

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

RANDALL TOWNSEND,)
 Individual,)
 AND AS “NEXT FRIEND” AND)
 PATERNAL PARENT OF MINOR)
 SON, J.D.T.)
 AND AS “NEXT FRIEND” AND)
 PATERNAL PARENT OF MINOR)
 DAUGHTER, J.G.T)
 AND AS A DIRECT MEMBER)
 OF THE FIRST BAPTIST)
 CHURCH OF CITRUS PARK AND)
 AS “NEXT FRIEND” OF)
 ALL MINOR CHILDREN)
 OF THE CORPORATION)
 KNOWN AS FIRST BAPTIST)
 CHURCH OF CITRUS PARK)
 AND CITRUS PARK CHRISTIAN)
 SCHOOL, INC.)
 Plaintiffs)

CASE NO: _8:06-CV2050T-30-TGW

JURY TRIAL DEMANDED

REQUEST FOR INJUNCTIONS IN

COUNTS—III and XXX and XXI
 and XXXXVI thru XXXXXI.
 AND A WRIT OF PROHIBITION

IN COUNT ---XVI.

v.)

RONALD L. BECK,)
 (a.k.a. Ron Beck) INDIVIDUALLY,)
 REVERAND RONALD L. BECK,)
 AS SENIOR PASTOR, OF)
 FIRST BAPTIST CHURCH OF)
 CITRUS PARK,)
 (Hereinafter as FBCCP),)
 ET. AL. AND NOW As per all as)
 DEFENDANTS Listed Below herein,)

AMENDED FEDERAL COMPLAINT

AS FOR CASES CONSOLIDATED AND REMOVED FROM EITHER:
**IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
 SECOND DISTRICT,**
AND
IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT,
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
 AS STATED BELOW

RANDALL TOWNSEND,

Individual,

DIVISION: K

**AND AS “NEXT FRIEND” AND
PATERNAL PARENT OF MINOR SON, J.D.T.**

**AND AS “NEXT FRIEND” AND
PATERNAL PARENT OF MINOR DAUGHTER, J.G.T**

Plaintiffs, or as Appellants

V.

RONALD L. BECK, (a.k.a. Ron Beck) INDIVIDUALLY,
REVERAND RONALD L. BECK, AS SENIOR PASTOR, OF FIRST BAPTIST
CHURCH OF CITRUS PARK, (Hereinafter as FBCCP)

WILLIAM T. BROWN, (a.k.a. Bill Brown), INDIVIDUALLY,
REVERAND WILLIAM T. BROWN, OF FBCCP AS PASTOR OF EDUCATION
AND ADMINISTRATION;

HERMAN MEISTER, INDIVIDUALLY,
REVERAND HERMAN MEISTER, AS PASTOR OF SCHOOL MINISTRIES, OF
FBCCP;

GARY LEATHERMAN, INDIVIDUALLY,
GARY LEATHERMAN, AS TRUSTEE(1997-2005) AND
GARY LEATHERMAN AS MEMBER OF FINANCE COMMITTEE OF FBCCP AND
GARY LEATHERMAN AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP;

ROBERT GILES, INDIVIDUALLY,
ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, OF FBCCP;

TIM JEFFERS, INDIVIDUALLY,
TIM JEFFERS, AS FINANCE COMMITTEE MEMBER OF FBCCP

TIM JEFFERS, AS FBCCP DEACON

MARK NUNES, INDIVIDUALLY,
MARK NUNES, AS CHAIRMAN OF DEACONS, 1999-2000, OF FBCCP;

MIKE SHUMATE, INDIVIDUALLY,
MIKE SHUMANTE, AS CHAIRMAN OF DEACONS, 2000-2001, OF FBCCP;

JOE HOWLETT, INDIVIDUALLY,
JOE HOWLETT, AS TRUSTEE,(1995-present) OF FBCCP;

GEOFF SMITH, INDIVIDUALLY,
GEOFF SMITH, AS CORPORATION PRESIDENT, AS TRUSTEE (at all times),
GEOFF SMITH AS DEACON OF FBCCP;

DR. LON LYNN, INDIVIDUALLY,
DR. LON LYNN, AS A PROFESSIONAL MEDICAL DOCTOR,

THE SELECT MEMBERS OF THE CORPORATION d/b/a,
FIRST BAPTIST CHURCH OF CITRUS PARK, and CITRUS PARK
CHRISTIAN SCHOOL, (“CPCS”), A MINISTRY OF FBCCP,
CITRUS PARK CHRISTIAN SCHOOL, A MINISTRY OF FBCCP

INDEPENDENT ACTION COMPLAINT PER Fla. R. Civ. P. 1.540

DEFENDANTS

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

CIRCUIT CASE NO. 05-0911
DIVISION G
APPEALS CASE:2D06-2811

INDEPENDENT ACTION COMPLAINT PER Fla. R. Civ. P. 1.540

DEFENDANTS

HEATHER M. GRAY, Individually,
HEATHER M. GRAY, ATTORNEY AT LAW,
HEATHER M. GRAY, PROFESSIONAL ASSOCIATION AS A FLORIDA
CORPORATION,

CASE NO: 06-6005

INDEPENDENT ACTION COMPLAINT PER Fla. R. Civ. P. 1.540

DEFENDANTS

KAREN HARROD TOWNSEND, Individually,
and
STEVEN TYLER HARROD, Individually,
DONALD HARROD, Individually,
NORMA HARROD, Individually,

CASE NO 05-9605 Civil and
02-4974, Family Court
APPEALS CASE: 2D06-3469

SUPPLEMENTAL AND AMENDED PLEADINGS
FILED HEREIN PER
Fla. R. Civ. P. 1.540 and 1.570 and 1.190
BASED ON NEWLY DISCOVERED EVIDENCE
AND THEREBY
ADDING OR REINSTATING OF DEFENDANTS AND CLAIMS

RON BECK, AS PASTOR /MEMBER OF FBCCP AS OF CPCS SCHOOL BOARD,
HERMAN MEISTER AS CPCS SCHOOL BOARD MEMBER,
KAREN HARROD TOWNSEND AS
EMPLOYEE OF CITRUS PARK CHRISTIAN SCHOOL, (CPCS)
A MINISTRY OF THE 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, AS FBCCP TRUSTEE (2005-present)
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
OF FBCCP,

KAREN JEFFERS, Individually,
KAREN JEFFERS AS EMPLOYEE AS PRINCIPLE OF CPCS,
GAYLE LYNN, Individually,
GAYLE LYNN, AS EMPLOYEE AS DEAN OF STUDENTS CPCS,
APRIL BECK, Individually,
APRIL BECK, AS EMPLOYEE OF CPCS
APRIL BECK, AS MEMBER OF FBCCP
JIM LEAHY, Individually,
JIM LEAHY AS PERSONNEL COMMITTEE CHAIRMAN OF FBCCP,
JOE KAREAS, Individually,
MICHAEL JOHN CORBIN, Individually,
MICHAEL JOHN CORBIN AS MEMBER OF THE LONG RANGE PLANNING
COMMITTEE FBCCP,
MICHAEL JOHN CORBIN, AS PASCO COUNTY SHERIFF DEPUTY DETECTIVE,
JOYCE MEISTER, Individually,
JOYCE MEISTER, AS EMPLOYEE OF CPCS
JACKIE HOWLETT, Individually,
JACKIE HOWLETT AS CPCS SCHOOL BOARD MEMBER,
JACKIE HOWLETT AS MEMBER OF THE LONG RANGE PLANNING
COMMITTEE FBCCP,
JOE HOWLETT AS HILLSBOROUGH COUNTY SHERIFF DEPUTY,
MIKE SMOAK, AS Individually,
MIKE SMOAK AS CPCS SCHOOL BOARD MEMBER,
MIKE SHAR, Individually,
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,
JAMES ROLFES, Individual,
A. JAMES ROLFES, AS ATTORNEY AT LAW,
A. JAMES ROLFES, AS ATTORNEY OF 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
THE CHRISTIAN LAW ASSOCIATION, A FLORIDA CORPORATION
DAVID GIBBS, III, Individual,
DAVID GIBBS, III, AS ATTORNEY AT LAW, GIBBS LAW FIRM. P.A.
DAVID GIBBS, III AS ATTORNEY AT LAW, OF THE CHRISTIAN LAW
ASSOCIATION
STACEY TURMEL, Individually,
STACEY TURMEL AS ATTORNEY AT LAW, OF STACEY TURMEL, P.A.,

THE LAW FIRM OF STACEY TURMEL, P.A.
THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA UNDER THE
CARE AND SUPERVISION OF JEB BUSH AND CHARLIE CRIST,
MR. CHARLIE CRIST, Individually,
MR. CHARLIE CRIST, AS IN THE OFFICIAL POSITION AS THE ATTORNEY
GENERAL FOR THE STATE OF FLORIDA,
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 SHERIFF JOE HOWLETT AND
DEPUTY SHERIFF MIKE SMOAK AND
DEPUTY SHERIFF SCOTT WELLINGER, Individually,
SCOTT WELLINGER, AS A HILLSBOROUGH COUNTY SHERIFF DEPUTY
SERGEANT,
DEPUTY SHERIFF LUTHER CORE, Individually,
LUTHER CORE AS HILLSBOROUGH COUNTY SHERIFF DEPUTY DETECTIVE
EXECUTIVE SUPPORT DEPARTMENT INTERNAL AFFAIRS,
DEPUTY SHERIFF PAUL J. GUARINO, Individually,
PAUL J. GUARINO, AS HILLSBOROUGH COUNTY SHERIFF DEPUTY
SERGEANT PROPERTY CRIMES UNIT,
DEPUTY HARRY HOOVER, Individually,
HARRY HOOVER, AS HILLSBOROUGH COUNTY SHERIFF DEPUTY
SERGEANT FOR INTERNAL AFFAIRS,
JAMES (JIM) COATS, AS SHERIFF OF PINELLAS COUNTY FLORIDA,
DEPUTY SHERIFF JOSEPH A. GILLETTEE, SERGENT ADMINISTRATIVE
INVESTIGATIONS DIVISION PINELLAS COUNTY SHERIFF' OFFICE
DEPUTY SHERIFF TIM JEFFERS,
THE PINELLAS COUNTY SHERIFF'S OFFICE
BOB WHITE, AS SHERIFF OF PASCO COUNTY FLORIDA,
DEPUTY SHERIFF JOHN MICHEAL CORBIN OF PASCO COUNTY FLORIDA,
THE DEPARTMENT OF THE PASCO COUNTY SHERIFF,
THE CHIEF OF POLICE OF TAMPA, FLORIDA, and
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. GUY TUNNELL, COMMISSIONER, FLORIDA DEPARTMENT OF LAW

ENFORCEMENT, NOW AS
MR. GERALD BAILEY COMMISSIONER, FLORIDA DEPARTMENT OF LAW
ENFORCEMENT,
THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT
CURTIS BAUGHMAN, Individually,
NANCY LOPEZ, Individually,
CURTIS BAUGHMAN AND NANCY LOPEZ AS EMPLOYEES OF VICTIMS
ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA,
THE DEPARTMENT OF VICTIMS ASSISTANCE
MARK A. OBER, Individually,
MARK A. OBER AS STATE ATTORNEY OF FLORIDA,
CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY
FLORIDA CIRCUIT CIVIL COURTS,
MANUEL MENENDEZ JR. Individually,
WAYNE TIMMERMAN, Individually,
JUDGE WAYNE TIMMERMAN A CIRCUIT COURT JUDGE OF HILLSBOROUGH
COUNTY FLORIDA,
RAUL PALOMINO, Individually,
JUDGE RAUL PALOMINO, A CIRCUIT COURT JUDGE FOR 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,
MARVA CRENSHAW, Individually,
JUDGE MARVA CRENSHAW, 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, MS. "DOE"
LIEMAN,
MS. "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
KMART CORPORATION also d.b.a. SEARS HOLDING COMPANY
JOE PALKO, Individual,
JOE PALKO, EMPLOYEE AS Vice President (Kmart) SEARS HOLDING COMPANY
RANDY BRIGHT, Individual,
RANDY BRIGHT, (Kmart) EMPLOYEE AS REGIONAL COACH,
KEITH JOHNSON, Individual,
KEITH JOHNSON, (Kmart) EMPLOYEE AS REGIONAL HUMAN RESOURCES
DIRECTOR,
SHANE PEARSON, Individual,
SHANE PEARSON, (Kmart) EMPLOYEE AS LOSS PREVENTION DISTRICT
COACH,
KATHERINE CUNNINGHAM, Individual,
KATHERINE CUNNINGHAM, (Kmart) EMPLOYEE AS DISTRICT
COORDINATOR SECRETARY
DANIEL J. GENTILE, Individual,
DANIEL J. GENTILE, (Kmart) EMPLOYEE AS DISTRICT COACH
DOUG LIVINGSTON, Individual,
DOUG LIVINGSTON, AS KMART EMPLOYEE LOSS PREVENTION COACH,
AT STORE 3092,
ROY ALLEN, Individual,
ROY ALLEN, KMART EMPLOYEE AS ASSISTANT COACH, AT STORE 3092,
DR. LINDA ROWE CAMPBELL, Individual,
DR. LINDA ROWE CAMPBELL, (Kmart) EMPLOYEE AS PHARMACIST AT
STORE 3092
BARBARA BOOTH, Individual,
BARBARA BOOTH, (Kmart) EMPLOYEE AT STORE 3092
THE FIRST BAPTIST CHURCH OF CITRUS PARK BOARD OF DEACONS OF
1999-2000-2001-2002-2003-2004-2005-2006
DON BECK, Individually,
DON BECK, AS DEACON,
JOHN COLLINSON, Individually,
JOHN COLLINSON, AS DEACON,
BILL CRAFT, Individually,
BILL CRAFT, AS DEACON,
ROBERT GILES, AS DEACON,
ED HOPKINS, Individually,
ED HOPKINS, AS DEACON,

JERRY MILLER, Individually,
JERRY MILLER, AS DEACON,
WILSON SMITH, Individually,
WILSON SMITH, AS DEACON
AS DEFENDANTS,

UNITED STATES FEDERAL MIDDLE DISTRICT COURT
AMENDED COMPLAINT
AND
DEMAND FOR JURY TRIAL

Plaintiffs, individually and on behalf of all others similarly situated, complain as follows:

NATURE OF ACTION

COMES NOW PLAINTIFF RANDALL TOWNSEND, PRO SE, AND ALWAYS AS A “NEXT FRIEND” AND PROTECTOR FOR THE FIRST BAPTIST CHURCH OF CITRUS PARK BY-LAWS AND THE CHILDREN MEMBERS OF THE CORPORATION AND OF HIS OWN CHILDREN SINCE 1994, OR BEFORE WITHIN PLAINTIFF RANDALL TOWNSEND’S (HEREINAFTER AS PLAINTIFF TOWNSEND) DUTIFUL SERVICES AND STATES TO ALL PERSONS AND AGENCIES AND OTHERS AS STATED AND ACKNOWLEDGED BY RON BECK WHO IN WRITTEN RESPONSE ON SEPTEMBER 13, 1999, WROTE,

“It hurts when a church member you think you have a decent relationship with tells other brothers that he thinks the Pastor needs to resign because he isn’t the man of God for this church.”

And this letter from Ron Beck(Beck) was follow up to Beck on August 11, 1999, telling this Plaintiff Townsend to “resign” all duties because this Plaintiff confronted self-serving pastors with a list of misconduct as violations of the First Baptist Church of Citrus Park Corporation (FBCCP) BY-LAWS(1993), of State, Federal and IRS Laws and

Randall Townsend acting “dutifully” per the Corporation BY-LAWS made allegations of problems, fraudulent inducement and fraud and missing and misuse of Corporation funds, interference with marital and family relationships and “theft” of Church Designated Properties, caused by alleged pastors and others alleged as FBCCP Officers and Trustees.

AND PLAINTIFF TOWNSEND CONTINUES AS PROOF AND STATES HEREIN:

(A) TO STOP ABUSE ON THESE PLAINTIFFS BY ALLEGED “CLERGY AND TRUSTEES” OF A CHURCH WHO FOR NOW DURING THIS OVER MANY YEARS OF LITIGATION, CREATED, EXTENDED AND ALLOWED BY FRAUDS OF JUDGES AND ATTORNEYS AND EACH DEFENDANT HEREIN STILL WILLFULLY ALLOWING ALLEGED “CLERGY AND TRUSTEES” TO “FRAUD AND STEAL FROM A CHURCH” AND “TERRORIZE PLAINTIFF FAMILY RIGHTS, CHURCH RIGHTS AND CIVIL RIGHTS” OF PLAINTIFFS **EVEN AFTER BEING WARNED BY JUDGE PALOMINO ON NOVEMBER 15, 2001, NOT TO KEEP THIS HONORABLE FATHER FROM SEEING HIS OWN VICTIMIZED CHILDREN NOW SINCE NOVEMBER 8, 2002, BY THREATS** AND FRAUDS AND FOR THOSE WHOM PLAINTIFF SPEAKS AND ALL DEFENDANTS CONTINUE TO DO FRAUDS TO THE CHURCH PLAINTIFFS AND TO MISUSE THE CIRCUIT COURTS, DOMESTIC VIOLENCE COURT, FAMILY COURTS AND APPEALS COURTS AND GOVERNMENT OFFICES AND POSITIONS AND

(B) TO CLARIFY PER THIS LAWSUIT GUIDELINES FOR ALL PERSONS IN THIS STATE OF FLORIDA TO KNOWINGLY LEARN HOW TO OPERATE CIVILLY WITH PERSONS OR GROUPS OF PERSONS ATTEMPTING TO ACT IN

VIOLATION OF RULES AND BY-LAWS CONTRACT OF A “NOT FOR PROFIT CORPORATION” ALLEGING TO ACT UNDER FLORIDA STATUES §617, BUT INSTEAD DO “ODIOUS AND OUTRAGEOUS” ILLEGAL CONDUCT ACTING AS, WITH AND FOR “BENEFIT OF CLERGY” AS SHOWN HEREIN AND TO CONCEAL EACH DEFENDANTS ILLEGAL CONDUCT BY GIVING “BENEFIT TO CLERGY” AND DOING FRAUD AND VIOLATIONS OF OFFICIAL DUTY (C) TO PUNISH VIOLATORS OF PLAINTIFFS, THE LAWS, CONTRACTS AND (D) to make 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 under TITLE 18 of the United States Code, which states:

CHAPTER 13,
“SECTION 241. Conspiracy against rights.”

“If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; or

If two or more persons go in disguise on the highway, or on the premises of another, with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured- They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, ...they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.”

“SECTION 242. Deprivation of rights under color of law.”

“Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts

committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.”

“SECTION 245. Federally protected activities.” Stated herein in full.

“SECTION 246. Deprivation of relief benefits.”

“Whoever directly or indirectly deprives, attempts to deprive, or threatens to deprive any person of any employment, position, work, compensation, or other benefit provided for or made possible in whole or in part by any Act of Congress appropriating funds for work relief or relief purposes, on account of political affiliation, race, color, sex, religion, or national origin, shall be fined under this title, or imprisoned not more than one year or both.”

“SECTION 247. Damage to religious property; obstruction of persons in the free exercise of religious beliefs.”

“(a) Whoever, in any of the circumstances referred to in subsection (b) of this section- (2) intentionally obstructs, by force or threat of force, any person in the enjoyment of that person’s free exercise of religious beliefs, or attempts to do so; shall be punished as provided in subsection (d).”

CHAPTER 19,

“Section 317. Conspiracy to commit offense or to defraud United States”

“If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.”

“SECTION 373. Solicitation to commit a crime of violence.”

(a) Whoever, with intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, solicits, commands, induces, or otherwise endeavors to persuade such other person to engage in such conduct, shall be imprisoned... or fined...; or if the crime solicited is punishable by life imprisonment or death, shall be imprisoned for not more than twenty years.

