

**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 FDLE ANSWER AS A MOTION TO DISMISS

AND MEMORANDUM OF LAW

**Plaintiffs, Randall Townsend, and Randall Townsend as elected
F.S.617, Representative, state:**

BACKGROUND

**By the admissions filed with this court in the Motions to Dismiss and
the non responses to Summons void of defense by Co-Defendants the
Breach of Contract(s), Breach of Fiduciary Duty, Tort Violations of Federal
and State Laws and violation of F.R.O.P.C. 4-3.1 (Prohibiting attorney from
bringing or defending a suit.) have been proved as the rulings of the 11th
Circuit Court of Appeals and the 5th DCA Robinson Case show the
Malicious Purpose of Defendants and "Others DOE". If the lawyer, Bruce,**

and Linda, Chairperson of the Orlando County Commission (Chapins) fail to answer the Summons; Charles Denny IV, lawyer for Deputies Howlett, Smoak (Hillsborough County); Deputy Jeffers (Pinellas County); Deputy Corbin (Pasco County) admits the crimes; Mark Ober, individually, fails to answer the summons; Chief Judge Canady admits the crimes; Judge Marva Crenshaw admits the crimes; the 5th DCA admits the Chapin/Judge Powell/5th DCA/Florida Supreme Court (with judges having not taken their timely Oaths) crimes; then the multi-jurisdictional required duty of the FDLE Bailey and Sanz and others, knew to stop crimes is now affirmed.

1. The Continuing Defendants “Bad Faith”, “the 6 elements of malicious prosecution purpose” and “the levels of the types of malice” as “shortly and plainly” are started on Page 5, ¶6 as Defendants “violated keeping to their fiduciary duties to allow Plaintiff to reveal his knowledge of the “secret funds” and other Florida Statue Violations by the defendants- these members at large and others because co-conspirators and did extort to damage the character and reputation and unlawfully abducting the children and properties of this plaintiff... to continuing offering known false testimony in said case(s) of malicious prosecution ” conceal by ongoing Under Color of Law frauds from the citizens of this state that since 11/1987, and FBCCP/CPCS Members since 10/1994, Defendants aided and abetted Townsend/Future Marketing’s “Joint Venture” (JV) Business Partner Lane/Sabal ET.AL. found to be Drug Dealer and found to have created, induced and obtained (8/7/1987) the “JV” by

frauds and attorneys (McCarthy, Williams, Popper, Chapin, Gibbs, Grant, Scruggs, Gray, Denny and Others) in collusion with Judge Powell and “Others” withheld contracts and knowledge of torts from Townsend until about 1992-since and did torts to Townsend to cause him loss of his business and defendants assisted Lane ET AL in his RICO Organized crimes to obtain money by threats for Publix Executives who in turn unlawfully enriched politicians and “alias” law enforcers (Governors, AG’s, Legislators, Congressmen, Commissioners, Judges, and Linda Chapin wife of Townsends Attorney Bruce Chapin, etc.) and they and even these that file or allow these Motions to Dismiss are still illegally defaming Townsend and his legal positions as: “No law shall impede the obligation of a contract”; and the Florida Constitution’s Preamble also states “ ...and guarantee equal civil and political rights to all...”.

- A. “Fiduciary Duties”-Disobedience to the Truth of our Contracts;**
- B. “Secret Funds”-Of Lane ET. AL., IOLTA Funds, Publix extortions, Lawyers/Politician and Others Benefits, FBCCP/CPCS and misuse of designated funds all issues the Florida Legislature and Courts confirm are crimes;**
- C. “Florida Statue violations”-Ignoring and Breaching: Rules of Civil and Criminal Process and State and Federal Law; and doing RICO (Fla. Bar/FLMIC), Felonies and Misdemeanor’s which are elevated because of violation of Rights of a Religious Society;**

D. “Levels of Damages to show Malice Types”: Delay, Frauds by “alias” law enforcers to their clients and Citizens even trying to obtain self-enriching “Sovereign Immunity” as they delay to continue these same Frauds at Law and Frauds on the Court and Citizens since 1987.

2. Attorney Gray (2009, Disbarred) was retained to assist Attorney Scruggs since about 2/2003 and by Townsend et. al. to advocate all Townsend et. Al. legal causes and first sued in Townsend e.t. a.l. v Heather Gray, individual, Heather Gray, Attorney At Law, and Heather Gray, As a Professional Association Case 06-0065, 13th Circuit per the transcripts 2 times found in Default by Judge Gomez and one time per Judge Padgett and the Clerk and allowed to be Pro Se even after admitting Guilt to the Florida Bar for:

4.4 Lack of Diligence; 6.2 Abuse of Legal Process; 9.22(c) a pattern of misconduct; 9.22 (d) multiple offenses; 9.22 (e) bad faith obstruction of the disciplinary proceeding by intentionally failing to comply with rules or orders of the disciplinary agency.

Additionally, Judge Cook allowed Gray illegally Pro Se to represent herself as her P.A. as a Corporation and until the ruling of the 11th Circuit Court of Appeals in Case 8:12-cv-01198-EAK-EAJ, Appeal NO.12-13892AA filed April 1, 2013, the courts Denying Rehearing ENBANC, these consolidated continuing case(s) Defendants and Others, continue their RICO Frauds, Crimes and Damages and “impeded” this cases return to the

lower courts in the 18th and 9th Circuits and as now in the 13th Circuit. Until the April 1, 2013 ruling based on the prior rulings of the 11th Circuit court of appeals on the issues of lawyers malfeasance, Townsend could not anticipate or know how Gray ET.AL. would be decided in connection with their prior findings in the related cases even back to Lane ET. AL. now based on the New Evidence even learned from ROBINSON per the 5th DCA.

3. In Contact Law a Breach of Contract estops the party in breach from any defenses.

4. Defendant(s) Mark Ober, Individually served 6/24/2015 and Bruce and Linda Chapin upon being served individually, 6/25/2015, have failed to answer their Summons in Plaintiffs opinion as admission of Plaintiffs allegations regarding their actions and their co-participants.

5. “Florida Constitution Article II. Section 8. Ethics in Government.--The people shall have the right to secure and sustain that trust against abuse. To assure this right...Any public officer or employee who breaches the public trust for private gain and any person or entity inducing such breach shall be liable to the state for all financial benefits obtained by such actions. The manner of recovery and additional damages may be provided by law.”

6. Defendants cannot aid and abet “drug dealers” and RICO Organized Gangs Members in violation of Federal Laws and State Laws and Public Trust since about 1987 that Townsend has reported and then blame Townsend for delay or frauds.

7. Townsend again advised these defendants in Townsend ET AL v GRAY ET AL as follows:

¶ 7. Per the pattern of Defendants Mens Rea Criminal Enterprise as a failure to provide “Honest Services”, Bruce E. Chapin ET AL with and for his wife Linda Chapin, his law firm and law partners of O’NEILL, CHAPIN, MARKS, LIEBMAN & POPPER, P.A. with John Harkness and John Berry and Governor Lawton Chiles and Governor Buddy McKay and “others” aided and abetted and grant immunity to themselves and “others” who aid and abet the malfeasance of David H. Popper, Esquire, Charles E. Lane Jr. and David Gibbs III since 1991 and John Grant, Jeb Bush, Ken Connor and others “DOE”[including newly discovered Charles Canady and family] since about 1994 and through Attorney Gray being disbarred but still unlawfully before and with Judge Cook was protecting the sham on the Florida Citizens with “others Doe” and are knowingly joined, instructed, aided and abetted by Defendants to do: crimes; use a 1988 “Sham” Counter-suit Williams, as Lanes Drug Buddy/attorney filed, through 2001 and 2002 as the Case went to the U.S. Supreme Court and through 2011 filing more “Sham” Claims and illegal Operational nondiscretionary actions and “arbitrariness actions” by co-participants and “others Doe” acting through and with alleged “Clergy” Ron Beck ET AL and “alias Law Enforcers” as a sect with sect agents for “false public light Defamation” (01-15813 unlawfully

claiming Repeat Violence) in conspiracy with the estranged and deranged wife Karen Harrod Townsend ET AL (01-15814 claiming unlawfully Domestic Violence) and a divorce action (02-4974) for intrinsic and extrinsic frauds by their McKay/Chiles Revenge Plot with co-participants for a criminal enterprise plot as an extortion, larceny, detainment and Malicious Prosecution against Townsend for Defendants concealing intentionally illegal acts/omissions Attorney's (Gibbs, Grant, Scruggs, Gray, Denny and others) were paid to expose and whose case was not finalized at the 11th Court of Appeals ruling EN BANC until 4/2013, concluding now again as their prior findings the disbarred Gray was part of the original "negligence of multiple conspiring attorneys" including GIBBS/Grant/CONNER ET AL and "Others DOE" [Including others {Canady} retained by Governors, FDLE, FSCt, JQC, etc.] of not exposing: Lane; Lane's Attorney, Charles Williams, Jr.; Townsend's Attorney, David H. Popper ET AL and David Gibbs III and Attorney Bruce Chapin ET AL and Charles Canady conspiring with Florida Governors, Judges, Florida Bar Officers and Members and others as some named herein and "others Doe" [hereinafter "CHAPIN ET AL"] to conceal their illegal acts/omissions as "McKay Plot" "Under Color of Law for an attempt to fulfill an employment-related duty per Hennagan v. Dept. of Highway Safety 467 So2d 748, 750 (Fla. 1st DCA 1985 affirming Vicarious Liability as Defendants per KAISNER V. KOLB 543 So2d

732, 1989 Fla. SCT 2682 who supervised co-participants abusing Plaintiffs by: "Failure Of Honest Services"; Omission(s); Fraud(s); Unjust Enrichment; Illegal Political Gain; R.I.C.O Acts/omissions violating "DUE PROCESS" as the U.S. Supreme Court per Swann v. Charlotte-Mecklenberg Bd. Of Ed 402 U.S.1 (1971 gives this Federal Court (And State Court per 1.540 and other F.S.) broad powers for Equity and Relief for all these Plaintiffs deprived and still damaged because of the criminal enterprise now admitted by: F.S.Ct. Chief Judge Canady including himself; 11th Circuit Court of Appeals; 5th DCA judges; Judge Crenshaw(2006) and "Others"; and these as Chapin ET AL and "others Doe" who continue to defame and deprive Townsend in a "False Public Light" to conceal their Mens Rea Legal Malfeasance, Crimes and Lack of Honest Services and Lack of Immunity to Townsend and or as Townsend ET AL since Acts in 1987, are still ongoing by these co-participants and "others"....

8. Paragraph 74. On Page 20 of the complaint clearly alleges and connects to all Defendants a Cause of Action of "ODIOUS AND OUTRAGEOUS ACTIONS BY THESE DEFENDANTS DONE WITH MALICIOUS INTENT TO ALLOW THESE DEFENDANTS TO CONDUCT THEIR FRAUDS TO THIS PLAINTIFF, PLAINTIFF'S FAMILY, THE COURTS AND TO THE CITIZENS OF HILLSBOROUGH COUNTY AND OF FLORIDA."

9. And Paragraph 80. Page 23, states, "Defendants here is unable to

establish that the original proceeding was instituted and prosecuted on the good faith of legal counsel... or responsible attorney of law...or that the Defendant is or represents...state agency that is immune from liability for causes of action in tort.” As all defendants Malicious Prosecution acts are torts to “impede” contracts Townsend ET AL has with all Defendants.

...¶8. Townsend as for all Plaintiffs acts to protect The State Of Florida and all citizens as from illegal government persons acts/omissions and “Hate Crimes” violating Secured Contract Rights and from “Risks” stated per The 1992 American Bar Association’s McKay Commission Report addressing and exposing the agenda of the: Buddy McKay; Chapin(s); Chiles; Harkness; Berry; Bush(s); Crist; FDLE; A.G. Pam Bondi; Florida Supreme Court Judges; 5th DCA, 2nd DCA, 13th Circuit Court, Judges; The Florida Bar Officers with “others Doe” political criminal enterprise [hereinafter as the “McKay Plot”] as warned as a “Risk” to citizens by the U.S. Supreme Court’s unanimous ruling in Keller v. State Bar of California 496 U.S. 1 (1990) that a State Bar shall not immune itself by selective applications of its rules and acts/omissions to promote its own: agenda; political purposes; and or criminal enterprise; using: Chapin ET AL as with Harkness; Berry; Bar Members; Governors; “alias Law Enforcers”; and “others” as their agents to violate Federal Criminal Laws, “Other Laws” and Government Programs, Tax and Election Laws and detain and violate the

Constitutional Rights of non Bar members and “Others”. Or as in this case now admitted by F.S.Ct. Chief Judge Canady and “others” and proved used and still uses its own “agents” of the illicit relationships for these 1987-ongoing “McKay Plot” crimes “Under Color of Law” violating “Due Process” and Legal Rights protected by: Our Contracts; The U.S. Constitution; The Florida Constitution; FBCCP By-laws; Civil Rights Act of 1964 and Section §1983 of Title 42, U.S.C. stating:

“...which provides that any person who, under the apparent authority of state law, deprives another of any rights, privileges, or immunities secured by the United States Constitution and the laws will be liable to the party injured...”And Per Salinas v. U.S. 522 at 65, 118 S.Ct. at 477, 139 L. Ed. 2d at 362:

“A conspirator must intend to further an endeavor which, if completed, would satisfy all of the elements of a substantive criminal offense, but it suffices that he adopt the goal of furthering or facilitating the criminal endeavor. He may do so in any number of ways short of agreeing to undertake all of the acts/omissions necessary for the crime’s completion.”

And Per United States v. Nixon 418 U.S.683, 686 (1974) likewise exposing and indicting President George W. Bush unlawfully aiding and abetting with his alleged Federal powers with his brother Jeb Bush et. al.(with his lawyers team of Gibbs, Conner, Canady and “others”

concealing Grant ET. AL.), Mel Martinez and Charlie Crist ET AL. and “others” in their illegal actions.

10. Additionally, Defendants including: Judge Barbas back to 9th Circuit Judge Rom Powell; The Florida Bar; The Florida Supreme Court [Especially noted that at said relevant time of their Criminal actions that 6 of 7 “alias” justices of the FSCT had not taken their proper Oaths of office]; FDLE; Attorney’s Generals; Sheriffs and Others have already had superior courts rule they are acting illegally as F.S.768.28, 768.73 terms “the single source of conduct” denies Sovereign Immunity as perpetrator’s in this cause individually and in conspiracy do continued actions of theft of Townsend’s and Plaintiffs Properties and Rights converting these Properties for their own personal advantages by continuing Malicious Prosecution with ongoing extortions to allege Under Color of Law defamation of Townsend and the facts Townsend continues to prove are true and to deny Townsend and those for who he speaks our children, “Civil Rights” and Properties:

A. Indirectly, as the:

(1) SHERMAN ACT is stated in MONELL No 75-1914, 436 U.S. 658, 56 L.ED 2d 611, 98. See Plaintiff’s RENEWED SECOND VERIFIED MOTION FOR DISQUALIFICATION OF JUDGE BARBAS filed by the Clerk of the Circuit Court 5/10/2007 in underlying case 02-03812 (Page37) and being again filed in this record of 15CA1928 Records herein

(2) The 1992 American Bar Association’s McKay Commission Report ruling against the collusion in the Florida Supreme Court and Florida Bar violating Due Process and the U.S. Supreme Courts unanimous ruling in Keller v. State Bar of California 496 U.S.1 (1990) that a State Bar shall not immune itself by selective applications of its rules and acts/omissions to promote its own : agenda; political purposes; and or criminal enterprise.

(3) United States v. Throckmorton 98 U.S.61, 25 L.Ed.93 (1878):
“Where the unsuccessful party has been prevented from exhibiting fully his case...or where the attorney regularly employed corruptly sells out his client’s interest to the other side...”

B. Directly:

(1) Florida Bar Officer John B. Root Jr. advising Townsend:

“This is the worse case of abuse I have seen by an attorney on a client in my over 27 years investigating cases but my boss(Jan K. Wichrowski and others) has told me to close this file and never talk to you again! Good Bye!”

These “impeded” issues are reported by Investigator Cathy Cline, July 22, 1993, report for the Florida Bar and on record with the courts.

(2) Florida Bar Members Tim Chanaris and John Boggs telling

Townsend in the 1990”s:

“If you ever get your law degree we will find a way to have you disbarred within 6 months and put you in jail for something.”

(3) March 15, 2007, Federal Judge James Moody Jr. admitting

that this sounds like a violation of due process case.

C. Upheld by the rulings of the 11th Circuit Court of Appeals (EnBanc) and FSCT Chief Judge Canady in 2011 incriminating these co-participants including himself and family while as a FSCt Judge 8/08 through 2017 and 2nd DCA Judge ruling in this same continuing Townsend cases being handled by the attorney Heather Gray of which Judge Canady on the FSCt voted to accept disbarment of Heather Gray for facts she violated her client Townsend and clients as connected in Townsend's Amicus Brief and confirmed by the 2DCA, Judges Gomez (twice), and Others and the Florida Supreme Court that the criminal enterprise was and as Plaintiff's prove still continuing. Canady even argued:

"A President who has committed perjury and obstruction of justice is hardly fit to oversee the enforcement of the laws of the United States." Also saying, "His calculated and stubbornly persistent misconduct while serving as President of the United States has set a pernicious example of lawlessness, an example which by its very nature subverts respect for the law."

Canady should know firsthand the facts Townsend proves as his father was for Governor Chiles a Senior Advisor and Canady a democrat also switched to be General Counsel for Jeb Bush who then appointed him to the 2DCA and then appointed to the FSCt by Charlie Crist.

If anyone knows the crimes Townsend alleges it is one on the inside as Canady who has admitted "Checkmate" and recusing himself and the FSCt in this case. Even President Nixon and Clinton was not immune.

11. Multiple Federal Appeals courts even our own governing this case

stated judges are not the court but officers of the COURTS and can be sued for Torts even per F.S.§768.28(2) for their intentional “Under Color of Law” TORT and Omission as a Tort of actions to Fraud the court which causes damages to victims as in this case the victims are those for whom Townsend speaks. Note F.S.§768.(5)”The state and its agencies and subdivisions shall be liable for tort claims in the same manner and to the same extent as a private individual under like circumstances...”. So in collusion can the FDLE Commissioner, Florida Bar Executive Director, Attorney General, Governor and Florida Supreme Court all in collusion instruct and extort “alias judges, lawyers and law enforcers” and say they are no longer responsible to a citizen and violate the Due Process Of the Constitution and take away their Civil Rights, Children, Religious Rights, Right to Work, Property and embezzle by frauds monies and rights from a Church/School membership as owner/operators per a Secretary of State approved Bylaws as F.S.768.28(9)(a) says if agent acted in “bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property”. Note this claim as proved now from Townsend ET AL v Gray ET AL Federal Complaint 8:12CV-1198-T-17EAJ “36. Townsend alleges and at previous times believed Gibbs specifically and privately was providing honest legal services advising Townsend since1991-2000 as per their FBCCP Duties up to and including Townsend stating the “Demand Meeting” Rights of Plaintiffs on 09/08/1999 and also in Townsend’s Future Marketing Business Matters as Gibbs and

“Others” knew the Rule of Law also requires the 6/27/1989, Order of Judge Muszynski in Townsend v. Lane d/b/a Sabal Marketing Case No. 88-2554-CA-03-P, at some point to be followed Ordering for Discovery of all Lane and other records to be produced for inspection by Townsend within 10 days per the argument of Popper of 3/16/1989, stating:

**“4) Rule 1.280(b)(1), Fla. R. Civ. P. states in part the following:
...(P)arties may obtain discovery regarding any matter, not privileged, that is relevant to the subject matter of the pending action, whether it relates to the claim or defense of any other party, ...It is not ground for objection that the information sought will be inadmissible at the trial if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.”**

12. If these agents claim innocence they are not truthful as when the FBCCP Membership (as a Grand Jury of Citizens) did learn of the collusion by the “alias clergy” and “OTHERS DOE” and coverup and collusion as Townsend alleged since 1994 and got partial records in 2006 and with facts verified by CPA’s Proved to the Membership the criminal acts the Church Members as a Body basically in the form as a Grand Jury forced these “alias clergy” who still receive illegally F.S.§775.03 “Benefit of Clergy” from Defendants still ignoring their legal duties in this case to stop illegal acts of Jeffers et al through McDarby as even October 1, 2014, on a public Tampa Sidewalk outside the HCSO headquarters keeping Townsend from filing complaints as per his elected duties for the membership to protect their

interests and the Corporation Church/School interests as even finally in 2006 admitted by Judge Crenshaw and Attorney Denny IV who now are estopped from reversing themselves just to continue the malicious prosecution.

Note according to *The First Free Will Bap. Ch of Blountstown, Inc. v. Franklin*, ET AL 4 So2d 390, 148 Fla. 277, Stating:

“When membership was accepted therein, they submitted themselves to the ecclesiastical jurisdiction of the church...The law appears to be settled that in the absence of showing of fraud, collusion or arbitrariness on the part of the church authorities having jurisdiction of the controversy, the court will not interfere.”

The courts and other alias law enforcers have interfered since 1994, when in collusion and torts placed illegally as Deputies Jeffers and Howlett violated their membership duties only with civilian rights and with the collusion of FBCCP Registered Agent, Senator John Grant and his co-participants began intentionally doing torts and Breach of Contracts and Tort Interference with Contracts just to continuing to defame Townsend and continue the Malicious Prosecution since McCarthy, Popper and Williams with Lane ET AL, began malfeasance in 1987. This is the basis of the continuing cases as served in prior times and even served in June 19, 2012, to A.G. Pam Bondi, Chief Judge Canady and the Tampa Federal Middle District Court in case 8:12-CV-1198-T-17EAS. Please take judicial

notice as this case will be included in the record. See www.Judgeoneyourself.com.

