

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

CASE NO: __15-CA-1928__

TOWNSEND, RANDALL vs GRANT, JOHN ET AL

RELATED CASES: 06-6005; 05-9605

05-0911; 02-4974; 02-03812; 01-15813; 01-15814

RANDALL TOWNSEND, Individual, RANDALL TOWNSEND AS F.S. 617 Representative for the
FIRST BAPTIST CHURCH OF CITRUS PARK/CITRUS PARK CHRISTIAN SCHOOL

PLAINTIFF(s),

v.

JOHN GRANT, Individually, JOHN GRANT, AS REGISTERED AGENT OF FIRST BAPTIST CHURCH
CITRUS PARK, JOHN GRANT, P.A.,

DAVID GEE, Individually, DAVID GEE, AS SHERIFF OF HILLSBOROUGH COUNTY, Florida, THE
HILLSBOROUGH COUNTY SHERIFF'S DEPARTMENT (HCSO), JOE HOWLETT AS A HCSO DEPUTY,
MICHAEL SMOAK AS A HCSO DEPUTY,

THE VARIOUS MEMBERS OF THE CORPORATION d/b/a, FIRST BAPTIST CHURCH OF CITRUS
PARK, CITRUS PARK CHRISTIAN SCHOOL, A MINISTRY OF FBCCP, DAVID FERGESON, Individually,
DAVID FERGESON, AS SENIOR PASTOR OF FIRST BAPTIST CHURCH OF CITRUS PARK, RONALD L.
BECK, (a.k.a Ron Beck) INDIVIDUALLY, REVERAND RONALD L. BECK, AS SENIOR PASTOR, OF
FIRST BAPTIST CHURCH OF CITRUS PARK, (Hereinafter as FBCCP) ET AL...

DEFENDANTS,

PLAINTIFFS VERIFIED MOTION

FOR DISQUALIFICATION OF JUDGE REX BARBAS

COMES NOW Plaintiff Randall Townsend , Pro Se and per F.S. 617.0834 and states:

1. Pursuant to Fla. R. Jud.Admn 2.060, and 38.10, Florida Statues, Plaintiff requires the disqualification of Judge Rex Barbab as assigned to this cause and further states:
2. The movant is a party to this cause.

3. The movant believes that he will not get a fair trial or in hearings in previous matters of this cause because of the judges bias and prejudice in favor of counsels previously hired by this movant.
4. The movant believes that he will not get a fair trial as Rex Barbas, individual, and judge Rex Barbas are co-defendants in this cause.
5. The movant of his opinion and others, believes that Rex Barbas ET AL has willfully, knowingly and recklessly participated in intentional acts of “intrinsic”, “extrinsic” and “Fraud on the Court” allegedly acting “Under Color Of Law” but disrespecting and ignoring the U.S. Constitution, The Florida Constitution, THE Black Law Rules, The R.O.C.P. and the Civil Rights of movants herein without just honorable cause but just to continue illegal acts since 1987, as follows:
 - A. Wrote his Order of Dismissal in the underlying case 02-03812 to prevent discovery of criminal acts and justice for movants;
 - B. Backdated his Order of Dismissal in the underlying case 02-03812 despite the words in the last hearing with the judge that he would advise counsel and movant of his decision as confirmed by the letter of 9/11/2007, by Defendant’s counsel Charles Denny IV;
 - C. Concealed causes for which Judge Marva Crenshaw recused herself in the underlying case ignoring the law and motions filed by movant herein for Judge Crenshaw and others to show cause why per F.S. 38.10 she recused herself despite Judge Crenshaw rewriting the Complaint that judge Barbas then dismissed without cause or just explanation;
 - D. Concealed causes for which all his co-defendants started, continued and still acts for their RICO crimes to abduct movant Townsend illegally from his children and Church Duties since 1999 and to prohibit Townsend from uncovering and reviewing the financial records from Lane ET AL and from the First Baptist Church Of Citrus Park Baptist Church and Citrus Park Christian School by which Townsend has a contract with specific rights ignored since 1987.
6. Wherefore, this movant demands that judge Barbas immediately answer per F.S.38.10 all of his knowledge as to his role in this case as to who advised him to illegally dismiss the case 02-03812 in 2007 and why said underlying cause was dismissed and that judge Barbas recuse himself as judge of this continuing proved legal cause since 1987.

Certificate of Service

I hereby certify that a copy of the foregoing was by U.S. Mail sent this day of 3/5/15 to the Clerk of the 13th Circuit and to Judge Rex Barbas Chambers J-512 @ 800 E. Twiggs St Tampa Florida 33602.

SIGNED _____

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 ____ DAY OF _____, 2015,

BY ID PRODUCED _____

NOTARY PUBLIC: _____

Respectfully submitted,

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

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FOR "ALL" PLAINTIFFS Jfyrt59@hotmail.com

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