(b) It is not a defense to a prosecution under this section that the person solicited could not be convicted of the crime because he lacked the state of mind required for its commission, because he was incompetent or irresponsible, or because he is immune from prosecution or is not subject to prosecution.”

and per the United States Constitution and the State Of Florida Constitution stating, “NO LAW SHALL IMPEDE THE OBLIGATION OF A CONTRACT” and sues each individual and or person, agent, agency, State of Florida Government Public Entity, Judge, Attorney, Court Officer and or each Corporation as stated herein, pursuant to Florida Statues 768.28(6), and Florida Statues 760 as the HUMAN RIGHTS ACT OF 1977 and Florida Statues 617, as each person, agency and Corporation violated Florida Statues 775.03 and gave unlawful “benefit to clergy” and the fraud and omissions of truthful disclosure of alleged “clergy” allowed alleged “clergy” with these Attorneys and Judges and others now defendants do fraud and theft of and to the Florida Statues 617, **“Not For Profit Corporation”**, and to these Plaintiffs Children as “Minors” as Plaintiff Townsend alleges suffer from “Stockholm Syndrome” or the like and are not of the mental, emotional and physical wellness to represent themselves due to the frauds of Karen Harrod Townsend, Ron Beck, Herman Meister, Gary Leatherman, Joe Howlett, Dr. Lon Lynn, Gayle Lynn and “Doe” as others including School Teachers, Youth Pastors, Church members and employee and the maternal family members assisted by illegal actions of attorneys, law enforcement and judges regulating and controlling their environment and training and for whom Plaintiff Townsend still now for many years still Speaks and makes the following statements in support of the claim:

GENERAL ALLEGATIONS

1. This is now consolidated as a Federal Case Action because Circuit Court, Family Court, Domestic Violence Court and Appeals Court Judges and alleged “Law Enforcement” refuse to stop but even assist ongoing violations of law as alleged herein by Plaintiff TOWNSEND, Pro Se:

(A) AS AN INDIVIDUAL, AND

(B) AS “NEXT FRIEND” AND PATERNAL PARENT OF MINOR SON, J.D.T. AND

(C) AS “NEXT FRIEND” AND PATERNAL PARENT OF MINOR DAUGHTER,
J.G.T, AND

(D) AS A “DIRECT MEMBER” of the First Baptist Church of Citrus Park, (FBCCP)

Acting as “legally” elected as Directly, Indirectly and Derivatively AND

(E) AS “NEXT FRIEND” FOR AND OF ALL THE MINOR CHILDREN of the

FBCCP/CITRUS PARK CHRISTIAN SCHOOL (CPCS), past, present and future

(F) And as a voting Citizen of Florida continuing to hear political speeches, campaign advertisements and promises of what elected Government officials have done or will do and then as Required by their promise or duty as stated herein find these Officials ignore PLAINTIFF RANDALL TOWNSEND (Plaintiff Townsend) as he has been acting since 1995, to enforce contracts and stop abuse, injury, intimidation, fraud, omission of truthful disclosure and threats to all Children Plaintiffs for who Plaintiff Townsend now speaks as victims by ALL Defendants against Plaintiff Townsend as Plaintiffs leader and as a “whistle blower” to illegal, unethical and contractual BY-LAWS violations against all Plaintiffs, and ESPECIALLY THE CHILDREN, by first the collusion of the First Baptist Church of Citrus Park, and Citrus Park Christian School Corporation Pastors, (BECK, BROWN, NASWORTHY and MEISTER) as just in 2006, fully revealed and confirmed by the June/July 2006, Partial Production of Corporation Records demanded in 1999, and or before, and by court rulings and against now all defendants who knowingly, willingly, intentionally and negligently violate laws, contracts, legal duties and even their own alleged ethical, lawful, religious teachings but violating rights of others while at times

relevant herein plaintiffs are: (1) citizens of Hillsborough and or surrounding Counties, of the State of Florida, of these United States of America; (2) and Plaintiff Townsend is as still a loving and legally acting and protecting parent as of a normal father/child relationship; (3) protector of the Church and School Children prior, to the intentional frauds and omissions of truthful disclosure of alleged “schism” “pastors and trustees” now in conspiracy with Thirteenth Circuit Court Judge(s) of Hillsborough County and attorneys and all other Defendants who knowingly, intentionally, willfully, recklessly and negligent conspiracy up and through 09/07/06, and beyond by Attorney Denny still by fraud and violations of legal procedures of the duty of an attorney as acting to conceal truthful legal “DUTY” and accurate FBCCP Church and CPCS School Documents from this dutiful Plaintiff member and other “general voting members” and with collusion by Judge Crenshaw to limit the right of Plaintiff to expose and sue all joint tortfeasors who still “threaten” and abuse and conduct fraud to conceal ongoing frauds of “Clergy” as Beck, Karen Harrod, Meister, Leatherman, Jeffers, Smith, Howlett and others against this Plaintiff Father as Judge Palomino recognized and admitted in open trial on November 15, 2001, in Case NO: 01-15814, Karen Townsend v. Randall Townsend, Domestic Violence Division, addressing Attorney Charles Scruggs, III, Curtis Baughman, Karen Townsend and Randall Townsend stating:

“...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....”

as these and other Defendants, by under oath confession, stated acts of fraud, extortion, battery and omissions of truthful disclosure in the trials of Ron Beck v. Randy Townsend Case NO 01-15813, and Karen Townsend v. Randy Townsend, Case NO 01-15814,

against Plaintiff Townsend as a Respondent and these defendants all who still conspire, damage and even on February 16, 2007, mail a threatening, abusive letter as received from Attorney former Judge, Charles Scruggs III, to Plaintiff, this former client stating:

“You poor crazy sick individual! I received your 40 page “Motion” and as usual, I can’t make anything out of it any better than the Judges, lawyers, public officials, pastors and church members that you’ve included in your Rambling Rubbish. I suggest that you get down on your knees and pray to our Heavenly Father that he take the heavy burden off your shoulders and give you His peace. The plethora of goo which you spout has seperated you from reality. As the young People would tell you “Get a life!” This litigation is consuming you (not to mention the forrest of trees you are destroying in your consumption of (coffee-strike) copy paper. Don’t you have anything meaningful going on in your life? It used to be God but in weeding through your written gibberish you write in you “legal” papers, it would appear you’ve lost sight of the “cross of Christ.” “Let not your heart be troubled” Unless you’ve already gone over the edge, I fear that you are teetering on the brink of insanity. The whole world is against you...right? Do you honestly believe that any of these people (that you’ve sued) gives a tinkers damn about you? Well I do, because (whether you know it or not, you are a brother in Christ and a Child of God and you matter. May our Lord Clear your mind of the abundance of Cobwebs therein and give you peace.”

and doing acts against the Canons, Lawyer/Client Contracts and legal Ethical rules and showing now still his animosity, concealment of his “personal” convictions and frauds but still being concealed, protected and not allowing Plaintiffs to protect and preserve and present their rights as Scruggs and “pastors” and “Schism” members and others as

Defendants herein ignored the letters even written by the Townsend Children stated

Herein : “October 20, 1999”

“Dad,

Please don’t be mad at us! I don’t know what other option I/we have. It’s not fair just not 2 C mome either! N- ways we’ll C U soon + we’ll give U a call later! OK? Take Care of Peaches, Whisper (family cats) + Shaddow (family dog). Jason needs U 2 set up his bunk-bed in his room, If not we’ll get it later + set up the dinette set in the kitchen too!

♥- U ~ C-U Soon

♥ - Jen”

and the October 20, 2001, letter of the son, J.D.T trying to regain a relationship by:

but continually being harassed by the mother, the maternal family and the Schism and THIS LETTER OF J.D.T from away at Bible College but sent to this father 10/20/01, JUST 10 DAYS LATER October 31, 2001—RON BECK AND KAREN HARROD INTENTIONALLY PLACED WORD OF LIFE ON THE **AFFIDAVIT FOR PROTECTIVE ORDER AND GAINED AN INJUNCTION** WHICH PREVENTED THIS FATHER FROM SEEING HIS CHILDREN OR ATTENDING THE WORD OF LIFE YOUTH RALLY JUST SO BECK DID NOT HAVE TO EXPLAIN HIS FRAUDS TO THE CHURCH OR WORD OF LIFE EMPLOYEES WHO WERE QUESTIONING THE ACCUSATIONS BY BECK AND MEISTER AND THE SHERIFF TRUSTEES AND THIS STRESS OF THE ACCUSATIONS OF THE SCHISM EVEN LEAD TO J.D.T DROPPING OUT OF THIS BIBLE COLLEGE JUST WEEKS BEFORE GRADUATION WASTING A FULL YEAR OF CREDITS AND FINANCES LEADING TO NOW PROVED PHYSICAL, MENTAL AND EMOTIONAL STRESS and Defendants conspired with the mother/employee/criminal and instigated, concealed criminal acts, created or still allege that Plaintiff Townsend was/is the “Crazy” one, “Dangerous” and “Unstable” in violation of **RYAN v. RYAN** using “Irreconcilable Differences” as a scheme to conceal the “Schisms”, “wife” and “attorneys” frauds and uses these concealment’s to keep Plaintiff from his children, his Church and proper BY-LAWS and COURT process and did actions to divest Plaintiff Townsend of his family, reputation, employment and still enacted delays, unlawful garnishments, court sanctions, slander and invasion of privacy as still the alleged honorable courts of Hillsborough County Family, Circuit Civil and the Second D.C.A. WILLFULLY ACT TO CONCEAL SCRUGGS, DEFENDANTS, OTHERS AND THEMSELVES:

A. In violation of **STONE Et.al v. WALL Et. al** 734 So2d 1038 (Fla. 1999), June 17, 1999, still Do “interference with the father’s custody and seeking to recover damages, costs, and attorney fees related to the father’s recovery of custody.” And in this case these actions by these alleged “clergy, lawyers and others” intend to permanently by fraud do “interference” until resolved by this Federal Court and as these Defendants conspire and

B. In violation of the **SUPREME COURT APPROVED SIMPLIFIED FORMS July 1993**, APPENDIX 4—INJUNCTION FOR PROTECTION, stating:

“Under Florida Law, courts can make orders to protect people from physical violence of a spouse, former spouse, relative, person living with you now or in the past or the other parent of your child, whether or not you have ever been married or lived together. These orders are enforced by law enforcement agencies.

If you are a victim of any act of violence, or reasonable believe you are about to become a victim you can ask for protection from this violence. You still will have the right to this protection after the person moves out of your residence.

The person asking for the protection is the ‘petitioner/Plaintiff’ and the person who must obey the order is the ‘Respondent/Defendant’.

WHAT KIND OF ORDERS ARE AVAILABLE TO PREVENT DOMESTIC VIOLENCE?

1. If there is an immediate danger of violence, the court can issue an order without notice to the respondent. It will go into effect immediately when the respondent is served. (A Temporary Injunction for Protection Against Domestic Violence (Ex Parte) and Notice of Hearing (Form 16). It lasts until the next court hearing, but no longer than 30 days. In this order, the judge may:
 - a. Tell the respondent not to “contact, molest, attack, strike, threaten, sexually assault, batter, telephone, or disturb the peace of the Petitioner.”
 - b. Order the respondent to move out and not return to your home, and to take only personal clothing and effects.
 - c. Tell the respondent to stay away from certain people and places such as your house or place of employment.
 - d. Decide who has custody and visitation of children.
 - e. Make other orders special to your situation to assure your safety.
2. After a notice to the respondent and a hearing, the court may issue an order effective for up to one year. (Injunction for Protection Against Domestic Violence (After Notice) (Form 17). It can order the items

listed in number 1 and also can order the respondent to pay child support and enter into counseling...Form 17—Injunction for Protection Against Domestic Violence (After Notice). This is the form signed by the court following the hearing. It is effective up to one year, unless the court terminates it earlier or extends it.”

The Exparte actions of Scruggs(fired on September 30, 2003, upon receipt of the **ORDER** of Judge Crenshaw in Case 02-03812, allowing only a Claim of Malicious Prosecution against Beck, individual, Beck as pastor, and the FBCCP Corporation shows her collusion with Timmerman, Gomez, Menendez Jr. and Sierra and others) with Gray and Stacey Turmel as Attorneys for the efforts of the Defendants in disregard for the rights of the plaintiffs and or the ruling of the laws did with the knowingly, intentional, reckless and negligent did conspire with Judge Timmerman even after on March 25, 2003, Scruggs alleged via a **VERIFIED PETITION TO DISQUALIFY JUDGE TIMMERMAN** that **Timmerman was unlawful in all previous alleged court actions** and added the phrases not in the **PETITION FOR DISSOLUTION OF MARRIAGE** but by Collusion of now with Turmel to conceal fraud of her clients even written in the **Petition**. **And supporting affidavits as AFFIDAVIT PURSUANT TO UNIFORM CHILD CUSTODY JURISDICTION ACT (1) “ no” previous court actions on custody even though case 01-15813 and 01-15814 were custody issues and (2) even though no claim to “assets” in the marital home from the affidavit of Karen Harrod Townsend of November 14, 2001, filed in case 01-15814 verses the fraud of the AMENDED and FINAL JUDGEMENT OF DISSOLUTION OF MARRIAGE** stating as records prove specifically prepared and presented to the Court after Scruggs termination and without the notice and or

authority of this Plaintiff who after September 30, 2003, was PRO SE:

(1) **TO THE FRAUD ISSUES OF THE STILL PENDING INJUNCTION ---**

“9. The Wife has requested a mutual injunction be entered by this court restraining either party from molesting, harassing, interfering and or bothering the other party. **It is therefor ORDERED AND ADJUDGED....** Both parties shall be enjoined from harassing, molesting, stalking, and bothering the party either directly, or indirectly or through any third parties. **This injunction shall remain in effect until further order of this Court.**”

NO DOMESTIC VIOLENCE, FAMILY, CIRCUIT, OR APPEALS COURTS NOW WILL OVERTURN THE USE OF THIS DIVORCE **INJUNCTION** GAINED BY NOW PURELY CONFESSED “FRAUD” BY ACTIONS OF PLAINTIFF’S ATTORNEYS, KAREN HARROD TOWNSEND, MEMBERS OF THE CHURCH SCHISM AND LAW ENFORCEMENT TO CONCEAL EXPARTE ACTIONS AND MALPRACTICE WITH THESE COURT JUDGES AND THIS INJUNCTION STILL PROHIBITS THIS FATHER FROM SEEING HIS CHILDREN NOW ONGOING SINCE OCTOBER 20, 1999, WHEN THE MOTHER ADMITTED TO ALLEGING THIS FATHER VIOLATED HIS OWN CHILDREN JUST SO SHE COULD CONCEAL HER TAX FRAUDS AND FRAUDS EVEN TO THE CHILDREN AND OTHER FRAUDS OF THESE PASTORS WHO THREATENED TO FIRE HER AS THEIR “CHRISTIAN” SCHOOL TEACHER IF SHE DID NOT LIE TO ASSIST THEIR ALLEGED LEGAL ACTIONS NOW PROVED AS FRAUDS AND CONSPIRACY TO DEPRIVE PLAINTIFFS WHILE ALLEGING TO ACT AS “CLERGY” IN ALL DUTIFUL POSITIONS TO THE BY-LAWS, AND OTHER LAWS, YET: (1) THE RULINGS OF JUDGE’S ARNOLD AND BARTON THROUGH 2006, AND (2) THE PARTIAL

PRODUCTION OF FBCCP RECORDS OF JUNE/JULY 2006, REVEAL
FRAUDS AND OMISSIONS OF TRUTHFUL DISCLOSURE, AND
“MISAPPROPRIATION OF CORPORATE OPPORTUNITY” AND
MULTIPLE VIOLATIONS OF LAW BY ALL DEFENDANTS AS STATED
HEREIN, AGAINST INNOCENT “GENERAL VOTING MEMBERS” AND
“PLAINTIFFS” BY “SCHISM MEMBERS” AND OTHERS.

(2) TO THE ISSUES OF THE MARITAL ASSETS---

“7. That the parties own the former marital home along with the
Husband’s parents, and therefore the Wife owns a One-fourth interest in said
home. The Husband currently resides in said home and has been paying all bills
associated with this home.” **It is therefor ORDERED AND ADJUDGED...**

“The Wife owns a one-fourth interest in and to the formal marital home
and shall be entitled to receive her interest in a timely manner. The Husband shall
have 90 days to arrange with the other owners to purchase the Wife’s one-fourth
interest in the property and have her name removed from responsibility on same.”

placed in the DIVORCE ORDER WITH INJUNCTIONS and these phrases

not in the filed February/April 2002, **PETITION FOR DISSOLUTION OF
MARRIAGE** gained by the now proved frauds and intentional withholding of the
true evidence by Scruggs that violate his personal convictions to “not make a
church look bad” gave this Defendant Estranged Wife an unjust financial gain of
over \$60,000.00 (allowing wife’s tax fraud, fraud in the home rights and alimony)
and additional yet fully unknown financial losses and parental/child relationship
time, employment and does conceal until this Federal Court intervenes allowing
lower courts and attorneys to conceal criminal acts and still cause violations of
civil rights, custody, visitation, contact and lead to issues of lost employment and
future violations of rights intentionally by attorney Gray to allege “no rights to
appeal any issues in cases 02-4974 and case 02-03812, and did frauds to Plaintiffs

and the Second District Court of Appeals and using still and including the threats made still by deputies and by Attorney Gray threatening Plaintiff Townsend that if in any way Townsend did or was believed to do a violation of the **DIVORCE INJUNCTION** until she had judge Timmerman remove the injunction to fear “arrest” even on false charges made as by the still threats of Attorney Rolfes in November 2006, and now even Attorney Scruggs per the February 16, 2007, letter And Defendants Karen Harrod Townsend and Steven Harrod even made to Judge Holder on June 22, 2006, after the known acts of frauds by Defendants in the hearing on Rules of Civil Procedure 1.540, to reverse and remove the Injunctions as requested in Count Nine of case 05-9605, even after the estranged wife revealed in her new affidavit on December 12, 2005, she never claimed the acts that were used by Scruggs, Denny, Gray, Turmel and Judge Timmerman to cause the Injunctions is the first place alleging even back to 1999, as Karen Harrod Townsend in total contrast to her actions then but now states under oath:

“I did not assert physical harm, (as the copy of the hearing he presented to the court as an attachment shows.) I made no further claims, but filed for divorce and moved to Pensacola at the end of the school year....

...The divorce stipulates a mutual restraining order to prevent harassment, which the deposition proceedings may allow without an attorney or mediator should be present. I cannot afford to hire an attorney. Additionally, now that the plaintiff no longer pays alimony since his job was recently terminated, I need to work more hours to compensate and have little time to negotiate the legal system on my own. Not only am I not financially able, but also cannot risk losing my job by repeatedly taking off from work to deal with extenuated legal issues with the plaintiff.

4.Unwarranted case. It is a means to reopen issues that have already been decided in other courts, as I have asserted in my early request....The questions that have been proposed for deposition are without basis, as no one to my knowledge has alleged physical abuse, only stalking in the 2001 case #01-15814, Division G, to which he refers.”

Plaintiff alleges that the basis for alleging “stalking” and denial of these Plaintiffs

rights as a parent/members at FBCCP and CPCS functions from September 8, 1999, through current times was procured from the fraud just revealed by the production of the June/July 2006, Court Ordered released partial records that shows that as Church/School parents and members that Defendants attempt to suppress, ban or excommunicate Plaintiff Townsend was attempted and done by “unconstitutional” means of the By-laws and State statues and a violation of due process in now proof of the conspiracy to keep concealed the frauds being done to the “General Voting Members” and these Plaintiffs by the alleged lawful acts of the Clergy, alleged Trustees as alleged honorable Sheriff Deputies and now as prolonged by the frauds of attorneys and judges and alleged law enforcement officers all throughout with full knowledge that Plaintiff Townsend has always been an honorable man and by being honorable this will expose the criminal, uncivil and unethical acts of the estranged wife, pastors, deputies, attorneys, judges and others as shown herein by even the “Addendum” Affidavit of Karen Harrod Townsend filed for “Case NO. 01-15814” in November 2001, now proved intending to do “fraud to the court” and to the General Voting Church members in her 8 page Affidavit by stating as follows:

“The Respondent(Randall Townsend) often misreads or misconstrues what people say or do; He calls us liars, and there was no way to prove differently to him. He generally feels that people do things intentionally against him and even plot against him (as with the lawsuits and church pastors.) Since the move out, this seems to have become worse.”

“...The Respondent also displays a compulsive, obsessive personality.”

