

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

RANDALL TOWNSEND, individually,  
And RANDALL TOWNSEND, as  
F.S.617 REPRESENTATIVE for the  
FIRST BAPTIST CHURCH OF  
CITRUS PARK/CITRUS PARK  
CHRISTIAN SCHOOL  
Plaintiffs,

Case No.2015-CA-001928

vs.

JOHN GRANT, individually, JOHN GRANT,  
As Registered Agent of First Baptist Church  
Of Citrus Park/Citrus Park Christian School,  
JOHN GRANT, P.A., et. Al.,  
Defendants

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PLAINTIFF'S OPPOSITION REPLY TO MOTION TO DISMISS  
FILED BY DEFENDANTS JOE HOWLETT AND MICHAEL SMOAK IN  
THEIR INDIVIDUAL AND OFFICIAL CAPACITIES AS FORMER DEPUTIES  
FOR THE HILLSBOROUGH COUNTY SHERIFF'S OFFICE

COMES NOW, PLAINTIFF'S RANDALL TOWNSEND, PRO SE FOR ALL  
PLAINTIFFS AND UPON OUR OPINION AND BELIEFS STATES:

1. The Florida Constitution states, No law shall impede the obligation of  
a contract.

2. Joe Howlett, Individual, and Mike Smoak, Individual, placed  
themselves under the Sovereign Authority of our contract as the FBCCP  
Bylaws to become members as Individuals, and thus under the authority of  
Plaintiffs and Plaintiff Townsend per Townsend's Officers Position as of  
the Nominations Committee of the FBCCP operating as a Supreme Court of  
and For the F.S.617 Corporation Not For Profit and as a Religious Society

**with Sovereign Authority superseding any alleged authority these  
“masked” alleged Under Color Of Law or Under Color of Uniform.**

**3. As alias law enforcers these individuals are not members and as  
alleging to be members their Oath to uphold the Florida Constitution  
requires them to uphold and not violate or impede the duties in the  
Religious Society FBCCP Bylaws as proved Townsend has promoted.**

**4. Then acting as non-member “Masked” “under color of law” alleged  
honorable Hillsborough County Sheriff Deputies for themselves as a “Sect”  
and “Sect Agents” and others they usurped, “impeded”, did frauds and  
omissions of truthful disclosure and “obstructed” and Breached their  
Membership, the FBCCP Corporation, THE BYLAWS as a contract, Their  
Oath as Deputies to uphold the Florida Constitution and the United States  
Constitution and any now claimed defense by any lawyer for the HCSO  
Sheriff Deputies is a Tort to “impede” the Rights of the Members to do self-  
governing of our Religious Society Rights within the rules of the FBCCP  
Bylaws Contract that these deputies continue since 1994 to impede  
Townsend as their Superior Church Officer from investigation of the  
admitted 10/1994 violations of the By-Laws, Members Rights, and the Law,  
placing the Members and the FBCCP Corporation is violations of our  
Bylaws as a Religious Society and as a Not for Profit Corporation and  
victims of the “Sect” and “Sect Agents” crimes now proved per judges as  
“Hate Crimes”.**

**5. HCSO Deputy Joe Howlett, even the night of the abduction of the**

**Townsend children J.D.T. and J.G.T. in 10/1999, in collusion with others unknown, switched his schedule and worked for Randall Townsend as a F.S. 493, Security Officer Supervisor, on duty at the Citrus Park Towne Center Mall from 4Pm -1AM, just to distract and make sure Townsend did not leave the mall and go home and find his children and home being abused and abducted against their will per the hand written note of J.G.T.**

**6. Howlett, Smoak, Jeffers, Corbin and Shumate as a Coast Guard Officer, multiple times “impeded” Member/Officer Townsend from entering Worship or School Services and Business Meetings as a member is to be Free to do as they intentionally violated Townsend to defame his good name and his now proved illegal acts done by these defendants and others unknown.**

**7. Defendant Howlett and Defendant Smoak even on multiple occasions used their HCSO Vehicles with lights flashing to chase Townsend and do illegal traffic stops of Townsend around the property when Townsend arrived to attend a meeting or see his children. At these illegal detainments Townsend was even required to stand as if he was being arrested.**

