

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

PLAINTIFF'S OPPOSITION REPLY TO DEFENDANTS GOVERNOR RICK
SCOTT AND ATTORNEY GENERAL PAM BONDI'S MOTION TO DISMISS
PLAINTIFF'S COMPLAINT WITH PREJUDICE AND MEMORANDUM OF LAW

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

1. Plaintiffs served the summons on Rick Scott, Individual.
2. Plaintiffs served the summons on Pam Bondi, Individual, as service per F.S.16.01 at the A.G. office in the Capital was refused.
3. It is a violation of law for A.A.G. Cridlin, now having done multiple misdemeanors, also now here to aid and abet and attempt alleged representation of offender's Rick Scott, Individual, and Pam Bondi, Individual, in violation of F.R.O.P.C. 4-3.1, per F.S.16.07, stating:

“Attorney General may not receive fee for defending offender.—It shall be a misdemeanor in office for the Attorney General to take or receive any fee for defendant any supposed offender in any of the courts.”

4. A.A.G. Cridilin identifies, not as of the public defender's office and nor should these defendants, sued in their individual capacities be legally allowed to use the A.G.'s office for representation for allegations of the admitted Criminal Malicious Enterprise.

5. "F.S.111.07, Defense of civil actions against public officers, employees, or agents. "Legal representation of an officer...may be provided by the Department of Legal Affairs...(2) For purposes of this section, a "final judgment" means a judgment upon completion of any appellate proceedings."

In this case continuing the underlying related cases against these defendants which have been through the appeals process numerous times the Malicious Enterprise of "Hate Crimes" as intentional "Bad Faith and wanton disregard...has deprived another person of his rights secured under the Federal Constitution or laws" has been affirmed by State and Federal Appeals Courts yet even though through collusion from the same judge acting by Fraud on the Court, the cases may have been dismissed on other issues of Rules or Procedures to continue the Malicious Enterprise and Malicious Prosecution and "Hate Crimes". Rules or Procedures are not Constitutional if they violate the Obligation of a Contract Right. Plaintiffs allege this does not give allowance then for the defendants to continue to do unconstitutional acts because they grant themselves alleged illegal sovereign immunity which the U.S. Supreme Court in Keller says they are not authorized to do to violate per Salinas or Breach the Sovereign Rights of a Religious Society Contract as herein as "No law shall impede the obligation of a contract." Because alias "judges and lawyers"

are directed to agree with the Malicious Enterprise to delay Plaintiff's from their free speech and assembly with their Religious Society or a fellow jury for over 27 years.

6. Plaintiff's, notified these and multiple defendants during their campaigns, in their individual capacities before defendants as individuals even took office and advised these defendants to see www.Judgeoneyourself.com regarding illegal acts, including unlawful uses of Plaintiffs proceeds and Quid Pro Quo benefits.

7. As well as Defendants as their co-participants in the Malicious Enterprise have notified Scott and Bondi, both during their campaign and now in their Official Offices as Governor or Cabinet members, with Chief Financial Officer Jeff Atwater and Agriculture Commissioner Adam Putnam who at relevant times like their duly informed predecessors, supervise, direct, aid and abet the FDLE and the Commissioners, Guy Tunnell and Gerald Bailey and now Richard L. Swearingen, appointed since December 16, 2014, and approved by the Cabinet on January 13, 2015.

8. Defendant Scott, is to act per F.S.14.01: "...to procure and secure protection to life, liberty and property of the inhabitants of the state...". Additionally the Governor has duties per 14.26, Citizen's Assistance Office.

9. Plaintiff's allege and believe Rick Scott, individual, is in violation of F.S.768.28, SLAPP Acts as a willful participant in the Malicious Enterprise and by delay to do his duties per his Oath, knowingly allows these acts to continue and assist in the Malicious Prosecution and Tort Interference with

Child Custody, as assembly and Civil Rights of the Religious Society, obstructing our investigation of Criminal acts and defamation against us by the “Sect and Sect Agents” .