13. Even F.S.768.28, does not allow immunity from or for the Patterns of related Punitive Torts, Breach of Contracts and Torts to Contracts as proved in this Complaint and additional illegal acts in their sham doing “odious and outrageous” omissions of duties that Townsend continues to prove upon completed discovery and by defendants own admissions about themselves and their co-participants. In Contract Law a Breach of Contract estops the party in breach from any defenses. In this case, Townsend is not the offender but the victim of multiple years since 1987 of conspired breach of contracts for the criminal purposes of these codefendants and “others doe”. See F.S.817.02, (Obtaining property by false personation) Law by these Under Color of Law self dealing “alias Government Persons”, and Other Defendants, and “others Doe” per F.S.777, PRINCIPAL; ACCESSORY; ATTEMPT; SOLICITATION; CONSPIRACY who conspire even after the 2011 Admission by Florida Supreme Court Chief Judge Canady Indicting himself and his personal knowledge of the Chiles sham for which he and his father as aid to Chiles, and Charles as legal counsel for Jeb Bush benefited and these Named “Bondi-ites” Criminal Participants and yet to be revealed “others Doe” due to illegally “impeded” discovery by their ongoing conspired, fraudulent Acts/omissions and Patterns of “Proved Shams” of Past Actions and “Fraudulent and Defamation Predictions” as Townsend alleged and said to all since about 1987:

14. Assistant Attorney General Shelley Cridlin as another now acting naïve and tortful agent AND IN VIOLATION OF HER FLORIDA BAR OATH furthering a crime, just as her Co-Participants and Superior, "...I will not counsel or maintain any suit or proceedings which shall appear to me to be unjust...", is affirming and now admitted as "True", for herself and her superior officer Attorney General Pamela Jo Bondi and as Pamela Jo Bondi, Individually, and Agency and others including this FDLE and the now former FDLE Commissioner Gerald Bailey WITH THE FDLE (FOR 33 YEARS) and others as defendants herein JOHN HARKNESS (for over 30 years) as Townsend has alleged their criminal purpose and their resulting criminal actions "Under Color Of Law" in violation of 18USC§1951 and §1961 are still ongoing and never "accruing" since 1987, and claiming their have "self-serving immunity" and confirming via now another Government Person and Agency "In the Government Veil" that Townsend is a whistle blower and has been Truthful and Lawful since 11/1987 and not the "criminal", "liar", or "crazy" or "dangerous with guns" or "abuser" or "unlawful", as defendants have defamed intentionally and knowingly, Townsend since 1987 and proved these defendants and co-participants and others Plaintiff Townsend continues to include using the Pellgerini v. Winter Rule but denied by co-participant judges in violation of Florida Constitution Article II. Section 8. Ethics in Government and Article I. Section 3. (to be fully incorporated herein) doing ongoing collusion to do Frauds on the Courts, Criminal Acts and violations of Florida Bar and Black

Law Rules and Due Process and by each argument herein even admit their intentional violations of Florida Constitution Article I Section 3, by their illegal implementation of Sheriff Deputies Jeffers and Howlett as “Religious” leaders of a “Sect” for intentional “illegal purposes” to remove the Civil Rights and contract (Bylaws) of the members continuing through HCSO McDarby multiple times outside his Authority and Jurisdiction coming to Townsend in a non Hillsborough County specifically to make threats while litigation is continuing to: (1) Stop trying to see your kids; (2) Stop trying to go to your church; (3) Stop filing lawsuits;

A. their professional and personal confirmation(s) of damages due to criminal acts, estopping even those personally directed to be performed by FDLE Bailey, Individually and for others, even at the service of Governors (Chiles, MacKay, Bush, Crist and Scott --[Plaintiff will show Gov. Scott finally fired Bailey for causes related to this Lane ET AL case (violations of common law duty since the 1990’s) and Bondi, Putnam and Atwater are duly advised.]--), in collusion with and by Pamela Jo Bondi, individually, and using her Professional and Political Positions in conspiracy even in 2015 now by her agent(s) Ober and Others: (1) per process server, Tyree Slade in an affidavit filed with this court and now part of the record stating “Server attempted different departments at the Capitol (400 S Monroe Street, Tallahassee FI 32399). Cannot accept service on behalf of Pam Bondi.” Each agent contacted failed to accept Summons tried to be served on June 24, 2015. Additionally, DPI Florida Process LLC. Owner, John

Bashaw, stated he had his license threatened to be taken from him if he served Pam Bondi, Individually, Jeb Bush and Charlie Crist and others now listed as Defendants again in this action as prior illegal actions by judges and now process servers neglect their contract duties under the law and are continuing the pattern from Rom Powell, Judge Crenshaw and Denny IV and “Others” not allowing these persons to be added on August 10, 2006 or before or after as Government Persons now in cases since Chapin ET AL continue to not allow Townsend to break the “Government Veil” that courts and government persons since Judge Muszynski, state do exist; (2) to do the filing of for delay and “frauds on the courts” their Motions For Dismissal with her co-participants [directly Patricia McCarthy causing monies lost since 8/1987, since 1988 David Popper, since 1989 Bruce and Linda Chapin and Governors and various Judges, since 1991 David Gibbs, since 1994 John Grant, and these since unknown times Mel Martinez, Mark Ober, Robert O’Neill, Pat Bean {as Hillsborough County Attorney and Hillsborough County Administrator until she was fired}, FDLE Commissioner Gerald Bailey (33 years with FDLE), others and Cindy Sanz (since 2/2004) later promoted to Director of FDLE’s Office of Executive Investigations and Assistant Commissioner, HCSO, Pasco, Pinellas Sheriffs Depts. {Sheriffs and Deputies since 1994-Jeffers, Howlett, since 1997-Smoak, Terry since 1997, through to McDarby}, Karen Harrod Townsend, Ron Beck, Tim and Karen Jeffers, Charles Scruggs, Charles Denny IV, Heather Gray and Others], and the Department of Financial

Services since under the directions of Tom Gallagher the lead recipient of one of Townsend's Notice Of Claims (and many other Notices since as part of their scheme is ignore the Notices are as the Florida Bar Jane Cristy admitted "I just threw it in the trash") "impeded" by Defendants acting illegally for her (Bondi) own QUID PRO QUO and Financial Enrichment, as reported in multiple earlier related Complaints, Briefs, Motions and Orders, and now estopped from denying their proved fraudulent actions as verified by superior courts and repeated in this case per R.O.C.P. 1.540(b) "...For Fraud Upon the Court." New Independent Action Case, 15CA1928

Complaint as a "Brief" and "Plain" Cause of Action(s) since the illegal actions began in the start of this cause when in 11/1987, Townsend reported to "alias Law Enforcers", Attorney Patricia McCarthy and others who illegally failed to do discovery of criminal actions of Charles E. Lane Jr. (illegal drugs and RICO extortion(s)) and said law enforcers and others as Defendants herein and "Others Doe" to be revealed in addition to the crimes reported herein, upon further discovery had aided and abetted in a conspiracy to continue concealing crimes so that Charles E. Lane Jr. could continue his criminal actions as verified by the courts and even defendants themselves and continue to take the monies owed or monies that were to be in the care of the supervision of Townsend to go for the purpose of unjust enrichment for the Lane ET AL co-participants and as extortion(s) attorney's McCarthy, Williams, Popper, Chapin, Gibbs, Grant, Scruggs, Gray, Turmel, Denny IV, Rolfes, Gaylord, Tropp, Presnell and countless

others (including FDLE Senior Officers [Bailey, Sanz] and Politicians) in collusion for and with since the 1980's, Publix Executives Charles E. Lane Sr., Ed Crenshaw and others, to obtain unreported monies and other Quid Pro Quo benefits by extortion and through collusion: (1) pass these funds and Publix Operating Funds and Name Brand Support to the yet fully unknown alias law enforcers and politicians and Others, for the other purpose of taking business away from those not in their RICO Schemes (2) by Quid Pro Quo place their co-participants of their scheme in places to discredit and defame Townsend and these facts now the Attorney Generals' office admit are true as they have done on prior cases yet refused in collusion with other alias law enforcers of the FDLE, Sheriffs Departments, Police Departments, State Attorneys, Florida Bar and Judges to follow the laws to stop said violations of law but by conspiracy aided and abetted these additional criminal acts to occur namely to discredit and defame Townsend proving he was (1) not paid monies per the 8/1987 Joint Venture Agreement as a contract with Lane; (2) prohibited by law enforcement by frauds and "ineffective services" from continuing Townsend's Future Marketing Company at the demand of Townsend's customers; (3) told he could not work in any business for over 4 years without the lawyers/Lanes/Judge Powell's authority; (4) that Townsends Legal positions in the Townsend v. Lane 9th Circuit case C189-3299 from the 18th Circuit Case C188-2554 was "not lawful" as in order to advance their conspiracy to: (A) conceal the malpractice and malfeasance and collusion

of McCarthy and Williams and Popper; (B) defame Townsend; (C) obtain more monies and advanced the now proved Malicious Prosecution and frauds done through the Sham Counter Claim(s) filed since 7/1988, by Charles E. Lane Jr. and his since childhood drug partner and Lawyer Charles Williams Jr. so that Publix could fund Quid Pro Quo payoffs (reported and not reported) to advance the political and personal projects of Governor Lawton Chiles, Linda Chapin, Judges Powell, Stroker, Perry, the 5th DCA, Florida Supreme Court, Mel Martinez, Bush, Crist and Others (AFFIRMED BY THE 5TH DCA in ROBINSON) in while through illegal discovery means Bruce Chapin, Individually and P.A. with his firm and wife, did torts to obtain illegally money (over \$40,000) as lawyers fees and cost for work never intended to be performed from Townsend and the companies for which Townsend was their contracted agent so the Townsend and Jointly owned companies could be redirected only to Lane (or to Linda Chapin as Chairwoman of the Orlando County Commission and ET AL for political Quid Pro Quo) and Townsend and Lanes former employer Nova Sales (Joe Ligori ET AL) who actively participated in procuring and the distribution of extortion and money to Publix Executives and Others and that the companies and (2) by in intentionally known conspiracy violate Florida Constitution Article I. Section 6. Right TO Work, illegally Under Color of Law conspiring Townsend was unlawfully violating an alleged Non-Compete Clause as Defendants Doing RICO ACTS and Torts in violation of the HOBBS ACT 18USC 1951 and multiple other

Federal and State Laws, keep Townsend and his companies from doing honest services in the Retail Businesses in Florida and throughout these United States; (3) Illegally in violation of the FBCCP Bylaws and Florida Constitution Article I. Section 3. "Religious freedom.", Section 1. "Political Power.", Section 2. "Basic Rights.", Section 4. "Freedom of speech and press.", Section 5. "Right to Assemble.", Section 9. "Due Process." Section 12. "Searches and Seizures.", Section 13. "Habeas corpus.", Section 14. "Pretrial release and detention.", Section 16. "Rights of accused and of Victims.", Section 17. "Excessive Punishments.", Section 18. "Administrative Penalties.", Section 19. "Costs.", Section 20. "Treason.", Section 21. "Access to courts.", Section 22. "Trial by Jury.", Section 23. "Right to Privacy.", To illegally implant non-members and non-member "Officers", "Sect" Deputies Jeffers, Howlett and Smoak and their wives and keep Nasworthy, Beck, Meister, Brown, Karen Harrod Townsend and "Sect Others" in Official positions defaming Townsend's "impeding" and "obstructing" doing his duties per the Bylaws and State Laws as their Elected Authority per the 100% vote of the members to act on their behalf and for the Corporation Not For Profit,; (4) Do multiple illegal actions in violation of the FBCCP Bylaws and Constitutions with "Sect Members" in violation of the Bylaws and Florida Constitution to (a) conceal illegally diverted monies to conceal tax evasion and unjust enrichment as confessed by Elbert Nasworthy 10/1994; (b) the illegally obtained Eminent Domain Settlement process negotiated by Grant, Gaylord, Bean,

Nasworthy, Beck and others as frauds to the FBCCP Members and the Tax Payers; (c) doing the 1997 illegal purchase of the 18005 Gunn Highway Property by frauds to the members and citizens of Florida as Townsend and other members objected; (d) the frauds done Quarterly and Yearly in the FBCCP/CPCS Business Reports to the FBCCP Members; (5) To in violation of the FBCCP ByLaws remove Townsend from his Member Elected Officers Duties and from assembly in his church with his children and fellow members; (6) abduct the Townsend children from their father and home since 10/1999; (7) Continue Obstruction of Townsend's confirmed reports of Justice since 1987, reports to Patricia McCarthy and Alias Law Enforcers still continuing. EMPHASIS ADDED.

B. This Motion For Dismiss is more continued Malicious Prosecution in the forms of frauds "Under Color of Law" to delay and conceal ongoing criminal actions and delays since 1987 meant for repeating again many actions already deemed illegal under the color of law by these same defendants and Superior Courts.

Ms. Cridlin's professional duty per her Oath Of Office as Assistant Attorney General is as a contract with the citizens of Florida to protect said citizens from all criminal actions and this then includes revealing criminal actions of those who use their "professional" or "political" positions for personal gain and not attack citizens who are "whistle blowers" as in this case since 1987 and thus ethically per also the F.R.O.P.C.4-3.1 (Prohibits attorney from Bringing or defending a Frivolous Suit), BLACK LAW RULES

she and others should be prohibited from concealing ongoing criminal actions against citizens now attempting as an Officer of the Court to do more "Fraud(s) on the Court".

Ms. Cridlin's argument in points below are "Breach of Contracts", estopped, incomplete, fraudulent and uses omissions of facts already in this Complaint and in the record and in the knowledge of Judge Barbas based on his prior actions in the underlying cases and facts and by his Exparte meetings and verified by other courts and even criminal prosecutions done by the Attorney's General Office ET.AL. as criminal acts by others other than themselves who she is attempting to conceal as follows:

"3. "Plaintiffs Complaint is rambling and incomprehensible...underlying dispute involving Plaintiff and members of the FBCCP dating back to the 1990'S. "

A. The Superior Courts, Florida State Courts, Defendants and Others have already aligned with Townsend that since 1987, his attorneys and other were and are involved in criminal acts as "Extrinsic Fraud" and "Frauds on the Court(s) as stated herein from briefs and orders;

"Quoting even from this 11th Courts cases own rulings even herein citing Salinas v. United States 522 U.S. 52 (1997) quoting on accepting RICO VIOLATIONS per (1962 (c) bribes and (1962 (d)) conspiracy and Pinkerton v. United States, 328 U.S. 640, 646 (1946) ("And so long as the partnership in crime continues, the partners act

for each other in carrying it forward.”) If conspirators to perpetrate the crime and others to provide support, the supporters are as guilty as the perpetrators. As Justice Holmes observed: “[Plainly a person may conspire for the commission of a crime by a third person.”

United States v. Holte, 236 140, 144 (1915).

Defendants own records show their U.S.C. §1961, §1962, 18 USC 1346 (Honest Services) and other U.S. Codes illegal actions and willful admissions to conspire.

Attorneys and “Others” in collusion did fraud Townsend to get the Townsend v. Lane and the SHAM Counter Claim by Lane V.

Townsend case moved from Seminole County to Orange County so Bruce Chapin and Linda Chapin and “Others” in case 89-3299 could conceal the illegal acts of all against Townsend ET AL. (WITH PROVED SINGULARITY) and as the conspiracy to continue criminal acts is still ongoing now having involved these Appellees and “Others”.

Thus discovery in 5/2011, of this Robinson v. Weiland, ET AL 5D05-2380, 5th DCA Ruling Affirming Townsend and with Judge Orfinger ruling 9/1/2006, and his reversal cases in 2011 which affirmed the arguments of collusion and fraud on the court by Lane ET AL with the attorneys and judges and others, to the 5th DCA made in Townsend v. Lane ET AL Case CI-94-632 submitted 2/4/1995.

Thus then is the admission of “Check Mate” as agreed by FSCt. Chief Judge Charles Canady in 2012 in this continuing matter and having to acknowledge Townsend’s attorney Heather Gray hired (2003) and paid to file appeals for these matters as Townsend has had to do Pro Se was disbarred by the FSCt in 2009.

B. Now Defendants Judge Crenshaw and Attorney Denny IV wrote most of this Complaint on 5/10/2006 and True back to the 1990’s as FDLE has been aware since the 1990’s and updated multiple times over the years as the records show Gerald Bailey and Cindy Sanz Tampa office in 2004 (AND OTHER TIMES) and multiple FDLE Senior officers in the Orlando Office (Complaint page 25. Point 82.A.1. and others were directly involved in the criminal actions and “impeding” as Obstruction of Constitutions, Laws and the FBCCP Bylaws Townsend has reported by those doing Tort Crimes and officers not doing their Duties per their OATHS of Office constitutes unlawful actions and aiding and abetting ongoing crimes since the concealment of the Lane and Publix violaitons of laws Townsend revealed since 11/1987.

4.a. “...fails to state a claim”. False as officers/Judges knew of ongoing crimes and assisted in violation of the law, Constitutions and ByLaws.

4.b. Suit not barred by Sovereign immunity. Pre-suit Notices does not apply as torts have and are being proved and Plaintiff has previously supplied to defendants herein and others doe multiple times of their crimes and liabilities and by collusion directed by defendants said Notices of

Claims have been in collusion “impeded”. Plaintiff can supply this court records already in the care of the courts files of these related cases and with records of how compliance notifications were sent to these defendants and others. Additionally, multiple lawyers hired by Townsend or those allegedly working for the FBCCP Corporation as Grant, Gibbs, and Denny IV, and Scruggs and Gray who Townsend proved was the F.S. 617 Representative and others were to have insured these if applicable notifications had to have been filed since each knew these acts were being done per the CRIMINAL plots since 1987 and involved illegally implanted deputies since 1994 at FBCCP and others doing EXTRINSIC FRAUDS AND “frauds in the courts” with the intent purposes of CONTINUING THE GOVERNMENT VEIL BY intentional torts in violation of : professional malpractice, torts, contract torts, intentional negligence providing inferior legal services to do harm committing acts in bad faith exhibiting wanton and willful disregard of human rights, safety or property to cause abduction of J.D.T. and J.G.T. and Townsend’s and FBCCP/CPCS’s future economic benefits.

4.c. Crimes are still ongoing by Karen Harrod Townsend, Tim Jeffers, Karen Jeffers, John Grant, Joe Howlett, Mike Smoak, HCSO, Pinellas Sheriffs office, and David Gee and Mark Ober, even illegally using HCSO Deputy John McDarby multiple times traveling still in 2014, outside his jurisdiction to Townsend’s places and making threats to (1) Don’t Go to your Church; (2) Stop filing Lawsuits; (even while lawsuits are pending judicial orders);

(3) Stop trying to see your kids but send me a letter to each of them and said he would personally deliver said letters and then October 1, 2014, admitting while standing on City Of Tampa Property at the HCSO 2008 8th Street Headquarters admitting he never talked to J.D.T. and J.G.T. or never delivered the letters he claimed to do on his 4/8/2014, illegal threatening visit in followup to the Letter sent to HCSO Sheriff Gee and others of April 1, 2014, informing them of frauds John Grant had posted on Facebook as stated in the complaint as they were and still are personally assisting Gerald Bailey and other co-participants including Bondi up and till his termination by Governor Rick Scott on December 16, 2014 in a meeting with Scott attorney Pete Antonacci. Defendants still falsely use F.S.741.29, Investigations by law enforcement officers of incidents of domestic violence; notice to victims of legal rights and remedies; reporting of incidents” fraudulently that Townsend was arrested for Domestic Violence as falsely written and alleged by John Grant on March 2, 2014, when it is well proved even by the 12/2005 Affidavit filed by Karen Harrod Townsend to the court of Judge Holder in an underlying case 05CA9605 as a suit under F.S. 741.235 and battery with Malicious Prosecution as her role in the frauds F.S. 837.02 Perjury in official proceedings recurring back to the Sham Counter Claim of 7/8/1988 filed by Charlie Williams Jr. now confirmed as multiple violations of F.S. 837.021 “Perjury by contradictory statements”, and perjury per F.S.837.05 “False Reports to law enforcement

authorities” back to 11/1987, using violations of F.S.837.06 “False official statements” including:

(1) False reports by all since 11/1987 trying to make Townsend the “liar” for allegedly making false claims; (2) False reports Quarterly and Annually to the FBCCP Members in Business Meetings since 10/1994 as reports were in parts authored by the Jeffers receiving benefits from the frauds; (3) False Affidavits in the Divorce case 02-4794 concealing her monies and Quid Pro Quo benefits from illegally joining her fellow co-conspirators in their frauds to keep her out of jail for her crimes of battery on her Husband this Plaintiff and the children J.D.T and J.G.T., even to the point in her fits of rage once trying to load a shotgun to be used on the family and admitting her conspiracy with Others that the charges against Randall Townsend from the underlying cases 01-15813 and 01-15814 and counterclaims by Lane ET AL were all conspired frauds and the tort interference with child custody continues since that day of 9/8/1999, “to impede Townsend’s 617.0834 Duties and even advising Townsend if he returned to the Church he would be arrested as Jeffers illegally with HCSO trespassed Townsend) by McDarby and others as begun by illegal collusion by Karen Harrod Townsend, with Ron Beck ET AL, Tim and Karen Jeffers [Authors of fraudulent FBCCP/CPCS reports and Note in their July 7, 2015 incompetent at law and fact(s) joint answer, they still state “Said accusations are incoherent ramblings of an apparent mentally unstable individual.” Townsend with this Jeffers Answer now as fact, still proves since 1994, the

Jeffers were never going to get the Approval of Townsend from the FBCCP Bylaws Committee as Nomination for their unlawfully obtained positions as Trustee and School Principal as this is proof of collusion still ongoing by the likeness of defamation statements since 1994 by Jeffers-Grant(3/2/2014 Facebook rant.) and others who are incompetent of laws and facts now even affirmed by their Co-Participants and Superior Courts.] and others stated as Co-Participants and “Others Doe” willfully and intentionally still making threats to Townsend and to his children impeding Civil Rights; (4) False Statements in making these Motions For Dismissal in writing “with the intent to mislead a public servant in the performance of his official duty” in this case dismiss another justified action even a under false pretenses written by Judge Marva Crenshaw and Charles Denny IV to conceal their frauds and illegal actions of themselves and their now proved co-participants.

4d. Defendants are estopped from making this argument as Law requires Discovery before case should be stopped from being Amended or Dismissed. Cite Randall (Randy) Townsend v. Lane as 5th DCA Ruled in ROBINSON shows this same Townsend as the Plaintiff herein shows his arguments since the ruling of Judge Muszynski in 1989, that these Defendants in collusion have violated the law and admitted by the 11th Circuit Court of Appeals and Chief Judge Canady of the Florida Supreme Court and even Judge Crenshaw and Denny IV by writing the majority of said Complaint 5/10/2006 as a crime to even limit exposure of additional

crimes and of co-participants even those Exparte advising her and Denny, in violation of F.S. 837.06. Additionally, Defendants have admitted these sufficiently pled “inside the four corners” allegations but also at the same time cannot call her Superior Judges and Law Enforcers who have admitted these unlawful acts now “Liars” that Causes of Actions for Damages is not allowed or that somehow Defendants had no warnings from Superior’s that their crimes and Abuses Of Process for Malicious Prosecution just to protect themselves from liabilities that started in 1987 when defendants began their unlawful scheme to conceal they in August 1987 to July 1988 had cost Townsend millions of dollars of sales thus commissions.