**8. These defendants and their superior officers and as co-participants on May 10, 2006, were named and ruled by Judge Marva Crenshaw and their attorney at the time Charles Denny IV admitted these defendants did “Hate Crimes” and these defendants still sent HCSO Master Detective John McDarby who admitted some of these things are crimes. So how can**

**Howlett and Smoak be defended now when officers of the court have already found these named defendants “guilty”.**

**9. Judge Crenshaw and Defendants attorney Charles Denny IV, on May 10, 2006, even per the exhibit filed July 14, 2015 as the “Second Amended Complaint” as written by Judge Crenshaw and Denny IV even named “Members At Large” which included HCSO Deputy Smoak, multiple times and specifically Joe Howlett, individual, and as a Deputy, and multiple times stated “Deputies” did unlawful acts as even “HATE CRIMES” as included in Paragraph: 6; 7; 11; 27, even including defamation written by attorney Denny; 30; 31; 44; 53; 71; 73; 74; 76; 77; 79; 80; 81; 82, as defendants did their “Odious and Outrageous” action(s).**

**10. HCSO Fraud Detective Michael Smoak, in 1999-2000, admitted to Townsend as the Nominations Committee Member that HCSO had advised him as a Fraud Detective to review the FBCCP Documents that Townsend and other members demanded to see on 9/8/1999, yet Smoak prevented the review of documents by the members and falsely reported he found nothing was wrong which when partial records were revealed in 2006, by order of judge Crenshaw, multiple violations and thefts of money are discovered and confirmed by CPA Horgan as “So bad I took my kids out of the school and split my CPA firm”.**

**11. HCSO Smoak used his role in the Malicious Enterprise to conceal crimes still ongoing and to secure a paid teaching position for his wife and free tuition in the CPCS Private school for his 4 daughters.**

**12. By HCSO Deputies Howlett and Smoak, with their collusion with Pinellas Deputy Jeffers and Pasco Detective Corbin in collusion with other "Sect" members and "Sect Agents" as John Grant et al, the Malicious Enterprise and Malicious Proscution on Plaintiff's continues still at the time of this Motion for them to cease their "Hate crimes".**

**13. Defendants are estopped from claiming HCSO Deputies Howlett and Smoak and others named in the complaint and others yet unknown until discovery is complete conceal the "Hate Crimes" as they admitted and confirmed the ruling of Judge Crenshaw and Attorney Denny and "Others" as Townsend has reported in each brief in each related case at the Circuit, Appeals and Federal Level Courts confirmed.**

**14. By the FBCCP Business Meeting documents partially revealed in 2006, by the Order of Judge Crenshaw, the Parties herein were informed that Townsend was the honorable officer and still member allegedly removed but alleged removal was done by defendants as the "Sect" and their "Sect Agents" in violation of the Bylaws and the laws of the State of Florida and our Contract and Civil Rights.**

**15. The fact then to conceal their illegal actions impeding inspection of documents still ongoing and thus when partial records are seen the violations of law and rights are evident for us as Sovereign Members.**

**16. The fact then to conceal this information these deputies then caused**

**the abduction of Townsend from his children since 9/8/1999 in their assembly in the religious society and abduction from their home since 10/1999.**

**17. Attorney Olivier F. Lindemann, now for these defendants and “others doe” and others unknown now make the false and defamation of Townsend in a False Public Light, Claim in this Motion Section B. Page 4, that Townsend “*at the time the drug transaction leading to his arrest took place*” as this is another total Fraud for Defamation made now for the first time to allegedly again show frauds of defendants were justified as all their other false statements have been proved as lies that even “Townsend was dangerous with guns” intentionally falsely made in a Religious Society Meeting 4/2000 and reported timely to HCSO Internal Affairs and others, in the investigation Townsend was conducting and where HCSO deputy Howlett had no right to be in the closed meeting as a member or as an HCSO Officer and member of the “Sect” that Townsend is still trying to investigate and expose for criminal actions as judges have ruled.**

**18. The fact that Sheriff David Gee has instructed any or this lawyer to aid and abet an ongoing criminal act or act(s) per HCSO McDarby and now still obstructing and “impeding” Townsend conducting since 1994 a Criminal investigation for the members as stated above without making arrests or prosecution for the HCSO McDarby Crime(s), is proof of violations of the Florida Constitution Article 1. Section 3, and the Oath of the Sheriff and Deputies and lawyers who affirms to uphold the**