- C. As alleged Law enforcement officers or State Officials by omissions of truthful disclosure decline to have jurisdiction and refuse to even follow or require the

Divorce Injunction to be followed with phone or visitation of Plaintiffs within themselves as shown:

1. On December 25, 2006, Plaintiff Townsend traveled over 500 miles to Pace Florida to see his children for Christmas and at other times Santa Rosa County Sheriff Deputies again as at other previous times refused to assist Plaintiff Townsend per the INJUNCTION even advising Plaintiff Townsend he'd better Just leave town.
2. In December 2005, Defendant's HARRODS and Judge Holder did impede even Plaintiff Townsend taking the Depositions of J.D.T. and J.G.T and others in Pace, Florida.
3. In 2004, Defendant Gray, Scruggs, Turmel, the State Attorneys Office, the Judges Timmerman, Gomez, Sierra, Crenshaw, and Palomino impeded the Divorce Injunction rights of Plaintiffs as stated in the Injunction, the law, and right to appeal now proved frauds by defendants.
4. Throughout multiple years of demands, contact, and deposing J.D.T. and J.G.T and others, and even production from the office of Dr. Lon Lynn the medical records of J.D.T and J.G.T are denied this Pro Se and Parent Randall Townsend
5. And throughout September 1999, through current times, the "frauds and omissions of truthful disclosure" of Karen Harrod Townsend are honored above the rights of and wishes of Plaintiff's Randall Townsend and J.D.T and J.G.T and others as the letters and actions as exhibits intentions of October, 1999, through current times of J.D.T and J.G.T are ignored and convoluted by Defendants even prohibiting or providing needed immediate medical care for J.G.T., the minor

(17), daughter on November 10, 2002, while the Karen Harrod Townsend as the mother, remained over 500 miles away and by phone impeded law enforcement as reported in Case 02-495771, City of Tampa, Officer J.W. Guzwa, #522, and this father, from seeing or assisting in the needed medical care of his daughter, J.G.T, while she visited in Tampa, on a trip paid for by Randall Townsend and this further lead to needed medical and hospital care of J.D.T, due to the incompetent medical attention as directed by the mother, Karen Harrod Townsend, trying to continue her frauds to law enforcement, the Courts, her employer and manipulation of these children (JDT & JGT) to their detriment and harm and

D. will still not allow Plaintiff Townsend to follow the standard of the Florida Supreme Court per §617 F.S. as before an act of “clergy” is done or alleged protected or “shielded” as a First Amendment Act the act or actions in question must follow these tests of the “THRESHOLD INQUIRY” as stated in MALICKI v. DOE 814 So2d 347 (Fla. SCt. 2002) in acting under Constitutional Law 84.5(7.1) protections and as this Plaintiff argued and presented to the Court of Judge Crenshaw in Plaintiff’s October 9, 2003,

SUPPORTING MEMORANDUM OF LAW AND MOTION FOR REHEARING

stated as follows then and below and by the NEW EVIDENCE tried to be presented to the Court of Judge Crenshaw on September 7, 2006, as Plaintiff Townsend had just received the June/July 2006, ORDERED PRODUCED CHURCH/SCHOOL CORPORATION RECORDS OF or about 1998-2001, that show the criminal underlying actions and intentions and malice and motives of all joint tortfeasor’s to willfully and recklessly use the Child Protective Injunctions, and Refusal to produce records and to make false allegations and slander the character of Plaintiff Townsend to continue the

concealment of all violations of law and even the collusion of the Judges and Attorneys as stated herein. The many **MEMORANDUM OF LAW AND MOTIONS FOR REHEARINGS**, presented in all the Courts (Domestic Violence, Family, Civil, Appeals) in each case and MULTIPLE **MOTIONS OBJECTING TO SUMMARY JUDGEMENT** was still before the court of Judge Crenshaw as again raised by Plaintiff Townsend on September 7, 2006, and Judge Crenshaw instead of an order on the Points per this Memorandum of Law and in concert with the specific words of January 21, 2003, and agreement by Attorney Denny to Judge Arnold that Plaintiff Townsend could Amend the Pleading and re-file the cases and then do a request for consolidation of all the cases Judge Crenshaw continues the stalling, delay, damages and conspiracy and did recuse herself as to this Plaintiff Townsend an admission of guilt and negligence and fraud of her helping the “Clergy” and attorneys and judges and the now former wife and others to still violate the rights of this Plaintiff Townsend and his children and in violation of the laws now since 1995, and all acts are still ongoing and still concealed as stated:

“ISSUE #1—The issue presented in this case is whether the First Amendment bars a third-party tort action against a religious institution grounded on the alleged tortuous act by one of its clergy. We conclude that the First Amendment does not provide a shield behind which a church may avoid liability for harm caused by...battery by one of its clergy ...”

Plaintiff alleged under the Law these acts shown done by “Clergy”, the Estranged Wife, the Sheriff Deputies alleged as “Trustee’s” and Attorneys and Judges and Dr. Lon Lynn and failure by law enforcement or state officials to intervene meets the definition of “Battery” on these Plaintiffs and resulted in “fear” and “intimidation” and “emotional distress” and “loss of civil rights of speech, religious practice, family rights practice and employment as employment’s were terminated as extortion to further violations of laws

and rights and promote the position of to help malfeasance of Scruggs “to not make a church look bad” or the exposure of his malfeasance and exparte incrimination of the courts. Plaintiff incorporate herein in full all points raised in the October 9, 2003, **SUPPORTING MEMORANDUM OF LAW AND MOTION FOR REHEARING** as presented to Judge Crenshaw in case 02-03812 and is never resolved by Judge Crenshaw.

This shows that Plaintiff Townsend and other Plaintiffs rights have been violated as even understood by Plaintiff Minor J.G.T at age 14 on October 20, 1999, when Schism put the children under duress, J.G.T and J.D.T had to move from the family home due to the EXTORTION and THREATS of the SCHISM and the mother and J.G.T wrote:

“Dad,
Please don’t be mad at us! I don’t know what other option I/we have. It’s not fair just not 2 C mome either! N- ways we’ll C U soon + we’ll give U a call later! OK? Take Care of Peaches, Whisper (family cats) + Shaddow (family dog). Jason needs U 2 set up his bunk-bed in his room, If not we’ll get it later + set up the dinette set in the kitchen too!
♥- U ~ C-U Soon
♥ - Jen”

or again 2001, Beck and the Schism filed Criminal Charges claiming Repeat Violence and Domestic Violence and Stalking just so Beck would not meet Randall Townsend at a WORD OF LIFE YOUTH RALLY where now J.D.T was attending College and had begun a new life and starting to regain his son/father relationship as stated by J.D.T but the Schism needed more time to continue and conceal fraud and misappropriation of corporate assets and the intentional concealment and violation of DUTY by Grant, Gibbs, and Scruggs and others that allowed Beck, the mother and the Schism to continue and do crime and multiple violations of rights of Plaintiffs and of the By-Laws and allowed Intentionally, willfully, recklessly and knowingly by judges and harming Plaintiffs to:
(A) Practice freely all civil rights with his family or others or due to the intentions of

alleged Pastors to lie and give false testimony even under Oath, this father has not been able to hug his children now since, 1999, for fear of going to jail on false charges by alleged Clergy, Law Enforcement and Judges working to conceal their own frauds

(B) to speak to or see his own or the Plaintiff children since November 8, 2002, or before or

(C) reverse fraudulent Court actions and INJUNCTIONS for fear of going to jail on “false charges” renewed by pastors and trustees on September 8, 1999, and continued by these **Defendant still today some over 8 years of or with NO PROOF OF THESE CLAIMS** having any truth that Plaintiff Townsend was “dangerous” and “a liar” and “abusive” and “suffering from a stress related breakdown” so to cause fear and frauds to all Plaintiffs even by threats to the Townsend kids so to cause the Plaintiffs Minor J.D.T and J.G.T to on October 20, 1999, to leave the family home and safety of the protection of this father and by frauds of the mother and the Schism kept for over 5 days Townsend from knowing the whereabouts of his Children and then in June 2002, until January 2004 not legally reporting the new residence or phone number of the mother and children and by still using the falsely alleged Ruling of Judge Palomino to law enforcement and Judges and others and then by using Judge Timmerman’s signed Divorce Injunctions of 2003, being gained by fraud and being still used illegally by the Defendant as Former Wife (Karen) and her Co-Conspirators to even still prevent this Pro Se Plaintiff in December 2005 through current times with help and assistance of Judges Holder, Stoddard , Arnold, 2DCA, Crenshaw and Judge Sierra not to allow this Plaintiff Pro Se Father to talk to or even depose his own children to unravel the injustices still being done to all these plaintiffs

herein when Plaintiff Townsend on September 8, 1999, as a FBCCP and CPCS Member, Parent, Children's Awana Commander, (AWANA), Church Council Member, Long Range Planning Committee Chairman, (LRPC), Nominations Committee member and Phase I Committee Member and Budget Committee participant and the direct ancestor as nephew of the founding pastor as the uncle of Plaintiff Randall Townsend and Plaintiff Townsend as a State of Florida Licensed Class "D" Security Officer in 1999, and a "CIVIC LEADER" and as a respected Business Planner of multiple Construction Projects out of "DUTY" demanded then And still of the Courts now of Beck, Meister, Leatherman, Brown and Giles:

(1) "show me the money" and (2) "IF YOU TAKE THESE KEYS YOU ARE TELLING ME YOU DO NOT WANT THE TRUTH" and (3) stated of BECK **"PRIDE HATH CLOSED HIS EARS"**, thinking and being told by the non actions of attorneys, Judges, Law Enforcement and others, as Plaintiff Townsend for years had said to members (Sheriff Deputy Howlett and Jeffers) and (GEOFF SMITH,) and others at before and later times to demand full obedience to the FBCCP BY-LAWS and State and Federal Laws and to reveal:

(A). over \$150,000.00 in building funds not reported by the law(s) from 11/98 through current record but alleged on the revealed June-July 2006 records to be over \$213,000.00

(B). the "secret accounts" or "old closed school accounts" or misuse of FBCCP revenue

(C). the secret credit card uses and personal expenses shown to this Plaintiff (after

Demanded in the Complaint filed April 2002 and over 20 additional Motions to the Courts) for the first time in the June-July 2006 records partly produced still in violation to the Florida Statue §617 and BY-LAWS stated membership rights

show to include fraud, conspiracy, breach of duty, breach of trust, omissions of truthful disclosure and misappropriation or appropriation of a corporate opportunity, embezzlement and wasteful philanthropy of needed Corporate assets, accounts and years of all records are still missing as this Member has the right to full production of records in order to protect the BY-LAWS Contract rights and Statue Rights sought herein yet Judge Crenshaw on September 7, 2006, refused to grant this member his BY-LAWS rights and to ORDER production of all CHURCH and SCHOOL RECORDS done properly as Judge Crenshaw ruled on May 10, 2006) and attorney Denny, Rolfes, and Grant as Registered Agent refuse production of FBCCP Corporation documents and other discovery as required by Law and the FBCCP Corporation BY-LAWS.

- (D). the accountability of all collected funds as “offerings and tuition” and expenses
- (E). the missing \$43,400.00 in the “ASSET Salary fund” reported as \$53,498.83 in December 1998 verses \$10,098.02, in January 1999,
- (F) that Beck, Meister, Leatherman, Jeffers, Howlett and Smith (the Schism) by fraud induced the Corporation General Voting members to divest of themselves their personal assets and the assets received from the Eminent Domain Settlement from the sell of road frontage property at the 7705 Gunn Highway site and by fraud induced these General Voting Members to purchase (for \$600,000.00) the 18105 Gunn Highway property as Beck, Meister and Leatherman knew even by their own printed words in local newspapers, meetings with this Plaintiff Townsend as the LONG RANGE PLANNING COMMITTEE CHAIRMAN (LRPC) and Community leader that the “VISION” Projects presented by Beck and Meister were fraud and a scheme

to conceal theft of daily assets and other frauds and illegal activities as shown herein
coercing fraud to attorneys and courts and trustees as sheriff deputies with other law
enforcement by fraud

(G) that Beck with the PERSONNEL COMMITTEE(S) did direct for Beck's personal
benefit salary increases, bonuses, entertainment compensations, housing and car
allowances and other tax related benefits at the expense and misappropriation of
FBCCP Corporate Opportunity and at the expense of other FBCCP employees and
associates as members.

(H) That Meister with the PERSONNEL COMMITTEE(S) did direct for Meister's
personal benefit salary increases, bonuses, entertainment compensations, housing and
car allowances and other tax related benefits at the expense and misappropriation of
FBCCP Corporate Opportunity and at the expense of other FBCCP employees and
associates as members.

(I) that Beck directed for his personal benefit the attempt at spending \$25,000.-
\$40,000.00 to restore, remodel and enlarge the Earl Home at the 18105 North Gunn
Highway property

(J) that Beck directed for his personal use the "felony theft" of the Awana Microphone
bought by Plaintiff Townsend with designated Awana funds of Townsend and others.

(K) The negligent care and control of FBCCP property and School/Church equipment
(i.e. Buses) while money was diverted to Beck and Meister's entertainment accounts

(L) Nepotism in hiring and illegal labor law practices against teachers and minors

(M) To stop the fraudulent alleged "pastorial" but illegal "legal" and "marriage"
advice and fraud of and to Plaintiff, Plaintiff's wife and children and Church

members and

(N) to tell the truth about the frauds of the Clergy “BUILDING AND GROWTH PLAN”

and how this Clergy “Vision” violated their promises in 1996, of the Clergy to the

LRPC and to the Church as to the process, the project and the objectives being done.

Further, as proof, Plaintiff Townsend states “Clergy” as Beck, Nasworthy, and Meister

consulted amongst and by themselves, prepared and required Long Range Planning

Committee Chairman, this Plaintiff Townsend to present and or be presented as a

participant in fraud to the General Voting Members and

A. Even gave Plaintiff Townsend on January 12, 1996, via a fax a cover letter stating:

“On the pages to follow is the information that needs to be reported to the church on Sunday night in the Business Meeting. The Pastor and I have reviewed this information and discussed it at length and believe that what you need to do is read this report as is written. You need to communicate the report verbatim, do not vary from this report as it is written. Read the report and then we can deal with any questions which should come from the floor of the meeting.

Please call me as soon as you have read the report.

In Christ,

Elbert Nasworthy”

The letter to read to the General Voting Members and the LRPC

Committee Members as report known as “**Report of the Long Range Planning**

Committee First Baptist Church of Citrus Park January 14, 1996” in this nine(9)

point report states courses of past, present and future actions for which Townsend shortly

thereafter alleged was illusive, evasive and misrepresentations of what roles persons

would play in the collection, presentation, and implementation of the COGAN Plan.

B. BECK and the Schism as “moderator” and alleged honorable “clergy” in multiple

public General Voting Meetings and Committee Meetings presented that Plaintiff

Townsend was responsible for compiling and presenting “data” and “findings” per the

outline of the COGAN Plan and Contract but then privately impeded and obstructed the reports, collection of data and FBCCP Contract/BY-LAW duties of Townsend in his multiple positions of leadership

On or about and at various times, Townsend began consultations per his duty and did:

A. On February 25, 1996, Per the agenda CONDUCT A MEETING AS CHAIRMAN:

“To the Long Range Planning Committee (LRPC) OF FIRST BAPTIST CITRUS PARK,

Members present: Bill Dubas, Clara Claxon, Duane Mildord, Mark Nunes, Randy Townsend,

Members absent: Herman Meister out of town on school business

Pastor(s) attending; Elbert Nasworthy

Randy Townsend acted as chairman and Clara Claxon as secretary of the meeting.

The Chairman then announced that a quorum of members was present and the meeting of FEBRUARY 25, 1996, was duly convened.

Mark Nunes was introduced and welcomed as the new chairman of the building and grounds committee. As chairman of building and grounds the church by-laws appoints said chairman of building and grounds to the long range planning committee.

A report was made by the Chairman at the request of the absent Mr. Meister and per the school steering committee that the long range planning committee (LRPC) not an approve their need for portables for the school year 1996-1997. Discussion was held and the Motion was duly made and seconded. Motion was approved. The Long Range Planning approves the site plan of 2/19/96 by EMK which locate two portables on south curb of driveway between the Teston buildings and the play areas as drawn. The LRPC encourages the location of the sports storage room next to the school on the east side of the north canopy. The LRPC did suggest that the portables be leased as it appears at this time the buildings will not be needed when the next building phase as projected at present time is completed.

The Chairman did distribute new planning notebooks containing:

SECTION 1. CORRESPONDENCE

1. A “DRAFT” letter for the discernment of LRPC members pastors and per approval of LRPC members and pastors, the letter be revised if necessary and then forwarded to attorney’s Mr. Cary Gaylord and Ms. Lorena Ludovici. Discussion of points raised in the letter are to be discussed in the 3/10/96 LRPC meeting.

SECTION 2. COMMITTEE PLANNING GOALS AND OBJECTIVES

2. a. Six year Calendar
- b. “VISION 2000” ten phase PROPOSED sequence of events.
- c. “VISION 2000” LRPC CODE OF DUTIES AND GOALS

- d. Site maps (to be provided by Duane Milford) containing measurements of current specs and projected site planning by EMK.

SECTION 3. "RULES OF THUMB" BUILDING CODES AND GUIDELINES

- a. Ten pages of site planning "rules of thumb" provided by Church Architecture

SECTION 4. LITIGATION OF WORK STUDIES MATERIALS

SECTION 5. "EXPERT" AREAS OF WORK STUDIES

SECTION 6. "AD HOC" AREAS OF WORK STUDIES

The Chairman did motion that the LRPC approve the "EXPERT AREAS OF STUDY" in an effort to improve communications and reduce time elements these studies will require. Motion was seconded and Motion was approved.

The chairman did report that a proposal from CHURCH ARCHITECTURE, the planning group for the Southern Baptist Convention was received and will be review in detail at the 3/10/96 meeting.

The Chairman did report that a meeting was held on February 21, 1996, with Mr. Russell Hughes, from the Church planning department of the Florida Baptist Convention, Mr. And Mrs. Brewer our legal appraisers, Elbert Nasworthy and Randy Townsend. The report notes that Mr. Hughes also noted that he will provide information on the legal matters of the Southside Baptist Church in Jacksonville, Florida, as that information may be of help in our litigation. Mr. Hughes also noted that this church should contact with a local architect and building contractor to guide us through expansion discussions. Mr. Hughes offered to provide additional information regarding our issues after he has the opportunity to review church records and data.

At this time Elbert Nasworthy for scheduling reasons requested that he be excused and that the committee continue for as long as needed. Chairman agreed to bring all pastors up to date when Pastor Beck returned from a missions trip.

Discussion was held on the "RULES OF THUMB" and "EXPERTS" were encouraged to meet as needed with each other and church members and collect all data.

ALL COMMITTEE MEMBERS WERE ENCOURAGED TO REMIND OURSELVES AND ALL CHURCH MEMBERS OF LUKE 14:28-30 (Plan your work before you begin the foundation) AND THAT THIS DATA COLLECTION PHASE MAY LAST SEVERAL MONTHS AND SHOULD IN NO WAY INFLUENCE OUR CHURCH FAMILY THAT THE COMMITTEE IS PURSUING ANY DIRECTION AT THIS TIME. ONLY THE DATA SUMMARY REPORT PRESENTED TO THE CHURCH FOR APPROVAL WILL DETERMINE THE COURSE OF ACTION THAT THIS COMMITTEE WILL PURSUE AFTER A CHURCH VOTE APPROVING SAID RECOMMENDATIONS.

The committee agreed that on 3/10/96 we would address the following:

*Review of "EXPERT AREAS" rules of thumb.

Chairman requested that each "EXPERT" present a brief review (5-10 minutes) of findings to date. A written summary is suggested from each expert with eight copies for committee and pastors review.

*Review of "WHAT IF'S AND "WISH LISTS"

*Review of all church growth and planning bids and committee use of same.

*Review of PROPOSED DRAFT LETTER from Randy Townsend to attorneys.

The committee agreed that on 3/31/96 we would address the following:

*Complete reviews of "EXPERT AREAS"

*Prepare statement to be reviewed by the church at the next available business meeting.

A motion was made and seconded that this meeting adjourn. All approved."

- B. The May 20, 1996, MEETING OF THE LRPC upon looking at "immediate" "needs" at the 7705 Gunn Highway property and the position of Pastors and Finance

Committee members that funds were limited the Committee began considering expansion at the 7705 Gunn Highway property from a multitude of Expert Data and Cost Details to cure immediate issues with limited resources.(Minutes available)

- C. Met with and received counsel and exchanged letters from Attorney David Gibbs, III, in and during October 1996, and as the letter of October 15, 1996, shows on "Business Loss Rule" and other matters dealing with David Gibbs III and Drew Gardner as agent of and with David Gibbs, III and the Christian Law Association (CLA) and the Gibbs Law Firm as follows. (Letters Available)

- D. Many times Met with and received counsel and letters from Attorneys Cary Gaylord and Lorena Ludovici.(Letters Available)

- E. Met with and received counsel with Hillsborough County officials and exchanged letters.(Letters and reports available)

- F. Met with and received counsel from Attorney as Registered Agent for the FBCCP, John A. Grant. Jr. who did give fraudulent legal advice to Plaintiff Townsend.

- G. Met with and received counsel with IDLEWILD BAPTIST CHURCH PASTORS, RENO ZUNZ and CARSON WRIGHT.(Letters Available)

- H. Met with and received counsel with several Marriage Counselors (Names Available)

- I. Met with and received counsel with Dr. Lazarra, Dr. Lon Lynn, Dr. Hoyos.

- J. Consulted by phone with multiple persons as agents for the Attorney Generals office,

the State Attorney's office, The Hillsborough County Sheriffs Department, The Department of Education and various other State Of Florida Agencies and Departments.