“II. Legal Argument in Support of Dismissal

A. Page 3-Failure to State A Claim of Relief. Townsend states:

1. All complaints per Rule 1.110(b) “shall be considered to pray for general relief.” And because of the ongoing “illegal enterprise” to conceal the Government Veil of receiving unreported funds and Quid Pro Quo rewards between Lane ET AL, Publix Executives and Publix to and between Chapin’s and Politicians, their agents and co-participants as FDLE, THE FLORIDA BAR, Governors, Judges and Law Enforcers have received unjust enrichment by this violations of ethics since 1987 and not allowing Townsend to expose Lane ET AL aided and abetted the Fraud on the Court as “alias” judges unlawful as officers of the Court have “impeded” Contract Obligations (reporting monies and right to assemble with co-

worshippers and kids and customers) and violated Official Due Process of a Lawful Constitutional Court;

2. The integrity of the Court(s) and those Justices who have in these connected facts require this case to go forward as Dismissal at this time as in times past of other “alias” lawful judges shows Judge Crenshaw and Denny IV who authored most of this Complaint as providing “ineffective services” in collusion to limit exposure of the violations of law and as the “corporate and government veil” as Townsend has alleged since the early 1990’s after leaving the law office of now a Federal Judge and in most cases of this Complaint very few words and in some cases only the word(s) “Others” or “Others DOE” were added to the work product of Marva Crenshaw acting as “alias” Under Color of Law as an honest Judge.

3. The Attorneys General Officer(s) alleging Plaintiff’s Complaint fails to comply with a “...cognizable, legal cause of action...” is a false statement that naïve Cridlin makes before it appears doing research or interview with her participants for which she speaks, as this AG’s Office, FDLE (so Cridlin has found and interview Bailey, when my service processor could not yet locate him and Sanz and compared their defenses of lack of prosecution etc as it differs from Ober who has failed to yet answer his personal summons as an individual), Judges, Sheriffs, Federal Officials and with others had upon prior collusion instructed Judges since “alias” honorable judge Rom Powell in collusion with CHAPIN ET AL to delay and do dismissals and in the case 02-03812, Judge Barbas even

backdate a Dismissal Order (An act the Florida Bar has in the past did disciplines.) to bar filing Townsend filing an appeal as even the 9/11/2006 letter of Charles Denny IV admitted and nor did the court clerk acknowledge that the Order had been signed on the date as stated by judge Barbas and as judge Crenshaw to attempt the 5/10/2006, Malicious Prosecution Complaint writing sham to conceal fraudulent co-participants and their prior and now still ongoing illegal acts as now Defendant Denny has placed in the records as evidence of the 5/10/2006 Complaint as evidence of their F.S.837.06 writings to conceal criminal acts.

4. “No Law shall impede the Obligation of a Contract” is in the U.S. and Florida Constitution(s) and contracts connect all duties and actions expected to be formed by Defendants. Or the Breaches to said Contracts that have been and continued to be violated by defendants put Government Veil Participants in violations of their Oaths as their First Duties or they provide “ineffective services”! So any claim that required Townsend to act per F.S.768.28 before being illegally is unconstitutional and being violated by Defendants means damages to contracts incurred on victim Townsend prior to Townsend knowing his lawyers were in collusion with Government Persons to violate his Contract Rights and do torts as Government Persons scheme differently and unpredictably now for over 25 years. Thus F.S. 768.28 (9) (a) “...unless such officer , employee, or agent acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. However, such officer,

employee, or agent shall be considered and adverse witness in a tort action for injury or damage suffered as a result of any act, event, or omission of action in the scope of his employment or functions....” And until discovery of emails and bank records or depositions or interrogatories are complete Townsend cannot as Ruled in ROBINSON for Townsend as said since the 1990’s begin to fully know or to perfectly argue in a complaint or prove to a jury who acted in bad faith, with malice or malicious purpose to do the damages that these defendants admit are being done but they refuse to stop said damages since 1987 illegally taking Townsend’s kids and property and rights and the FBCCP/CPCS F.S. 617 Corporation NOT FOR PROFIT, rights and property being unlawfully and incompetently run by imposter Sheriff Deputies and imposter and incompetent as Trustees and others as never properly Nominated by Townsend in his Officially Elected Positions to the membership per the Bylaws to be properly elected so by Laws their actions and those that have aided this interference with Contract Rights continue Torts and unjust enrichment as Popper started in Townsends first Complaint in Seminole County back in 1988 still accruing damages for which Townsend ET AL has not been compensated and therefore the Statue of Limitations has not run because the original violations of these contracts continues by their criminal enterprise to “slander” and “damage the character and reputation and unlawfully abducting the children and properties of this plaintiff” as by Grants Facebook posts of March 2, 2014, the April 8, 2014 visit for frauds and

extortion by HCSO Deputy McDarby illegally acting outside his jurisdiction in response from the April 1, 2014 letter informing HCSO Sheriff Gee of more criminal actions and frauds by Grant and even in these responses to these Summons from this complaint, it is clear to see the collusion in violations of laws and even in the unlawful, incompetent response from Tim and Karen Jeffers the continuing slander and falsehoods and incompetence by these as Officers of the Church and Principal School who cannot use proper English and spell. Thus showing why Townsend in 1994, till forever say they are incompetent and unqualified for the FBCCP/CPCS Officer positions they obtained and maintain by the Collusion with their illegal Government Officers illegally interfering with this Sovereign Religious Society and as a Corporation our Sovereign right to choose who works for the Corporation "Not For Profit" in this Right to Work State. The members removed the alias frauding pastors, Karen Harrod Townsend, Leatherman and others but because of unlawful "impeding" by these defendants Jeffers and Howletts and others have not been able to be removed because Townsend is unlawfully detained from his 1994 Elected Duties and even unlawfully trespassed by collusion with Jeffers, HCSO and other unlawful alias law enforcers through McDarby and now these unlawful attorneys filing Motions to Dismiss.

B. Page 4-Plaintiff's Lawsuit against FDLE is Barred by Sovereign Immunity

Plaintiffs state the Rule of Law here is as Defendants have admitted

and as A.S.A. Cridlin acknowledges:

1. **“Sovereign immunity against the State or its agencies is waived only for tort actions and for injuries that are a result of an act, event or omission committed by and officer, employee, or agent of the State. See Fla.Stat. §768.28(1) and (9).” Page 4, A.S.A Cridlin agrees the “common-law duty” violation waives Sovereign Immunity and also that the complaint in points as Point 82-A. page 25-26, ignored their common-law duty to stop illegal actions when multi-county areas or “alias” law enforcers and others are in collusion for a criminal enterprise to violate a State or Federal Law as the duty defined by the Legislature and Courts. Senior FDLE as Commissioners including Gerald Bailey who promoted Sanz to conceal what facts Townsend reported to her since 2004 as Townsend had reported to others since about 1994. New FDLE Commissioner Richard L. Swearingen has been advised on his FDLE departments lack of common-law duties back to 1994, concealed by Bailey ET AL in this case and again the FDLE is intentionally negligent for the common-law duties they are to perform to date. Others are prosecuted for delays even of a much shorter period and for much less violations that have been proved herein as A.S.A. Chidlin and others try to continue to evade their common-law duties enforcement of stopping crimes of others and their own.**

C. Page 5, Plaintiff Failed to Provide Timely Pre-suit Notice per F.S

768.28(6)(a). Notifications have been and are still being ignored. As confirmed on page 62 below the records show Townsend personally had conversations and mailed documents to and with Sanz, Mr. Moody, Mr. O'Connel and Jay Wilson at the Department of Financial Services in or about since June 2006 after receiving the partial production finally ordered by judge Crenshaw and as containing proof: Townsend was still a member; Should not have had to pay the \$924 ordered by Crenshaw because the Bylaws were Breached by Defendants in not producing said records freely to all members as Townsend had demanded since 10/1994; Collusion and Frauds were proved.

The Complaint clearly in CAPITALIZED PRINT states in page 5 ¶6:

“THESE MEMBERS AT LARGE OF THE F.S. 617 CORPORATION “Not for Profit” AND OTHERS WHO THEN KNOWINGLY, WILLFULLY AND INTENTIONALLY VIOLATED KEEPING TO THEIR FIDUCIARY DUTIES TO ALLOW PLAINTIFF TO REVEAL HIS KNOWLEDGE OF THE “SECRET FUNDS” AND OTHER FLORIDA STATUE VIOLATIONS BY THE DEFENDANTS-THESE MEMBERS AT LARGE AND OTHERS BECAME CO-CONSPIRATORS AND DID EXTORT TO DAMAGE THE CHARACTER AND REPUTATION AND UNLAWFULLY ABDUCTING THE CHILDREN AND PROPERTY OF THIS

**PLAINTIFF BY ALLOWING...” the ongoing collusion,
defamations and frauds as reported in the example herein.**

“July 2006 “NOTICE OF CLAIM(S)

INDIVIDUALLY AND JOINTLY PER INDIVIDUAL, AGENT AND

AS AGENCY OR STATE OF FLORIDA DEPARTMENT HEADS:

Mr. Tom Gallagher

Department of Financial Service

200 E. Gaines Street

Tallahassee, FL 32399-0324

Mr. Gerald Bailey

Commissioner, FDLE

2331 Phillips Road

Tallahassee, FL 32302

Lance Newman

FDLE Regional Director, Tampa

4211 N. Lois Avenue

Tampa, FL 33614

Manuel Menendez Jr.

Chief Judge

800 East Twiggs St

Tampa, FL 33602

Sheriff David Gee, c/o

Deputy Harry Hoover

Mr. Charlie Crist

Attorney General

400 South Monroe Street

Tallahassee, FL

Mr. Mike O’Connel

FDLE Investigator—Special Agent

2331 Phillips Road

Tallahassee, FL 32302

Cindy Sanz

FDLE Special Agent Supervisor

4211 N. Lois Avenue

Tampa, FL 33614

Mark Ober

State Attorney

800 East Twiggs St

Tampa, FL 33602

Hillsborough County

Office of Administrator

2008 8th Ave.

Tampa, FL 33605

Sheriff Jim Coats

Pinellas County

P.O. Drawer 2500

Largo, FL 33779

Department of Children

And Families

9393 N. Florida Ave

Tampa, FL 33612

EXECUTIVE DIRECTOR

THE FLORIDA BAR

650 Apalachee Parkway

Tallahassee, FL 32399-2300

BROOKE S. KENNERLY

EXECUTIVE DIRECTOR

THE JUDICIAL

QUALIFICATIONS

COMMISSIONS

1110 Thomasville Road

Tallahassee, FL 32303

601 Kennedy Blvd. E.

Tampa, FL 33602

Sheriff Bob White

Pasco County

8700 Citizens Drive

New Port Richey, FL 34654

CHIEF OF TAMPA POLICE

411 N. Franklin Street

Tampa, FL 33601

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

RANDALL TOWNSEND,

PLAINTIFF,

v.

CASE NO. 05-0911

DIVISION G

CHARLES H. SCRUGGS III., Individually,

CHARLES H. SCRUGGS, III. ESQUIRE, As attorney at law

CHARLES H. SCRUGGS, III, P.A., A Professional Association Law Firm

HEATHER M. GRAY, Individually,

CASE NO: 06-6005

HEATHER M. GRAY, ATTORNEY AT LAW, HEATHER M. GRAY,

PROFESSIONAL ASSOCIATION AS A FLORIDA CORPORATION,

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

02-4974, Family Court

KAREN HARROD TOWNSEND AS

EMPLOYEE OF CITRUS PARK CHRISTIAN SCHOOL A MINISTRY OF THE

FBCCP and

STEVEN TYLER HARROD, Individually,

DONALD HARROD, Individually,

NORMA HARROD, Individually,

RONALD L. BECK, Individually,

CASE NO:02-03812

REVERAND RONALD L. BECK, AS SENIOR PASTOR, FIRST BAPTIST

CHURCH OF CITRUS PARK, (FBCCP), RON BECK AS CITRUS PARK

CHRISTIAN SCHOOL (CPCS) MEMBER, AND

THE CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK

**WILLIAM T. BROWN, Individually, REVERAND WILLIAM T. BROWN,
(FBCCP) AS PASTOR OF ADMINISTRATION,
HERMAN MEISTER, Individually, HERMAN MEISTER, (FBCCP/CPCS) AS
PASTOR OF CITRUS PARK CHRISTIAN SCHOOLS, (CPCS) HERMAN
MEISTER AS CPCS SCHOOL BOARD MEMBER,
GARY LEATHERMAN, Individually, GARY LEATHERMAN, AS TRUSTEE,
(FBCCP)
ROBERT GILES, Individually, ROBERT GILES, AS MEMBER OF
PERSONNEL COMMITTEE, (FBCCP) ROBERT GILES AS MEMBER OF THE
CPCS SCHOOL BOARD,
PAULA POWELL, Individually, PAULA POWELL AS FBCCP FINANCIAL
SECRETARY EMPLOYEE, PAULA POWELL AS CPCS SCHOOL BOARD
MEMBER,
TIM JEFFERS, Individually, TIM JEFFERS AS PINELLAS COUNTY SHERIFF
DEPUTY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER, TIM
JEFFERS, AS FBCCP TRUSTEE
MARK NUNES, Individually, MARK NUNES, AS CHAIRMAN OF DEACONS,
1999-2000 (FBCCP)
MIKE SHUMATE, Individually, MIKE SHUMANTE, AS CHAIRMAN OF
DEACONS, 2000-2001, (FBCCP),
CARL(BUDDY) RAWLS, Individually, CARL(BUDDY) RAWLS, AS MEMBER
OF THE LONG RANGE PLANNING COMMITTEE FBCCP,**

**DUANE MILFORD, Individually, DUANE MILFORD AS LONG RANGE
PLANNING COMMITTEE MEMBER FBCCP,
KAREN JEFFERS, Individually, KAREN JEFFERS AS EMPLOYEE AS
PRINCIPLE OF CITRUS PARK CHRISTIAN SCHOOL,
GAYLE LYNN, Individually, GAYLE LYNN, AS EMPLOYEE DEAN OF
STUDENTS CITRUS PARK CHRISTIAN SCHOOL,
APRIL BECK, Individually,
JIM LEAHY, Individually, JIM LEAHY AS PERSONNEL COMMITTEE
CHAIRMAN,
JOE KAREAS, Individually, JOE KAREAS, AS CITY OF TAMPA POLICE
OFFICER, MICHEAL JOHN CORBIN, Individually, MICHEAL JOHN CORBIN
AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP,
MICHEAL JOHN CORBIN, AS PASCO COUNTY SHERIFF DEPUTY
DETECTIVE,
JOYCE MEISTER, Individually,
JACKIE HOWLETT, Individually, JACKIE HOWLETT AS CPCS SCHOOL
BOARD MEMBER, JACKIE HOWLETT AS MEMBER OF THE LONG RANGE
PLANNING COMMITTEE FBCCP,
JOE HOWLETT, Individually, JOE HOWLETT AS HILLSBOROUGH COUNTY
SHERIFF DEPUTY, JOE HOWLETT, AS TRUSTEE, (FBCCP),
LON LYNN, Individually, DR. LON LYNN, AS A PROFESSIONAL MEDICAL
DOCTOR,**

**GEOFF SMITH, Individually, GEOFF SMITH, AS CORPORATION
PRESIDENT, MIKE SMOAK, AS Individually, MIKE SMOAK AS CPCS
SCHOOL BOARD MEMBER, MIKE SMOAK AS HILLSBOROUGH COUNTY
SHERIFF DEPUTY, MIKE SHAR, Individually,
THE MEMBERSHIP AT LARGE AND EMPLOYEES OF d/b/a, FIRST BAPTIST
CHURCH OF CITRUS PARK,(FBCCP AND CITRUS PARK CHRISTIAN
SCHOOL, (CPCS) AS A FLORIDA NOT FOR PROFIT CORPORATION,
JOHN A. GRANT, JR. Individually, JOHN A. GRANT, JR. AS REGISTERED
AGENT OF First Baptist Church of Citrus Park 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,
DREW GARDNER, AS Individual, DREW GARDNER AS ATTORNEY AT LAW
FOR THE CHRISTIAN LAW ASSOCIATION
STACEY TURMEL, Individually, STACEY TURMEL ESQUIRE AS ATTORNEY
AT LAW, STACEY TURMEL, P.A.
MR. CHARLIE CRIST, Individually, MR. CHARLIE CRIST, AS IN THE
OFFICIAL POSITION AS THE ATTORNEY GENERAL FOR THE STATE OF
FLORIDA, and THE OFFICE/DEPARTMENT OF THE ATTORNEY GENERAL
FOR THE STATE OF FLORIDA
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, and
DEPUTY JOE HOWLETT AND DEPUTY MIKE SMOAK AND DEPUTY SCOTT
WELLINGER, Individually, SCOTT WELLINGER, AS A HILLSBOROUGH
COUNTY SHERIFF DEPUTY SERGEANT, LUTHER CORE, Individually,
LUTHER CORE AS HILLSBOROUGH COUNTY SHERIFF DEPUTY
DETECTIVE EXECUTIVE SUPPORT DEPARTMENT INTERNAL AFFAIRS,
PAUL J. GUARINO, Individually, PAUL J. GUARINO, AS HILLSBOROUGH
COUNTY SHERIFF DEPUTY SERGEANT PROPERTY CRIMES UNIT,
JIM COATS, AS SHERIFF OF PINELLAS COUNTY FLORIDA, and DEPUTY
JOSEPH A. GILLETTEE, SERGENT ADMINISTRATIVE INVESTIGATIONS
DIVISION PINELLAS COUNTY SHERIFF' OFFICE and DEPUTY TIM
JEFFERS and THE PINELLAS COUNTY SHERIFF'S OFFICE
BOB WHITE, AS SHERIFF OF PASCO COUNTY FLORIDA, and AS A
DEPUTY JOHN MICHEAL CORBIN OF PASCO COUNTY FLORIDA and THE
DEPARTMENT OF THE PASCO COUNTY SHERIFF,
THE CHIEF OF POLICE OF TAMPA, FLORIDA, and AS 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,
MR. GERALD BAILEY COMMISSIONER, FLORIDA DEPARTMENT OF LAW
ENFORCEMENT,
CURTIS BAUGHMAN AS Individually,
NANCY LOPEZ, Individually,
CURTIS BAUGHMAN AND NANCY LOPEZ AS EMPLOYEES OF VICTIMS
ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA,
MARK A. OBER AS STATE ATTORNEY OF FLORIDA,
CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOURGH COUNTY
FLORIDA CIRCUIT CIVIL, MANUEL MENENDEZ JR. Individually,
WAYNE TIMMERMAN, Individually, JUDGE WAYNE TIMMERMAN A
CIRCUIT COURT JUDGE OF 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,**

**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 FLORIDA BAR OFFICER OF EXECUTIVE
DIRECTOR, THE FLORIDA BAR OFFICER OF TAMPA BRANCH OFFICE
EXECUTIVE/DISCIPLINE DIRECTOR AS BRANCH STAFF COUNSEL, THE
FLORIDA BAR TAMPA INTAKE STAFF COUNSEL EMPLOYEE, MRS.
LIEMAN, MRS "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, AND SANTA ROSA COUNTY, OF
THE STATE OF FLORIDA
HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA
AS DEFENDANTS,**

_____ /

COMPLAINT

AND

DEMAND FOR JURY TRIAL

COMES NOW PLAINTIFF RANDALL TOWNSEND AND STATES TO ALL PERSONS AND AGENCIES AND OTHERS AS STATED ABOVE AND HEREIN: and makes a claim against each individual as Defendant herein under Section 1983 of TITLE 42 of the United States Code, “which provides that any person who, under apparent authority of state law, deprives another of any rights, privileges, or immunities secured by the United States Constitution and the laws will be liable to the party injured. [42 U.S.C.S. §1893], and sues each agency and State of Florida Government Public Entity and or each Corporation as Stated herein, pursuant to Florida Statues 768.28(6), and makes the following statements in support of the claim:

NATURE OF ACTION

1. This is an action by Plaintiff Randall Townsend as a citizen of this Hillsborough, County of the State of Florida of these United States of America against each individual and each agency, Department, and Company as Stated herein arising from and for Defendants unlawful neglect of duty and Breach of Duty and knowingly, intentional, reckless and negligence to and of their duty and from each defendants knowing and reckless giving “Benefit to Clergy” in violation of Florida Statues 775.03, as officers of the First Baptist Church of Citrus Park and participation and interference with the Constitutional Freedoms and Rights of Plaintiff, and tort interference assisting themselves and other Defendants with injurious falsehoods against the reputation of this Plaintiff in the public eye in his

Duty of Service to the Corporation and Defendants interference with Plaintiff's Child Custody Rights causing Child Neglect, Child Endangerment and Child Abuse and Abuse of the Rights of this Plaintiff as a Father to practice freely his religious practices and beliefs with and to his Children and others by actions in violations of Florida Statues 775.03, giving unlawful "Benefit to Clergy" as it will be proved the "Clergy" was acting in violation of Florida Statues 617, NOT FOR PROFIT as a veil of gaining personal "pecuniary gain" and veil to conduct illegal and unlawful actions rather than acting in the Duty of the position to serve the interests of the Corporation Not For Profit per the laws as stated in FLORIDA STATUES 617 and maintain and keep the standards of the Corporation BY-LAWS acting as a CONTRACT AGREEMENT with all conditions as a binding legal document of the State of Florida and violations of other laws as shown herein.

2. Defendants knowingly and recklessly participated in the supply, production, and resulting damages in the advancement of the injurious falsehoods of the "clergy" to advance injurious falsehoods and omitted truthful disclosure and omitted disclosing that these acts of "clergy" were violations of Florida Criminal and Civil and Labor and Domestic Relations and Internal Revenue Tax laws and which Plaintiff as a "whistle blower" made his claims against the "clergy" these defendants did knowingly and recklessly refuse to act per their duties per the laws of this state to assist with not giving "Benefit to Clergy" to continue the injurious falsehoods and

unlawful actions against this Plaintiff and his children and the Corporation Not For Profit and thereby become Joint Torfeasor's.

3. Defendants each as individuals and as agents, Departments and Corporations did fraud and omission of truthful disclosure and denied that they had jurisdiction per the Florida Statues a duty to pursue, investigate or prosecute the allegations of violations involving a Florida Statues 617 NOT FOR PROFIT CORPORATION or allegations of violations of Officers or Clergy of NOT FOR PROFIT CORPORATIONS. This denial of jurisdiction allowed "Benefit of Clergy" and because they are so related to the claim in the action within such original jurisdiction that they form part of the same case or controversy allowing additional violations of law.

JURISDICTION

4. This Court has personal jurisdiction over this litigation under Section 1983 of TITLE 42 of the United States Code, "which provides that any person who, under apparent authority of state law, deprives another of any rights, privileges, or immunities secured by the United States Constitution and the laws will be liable to the party injured. [42 U.S.C.S. §1893], and sues each agency and State of Florida Government Public Entity and or each Corporation as Stated herein, pursuant to Florida Statues 768.28(6).