**Constitution and Citizens Rights but now still since 1994 is “aiding and abetting” a “sect” in violation of a Religious Society using tax payers dollars and even the proceeds of the FBCCP membership and Corporation Not For Profit as these same defendants produce since 1994 false records and obstruct Townsend in his per these members investigation of their confirmed illegal actions.**

**19. Defendants attempt again to assume their protection or alleged immunity they grant themselves in their Official Capacity after they received Plaintiffs proceeds illegally, specifically selected to advance the Malicious Enterprise since 11/1987, by McCarthy ET AL and then win their election or appointment to their Official Capacity and ignore Plaintiffs “knowledge of secret funds and other Florida Statute Violations....” Of defendants and others and others not yet known doing violations of law before they attained their Official Capacity.**

**20. Plaintiffs request the Court to take Judicial Notice of ALL Plaintiff’s Oppositions and Reply’s and Motion to Strike as already filed in this case and incorporate each herein and secure and include herein all case records of these related cases Townsend has filed or has defended as a respondent due to acts of their Pinellas Deputy Tim Jeffers ET AL.**

**21. Plaintiffs have well advised and documented that Others and specifically Pinellas Deputy Captain Tim Jeffers and acting as a “masked” Under Color Of Uniform Deputy as Tim Jeffers, Member, with HCSO Deputies Gary Terry, Howlett and Smoak and Pasco Deputy Corbin, with**

**their superiors per the direction of John Grant, as Registered Agent, Lawyer, Florida Congressman, Republican Committee Agent and continuing for years directing even by email to HCSO Sheriff Gee and State Attorney Mark Ober and per this Complaint still “defaming” and “maliciously persecuting” plaintiffs and illegally acting in Breach and Torts of the FBCCP Contract and using Plaintiffs proceeds illegally, since 1994 and timely served in case 02-03812 but by admitted fraud on the court by fraud of the “Government Persons” was illegally dismissed, and Pinellas Sheriffs Coats and Rice and other Deputies in Internal Affairs since 2000 and other Operations Agents even in a written Accommodation For Honest Services wrote a letter of 8/1998, with HCSO Gary Terry, and as the Superior Officer of his Fraud Detective Mike Smoak, and his HCSO Sargent Joe Howlett, and each alias “law enforcer” with Others known and unknown have knowingly, intentionally, willfully and recklessly and unlawfully “impeded” and violated Plaintiffs with “bad faith...wanton disregard....” actions causing damages that are still not yet fully known or calculated because of unlawful acts of specifically Deputy Jeffers in collusion with and for others some yet unknown because “Civil Right of Assembly” with Plaintiffs and even their children to conduct their Religious Society and other Civil Rights has been since 9/8/1999, “Under Color of Law” by non-member “Masked” Deputy Jeffers and others of his “Sect” and “Discovery” has been “impeded” even Corporation Not for Profits Records Townsend as member since 1993 and the Nominations Committee**

**Officer of the Corporation since 1994 and as Member(s) investigating 10/1994 and since admissions of By-Laws violations by Administrative Pastor Elbert Nasworthy and Senior Pastor Ron Beck and Finance Committee Members and Trustees and Deputy Jeffers ET AL and others unknown, has demanded to view as Jeffers outside of his authority and jurisdiction illegally uses “Under Color of Law” and “Under Color of Uniform and Fraud even as an FBCCP Officer in collusion with others even showing his badge to demand as a fellow officer that HCSO Deputy R. Clark to issue a Trespass Warning #07-650170 on 10/28/2007 after it was known and admitted by Attorney Denny and Judge Marva Crenshaw and HCSO Sheriff David Gee in 10/2007 at a Sickles High School Town Meeting as in this related case 02-03812, that Townsend still is the Corporation Not For Profit Officer these defendants and others unknown attempt to remove from his Official Rights per the 100% vote of the FBCCP Members as required by the BY-LAWS and the Contracts.**

**22. The Hillsborough County Sheriffs Office and the Pasco County Sheriffs Office, and the Pinellas Sheriff’s Office as an Agency and its multiple Agents continue at the directives of their Agents and of their Superior Government Persons as Governors Chiles, McKay, Bush, Crist, Scott), FDLE (Bailey, Newman, Sanz and others), Florida Supreme Court alias Judges and their agents), Attorney’s Generals 1994- A.G. Pam Bondi and past and current agents as alleged honorable legal counsel to protect citizens rights.) to still “impede” the “Free Will” Religious Society Rights of**