- K. July, 2000, Townsend, Consulted with Attorney/former Judge Charles Scruggs, exposing all issues for his legal direction and counsel.
- L. Met with and received consultation and exchanged papers and letters with Attorney Jeffery Klink, whose office is still located in the same buildings of Attorney Scruggs. Attorney Klink, advised to hire him at that time was premature and that the legal obligations of the matters Attorney Scruggs was handling may or could be wasteful of resources for both attorneys to be hired at the same time so therefore the matters rested in full with Attorney Scruggs.
- M. On Multiple occasions wrote to and met with Hillsborough County Sheriff Deputies and on April 3, 2002, filed a Incident Report Case No: 02-031385 showing and proving "Contempt of Court" by Ronald Beck to Judge Palomino and reported this filing of said report and obtained services and paid fees to Attorney Scruggs to address this matter with Judge Palomino not knowing at the time that Attorney Scruggs and Judge Palomino were acting to conceal frauds and omissions of truthful disclosure and violation of Law as now shown continuing herein this Complaint.
- N. On April 25, 2002, Plaintiff Townsend filed a "CIVIL ACTION FOR DAMAGES COMPLAINT AND DEMAND FOR JURY TRIAL, And FOR production of Corporate Records and they are still not provided to this "MEMBER" now /Plaintiff Townsend per his Offices and Duty sought and still seeks to fully expose fraud and criminal acts of:
(1) hidden and misuse of FBCCP & CPCS MONEY and the Awana Children's property

- (2) the BECK “Fraudulent Building & Growth Scheme” being used as the “VISION” “I & II” by Beck and others now through 2006 as proved fraud by the 2006 **Rulings** of Judge Barton and Judge Arnold and other professionals of Hillsborough County and
- (3) tort and intentionally “illegal marital and employer counseling” by clergy, as Beck, Meister, Leatherman and by judges and attorneys and others to conceal fraud
- (4) tort counseling and violations of law by “masked” Officers Howlett and Jeffers acting as alleged “ethical” Sheriff Deputies and ethical Corporation Officers/Trustees
- (5) reveal all other violation and torts of the Laws and By-Laws and torts against these plaintiffs and

still attempting to reveal and expose each Defendant attempting to conceal crimes of the pastors, trustees, judges, attorneys, deputies and all other defendants and of and with the “alleged clergy and sheriff deputies” and lawyers and the now former with and other FBCCP Corporation employees and members since 1995, to conceal their own tort actions and others multiple violations of the laws and omission of truthful disclosure procedures to conceal the malpractice and frauds of a fellow attorney’s (Gardner, Gibbs, III and Grant Jr.) who provided false and fraudulent legal advice and former Circuit Court Judge (Scruggs) who in and through July 2000 and November 2001, through January/October 2003 and February 2006 and May 2006 and continued by Gray, Denny, Turmel, Gomez, Sierra and Crenshaw:

- A. Did intentional fraud to the Plaintiffs as Scruggs now former clients “stating Plaintiff Townsend did not have a court case against the pastors” due to “separation of church and state” and “freedom of speech for clergy” for fraud or misrepresentations and
- B. said Plaintiff could not use the courts to stop the slander by the pastors, trustees, or

the other church or school employees even of and by the estranged wife to fraud Plaintiff Townsend's reputation and lost child custody relationship or to get the FBCCP Corporation Documents, because the statements by "religious people" were allegedly protected by "free speech" and "separation of church and state" even demanded by a faxed letter to Scruggs on 11/12/01 as a Respondent in the Domestic Violence Court cases of 01-15813 and 01-15814 nor in the Divorce Case 02-4974 or as a defense to the frauds to prove case 02-03812 which now June/July 2006 produced records confirm the Breach of Contracts (BY-LAWS and Marital and LAWYER/CLIENT) and Violations of Laws as alleged by Plaintiff Townsend to Church/School members, Attorney Scruggs Judges and others and Law Enforcement.

- C. Scruggs said Plaintiff in July 2000, could do nothing but write letters to Doctors (8/1/00, Certified Mail letter to Dr. Lon Lynn, Ron Beck and Gary Leatherman) and Corporation members and others requesting they protect his children and the other children and in the Court of Judge Palomino, Ron Beck alleged these letters were "false", yet Scruggs with full knowledge of these issues did fraud the Court and Plaintiffs.
- D. continues statements of frauds to this former client and to the courts and officers
- E. did deliberate omission and fraud to keep secret Scruggs "personal convictions" withheld and intentionally not revealed to Plaintiffs until September 30, 2003, stating "my personal convictions do not allow me to make a church look bad" and the February 16, 2007 letter stated here and the testimony by Scruggs to Judge Stoddard And now the February 16, 2007, letter as stated herein thereby allows the criminal acts to continue giving unlawful "benefit to clergy" and became as a joint tortfeasor

with the “pastors”, “alleged trustees”, attorneys Drew Gardner, David Gibbs III, John Grant Jr. and Judges and Law enforcement and others and the former wife’s acts of:

- F. child abuse as physical, emotional, mental and continuing permanent,
- G. child neglect,
- H. child endangerment,
- I. fraud, theft and misuse of church and school funds for “pecuniary gain”,
- J. concealment of church and school designated funds in violation of the FBCCP BY-LAWS to report all monies every 90 days and State and Federal laws of reporting
- K. fraudulent misrepresentations regarding the “building funds and expansion program” called by clergy (Beck, Meister) herein as “VISION I” and “VISION II”
- L. false reporting to and by law enforcement and negligent reporting to law enforcement
- M. false reporting to courts in affidavits, oral and written testimony and other actions
- N. obstruction of justice and obstruction of a criminal investigation
- O. fraud and false reporting to the “general voting members” of FBCCP since 1995,
- P. multiple other breach of duties required per Florida Statues 617 and Florida Statue 895 and Florida Statue 772
- Q. of unlawful abuse and harassment and conspiracy and neglect of duty by Sheriff Deputies as alleged Trustees for the corporation never lawfully elected to office
- R. to extrinsic fraud and fraud on the courts and frauds to superior deputy officers and Internal Revenue Tax Fraud,

in ongoing violations of laws and contracts and concealment of multiple and ongoing illegal acts now from 1995 through current times of persons alleged as “pastors” as Beck, Meister and Brown and “alleged trustees” Howlett, Leatherman, Jeffers and Smith and

other FBCCP and CPCS Corporation officers and members and employees to continue and to conceal their frauds and omissions of truthful disclosure and criminal acts in violation of the Laws and of the FBCCP BY-LAWS and of their duties civil and legal.

As an extortion to conceal to their exposure of fraud and Criminal acts Scruggs, the wife (Karen Harrod Townsend) and “Clergy” (Beck, Howlett) did in 2001, fraud and omissions of truthful disclosure to Judge Palomino and then also continued the omissions of truthful disclosure and frauds in the Divorce Court of Judge Timmerman in 2003, and Timmerman and Scruggs and Turmel did Exparte, after Scruggs was terminated (9/03) as attorney for Plaintiffs and by the accusations and unlawful concealment and omissions of truthful disclosure of Attorney’s Gray and Denny and Turmel then with Judge Gomez created allegations that Plaintiff Townsend did “molest” and “abuse” his own children in order to still deflect eyes from the illegal actions of pastors and deputies and others and judges and the attorneys as even employed for as by this Plaintiff directly and indirectly and then in collusion these attorneys and judges and pastors did impede and dissolve the marriage contract by Plaintiff Townsend and the now former wife as Defendant Karen Harrod Townsend as she was a contracted FBCCP/CPCS school employee as a teacher contracted to obey the directives of the pastors or be “fired” and the “children be kicked out of the school”. Upon the favorable ruling by Judge Palomino on November 15, 2001, ruling for this Plaintiff Townsend as a Respondent to the Charges of Beck and the persons for whom he spoke as present at the Court as Joe Howlett and Herman Meister and others as herein named as “Doe” and for charges made by the wife who then chose to intentionally, knowingly and recklessly start fraud of the Judge Palomino November 15, 2001, RULINGS and by the Statements of Attorney Charles Denny in now known

violation of his fiduciary duty to these Plaintiffs since the 2006, finally produced FBCCP Corporation Records showed this Plaintiff Townsend is still and always has remained since 1993, a legal member of the FBCCP Corporation and the statements of Plaintiff Townsend were and are within his legal rights per Florida Statutes 617, to demand from the alleged Corporation officers and to quote Attorney Denny on June 24, 2003, in the Courtroom of Judge Crenshaw stated “Some of the allegations are quite frankly a little bizarre, and it’s the kind of thing that they would like to have resolved.” Attorney Denny alleged the Courts had no jurisdiction to assist Plaintiff Townsend in his allegations of Civil and Criminal and Contractual Charges Violations due to the “entanglement doctrine.” Denny further stated, “He’s (Townsend) is asking the Court to step into a religious dispute and basically find that—that the church is not organized properly and managing itself properly and not dealing properly with Mr. Townsend.” As stated on June 24, 2003, on page 5 of the transcript of said hearing. Attorney Denny then in continuing of the “not dealing properly with Mr. Townsend” ignores F.S. 617 and the BY-LAWS of the FBCCP and in the FIRST AFFIRMATIVE DEFENSE STATED:

FIRST DEFENSE The temporary injunction proceeding against Plaintiff was initiated with probable cause and was fully justified, as Plaintiff was harassing and stalking members of the First Baptist Church of Citrus Park. The judge in the temporary injunction proceeding made no findings whatsoever that the proceeding was initiated without probable cause. When the judge informed Defendant that Defendant would have to re-file the injunction proceeding in criminal court, Defendant decided not to subject Plaintiff to criminal prosecution.”

Further, Attorney Denny promoted the frauds of the alleged Clergy and alleged Trustees masked as also Sheriff Deputies to fraud the court that in the November 3, 2003, REQUEST FOR ADMISSIONS, Defendant Denny stated that (A) “...2. ...that Plaintiff

posed a threat of unstable conduct and violence toward members of First Baptist Church of Citrus Park.” And “(4) That the temporary injunction proceeding described in the Complaint was not instituted and prosecuted with malice, but was rather a good faith attempt by Defendant to prevent Plaintiff from posing a further threat of unstable conduct and violence toward members of First Baptist Church of Citrus Park.”

This position of Attorney Denny is not supported by the Ruling of Judge Palomino on November 15, 2001, per the transcripts presented to the case files of case 02-03812 and Divorce case 02-4974 and fully presented to Judge Crenshaw as Defendant Beck said to Judge Palomino words as said in the Complaints as point 107, below herein.

Townsend responded to the Court of Judge Crenshaw on June 24, 2003, as follows not aware that the Court of Judge Crenshaw was being deceived about the proper legal cases presented by Attorney Denny from the District Courts (as had been overturned by the rulings of the Florida State Supreme Court and formed clear and direct flow from the Federal Case Laws where as the District Courts had ignored Federal Case law and alleged to give total immunity for any act alleged to be done by "Clergy." Also **Kond v. Mudryk**, 769 So2d 1073 (Fla. 4th DCA 2000) but still made sure that he BY-LAWS were used in the process of the Church and in compliance to the Florida Statues 617 process. The October 9, 2003, argument to the Court in the MOTION FOR REHEARING stated, on page 6,:

“Stealing money and destroying father’s civil rights are TORTS in both Federal and State laws and totally independent of whether these acts are religious or not.” **PLAINTIFF WOULD ASK THIS COURT TO TAKE JUDICIAL NOTICE OF TOWNSEND v. TOWNSEND**, Case #02-4974, currently before Judge Timmerman, and with the pleadings and the contents of the recorded testimony of the wife in the trial note that the extreme “outrageous” actions resulted due to the conduct of the counselors upon the family with the

intent and malice to harm the family as a distraction to their criminal behaviors about to be exposed to the shareholders in the fall of 1999.

6. ISSUE #3---The United (States) Supreme Court has explained that the FREE EXERCISE CLAUSE---...”embraces two concepts-freedom to believe and freedom to act. The first is absolute **but, in the nature of things, the second cannot be. Conduct remains subject to regulation for the protection of society.**” **“Thus, The First Amendment has never been interpreted to mean that “when otherwise prohibitable conduct is accompanied by religious convictions, not only the convictions but the conduct itself must be free from government regulation.” Government regulations include both statutory law and court action through civil lawsuits.”**

The “Threshold rule” must be argued and proved by the defendants to any court but all judges have ignored Plaintiff’s motions and a hearing has been attempted but each court has denied Plaintiffs legal due process since 2001.

Townsend stated on June 24, 2003, pages 6-7, as follows:

“...I believe I’ve timely—I’ve been asking for motions for extension. I also believe it was going to be a conflict of interest for Judge Arnold to hear that matter. My attorney handling my divorce action, Mr. Charles Scruggs is handling that . And we went before Judge Timmerman a week after that, and we’re still waiting on the final judgment on that divorce matter. Accusations were made by my wife. I was a former—probably the fourth or fifth level highest at that church. And I’ve been a member since—off and on since the early ‘60’s, and this new pastor—there are multiple violations against the church that my uncle had formally started back in the ‘40’s and ‘50’s. And ethically I could not sit back and continue for them to ask me to help them lie to the congregation, as me to drive a school bus or a school bus with kids on it that they knew was faulty, that was not tagged, not insured, and so I spoke out. I became the spokesperson to the wrongdoing. That’s cost me my family. That’s cost me—I can’t walk down the mall without having the pastor’s daughter still point fingers on me. I’m trying to protect my family, let everybody know what is the truth and do what is honorable. I’ve been filing motions for extension. I’m waiting for Judge Timmerman’s final judgment, and then I will approach a lawyer to take this case. I have spoken to over a dozen trying to comply with Judge Arnold’s ruling. I believe I’m just around the corner to get that done.”

The issues as recorded Transcript of the January 21, 2003, hearing before Judge Arnold, case 02-03812, and medical reports (Dr. Hoyos and Dr. Millan) was immediately given to Scruggs to assist in the presentation of all facts to Judge Timmerman on January 30,

2003, and to give a reinforced position to Attorney Scruggs that the claims of Plaintiff Townsend per the partial ruling of Judge Arnold on January 21, 2003, had merit and by Judge Arnold's inference that the allegations after being presented in a better form may then be properly alleged and thus prompt former Judge/Attorney Scruggs to take the case for all Plaintiffs as Scruggs "withholding" his "personal Convictions" in violation of the Law was alleging the Case as against all Defendants was "protected" as stated herein based on his superior experience as a former Judge objecting to the legal position of Judge Arnold.

The enforcement of the Divorce Judgement by Attorneys was gained and used by frauds and still does threats of jail and as other abuse to Townsend and do interference of child custody and the Orders and Rulings from Judges Crenshaw on September 7, 2006, and Judge Holder, Arnold and Stoddard in 2006, and Judge Sierra in 2004-2005, and Judge Timmerman in 2003-current, continue the interference with this fathers rights to his children's interactions and relations and continues this fathers abuse of rights gained by the frauds on the courts and the refusal of Judges even Judge Crenshaw on September 7, 2006, of this father as a member of FBCCP to have per "**Florida Statues 617. 1602, INSPECTION OF RECORDS BY MEMBERS**" rights so this Plaintiff can expose past frauds, ongoing frauds and even present the necessary proofs of the pending Malicious Prosecution Count in Lawsuit 02-03812, **TOWNSEND V. BECK** or to supplement the Complaint after full disclosure of the FBCCP records even by these attorneys being paid by the Plaintiffs who still act to conceal facts and evidence from opposing counsel as this Plaintiff, PRO SE. Judge Crenshaw and attorney Denny even up to and including new actions and statements in the hearing of September 7, 2006, in collusion have knowingly,

intentionally, recklessly and negligently violated “Discovery Rules” with alleged superior knowledge of the law obstructing this member as the Pro Se Plaintiff with rights to all records and right to seek injunctions preventing these corporate officers from continuing criminal acts against these plaintiffs as they(Denny as Plaintiffs attorney and Judge Crenshaw as allegedly unbiased) refused to ORDER to turn over records or Grant Plaintiff Motions, still act to conceal criminal acts of themselves and of “alleged” clergy, attorneys, judges, deputies and all defendants as stated herein and to prevent Plaintiff Townsend from presenting this case in full to a jury per Plaintiffs rights to have a “day in court” and without production of the full documents one allows “Benefit to Clergy” and thereby tolls all statute of limitations by the concealment of all things as demanded per Florida Statutes 617 per the FBCCP BY-LAWS, since 1995 to present by this member. And per **Nagashima v. Busck** 541 So2d 783 (Fla. 4th DCA 1989), “a factual misrepresentation combined with a misrepresentation of law may also be the basis of a tort action for fraud.” Per **Harrell v. Branson** 344 So2d 604 (Fla. 1st DCA 1977),

“A false representation may be actionable even if the defendant made no direct statement to the plaintiff. Instead, it is sufficient that the defendant made the representation with the intent that it reach the plaintiff for the purpose of inducing the plaintiff to act in reliance on it.”

Attorneys, Judges and Sheriff Deputies and others have made physical threats and other threats against Plaintiff Townsend who has at yet to knowingly violate any law.

Blocking “full discovery” places the clergy, deputies, attorneys and judges in a position of advantage to conceal additional violations to plaintiffs and thereby also allow prejudiced triers of fact or law to allege that all elements of Plaintiffs case are not fully pled and additional statements by Judges show prejudice to misuse their alleged positions

to make false claims and rulings as “Res Judicata” or “Contempt” or as Judge Stoddard falsely created a defense for his friend Scruggs that “plaintiff never hired Scruggs...”. Judge Crenshaw with attorney Denny were fully advised during July –September 2006, in written letters, Motions and by verbal arguments that the just partially released Judge Crenshaw Court **ORDERED** on May 10, 2006, FBCCP Corporation Documents and Ron Beck Credit Card Statements revealed fraud, and criminal acts still ongoing and that further production to comply with the May 10, 2006 ORDER was needed and that further production was needed for this PRO SE and DIRECT MEMBER to prove his Cases yet in Collusion Judge Crenshaw and Attorney Denny argued and still concealed production of documents and ignored Plaintiffs Matters of Law and Discovery Rules and actions required of members and officers of the FBCCP BY-LAWS to fellow members. Further in 2006, Judges Stoddard, Arnold, Holder, and the Second District Court of Appeals did ignore, conceal, prevent and continue illegal positions to Plaintiffs as Judges Crenshaw and Judge Sierra with others had done in 2005 and before as stated herein. Plaintiffs at times material hereto, are also as Church and School members, were and are dutifully serving their positions to the Church per a Contract known as the BY-LAWS, CONSTITUTION, POLICIES of 1993, of the FIRST BAPTIST CHURCH OF CITRUS PARK, (FBCCP) and CITRUS PARK CHRISTIAN SCHOOL (CPCS) AS A MINISTRY OF THE FIRST BAPTIST CHURCH OF CITRUS PARK and per the CPCS Student ENROLMENT CONTRACTS of 1989 –2002, and the laws of this United States and State of Florida until “battered” by all and each individual and each agency, each Department, and each Company as stated herein arising from and for all Defendants participation in and production of 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” to these select Defendants herein as alleging to be “pastors” (hereinafter as SCHISM I, as of Beck and Meister) and or “church officers as trustees” (as Smith, Howlett, Leatherman, Jeffers hereinafter as “SCHISM II” as alleged “FBCCP TRUSTEES” with malice, collusion and enjoined with SCHISM I, in violation of Florida Statutes 775.03, stating, “The doctrine of benefit of clergy shall have no operation in this state” and thereby gave and are still giving “Benefit to Clergy”; as all defendants allege they are lawfully acting and all “pastors and trustees” (SCHISM I and SCHISM II) alleged they are “legally” voted to the positions as elected “Trustees” by the General Members of the First Baptist Church of Citrus Park per the BY-LAWS CONSTITUTION POLICIES (hereinafter as FBCCP “BY-LAWS”) conducting FBCCP Business per their alleged lawful and legal actions authority of and for and to all the “voting members” of the Corporation of the FBCCP and participation and interference with the Constitutional Freedoms and Rights of Plaintiffs, and tort interference against Plaintiff’s assisting themselves and other Defendants with unlawful “pecuniary gain” by theft and fraud and injurious falsehoods against the reputation of this Plaintiff in the public eye in his Duty of Service to the Corporations (per Plaintiff Townsends proper “duty and service” per the BY-LAWS as nominated and elected per the Confirmation of the Nominations Committee Process and by then vote of the General Voting Member) yet “Schisms I & II” members allegedly removed Plaintiff Townsend from all positions of service on September 8, 1999, by the unlawful process of the collusion and fraud of Beck, Meister, Leatherman, Howlett, Giles, Jeffers and Smith and others as removed without following the process per the BY-LAWS Article III, Section

7, (A) – (G) and to and by the laws of this State of Florida and the United States of America and Schism I & II Defendants interference with Plaintiff's various Contracts (Church BY-LAWS Contract, Marriage, Attorney/client contracts, employment and any future business contracts) and Unlawful interference and slander of Plaintiff Townsend good reputation in the public eye and Plaintiff's various Child Custody Rights/Duties causing Child Neglect, Child Endangerment, 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 family, Children and others by actions in violations of Florida Statues 775.03, giving unlawful "Benefit to Clergy" as it will be proved the alleged "Clergy" and FBCCP Corporation alleged officers and the now former wife was acting and continue to act in violation of various Laws as stated herein per their duty of or as agents or as citizens and specifically 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 against Section 1983 of TITLE 42 of the United States Code 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 FBCCP and CPCS 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. Further, in an extension of and a result of omissions of truthful disclosure defendants did fraud and omissions of truthful disclosure and injurious falsehoods to cause Plaintiff Townsend to lose his employment at Kmart and suffer loss of future rights and future employment and additional Constitutional Rights as stated herein. Each Defendant herein did continue the "nuisance" of violations of Plaintiffs rights and failed

to reduce the “risk” of losses of values and rights due to Plaintiffs and all the children under the duty and care of Plaintiff by defendants tort violations of laws and contracts.

2. Defendants still knowingly and recklessly participate in the supply, production, and resulting damages in the advancement of the injurious falsehoods of the alleged “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 Code and Law and which Plaintiff as a “Whistle Blower” made claims against the alleged “clergy” and the defendants do 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 FBCCP Corporation Not For Profit and FBCCP General voting members and these Plaintiff’s being abused, kept ignorant and deprived of truthful lawful information at their times of required Church membership votes per the Corporation BY-LAWS and thereby become Joint Tortfeasors.

3. Defendants each as individuals and as agents, Departments and Corporations did/do fraud and omission of truthful disclosure and or denied they had “jurisdiction” per the Florida Statues to a “DUTY” to pursue, investigate or prosecute the allegations of all violations involving a Florida Statues 617 **NOT FOR PROFIT CORPORATION** or allegations of violations of Officers or Clergy of NOT FOR PROFIT CORPORATIONS or DUTY to enforce Section 1983 of TITLE 42 of the United States Code. 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, intentionally, knowingly, recklessly and negligently allowing additional

violations of Federal and State and County Laws and Labor Laws and Contracts. Each and all defendants have intentionally avoided exposure of all criminal actions of the clergy and others and thereby conceal their own frauds and crimes and breach of duty and thus continue the “assault” on the “Rights” of these Plaintiffs now for over 10 years.