10. Plaintiff’s allege and believe the termination of FDLE Bailey and others departing the FDLE is related to the Plaintiff’s allegations and proofs of the Malicious Enterprise and Defendants have by the termination admitted aiding and abetting in the acts of Gerald Bailey and others in the Malicious Enterprise against Plaintiff’s still ongoing.

11. Plaintiff’s allege and believe then by the Governor and Cabinet terminating Gerald Bailey for cause even though since the co-participant Paul Tash and agents refuse to report the full facts known since 1994, and before then the Governor and Cabinet not continuing for the same “cause(s)” not terminating members of the Executive, Legislative and Judicial and other Officers for which they have supervision and authority as Respondent Superior then become aiding and abetting of their co-participants and vicariously liable to these Plaintiff’s for their illegal acts as even FSCt. Chief Judge Canady (2012) and judge Marva Crenshaw and the defendants attorney Charles Denny IV (2006) admitted the Malicious Enterprise and “Hate Crimes” and Tort interference with child custody since 1999 still ongoing which have no statute of limitations.

12. Per F.S. 27.151, as Directors for the Anti-Rico Task Force or F.S.27.36 Office of Prosecution Coordination or F.S.27.37 the Council On Organized Crime or other agencies both Defendants Scott and Bondi

cannot aid and abet the state attorney, or FDLE or Sheriffs or Judges or Lawyers or Florida Bar Officers or per 27.37(4)(c) with the Speaker of the House and President of the Senate to continue the RICO of the alleged Anti-Rico Task Force as FDLE Bailey was involved in running in the Malicious Enterprise against these Plaintiffs.

13. Defendant Bondi, individual per her Oath as Attorney General is to act per F.S. 16. And F.S.20.11, as head of the Department of Legal Affairs specifically as follows:

- A. 16.01(2) “Shall perform the duties prescribed by the Constitution of this state and also perform such other duties appropriate to his office as may from time to time be required of him by law or by resolution of the Legislature.”
- B. 16.015 “...shall authorize other counsel when professional conflict of interest is present...”
- C. 16.08 “...shall exercise general superintendence and direction over the several state attorneys...”
- D. 16.101 “The Attorney General shall be the reporter for the Supreme Court.”
- E. 16.53 “Legal Affairs Revolving Trust Fund.—(1) There is created in the State Treasury the Legal Affairs Revolving Trust Fund... for the purpose of funding investigation, prosecution, and enforcement by the Attorney General of the provisions of the Racketeer Influenced and Corrupt Organization Act, the Florida Deceptive and Unfair Trade Practices Act, or state or federal antitrust laws.”
- F. 16.56 “Office of Statewide Prosecution. (1)(a) Investigate and prosecute...(b)...against organized crimes...”

14. Defendant Bondi, individually, in violation of her Oath, is in violation of her duties to prosecute not defend persons in these criminal acts as Plaintiff’s herein this case have detailed since 1987.

15. Plaintiff’s allege and believe Pam Bondi, individual, is in violation of F.S.768.28, SLAPP Acts as a willful participant in the Malicious Enterprise

and by delay to do her duties knowingly allows these acts to continue and assist in the Malicious Prosecution and Tort Interference with Child Custody, as assembly and Civil Rights of the Religious Society, obstructing our investigation of Criminal acts and defamation against us by the “Sect and Sect Agents” .

16. Defendant Bondi, individually, and Scott, Individually, are in violation of their duties for Ethics in Government and knowingly in violation of Plaintiff’s Civil Rights and specifically violation of Article I. Section 3. Using state funds to assist the “Sect and Sect Agents” and even now providing those who in the Malicious Enterprise provide delay defensive legal services still assisting them in conducting illegal acts specifically named in F.S.16.56(1)(a) the A.G. and the Governor are to prosecute.

17. Defendants Scott and Bondi per F.S.23, specifically at 23.1231, (f-i) have duties to regulate FDLE activities and Sheriffs and State Attorney’s and others of the Executive, Legislative and Judicial Branches.

18. Defendants Scott and Bondi also have supervision and authority and knowledge over any F.S.69.051 Masters in chancery; compensation.