5. Further this Court has personal jurisdiction and subject matter jurisdiction per these Florida Statues: 39 F.S.(Proceedings related to Juveniles); s. 61 F.S.(Dissolution of marriage); All Florida Statues relating to duties of Public Officers; s.117 F.S. (Notaries Public); s. 415 F.S.

**(Children’s Protection From Abuse, Neglect and Exploitation); s. 458 F.S.(
Medical Malpractice); s.617 F.S.(Not for profit Corporation); s.623 F.S.
(Private School); and as employees for FBCCP and CPCS and members
assisting to block Corporations records disclosure directly assisting the
Directors actions in violation of: s. 617.1601 (Reporting of records);
s.617.1602, (Inspection of Records); s.617.0834 F.S.(Duty and Violation of
Duties); s. 617.0841 (Duty to Follow By-Laws); s. 617.1605 (60 days end of
year reporting requirement or per By-laws) s.617.10 F.S., (members right to
be heard before removal in Not For Profit Corporation); s. 784 F.S.(Assault;
Battery; Stalking; Culpable negligence); s.787 F.S. (false imprisonment;
custody offenses); s. 772 F.S., Civil Remedies for Criminal Practices as; s.
812, F.S.(theft and related crimes); s.817, F.S., (assisting Corporate officers
in violation of Fraud and Credit Card crimes); s. 836.05, F.S., (extortion); s.
837,F.S. and 914.13(perjury); s. 914.14 (Witness accepting bribe); 914.21
and 914.22 and 914.23 and 914.25 (treatment of witnesses); s. 843 F.S.
(Obstruction of Justice); s. 817.49 F.S. (False report of commission of
crimes; penalty); s. 772.102(4), F.S. (as such actions show a pattern of
criminal activity); s. 775 and specifically 775.085 F.S. (Evidencing prejudice
while committing offense; enhanced penalties); s. 775.089 F.S.(Restitution);
s. 402,F.S.(Child Care facilities); s. 827 F.S. (abuse of Children) ; s. 836 F.S.
(Defamation and Publications to expose person to hatred, contempt, or
ridicule prohibited); s.838 F.S.(Bribery; misuse of public office); s. 839,
F.S., (Offenses by Public Officers and Employees); s.843 F.S.(Obstructing**

Justice) s. 871.01 & 871.02, F.S. (Disturbing Religious and other assemblies); s.877 F.S. (Hate Crimes); s. 895, F.S. (R.I.C.O.); 623 741 s. 768 F.S. (Florida Tort Claims Act); s.918 F.S. (Conduct of Criminal trial [Repeat Violence charges per s. 784 and 18.U.S.C. on November 15, 2001]); s. 943 F.S.(Department of Law Enforcement) other Florida Statues.

6. The United States of America and State of Florida Constitutions provide “no law shall impede the obligation of a contract” and this Court has jurisdiction to enforce the rights, laws and obligations of a Contract per the rights of the Constitutions as stated herein. Per the Law the Church BY-LAWS are a contract.

7. At the time of these matters Plaintiff Randall Townsend was a resident of Hillsborough County and Defendants operated and acted in their positions with business and jurisdiction of the laws governing in Hillsborough County and of this State of Florida.

8. Further, this Court has jurisdiction as the matter in controversy exceeds, exclusive of interest and costs, the sum of over \$15, 000.00 specified for the jurisdiction of this Court.

THE PARTIES

9. Plaintiff Randall Townsend (Plaintiff Townsend), is the father of son J.D.T and daughter J.G.T as the persons deprived of their respective rights of the Constitution of the United States of America and the Statues and Constitution of the State of Florida and Plaintiff Townsend’s post office address is P.O. BOX 21, ODESSA, FL 33556.

10. Defendant RONALD L. BECK, Individually, and REVERAND RONALD L. BECK, AS SENIOR PASTOR as the Corporation officer, of the FIRST BAPTIST CHURCH OF CITRUS PARK, (FBCCP), and CITRUS PARK CHRISTIAN SCHOOL (CPCS), AND THE CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK are Defendants in lawsuit CASE NO 02-03812, Hillsborough County, Florida

11. Defendants WILLIAM T. BROWN, Individually, REVERAND WILLIAM T. BROWN, (FBCCP) AS PASTOR OF ADMINISTRATION, HERMAN MEISTER, Individually, HERMAN MEISTER, (FBCCP/CPCS) AS PASTOR OF CITRUS PARK CHRISTIAN SCHOOLS, (CPCS) HERMAN MEISTER AS CPCS SCHOOL BOARD MEMBER, GARY LEATHERMAN, Individually, GARY LEATHERMAN, AS TRUSTEE, (FBCCP) ROBERT GILES, Individually, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, (FBCCP) ROBERT GILES AS MEMBER OF THE CPCS SCHOOL BOARD, PAULA POWELL, Individually, PAULA POWELL AS FBCCP FINANCIAL SECRETARY EMPLOYEE, PAULA POWELL AS CPCS SCHOOL BOARD MEMBER, TIM JEFFERS, Individually, TIM JEFFERS AS PINELLAS COUNTY SHERIFF DEPUTY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER, MARK NUNES, Individually, MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000 (FBCCP) MIKE SHUMATE, Individually, MIKE SHUMANTE, AS CHAIRMAN OF DEACONS, 2000-2001, (FBCCP), CARL(BUDDY) RAWLS, Individually, CARL(BUDDY) RAWLS, AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP,

DUANE MILFORD, Individually, DUANE MILFORD AS LONG RANGE PLANNING COMMITTEE MEMBER FBCCP,

KAREN JEFFERS, Individually, KAREN JEFFERS AS EMPLOYEE AS PRINCIPLE OF CITRUS PARK CHRISTIAN SCHOOL, GAYLE LYNN, Individually, GAYLE LYNN, AS EMPLOYEE DEAN OF STUDENTS CITRUS PARK CHRISTIAN SCHOOL, APRIL BECK, Individually, JIM LEAHY, Individually, JIM LEAHY AS PERSONNEL COMMITTEE CHAIRMAN, JOE KAREAS, Individually, JOE KAREAS, AS CITY OF TAMPA POLICE OFFICER, MICHEAL JOHN CORBIN, Individually, MICHEAL JOHN CORBIN AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, MICHEAL JOHN CORBIN, AS PASCO COUNTY SHERIFF DEPUTY DETECTIVE, JOYCE MEISTER, Individually, JACKIE HOWLETT, Individually, JACKIE HOWLETT AS CPCS SCHOOL BOARD MEMBER, JACKIE HOWLETT AS MEMBER OF THE LONG RANGE PLANNING COMMITTEE FBCCP, JOE HOWLETT, Individually, JOE HOWLETT AS HILLSBOROUGH COUNTY SHERIFF DEPUTY, JOE HOWLETT, AS TRUSTEE, (FBCCP), LON LYNN, Individually, DR. LON LYNN, AS A PROFESSIONAL MEDICAL DOCTOR, GEOFF SMITH, Individually, GEOFF SMITH, AS CORPORATION PRESIDENT, MIKE SMOAK, AS Individually, MIKE SMOAK AS CPCS SCHOOL BOARD MEMBER, MIKE SMOAK AS HILLSBOROUGH COUNTY SHERIFF DEPUTY, MIKE SHAR, Individually, are of THE MEMBERSHIP AT LARGE AND EMPLOYEES OF d/b/a, FIRST BAPTIST CHURCH OF CITRUS PARK,(FBCCP AND CITRUS PARK

CHRISTIAN SCHOOL, (CPCS) AS A FLORIDA NOT FOR PROFIT CORPORATION and are as individuals, as agents or of the membership of the Corporation of the First Baptist Church of Citrus Park and Citrus Park Christian School operating as a ministry of the Corporation know and d/b/a, The First Baptist Church of Citrus Park (FBCCP) being sued as Defendants as individuals and in their capacity as agents of the Corporation and as members of the Corporation and as the CORPORATION FBCCP in Case NO: _____, in Hillsborough County, Florida.

12. Defendants JOHN A. GRANT, JR.(GRANT) Individually, JOHN A. GRANT, JR. AS REGISTERED AGENT OF First Baptist Church of Citrus Park CORPORATION, being sued in his role as an individual, Agent of the FBCCP CORPORATION and Officer of the State of Florida acting as a licensed REGISTERED AGENT who knowingly, intentionally, recklessly, and negligently gave “benefit to clergy” and willfully and recklessly neglected his DUTY as a REGISTERED AGENT knowing the CORPORATION OF THE FBCCP and CORPORATE OFFICERS and MEMBERS were in violations of the Florida Statues as stated herein.

GRANT maintains his office and residence in Hillsborough County, Florida.

13. DEFENDANTS CHARLES H. SCRUGGS III., (SCRUGGS) Individually, CHARLES H. SCRUGGS, III. ESQUIRE, As attorney at law, CHARLES H. SCRUGGS, III, P.A., A Professional Association Law Firm was employed and retained as Legal Counsel for this Plaintiff and maintains his residence and office and practices law in Hillsborough County, Florida. SCRUGGS

knowingly and intentionally, recklessly and negligently, gave “benefit to clergy” over the protection of rights of his own clients and to “protect his personal convictions to not make a church look bad” and did willfully multiple actions of tort and frauds on the courts and willfully violated his own Client this Plaintiff and is being sued in Hillsborough County Circuit Court in CASE NO: 05-0911.

14. DEFENDANTS HEATHER M. GRAY, (GRAY) Individually, HEATHER M. GRAY, ATTORNEY AT LAW, HEATHER M. GRAY, PROFESSIONAL ASSOCIATION AS A FLORIDA CORPORATION, knowingly and intentionally, recklessly and negligently, gave “benefit to clergy” over the protection of rights of her own clients and to protect the malfeasance and tort actions of SCRUGGS to protect his “personal convictions to not make a church look bad” and did willfully multiple actions of tort and frauds on the courts and willfully violated her own Client this Plaintiff and is being sued in Hillsborough County Circuit Court in CASE NO:06-6005.

15. DEFENDANTS KAREN HARROD TOWNSEND, (KAREN HARROD) Individually, and KAREN HARROD TOWNSEND AS EMPLOYEE OF CITRUS PARK CHRISTIAN SCHOOL A MINISTRY OF THE FBCCP and STEVEN TYLER HARROD, (STEVE HARROD) Individually, DONALD HARROD,(DON HARROD) Individually, NORMA HARROD, (NORMA HARROD) Individually.

16. UTICA INSURANCE COMPANY OF NEW YORK, AS THE INSURANCE CARRIER OF AND FOR THE DEFENDANT FBCCP.

17. 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,
18. DREW GARDNER, AS Individual, DREW GARDNER AS ATTORNEY AT LAW FOR THE CHRISTIAN LAW ASSOCIATION
19. STACEY TURMEL, Individually, STACEY TURMEL ESQUIRE AS ATTORNEY AT LAW, STACEY TURMEL, P.A.
20. MR. CHARLIE CRIST, Individually, MR. CHARLIE CRIST, AS IN THE OFFICIAL POSITION AS THE ATTORNEY GENERAL FOR THE STATE OF FLORIDA, and THE OFFICE/DEPARTMENT OF THE ATTORNEY GENERAL FOR THE STATE OF FLORIDA
21. 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,
22. THE DEPARTMENT OF CHILDREN AND FAMILIES OF THE STATE OF FLORIDA,
23. DAVID GEE, AS SHERIFF OF HILLSBOROUGH COUNTY FLORIDA, and DEPUTY JOE HOWLETT AND DEPUTY MIKE SMOAK AND DEPUTY SCOTT WELLINGER, Individually, SCOTT WELLINGER, AS A HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT, LUTHER CORE, Individually, LUTHER CORE AS HILLSBOROUGH COUNTY SHERIFF DEPUTY DETECTIVE EXECUTIVE SUPPORT DEPARTMENT

**INTERNAL AFFAIRS, PAUL J. GUARINO, Individually, PAUL J. GUARINO,
AS HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT PROPERTY
CRIMES UNIT, AS DEPUTIES OF HILLSBOROUGH COUNTY SHERIFF'S
DEPARTMENT AND THE HILLSBOROUGH COUNTY SHERIFF'S
DEPARTMENT OF THE STATE OF FLORIDA**

**24. JIM COATS, AS SHERIFF OF PINELLAS COUNTY FLORIDA, and
DEPUTY JOSEPH A. GILLETTEE, SERGENT ADMINISTRATIVE
INVESTIGATIONS DIVISION PINELLAS COUNTY SHERIFF' OFFICE and
DEPUTY TIM JEFFERS and THE PINELLAS COUNTY SHERIFF'S
DEPARTMENT OF THE STATE OF FLORIDA**

**25. BOB WHITE, AS SHERIFF OF PASCO COUNTY FLORIDA, and AS A
DEPUTY JOHN MICHEAL CORBIN OF PASCO COUNTY FLORIDA and
THE PASCO COUNTY SHERIFF'S DEPARTMENT OF THE STATE OF
FLORIDA**

**26. THE CHIEF OF POLICE OF TAMPA, FLORIDA, and AS POLICE
OFFICER JOE KAREAS OF THE CITY OF TAMPA, THE CITY OF TAMPA
POLICE DEPARTMENT**

**27. CYNTHIA BARNARD SANZ, Individually, CYNTHIA BARNARD SANZ
AS SPECIAL AGENT SUPERVISION FOR THE FLORIDA DEPARTMENT OF
LAW ENFORCEMENT,**

**28. MR. GERALD BAILEY COMMISSIONER, FLORIDA DEPARTMENT OF
LAW ENFORCEMENT,**

29. CURTIS BAUGHMAN AS Individually, NANCY LOPEZ, Individually, CURTIS BAUGHMAN AND NANCY LOPEZ AS EMPLOYEES OF VICTIMS ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA,
30. MARK A. OBER, Individually and MARK A. OBER AS STATE ATTORNEY OF HILLSBOROUGH COUNTY FLORIDA,
31. CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY FLORIDA CIRCUIT CIVIL, MANUEL MENENDEZ JR. Individually, WAYNE TIMMERMAN, Individually, JUDGE WAYNE TIMMERMAN A CIRCUIT COURT JUDGE OF 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,
32. RAQUEL A. RODRIQUEZ, Individually, RAQUEL A. RODRIQUEZ AS GENERAL COUNSEL TO THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA
33. 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,**

**34. THE FLORIDA BAR, THE FLORIDA BAR OFFICER OF EXECUTIVE
DIRECTOR, THE FLORIDA BAR OFFICER OF TAMPA BRANCH OFFICE
EXECUTIVE/DISCIPLINE DIRECTOR AS BRANCH STAFF COUNSEL, THE
FLORIDA BAR TAMPA INTAKE STAFF COUNSEL EMPLOYEE, MRS.
LIEMAN, MRS "DOE" LIEMAN, Individually, THE FLORIDA BAR TAMPA
INTAKE STAFF EMPLOYEE MS. JANE CRISTY and Ms. JANE CRISTY,
Individually**

35. THE STATE OF FLORIDA, and

36. THE CITY OF TAMPA

**37. THE SHERIFF OF SANTA ROSA COUNTY, AND SANTA ROSA
COUNTY, OF THE STATE OF FLORIDA**

38. HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA

FACTUAL ALLEGATIONS

**39. EACH DEFENDANT SHOULD KNOW THAT THE CAUSE OF THIS
ACTION ARRISED FROM THE INTENTIONAL CONSPIRACY BY RONALD L.
BECK AND TRUSTEES AND PASTORS TO MISUSE THEIR OFFICIAL
DUTIES AND "COLOR OF UNIFORM" OF THE FIRST BAPTIST CHURCH OF
CITRUS PARK FOR UNLAWFUL PRACTICES AND FRAUDS IN VIOLATION
OF FLORIDA STATUES §617 AND THE ACTS OF CHARLES SCRUGGS, III**

AS AN ATTORNEY AND A FORMER JUDGE OF THIS HILLSBOROUGH COUNTY WORKING EXPARTE WITH ATTORNEYS AND JUDGES AND ALLEGED LAW ENFORCEMENT TO CONNIVE AT THE DEFEAT OF THIS PLAINTIFF AS HIS CLIENT TRYING TO PROTECT MR. SCRUGGS “PERSONAL CONVICTIONS NOT TO MAKE A CHURCH LOOK BAD” BUT BY CONCEALMENT OF THE FRAUDS OF RON BECK AND OTHERS ACTING OUTSIDE THE LAWS OF THIS STATE THE COVER UP MAKES ALL LOOK FROM BAD TO WORSE! THE ACTIONS ALSO DERIVE FROM THE INTENTIONAL UNLAWFUL ACTS OF CHARLES DENNY, IV, AS ATTORNEY FOR DEFENDANT RON BECK, RON BECK AS PASTOR KNOWINGLY, INTENTIONALLY, RECKLESSLY AND NEGLIGENTLY ALLOWING UNLAWFUL “BENEFIT OF CLERGY” TO CONSPIRE, CONCEAL AND USE THE UNLAWFUL INTERFERENCE WITH THE CHILDREN OF THIS PLAINTIFF AS THE TOOL OF THE EXTORTION AND PLAINTIFF’S CONSTITUTIONAL RIGHTS AS A FATHER HAVE BEEN VIOLATED AS A “WHISTLE BLOWER” TRYING TO PROTECT HIS AND THE RIGHTS OF HIS MINOR CHILDREN AND OTHERS “RELIGIOUS CONSTITUTIONAL RIGHTS” BUT WERE DEPRIVED OF THESE RIGHTS BY FRAUD AND CONSPIRACY OF EACH DEFENDANT NAMED HEREIN:

1. I have spoken to Ms. Sanz, Mr. O’Connel, Mr. Jay Wilson at the Department of Financial Services, Mr. Moody in the Attorney Generals Legal Frauds Office, Deputy Corporal H. Hoover , Hillsborough County Sheriffs Office, Deputy Joe Gillette, Pinellas County Sheriffs Office and

many others about these June 12, 2006, and Credit Card Bills I recently received from the May 10, 2006, RECORDS PRODUCTION ORDERED by the HONORABLE Judge Marva Crenshaw when she realized the frauds on this Plaintiff were frauds on the truth being told to her court by attorneys (Scruggs, Gray, Turmel Gardner and Denny) as they have done on several courts causing Plaintiff and my family and naïve church family, damage since the September 8, 1999, "SHOW ME THE MONEY" DEMAND MEETING WITH THE "PASTORS SCHISM" at the First Baptist Church of Citrus Park and Citrus Park Christian School. (FBCCP & CPCS) Documents just released show and prove that this Plaintiff was not properly per the State Statues 617 nor per the BY-LAWS REQUIRED PROCESS, NOR PER THE BUSINESS MEETING REQUIRED PROCESS DISMISSED FROM MEMBERSHIP AND THEREFORE HAS THE DIRECT, INDIRECT, AND DERIVATIVE RIGHT TO MAINTAIN THIS LAWSUIT HEREIN AND TO HAVE LEGAL RIGHT TO PRODUCTION OF ALL CORPORATION RECORDS AND THE RECORDS OF ALL OFFICERS AND EMPLOYEES OF THE FBCCP AND CPCS. PLAINTIFF WAS ALSO NOT PROPERLY DISCHARGED FROM THE BY-LAWS PROCESS FROM HIS DUTIES AS LEADER WITHIN THE CORPORATION.

The Statue of Limitations by laws shown herein have not expired!

Plaintiff has clearly now for years over several phone calls and letters to you and others and even in office meetings and court rooms, detailed the same allegations now facing me and my children from abuse of a "pastors

and trustees” lying and stealing from the congregation and my family and my own children and now the abuse of attorneys, law enforcement, judges and several others trying to conceal the “criminal”, “civil” and “BY-LAWS” misconduct of the “pastors Schism” and then their concealment giving “Benefit to Clergy” only let this wild man called a pastor run wilder because “integrity” one expects from a “pastor” is not in him and they assist him to conceal his incrimination of them.

Ms. Sanz, had the audacity to claim that my next statement is an over reaction and rebuked me for even inferring that this could be true and that her apathy and others has let Beck “rape and murder” my family now for 10 years while you people still “Breach your duty” and ignore my “911 calls” for help. She would have arrested me over the phone from the reaction I got from her. Therefore, I consider her and your agents and agencies “unfit for duty” and in “breach of her duty” just as the St. Pete Times, Reported on June 8, 2006, if two Detroit Dispatchers were “CHARGED FOR IGNORING 911 CALL”. Plaintiff alleges that under the Florida waiver –of- sovereign immunity statue Plaintiff has created a “general duty-special duty” distinction and relationship with and to each defendant and agency and department as shown herein.

Where have you been to help me when I reported these crimes to you now over these years and you now have 10 years to see the compiling damages from your negligence.

I repeat Senior Pastor Ron Beck is a real Ken Lay, John Couey or Joseph Smith or worse, all wrapped into one and just disguised as a “pastor” and you are his co-conspirator as you knowingly, intentionally, recklessly and negligently allow his injurious falsehoods to continue to deprive my and my childrens Constitutional Rights for now these 10 years while one gives “BENEFIT TO CLERGY”!

Ron Beck and his “schism” escalated with your help his INJURIOUS FALSEHOODS about me and labeled me an “abuser” when in fact he is the real one doing the abuse as these 10 years prove as proved by his misuse of Designated funds!

In 1999, despite several written letters(Sept/Oct 1999) from my wife Karen Harrod Townsend and her “fear of loosing her job and going to jail for tax fraud and child abuse” as his employee as a teacher at the school, she stayed quiet and helped Beck claimed that his “pastorial counseling” would not let his reveal why Beck had to call me “dangerous” and “abusive” which led to being labeled by his “schism” and the attorneys as a child “molester” as written in the November/December 2003 DIVORCE JUDGMENTS with injunctions craftily done by the attorneys(Scruggs and Turmel) and Judge Timmerman. Her December 2005, recants all the frauds from 1999!

It is your duty to investigate these criminal acts by Sheriff Deputies, and Lawyers and Judges conspiring to keep me from my children as an honorable father now since October 20, 1999, protected in the safety of my

own home as Beck and Howlett and others to conceal the crimes against the Corporation intentionally destroyed the home and safety of this Citizen in violation of our FOURTH AND FOURTEENTH AMENDMENT RIGHTS.

I have not been able to now see my children since November 8, 2002, by the intentional frauds of my own attorneys (Scruggs and Gray with the intentional threat of Judge Timmerman) concealing the violations of the wife and the “pastors schism” and Judges Timmerman, Gomez, Sierra, Stoddard, Menendez Jr., Holder and others of the courts and law enforcement refusing to deal with the frauds of the “pastors schism” and cover up by Attorney Scruggs still trying to “protect his personal convictions to not make a church look bad” despite prove to him in great detail criminal acts!