JURISDICTION

4. This Court has personal jurisdiction over this litigation under:
 - A. 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]
 - B. Various Sections in Chapters 7, 12,13, 19, 21, 31, 41, 43,47, 65, 73, 79, 93, 96,110, 110A, 123, of TITLE 18 of the UNITED STATES CODE.
 - C. ALL FEDERAL HUMAN RIGHTS ACTS and HATE CRIMES ACTS as per Title VII of the Civil Rights Act of 1964, §§ 704(a) and 706 (f) and 706(g) And 42 U.S.C.A. §2000e-3(a) and §5(f) and 42 U.S.C.A §2000e-5(g) and per Florida Statues 760.10.
 - D. And Plaintiffs also sue each person, agency and State of Florida Government Public Entity and or each Corporation as stated herein, pursuant to Florida Statues 768.28(6) and Florida Statues 760 and Florida Statues 772 and Florida Statues 895 and per Florida Statues 617 and this Court has personal and supplemental jurisdiction as to the other courts and these Complaints and counts 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.
5. This Court also has Jurisdiction of and for the Unlawful and Negligent retention of employees after being advised of Breach of Duty and Fraud by Employee within the

agency, corporation, court 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) and further these law enforcement officers, state officials, judges and others may upon retirement collect United States Federal Income and pensions and payments after knowingly, intentionally, and negligently and fraudulently violating the duty of service gaining these Federal monies and pensions allegedly earned in the performance of their dutiful service while allowing “Fraud”, “Omissions of truthful disclosure”, “battery” and “threat” to ALL Plaintiffs.

6. This Court also has Jurisdiction over each defendant AGENCY AND COURT 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 Constitutional “Religious Right” of this Plaintiff and his children while each defendant knowingly gave “Benefit to Clergy” to expunge unlawfully these Plaintiff’s from their “Religious Rights” to membership at the FBCCP, prior even to and during and after the arrival of Defendant Ron Beck, who knowingly, intentionally, recklessly and negligently violated the Constitutions of: The United States of America; The State of Florida; and The First Baptist Church of Citrus Park, By-Laws

Constitution as BY-LAWS process as required to lawfully do acts of Defendants. This Court also has jurisdiction to enforce the Constitutional Rights of Plaintiff unlawfully damaged by actions of the employer, employees and courts in violation of Florida Statutes 760, and of United States Code: TITLE 18, CRIMES AND CRIMINAL PROCEDURE for matters of Religious Rights, Race Discrimination, Whistle Blower Retaliations and unlawful payment practices and discriminatory harassment in the workplace. And as Judge Marva Crenshaw so ruled on May 10, 2006, and allowed and reinforced “NO LAW SHALL IMPEDE THE OBLIGATION OF A CONTRACT” as stated in the UNITED STATES OF AMERICA CONSTITUTION and the STATE OF FLORIDA CONSTITUTION and plaintiff alleges all laws, policies and rules of procedure used or allegedly used to protect defendants from allegedly not protecting or doing or acting per the Contract duties of the “BY-LAWS” or “Attorney Client Contracts” are UNCONSTITUTIONAL in the act or event they may or shall or will “IMPEDE THE OBLIGATION OF A CONTRACT” as the Contract may protect or involve a religious right of Plaintiffs and these alleged acts and violations are in conflict with:

UNITED STATES CODE: TITLE 18 CRIMES AND CRIMINAL PROCEDURE

SECTIONS: Chapter 7, ASSAULT; Chapter 12, CIVIL DISORDERS; Chapter 13, CIVIL RIGHTS; Chapter 15, Claims and Services In Matters Affecting Government; Chapter 19, Conspiracy; Chapter 21, Contempts; Chapter 29, Elections and Political Activities; Chapter 31, Embezzlements and thefts; Chapter 41, Extortion and Threats; Chapter 43, False Personation; Chapter 47, Fraud and False Statements; Chapter 57, Labor; Chapter 65, Malicious Mischief; Chapter 73, Obstruction of Justice; Chapter 79, Perjury; Chapter 93, Public Officers and Employees; Chapter 95, Racketeering; Chapter

96, Racketeer Influenced and Corrupt Organizations; Chapter 110, Sexual Exploitation and Other Abuse of Children; Chapter 110A, Domestic Violence and Stalking; Chapter 121, Stored Wire and Electronic Communications and Transactional Records Access; Chapter 123, Prohibition On Release And Use of Certain Personal Information From State Motor Vehicle Records and multiple other sections of this United States Codes as Discovery of all violations are still ongoing and Plaintiff Townsend states that by the Collusion, Concealment and Refusal by Circuit Court Judges, Attorneys, and State Officers and Law Enforcement refusal to grant Plaintiff's Pro Se Ongoing Discovery Demands of Productions of all Documents that this Creates and prolongs concealment and damages and obstructions of Justice for this Pro Se Plaintiff to present all facts to the Federal authorities including the Federal Bureau of Investigations (FBI) and IRS.

7. This Court has Jurisdiction over each Agency and Department of the State Of Florida per **KAISNER v. KOLD** 543 So2d 732, 1989 Fla. SCt. 2682, and that the issues of NEGLIGENCE by the AGENCY OR DEPARTMENT is:

“We see no reason why the same analysis should not obtain in a case in which the zone of risk is created by the police.” Further, “There is a strong public policy in this state that, where reasonable men may differ, the question of foreseeability in negligence cases should be resolved by a jury.”

Per **VINING. V. AVIS RENT-A-CAR** 354 So2d 54 (Fla. 1977), 1977 Fla. SCt. 6600.

“Where a defendant’s conduct creates a foreseeable zone of risk, the law generally will recognize a duty placed upon the defendant to either to lessen the risk or see that sufficient precautions are taken to protect others from the harm that the risk poses.”

See **STEVENS v. JEFFERSON** 436 So2d 33, (Fla. 1983), 1983 Fla. SCt. 5164.

8. This Court has Jurisdiction PER **THE TORT CLAIMS ACT** which does not require claims-filing requirements over EACH INDIVIDUAL DEFENDANT 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) AND

9. TO AWARD PUNITIVE DAMAGES UPON THE FINDING OF A JURY TO ADJUDICATE AND FAIRLY COMPENSATE PLAINTIFF(S) FOR ALL MATTERS AS STATED HEREIN.

10. This Court has Jurisdiction per **PROSSER, LAW OF TORTS §46 (West 4th ed 1971)**

“All persons who actively participate in a tortious act, or who aid or encourage the wrongdoer in furtherance of a common plan or design to commit the tortious act, are equally liable with the wrongdoer for the act. Those who ratify and adopt the wrongdoer’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 Also any court officer or judge after hearing a matter and once ruling on any matter over and above the ruling of “no jurisdiction” becomes a joint tortfeasor for any and all wrongdoer or the act of any wrongdoer.

11. Other courts retained jurisdiction and 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 plaintiffs and the 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, Meister, Brown and the alleged FBCCP Church “Trustees” (as alleged Trustees were illegally installed by appointment of

Beck and not confirmed “vote” per the process per BY-LAWS Section Article II. by the Nomination Committee or by vote of the “general congregation” at the next general meeting or every three years as required by the FBCCP BY-LAWS to be followed per Florida Statue 617) actions as Sheriff Deputies “WITHOUT PROBABLE CAUSE” other than conceal their prior criminal acts both as trustees and as sheriff deputies and as general citizens!

Those who ignore the actions of illegal conduct of law enforcement officers, agents and agencies, attorneys and other judges and corporations in violation of contracts or other legal duties then continue the damages and the concealment of the frauds against this PRO SE who is being greatly “deprived of his rights”, suffering great “nuisance” and damages and is still blocked from “seeing and visitation” and with full companionship to and with his children since October 20, 1999, and revealing all omitted truthful disclosure of the maternal mother and maternal family and attorneys, pastors, judges and others, or even taking the testimony of his own children to testify “did your father ever molest/abuse you?” so the “Injunctions” and the continued abuse by the maternal mother and her family and the “pastors schism”, the attorneys, judges and others who allow this fraud can be held responsible for the loss of the invaluable relationship time as the courts warns should not happen in any parent child case! Those who ignore the illegal conduct continue using the “relationship” and “omissions of truthful disclosure” as extortion against Plaintiffs. So all Defendants should be held responsible for the continuing acts of omissions of truthful disclosure to these Plaintiffs thereby continuing the separation and loss of Constitutional rights to freedoms of speech, religion, life,

liberty and the pursuit of Happiness and employment and relationship with all persons in peaceful society.

12. This Court has Jurisdiction to determine 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. This Court should retain jurisdiction to preserve the integrity of the Courts, to expose fraud on the courts and by whom fraud was done.

13. This Court has Jurisdiction per **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.”

14. This Court has Jurisdiction to determine **“Compensation for injuries to and to what 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** as Plaintiff Townsend has plead with each and every person and agency and tried to get help from these Defendants as they have allowed Plaintiffs rights with the children to be abused by the then wife/now former wife and mother as an employee of Ron Beck and Herman Meister and FBCCP Church Trustees through Sheriff Deputies Howlett and Jeffers for the First Baptist Church of Citrus Park Corporation who acted outside the LAW and the BY-LAWS and violated Plaintiffs just

trying to operate civilly under Constitutional Laws and of the Corporation BY-LAWS as was and still is the “duty”. All Defendants who have once they have knowledge of these issues and lied to Plaintiff and alleged Plaintiffs had no rights, lost Plaintiffs 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 by the criminal acts of the “SCHISM” Officers .

CHAMPION v. GRAY 478 So2d 17 (Fla. 1985). Further, in **34 AM JUR. P. 188 Section 231**, the author says, “**Fraudulent concealment of a cause of action from the one in whom it resides, by the one against whom it lies, constitutes an implied exception to the statue of limitations.” Emphasis added.** These abusive actions by BECK and per MEISTER began against Plaintiff Townsend, when Beck and Meister “made a pack” to get rid of this LRPC CHAIRMAN and member so they could pull off their “scheme to fraud” (1) to miss use FBCCP Corporation funds and pad their pockets by fraud and (2) of the Master Building Plan corruption alleged as a “VISION” and started frauds and omissions of truthful disclosure and giving illegal legal advice about Plaintiff to the wife and children and others. Facts are well documented in FBCCP BUSINESS MEETING MINUTES and Corporation Documents Plaintiff still known as a Corporation Member just received by **Order** of the Court in June 2006, and confirmed by Affidavits from Witnesses to the intentional frauds of FBCCP and CPCS alleged pastors and officers Beck and Meister and Leatherman and Howlett and Jeffers and others including various FBCCP members, employees, attorneys, judges and Police officers and Sheriff Deputies and other state employees. In 1996, Plaintiff Townsend per the Duties of the Positions of Service this Plaintiff Townsend pledged to uphold, first began to

alleged that Corporation monies were not being reported per the BY-LAWS Required process “every 90 days” and that alleged closed accounts were being mishandled and kept secret from the “general voting member” and this Long Range Planning Committee Chairman as Plaintiff Randall Townend in violation of the BY-LAWS. “Whistle Blower” retaliation acts of the pastors (Beck and Meister and Nasworthy) now just partly learned began against Plaintiff Townsend and Plaintiff’s family as Plaintiff’s son, J.D.T was 13 and Plaintiff’s daughter, J.G.T., was just 11 years old enrolled as students at Citrus Park Christian School and attending the FBCCP. Beck at the 03/26/1996, Business Meeting Minutes states that the proposal of what the Church can do, will come from the LONG RANGE PLANNING COMMITTEE(LRPC) and as the Plaintiff Townsend as Chairman.

15. This Court has Jurisdiction, 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)

16. **MT. OLIVE PRIMITIVE BAPTIST ET AL v. HARRIS et al.** 860 So2d 520 (Fla.

App 1 DIST. 2003) allows Plaintiff’s rights by stating:

“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, ...”

17. FLORIDA STATUTES 617.0834, Abuse and interference of father/child civil rights and interference with marital counseling and misuse of Credit Cards and frauds Court and frauds to the BY-LAWS “General Voting Members” show acts of Criminal violations of laws.

“Florida Statutes 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.”

PER Wests F.S.A. §95.031, LIMITATIONS OF ACTIONS ¶ 43

“A statute 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.”

The continued concealment of the Corporation Business Records and Credit Card Billing Statements and the obstruction of Plaintiffs knowledge, civil rights, religious rights, parental rights from **or as any “still active member” of the FBCCP Church by frauds** ongoing by the alleged FBCCP clergy, FBCCP alleged Corporation officers, Corporation Attorneys, Judges, Plaintiff’s former attorneys, Plaintiff’s current attorneys (Dickinson) acting allegedly for the Corporation Members and the Corporation to the Courts, and of the Courts and Judges and State agents and agencies as all defendants as stated herein and the concealment and interference of the child abuse and child custody since October 1999, by the collusion of the “FBCCP clergy” and “FBCCP alleged trustees acting as Sheriff Deputies” conspiring with false evidence and omissions of truthful disclosure of

falsehoods against this Plaintiff as a “whistle blower” of Defendants known criminal activity past, present and future to destroy Plaintiffs rights and prevent production of FBCCP Corporation records that still on September 7, 2006, Judge Marva Crenshaw refused to require Attorney Denny acting for the defendants to not comply with the May 10, 2006, Court Order of Judge Marva Crenshaw shows continuing concealment and omissions of truthful disclosure which will overturn all alleged frauds against Plaintiff and still allowing this innocent plaintiff and his children and those plaintiff Townsend sought to protect from criminal activity still being damaged by the injurious falsehoods causing the first frauds of Defendants in September/October 1999, to impede the parental rights of Plaintiff Townsend to his minor children J.D. T. and J.G.T and endanger the lives of Plaintiff’s Children and other Children of and in the FBCCP and CPCS care and supervision of Plaintiff Townsend and other FBCCP “Officers”, alleged officers and employees and the November 2001, Injunctions tried and heard by Judge Raul Palomino on November 15, 2001, brought against Plaintiff Townsend as retaliations by the “FBCCP employees” and others herein or others as “DOE” yet unknown until pending Discovery as the Defendants and attorney Scruggs to conceal known criminal acts of all Defendants herein and then the ACTION FOR DIVORCEMENT filed by the FBCCP Corporation Employee as the wife now former wife of this Plaintiff Townsend as per the November, 2003, DIVORCE JUDGEMENT WITH INJUNCTIONS and AMENDED DIVORCE JUDGEMENT WITH INJUNCTIONS shows the causes of actions “last element” is still accruing by fraudulent inducement and extrinsic fraud being done in the Circuit and Family Courts by the failure of the FBCCP Attorney to produce the “Records” still not being produced per the Courts **ORDER** of May 10, 2006, per Judge

Crenshaw and Judge Crenshaw then refusal to rule during September 2006, on the pending DISCOVERY MOTIONS and other MOTIONS for the protection of Plaintiffs rights (Corporation and Civil) and of still needed discovery of said FBCCP and CPCS Corporation records per this Plaintiff members rights under Florida Statue 617.1601 through 617.1623 and all other guaranteed rights of Plaintiff per the Laws of these United States, the State of Florids and the FBCCP Corporation and CPCS Christian School as binding contracts as Plaintiff still seeks finding the over \$200,000.00 and knowledge of all other violations of the FBCCP BY-LAWS per Plaintiff Townsends rights as still a member and as discovery of these facts is necessary for plaintiff Townsend to present all claims and facts even just under the MALICIOUS PROSECUTION COUNT in case 02-03812, per the rule to present (1) “probable cause”, (2) “malice” (3) by who or whom who had motive and collusion per the Pellgerini Rule and (4) Damages. These Lower Courts seeking to block discovery shows collusion, malice, obstruction of justice and witness tampering by these lower courts continuing the “nusiance” and “risks” to Plaintiffs herein and protects themselves from being proved accomplishes to the “Benefit of Clergy” issue and “misuse of color of uniform” by law enforcement, attorneys, judges and pastors and others.

Further Plaintiff alleges his termination of employment at Kmart/Sears was in direct violation of Plaintiff Townsend’s Civil rights and retaliation against Plaintiff Townsend as a “whistle blower” of known criminal activities of ALL Defendants. Further the collusion by alleged law enforcement, court officers, attorneys and Judges to continue the concealment of lawful information, FBCCP and CPCS

Corporation records from this member as a Plaintiff in now as a former Respondent/Defendant turned Plaintiff continues the frauds and violations of Florida Statues 617 and Rules of Civil Procedure as to disclosure of evidence and continuation of blocking this Plaintiff/Father from the deposing or contact with his children as children and as witnesses and block this Pro Se Plaintiff from “discovery” rights per the Rules of Civil Procedure and prevent defendants from being in good standing with any court as they are in violation of court orders for the production of documents and show “obstruction of justice” and “tampering with witnesses” and blocking this Pro Se from Depositions even of his own children needed for production of evidence even in the Malicious Prosecution Count.

18. 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 and per violations of UNITED STATES CODE violations of TITLE 18, **CRIMES AND CRIMINAL PROCEDURE**, “Section 241, **CONSPIRACY AGAINST RIGHTS**”, “Section 242, **Deprivation of rights under color of law**”, **Section 245, Federally protected activities, Section 246 Deprivation of relief benefits, Section 247, Damage to religious property; obstruction of persons in the free exercise of religious beliefs, Section 373, Solicitation to**

commit a crime of violence, Section 1037, Fraud and related activity in connection with electronic mail and other Sections of the United States Code and Sections of Human Rights as stated herein.

19. The United States of America and State of Florida Constitutions provide and allowed as stated by Judge Crenshaw on May 10, 2006, allowing this statement “no law shall impede the obligation of a contract” in the Second Amended Complaint filed as **TOWNSEND v. BECK et. Al** Case 02-03812, but then refusing to overturn the continuing “Injunctions” and continuing to allow misrepresentation of how the alleged “Legal” Injunctions are still misused to damage the parental and children rights as now able to choose for themselves and know and can know and understand the frauds of injunctions gained by the knowingly intentional, reckless, and negligent omissions of truthful disclosure that prohibit Constitutional rights and freedoms of these Plaintiffs and doing acts and enacting laws or omitting truthful disclosure or enforcing rules that then impeded the obligation of the FBCCP contracts and marriage contracts, attorney client contracts and agencies contracts with citizens and “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. And per the actions of these lower courts, Judge Crenshaw, Judge Stoddard, Judge Holder, Judge Sierra and the Second District Court of Appeals during the periods of on or about October 2005 through present and before October 2006, all lower courts have enacted laws or rulings that “impeded the obligation of contracts” enacted by Plaintiff with these Defendants and thereby each/all Defendants are vicariously and directly or indirectly

liable for the omissions of truthful disclosure and obstruction and extortion of the actions of these other tortfeasors and themselves in violation of these contracts and Constitutional laws and rights.

20. At the time of these matters Plaintiff Randall Townsend was a resident of Hillsborough County and of the State Of Florida, United States Of America and Defendants operated and acted in their positions with or as individuals and doing business and jurisdiction of the laws governing in Hillsborough County and of this State of Florida and of these United States and as a member of FBCCP under the Contract rights and duties of the FBCCP Corporation Constitution, Policies and By-Laws.

21. 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 Courts jurisdiction.

THE PARTIES

22. 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 the Constitution and BY-LAWS of the First Baptist Church of Citrus Park as a Contract with Direct, Indirect and Derivative Rights and as per Plaintiff Randall Townsends Marital Contract Rights and Plaintiff Townsend's post office address is P.O. BOX 21, ODESSA, FL 33556. Additionally, Plaintiff Randall Townsend, Pro Se, pleads to speak on behalf of all minor Plaintiffs as FBCCP and CPCS School Children for whom Randall Townsend served from 1993, through present times even

during the alleged times Beck and other Defendants alleged the FBCCP Membership of Randall Townsend had been alleged “legally terminated” and proved a fraud by the June/July 2006 produced records and therefore Randall Townsend seeks to still serve per his direct, indirect and derivative duties as Church Leader in the Offices of Nominations Committee Member, Long Range Planning Committee Chairman, and Awana Commander and as special liaison as Usher in the role of service to all Associates and Members deprived of their General Voting Rights due to frauds and omissions of truthful disclosure by pastors and trustees and others and Plaintiff Townsend pleads to speak for all plaintiffs in this matter as a Class Action. All plaintiffs reside in the State of Florida.

23. 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 AND PER SUPPLEMENTAL AND AMENDED PLEADING ADDS:

24. **Defendants** as “Associates” per 62 ALR3rd 1165, hereinafter as General Members:
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, AS DEACON, 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, And Deacon.

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, DON BECK, Individually, DON BECK, AS DEACON, JOHN COLLINSON, Individually, JOHN COLLINSON, AS DEACON, BILL CRAFT, Individually, BILL CRAFT, AS DEACON, ROBERT GILES, AS DEACON, ED HOPKINS, Individually, ED HOPKINS, AS DEACON, JERRY MILLER, Individually, JERRY MILLER, AS DEACON, WILSON SMITH, Individually, WILSON SMITH, AS DEACON

are of THE MEMBERSHIP AT LARGE AS “ASSOCIATES” 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 associates and in their capacity as agents of the

Corporation and as members of the Corporation and as the CORPORATION FBCCP. All Defendants reside and or do business in the State Of Florida.