19. Defendant Scott per F.S.30. a Governor must hold Sheriffs to their Constitutional Duties. Likewise A.G. Bondi is to hold herself and her old boss, Ober to his Constitutional State Attorney Duties, not continue collusion in their roles in the Grant, exposed Malicious Enterprise.

20. Defendant Bondi per the A.G. Duties to protect Plaintiffs Rights (Hobbs Act) being violated by Federal Officers has a duty per her Oath to

protect these violations of Federal and State Civil Rights of this Plaintiff even as a Religious Society and not in collusion for the Malicious Enterprise conspire with Federal Judges, the DOJ and her friend U.S. Attorney O'Neill or others to violate Religious Society Contract Rights.

21. In the underlying related ongoing cases Defendants were even informed and reply to these issues in this case as shown below:

**“UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT
DOCKET No: 12-13892**

**RANDALL C. TOWNSEND, FIRST BAPTIST CHURCH CITRUS PARK,
CITRUS PARK CHRISTIAN SCHOOL, RELIGIOUS SOCIETY MEMBERS,
J.D.T., J.G.T., MEMBERS OF CITIZENS ET AL**

Appellants

Vs.

**HEATHER M. GRAY, THE FLORIDA SUPREME COURT AND NAMED
JUDGES AND OFFICERS, THE FLORIDA BAR, THE STATE OF FLORIDA,
GOVERNOR SCOTT, ATTORNEY GENERAL PAM BONDI, STATE
ATTORNEY MARK OBER ET AL, SHERIFF DAVID GEE ET AL, FDLE, JOHN
GRANT ET AL, PATRICIA McCARTHY ET AL, DAVID H. POPPER ET AL,
BRUCE E. CHAPIN ET AL, LINDA CHAPIN, MEL MARTINEZ ET AL,
CHARLES SCRUGGS, III, DAVID GIBBS III, CLA, CHARLES E. LANE, Jr.
CHARLES E. WILLIAMS; CHARLES E. DENNY IV; DICKINSON & GIBBONS
ET AL; JEB BUSH; GEORGE W. BUSH; RON BECK ET AL; TIM JEFFERS;
JOE HOWLETT; MIKE SMOAK; PAULA POWELL; ELBERT NASWORTHY;
NAMED JUDGES: 9th, 13th, CIRCUITS; 1st 2nd 5th DCA; FEDERAL
JUDGES TAMPA MIDDLE DISTRICT; STEVEN HARROD; KAREN HARROD
TOWNSEND; AND VARIOUS OTHERS STATED HEREIN AND “OTHERS
DOE” PER THE FILED FRAP 26.1 IN THIS CASE;**

Appellee's

**AN APPEAL FROM THE
UNITED STATES DISTRICT COURT MIDDLE DISTRICT
OF FLORIDA, TAMPA DIVISION**

**L.T. CASE NO: 8:12-CV-1198-T-17EAS
JUDGE Elizabeth Kovachevich**

**APPELLANTS OBJECTION TO ASSISTANT
STATE ATTORNEY'S ACTION TO DISMISS**

COMES NOW, TOWNSEND FOR ALL APPELLANTS AND STATES:

