND TOOK AN OATH THAT THE STATEMENTS AND THE**

**THINGS CONTAINED THEREIN ARE TRUE AND CORRECT, TO THE BEST OF HIS KNOWLEDGE, INFORMATION AND BELIEF.**

**SIGNED: RANDALL C. TOWNSEND\_\_\_\_\_**

**WITNESS MY HAND AND OFFICIAL SEAL THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2011,**

**BY ID PRODUCED \_\_\_\_\_NOTARY**

**PUBLIC:\_\_\_\_\_**

**For all Appellants.**