25. 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. Documents revealed in June 2006, revealed GRANT on or about 1999, through some yet unknown time, did for pay “consult and act on behalf of the Pastors Schisms” to promote the fraudulent “VISION” and did knowingly degrade the positions of Townsend as LRPC Chairman alleging frauds of the “VISION” and personally refused to require production of the Corporations financial records demanded in 1997-current times to be seen by this Townsend as stated herein. GRANT at times material hereto also acted as an elected State of Florida Congressman. GRANT maintains his office and residence in Hillsborough County, Florida.

26. 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 these Plaintiff’s 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 Clients as the Plaintiffs and is being sued in Hillsborough County Circuit Court in CASE NO: 05-0911 and 2D06-2811 and as herein.

27. 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 the “alleged Clergy Ron Beck” and 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 omissions of truthful disclosure and willfully violated her own Clients these Plaintiffs and is being sued in Hillsborough County Circuit Court in CASE NO:06-6005. Gray resides and does business in Hillsborough County, Florida.

28. DEFENDANTS KAREN HARROD TOWNSEND, (KAREN HARROD) Individually, and as estranged former wife of Plaintiff and mother and former CPCS school teacher of Plaintiff J.D.T and J.G.T and KAREN HARROD TOWNSEND AS EMPLOYEE OF CITRUS PARK CHRISTIAN SCHOOL A MINISTRY OF THE FBCCP and maternal family as STEVEN TYLER

HARROD, (STEVE HARROD) Individually, DONALD HARROD, (DON HARROD) Individually, NORMA HARROD, (NORMA HARROD) Individually and are being sued in Hillsborough County Circuit Court in case no. 05-9605 with pending Appeals Case 2D06-3469. All Defendants as “Harrod” reside in Pace, Florida.

29. UTICA INSURANCE COMPANY OF NEW YORK, (UTICA) AS THE INSURANCE CARRIER OF AND FOR THE DEFENDANT FBCCP and does business in the State of Florida and as Insurance Company acted and allowed agents to act in “BAD FAITH” and in violations of laws against Plaintiff Townsend and all Plaintiffs in violations of Duty, Directly, Indirectly and Derivatively.

30. CHARLES DENNY, IV, Individually, CHARLES DENNY, IV, AS ATTORNEY AT LAW (Hereinafter as “Denny”) FOR THE FIRM OF DICKINSON & GIBBONS P.A., THE LAW FIRM OF DICKINSON & GIBBONS, P.A. ATTORNEYS AT LAW, (hereinafter as “DICKINSON”) act jointly and are doing business at 401 North Cattleman Road, Suite 300, Sarasota, Florida 34232, and are the attorney for Defendant Ronald L. Beck and Reverend Ronald L. Beck and the First Baptist Church of Citrus Park. Defendant Charles Denny, IV and the Firm of Dickinson & Gibbons, as attorneys for the Corporation of the First Baptist Church of Citrus Park, and by Contract hold a direct and derivative fiduciary duty to the Plaintiffs at times herein and to Plaintiff Randall Townsend herein as Plaintiff Randall Townsend is a member of the Congregational Form of Government as directed by the BY-LAWS of the Corporation of the First Baptist

Church of Citrus Park and has Duties and Rights as a Member to the Corporation as defined or stated herein.

Defendants herein this part reside and do business in the State of Florida.

31. DREW GARDNER, AS Individual, DREW GARDNER AS ATTORNEY AT LAW (Hereinafter as “Gardner”) FOR THE CHRISTIAN LAW ASSOCIATION (Hereinafter as “CLA”) and DAVID GIBBS, III, AS Individual, DAVID GIBBS, III, AS ATTORNEY AT LAW, THE GIBBS LAW FIRM, and DAVID GIBBS III, AS ATTORNEY AT LAW for the “CLA” and per Contract, hold a direct and derivative fiduciary duty to the Plaintiff Randall Townsend herein as Plaintiff Randall Townsend is a member of the Congregational Form of Government as directed by the BY-LAWS of the Corporation of the First Baptist Church of Citrus Park and with Duties and Rights as a Member to the Corporation as defined and stated herein and reside in the State of Florida and do business in Florida.

32. STACEY TURMEL, (TURMEL) Individually, STACEY TURMEL ESQUIRE AS ATTORNEY AT LAW, STACEY TURMEL, P.A. hold a direct and indirect and derivative fiduciary duty to the Plaintiff’s herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts.

Defendant Turmel does business and resides in Tampa Florida.

33. 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, and now as Governor of the State of Florida, held and holds a direct and indirect and derivative fiduciary duty per

Florida Statutes §14.022, §16, § 27.36 and § 27.37 and §617 and others to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts and has specifically refused directly to act per Florida Statutes §617, §623 and other Statutes so required by the "DUTY" of the Officer, Individual and/or agent of said Duty. Defendant Crist resides and does business in and for the State of Florida and refused to act in any capacity said herein.

34. 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, hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Gallagher resides and does business in and for and of the State of Florida.

35. THE DEPARTMENT OF CHILDREN AND FAMILIES OF THE STATE OF FLORIDA, (DCF) operates and has DUTY within the State of Florida to investigate and protect all Children of or in this State, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts.

36. 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, DEPUTY HARRY HOOVER, Individually, HARRY HOOVER AS HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT, AS DEPUTIES OF HILLSBOROUGH COUNTY SHERIFF'S DEPARTMENT AND THE HILLSBOROUGH COUNTY SHERIFF'S DEPARTMENT OF THE STATE OF FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

37. JAMES COATS, AS SHERIFF OF PINELLAS COUNTY FLORIDA, and DEPUTY JOSEPH A. GILLETTEE, SERGENT ADMINISTRATIVE INVESTIGATIONS DIVISION PINELLAS COUNTY SHERIFF'S OFFICE and DEPUTY TIM JEFFERS and THE PINELLAS COUNTY SHERIFF'S DEPARTMENT OF THE STATE OF FLORIDA, (PSCO), and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

38. 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, (Pasco S.O.) and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

39. THE CHIEF OF POLICE OF TAMPA, FLORIDA, and AS POLICE OFFICER JOE KAREAS (Kareas) OF THE CITY OF TAMPA, THE CITY OF TAMPA POLICE DEPARTMENT,(TPD) and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

40. CYNTHIA BARNARD SANZ, Individually, CYNTHIA BARNARD SANZ (Sanz) AS SPECIAL AGENT SUPERVISION FOR THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT,(FDLE) hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

41. MR. GERALD BAILEY COMMISSIONER, (Bailey), FLORIDA DEPARTMENT OF LAW ENFORCEMENT, (FDLE) and GUY TUNNELL as Former FDLE COMMISSIONER and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside

and do business in and of and for the State Of Florida.

42. CURTIS BAUGHMAN(Baughman) as Individually, NANCY LOPEZ, Individually, CURTIS BAUGHMAN AND NANCY LOPEZ AS EMPLOYEES OF VICTIMS ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA,(VA) and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

43. MARK A. OBER, Individually and MARK A. OBER AS STATE ATTORNEY OF HILLSBOROUGH COUNTY FLORIDA,(OBER) and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts.

Defendants herein reside and do business in and of and for the State Of Florida.

44. CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOURGH COUNTY FLORIDA CIRCUIT CIVIL, MANUEL MENENDEZ JR. Individually, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

45. WAYNE TIMMERMAN, Individually, JUDGE WAYNE TIMMERMAN A CIRCUIT COURT JUDGE OF HILLSBOROUGH COUNTY FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein

and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

46. FRANK GOMEZ, Individually, JUDGE FRANK GOMEZ A CIRCUIT COURT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

47. MONICA SIERRA, Individually, JUDGE MONICA SIERRA, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

48. RALPH STODDARD, Individually, JUDGE RALPH STODDARD, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

49. GREG HOLDER, Individually, JUDGE GREG HOLDER, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA, and hold a direct and

indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

50. MARVA CRENSHAW, Individually, JUDGE MARVA CRENSHAW, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts. Defendants herein reside and do business in and of and for the State Of Florida.

51. RAUL PALOMINO, Individually, JUDGE RAUL PALOMINO, A CIRCUIT COURT JUDGE FOR HILLSBOROUGH COUNTY FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts as said herein. Defendants herein reside and do business in and of and for the State Of Florida.

52. RAQUEL A. RODRIQUEZ, Individually, RAQUEL A. RODRIQUEZ AS GENERAL COUNSEL TO THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts as said herein. And as Counsel to and for the Governor of the State of Florida is to by duty to properly inform the Governor to and how to investigate or pursue all allegations

of Criminal acts or violation of laws or policies by any person or persons or of Corporations or of Law enforcement or of agencies or of Courts of the State of Florida or doing business in the State of Florida for the safety and well being of all citizens, especially the children on behalf of whom this Plaintiff speaks.

Defendants herein reside and do business in and of and for the State Of Florida.

53. BROOKE S. KENNERLY, Individually, BROOKE S. KENNERLY AS EXECUTIVE DIRECTOR FOR THE JUDICIAL QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA, and THE JUDICIAL QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts as said herein.

Defendants herein reside and do business in and of and for the State Of Florida.

54. 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, MS. LIEMAN, MS. "DOE" LIEMAN, Individually, THE FLORIDA BAR TAMPA INTAKE STAFF EMPLOYEE MS. JANE CRISTY and Ms. JANE CRISTY, Individually, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts as said herein.

Defendants herein reside and do business in and of and for the State Of Florida.

55. THE STATE OF FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts as said herein.
56. THE CITY OF TAMPA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts as said herein.
57. THE SHERIFF OF SANTA ROSA COUNTY, AND SANTA ROSA COUNTY, OF THE STATE OF FLORIDA, Deputy Sergeant Wheeler and Detective Ryan and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts.
55. HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA, and hold a direct and indirect and derivative fiduciary duty to the Plaintiff's herein and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and fraud on the courts.
56. KMART CORPORATION also known as and doing business as, SEARS HOLDING COMPANY, INC is a Corporation doing business in the State of Florida, with a REGIONAL OFFICE located in Brandon, Florida and the Corporate office at times material hereto was or is located in the State of Michigan and the State of Illinois, of these United States Of America and Hereinafter known as (Kmart/Sears). Kmart/Sears held a duty to Plaintiff as an employee and protections as a "whistle blower" from all illegal acts and retaliations due to Plaintiff Townsend acting per Corporation policies and Laws of this Country, State and County and Plaintiff

Townsend alleges “Kmart/Sears” acted in violation of Title VII of the Civil Rights Act of 1964, and Florida Statutes 760.10 and all laws as shown herein by acts of the Corporation and of the employees in supervision for the Kmart/Sears Corporation and of other store associates.

57. JOE PALKO, Individual, JOE PALKO, EMPLOYEE AS Vice President (Kmart) SEARS HOLDING COMPANY, RANDY BRIGHT, Individual, RANDY BRIGHT, (Kmart) EMPLOYEE AS REGIONAL COACH, KEITH JOHNSON, Individual, KEITH JOHNSON, (Kmart) EMPLOYEE AS REGIONAL HUMAN RESOURCES DIRECTOR, SHANE PEARSON, Individual, SHANE PEARSON, (Kmart) EMPLOYEE AS LOSS PREVENTION DISTRICT COACH, KATHERINE CUNNINGHAM, Individual, KATHERINE CUNNINGHAM, (Kmart) EMPLOYEE AS DISTRICT COORDINATOR SECRETARY, DANIEL J. GENTILE, Individual, DANIEL J. GENTILE, (Kmart) EMPLOYEE AS DISTRICT COACH, DOUG LIVINGSTON, Individual, DOUG LIVINGSTON, AS KMART EMPLOYEE LOSS PREVENTION COACH, AT STORE 3092, ROY ALLEN, Individual, ROY ALLEN, KMART EMPLOYEE AS ASSISTANT COACH, AT STORE 3092, DR. LINDA ROWE CAMPBELL, Individual, DR. LINDA ROWE CAMPBELL, (Kmart) EMPLOYEE AS PHARMACIST AT STORE 3092, BARBARA BOOTH, Individual, BARBARA BOOTH, (Kmart) EMPLOYEE AT STORE 3092, acted independently, and in conspiracy and intentionally, knowingly, recklessly and negligently and has done by acts in violation of Duty, done fraud, omissions of truthful disclosure and done acts in violations of the United States Laws and State of Florida Laws and Pinellas County Laws and violations of Plaintiff

Townsend's civil rights and subjected Plaintiff Townsend to acts of vandalism and racial prejudice and fraud and paint the character and image of Plaintiff Townsend in a bad public light to conspire to conceal the violations of law as advised by Plaintiff Townsend as a "whistle blower" and to violate Plaintiff Townsend's civil rights.

Defendants reside in the State Of Florida at times material hereto.

FACTUAL ALLEGATIONS

58. PLAINTIFF TOWNSEND INCORPORATES ALL PARAGRAPHS STATED ABOVE AND BELOW HEREIN AS FACTUAL ALLEGATIONS TO SHOW THIS COURT AND EACH DEFENDANT TO KNOW THAT THE CAUSE OF THIS ACTION ARISES FROM A RECKLESS AND INTENTIONAL CONSPIRACY BY ATTORNEYS, JUDGES OF THE CIRCUIT COURT OF HILLSBOROUGH COUNTY AND OF THE SECOND DISTRICT COURT OF APPEALS, OF FLORIDA AND BY EACH INDIVIDUAL, OFFICER IN LAW ENFORCEMENT, AGENT, AGENCY AND CORPORATION LISTED HEREIN TO CONSPIRE AND DO BREACH OF DUTY TO CONCEAL PROVED ILLEGAL ACTS OF:

A. RONALD L. BECK as an individual, claiming to act as "Clergy" of FBCCP and

B. HERMAN MEISTER, an individual, claiming to act as "Clergy" and BOTH

Who in Breach of Contract, Breach of Trust and other unlawful acts, formed in 1995 a "Pastors Schism I" to do fraud and omissions of truthful disclosure acting under the disguise as "clergy" misusing the "Color of Uniform" as "Clergy" and intentionally knowingly, recklessly and negligently acting with "Law enforcement officers" acting as alleged "TRUSTEE'S" or various "COMMITTEE MEMBERS" or "Deacons" or as "Associate" hereinafter as General Members:

- C. JOE HOWLETT, an individual, claiming to act as alleged “Trustee” and an Hillsborough County Sheriff Deputy (HCSO) and General Member and
- D. TIM JEFFERS, an individual, claiming to act as a “Finance Committee Member and a Pinellas County Sheriff Deputy and “TRUSTEE” and “DEACON” and General member.
- E. GEOFF SMITH, an individual, claiming to act as First Baptist Church of Citrus Park Corporation President/Trustee and as Deacon and as General Member and as an alleged expert Building Contractor and
- F. GARY LEATHERMAN, an individual, claiming to act as First Baptist Church of Citrus Park Corporation Trustee and as a Deacon and as a General Member and as an expert in issues of finance and as FINANCE COMMITTEE MEMBER and at times CHAIRMAN Of the FINANCE COMMITTEE and Member of multiple Committees at the directive of the Pastor Beck as Plaintiff Townsend alleges Beck and Leatherman acted with Meister and others to conceal all acts of frauds by the acting out of the statement made by Herman Meister as School Pastor/Principle in 2002, stating “we made a pack to deny and destroy anything you (Randall Townsend) say” and the pack actions provided “illusions” of security for their act.
- G. JOHN MICHAEL CORBIN, an individual, claiming to act as a “LONG RANGE PLANNING COMMITTEE MEMBER” and as a Pasco County Sheriff Deputy and General Member
- H. MIKE SMOAK, an individual, claiming to act as a SCHOOL BOARD MEMBER OF Citrus Park Christian School and as a Hillsborough County Sheriff Deputy as at the rank of HCSO Detective, and as a General Member and

I. JOE KAREAS, an individual, claiming to act as a General Member and as a TAMPA POLICE OFFICER

Or with “experts” as attorneys, law enforcement, Judges, public Government officials and others to create a “self serving scheme” and to violate the First Baptist Church of Citrus Park Corporation, The General Voting Membership As these Plaintiffs with vested CONTRACT RIGHTS, DUTIES, OBLIGATIONS and STANDARDS per the Corporation BY-LAWS, AND AS “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 DID THE ACTS OF THE “PASTORS SCHISM I” with the willful Actions of “PASTORS SCHISM II” (as the Pastors with FBCCP ALLEGED “Trustees”) intending to violate these Plaintiffs and misuse FBCCP and CPCS and did conspired unlawful ACTIONS knowingly, intentionally, recklessly and negligently with the Pastors Schisms I & II to violate the FBCCP CONTRACTUAL BY-LAWS RIGHTS, CPCS ENROLMENT CONTRACT RIGHTS, THE UNITED STATES OF AMERICA CONSTITUTIONAL RIGHTS AND THE STATE OF FLORIDA CONSTITUTIONAL AND STATUES RIGHTS, the MARITAL CONTRACT AND FAMILY RIGHTS AND “due process rights” of these Plaintiffs herein.

59. Plaintiff’s Duty was/is to per DUTIES OF THE UNITED STATES AND FLORIDA CONSTITUTION AND CHURCH BY-LAWS and specifically Florida Statues §617 to Investigate violations of FBCCP BY-LAWS and violations of the Constitutional and Contract rights of Plaintiffs and other FBCCP members, per Federal and State Statues as

Florida Statutes 895 and who was actually the violator of these Laws for the protection of the Corporation and know that Plaintiff can prove the case only now with these new facts to show that every law stated in this document can be proved beyond any shadow of any doubt to a jury as the trier of facts. The **Court Ordered** Records, produced in part in June/July 2006, to Plaintiff for the first time, as FBCCP documents even in part prove all claims of plaintiffs as when the alleged Schisms I & II, as FBCCP Officers and as Sheriff Deputies as alleged “legal trustees” from/about 1996 to present have knowingly, intentionally, recklessly and negligently conspired and concealed the misuse of funds and frauds to the Corporation as Proofs of these violations of Criminal laws show Beck and the “Schism” and those that concealed Beck’s frauds and the Schisms members frauds should get JAIL for the violations of all laws as shown herein as they jointly conspired, extorted and concealed acts against the rights of this plaintiff Townsend known now as still a member of the FBCCP Corporation with all BY-LAWS and Florida Statute Membership rights and the attempts by alleged Clergy and alleged trustees conspiring with and by frauds to Plaintiffs, attorneys, Judges and law enforcement led to Plaintiff Townsend being now since September 8, 1999, being alleged “dangerous” and a “liar” and even threatened with jail on the frauds and collusion of Beck and Leatherman and Howlett and Jeffers and Karen Harrod Townsend was forced for the safety of the Townsend Plaintiffs to require Karen Harrod Townsend to leave the marital home or Plaintiff Townsend be falsely arrested on the now revealed frauds by the Schisms to conceal the illegal acts of the Schism and others and all Plaintiffs have been damaged due to the criminal acts, breach of duty and violations specifically of the FBCCP BY-LAWS, that the disagreement by these alleged clergy and trustee to do illegal acts impeded the

rights as stated by minor J.G.T. (age 14), on October 20, 1999, in a note left for her father Plaintiff Townsend when the pastors and deputies and Defendant Karen Harrod Townsend forced these minor children in the quiet of the night while this father was on “duty” as a security officer/supervisor with a “Class D” license at the Citrus Park Town Center Mall, to leave the safety of their home in order to promote, conspire with and to conceal the frauds and omissions of truthful disclosure and criminal acts of the pastors, deputies, officers and Karen Harrod Townsend and her maternal family as “Harrods” and other FBCCP and CPCS employees as stated and incorporated herein to keep Plaintiff Townsend from his rights as a parent, guardian, church member to speak on behalf of himself and others as stated herein to expose the frauds stated by alleged Clergy and Trustees and Karen Harrod Townsend and others.

**“Dad,
Please don’t be mad at us! I don’t know what other option I/we have. It’s not fair just not 2 C mome either! N- ways we’ll C U soon + we’ll give U a call later! OK? Take Care of Peaches, Whisper (family cats) + Shaddow (family dog). Jason needs U 2 set up his bunk-bed in his room, If not we’ll get it later + set up the dinette set in the kitchen too!**

♥- U ~ C-U Soon

♥ - Jen”

And that the causation of these frauds and omissions of truthful disclosure upon Plaintiffs were by intentional means of extortion and direct violation of the FBCCP BY-LAWS to not breach the Duty and Family Rights of any member and Plaintiff Townsend and other Plaintiffs have been caused to fear for their safety due to fraud by alleged “trustees”, pastors miss-using their “mask” as clergy, lawyers, judges and deputies allegedly acting within their alleged legal duty or lack of duty or jurisdiction but all for the “good” of the Plaintiffs and others, instead while using their “masks” to perform and conceal criminal Acts as Plaintiff Townsend alleged on September 8, 1999, now fully confirmed by the

June/July 2006 FBCCP Produced Documents and shows most if not all statements by Beck and Karen Harrod Townsend made to each court, attorney and law enforcement officer to be intentional filing of false reports to law enforcement or courts to tamper with witnesses and obstruct justice as shown herein in direct violation of FBCCP BY-LAWS Sections in full and incorporated herein and specifically as stated:

- (A) “CHURCH POLICIES ...D. COMMITTEE RESPONSIBILITIES AND POLICIES 10. FINANCE. j) A detailed and comprehensive report of all receipts and disbursements, balances, etc., of the Church and the Christian School, shall be given at the quarterly business meeting in writing. Assets and liabilities are to be reported once a year. k) There shall be an annual audit, under the supervision of the Finance Committee, of all books pertaining to Church and School funds, and a report made to the Church each July. l) No purchase shall be made by members of the Church, Christian school, departments or organizations, except within the limits of the budget and approved by the Finance Committee or Business Administrator.”