- 1. Since about 1988, when Townsend’s former attorney Patricia McCarthy abruptly and negligently abandoned her clients, Townsend and his family and his new company Future Marketing and she joined in collusion with Orlando Attorney David H. Popper and the law firm of Austin, Lawrence and Landis and then she joined the States Attorney’s Office as an Assistant State Attorney those inside the States Attorney’s Office and these named defendants and “Others Doe” have been knowingly and intentionally negligent in conspiracy to not do their duty and “Honest Services” and since 1987, not even obeying the law or even the Order of this Court and Other Courts as they intentionally and knowingly and recklessly acted in collusion and “ineffective services” under Mark Ober and his predecessors and co-participants including now his agent (Bondi) formerly of the State Attorney’s office and now Attorney’s General Pam Bondi who herself continues to refuse Due Process after being lawfully informed since about 2001 or before and at various times lawfully served personally, as the Attorney General and as the Superior Officer of the States Attorneys.**
- 2. These Appellee’s are per the law are estopped from any defense or of their claim now and or as their agents have even admitted negligence and torts of their prior lawful duties of services to have been provided since 1987.**
- 3. A major question at law as the “Mistake of Law” in this Appeal is that the “alias” “law enforcers” who per this court in the 2008 ruling “ineffective services” have acted in collusion to conceal the malfeasance of the “ineffective counsels” in that it was the scheme of David H. Popper to join with the Bruce Chapin law firm with then their scheme to protect the firm to transfer the case from Seminole County to Orange County thereby gaining the leverage and Quid Pro Quo Political powers of Linda Chapin protecting the law firm of her husband when it was revealed their new associate, David Popper had the “alias” “law enforcers” who per this court in 2008 ruling “ineffective services” have acted in collusion to conceal the malfeasance of the “ineffective counsels” in that it was the scheme of Attorney David H. with Patricia McCarthy done “ineffective services” to Townsend since 1987, telling him to “Do not do business” that may conflict with lines or accounts or agents or contacts that Lane/Sabal had or alleged to have prior to August 7, 1987. When it was later in or about 1989 learned Townsend never had to abandon or lose any business the losses of business was extreme as stated by Bruce Chapin in the written “Plaintiff’s Response to Motion to Compel Settlement” dated July 24, 1991, Exhibit “A” attached. All statements by Attorney Chapin are incorporated herein as to the amount of damages and deprivations Townsend and those for whom he speaks still suffer by the attempt of Appellees to continue to at all**

costs defame Townsend and use extrinsic fraud to conceal the original frauds of Lane and Williams and negligence and then torts of these now as Appellees and "others DOE". Facts reveal after filing this, and obtaining additional limited production that Bruce Chapin enlisted "Others DOE" to the scheme to scam Townsend all the more even including that Judge Rom Powell expanded the alleged non-compete against Townsend that when after 1993 the production showed that Lane had done fraud to induce Townsend into the contract as Lane claimed to all he had contracts he never owned or that these contracts had expired and were not renewed until these Companies as Bonneau Sunglasses knew of Townsend's abilities with the clients that Lane had been kicked out of talking too,.

This is the issue the 5th DCA in their ROBINSON v, Weiland, ET AL 5D05-2380 RULING in 2006, realized as the intentional, knowingly, reckless act of fraud was not just a "Mistake at Law" of the Powell Court and the previous 5th DCA ruling as a P.C.A. and then confirmed as the ruling of the Florida Supreme Court continuing in collusion all as an Extrinsic Fraud and Fraud on the Court just as Townsend had pled since about 1991 to Chapin and his co-conspirators. This then is the confirmation and proof that judges are in collusion with "Others" as the "Government Veil" as Townsend alleged in the arguments made in his previous briefs presented since 1993 and before.

4. This action as a Motion to Dismiss by the State Attorney is another attempt at Fraud to conceal their prior Frauds and defiance to or on this 11th Circuit Court of Appeals even ruling En Banc and the proper Rule of Law and a Fraud "Under Color of Law" violating "Due Process" and as Extrinsic Fraud on Appellants that somehow these in this case since 1987 in the State Attorney's Office now under the care and supervision of Mark Ober and now his Superior Officer Pam Bondi are not in collusion to not do their Government Persons Duty and also to conceal by fraud their own intentional acts since about 1994 to conceal the embezzlement, unjust enrichment, extortion, and multiple other felonies done to innocent Religious Society members in violations of our By-Laws as a conspired tort action. Additionally this act amounts to Extrinsic Fraud, Intrinsic Fraud and Fraud At LAW attempting to keep these victims from their day in our court or in our own By-LAWS religious assembly to show their deprivations and emotional distress caused by these torts of these Mens Rea acting co-participants acting in collusion since 1987 as they continue to conceal the illegal scheme and money trail of kickbacks and illegal Quid Pro Quo payoff to do fraud and defraud and do the RICO Acts of Lane ET AL. This includes even concealing acts by Lane's father and his Publix Supermarket business associates to use the assets of Publix to support the political enterprises of several political candidates campaigns and "Others Doe" as named herein and as exposed by these years of discovery albeit "impeded" illegally by these lower courts and others.

