

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

Case No.2015-CA-001928

Plaintiffs,

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 AND REPLY TO DEFENDANT(s)

TIM AND KAREN JEFFERS JOINT

"ANSWER TO SAID COMPLAINT"

DATED July 7, 2015

COMES NOW, RANDALL TOWNSEND, INDIVIDUAL, PRO SE, AND AS
F.S.617.0834 ELECTED REPRESENTATIVE per F.S.617.022 and states:

1. Per R.O.C.P. 1.140, defendants have failed to state a proper
"responsive pleading or motion" as required in 1.1140.(b).
2. It appears defendants deny all Matters of facts and Matters of Law as
put forth in the complaint without themselves offering any defensive
truthful facts or Matters of Law.
3. Plaintiffs state this alias "answer" is additional proof as to why

Townsend and those for whom he speaks as the true Operation/Owner members of FBCCP/CPCS not of the “Sect”, opposed Tim Jeffers and Karen Jeffers in their attaining “officers and Principal” respective positions they self-empowered to themselves with the “Sect” and Tim Jeffers as an “alias” “Law Enforcer” in collusion with his Superior Officers and others as Defendants herein and “Others Doe”, as Tim Jeffers using his Under Color Of Law alleged “Superior Knowledge” of the law, used his “masked” uniform as a Sheriff Deputy outside of his Pinellas County Jurisdiction to leverage in Hillsborough County what he knew of criminal acts, Bylaws violations, and IRS Tax Evasion done as confessed by FBCCP Administrative Pastor Elbert Nasworthy and Senior Pastor Ron Beck in the FBCCP/CPCS required Quarterly Business Meeting of 10/1994.

4. Jeffers, both for their personal gain then with Nasworthy and Beck and others, breached the FBCCP Bylaws and Townsend’s Nomination Committee Recommendation to the General Membership for a vote and appointed themselves as Tim Jeffers as Trustee and Karen Jeffers as School Principal.

5. Said Breach(s) were brought to the immediate attention of FBCCP Registered Agent John Grant and others of “alias” law enforcers to no avail illegally still to this day in 2015.

6. Further, this alias “answer” demonstrates the arrogance and

incompetence of these defendants that without facts demand their authority despite the code of conduct as prescribed for members per the Bylaws and Florida Statues.

7. This alias “answer” contains misspelled words, “then verses than” and “Osfrey verses Osprey” which due to the talents expected of persons in their assumed position, a higher level of competence was expected and required of candidates the Nominations Committee expected to present for consideration to the Membership for their Confirmation for that of a Trustee or a School Principal.

8. Additionally, in Breach of the Bylaws, defendants herein resort to tortful defamation in the same manner and words used by others of the “Sect” and of FBCCP John Grant, alleging Townsend even after being validated in matters of Facts, Matters of Law and Matters of Risks of these defendants that failed is “an apparent mentally unstable individual” and thus their reasons to in 1999, unlawfully “impede” Townsend from his children, family, Church Duties, Church Members and friends.

9. Additionally, in specific forbidden Breach of the Bylaws, defendants then in 2001, aid and abet Ron Beck ET AL and Karen Harrod Townsend to file the Sham 01-15813 (Repeat Violence) and 01-15814(Domestic Violence) Lawsuits against Townsend which Judge Palomino dismissed in favor of Townsend and also at that time in 11/15/2001 warned defendants to no “impede” with the relationship between Townsend and his children that had been as the court admitted “impeded” illegally despite the ineffective

legal representation of Scruggs ET.AL or GRANT ET.AL. OR DENNY ET.AL. or GRAY ET.AL or any other defendant and Others “Doe” yet to date.

10. Tim Jeffers was properly and Timely served in the underlying case 02-03812, but by collusion was unlawfully dismissed in that lawsuit as admitted by John Grant doing exparte communication with Judge Arnold and Attorney Denny.

11. Therefore, Plaintiffs request this Honorable Court rule this alias “answer” is nonresponsive and rule these Defendants are in Default as a matter of law.

12. Additionally, Plaintiffs request this Honorable Court issue an order requiring Defendant Tim Jeffers and Defendant Karen Jeffers to be found in Contempt of Court, Pay any and all reasonable costs and fees incurred by Plaintiffs, that Tim and Karen Jeffers immediately resign their unlawfully obtained positions at FBCCP/CPCS and properly per the Bylaws subject themselves to the Ecclesiastical Authority Of the true Officers of the FBCCP as Townsend per the Bylaws and State Laws was not properly removed from his Authority since the 9/8/1999 frauds still continuing by Jeffers ET.AL.

13. Plaintiff’s request this Court take judicial notice of Plaintiff’s Response to the FDLE Motion to Dismiss and incorporate said matters herein as in additional support of Plaintiff’s causes.

Respectfully Submitted by:

**Randall Townsend, Pro Se and Per F.S.617.0834
P.O.Box 5 or 333 S. Tamiami Trail, #5**

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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; lgustofik@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 IDENTIFICATON, WHO UPON BEING DULY SWORN AND CAUTIONED EXECUTED AND STATED IN HIS OWN WORDS AND TOOK AN OATH THAT THE STATEMENTS AND THE THINGS CONTAINED THEREIN ARE TRUE AND CORRECT, TO THE BEST OF HIS KNOWLEDGE, INFORMATION AND BELIEF.

**WITNESS MY HAND AND OFFICIAL SEAL THIS ____ DAY OF _____, 2015,
BY ID PRODUCED _____
NOTARY PUBLIC: _____**

Respectfully submitted,

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