Plaintiff Townsend in the positions of Nominations Committee, Awana Commander, Budget Committee Contributor, Long Range Planning Committee Chairman and others demanded financial responsibility per the terms of the BY-LAWS, on a daily, monthly and on a Long Term Plan for the completion of the Monthly expenses to support budgeted policy and to complete the expected \$10,000,000.00 Building and Growth Plan but experienced continues frauds of the pastors and finance committee members Leatherman, and Jeffers and others and these partially produced documents of June/July 2006, per the Court **ORDER** of May 10, 2006, of Judge Crenshaw shows the frauds “known” by the Finance Committee and Pastors as Plaintiff Townsend alleged in the 1990’s through current times as many reports are still being concealed from this member in defiance even to the courts **ORDER** to conceal additional “fraud” and “omission of truthful disclosure” and “misappropriation of corporate opportunity” especially proved to date by: (1) the fraud in the purchase and

attempted uses of the new property located at 18105 North Gunn Highway, Tampa Florida and (2) in the FBCCP Corporation Financial Reports, (3) CREDIT CARD uses and (4) frauds of non reporting these purchases not within the allowed DUTY of the Pastor as Ron Beck such as expenses at major and expensive restaurants, trips, or other charges that were made and not reported which (5) eliminated funds for purchases of properly approved items and services.

Further, these excessive and unreported credit card charges, misappropriation of corporate opportunities and other non reported purchases placed the Corporation in a position to require debt or delay to complete necessary projects or purchases per the duties of these Officers in protection of the “total ministry view” to quote from the September 13, 1999, letter of Beck, writing,

“The ministry decisions made have been and will continue to be made with a total ministry view.”

Plaintiff alleged this was pure fraud and omission of truthful disclosure to conceal his breach and frauds of his self dealing now just revealed by the Credit Card statements and the theft of the Awana Property and the frauds of why the Church “HAD” to purchase the Earl property and home just so the Ron Beck “daughters could have more bathrooms” and “have a larger parsonage” and “could live in the country”.

Plaintiff Townsend alleges that had these June/July 2006, Records been produced on September 8, 1999, AS DEMANDED in “SHOW ME THE MONEY” that the inducement to fraud the wife Karen Harrod Townsend, the Plaintiff Minor Children J.D.T and J.G.T and other Church and School members and employees against Randall Townsend would not have been allowed by honorable family and church

members and therefore the position of Karen Harrod Townsend on October 10, 1999, stating “how can you be so right and these other six men be so wrong” and thereby calling Randall Townsend a “liar” in his own kitchen and thereby requiring a marital turmoil based on fraudulent advice of the alleged honorable pastors and trustees and finance committee members using the withheld documents to conceal ongoing frauds enticing false accusations by the “naïve” against this Plaintiff Townsend still to this day because of fraud of alleged “Clergy” as Schism being given unlawful “Benefit” by the Corporation Registered Agent, Lawyers, Judges and Law Enforce and State Officials. This “turmoil” caused by the actions of the alleged “Pastors and Trustees” caused the allegations of “Irreconcilable Differences” leading to and being used in the Divorce Case filed by Karen Harrod Townsend in April 2002. Upon Service of the Divorce Action, Plaintiff Townsend did file case 02-03812, to try to expose the underlying violations of LAWS and BY-LAWS and thereby save his marriage, safety of the mental, emotional and well being of the wife and children and others and expose the frauds of the Schism and stated these issues and requested assistance in the Circuit Court as had been done to the Court of Judge Palomino by filing a COMPLAINT as per the rules as a “short and plain” statement Case as 02-30812, as follows:

“IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT,
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CASE NO. _02-03812

RANDALL TOWNSEND,
PLAINTIFF,

v.

RONALD L. BECK, INDIVIDUALLY, REVERAND RONALD L. BECK,
AS SENIOR PASTOR, FIRST BAPTIST CHURCH OF CITRUS PARK,
(FBCCP) WILLIAM T. BROWN, INDIVIDUALLY, REVERAND WILLIAM T.
BROWN, (FBCCP) AS PASTOR OF ADMINISTRATION, HERMAN MEISTER,

INDIVIDUALLY, REVERAND HERMAN MEISTER, AS PASTOR OF SCHOOL MINISTRIES (CPCS), GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE, (FBCCP) ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, (FBCCP) TIM JEFFERS, INDIVIDUALLY, 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) JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS TRUSTEE, (FBCCP), GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS CORPORATION PRESIDENT, (FBCCP),THE MEMBERSHIP AT LARGE OF d/b/a,FIRST BAPTIST CHURCH OF CITRUS PARK,
AS DEFENDANTS,

COMPLAINT AND DEMAND FOR JURY TRIAL

COMES NOW, RANDALL TOWNSEND, PRO SE, and sues RONALD L. BECK, INDIVIDUALLY, REVERAND RONALD L. BECK, AS SENIOR PASTOR OF THE FIRST BAPTIST CHURCH OF CITRUS PARK, (HEREINAFTER AS FBCCP, WILLIAM T. BROWN, INDIVIDUALLY, REVERAND WILLIAM T. BROWN, AS PASTOR OF ADMINISTRATION, FBCCP, HERMAN MEISTER, INDIVIDUALLY, HERMAN MEISTER AS PASTOR OF SCHOOL MINISTRIES (CPCS), GARY LEATHERMAN, INDIVIDUALLY, GARY LEATHERMAN, AS TRUSTEE , DEACON AND MEMBER OF PERSONNEL COMMITTEE OF FBCCP, ROBERT GILES, INDIVIDUALLY, ROBERT GILES, AS MEMBER OF PERSONNEL COMMITTEE, DEACON,FBCCP, TIM JEFFERS, INDIVIDUALLY, TIM JEFFERS, AS FINANCE COMMITTEE MEMBER, DEACON MARK NUNES, INDIVIDUALLY, MARK NUNES, AS CHAIRMAN OF FBCCP DEACONS, 1999-2000, MIKE SHUMATE, INDIVIDUALLY, MIKE SHUMANTE, AS CHAIRMAN OF FBCCP DEACONS, 2000-, JOE HOWLETT, INDIVIDUALLY, JOE HOWLETT, AS FBCCP TRUSTEE, GEOFF SMITH, INDIVIDUALLY, GEOFF SMITH, AS FBCCP CORPORATION PRESIDENT, DEACON, DR. LON LYNN, INDIVIDUALLY, DR. LON LYNN, AS DR LON LYNN M.D., THE MEMBERSHIP AND DEACONS/OFFICERS, AS d/b/a FIRST BAPTIST CHURCH OF CITRUS PARK, A FLORIDA CORPORATION, AND CITRUS PARK CHRISTIAN SCHOOL, AS A MINISTRY OF FIRST BAPTIST CHURCH OF CITRUS PARK and alleges:

GENERAL ALLEGATIONS

1. This is an action for damages in excess of \$25,000.00.
2. At times material herein, Plaintiff resides in Hillsborough County, Florida.
3. Defendants, reside principally in Hillsborough County, Florida and d/b/a FBCCP in Hillsborough, County, Florida.
4. At times material hereto, Defendants were to serve and protect the interests of this Plaintiff pursuant to the Florida Statues (herein after F.S.) in full and specifically F.S.607; F.S. 817; F.S. 836; F.S. 772.102 points (16,- F.S. 812, theft, related crimes), (18,- F.S. 817,fraud and credit card crimes) (22,- F.S. 836.05, extortion) (23, - F.S. 837, perjury), (25. F.S. 843 obstruction of justice); as such practices show a pattern as per F.S. 772.102(4) (Pattern of Criminal Activity). F.S. 871.01&.02(Disturbing Religious and

other assemblies) and protecting the granted rights of Plaintiff while as a Church Member, Per the CONSTITUTION AND BY-LAWS of the FBCCP Corporation, as attached herein and provide due care in protection of this Plaintiff from harm to his family, integrity, character and emotional well being of this Plaintiff and Plaintiff's family

5. At times material hereto, Plaintiff was a member in good standing and had duties per the FLORIDA STATUES, THE FBCCP CONSTITUTION AND FBCCP BY-LAWS TO REPORT VIOLATIONS OF SAID POLICIES AND PROCEEDURES CONTAINED THEREIN.

6. At times material hereto, Plaintiff became aware of **violations** of these peace protecting governing laws, policies and procedures by the FBCCP SENIOR PASTOR Reverend RONALD L. BECK and Reverend WILLIAM BROWN III and Reverend Herman Meister. And Plaintiff did per F.S.607.1603 as member of FBCCP and as Chair of Long Range Planning Committee requested review of Corporation records when Plaintiff had reason to believe F.S. 607.1620(1) were violated. Plaintiff also had duty to report other acts of Negligence and Frauds.

7. Plaintiff was serving as (1). Chairman of the Long Range Planning Committee, a Church By-Law appointed committee responsible for the growth and expansion of Church services and ministry projects, (2). Member of the Nominating Committee, a Church By-Law appointed committee responsible for staffing persons in leadership roles who did not violate "Code of Ethics and Morals" as stated in the By-Laws and "Statement of Faith" and "Commitment to Serve" and CPCS SCHOOL HANDBOOK (3). AWANA COMMANDER, a Church By-Law appointed position responsible for the leadership of Leaders and Children in ministry care, (4). Assistant Head Usher, A Church appointed position for service to the membership, (5) Fill in Sunday School Teacher, (6) Parent of two children of the Citrus Park Christian School, (7) Husband of an Employee teacher in Citrus Park Christian School.

8. Plaintiff alleges acts of Ronald L. Beck were outside of the scope of his professional duties as Pastor of FBCCP and as a Director of the Said Corporation and **these acts were some if not all retaliations for Plaintiff trying to follow the Florida Statues and By-Laws and in following said codes my good standing proved his negligence and violations of same.**

9. Defendants acting outside of the scope of enacting Florida Statues and FBCCP Constitution and By-laws thus requires personable liability for their actions to cause intentional harm upon this Plaintiff and his family per F.S. 607 & 772 and all other available Florida Statues.

10. Thus upon knowledge of said acts of the FBCCP Leadership, Defendants had a fiduciary duty to constrain Ronald L. Beck, individually, William Brown III, individually, Herman Meister, individually, and as Pastors and **prevent** these actions from causing and inflicting intentional harm, with malice upon Plaintiff and Plaintiff's family as Defendant Ronald L. Beck and William Brown III and Herman Meister, and Gary Leatherman, individually and as Officers of the Corporation and others conspired to cover up his acts which violated the Florida Statues and FBCCP Policies and Procedures as stated in FBCCP CONSTITUTION AND BY-LAWS and CPCS Handbook.

11. Plaintiff alleges acts of William Brown III were outside of the scope of his professional duties as a Pastor of FBCCP and upon knowledge of said acts the Defendant

Leadership had a fiduciary duty to constrain William Brown III and **prevent** his actions from causing and inflicting intentional harm with malice upon Plaintiff and Plaintiff's family

12. Defendant William Brown III, individually conspired to cover up his acts which violated the Florida Statutes and FBCCP Policies and Procedures as stated in FBCCP CONSTITUTION and BY-Laws.

13. In coercion Ronald L. Beck, William Brown, III, Herman Meister, Tim Jeffers, Mike Shumate, Joe Howlett and Gary Leatherman did jointly and independently conspire to tamper with "fact finding" and "cover up" evidence and "tamper and intimidate with witnesses" in order to Obstruct Justice.

14. Plaintiff and Defendants observed multiple misstatements of facts by Ron Beck including:

- a. the unreported special money accounts not included in the Corporation financial statements
- b. his using deception that the report submitted was true
- c. calling Plaintiff a "sower of discord" in the April 27, 2000 meeting before the deacon board
- d. calling Plaintiff a "liar" in the April 27, 2000 meeting before the deacon board.
- e. Alleging Plaintiff had a "stress related breakdown"
- f. Alleging Plaintiff was "potentially violent" in the meeting on April 27, 2000, before the deacon board
- g. Alleging Plaintiff was "sowing discord" when Plaintiff pointed out Ron Beck for his own sole personal betterment stole a microphone from the Awana Childrens Designated ministry use
- h. Alleging Plaintiff was wrong for speaking up and rebuking a Pastor who per Pastor allegedly had the right to take property designated when Pastor said he did not have money to buy his own.
- i. Alleging Plaintiff was "sowing discord" when Plaintiff alleged that **had all monies been reported**, sufficient money was available to buy a new microphone rather than waste money on having the property rekeyed or buildings remodeled.

15. Plaintiff on or about July/August, 1999, observed William Brown III in an immoral act upon Plaintiff's wife.

16. Plaintiff observed multiple acts of negligence and fraud by William Brown III, which compromised the safety and wellbeing of minors in the care of Plaintiff as Awana Commander. Such acts Defendant Brown agreed would be done prior to the arrival of the Awana children so their safety was not in danger. These agreed tasks included:

- a. moving a lattice piece of furniture from the Fellowship hall which did in the Awana meeting in August 1999, fall on a 3 year old child.
- b. Setting up space for the Awana children to meet with proper chairs and tables free from harmful objects
- c. When said tasks were not completed Defendant Brown did with FRAUD blame others when the facts later proved Defendant Brown said he forgot to advise others in his care to perform the duties he had promised to perform for the safety of the

Awana Children.

17. When the agreed conduct was not done by Defendant Brown, Brown determined to commit fraud that he did not keep safe the welfare of the children and others.

18. On multiple occasions Plaintiff witnessed acts of Defendant Brown which violated “trust” and “compromised safety” of the Awana children to the degree that his conduct must be stopped in order to protect the children from actual harms and future harms. One specific act included requiring approximately 45 Awana children and adults to ride in a bus that did not have insurance, a proper license tag, and had been reported to have faulty brakes and clutch. This despite the fact that Defendant Brown and Defendant Beck had notification for each day of that week that said bus would be used for the Awana Camping trip.

19. When Plaintiff rebuked Defendant Brown for his violations Defendant Ron Beck and other Defendants willfully label Plaintiff as “sowing discord” and willfully added additional duress on Plaintiff and his family as extortions for Plaintiff to keep quiet about all the violations by the Pastors.

20. Said acts of extortion and witness tampering include:

- a. Defendant Ron Beck telling a Hillsborough Sheriff Deputy to keep Plaintiff away from the Property by giving False statements to a Deputy
- b. Defendants from the Church stage will advise the congregation that Plaintiff is a “liar”
- c. Defendants institute fear in others who do not know the truth and Defendants advise others Plaintiff is “Potentially Violent” and “Dangerous” to their safety
- d. Defendants illegally using the Church By-laws voted and did expel Plaintiff from the membership
- e. Defendants did use fraud to the membership and misused the wording in a letter written by other pastors in an effort to get Ron Beck from continuing his abuse to say Plaintiff resigned his membership from the FBCCP
- f. Defendant Ron Beck informed others if Plaintiff was seen on the property he (Ron Beck as pastor) had to be notified immediately and Defendant Ron Beck informed Plaintiff if seen on the property he Ron Beck would have Plaintiff arrested for trespassing.
- g. On or about July, 2001, Defendant received a Church Bulletin as an SPECIAL INVITATION FROM SEVERAL CHURCH MEMBERS to attend a Special Business Meeting to discuss the Defendant William Brown III keeping his leadership position but Defendant Ron Beck wrote to Plaintiff to not speak at said meeting and advised Plaintiff in said letter that If Plaintiff tried to speak he would be arrested under Florida Statues 871
- h. When Plaintiff arrived in a civil manner and waited on the public sidewalk until the meeting was to start, Plaintiff was informed by Defendants Joe Howlett an HCSO, Tim Jeffers, a PCSO, and Mike Shumate, as Chairman of the Deacons, Plaintiff was not allowed to enter the property.
- i. Defendants did even taunt Plaintiff to enter knowing instructions were given in the yet not received letter that entering would allow Joe Howlett as HCSO to arrest Plaintiff in order to keep Plaintiff from releasing key information

to the congregation. Defendants also blocked Plaintiff from civil speaking to his own wife as she exited the meeting.

j. Said acts as they did happen were later intentionally and with malice misrepresented to the Honorable Judge Palomino by Defendant Ron Beck in Plaintiffs trial on “Repeated Violence” and “Stalking” Charges brought by Defendant Ron Beck. Judge Palomino dismissed the charges.

k. Plaintiff alleges that Defendant Ron Beck has used his wife and daughters in deceptions in order to assert additional frauds to others unknowing citizens and including Judge Palomino on November 15, 2001, which represented Plaintiff as a “potentially violent” person said daughters should be and are afraid of Plaintiff.

l. Plaintiff alleges that the acts of Defendant Ron Beck and other Defendants of warning of trespassing, the warning letter of July 2001, and the Charges of “Repeated Violence” and “Stalking” are EXTORTIONS causing great Duress on Plaintiff and also are OBSTRUCTIONS OF JUSTICE which deny Plaintiff the safety and protection his Constitutional rights to “Life, Liberty and the pursuit of Happiness.” These acts also allow the violations of Defendants to keep hid and do not allow Plaintiff to regain his integrity that was stolen and slandered by Defendants and or allow the Plaintiff to be able to reunite Plaintiff family who now is faced with Divorce due to the stress of this matter.

m. Defendants repeatedly making false statements to Plaintiffs wife and children regarding the conduct of Plaintiff and Plaintiffs account of facts. Said communications are evidence in letters, tape messages and in the transcript before Judge Palomino on November 15, 2001

20. At last , on January 14, 2002, Plaintiff was advised by Principle/Pastor Herman Meister that Plaintiffs daughter, Jennifer was directed to seek medical examinations due to her “excessively missing school” and physical complaints of “migraines and stomach conditions”.

21. Plaintiff alleges that as attending physician for (Wife) Karen and (Daughter) Jennifer Townsend, also acting as Citrus Park Christian School recommended Doctor that Dr. Lon Lynn and CPCS were negligent in not acting sooner upon receipt of Plaintiffs registered letter notifying said parties of Plaintiffs concerns of physical harms and depression being experienced by wife Karen and child Jennifer Townsend. Such duress is witnessed by the missing of school concern by Herman Meister finally addressed in 2002..

22. Such pain and duress and harm was due to the intentional lying and fraud coverup by Ron Beck and others listed as they continued to harm Plaintiff and Plaintiff’s family with the shame as stated.

COUNT ONE : INTENTIONAL INFLICTION OF EMOTIONAL DURESS

23. Plaintiff reaffirms and includes all points above and herein and alleges:

24. In order to cover up the trail of sins/acts and the exposure of these acts listed in points above Ron Beck did on September 8, 1999, terminate Plaintiff from all volunteer positions of his duties to FBCCP and Citrus Park Christian School

25. Such act of termination of duty was to express the power of a Senior Pastor over the matter in order to Obstruct Justice and Obstruct obedience to the Florida Statues and Church By-Laws and shame Plaintiff into not being able to report misconduct.

COUNT TWO: DEFEMATION OF CHARACTER

26. Plaintiff reaffirms and includes all points above and herein and alleges:

27. Wherefore, Plaintiff contends said acts reported above herein were malicious and deliberate acts with the intent of the “termination” to show others that Plaintiff was “unfit for service” due to some “special powers” and “special knowledge” as a Pastor, Ron Beck held in confidence and could not repeat due to his “calling” which allegedly allows him not to with facts release his secrets. Plaintiff alleges the acts of Ron Beck individually, were intentionally covered by the role of Pastor Ron Beck so as to defame the character of Plaintiff so the acts of Ron Beck, individual and as Pastor Ron Beck would not be told to the Church Body who may find his services did violate the Florida Statues and Church By-laws.

28. Plaintiff alleges that said acts were done with intended malice and with the intent to defame Plaintiff so any and all charges by Plaintiff would be disgraced as just “false accusations” of a “stressed out” member seeking revenge.

Wherefore Plaintiff prays for relief as this court seems just.

COUNT THREE: LIBEL

Plaintiff reaffirms and includes all points above and herein and alleges:

29. Defendant Ron Beck as Pastor has used letters and multiple verbal messages that harms the integrity of Plaintiff by stating Plaintiff is not right with God.

30. Said statement is used by Defendant Ron Beck to again assert some special knowledge he says his Pastor position gives him but said statement has no basis for fact of truthfulness.

31. Said statement is for the purpose of continuing the damage to plaintiffs integrity so acts of Ron Beck will not be exposed.

COUNT FOUR: SLANDER

32. Plaintiff reaffirms and includes all points above and herein and alleges

33. Statement in April 27, 2000, Deacons meeting that Plaintiff was “sowing discord” made by Ron Beck was injurious to Plaintiff for the purpose of disproving the facts trying to be exposed about the illegal conduct of the Defendants, Beck, Meister, Brown, Leatherman, and Jeffers and intended to make other deacons in the room who had little or no knowledge of the truth of the previous challenges but drop all suspicions and discredit Plaintiff.