5. At multiple times since, these in the State Attorney's office, Attorney's Generals Office and Public Defenders Office and other multiple

State, County and Federal Officers have been dutifully advised as a victim is to do by calling "911" or by other written papers, verbal personal and telephonic visits or court filings or even in the FBCCP Business Meetings which reprimanded and then even lead to the votes of termination of the "alias" clergy and other employees of FBCCP and CPCS as members advised and advise our Government employee's of how to serve victims of criminal acts. Victims are not by then our own Government persons to become more victimized and taken and detained from our children, property and Civil Rights.

6. Defendant Joe Howlett since 1994, "deceptively" acting as a Hillsborough County Sheriff Deputy and "alias" Trustee of the First Baptist Church of Citrus Park per the employees of the State Attorney's office is the Sheriff Deputy in 2001, acting in collusion with HCSO Detective Smoak, Pinellas Deputy Jeffers, Pasco Detective Corbin, who with "Others DOE" as "alias law enforcers" specifically as the State Attorney's office persons and agents admitted since 2001, filed false reports to them which cause the charges with even Federal law violation implications and defamation against Townsend just to continue their State Attorney's and "Others DOE" false claims. Also Joe Howlett has for his intentionally not providing "Honest Services" has been unlawfully rewarded by Quid Pro Quo actions of this same State Attorney's office and agents and "Others DOE" now all as Appellee's.

7. Other Townsend ET AL, attorneys as Charles Scruggs and Heather Gray and possibly "Others Doe" have also received "visits from fellow Government alias law enforcers", information, service, Summons, Notices to Appear and rulings from Courts in this ongoing matter since 1987.

8. Exhibits already filed with this Appeal in this Court as the e-mails from Former Senator John Grant as also the Registered Agent of the FBCCP admitting he was legally served and even Grant gave notifications to the State Attorney Mark Ober and his agents asking Mark Ober himself and his agents to investigate Townsend and prosecute Townsend resulting from and including all matters of the ongoing lawsuits in this action since 1987. By the actions of multiple "Visits" by the HCSO Deputies, Threats from Attorneys working for the State Attorneys Office, Threats and false accusations made by other in the State Attorneys office as their "Acting Agents" and rulings by Judges including this EN BANC Appeals Court and the Florida Supreme Court Chief Judge Charles Canady. The Florida Supreme Court Chief Judge being fully involved and informed since about 2004 has knowingly "impeded" the legal rights of Townsend and those for whom he speaks and the Florida Supreme Court has continued their "Veil of Corruption" by failing to expose, prosecute and litigate per the law themselves and "others" under their supervision now exposed as Townsend alleged since about 1988, these defendants collusion to conceal the criminal acts of Lane ET AL as it was the agreed duty of Heather Gray ET AL to expose in the services she agreed to perform in appealing and litigation of all issues. The Florida Supreme Court and "Others" being fully

informed in Townsend's Amicus Briefs and other papers to the Courts and the Florida Supreme Court and their co-participants failures to allow the Gray torts against Townsend ET AL and to not prosecute Gray and those whom she concealed is proof of additional RICO Acts by defendants.

9. Due Process Rules show that as a Pro Se acting *informa pauperis* in the lower cases it is the duty of the Court Clerks to notify all parties and since about 2001 and or before these State Attorneys Officers were even present in the court of Judge Palomino on November 15, 2001, and heard reprimands by Judge Palomino of and for the criminal acts done by the State Attorney's Agents and their client Karen Harrod Townsend and Ron Beck and Joe Howlett and Others DOE who were knowing in the court with the intentional criminal negligence torts being aided and abetted by collusion with retained and fully paid attorney Charles Scruggs acting without full disclosure of his work for the State Attorney's Office and the court, in collusion with the State Attorney's Agents and Office and Judge Palomino and "Others DOE" to extort, threaten and keep Townsend unlawfully detained from his children, his Civil Rights, his Duties as the Superior Officer of the FBCCP investigating criminal acts of Government Persons and Ron Beck and "Others DOE" and protecting Townsend from the loss of his business incomes since 1987.