This gives “benefit to clergy” violations of Florida Statutes 775.03 and shows prejudice and malicious actions by Scruggs and Gray against me and my children as clients. Beck saw the Eminent Domain money for the 7705 Gunn Highway property as his personal gift (at or about \$600,000.00) from the County and he tried to use it to buy his a new parsonage (the Earl property) and claim that he wanted to build a Church/School where he fully knew the Multiple County and State agencies and Associations would not allow the Master Building Project to be built! He knew this would allow him and his co-pastor Herman Meister and Trustee’s Leatherman, Howlett, Smith and Jeffers, to fraud the County,

General Voting member, Courts and this Plaintiff and pad their pockets as records show for these past 10 years.

As the Chairman of the Long Range Planning Committee Beck's frauds had to start against me who opposed his selfish based use of the Eminent Domain money!

Beck had directed by his frauds now 10 years of countless wasted efforts and money just to keep his frauds from totally being revealed.

This also fully shows that Attorney Charles Denny showed "BENEFIT OF CLERGY" in violation of the Rules of Civil Procedure and his Canons by protecting the corruptions of Ron Beck, his client at the expense of his also client the CORPORATION made up of the voting General Members who have had to endure the corruptions of Beck with the "pastors schism"!

Plaintiff has fully documented this in Hillsborough Courts per the cases as stated below and reported this to every State Agency possible.

It was Beck's plan as Herman Meister said in March 2002, "we made a pack to deny and destroy anything you say" to slander Plaintiff as much as it took even to the point as a child molester and abuser of my wife and family these now 10 years to hide his frauds to the family and to the church by his "schism."

Beck has intentionally, knowingly, recklessly and negligently acted to "bury alive" and abused my family and others as these RECORDS prove his acts for "personal gain" of frauds and theft behind the scenes are opposite what he even preaches "of GOD".

Beck's true actions have caused the same symptoms and pains and "loss of life" as of frauds and of rape and murder and has done this now daily for over 10 years to my family and many other victims by his "scheme" of frauds to still get rid of me so he can manipulate his "yes men" as he knew that I as the LONG RANGE PLANNING COMMITTEE CHAIRMAN of the First Baptist Church of Citrus Park since 1993, opposed his using multiple frauds in trying to implement his "sole vision" to expand the Church & School based on his personal greed, ego and pride to be unchallenged at all costs for his ego and "pecuniary profit"!

These June 12, 2006 and Credit Card Bills prove "pecuniary" extortion and countless other criminal acts as shown herein.

The entire "pastors schism officers" had to conceal the frauds in these records to conceal the damages by Beck they had ignored by their "Breach of Duty" to the Corporation Church, me and my family and my Awana Children (225) and Workers and proof of this information in my September 8, 1999, "Show me the money" Demand meeting would have had this entire "schism" fired as Corporation officers and lead to loss of their secular employment as Sheriff Deputies.

This is just the tip of the iceberg!

With documents of all types as proof, Beck's salutations on his letters and "Pastors Pen" weekly bulletin messages of "sharing and caring" is a pure fraud to the truthful actions he does (with his Schism) in his deceptions daily as these 10 years of proofs show his actions "shareless" and

“careless” to the Corporation and hard working families that support his wasteful recklessness always with a self serving financial or ego based motive. He uses the fact he as a “self proclaimed pastor” can just blame the results on his god (self) and then he is above all laws of God or society and people want to naively follow and believe his Pastor image supported by frauds of his “yes men” disguised as Sheriff Deputies(Howlett, Jeffers) and Trustee Gary Leatherman.

Beck’s real actions have been disguised by “Uniformed” Pastors, Deputies, Attorneys, and others (allegedly) in law enforcement and Judges that cover up their own first naïve actions resulting from their first naïve loyal service to him more than seeking “truth” and then are too ashamed to admit they are now a fool covering up for his first fooling them who respect his Title of “Clergy” but don’t know his intent, thus allowing more damages to many innocent citizens!

Your claim that Florida Statue 617 Not For Profit Corporations or the UNIFORM CHILD CUSTODY JURISDICTION ACT has no provision for intervention by FDLE or the A.G. or the State Attorney’s Office for all the criminal acts is false. This month Sheriff Deputies even claim that FDLE has jurisdiction because of how my allegations have been ignored by Deputies of Several Counties and because of the apathy of several agencies and judges!

(1) I just learned this legal position to have you try to explain away!

(2) BECK CHARGED ME UNDER THE CRIMINAL CODES --FLORIDA STATUES 784.046 and 18 U.S.C.§2265 by his INJUNCTION on November 2, 2001, signed at 10:20 A.M. charging me as a Defendant of Criminal Acts he could not prove even by the failure of Scruggs to present my side of the facts in the slightest and reasons to keep the children's mother, Brown, Beck, Meister and Howlett and the naïve members away from my children who were lying to the children and the people and now the courts as their conniving grew to cover up their first frauds as these Production of Document just gained this year PROVE!

(3) With the COURT ORDER OF JUDGE PALOMINO on November 15, 2001, the DUTY OF THE COURTS AND THESE OFFICERS OF THE COURTS AND THESE STATE LAW ENFORCEMENT OFFICERS DUTY TO ME BEGAN TO ME TO ENFORCE THE ORDER OF THE COURT that my rights were violated as Malicious Prosecution, Abuse of Process and Fraud and False statements to the Courts and this was a confirmed act by the words of Judge Palomino that he thought my rights as a father was being hindered!

(4) Had he had a true presentation of the CHURCH RECORDS I JUST RECEIVED then Charles Scruggs would have stopped Beck, the wife and the "SCHISM" and other frauds and even his had he got the Subpoena as my faxed letter to him on November 12, 2001, had demanded for him to do! He could not because he in July 2000, had not reported the Child abuse and the Missing money fraud then.

(3) Florida Statutes 617 clearly leaves intervention controls for stoppage of any and all Corrupt or Criminal Schemes as stated in:

§ 617.0301—“Corporations may be organized under this act for any lawful purpose or purposes not for pecuniary profit and not specifically prohibited to corporations under other laws of this state.” Emphasis added for “any lawful purpose”!

Unlawful must be stopped and the violators in the Corporation and/or the Corporation stopped when it is a front for “unlawful” purposes. Where did Beck and the “SCHISM” get the rights to take away my father/parenting rights just so he could conceal his criminal act?!!!

§617.0503-- allows your agency as the State Law enforcement agency and the Department of Legal Affairs and the Attorney General and the Sheriff and the Courts all have Jurisdiction to insure that all law is followed within Hillsborough County, Florida.

§617.0830(3)—A director is not acting in good faith if he or she has knowledge concerning the matter in question that makes reliance otherwise permitted by subsection (2) unwarranted.” These officers and Trustees have done fraud by false reporting!

THE GENERAL VOTING CONGREGATION VOTING MEMBERS and select Trustee’s and this Plaintiff, in 1995, said for the officers to do “A full review of the Corporation per the By-LAWS” and “to be as pure as the driven snow” to the Laws and for an IRS Audit and this was intentionally and negligently not done by Gary Leatherman, Tim Jeffers and Ron Beck and

Herman Meister and these Trustees and Officers should be sued by the General Voting Congregation as I have been trying to do by going to Attorney Charles Scruggs and Heather Gray and others for their violations of law as officers!

It was true in 1995, and more true now that Plaintiff get the chance to see the clearer picture of the frauds in and by the June 12, 2006, Documents and Credit Card Bills.

These Credit Card abusive purchases are not even reported in these EXPENSED items reports given to the Corporation every 90 Days or Yearly as required by Law. More production is necessary but this Corporation NOT FOR PROFIT was and is run worse than any of the nine Kmart's I Managed or of the other over 20 Corporations I have been a part of in the operations of business.

The initial concept of a "NOT FOR PROFIT" CORPORATION is that it is of a "goody type purposes" living even to a higher calling or standard and living above the premisses of Civil laws and therefore meets the standards of Civil conduct.

Statute 617 requires "All" laws of the State and Federal and County governments should be followed by Beck and others of the Non Profit Corporation under 617 and specifically F.S. 895 are stated and these violations by Beck and others can be proved as follows to show active violations of: §784; §787; §812; §817; §827; §836.05; § 837; §838; §843; §914.23; §918; §18 U.S.C; §895.02(4).

Also active violations of these Other Criminal Law or Civil Law violations can be proved to any jury!

FBCCP defendants and attorney and judges actions in previous actions in the Circuit Courts committing torts and misrepresentations of torts and as set forth herein these Florida Statutes:

s. 39 F.S.(Proceedings related to Juveniles); s. 61 F.S.(Dissolution of marriage); All Florida Statutes relating to duties of Public Officers; s.117 F.S. (Notaries Public); s. 415 F.S. (Children’s Protection From Abuse, Neglect and Exploitation); s. 458 F.S.(Medical Malpractice); s.617 F.S.(Not for profit Corporation); s.623 F.S. (Private School); and as employees for FBCCP and CPCS and members assisting to block Corporations records disclosure directly assisting the Directors actions in violation of: s. 617.1601 (Reporting of records); s.617.1602, (Inspection of Records); s.617.0834 F.S.(Duty and Violation of Duties); s. 617.0841 (Duty to Follow By-Laws); s. 617.1605 (60 days end of year reporting requirement or per By-laws) s.617.10 F.S., (members right to be heard before removal in Not For Profit Corporation); s. 784 F.S.(Assault; Battery; Stalking; Culpable negligence); s.787 F.S. (false imprisonment; custody offenses); s. 772 F.S., Civil Remedies for Criminal Practices as; s. 812, F.S.(theft and related crimes); s.817, F.S., (assisting Corporate officers in violation of Fraud and Credit Card crimes); s. 836.05, F.S., (extortion); s. 837,F.S. and 914.13(perjury); s. 914.14 (Witness accepting bribe); 914.21 and 914.22

and 914.23 and 914.25 (treatment of witnesses); s. 843 F.S. (Obstruction of Justice); s. 817.49 F.S. (False report of commission of crimes; penalty); s. 772.102(4), F.S. (as such actions show a pattern of criminal activity); s. 775 and specifically 775.085 F.S. (Evidencing prejudice while committing offense; enhanced penalties); s. 775.089 F.S.(Restitution); s. 402,F.S.(Child Care facilities); s. 827 F.S. (abuse of Children) ; s. 836 F.S. (Defamation and Publications to expose person to hatred, contempt, or ridicule prohibited); s.838 F.S.(Bribery; misuse of public office); s. 839, F.S., (Offenses by Public Officers and Employees); s.843 F.S.(Obstructing Justice) s. 871.01 & 871.02, F.S. (Disturbing Religious and other assemblies); s.877 F.S. (Hate Crimes); s. 895, F.S. (R.I.C.O.); 623 741 s. 768 F.S. (Florida Tort Claims Act); s.918 F.S. (Conduct of Criminal trial [Repeat Violence charges per s. 784 and 18.U.S.C. on November 15, 2001]); s. 943 F.S.(Department of Law Enforcement) other Florida Statues.

Beck is the extreme of being the ego based high roller having always to be poised as better than others (He is rude and talks down to us just the dumb “lay” people as he calls us in the Business Meeting just when we ask the reports have page numbers put on the bottom so we can follow their fast talking and deceptive pace thrown information that doesn’t add up!) in control and don’t “second guess HIM”!

**MY CHARGES IN 1999, BY THE PRODUCTION OF THESE RECORDS
CONFIRM EVEN GREATER THAN I IMAGINED THE ABUSE BY RON BECK,
HERMAN MEISTER AND WILLIAM BROWN AS PASTORS AND CONFIRMS**

EVERY TRUSTEE SHOULD GO TO JAIL WITH THEM FOR THEIR ABUSE OF THE CORPORATION AND NAÏVE MEMBERS ALL THESE NOW 10 YEARS! IF THE BANDAID BANDIT ROBBED OVER 40 BANKS, THESE MEN HAVE ROBBED THE OFFERING PLATES OVER 1500 TIMES AND PUT THE CORPORATION IN EXTREME DEBT WHILE THEY PADDED THEIR OWN POCCKETS TO DO THEIR SCHEMES!

Records show in 1995-1996, money (\$150,000 or more) was missing from the Corporation reporting BY-LAWS process. Records show on September 8, 1999, over \$214,000.00 was not being reported and had not been reported during the previous 2nd, 3rd and 4th Quarterly or Yearly Reports as the BY-LAWS and State Law 617 REQUIRE! And the Credit Card philanthropy never is reported.

Also Beck was presented with sufficient facts during the “Eminent Domain” taking of the 7705 Gunn Highway frontage road property at the site of the Original Citrus Park Baptist Church since the 1940’s, to know the power and dominance of opponents to expanding Northern Gunn Highway. Groups and agencies like Keystone Park Civic Association, Sierra Club, Pinellas County, Swiftmud, EPC and the master Hillsborough County Plan all showed that Northwest Hillsborough County was on the radar of concerns by all the above to protect growth into the Brooker Creek watershed area. The 18105 Gunn Highway property is the middle of that bulls eye and Beck wanted a new parsonage for his family knowing full well the problems of the property!

He refused my reasoning to sit face to face with the community and get their approval for our project before we bought the land.

He foolishly saw the anticipated \$UNKNOWN\$'s Eminent Domain possible payoff at the 7705 Gunn Highway property and let his ego based motives let his mouth talk before engaging the real facts. And to keep his Pastor ego "never made a mistake" image he just twists blame of God that his god (self) was not who was really in control and he lies and frauds at will to any new naïve person caught up by his disguise.

HERE ARE FACTS NO ONE CAN DISPROVE!

From 1996-1999, I gave Ron Beck plenty of chances to "not lie to the people" but he is what he is and will not change as even his own daddy cried on my shoulder at the Citrus Park Mall the last time I saw him before he died, at what he knew his son Ron Beck intentionally did to my family just to get his abusive way by naïve church members.

I grew up on Lake Keystone off of Wayne Road, since the mid 1960's and advised the Long Range Planning Committee and the pastors of my over 30 years personal knowledge of the intensity by these groups to oppose an "intensity growth" project as the Master Growth Plan our Church sought to serve the interests of what would be planned to be the largest private school in Northwest Hillsborough County.

Also as the Northdale Soccer Club Board of Director member as Developmental Coach Coordinator and Registrar, and Founder and Coordinator of a Multi County League of Florida Youth Soccer, all

volunteer, I worked with the Hillsborough County Parks Department on several projects to explore Parks development, including Keystone Park and the South Mobley Road Complex and the Northwest Nature Trail/Bike Routes.

Beck and the pastors were fully aware of the problems in trying to:

- A. encroach on the One house per five acres rule;**
- B. the Brooker Creek water rights issues; and the**
- C. Intensity of the crowded roads; even moving the first plat plan of the Veteran Expressway farther east away from the Keystone Park area**
- D. Protection of the rural scenic Gunn Highway Corridor north towards the Pasco County line from South Mobley Road.**

Beck sought to “kill me and my family” every way he can to kill the messenger of this message so we could not expose or embarrass his ego as his plan exposed the failures as everyone now sees by the March 28, 2006 Ruling of Judge Barton confirming what I have said for over 10 years As Judge Arnold and Margaret Tussing of Zoning ruled!

The most logical position I have been able to come up with now after knowing Ron Beck since high school in the 1970’s and even having his father (Junior Beck) as one of my best friends until he passed was Ron Beck had to deceive and help my estranged wife as his employee to break up my family in order to get all Townsends out of his way to try to “kill the messenger” as the opposition to the frauds of his master plan.

My father and mother pled to Beck several times for his helping not destroying their Grandkids and the marriage but Beck lied to them and did fraud to others to allege his actions were proper as a “pastor.”

Fact is that my dad as an Executive with Kash n’ Karry for over 50 years will testify that Kash n’ Karry has also to build and manage their two stores within the Keystone Park Civic Association Domain at South Mobley and Van Dyke Roads and will show that the plans of Beck would be predicted as a “lost cause” as the County and the Judges have already ruled for years.

Beck wanted the 18105 North Gunn Highway (Earl Property) site first as a parsonage for his crowded family of a wife and THREE Daughters and then years later to build the church/school project because this “HIS Second VISION” plan used up “all the money” and was opposed to the “never borrow any outside money” per the false presentation in the Church Business Meeting by Herman Meister in 1997, “to just buy the Earl Property”! This purchase allegedly used up all “secret” funds from “Closed” School year accounts that I had been trying to unravel since Dr. Berry (School Pastor) had resigned (forced by Beck and Meister) and the money stopped being reported and even dipped into the “Current” year Budgeted Funds of other Line Accounts to scrape together the \$600,000.00 from what I labeled to the people as the “distress sale” by Mr. Tom Earl because he clearly understood the property faults and the church had “quick cash.”

The Original Asking Price on the Market was \$700,000.00 and Mr. Earl had sense of the problems of the property by his trying to sell the property to developers for homes and commercial use that had been blocked by the Keystone Park Civic Association. My notes in the Committee meetings (of Duane Milford, Gary Leatherman, Elbert Nasworthy, Ron Beck, Herman Meister, Bob Giles, Frank Edwards and Randy Townsend) show over 10 serious reasons to not buy the property until we had answers to my questions and a firm agreement with Keystone Park Civic Association and Pinellas County and Swift Mud due to the well fields at the property before we signed the papers!

My position was: (1) we should do a promissory type note with Mr. Earl conditional on the approvals of the Master Project and cooperation of the surrounding agencies (2) meet with these agencies for their approval of the master project before we “finish the purchase.”

The pastors (Beck, Meister, Nasworthy) pulled rank and did fraud to the Corporation and Beck later blamed Nasworthy for not keeping him informed which was a lie known by several people.

Selfish greed was the original basis for his “NEW SECOND VISION” not Church problem issues of the 7705 Gunn Highway site or issues for this 18105 North Gunn Highway site as he wanted the Colonial Style Earl Home and was willing to bleed the entire Church/School “Designated” money to get him into the Earl Home so his “daughters had plenty of bathroom

space” he told me because his parsonage was too small for his D.O.D.O. Club as he bragged (Dads of Daughters Only Club).

After the purchase of the 18105 site, Beck quickly came up with a new plan to pad his pockets and spend tax free another \$25, 000.-\$40,000.00 of money we allegedly did not have left in the Building Funds to remodel the Earl Home. This continued his refusal to openly report the funds again to me as the LRPC Chairman and started his refusal to “show me the money” now a second time as the words from Meister that the “old money” was all spent to buy the property.

To pad his pockets further he had already leveraged a large raise and a larger car allowance in just his short time as the new pastor(since July 1994) and now with these Credit Card Bills it is clear his padding his pockets was even greater than any General Member knew and even me as a member of many Committees and a Budgeting Planner for several Committees CANNOT BELIEVE THE ODIIOUS AND OUTRAGIOUS ABUSE. NOT EVEN IN THE SECULAR WORLD SHOULD THESE EXPENSES BE SO WILD UNLESS YOU WERE THE PRESIDENT OF YOUR OWN COMPANY WITH NO OTHER STOCKHOLDERS! I was repeatedly told we did not have funds for projects in Awana or in the Master Plan Development and then Meister and Beck did their plan.

The entire FINANCE COMMITTEE Budgeting plan in itself when you look at how budgets are inflated and then the money reallocated shows misuse,

fraud and waste by the Finance Committee and Pastors while the Trustees are extremely either naïve or reckless and negligent.

There are substantial proofs that through the wives salaries compared to others in the ministry competitive wages that the Jeffers, Meisters, Beck and even Leatherman violated the guidelines of 617, and 623 and the By-Laws and gained an unfair remuneration for their services and noticeably lack of services for the money they are paid.

This was proved in the August 1999, conversations to these Pastors yet a year later in the Business Meeting when salaries are discussed Herman Meister acts like he is just hearing these Labor issues for the first time.

The philanthropy of Beck in these credit card bills is more than they were paying employees to live on at less than minimum wage for the hours they required!

My services as 100% volunteer 20-40 hours a week scared them to death to not be exposed at what I did for their jobs and it is clearer now that once these records are by COURT ORDER on May 10, 2006, to be exposed that the Financial wizard of these years of frauds, TRUSTEE/Finance Committee/Budget/Personnel/ anything Beck needed to conceal---Gary Leatherman--- resigns and gets out of the Church.

It was Gary Leatherman who sabotaged me and my children the most with Beck and Meister helping Howlett and the estranged wife by his frauds during August 1999-still to this day.

Others this last month have resigned more so than past years!

Violations of Florida Statute 617.1601(1) &(2), Proper and “all meeting of its members” and as Business Meeting Records and “Board of Director Meeting Records” and “accurate accounting records” are shown throughout 1995-2000. Even per the May 10, 2006, COURT ORDER of Judge Crenshaw the compliance was not per the Order or per the Laws throughout Section 617.1601(1) through (5a-f).

The Quarterly Financial Reports in no form show the Credit Card Expenses of these as this July 10, 2006 production of records show and this is a fraud to the General Voting Member and a Odious and Outrageous Surprise for me as one who managed many budgets and expected true accounting.

At Citrus Park, I was even lectured on the need for proper accounting and accurate reporting on each bill I submitted for approval of Long Range Planning or Awana and many times denied purchases of needed books due to “tight funds”. These credit card purchases show no restraints by Ron Beck to be “sharing and Caring” in the matter of outrageous expenses for his own gratification at the expense of the children in the ministry or to the Building program needing \$10,000,000.00 for the MASTER BUILDING PLAN!

My research as per the May 20, 1996, Long Range Planning Plan was the most rewarding way for the Church/School to expand and “stay out of debt” at half the cost of the Beck plan and as was the goal to stay debt free and complete the objectives within the two year plan of having the High

School Graduation of the 12 Grade in 2001 and the objectives of the “April 14, 1996” meeting.

Beck then did intentionally bypass the Long Range Planning Committee and just using his “yes men” (pastors and Leatherman) came up with the “SECOND VISION” to have a need to buy the Earl Home and started lies with Meister that the “12th Grade will not fit on the 7705 property”.

They used frauds to the General Congregation misrepresenting their alleged positions of the Planners (Cogan and Doozan) and the County that I told everyone was a fraudulent position by Beck and Meister based on my personal conversations and facts from these groups.

My personal meetings with Ron Beck showed that a full Growth Master Church/School Plan was not in his “Radar of interests” as he skipped planning meetings and refused to provide input to the Committee and intentionally, knowingly, recklessly and negligently gave false information to the Church/School Committees/Parents, Attorneys, Architects, Consultants and to the Church as he stated from the proofs in the 1996-2000 Church/School BUSINESS MEETINGS MINUTES some of which I just received! EVEN IN THESE CORPORATION BUSINESS MEETING MINUTES IT SHOWS BECK AND LEATHERMAN AND MIESTER “playing dumb” TO FACTS THEY FULLY KNEW AT THE TIME as my many letters reveal.