**Plaintiffs even to assemble with their children and others as witnesses in this case and the underlying cases as Townsend as a Respondent attempts to get his “Day in an Honorable Court” and defend himself from the Malicious Enterprise began since 1987, by McCarthy, Williams, Lane(s), Crenshaw for Publix, Popper, Chapin, Chiles ET AL. and still continuing.**

**23. Additionally, per the Transcript of the hearing in case Townsend ET AL v. Scruggs ET AL, Scruggs who alleged he was per “honorable services” for Townsend and those for whom he spoke as his children and the FBCCP, whined to Judge Stoddard that even Howletts actions in the court of judge Palomino on 11/15/2001, scared him from performing his “Honorable Services” exposing the crimes of the “Sect” and “Sect Agents” as Scruggs infers he failed to defend the causes of his clients because of the now proved false reports of alias “law enforcers”.**

**24. Joe Howlett, dressed in his HCSO Green Blazer with his HCSO Pin, even made his presence completely known in the Palomino Courtroom and outside in the hall of Judge Palomino on November 15, 2001, that he was there to testify on behalf of Ron Beck and Karen Harrod Townsend against Randall Townsend to conceal their now proved illegal “Hate Crimes” against Townsend and the FBCCP Corporation Not For Profit and the Members. By Scruggs keeping Howlett and others out of the courtroom during actual testimony and in the witness waiting room, Townsend is still disadvantaged as to know the “unknowns” also there to testify but now called because of the admitted collusion by Judge Palomino of Scruggs**

and Grant and others unknown or who as others of the HCSO as David Gee, Gary Terry and others authorized and directed Howlett since 1994 and Smoak since about 1997 to continue their illegal acts and “Hate Crimes”.

25. Per the Testimony of the Victims Assistance Agents, Curtis Baughman and Nancy Lopez, they were advised from their superior officers and yet still unknown to Plaintiffs, that they were to fully assist HCSO Sgt. Joe Howlett in his claims to defame Townsend on proved false charges that Baughman himself was advised as he sat in the Judge Palomino Court on 11/15/2001, then and now proved to be false and fabricated frauds.

26. Additionally, at the Hillsborough County, Florida Supervisors Of Elections office, on November 4, 2008, now retired but in full uniform working the election day security full admitted his even illegal actions. Plaintiffs request the court take notice of his confession posted on [www.Judgeoneyourself.com](http://www.Judgeoneyourself.com) since 2008, in full view for all defendants and their lawyers as Lindemann and previously Denny IV and Grant, to affirm and incorporate this in the record as a factual account of the admissions of Joe Howlett ET AL.

27. Per the Clerks Office and with knowledge of the Court, Defendants and others unknown are being timely served as some are fleeing jurisdiction.

28. The laws clearly state that Plaintiffs should be allowed necessary amendments to conform to the evidence that Defendants in collusion have illegally “impeded” as a Breach of Contract Rights “impeding” Plaintiffs

from protecting themselves from McCarthy/Lane/Popper/Chapin/Publix and via the Grant/Bush/Ober/Bondi/Scott ET AL Republican led co-participants for “Sect” members and non-members illegal actions putting Plaintiffs in harms way still to this day because of McCarthy ET AL and Jeffers ET AL and through the plans of Grant/Gibbs/Conner/Bush(s)/Crist/Ober/Gee/Bondi/Canady/Mel Martinez ET AL as State and Nationally REPUBLICANS ET AL still being done with Pinellas Sheriffs Agents, HCSO Agents, FDLE Agents, State of Florida Agents and Pam Bondi ET AL.

29. The Florida Torts Claims Act does not require pre-notification for Torts or for violations of Federally Protected Civil Rights as Religious Society Rights and or Parenting/Assembly with Children and Free Speech with or for Life, Liberty and Pursuit of Prosperity so therefore no statement need be in the Complaint. However other evidence does show that prior notice for years has been known and ignored by Defendants known and unknown as Defendants in the Department of Financial Services conceal multiple prior reports to them for many years. Additionally, this law would be unconstitutional as it “impedes” the obligation of a contract.

30. Defendants actions and non-actions have occurred in multiple counties especially mostly in Hillsborough County, Florida where Defendants knew their alias Deputy Jeffers conducted illegal acts “Under Color of Uniform” as a Pinellas County Sheriff Deputy with their authority.