10. Additionally, in this since 1987 ongoing case an issue now again before this court in this Appeal is that as lawfully alleged and now proved as stated in the underlying connected case as TOWNSEND ET AL V. BECK ET AL Case 08-10721, Federal Judges Merryday, Wilson, Kocachevich and Others, ruling in this case are also in collusion and fraud and knowingly, willfully and intentionally have dismissed this case prior to discovery as required even as the state guidelines required with even the original Townsend v. Lane 659 So2d 720 (Fla. 5th DCA 1995) Case being the standard as stated in Robinson v, Weiland, ET AL 5D05-2380, to connect the facts of the illegal acts even done by Mark Ober and other Government Persons as specifically named and connected in this case and with "Others DOE" intentionally acting in collusion and frauds with these other Defendants doing their collusions for "Fraud, Collusion and Arbitrariness" to protect themselves, co-participants and their superior officers since 1987 by various Bad Faith and Unjust Enrichment and Quid Pro Quo acts.

11. On October 24, 2012, Townsend for all Appellants based on the illegal "visit" of HCSO Deputies to Townsend on October 10, 2012, outside their jurisdiction of Hillsborough County and their "threats" to stop contacting or filing legal papers to John Grant and his co-participants this Appeals Court was sent Townsend ET AL's Motion to Supplement Brief and Motion for Habeas Corpus not knowing of the Motion to Dismiss of Assistant State Attorneys fully informing these HCSO Deputies as their actions were directed and approved by the State Attorney Mark Ober and "Others" it appears per FRAP 27 Subdivision (c) under 28 U.S.C. 2253: "A single judge may issue a certificate of probably cause" but in this case our EN BANC Court has already ruled "ineffective counsel" and thus shows as

should have these in the State Attorneys office knowledgeable of criminal acts by these ineffective counsels this State Attorneys Office also used as “agents” and co-participants in their “ineffective services” even those of attorney Heather Gray who herein this case is named as these victims attorney and by whom the Florida Bar, 2nd DCA, 5th DCA, and Florida Supreme Court brought charges and had disbarred as it shows her pattern of abandoning and doing frauds to her clients aided and abetted these of the States Attorneys Office and “others” allegedly as our “Law Enforcers” continuing to ignore the criminal acts of their co-participants and those violations of laws and Black Law Rules and Due Process even by themselves as admitted by the 5th DCA finally in 2006, Judge James Moody Jr. March 15, 2007, Judge Crenshaw in 2006, Judge Charles Canady in 2011, and even this Honorable Appeals Court in 2008 and confirmed EN BANC showing these in the States Attorney’s being negligent and now again trying to ignore the Opinion of this Court that “ineffective services” aided and abetted criminal acts against these still victimized Appellants.

12. Additionally, As a Respondent in cases 01-15813 and 01-15814 brought by Ron Beck and Karen Harrod Townsend intentionally and knowingly and recklessly assisting themselves and “Others DOE” including these persons in the State Attorneys Office guilty of negligence and torts at that and up to that time, Randall Townsend fully advised members of the States Attorneys Office within days of Curtis Baughman, Agent in the Victims Assistance Program of Mark Ober State Attorney and then fully informed others as Chuck Holland and Bob Petchen (SP) and Nancy Lopez at relevant times of those inside the State Attorney’s office who continuing the aiding and abetting of criminal acts.

13. Additionally, in the 2007, meeting with HCSO Major Gary Terry and HCSO Corp. Renato Martinez, they admitted mistakes had been made and their collusion with the State Attorney and Judges to not let Townsend investigate or present his case. Curtis Baughman even admitted assisting Karen Harrod Townsend at the demand of Sheriff Deputy Joe Howlett in the writing of her affidavits filed with the Palomino court in cases 01-15813 and 01-15814 and was immediately informed that the testimony, affidavits and actions by Attorney Charles Scruggs was a FRAUD ON THE COURT. As now it is known and proved even by the admissions of Judge Palimino on January 4, 2002, admitting Scruggs did malpractice and now we know intentionally giving frauds to Townsend intentionally ignoring his clients rights and demands of November 12, 2001, to Subpoena Beck to produce the FBCCP and CPCS Business Records that until 2006, in collusion to conceal their intentional McKay, McCarthy MacKay schemes the FBCCP and CPCS records were only partly produced showing By-Laws illegal acts and criminal acts confirming as Townsend is proved the Honorable Supreme Court still active member as alleged since 1994 and estops all Appellees due to their frauds and other crimes proved over and over...