I have countless facts to show his anger at me for blocking his getting the new parsonage started new acts of revenge.

My Long Range Planning Committee (LRPC) Meeting notes show that Beck fully knew from his 1995 presentation of his FIRST “Vision” to the LRPC in October 1995 through April 15-16, 1996, as he stated in this order:

(Sanctuary improvements, Improve and expand to 12th Grade the High school, improve the nursery and staying on the 7705 Site was in the best interest of the Church/School for the “Master Plan” as the meeting of about 50 Church/School members in the Choir Room with the Church Planner, Dan Maddox of Cogan Industries confirms the “wishes” verses “needs” meeting for the LRPC to process!

In the March 1996, Corporation QUARTERLY BUSINESS MEETING MINUTES, Beck clearly states the LRPC will present the Master Plan to the Church to vote on after we could determine the input in the April 16, 1996, type meetings and after consultation with the Consultants which we still were waiting on information from the EMINENT DOMAIN issues of the widening of Gunn Highway as all during 1996 we were still trying to work with the County Planners as to how the frontage of the 7705 Gunn Highway property would be affected.

The intentional personal attack on me by Ron Beck began in 1996, when I showed him the “recklessness and negligence” of his public statements and I was not going to again read “public statements prepared by pastors” as the January 12-14, 1996, letter from Elbert Nasworthy as Associate pastor gave for me to give to the church as my Long Range Planning Committee required Quarterly Reports as these should be from the

Committee statements and not frauds as the pastors were starting to raise “false hopes” and “false deadlines”. The ego of Ron Beck is a dangerous weapon to those in his way and this pattern shows by his casualties as he destroys more people than he helps. And he helps people only when he needs them or they are “yes” men or women.

The LONG RANGE PLANNING COMMITTEE AGENDA BUSINESS MEETING NOTES OF MAY 20, 1996, SHOWS THE DIRECTION OF THE COMMITTEE and the basis for then the subversive tactics of Ron Beck in opposition to the plans of the Committee to develop the existing 7705 Property and expand in Citrus Park south of South Mobley Road outside of the border of the Keystone Park Civic Association.

The taste of the Eminent Domain money gave Ron Beck an untamed wasteful attitude as confirmed by several letters and even the words of Long Range Committee Member and Mediation Committee Member Duane Milford as my replacement in many duties in (LRPC and AWANA) will testify and as he shared in the Church Business Meeting Minutes Openly many times to try to restrain the “Recklessness” of the pastors.

Also the April 15, 1996, my Letter to Ron Beck started in part his recklessness against me and my family and the actions of my estranged wife confirm his counseling started her deceptions of me and the family were from his same skilled deceptions as shown to the Church family of hiding money and then not giving truthful answers and omitting truthful disclosure. This lead to her secret funds and bank accounts separated

from the family funds and also lead to her lies to her CPA causing tax evasions and tax frauds to me and my parents as co-owners of the marital home that erupted in April 15, 1999, and her final warning to stop her lying to me and to my family and parents. This also revealed her eager willingness to lie with Ron Beck and Herman Meister as her pastors and employers and help the “pastors schism” at all costs even lying to Judges Palomino, Judge Timmerman, Judge Gomez and Judge Sierra and allowing Charles Denny to lie to Judge Crenshaw in the Church case 02-03812, as he alleged in the First Affirmative Defense that the Church just did not want to bring criminal charges against me when there never has been any cause to even consider criminal charges by my actions as known now by the recanted Affidavit of the wife in December 2005, to Judge Holder in case 05-9605.

She then continued her conspiracy with their every act of her being a victim of my alleged “abuse and molestation” until her December 2005, NEW AFFIDAVIT finally reversing her frauds with Beck from the marital counseling since 1996!

ON SEPTEMBER 8, 1999, AT THE DEMAND “SHOW ME THE MONEY” MEETING and BECK, LEATHERMAN, MEISTER, GILES AND BROWN meeting when I said to Beck, “if you take my keys then you are telling me you do not want the truth”!---and he took the keys, and the keys to see these records of June 12, 2006 and the Credit Card production of July 10, 2006, CONFIRM WHY THE MEN IN THAT ROOM ALONG WITH JEFFERS

AND HOWLETT---COULD NOT SHOW ME THE MONEY TRIAL and stay out of jail and also not loose their jobs as pastors and Sheriff Deputies.

These men also could not let the General Voting Members know that due to the Credit Card and Financial violations that they could not let me expose that the property designated for the Awana Children had been “stolen” by Ron Beck, himself for his personal use and that he knowingly lied to me to conceal his act!

These June 12, 2006 and Credit Card Bills show that me being told in August 1999, I could not buy Awana Materials or get a new microphone to replace the “mike” that Beck not Music Minister Dennis Williams had stolen from the Awana Club from the designated money I myself had put in the Church to buy the new system for the Awana Children shows the conspiracy of the Finance Committee, Pastors and Trustees to the entire Awana Club, the Church and to my family! Bill Browns statement, “Didn’t you see the pastors words in the Church Bulletin” on Sunday August 15, 1999, and during that month alleged the Church was way down on the finances and the budget was too tight to buy the Awana supplies! Yet the Church paid outrageous Credit Card Bills and bought sound system equipment that was not even budgeted and took our Awana Designated Assets.

This July-September 1999 period shows over \$2,700.00 of Credit Card Purchases by RON BECK and who know yet how much from petty cash, checks or Herman Meisters school accounts as they traveled together

spending money wildly that stopped me from buying regularly budget items for the Awana Children NEEDS!

They had to escalate the September 8, 1999, injurious falsehoods and frauds that I, “had a nervous breakdown” was “dangerous” and “a liar” and “an abuser” and lead to Beck claiming his personal knowledge of “pastorial counseling” that I was an “abusive child molester” so he had to keep me away from my own children and as he wrote TWO YEARS LATER, in the October 31, 2001, application AFFIDAVITS for a Restraining Order alleging REPEAT VIOLENCE AND STALKING, AND ON THE ESTRANGED WIFES AFFIDAVIT DOMESTIC VIOLENCE AND STALKING to keep me away from where my son went to Bible College at Word of Life in Hudson Florida as that week the Church Youth Group had a planned outing up at that Campus and people might have to come in contact with me and then I could expose the truth that he was not letting everyone know but had been so craftily presented by the ILLEGAL TRAFFIC STOPS OF JOE HOWLETT and the April 2000, “GET YOUR HANDS ON THE TABLE” they presented that I had a “gun and was ready to shoot people” because the lie “he even watches us through binoculars”.

This is also why the estranged wife and mother lied to keep me from Word Of Life and my then adult son to the point that she connived for him to have to leave the program and not graduate after finishing over 90% of the program.

In addition to these frauds of the “MASTER BUILDING AND GROWTH PLAN” was the issues of the “missing money” and wasteful spending and Reckless and negligent daily actions.

The duties I had as a General Voting member and in addition to Long Range Planning Committee Chairman and as Nomination Committee Member and Awana Children’s Program Commander required me to confront Beck , Nasworthy, Brown and Meister over something new almost weekly but then refusal to deal with things let problems just fester longer. These June 12, 2006, Production of Church Documents of 1998-2000, and the Credit Card Billing Statements prove I had great reasons for concern for the “intentional, recklessness, negligent and knowingly misrepresentations and misuse” of the Corporation due to these now proved patterns of selfishness, greed and reckless negligence tort actions also violating Civil Law, Criminal Law, IRS Laws and Labor Laws.

Ms. Sanz, On July 18, 2006, we spoke for over one hour again now detailing for you years of criminal activity that continues a trail now of fraudulent affidavits court transcripts and illegal court maneuvers and INJUNCTION(S) by lies of “a pastors schism” and the estranged wife/employee at that time to hide the Church Corporation frauds that now keep me permanently from my children now since the “pastors schism” started intentional fraud in 1996!

I tried every action you said at our first meeting and jumped through every hoop!

You clearly exposed your double standards and blind eye to the criminal activity when I asked you “what would you do to have stop this being done to you and your children?” You quickly said you would have never let it happen to you. Then you caught yourself when I asked, “who would you have turned to differently that what I have done?

You know that crimes were done and are being done and you ignore my rights as a father still not being allowed to see my children because of frauds as I have clearly defined for you. Your refusal to even look at case files and evidence is a BREACH OF YOUR DUTY and shows frauds by you to say you have no jurisdiction or that the Statue of Limitations have expired. SEE--Florida Statues 617.0503(6)(a) under F.S. §895!

You became rude again when I said certain frauds are extended up to 12 years when concealment has been done by TRUSTEES as Deputies and refused the case cite.

You have refused any and all attempts to show you now the files you said were necessary at our first meeting to prove my case and now that I have these files you ignore again your duty to investigate these criminal acts by Sheriff Deputies, and Lawyers and Judges conspiring to keep me from my children as an honorable father now since October 20, 1999.

IT WAS MY “RIGHT AND DUTY” TO SEE THESE FINANCIAL RECORDS IN FULL FROM 1995-2006 PER FLORIDA STATUES 617.1602, and the negligence of State Officials to help me to expose these corruptions of this NOT FOR PROFIT Corporatoin and my family to protect us from thieves is

“ODIOUS AND OUTRAGEOUS”! The General Voters are still naïve because of the “schism”!

This is official notice under Florida Statutes 768.28 that you and your agency, Judges, Hillsborough County, the State of Florida, Florida Bar and JQC employees and all others related with this matter will be sued to the fullest extent of the law for your ignoring my pleas and for your tort, negligence, fraud and breach of duty as your refusal to stop the abuse of my children has only prolonged the abuse and agony and unlawful interference with abuse of my children. Your agency and you and the Courts and Law Enforcement have a duty and jurisdiction after talking with multiple law enforcement persons and citizens who believe in the laws you ignore.

Your “double standard” as apathy continues the abuse of my family.

Court affidavits, transcripts and the BUSINESS MEETING records show proofs.

You need to read Chapter 80 & 81 of LIABILITIES OF PUBLIC ENTITIES AND EMPLOYEES.

Even the Florida Supreme Court warns for the protection of society all religious societies must be not given total freedom as has been done for this alleged Church under the direction of Ron Beck and a “schism.”

These alleged “lawyers” are part of the “schism” just continuing the frauds even to the current naïve general members who tried to work thorough me in 1995-current so they could honorably follow the law!

Your position is not true and a threat to the public safety by your refusal and others to do your job and I expect full investigation due to your negligence of the laws and application of court rulings as stated partly herein:

Sections quoted below are from cases and or WEST'S FLORIDA STATUES ANNOTATED CHAPTER 617 CORPORATIONS NOT FOR PROFIT.

THE BY-LAWS and or CORPORATION CONSTITUTION shall be used to show "DUTY" and the "willful misconduct" or violation of a duty of the BY-LAWS Contract.

I. McALISTER v. SHAVER 633 So2d 494(Fla. App 5 Dist. 1994)

CONSTITUTIONAL LAW ¶82(10) "Parent has constitutionally protected inherent right to meaningful relationship with children". "Pastors schism" frauds cost my lost right.

PARENT AND CHILD ¶ 2(3.1) "Only limitation on natural legal right of parent to enjoy custody, fellowship and companionship of children is that, between parent and child, ultimate welfare of child must be controlling".

PARENT AND CHILD ¶2(17) "Visitation with child should never be denied as long as visiting parent conducts himself or herself, while in presence of child, in manner which will not adversely affect child's morals or welfare."

"Pastors schism" frauds cost my rights with my children now since September 8, 1999.

These Church officers and Sheriff Deputies (Pastors Schism) wearing the hat of Church officers and Sheriff Deputies used the fraud and extortion on

the wife and mother of the family children and as an employee of a Florida Statue 623 Private School to conduct her criminal frauds and omissions of truthful disclosure to Judges, Attorneys and the General Voting Congregation. These “schism” members acting under the fraudulent legal advice of Attorney Drew Gardner used frauds (to the wife/employee and to the allegedly independent SCHOOL BOARD and to me) as Employer and Trustees as Deputies and lawyers from September 8, 1999, confirmed by the April 30, 2000, Special Called Meeting, then used the frauds and extortion of other employees of the Florida Statues 617 & 623 Private School and members as Gayle Lynn as Dean of Students and Dr. Lon Lynn as the family medical doctor to continue and conceal the severe abuse of the marital children in violation of Florida Statues 415 and 827 as confirmed by the Doctor reports of Dr. Hoyos and Dr. Millan.

These School Employees and Doctor know these Abusive extreme acts they were doing was harming the family and the children causing great emotional and mental and physical symptoms as reported by Dr. Millan but these Pastors and Teachers continued to prevent this father access to his own children due to the injurious false allegations now proved as frauds by these new affidavits of the employee estranged Karen Harrod Townsend.

These Pastors and Trustee/ Sheriff Deputies used “AD HOC” voting rights and frauds to their own wives as School Board Members

As advised to Charles Scruggs in April 2002 by the letters and as I had pled and warned in July 2000 and in my April 2002, (02-03812) Complaint to the

Court and in the Divorce case of 2003, all the abuse being done to my children was by everyone but me and Scruggs used that to keep me from my children so I could not report his torts in July 2000, when he should have called DCF and turned in the Mother and the “pastors schism”, Dr. Lon Lynn and others.

Attorneys Charles Denny and Stacey Turmel intentionally promoted known fraud.

II. BOARD OF COUNTY COMMISSIONERS v. SCRUGGS 545 So2d 910, 1989, states several practices of the courts and thereby Charles Scruggs as an alleged trained and skilled attorney and as a former Judge was to be working for Randall Townsend and the marital children and had a knowledge and duty under the laws even in cases he prosecuted to protect the parental rights of Randall Townsend and protect the welfare of the mental and emotional and physical well being and “MORALS and WELFARE” of the children.

A. It was the marriage counseling of Beck and Meister starting in 1996, of the employee/estranged wife starting their “pastors scheme” to lie to her to tell her to lie to her husband about the family finances causing tax frauds to and by her CPA and that my personal business lawsuits were not “Biblical”, but then he turns around years later and sues me on false charges and that shows when this trail of BECK started frauds when there is proof that she needed to be “Baker Acted” then that lead to the

additional frauds on my children and myself and then to other employees and then to the courts.

B. On August 11, 1999, these “pastors schism” as reported in the “Church Issues Journal” of September/October 1999, page 41, confirms his pastors counseling and frauds that Beck and Meister then intentionally knowingly, recklessly and negligently even violating the “specific Contract rules of the BY-LAWS” page 9, at Article III, Section 7(G), used her “mental confusion” to cover up their frauds on the Corporation and this father that now in the courts of 2006 has been proved full circle. Beck told this father to resign all his church positions and I refused and confronted him on the “Master Building Plan Frauds” the “Missing Money” and the “Awana Issues” and other negligence acts as violations of ethical conduct per the BY-LAWS that still haunted my versions of facts verses his “FRAUDS AND LIES” as now proved 10 years later, he was guilty then and more so now.

C. Then Gary Leatherman and Dr. Lon Lynn with Howlett and Meister and Jeffers and Smith, and others, knowingly intentionally and recklessly and negligently included themselves in the frauds as confirmed by the letters including the Certified Letter of August 1, 2000, sent after my consultation with Attorney Scruggs, to Beck, Dr. Lynn and Gary Leatherman. They started the extortion and frauds and now all of you are joint tortfeasors to the fact that she lies and uses you to abuse lies and uses you to abuse and destroy my kids still today helped by Scruggs and the “schism”!

A. Her brother (Steve Harrod) and Karen Harrod Townsend even advised the courts and Anchor Court Reporting associates in December 2005, I as this father was under a COURT ORDER that does not allow me to still see my children. They are concealing the criminal acts of Ron Beck, Herman Meister from September 8, 1999, and before and the others of the “Pastors Schism” as Gary Leatherman and Lon and Gayle Lynn, and themselves for over 10 years and their mother and the violence of the maternal grandfather Don Harrod as witnessed by Attorney’s Heather Gray and Stanford Solomon on March 29, 2004, outside the court of Judge Gomez and is proof these children are scared and naïve.

B. PER Wests F.S.A. §95.031, LIMITATIONS OF ACTIONS ¶ 43 “A statue of limitations runs from the time the cause of action accrues which, in turn, is generally determined by the date when the last element constituting the cause of action occurs.”

C. Karen Harrod Townsend has since October 1999, said AS SHE REPORTED IN TRANSCRIPTS AS RESPONDANT SUPERIOR AND VICARIOUS LIABILITY CASES SHOW TO JUDGES PALOMINO AND JUDGES TIMMERMAN AS HER EXCUSES AND REASONS TO GET THE STILL VERY INJURIOUS FALSEHOOD INJUNCTION USING THIS IN January 2006, to Anchor Court Reporting, “my talking about the frauds of the “pastors schism” is why she told Judge Palomino she will not allow me to see my children and then to continue the frauds of the “pastors schism” Joe Howlett as the Sheriff Deputy to cover up his criminal acts as the

deputy with Jeffers and Trustees goes TWO YEARS LATER to Curtis Baughman in November 2001, and files criminal charges against me and then Attorney Scruggs continues the frauds of Howlett, Beck and the Former Wife Harrod, in the Court of Judge Palomino in November 15, 2001 – Now in the court of Judges Timmerman, Gomez, Sierra, Stoddard and Holder because I now have the Corporation Business Documents that prove the “pastors Schisms” frauds and theft in 1998-1999 and since as proved by Judge Barton, March 28, 2006 and these documents of June 12, 2006 and Credit Card bills. Thus Continuation “CONVERSION Liability” and the principle of “CONSCIOUS PARALLELISM”.

D. The FOURTH AMENDMENT protects my legal rights and those of my children to “unreasonable search and seizures” and when Beck, Howlett, Meister, and the Wife and SCRUGGS BY HIS OMISSIONS OF TRUTHFUL DISCLOSURE AS THIS CONCEALED HIS NON REPORTING OF THEIR CRIMINAL ACTS REPORTED TO HIM IN JULY 2000, attempted to get the stalking order to seize my rights as a parent of my children from Judge Palomino as per the rule of an order from an INDEPENDENT MAGISTRATE, THEY LOST, yet the facts show did exactly opposite what Judge Palomino ORDERED and WARNED THEM TO STOP as the transcript shows he cautioned them on interference with child custody issues yet their removal of my children from me got worse as is proved by the Dr. HOYOS and DR. MILLAN REPORTS! Thus they have all been in violation of the Judge Palomino order since 2001 and that includes SCRUGGS, GRAY,

TIMMERMAN, GOMEZ, SIERRA and your department and others blocking my rights as a free parent to my children! Even as a PRO SE, I should have the right to interview my own children so I can clear my reputation from these false charges by the former wife, the pastors schism and the fraud silence by Scruggs and Gray and frauds of others!

E. YOUR frauds of me are allowing the maternal family(HARRODS) and “pastors schism” to still try to put me in Jail as Karen and Beck have violated me and the children now for 10 years and law enforcement does nothing. They (Steve Harrod) said he called the Santa Rosa County Sheriff on me in 2002, the last time I tried to see my daughter (a minor with me with full custody) and they will do it again as they know the actions of Attorney Scruggs and Judge Timmerman show me as a “child molester” in the AMENDED FINAL JUDGMENT FOR DIVORCE WITH INJUNCTIONS as they still brainwash and abuse these mentally and emotionally and physically under nourished children to conceal their years of Child Abuse by the maternal family and Citrus Park Pastors and employees.

F. As this father has said truthfully at every opportunity, it was frauds of Scruggs, Joe Howlett, Ron Beck, Herman Meister, Judge Timmerman, Judge Gomez and Judge Sierra, Attorney Heather Gray, Gary Leatherman, Tim Jeffers, Geoff Smith and attorneys for the Church School Drew Gardner and Charles Denny and attorney for the wife Stacey Turmel, to conspire and make up false charges as alleged to Judge Palomino and Curtis Baughman of Victims Assistance (as Curtis Baughman stated on

March 2006, it was Joe Howlett in November 2001 who filed with him the false police report about me and this brought Curtis Baughman to the Court of Judge Palomino on November 15, 2001). This proves that the charges made by Ron Beck(1999) to remove me from the Church/School duties in violation of the Church BY-LAWS operating under F.S.617, ignored my DIRECT, INDIRECT and DIRIVATIVE RIGHTS per the 617 Laws and per my rights as a Civil Person to be with my children at all times. This proves the interference with Child Custody frauds because on September 8, 1999, when Ron Beck, Herman Meister, Gary Leatherman, Joe Howlett and Tim Jeffers started the frauds of “child abuse” or “or dangerous” or “potentially violent” they then waited until November 2001, to have Joe Howlett as a Trustee and Sheriff Deputy Contact the proper authorities that should have investigated the allegations of Ron Beck and Herman Meister and Gary Leatherman and Joe Howlett and Tim Jeffers in 1999, if there really had been a criminal acts that they truly could allege that I was or had done. INSTEAD SINCE I MADE MY CHARGES IN AUGUST 1999, TO “SHOW ME THE MONEY” these men (Trustees and Deacons and Pastors) without lawful rights have destroyed my family and children as extortion for their cover up of over \$214,000.00 missing money and them in August 1999, refusing to allow me to see the corporation records to conspire to deceive now as the Records show.

II. McCUNE v. Wilson 237 So2d 169 conformed to 238 So2d 306, will show that the alleged expulsion actions of my membership of the

Corporation was not done per the BY-LAWS process or 617 process and was a fraud per their plan of extortion to get me to drop my investigation of the “pastors schism” and trustee violations now confirmed by the June 12, 2006, and Credit Card Documents. I was not advised of this Church announced “Special Called” expulsion meeting in violation of the BY-LAWS process steps and was not present but was slandered by Beck and the Chairman of the Deacons Mike Schumate, to the entire Church on April 30, 2000, per the BUSINESS MEETING MINUTES in the form of a Discipline Meeting to expose all my alleged fraudulent activities and as a continuation of the injurious falsehoods and omissions of truthful disclosure that have slandered my reputation now since September 8, 1999, even causing me to lose my employment and my children. In just receiving this June 12, 2006, packet of these Business Meeting Minutes now for the first time, my knowledge of the “slander and libel” was just learned regarding this publication done to inflict great wrath from people on me and as now these Produced Documents that I only told the truth to the Congregation and these “pastors schism” were the frauds. The alleged “pastoral privilege” of his marital counseling is what Beck used to inform and infer that I was “abusive” and a “molester” per the words used even to the Church and to the Courts and until this is cleared up, I am disgraced.