31. Per PROSSER, LAW OF TORTS §46 (West 4th ed 1971):

**“All persons who actively participate in a tortious act, or who aid or encourage the wrongdoer in furtherance of a common plan or design to commit the tortious act, are equally liable with the wrongdoer for the act. Those who ratify and adopt the wrong doer’s act that are done for their benefit are also equally liable with the wrongdoer for the act. Traditionally, all such aiders and abettors are joined as defendants in one action and each is held liable for the entire damage.” Matthew Bender and Company, Inc. Assault and Battery 20.04**

**32. This is intentional specific behavior and therefore per Dominguez v. Equitable Life Assurance Society 438 So2d 58 (Fla. 3rd 1983) shows sufficient proof that “emotional distress arose from the act”. All judges and lawyers and a Sheriff as Officers of the Court to protect the integrity of the court are not to allow fraud in the court by the aggressor who uses the fraud to the court to abuse the victim of the acts of the Malicious Enterprise and then assault and battery the victim again by the alleged “Under Color of Law” process in a Corrupt Court!**

**33. EXXON CORP. USA v. DUNN 474 So2d 1269 states:**

**“Damages for emotional distress may be recovered from a defendant who maintains a nuisance, regardless of physical injury or impact. Annoyance, discomfort, inconvenience, and the like are the natural results of a nuisance and are thus compensable, even if the defendant did not intentionally, maliciously or recklessly create or maintain the nuisance.”**

**“Compensation for injuries that to and extent involve emotional distress may also be recovered through such acts as torts as false imprisonment, assault and battery, wrongful birth and defamation.”**

**PER FLORIDA TORTS 23.30 Each and every person and agency that Plaintiffs have tried to get help from has allowed my rights with my children and for Other Plaintiffs to be abused by the then wife/now former wife and mother as an employee of Ron Beck and Herman Meister and the Church Trustees (Howlett, Jeffers and Smith) and “alias” attorney’s and “alias Law**

**Enforcers” for the First Baptist Church of Citrus Park Corporation who acted outside the LAW and the BY-LAWS and the Florida Constitution Article I Section 3, as a “Sect” and “Sect Agents” and violated Plaintiffs as Townsend and my children and just trying to operate civilly under the Laws of Florida and of the Corporation BY-LAWS as was and still is our duty. Those who have once they got knowledge of these issues and lied to me as for all Plaintiffs and told us we had no rights, lost my rights, or had no cause of actions, or could not combine defendants and or causes of actions just to continue and protect themselves due to statute of limitations violations of due process have just continued the frauds and torts started by the criminal acts of the Officers SCHISM. CHAMPION v. GRAY 478 So2d 17 (Fla. 1985) These abusive actions at FBCCP started against our families and members in 1994, when Beck, Nasworthy, Meister, Jeffers ET AL made the pack to: 1. conceal the misuse of Designated Funds for their personal benefits without approval of the Congregation and; 2. get rid of Townsend as the Nominations Committee Member and as LRPC CHAIRMAN and member so; 3. they could pull off their “scheme to fraud” of the Master Building Plan corruption alleged as a “VISION” and started frauds about me to my wife and children and others. This is well documented in the BUSINESS MEETING MINUTES and confirmed by Affidavits from Witnesses to the intentional frauds of Beck, Meister and the Finance Committee. In 1994, my son, J.D.T was 11 and my daughter, J.G.T., was just 9 years old enrolled as students at Citrus Park Christian School**

and attending the Church. The March 24, 1996, Business Meeting Minutes state that the proposal of what the Church can do will come from the LONG RANGE PLANNING COMMITTEE that I was chairman of and then Beck and Meister and others without permission from the CHURCH body and breaking their pledge in the Business Meeting started to conspire against the plans and directives of the Long Range Planning Committee. This is confirmed by the Business Meeting Minutes finally received on June 12, 2006, for the years of by frauds Ron Beck, Herman Meister, Joe Howlett, Gary Leatherman, Tim Jeffers, John Grant and other lawyers, judges and “others yet fully unknown” and helped by Charles Scruggs, Heather Gray and Charles Denny using the wife in the Divorce Courts and frauds by these of law enforcement and attorneys to keep me away from my children and Church Appointed duties as the Positions I was GENERAL CONGREGATION VOTED INTO was never per the Laws of Florida 617 properly voted out of these Duties but for the frauds of the “pastors schism” helped by the frauds of the attorneys and family court judges.