14. The State Attorney’s Agents cannot at any time since 1987 claim ignorance of this case and their negligence and torts to do Exparte and

Extrinsic Frauds in this case..

WHEREFORE:

- 1. This action as a Motion to Dismiss by the Assistant State Attorney must be denied.**
- 2. Appellants make a claim for costs and fees for the costs of defending this action of frauds by Appellee's since 1987,**
- 3. Appellants make a claim for compensatory and Punitive Damages as this Motion to Dismiss shows the intentional Mens Rea to do "ineffective services" to victims these Government Persons are to serve and protect.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Appellants' Objection to the Action for Dismissal by the Assistant State Attorney letter has been furnished to: Assistant State Attorney Mark Dunn Tallahassee Florida; Heather Gray at 10011 Cannon Drive, Riverview, Florida 33569; Judge Kovachevich, Tampa Federal Court at 801 N. Florida Ave. Tampa, Florida 33602; John Grant at 10025 Orange Grove Drive, Tampa, Florida 33618; Sheriff David Gee at HCSO 2008 E. 8th Ave Tampa, Florida 33605; State Attorney Mark Ober at 419 N. Pierce Street, Tampa Florida; U.S. Attorney Robert O'Neill at 400 N. Tampa, St. Suite 3200 Tampa, Florida 33602; as Prejudiced, Biased, lower court representatives "A.K.A" Government Agents" for all Defendants still "Under Color of Law" "Frauds" ignoring contracts and "DUE PROCESS" "Impeding" and "Detaining" Plaintiffs, this ___ Day of January 2013, by regular first class USPS mail.

**Respectfully submitted by
Randall C. Townsend, PRO SE
P.O. BOX 21, Odessa, Florida 33556
(941) 3502677
Jfyr59@hotmail.com
www.Judgeoneyourself.com
F.S. 617.0834 Representative for all Appellants"**

22. Both Rick Scott and Pam Bondi were served in this related case and as proof Defendants instructed and Assistant State Attorney Mark Dunn to illegally act as presented above and thus duly advised of criminal actions still ongoing in the same Malicious Enterprise which continue the running of the statute of limitations.

23. Plaintiff's ask the Judge of an Honorable Court to take judicial notice of all related documents filed in these cases since 1987, and incorporate them in Plaintiffs proofs of this cause, herein.

WHEREFORE: Plaintiffs request an Honorable Court to find:

- 1. Find Rick Scott individual, and Pam Bondi, individual in Default and issue a 1. form 1.917 as an individual for acts he/she did before becoming “alleged Governor or Attorney General” illegally receiving proceeds and Quid PRO Quo benefits and thus becoming “Governor or Attorney General” 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 1987.**
- 3. Find Counsel(s) Ms. Cridlin 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 defenses.**
- 5. 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 this 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.

Respectfully Submitted by:
Randall Townsend, Pro Se and Per F.S.617.0834
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941 350-2677
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 14, 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; Celia.wright@myfloridalegal.com; khornbee@hcsotampa.fl.us; olindema@hcsotampa.fl.us; FLservice@gtlaw.com; trammellc@gtlaw.com; moodym@gtlaw.com; richardb@gtlaw.com; lgustofik@pcsonet.com; dconnolly@pcsonet.com; araymond@dglawyers.com; cdenny@dglawyers.com; corourke@dglawyers.com; scruggspa@aol.com; kkharrod@gmail.com; kjeffers@citruspark.org for 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 IDENTIFICATION, 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 14th DAY OF September, 2015,

BY ID PRODUCED _____

NOTARY PUBLIC: _____

Respectfully submitted,

Randall C. Townsend, Pro Se and Per F.S.617.0834
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