III. Florida Statutes §775.03 states: “NO BENEFIT OF CLERGY”.

IV. CHARLES SCRUGGS AS MY FAMILY ATTORNEY Since 2000, HAS BEEN ONE OF MY BIGGEST ENEMIES BY HIS CONCEALING HIS FRAUDS OF HIS “PERSONAL CONVICTIONS TO NOT MAKE A CHURCH LOOK BAD”

A. In July 2000, when at the guidance of real Pastors of Idlewild Baptist, I hired Charles Scruggs and did everything he said the court would allow me to do until he was fired on September 30, 2003. This was a lie as he was protecting his “personal convictions to not make a church look bad” and did not disclose this until September 30, 2003, when I immediately fired him and advised Judge Timmerman of the Charles Scruggs, former wife and Attorney Turmel frauds to his courts. Judge Timmerman and Judge Gomez then conspired with Scruggs and Gray and ignored my parental rights to conceal the frauds of Attorney Scruggs since July 2000, that today he still tells lies to the courts now in 2006,(February 9, 2006 transcript to Judge Stoddard in case 05-0911) which still protect the false injunctions Scruggs caused and got placed on me that still to this day now since October 20, 1999, have interfered with my freedom to see and enjoy peace with my children just to conceal my family being “buried alive” in the red tape and turmoil to allow Charles Scruggs and others to give “benefit to clergy” to conceal the financial theft and the violations of responsible conduct that under Florida Statues 617 and Florida Statues 895 and many others.

B. On November 15, 2001, Charles Scruggs lied to me and my parents who tried to give testimony to Judge Palomino of how the “schism” with

the wife/mother was damaging me and my children and their rights as grandparents but Scruggs sent them away from the view of the Judge and after the hearing lied as to why they did not need to testify. Scruggs also lied to me that even though judge Palomino said “If he wants to see his daughter I, you know, I have a feeling that from what I’ve heard here today and just from what I’ve seen and observed that Mr. Townsend is probably going to testify that you don’t allow him to see his children, and this is the only opportunity that he has to see his children.”

C. Even though the arguments in the transcripts and then the “intuitive” Justice from Judge Palomino, Scruggs lied to me and said I had not rights I could pursue in the courts and therefore it made no sense to keep paying him.

D. In April 2002, when I met again with Scruggs at being served with the Divorce Papers, he reviewed the Divorce Papers and my April 3, 2002, Hillsborough County Sheriff Department Complaint showing Ron Beck had told at least two frauds in the October 31, 2001, Affidavit in case 01-15813, and in the multiple lies in the hearing. Scruggs also took my April 5, 2002, Pro Se letter I had written to Judge Palomino showing the frauds of Beck in the hearing and affidavits and said he would handle it with the Judge and that my contacting the Judge would just upset Judge Palomino against me since I was just wasting his time.

E. In January 2003, Scruggs from January 22, -present has just continued one lie to me and judges and attorneys every since as fully

document in case 05-0911, and Judge Stoddard conspires with Scruggs to conceal the truth!

F. On September 30 2003, Scruggs admitted “his personal convictions” and “I am going to do what ever it takes to make the Judge (Timmerman) happy!” This meant doing the Exparte work to get the at least over 6 Divorce Judgements exchanged between Turmel and Judge Timmerman after Scruggs was FIRED, and assist Attorney Heather Gray to stall the knowledge of their clients, the Circuit Courts and loose the Appeals on the cases, Scruggs had craftily destroyed!

V. LLOYD v. HINES 474 So2d 376, 1985, shows that “LLOYD and HINES” did as Howlett and Jeffers and others as officers in Hillsborough Sheriff’s Office and Pinellas S.O. Internal Affairs and lawyers and judges (as “Dougherty” had actual knowledge of his sheriff deputies was liable under 1983, as a Cause of Action for his concealment of their acts) and continued the frauds and concealed the frauds of Howlett, Jeffers, Corbin, Smoak, Meister and Beck and other officers of the First Baptist Church of Citrus Park to do these multiple crimes as stated herein to chase me in violation of my First & Fourth Amendment rights in their Sheriff Deputies Cars and do illegal traffic stops on public streets blocks away even from the School or Church Property and filed charges against me to the State Attorneys Office and knowingly filed false reports to Judges Palomino, Timmerman and Crenshaw that I was a “criminal” even to the point to

allege a “child molester” while everyone not doing these criminal acts knows these actions are fraud against me and my children.

VI. GATTO v. PUBLIX SUPERMARKETS 387 So2d 377 (Fla. 3d DCA 1980)

HARMFUL OR OFFENSIVE CONTACT--- being pulled over and threatened to be sent to jail is as a “Bodily contact is offensive if it would offend a reasonable person’s sense of dignity”. Even after my visits to S.O. Internal Affairs, Deputies Howlett and Deputies Smoak in August 2002, still Chased me around the neighborhood on public streets and prevented me from Church and School functions with my family with their “COLOR OF UNIFORM” abusive actions showing Fourth Amendment abuse and “alleged traffic stops”. This is even after the Ruling on November 15, 2001, from Judge Palomino in the transcripts saying he found no probable cause for their injunctions and actions since September 8, 1999, at that point and that my “parental rights” were being abused then. Scruggs and Beck and the now former wife and everyone had notice to stop abusing me and my children just to keep the criminal action by “Benefit of Clergy” and of Trustees and of Attorney Scruggs in July 2000, not reporting the severe child abuse then as he by law should have done.

VII. Judge Stoddard is proved to be in conspiracy with Scruggs Ruling in Case 05-0911, by the transcript of February 9, 2006, Confession of Scruggs and then by the May 8, 2006 Ruling that I “did not hire or pay Scruggs enough money to clear my reputation and protect my children”.

This is proved by:

- A. Judge Stoddard on February 9, 2006, interrupted the confession of Scruggs right in the hearing, when he admitted I first came to him to get a subpoena to get the Church records**
- B. Over twenty pages of exhibits of papers and transcripts showing Scruggs had knowledge and an intent to conceal what he knew.**
- C. My certified letter to Dr. Lon Lynn, Ron Beck and Gary Leatherman showing the mental “Baker Act” state of concern for the wife and children pleading for these professionals to help them by this letter was “all I could do” per the advice of Scruggs.**
- D. On May 8, 2006, Stoddard let Scruggs even backtrack on his prior confession and I was denied the right to disqualify the judge or change venue or have an additional opportunity to replead the compliant and add the over 20 other proofs I can show that prove Scruggs intentionally did extrinsic fraud and fraud on the COURT to not just me but on many people!**
- E. My April 5, 2002, Letter to Judge Palomino with the Hillsborough County Sheriff Department Report I filed on the false statements of Beck, alerting Judge Palomino of the intentional frauds by Ron Beck in the Affidavit of October 31, 2001, Attorney Scruggs agreed to contact Judge Palomino and resolve the frauds of Beck to Judge Palomino! I filed a Sheriffs Report on the Matter at D3 on April 3, 2002, and turned it over to Scruggs and he buried this fraud on me and on the courts.**

This is Proving of the frauds of Beck in April 2002, would now not have caused my lost family time and would greatly have prevented my daughter

and son being required to move with the mother in June 2002 and December 2002 as if the Church knew the fraud of Beck to a Judge and their financial frauds and Master Building frauds that Attorney Denny has blocked since August 2002 then this speaks volumes! The files in the court and Scruggs own transcribed words show he had full knowledge of the criminal acts and lied to me these actions were not violations of law blocking me from acting per my rights and per the rights of my children and family.

VIII. 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 doers’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

IX. If the courts held in Life Ins. Co. of Georgia v. Lopez 443 So2d 947, “the insurer had a duty to investigate and take steps to present the beneficiary from harming the insured, by canceling the policy or by warning the beneficiary that no benefits would be payable to any person who murdered the insured” then surely any person or agency who has ignored the “BENEFIT OF CLERGY” law and other civil and legal rights of

me and my children as victims and a “whistle blower” of criminal or reckless conduct is also a “aider and abettors” to continuation of damages and additional criminal frauds and torts of the original frauds of Beck and the Church Trustees actions as Sheriff Deputies “WITHOUT PROBABLE CAUSE” other than conceal their prior criminal acts! Those who ignore the actions of then the attorneys and other judges then continue the damages and the concealment of the frauds against this PRO SE who is still blocked from even taking the testimony of his own children to testify “did your father ever molest you so that the injunctions and the continued abuse by the maternal mother and her family and the pastors schism and the attorneys and judges who allow this can be held responsible for the loss of valuable relationship time as the court warns should not happen in any parent child case?”

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 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!

X. *EXXON CORP. USA v. DUNN* 474 So2d 1269 “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.”

XI. “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 I have tried to get help from has allowed my rights with my children 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 for the First Baptist Church of Citrus Park Corporation who acted outside the LAW and the BY-LAWS and violated me and my children and even her 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 and told me I 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 statue 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 by BECK and MEISTER started against my family in 1996, when Beck and Meister made the pack to get rid of me as LRPC CHAIRMAN and member so 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 and Meister. In 1996, my son, J.D.T was 13 and my daughter, J.G.T., was just 11 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 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 just received on June 12, 2006, for the years of by frauds Ron Beck, Herman Meister, Joe Howlett, Gary Leatherman, Tim Jeffers 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.

XII. 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.¹ At the same time, recovery of damages for emotional distress in a cause of action for another tort remains viable.² Damages may be recovered for emotional distress without a showing a bodily harm resulting from the emotional distress.³ Examples of this include ...certain abusive debt collection practices.⁵ 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.⁷” Per CITY OF DELAND v. FLORIDA TRANSPORTATION AND LEASING CORP 293 So2d 800 (Fla. 1st DCA 1974)

XIII. IT WAS NOT UNTIL THE DECEMBER 2005, THE NEW AFFIDAVIT of the now estranged former wife being forced to answer specific questions that Scruggs and Gray and Judges and Turmel and others as law enforcement and false pastors “that they refused to ask that showed these frauds” started “as the pastors schism” against me on September 8, 1999, that the pastors had “pastorial counseling” knowledge alleged that I was a “child molester” and “abused my children” and was “dangerous” and this allegedly gave Judge Timmerman the reason to put these words despite my advising him of many frauds that the DIVORCE JUDGMENT with injunctions called me a “child molester” by the wife and allegedly gave

Deputies reasons to chase me now since September 8, 1999 and do multiple deceptions of Florida Statues 768 as to even register the former wife properly as an “abuse” victim and kept hers and the children’s address hid from me in October 21-26, 1999, and again in June 2002-January 2004, and kept me from the Doctors of my children still to this day so I can report that the wife and the church and school and the maternal family are the actual child abusers helped by law enforcement and attorneys and judges! See case 05-9605 for her frauds!

XIV. DUE TO THE THREATS AND FRAUDS BY RON BECK AND HERMAN MEISTER AND GARY LEATHERMAN AND TIM JEFFERS AND JOE HOWLETT ON SEPTEMBER 8, 1999, this started:

- A. their intentional calculated malicious infliction of emotional distress**
- B. their intentional calculated malicious infliction of interference with child custody and my child visitation rights in 1000% of my children’s life**
- C. their intentional calculated malicious tampering with witnesses and obstruction of justice as**
- D. and they told the wife as a “teacher” cooperate or be “fired” and she did her acts to others even including still her frauds to the courts and violations of the INJUNCTIONS**
- E. and School Employees at the September 9, 1999, Morning meeting to alert the pastors immediately if Mr. Townsend was seen on the property**
- F. and Beck and Howlett told me that they would arrest me if I came to the property of the Church and School. No one believed me on this threat**

until the July 26, 2001, letter with the Florida Statue §871 “warning attached”. This is attached to the April 2002 Complaint as exhibit and referenced by Beck in the November 15, 2001, transcript to Judge Palomino as Howlett, Beck, Meister, Leatherman, Jeffers and others conspired by their own testimony and actions to keep me from my children and exposing to every one I was not an abuser or molester!

Every one of my alleged options of protections as Government agencies and protections of my rights as a father /child and reputation have been abused and slandered and these men still refused to respond to the full and complete production of documents as ORDERED by the HONORABLE MARVA CHRENSHAW on May 10, 2006 as the production of Business Meeting records and Credit Card records showed more frauds than I even expected against me and the Corporation and my children and the innocent members. This is proved as Florida Statue 768.31 Contribution among tortfeasors still ongoing and accruing! The fact that new agencies or that persons intend to continue these frauds against me and block me taking legal actions by new lies is proof for a jury to decide when the statutes of limitations starts under Florida Law! The DOMESTIC VIOLENCE is because of the now former wife and her actions continue to this day under Florida Statue 768.35 by her causing “physiological injuries” caused to me and the children. Even in the April 2000, Deacons meeting Joe Howlett was there as a Sheriff Deputy to just sit next to me for protection of the Pastors and Deacons and when I reached to the floor to get my notes, Howlett yelled

“get your hands back up on the table” intending to cause fear that I had a gun just to taint the naïve Deacons.

II. PER FLORIDA STATUE 768.35 (3) “Actions for recovery under this section must be commenced within 4 years. The time limit within which an action for recovery runs from the time the last incident of domestic violence occurs.” This continues to this day by the FORMER WIFE CLAIMING THE INJUNCTION IS A PERMANENT INJUNCTION and another example of this fact is my attempt in December 2005 to gain the testimony and face to face contact with my children by even trying to GO TO PENSECOLA AND TAKE THEIR DEPOSITIONS WITH A COURT REPORTER AND A SHERIFF DEPUTY PRESENT SO TO GET AROUND THE DIVORCE AMENDED FINAL JUDGMENT INJUNCTION OF NOVEMBER 2003, DONE EXPARTE BY FRAUDS SIGNED BY JUDGE TIMMERMAN WHICH THE NOW FORMER WIFE AND HER BROTHER ARGUED TO JUDGE HOLDER AND JUDGE ARNOLD IN DECEMBER 2005- JULY 2006, STILL BLOCK ME FROM SEEING MY CHILDREN! Attorney Gray in January 2004, said I could be arrested for violation of this Court Injunction. This continual fraud by the wife/former wife/mother started in 1996, with the marital counseling and the frauds by Beck and Meister in the Business Meetings about the Financial Frauds and the Master Building Plan frauds as an employee she received from Beck and Meister and Leatherman and Howlett and Jeffers and others and then by Gayle and Lon Lynn and the attorneys and Judges and the apathy of these agents and agencies I will prove in lawsuits.

III. THIS FRAUD STILL CONTINUES TO BE CONCEALED BY ATTORNEYS SCRUGGS AND GRAY AS NOT THE TRANSCRIPT OF SCRUGGS ON FEBRUARY 9, 2006, TO JUDGE STODDARD AND NEW FRAUDS IN HIS EXCUSES AND PROOFS OF FRAUD TO JUDGE STODDARD!

IV. FDLE and those of the Attorney General office and the Pinellas Sheriff's Department or the State Attorneys office or the Florida Bar, or the Judicial Qualifications Commission or the Legal Advisors office of the Governor Raquel Rodriquez, or the Judges that have heard the issues of this Case---IF I EVEN LISTEN TO YOUR EXCUSES THIS MONTH THAT THERE STILL ARE NO CRIMES TO INVESTIGATE DESPITE THE CHILD ABUSE, FRAUDS AND STILL NOT FULL PROOF OF THE MISSING \$\$\$\$ I SOUGHT SINCE 1997 AND THE TRUSTEES FOR THE CHURCH PER THE COURT ORDER STILL HAVE NOT RESPONDED WITH THE PROPER RECORDS AND PROOFS AS REQUIRED BY FLORIDA STAUTES 617.1605 production for Members now per a court order of May 10, 2006 for the 1998-2000 records. It appears violations of 617.1601-617.1605 still are ongoing and showed 617.0833(Loans to directors or officers). This is one of just the hundreds of laws violated that still keeps me from seeing my children and them in fear without the threat of the maternal family using the frauds supported to her by Scruggs and Gray and Turmel and Judges Timmerman and Gomez and now Judge Holder that have not convinced her that she is in violation of the courts that have any integrity and that her frauds do not

conceal her actions that are not barred by Res A judicata, nor any other procedure as she intentionally conspired and did fraud since the beginning.

V. YOU CAN SAY THERE ARE NO CRIMES BUT MY COMPLAINTS CAN SHOW UP TO 100 COUNTS OF CIVIL AND CRIMINAL CHARGES!

VI. The marital domestic abuse came from fits of rage by the employee/now former wife(in need of being Baker Acted) as proved by several family letters and the verbal testimony of the children then and more proofs are available if I ever get to talk or depose more from them even today as a father kept from the fear of being arrested by the threats of Scruggs and Attorney Gray in January 2004, per the memo “do not go to Pensacola until the Judge Timmerman ORDER is overturned” in the Appeals process.

VII. Attorney Gray sabotages with the help of Scruggs, Turmel, Judge Gomez and Judge Sierra (refusing even to grant a Hearing General Master and returning by J.A. Annice Gunn, (“claiming the Judge said he wishes he could help you because he sees the wrongs but he does not have jurisdiction now that the appeal has been filed”) the proper forms I gave to Judge Gomez with the proper EMERGENCY MOTIONS AND PETITIONS AND VERBAL TESTIMONY—when they know the EXPARTE frauds of Timmerman, Gray, Scruggs, Turmel even on over 20 points of Appeal rights and that the Garnishment was excessive and the Divorce Judgement filed with the Clerk has pages missing from the Court order) and continuing lies

to the courts of Beck and Meister and Howlett through the words of Attorney Denny in the First Affirmative Defense and verbal frauds to Judge Crenshaw and the lack of law enforcement to do nothing to help as I begged or to investigate! Scruggs even blocked Guardian Attorneys and a DCF investigation so I COULD HELP MY OWN CHILDREN AS MY TESTIMONY TO JUDGE TIMMERMAN on January 30, 2003, "GET MY KIDS AND WIFE COUNSELING" and NOT BY THE LIARS "pastors schism" that now these records prove abused me and my family and church.

VIII. On October 10, 1999, a decision had to be made to allow me to live in my own home and provide safety for the marital children in their own beds if they wanted too without fear from the mother and Beck and Howlett and others trying to arrest me on false charges are now proved! The October 10, 1999, statement by the now former wife was "how can you be so right and these six men be so wrong". I said "because I am not the one who is lying to put money in my own pocket. I am just telling the truth to protect the Church Corporation and my family in the long run of telling the truth and stop the frauds." Therefore the October 11, 1999 letter was given to the Wife that for the safety of the family she needed to leave the home and get mental help for the protection of me and the children and stop being a victim of Beck and others including her mother and brothers. Based on knowing the law now she should have been "Baker Acted" but Beck and Meister and Howlett and Scruggs, Denny, Turmel and Gray and Judges did more frauds as proved by the January 30, 2003, transcript using this

October 11, 1999, totally out of context by Judge Timmerman who ignored the true evidence Scruggs intentionally would not or could not ever present or this sends Scruggs to jail for concealment of child abuse and loses his alleged honest standing in the courts he knowingly manipulated to conceal his personal convictions.

IX. Florida Statutes 768 provide that these Deputies, Judges, Attorneys and others acted to use knowingly, intentionally, recklessly and negligently by actions of tort concealment of truthful disclosure and omissions of truthful disclosure to give "Benefit of Clergy" by frauds to do frauds to conceal what these CORPORATION BUSINESS RECORDS show was reason to bring charges against these Trustees and Pastors and other officers in 1999 and still to this day as they conceal their frauds and used this concealment by the coercion and extortion as shown herein. Cindy Sanz, you knowingly let these false charges continue to harass me now since our first meeting and you had a duty then to investigate and by non action allow "omissions of truthful disclosure". Let the jury decide who is guilty as they accomplish to destroy my civil and parental rights just like "Daugherty" as the law enforcement supervisor let criminal conduct be a fraud on the courts.

X. MT. OLIVE PRIMITIVE BAPTIST ET AL v. HARRIS et al. 860 So2d 520 (Fla. App 1 DIST. 2003) gives me rights I try to enforce.

"RELIGIOUS SOCIETIES ¶31(4) Church representatives' complaint against church and its pastor, asserted by representatives as individuals on

derivative basis on behalf of church, set forth sufficient allegations of ultimate fact to withstand motion to dismiss for failure to state a cause of action, ...”

VII. FLORIDA STATUES 617.0834, Abuse of my father/child civil rights! Florida Statues 617.0834 infers 1. the violations of “Criminal Laws” “estops that officer or director from contesting the fact that his or her breach, or failure to perform, constitutes a violation of the criminal law...” “2. A transaction from which the officer or director derived an improper personal benefit, either directly or indirectly” or 3. “Recklessness or an act or omission which was committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.” Are grounds for investigation and potential criminal or civil charges for violations of Criminal laws or the BY-LAWS. The fact that all that has been done by these “Pastors and Officers” to ignore my questions of “show me the money” is proof for me and should be for anyone that I had to loose my family and get a subpoena now years later that where there is smoke there is fire.

Even since the Order from Judge Crenshaw on May 10, 2006, the lead Trustee/Finance Person Gary Leatherman has reportedly resigned and left the Corporation and it was his lies to me in 1999 in my own living room conspiring with Ron Beck and others that admitted secret accounts hid from his Finance Committee and frauds to the Corporations by the “pastors schism” and including himself and the trail of frauds by him in the

BUSINESS MEETING MINUTES shows an enormous trail of frauds of the Corporation and of me and my children and the general voting members being deceived. The frauds by Gary Leatherman corrupted the Corporation now since 1995.

The ORDER from Judge Barton in March 2006, even denying again the “Special Use Permit” as Townsend said in 1997, would never happen regarding the 18105 North Gunn Highway Property is proof of “RECKLESSNESS AND NEGLIGENCE AND INTENT TO FRAUD” and these “pastors schism” used my family to conceal and continue their “scheme” of padding their pockets, violating IRS Rules, Labor Laws, Civil Laws and Statutes and illegally changing the Corporation By-Laws(617.1002) and other acts to even use attorneys, deputies, judges and others and your apathy to do more frauds to use “Benefit of Clergy” and violations of a Not for Profit Corporation to pad their personal pockets! I got more cooperation from Law enforcement back when I ran Northdale Soccer Club and saw theft in the petty cash box and the Concession Stand than now from Law Enforcement or the Courts. This shows me a conflict of interest and a “Benefit of Clergy” and a prejudice to protect the misuse of the “color of uniform” breach of duties!

HERE ARE JUST SOME OF THE LAWS THAT HAVE BEEN VIOLATED AS NOW REPORTED IN CASES AS STATED!

FAMILY COURT—

01-15813, Beck Et al. v. Randy Townsend,

01-15814, Karen Townsend v Randy Townsend

02-4974, Karen Townsend v Randy Townsend

General Civil

02-03812, Randy Townsend v. Ron Beck ET AL.

05-0911, Randy Townsend ET AL v. Charles Scruggs ET AL.

05-9605, Randy Townsend ET AL. V. Karen Townsend ET AL

06-6005, Randy Townsend ET AL v. HEATHER GRAY, ET AL.