34. Quoting Chapter 67 of Florida Jury Instructions by Richard B. Badgley, at 67.01[3]—Comment,

“The Florida Supreme Court has adopted the position set forth in the Restatement (Second) of Torts §46, which acknowledges the existence of an independent tort for intentional infliction of emotional distress.<sup>1</sup> At the same time, recovery of damages for emotional distress in a cause of action for another tort remains viable.<sup>2</sup> Damages may be recovered for emotional distress without a showing a bodily harm resulting from the emotional distress.<sup>3</sup> Examples of this include ...certain abusive debt collection practices.<sup>5</sup> Conduct that is actionable as intentional infliction of

**emotional distress may also give rise to liability for malicious infliction of emotional distress, for which punitive damages may be sought.6 67.02[3]: Abuse of real or apparent authority over a plaintiff may also rise to the level of extreme and outrageous conduct.5 Examples of Florida cases in this category include...and abuse of position by a police officer...”Per CITY OF DELAND v. FLORIDA TRANSPORTATION AND LEASING CORP 293 So2d 800 (Fla. 1st DCA 1974).”**

**35. Plaintiff request an Honorable Court to take judicial notice**

**incorporate herein all other papers and pleadings filed in this case since 1987 and before as necessary to be provided.**

**WHEREFORE, Plaintiffs request an Honorable Court to find:**

- 1. Find Joe Howlett ET AL and MICHAEL SMOAK ET AL, as individual(s) and as HCSO Deputies, and as FBCCP “alias agents” in Breach of Contracts and Default and issue a 1. form 1.917 as an individual for acts he did before becoming “alleged honorable officers” illegally receiving proceeds and Quid PRO Quo benefits and thus being retained as “Deputies” or per R.O.C.P. 1.500(e), issue a Final Default;**
- 2. Find all named defendants in the FRAP 26.1 in Default and Fraud on the Court and Contempt of Court as all have been informed and some have fled the county and State of Florida and some or all did threats to Plaintiff while litigation is pending since 1988.**
- 3. Find Counsel(s) Mr. Lindemann and others in attempting Fraud on the Court and on Plaintiffs in Contempt of Court as attempting to aid and abet ongoing criminal acts still being done by these defendants with others known and unknown.**
- 4. Deny any and all Defendants Motions as by Breach of Contracts and**

Torts or their own prior admissions or omissions they are estopped from any pleading of and defenses.

5. Find each Defendant, as did Judge Marva Crenshaw guilty of “Hate Crimes” and issue warrants for their and those who are continuing to justify their crimes, immediate arrests.
6. Order full discovery for all Plaintiffs causes to prove for trials to expose the Malicious Enterprise and damages;
6. Grant any and all Orders, restitution and full relief for Plaintiffs.
7. Rule this alias “answer” is nonresponsive and rule each Defendant is in Default as a matter of law;
8. Additionally, Plaintiffs request this Honorable Court issue an order requiring Defendant(s) to be found in Contempt of Court, Pay any and all reasonable costs and fees incurred by Plaintiffs and issue arrest warrants for their multiple criminal actions and attempts to continue “Hate Crimes” and disgrace an Honorable Court and a damaged Religious Society even by clear SLAPP violations of ethical principles detailed in the FBCCP By-laws.

Respectfully Submitted by:  
Randall Townsend, Pro Se and Per F.S.617.0834  
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FOR ALL PLAINTIFFS  
Jfyrt59@hotmail.com  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was provided this day of September 4, 2015 by hand or email or e-filing to the Clerk of the 13th Circuit 800 East Twiggs St. Tampa, Florida 33602 and by emails as follows

TVG Electronic FILING CASE NO: 292015CA001928A001HC,  
Shelley.cridlin@myfloridalegal.com;  
Christina.santacroce@myfloridalegal.com;  
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Tim and Karen Jeffers 15217 W. County Line Road Odessa, Florida 33556.

**SUPPORTING AFFIDAVIT**

**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.**

**WITNESS MY HAND AND OFFICIAL SEAL THIS \_\_4th DAY OF September, 2015,**

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

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

**Respectfully submitted,**

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