AND SEVERAL APPEALS CASES

A. Investigate violations of Florida Statues 895 and who was actually the violator of these Laws and know that I can prove my case now with these facts to show that every law stated in this document can be proved beyond any shadow of doubt. Proof of these violations of Criminal laws show Beck and the “Schism” and those that concealed his frauds get JAIL!

B. and as per Florida Statue 617.0834 (1)(b)1. The Standard for “Criminal Conduct” can be used to show “BREACH OF DUTY” per:

- 1. the Florida Statues violation of these as stated above and herein can be used to show BREACH OF DUTY to the Florida Statue 617 NOT FOR PROFIT Corporation standard of Conduct by violations of Criminal Law**
- 2. the Internal Revenue Tax Law Violations can be grounds for “Breach”**
- 3. Labor Law Violations can be grounds for “Breach”**
- 4. Fraud and Omissions of Truthful Disclosure can be grounds for “Breach”**

5. False Testimony in an Affidavit or Court and Perjury can be Grounds for “Breach”

6. Proof of Child Neglect or Child Abuse or Interference with Child Custody can be Grounds for “Breach”

7. Proof of Credit Card theft and misuse of designated funds can be “Breach”

8. Proof of Negligence and injurious actions violations of duties by the employees themselves as individuals or by respondent superior making the pastors or trustee’s and or corporation vicarious liable and can be grounds for “Breach” as per cases cited in MALICKI and multiple cases.

9. 617.0206 Changes in the By-Laws were not done per the BY-Laws and show intent to conceal activities already done for the protection of the offenders.

C. and as per Florida Statue laws and ASSOCIATIONS AND NON PROFIT CORPORATIONS RULES §71

1. Florida Statue 617.0304(3)

“In a member’s proceeding under paragraph (2)(a) to enjoin an unauthorized corporate act, the court may enjoin or set aside the act, if equitable and if all affected persons are parties to the proceeding, and may award damages for loss (other than anticipated profits) suffered by the corporation or another party because of enjoining the unauthorized act.”

Therefore any agent or agency who has assisted these violations of the “schism” is joint tortfeasor to those who violated their Duty to the

Corporation either under the law or under the Contract Code of the BY-LAWS.

- 2. §71:30 Checklist—Matters to be considered in actions involving Churches or religious societies generally**
- 3. ROSS v. GERUNG (1954, Fla.) 69 So2d 650 "Actions by or against religious societies with members so numerous that it would be impracticable to bring all of its members before the court may be brought as class action."**
- 4. §71:30 Should review (1) Status of Church (2) Facts showing liability of church (3) Facts showing liability of church leaders or members**
- 5. Per 617.0601 state that "notice of meetings and activities of the members must be set forth in the articles of incorporation or in the By-Laws."**
- 6. §71:2 "SUIT v. Gilbert (1941) 148 Fla. 31, 3 So2d 729, states "The constitution and by-laws of an association govern the rights, duties and liabilities of the members and when subscribed or assented to by the members become a contract between each member and the association"**
- 7. §71:2 Surf Club v. Long(1975, Fla App D3) 325 So2d 66 "An organization may not amend its by-laws or constitution so as to impair a member's contractual rights." The events of the Changes to the First Baptist Church of Citrus Park Corporation Constitution, and Policies and BY-LAWS in July 2000, were illegal, intended to divest this members rights, not properly announced to this member who was being chased by Trustees**

as Sheriff Deputies to keep him away from the public meetings, not properly or timely reviewed prior to vote for or by the General Voting Members and intended to evade “illegal” and “Reckless” conduct of “schism” officers frauding the still naïve General Voting Members.

8. §71:3 “To expel or involuntarily terminate a member from a private association...a member need only be given notice and a hearing before expulsion...but it (the hearing) must comport with applicable bylaws or regulations of the association” The production of BUSINESS MEETING MINUTES of June 12, 2006, of the Corporation meeting of April 30, 2000, show that the NOTICE and hearing and vote was done illegally of this members rights and all the while this member by fraud was being asked to wait across the street in his automobile for over 2 hours while the Pastors and Trustees and Sheriff Deputies made Randall Townsend to appear as a criminal stalker and J.D.T. even to witness his father being subjected to this humiliation and slanderous injurious falsehoods by Howlett, Shumate and Leatherman on the front steps of the Church. Note Letter to Beck and compare now to the Business Meeting minutes to confirm events.

9. §71:4 & 71.13--Liability of members---“Individual members of an association can be held personally liable for tortious acts, whether negligent or intentional, which the member committee or participated in or which the member authorized, asented to or ratified. A member may also be liable for failure to act. A member may be liable if that member sets proceedings in motion or agrees to a course of action that culminates in

wrongful conduct. Mere membership does not make all members liable for the acts of others done without their knowledge or approval.” GUYTON v. HOWARD 525 So2d (1988 Fla App D1)

10. MEIER v. Johnston 110 Fla. 374, “For it is conceivable that in a property case even a single party as Representative of the whole membership may sue or defend for the whole.”

11. §617.0503(6) Lists rules of law enforcement investigative conducts for both civil and criminal investigations by the Attorney Generals Office, Legal Affairs or law enforcement agency. Thus the Church or the officers or the members have never been immune as Scruggs, Gray or others listed in these agencies herein have tried to lie to me!

D. PER THE FLORIDA STATUES ALL I HAVE or ever had TO PROVE TO THE GENERAL MEMBERSHIP VOTERS OF THE CHURCH TO HAVE HAD BECK AND OTHERS REMOVED WAS “RECKLESSNESS” OF DUTY and this is even the standards of proof for my civil cases. I could have done that On September 8, 1999, if Howlett was not a Trustee/Sheriff Deputy covering up his own criminal, recklessness breach of duty to both “uniforms” he violated that day!

E. Your criminal case is just as easy to prove if you wanted to just look at the BUSINESS MEETING RECORDS and other proofs as I now fully have prepared but more discovery is just “icing on the cake”.

I have repeatedly over these years contacted each agency as stated and even had officials laugh in my face as to why I bothered them.

Even Ms. Lieman of the Tampa Office of the Florida Bar per the words of her staff, “threw my 100 page complaint with exhibits” in the trash. The JQC and the Governors legal staff also refuse to intervene.

Therefore, per the processes of an alleged “legal system” you will be sued and the public will be exposed to the corruption within this state as every department and official should be removed for not doing their jobs now that they have the facts!

I said in the beginning that the actions of Ron Beck were as of those of KEN LAY and that EN-RON should be our example to END RON.

Now you have many other examples and years of PROOF!

WHILE NO NOTICE IS REQUIRED UNDER Section 1983 Of the Title 42 of the United States Code, THIS IS YOUR OFFICIAL NOTICE PER FLORIDA STATUES 768.28(6)(a) And this letter meets all proper notification formats per section (b).

THE ATTACHED LAWSUIT HEADING WILL BE IMPLEMENTED PER THE LAWS OF THIS STATE TO BE HEARD IN THE COURTS BY THE CITIZENS FOR WHOM YOU WORK AND ALLEGEDLY SERVE.

7. CLAIMANT’S INJURIES ARE:

A. Loss of my time, and rights to live civilly with “freedom of life, liberty and pursuit of happiness” to practice my religious beliefs or see now my children from October 20, 1999, partly till June 2002, with my daughter and till November 2002, with my son and permanently now for both since November 8, 2002, as a father of my two children because of your apathy to

follow the laws of this state and give “Benefit to Clergy” and “misuse of Color of Uniform”,

B. Loss of my esteemed reputation in the public eye as a community servant

C. Loss of my employment and future employment without a tainted reputation from these false allegations and your agencies refusal to follow the law

D. Loss of my home and assets in the marital home required by the forced sale

E. Loss of my physical, mental, emotional well being and society interactions

F. Loss of legal fees, court costs and administrative court fees

G. Loss of Garnished past wages

H. Loss of life free from emotional distress and intentional infliction of emotional distress on me and my children so each defendant could continue their actions of frauds and omissions of truthful disclosure and extortion on myself and my family.

8. The names of the public employees causing the Claimant’s injuries are stated above and herein and some are sued as “DOE” being unknown without additional discovery as select agents refuse to communicate per their agency duties under our Florida Statues who caused this Plaintiff to incur:

A. Assault of good public reputation and defamation

B. Assault of person and violation of Fourth Amendment Rights by the Illegal and unlawful detainment from Sheriff Deputies misusing Color of Uniform to plant false evidence and for personal gain to conceal their frauds and breach of duty

C. Unlawful interference with Child custody and benefit of Child/Father in Society rights and freedoms

D. Unlawful interference with Plaintiff's marriage and the rights therefrom.

E. Unlawful interference with Plaintiff's rights as a FBCCP and CPCS Parent member

F. Unlawful interference with Plaintiff's employment and future employment

G. Unlawful and Negligent retention of employees after being advised of Breach of Duty and Fraud by Employee within the agency, corporation or Department in violation of Respondent Superior and Vicarious Liability Rules and Regulations upon Plaintiff showing causes of "Odious and Outrageous" Infliction of acts in " bad faith, malicious purposes and or wanton and willful disregard of human rights, safety or property." TRACEY v. LUDWIG 604 So. 2d 922 (Fla. 2d DCA 1992)

9. Claimant requests COMPENSATORY DAMAGES that each defendant AGENCY AND CORPORATION FOR FAILURE TO TRAIN AND PER RESPONDEAT SUPERIOR AND VICARIOUS LIABILITY VIOLATIONS OF LAW TO NEGLIGENTLY SUPERVISE AND RETAIN AS STATED in MONELL

v. NEW YORK CITY DEP'T OF SOCIAL SERVICES 436 U.S. 658, 690 98 S. Ct. 2018, 56 L. Ed. 2d 611 (1978) and GONZALEZ v. PUBLIC HEALTH TRUST 686 F. Supp. 898, 899, 900 (S.D. Fla. 1988) and violation of GARCIA v. REYES 697 So2d 549 (Fla. 1997), as this as above and herein has been a violation of the Religious Right of this Plaintiff and his children while each defendant knowingly gave "Benefit to Clergy" and must pay this claim in the total amount of \$28,000,000.00. This figure is based on the allowance of \$2,000,000.00 per year at now (7 seven) for each loss of child (2 two) and will continue to run at \$4,000,000.00 per all future years required for this litigation until just settlement in writing as a release by this Plaintiff of all rights and restored reputation and my reputation tarnished past, present and future and for medical expenses past, present and future to use professionals for medical issues and counseling as necessary to rebuild lost health, both physical and mental and obtain counseling to rebuild lost relationships, by your knowingly, intentionally, recklessly and negligently performing your duties when advised of the frauds of RON BECK and TRUSTEES of the NON FOR PROFIT CORPORATION actions in their COLOR OF UNIFORM DECEPTIONS AS SHERIFF DEPUTIES and then the intentional neglect and breach of duty by each as stated herein assisting Ron Beck, and others as Officers at the First Baptist Church of Citrus Park, Charles Scruggs and other attorneys, deputies, judges and other state officials ignoring their duty per the law and this plaintiff.

10. PLAINTIFF DEMANDS AGAINST EACH INDIVIDUAL DEFENDANT AN AWARD OF PUNITIVE DAMAGES UPON THE FINDING OF A JURY TO ADJUDICATE AND FAIRLY COMPENSATE PLAINTIFF FOR ALL MATTERS AS STATED HEREIN, PERSUANT TO SMITH v. WADE 461 U.S. 30, 55, 103 S. Ct. 1625, 75 L. 2d 632 (1983).

11. The claimant's date and place of birth are January 27, 1959, at Tampa, Florida. The Claimant's Social Security Number will be provided privately upon request. There is no unpaid prior adjudicated claim in excess of \$200.00 owed by Claimant to the State of Florida or any of its agencies, officers, or subdivisions.

Sincerely,

Randall Townsend

P.O Box 21, Odessa, FL 33556

Cell phone 941 350-2677"

D. Page 6. Plaintiff's Claims are Barred by the Statue of Limitation.

Plaintiffs prove herein the causes of actions are not accured but on going in defendants criminal enterprise to defame and extort Townsend ET AL and his facts.

E. Fruility of Amendment –Plaintiffs have proved the facts and laws that show the continuing crimes and torts to not do their common-law duty by all defendants and others DOE to be named when Discovery is complete. That is what defendants fear is exposure for their ongoing criminal enterprise Townsend exposes since 1987.

(4) Conclusion

As a matter of facts and laws this Motion to Dismiss has no legal merit.

Plaintiff's Summary-

1. The Court should take judicial notice also that this Motion to Dismiss was not answered as Defendant(s) to which these Motions allege to protect is stated. The Certificate of Service shows the wrong zip code address and that the Motion was emailed to Townsend. Facts are no email was received and on 7/20/2015, Townsend finally received the envelope mailed on 7/15/2015.

2. The Court should take judicial notice also of PLAINTIFF'S RENEWED SECOND VERIFIED MOTION FOR DISQUALIFICATION OF JUDGE BARBAS AND MOTIONS ETC filed on May 10, 2007, in related underlying case 02-03812 and being again filed as part of this case records as these facts and case laws Meritoriously Apply herein.

F. More TO THE ISSUE OF FUTILITY OF AMENDMENT

1. Is A.S.A. Cridlin willfully and knowingly trying to do FRAUD UPON THE COURT because her illegal co-participants have coerced her into the proved Unconstitutional and Criminal Scheme began since 1987, to "impede" Townsend ET AL ever having our Constitutional Right to a Day in court before a non-biased Judge who should have followed their Oath to the Constitution and rules of Judicial Conduct and without prejudice even recused themselves because they took bribes or Quid Pro Quo benefits

from these proved co-participants and or political contributions from Publix?

2. The applicable Statues and Laws as the 11th Circuit Court of Appeals rulings have found is that the lawyers have been and are in this scheme and Defendant(s) John Grant and his Co-Participants and “Others DOE” ignores the multiple rulings advising them of their illegal, “Bad Faith, Malicious Purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.” Elevate to the point that some have called their frauds and acts of Omission of their Duties as Treason to the Courts and citizens.

3. The FDLE Commanding Officers as briefed as stated in the Complaint Page 26, ¶82-A, “Orlando FDLE office with Senior FDLE Officers, Page 25, ¶ 82-A, “Cindy Sanz (2004) and others of FDLE”, and throughout the Complaint in multiple ¶’s referred to as “Others” or “Others Doe” to as Governor Rick Scott has been alleged to have terminated FDLE Commissioner Gerald Bailey in 12/2014, for acting in Political Corruption(s) rather than use the FDLE to abstain and prevent Government Corruption reported to be carried out in multiple state agencies over multiple counties. The New FDLE Commissioner has been advised prior to the filing of this Complaint but has yet to advise Plaintiff’s of the direction of the FDLE to stop their confirmed Corrupt “malicious purpose” so for this court to dismiss this ongoing matter will be prejudicial to Plaintiffs who have yet per the law to have been afforded full discovery since 11/1987. If the 11th

Circuit Court of Appeals has ruled the lawyers in multiple courts were involved in illegal actions then due notice is given to the Florida Supreme Court and the related agencies, Florida Bar, JQC and FDLE, the Chief Judge and FSCt, Attorney's General, Cabinet and Governor Command and who have had supervision of the termination of Gerald Bailey and the removal of others as Cindy Sanz from the FDLE just as Judge Barbas has had knowledge since about 2006-2007, knowing his co-participant 13th Circuit Court judges (Crenshaw, Stoddard, Gomez, Holder and others refused to rule at key times to avoid direct culpability) for cause per F.S.38.10 had recused themselves.

4. Per the ruling NO:08-10721 (10/6/2008 in Townsend ET AL v. RONALD BECK ET AL Case NO:06-02050-CV-T-30-TGW) of the 11th Circuit Court of Appeals writing Page 5-6: "Townsend argues the district court was biased and prejudiced against him. He argues the district court's statement in the order dismissing the action: "which perhaps amuses or gratifies the plaintiff," was prejudicial and malicious. He asserts the district court had political motives to dismiss the case. He argues the district court was biased because it had become a willful conduit of the "Government Corporate Veil." He alleges the district court joined the "schism" violating his rights.

Recusal is required in certain circumstances, including when the judge "has a personal bias or prejudice concerning a party." 28 U.S.C. §455(b). "The bias or prejudice must be

personal and extrajudicial; it must derive from something other than that which the judge learned by participating in the case.” U.S. v. Amedeo, 487 F.3d 823, 828 (11th Cir. Cert. denied 128S.Ct.671 (2007) (quotation omitted). In addition, any judge “of the United States shall disqualify himself if in any proceeding in which his impartiality might reasonably be questioned.” 28 U.S.C. §455(a). The standard for recusal under §455(a) is “whether an objective, disinterested, lay observer fully informed of the facts underlying the grounds on which recusal was sought would entertain a significant doubt about the judge’s impartiality.” U.S. v. Patti, 337 F.3d 1317, 1321 (11th Cir. 2003) (quotation omitted). The 11th Circuit Court of Appeals even knew of facts not yet known to Townsend and Plaintiff’s which required even certain judges to recuse themselves as even more evidence is hid because discovery, frauds, and prejudice since Judge Powell has been concealed. Even coming to light is the relationships of other Judges as Canady and despite his admissions he omitted his prejudice to conceal his fathers relationship with Govern Chiles and the Chapins and then their alliance with Jeb Bush and “Others”.

5. Immunity therefore is not afforded when the judges do “Fraud on the Court” in collusion to violate 18 USC §1346, willfully and knowingly and recklessly acting to deprive Plaintiff of “Honest Services.”

6. The cases Defendants use to allege their actions are not the torts as Plaintiff's alleged and have had confirmed are insufficient as a Matter Of Law(s).

7. In Ridge v. Rademacher 402 So2d 1312 (1981), the court states:

“We hold that an unsworn statement to a municipal police officer in regard to an alleged crime is not accorded an absolute privilege which will bar, as a matter of law, a subsequent action for slander based on such a statement, particularly when it is alleged to have been maliciously made. Such a statement partakes of a qualified privilege and is a mixed question of law and fact, depending on the actual malice established.”

So in the facts established as these Defendants actions were outside the required Scope of their duties as an agent of their Offices then as “individuals” their malicious torts as established by “WE THE PEOPLE Citizens” are not afforded “absolute immunity” nor any immunity.

8. F.S.876.05 Oath AG-041 06/05/1996 Loyalty Oaths Required for elected officials and six of seven Florida Supreme Court Justices who have ruled in these related cases had not legally taken their required Oaths until 10/2007.

9. ALSO AG-99-57 Oath of Office for Advisory board members shows others are not in lawful compliance with their said Oaths because of their intentional Torts.

10. Additionally Acts in violation of 18 USC 241 and 18 USC 242 make it a criminal act for anyone, whether acting under color of state law or not, to threaten a citizen with any infringement of or penalty for the exercise of any Constitutional right.

11. Additionally, Florida's Anti-Slapp Statue 768.295 prohibits any government entity, including the judicial branch, from acting in any manner to punish a citizen who has "blown the whistle" on any misconduct by the state government.

12. Rule 2.330, Florida Rules of Judicial Administration, required recusal of a judge if "the judge before whom the case is pending... is interested in the result thereof."

13. And per a Florida False Claims ACT they for this reason and others who have proved to have done torts are required to refund their past salaries to the state treasury and thus have a "benefit" gained and "prejudice" to claim there are immune for their Torts which is a "Fraud on the Court" and our citizens.

14. Additionally, any judge who objected to the instructions they were given from their superior Politician and or Judge who controlled their funding and or judicial advancement is prejudiced against Townsend and for whom he speaks and therefor had their "personal gain" prejudice at the time of their rulings as can be shown in more proofs with Discovery the honorable courts are required to enforce.

15. Additionally, FDLE Commissioner(s) Bailey etc. directly promoted

Agent Cindy Sanz to conduct FDLE investigations with “singularity” in this case.

16. Plaintiff’s have a right to fully investigate or be advised as for their defense of the charges that were filed in case 01-15813 and 01-15814 as it is admitted in a transcript by Scruggs, he intentionally failed to provide “Honest Services” due to the involvement of law enforcers. Exposure of what or who made threats on Scruggs goes to Motive, Conspiracy and who were co-participants who caused his admitted ineffective representation.

17. Additionally, upon research of the cases cited in A.S.A. Cridlin’s Motion(s) TO Dismiss, none have met the standard to sufficiently fully oppose the claims of Malicious Unlawful Frauds and Collusions expressed in this case as the standard set even in this same Townsend v. Lane ET AL case as set by the 5th DCA and upheld by the FSCT. In ROBINSON which requires before this Motion To Dismiss can be heard, Plaintiffs are to be afforded Discovery as needed as should have been done in 1989 per the Orders of Judge Muszynski to show the prejudice, bias, financial gains, Malicious Operations and thus Motives of any and all Defendants then and since.

Lastly, it appears in the Certificate of Service that A.S.A Cridlin has:

- 1. Mailed the Motion to the incorrect address in Osprey and then sent another revised envelop;**
- 2. Never sent to Plaintiff at the email Jfyrt59@hotmail.com as email was never received to date.**

3. omitted parties who had previously filed responses in this case but is in exparte and collusion, assisting Tim and Karen Jeffers with her representations as the Tim and Karen Jeffers response to the Summons are deficient and will be attacked directly and independently by Plaintiffs.

18. It should be noted for the record, that Tim Jeffers was timely and properly served in case 02-03812, yet by as Grant admitted judges dismissed and concealed Jeffers due to special favors not as a proper matter of law. This conduct is then an additional Tort from 2003 to again in 7/2015, to be raised as an interference with the Operation of the Religious Contract known as the FBCCP Bylaws as Deputy Jeffers has received illegal benefits at the expense of Citizens Rights to operate per our "Free Will" Contracts Rights and including the FBCCP Bylaws. Plaintiffs ask the court to take judicial notice of Plaintiffs Reponse to other Motions to Dismiss and incorporate them herein.

Respectfully Submitted by:

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

P.O.Box 5 or 333 S. Tamiami Trail, #5

Osprey, Florida 34229

941 350-2677

FOR ALL PLAINTIFFS

Jfyrt59@hotmail.com

www.Judgeoneyourself.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was provided this day of _____ by 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; trammelic@gtlaw.com; moodym@gtlaw.com; richardb@gtlaw.com; lqustofik@pcsonet.com; dconnolly@pcsonet.com; araymond@dglawyers.com; cdenny@dglawyers.com; corourke@dglawyers.com; scruggspa@aol.com; kkharrrod@gmail.com; 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 ____ DAY OF _____, 2015,

BY ID PRODUCED _____

NOTARY PUBLIC: _____

Respectfully submitted,

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

P.O.Box 5 or 333 S. Tamiami Trail, #5

Osprey, Florida 34229

941 350-2677

FOR ALL PLAINTIFFS

Jfyrt59@hotmail.com

www.Judgeoneyourself.com