34. Plaintiff alleges that on April 27, 2000, Defendants did yell out “keep your hands on the table” when Plaintiff reached for his Bible which had been placed on the floor. Said Bible contained Plaintiffs outline of matters that needed to be asked from the Defendants in front of the Deacons as a Disciplinary Review Board.

COUNT FIVE: NEGLIGENCE IN CARE OF A MINORS

35. Plaintiff reaffirms and includes all above points herein and states:

36. Said act of not removing “lattice furniture” from Fellowship hall prior to meeting of Awana Children was agreed to be done by William Brown III, Herman Meister, and Ron Beck all on the day of the meeting but said act was not Performed.

37. Said act not being performed was a pattern of acts not performed based on promises made to keep safe the Children and harm did happen to an innocent little

girl. Plaintiff was required to take the blame for the act to the little girl and accept the wrath of the father of the little girl on behalf of the Church. Said act was due to the intentional negligence and patterns of unkept promises consistently being broken by the Pastors.

COUNT SIX: NEGLIGENCE IN CARE OF JENNIFER TOWNSEND, A MINOR

36. Plaintiff reaffirms and includes all above points herein and alleges:

37. Defendants were advised of harm being intentionally done by Ron Beck causing unnecessary pains and stress on a minor Jennifer, daughter of Plaintiff, because actions of Ron Beck and Herman Meister were putting her in multiple shameful and shameful situations because of the false charges being told about her father this Plaintiff.

38. Plaintiff repeatedly asked for Defendants to do their By-laws and professional duty to investigate all the facts and then stop the wrongful abuse on Plaintiff and thus stop the shame on Plaintiff.

39. Plaintiff alleges that Dr. Lon Lynn did delay the proper remedy available to Jennifer due to his attempting to cover up the acts done by Defendants wrongfully accusing Plaintiff. Said attempt to just ignore the reported problems including eating disorders and stress related problems did as reported by other doctors add to the harm of Jennifer.

COUNT SEVEN: DEFEMATION OF CHARACTER

40. Plaintiff reaffirms and includes all points above and herein and alleges:

41. On or about November 2001, Defendant Ron Beck did file and affidavit with the Court containing fraudulent statement as “date known” and “location of employment” and other statements said in the court which were intended to charge Plaintiff with “REPEATED VIOLENCE” and “STALKING”

42. Said charges were made with malice in order to tamper with the position of the court against Plaintiff and as to keep Plaintiff from his family rights

43. And as to keep Plaintiff from speaking to other Church or School members and thus keep the violations of Florida Statues and By-laws from being exposed.

44. Said attempt at the restraining order was an additional attempt to block the discovery and pursuit of facts required in protection for this suit at hand.

45. Wherefore, Plaintiff prays this court will allow F. S. 772.104 and F.S. 772.11 and F.S. 772.185 and any and all other remedies available to this court to benefit Plaintiff as redress for the harms caused by these Defendants.

COUNT EIGHT: INJUNCTIVE RELIEF

46. Plaintiff re-allege and includes all points herein and alleges;

47. Wherefore, Plaintiff prays for Court ordered support of all discovery of documents, financial and Business Meeting Minutes being hid by the Defendants as officers of the Corporation and needed to prove Plaintiffs issues for this Court.

44. Wherefore, Plaintiff prays that this Honorable Court will immediately direct all Defendants to stop retaliations against Plaintiffs family since “turning the other cheek” now for many years has not stopped these Defendants from their abuses and misuse of power

45. Seal this complaint and all issues with a gag order and hold all issues with

secrecy so no additional damages will be done for all parties involved.

Wherefore, Plaintiff prays this Honorable court will:

- a. award Compensatory damages, Punitive damages and Treble damages and
- b. direct the Secretary of State and or Hillsborough County Sheriff to review the licensees and actions of these Pastors and Defendants for their roles in obstruction of the Florida Statues.
- c. allow a Jury Trial on all issues before this Court
- d. Grant Plaintiff such other relief as this Court seems just and proper.

Respectfully submitted,
Randall C. Townsend, Pro Se
P.O. Box 21,
Odessa, Fl. 33556
813 920-9633
By: _____
Randall C. Townsend

Certificate of Service

I hereby certify that a copy of the foregoing was provided by U.S. Mail this ___25___ day of April 2002, to First Baptist Church Citrus Park as Corporation and as said members as Defendants at 7705 Gunn Hwy. Tampa, Florida, 33625.

signed _____
Randall Townsend”

This Complaint in January 2003, was Ruled by Judge Arnold to Amend the Complaint and did not dismiss the litigation and this Ruling by Judge Arnold was immediately given to and completely informed attorney Scruggs who was to litigate and defend Townsend and all persons for whom Townsend spoke in this case and the 02-4974, Divorce Case on or about during January 2003, to Judge Timmerman and thereby the ruling of Judge Arnold a new Amended Complaint was filed and Plaintiff Townsend added a Count for Malicious Prosecution. Based on the fraud of case law by Attorney Denny, Judge Crenshaw dismissed all counts except the count of Malicious Prosecution. Judge Crenshaw with her rulings of March 1, 2006 through September 22, 2006, became aware of her participation and fraud on the Plaintiffs and violations of the rights of these Plaintiffs to present a case and however recused herself rather than Sanction Defendants as shown herein and said action was again an extension of the “Benefit of Clergy” Law.

(B) PROHIBITS THE “SCHISM” USING VIOLATIONS OF FAMILY MEMBERS

CONSTITUTIONAL AND STATE RIGHTS AND BY-LAWS RIGHTS IN:

“Article III (Membership) Sec. 7. Discipline of a Member.

- (A) There shall be a Discipline Committee consisting of the Pastors and the Board of Deacons. These men shall have sole authority in determining heretical deviations from the Statements of Faith and violations of the Church Covenant. If the Pastor or a deacon is subject of a disciplinary matter, he shall not sit as member of the Discipline Committee. He shall be entitled to the same steps as other Church members and be subject to the same discipline.
- (B) Members are expected to demonstrate special loyalty and concern for one another. When a member becomes aware of an offense of such magnitude that it hinders spiritual growth and testimony, he is to go alone to the offending party and seek to restore his brother. Before he goes, he should first examine himself. When he goes, he should go with a spirit of humility and have the goal of restoration.
- (C) If reconciliation is not reached, a second member, either a deacon or the Pastor is to accompany the one seeking to resolve the matter. This second step should also be preceded by self- examination, and exercised in a spirit of humility with the goal of restoration.
- (D) If the matter is still unresolved after the steps outlined in subsections (B) and (C) have been taken, the Discipline Committee, as the Church representatives biblically responsible for putting down murmuring, shall hear the matter. If the matter is not resolved during the hearing before the Discipline Committee, the Committee shall recommend to the Church that they, after self-examination, make an effort personally to go to the offending member and seek that member’s restoration.
- (E) If the matter is still unresolved after the steps outlined in subsections (B), (C), and (D) have been taken, such members who refuse to repent and be restored are to be removed from the membership of the Church upon a majority vote of the membership present at a meeting called for the purpose of considering disciplinary action.
- (F) No matter may be heard by the Discipline Committee or the Church, unless steps outlined in subsections (B) and (C) have been taken, except in the case of a public offense.
- (G) If an unrepentant offending party is removed from the Church membership, all contact with him from that point forward must be for the sake of restoration (except family members).”

Plaintiff Townsend alleges that the Pastors, Trustees and Select Associates and officers did knowingly, intentionally, willingly and recklessly violate the BY-LAWS Contract Process and did intentionally ignore the claims of Plaintiff Townsend and did give

“benefit of clergy” privilege to the now proved unfounded allegations by the Schism in order to benefit themselves and did use extortion of the Townsend family members in the scheme to continue the acts of the schism and violations of their respective Contract(s) and or Constitutional duties.

Plaintiff Townsend did by verbal and written actions and even sneaking into the January 2000, Business Meeting and did inform and announce:

“In tonight’s sermon you stated many people who in exercising their faith stood alone. With Regret I have to tonight go public. I must continue to follow through with the road outlined this summer by Gary Brown in his Sunday School Lessons, “How to Reduce Conflicts”. As a leader appointed by the Church to serve I by God’s Grace went to two Brothers Buddy Rawls and Gary Leatherman about a series of matters that needed fact finding service, Grace with Salt in my one on one attempts to resolve Church matters. I followed Scripture. On 9/8 I was accused falsely by Pastors who acted without the full facts. Since that time Matt 18 has continually been ignored.

Also the matters are not resolved but continue to harm the name of Christ.

Since Pastor Beck says He is too busy to resolve these matters I would appreciate this Body of Christ guide me to a person or persons to hear the matters per Step 2 of Matt18.”

As this step followed the BY-LAWS and the Moderator of the January 2000, Business Meeting Ron Beck did allege even multiple frauds and acts and directed Randall Townsend to bring the matter to the PERSONNEL COMMITTEE (PC) for determination rather than convene the CHURCH DISCIPLINE COMMITTEE (CDC) to investigate the Allegations for or against Townsend and further upon review of the actions by the Personnel Committee(PC). Said members report that Gary Leatherman as member of the PC did conduct the process and did practice fraud, omissions, concealment with the PC, admitted by Chairman Jim Leahy and therefore Plaintiff Townsend alleges fraud and omissions of truthful disclosure and breach of contract from the PC in the reports given to Plaintiffs, the Townsend family, Deacons, and the General Voting Members and others. Plaintiff Townsend further alleges that until review of the Business Meeting Minutes of

April 30, 2000, Townsend could not plead to the Deacons yet at previous times or at the April 2000, (due to threats and allegations of slander and breach of contract process in the meeting by Howlett, Jeffers, Giles and Beck), Deacons Discipline Committee Meeting as even stated on April 30, 2000, by Mike Shumate as Chairman of the Deacons per the June/July 2006, BUSINESS MEETING RECORDS was not ready to announce findings to the General Voting Members as due to the fraud and omissions of truthful disclosure and breach of contract of the Schism even the Deacons were being placed in breach of Contract and as Townsend could not plead to the Church Discipline Committee all matters against the Schism and thereby the Schism continued their frauds as reported herein and specifically in the letter of Ron Beck of June 16, 2000, stating:

“Randy:

I was truly grieved to receive your recent “response” to my letter to notify you of the Deacons’ decision to accept your withdrawal from our membership.

In your “response” you state that the action taken by the deacons to remove you from membership was “invalid”.

I sense some real confusion on your part, so please allow me to share with you just how valid their decision was.

First of all, what you may not understand is that the deacons were not acting simply as a body of deacons, but as **Church Discipline Committee**. According to our church bylaws, page 10, *Discipline of a Member*: “These men(the Discipline Committee) shall have **sole authority** in determining heretical deviations from the statement of Faith, **and violations of the Church Covenant.**” **The Church Covenant** is found on page 12, and as an unruly brother you are in multiple violations of that covenant.

Secondly, you yourself sent a letter by a church member to read to the Discipline Committee requesting your membership be removed. I cannot find anywhere in our church bylaws where that requires a church vote to be valid.

So, to say that the letter I sent you was “invalid,” and to say that the Discipline Committee’s vote was “invalid” is **incorrect**.

You had a right to know that you have been removed from membership and that was the purpose of the letter.

Therefore, per your request, and the unanimous decision of the Church Discipline Committee, you are no longer a member of the First Baptist Church of Citrus Park.

Sincerely,

(Signed)

Ron Beck

Sr. Pastor

P.S. Although I did not give you permission to make copies and distribute my previous letter, you have my permission to distribute this letter to whomever you like.”

Further, upon publication of this letter to the General Voting Members and to the

Deacons said deacons and General Voting Members further gave ‘Benefit to Clergy’ and continues the frauds and Breach of Contract and Trust and Omissions of truthful

disclosure and the extortion against the Townsend family and Plaintiffs as stated herein.

(C) “Article V, Section 4. BUSINESS MEETINGS (b)...Due notice and substance of the meeting shall be given publicly from the pulpit, the Church Bulletin, or the Church newsletter (The Focus) at least 7 days preceding the date of the meeting.”

Plaintiff Townsend alleges the BY-LAWS ARTICLE III, Process was not followed and the Pastors and Trustees and Deacons intentionally, knowingly, negligently and recklessly violated the BY-LAWS and until partial production of documents in June/July 2006, Plaintiffs have not been allowed BY-LAWS rights to know said rights or actions or to speak to protect from abuse these innocent children or protect their rights because of car chases and physical treats and even pastors assisting Karen Harrod Townsend in moving from the marital family residence in secret from Randall Townsend to induce fear and speculation and slander against Randall Townsend, thus assisting the “scheme” of the Schism and this act was and is in no way an act allowed by the BY-LAWS as an act of “restoration” but an act of fraud, breach of contract, breach of trust, omissions of truthful disclosure and seeking an opportunity to deprive persons of the Plaintiffs and of the FBCCP Corporation while the “schism” alleged to act honorably.

(D) “(d) The government of the Church shall be vested in the hands of the members, and a majority vote of those present and voting shall be effective to bind the Church (except in calling a Pastor or Staff Minister, or in effecting a change in the BY Laws, Constitution or Policies, where a 2/3 majority of those present and voting is needed).

By Townsend being denied/delayed in court, slandered, held hostage, or abused by

Deputies Howlett, Jeffers, Smoak, Kieras, Corbin and others and as confirmed by the under oath testimony of Beck to Judge Palomino on November 15, 2001, Case 01-15813, and per the Federal Express Package and Letter Sent to Plaintiff Townsend of July 26, 2001, on FBCCP letterhead stating:

Mr. Randy Townsend:

This letter is in response to your fax dated 7/24/01.

We have never excluded anyone from worshipping here at 1st Baptist Citrus Park. If you desire to attend this Sunday evening's service and worship with the members here you are more than welcomed to do so.

Let me make some corrections, however, to some of your comments contained within your fax.

First of all, the business meetings of 1st Baptist Church of Citrus Park are not "PUBLIC Business meetings" as you stated in your fax. What this means is that although visitors are welcomed to attend our business meetings, they will not be given the floor for discussion in the meeting as that is a privilege reserved for the membership of the church.

If a visitor attempts to speak, or in any way disrupts the business meeting, they will be escorted from the building and the property.

Enclosed you will find a statutory law that prohibits the disruption of Church meetings.

Secondly, as far as walking the aisle and joining the church so that you can speak, that also is not an option. Randy, you are out of fellowship with this Pastoral Staff, Deacon body, and Church membership, so taking that action is not possible either. In addition, your letter of request for removing your membership is on file, and was approved unanimously by the church body.

I continue to pray for your reconciliation with God and your family. These two things are much more important than speaking in a business meeting.

Sincerely,

(signed)

Ron Beck

Attachment—

Florida Criminal and Vehicle Handbook page 932, published by J.B. Gould,
Printed in the U.S.A @2000,

CHAPTER 871

DISTURBING RELIGIOUS AND OTHER ASSEMBLIES

(Complete Chapter)"

This letter revoked again the rights of Plaintiff Townsend and for who Townsend attempted to speak as on the agenda announced in the Church Bulletin of July 22, 2001, the announcement stated;

“Quarterly Business Meeting

Sunday, July 29,
After the evening service
Voting on Pastor Bill Brown
Finance will be giving the end of the year report”

And Plaintiff had been specifically invited to attend by several people to get in the “public view” many issues being concealed and even Buddy Rawls walked across the street and handed the July 22, 2001, Bulletin to Townsend so he would attend but then was “battered” and the wife was “battered” and the Townsend children and others were “battered” as reported 11/01, by Beck in his own words to the court, verbal and affidavits. As Scruggs did nothing “to make the church look bad” during the 11/15/01, and then thereafter did ex parte actions with Judge Palomino and other judges as Timmerman with Stacy Turmel in the Divorce Action filed by Karen Harrod Townsend to conceal “truth” from the Courts and his clients now these Plaintiffs as Turmel when confronted by her frauds to the courts demanded sanctions against Townsend for “playing attorney” and allegedly not filing for an **ORDER OF REFERRAL TO THE GENERAL MASTER** when this ORDER had been presented to Judge Gomez but for the frauds to conceal the actions of Timmerman, Scruggs and Gray, Judge Gomez has his Judicial Assistant, Mrs Gunn, quietly without explanation or ruling of Judge Gomez return the Motion to Plaintiff Townsend and stated the Judge said “he had no jurisdiction because the matter was in the appeals court.” And as further evidence of extrinsic fraud Judge Gomez recusing himself because of his Ex parte actions with Scruggs and frauds on the Court not to reveal fraud on the Court by his refusal to Apply the ORDER OF REFERRAL TO THE GENERAL MASTER while the case was passed from Judge Timmerman to Gomez said in agreement with Attorney Stanford Solomon in the Hearing of August 16, 2004, in

the Townsend v. Townsend case no 02-4974, stating:

PAGE 7-

“And there is no such thing as a limited appearance; once you are in, you are in.

So, I sent my documents to her as the lawyer for fear that Mr. Townsend would be concerned or would lodge some complaint to some authority some place, maybe the Attorney General, maybe the Bar, maybe the Court, maybe with somebody that he was being contacted directly and he was represented by counsel. Other than that, I don't know what he is talking about.”

Yet at the next hearing 10/12/04, on case 02-4974, Stanford Solomon knowing he assisted Gray, Scruggs and Harrods in fraud uses the “limited appearance” argument and Judge Sierra is negligent in not even have been given the Court files from the Clerks office but again shows prejudice, bias, fraudulent application of the “rule of law” and violation of Civil Rules of Procedure and violation of the rights of Plaintiffs and grants a complete release for the fraudulent and contempt of and frauds on the courts done by the actions of Stanford Solomon concealing frauds of himself, and his fellow attorneys and judges and of his clients, Karen Harrod Townsend as or in all “roles” (wife, former wife, mother, FBCCP employee, FBCCP member, Plaintiff, Defendant, as presented in the action of case 05-9605, ruled as Res Judicata by Judge Holder and again herein this now Federal Action proving the frauds of Scruggs ran from June/July 2000, to present times and tainted evidence, attorneys, Judges and the reputation of the entire court system of Hillsborough County and the 2 DCA, the Florida Bar, the JQC and each State or County agency or agent for whom Scruggs, Grant, Gibbs, Gardner, Gray, Denny and Rolfes intentionally acted for or against to oppose the Plaintiffs herein of the “rights” and “jurisdiction” issues even stated by Stanford Solomon to the “DUTY” of the Florida Bar, THE JUDICIAL QUALIFICATIONS COMMITTEE, THE ATTORNEY GENERAL OR ANOTHER COURT or any state agency and even Judge Gomez out of fear of breach

of rules of law and under the "RULES OF ETHICS" recused himself because he was on a NOTICE OF APPEARANCE and as was also on the same NOTICE OF APPEARANCE,
Was served AS:

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

CASE NO. __02-4974__

IN RE: THE MARRIAGE OF
KAREN HARROD TOWNSEND,
Petitioner/Wife,
And
RANDALL C. TOWNSEND
Respondent/Husband

NOTICE OF HEARING

TO: Charles W. Denny, IV 1750 Ringling Blvd. Sarasota, FL 34236	Ronald L. Beck First Baptist Church of Citrus Park 15305 Heathridge Drive, 7705 Gunn Hwy Tampa, Fl 33625
The Membership At Large Of the First Baptist Church Of Citrus Park, Incorporated 7705 Gunn Highway Tampa, Florida 33625	Stacey Turmel, Esquire 2124 West Kennedy Blvd Suite A Tampa, Florida 33060
Stanford R. Solomon, Esquire 400 North Ashley Plaza Suite 3000 Tampa, Florida 33602	Charles Scruggs, Esquire 419 West Platt Street Tampa, Florida 33606
Heather Gray, Esquire P.O. Box 2668 Riverview, Florida 33568	Karen Harrod Townsend 3109 Able Avenue Pace, Florida 32571-9514
District Court of Appeals P.O. Box 327 Lakeland, Florida 33802	Curtis Baughman Victims Asst. 800 East Twiggs Street Tampa, Florida 33602
Legal Affairs Office Of Attorney General 2002 N. Lois Avenue Tampa, Florida 33602	Mark Ober, Esquire State Attorney's Office 800 East Twiggs Street Tampa, Florida 33602
Honorable Judge	Honorable Judge

Marva Crenshaw
800 East Twiggs
Room 519
Tampa, Florida 33602

Frank Gomez
800 East Twiggs
Room 429
Tampa, Florida 33602

Honorable Judge
Raul Palomino
800 East Twiggs Street
Tampa, Florida 33602

Honorable Judge
James Arnold
800 East Twiggs Street
Tampa, Florida 33602

Judge Wayne Timmerman
800 East Twiggs Street
Tampa, Florida 33602

Clerk of the Court, Family Law
800 East Twiggs, Fourth floor
Tampa, Florida 33602

PLEASE TAKE NOTICE that the undersigned will call up for hearing:

ISSUE: **Motion for Contempt Of Court And Sanctions**

Judge: Honorable FRANK GOMEZ

Date/Time: August 16, 2004

10: 00 AM

And by this NOTICE OF HEARING AND THE ACTION OF JUDGE GOMEZ TO:

(1) Recuse himself and (2) suggest the RULES OF ETHICS barred him hearing any matters then the Second District Court of Appeals, Judge Crenshaw, and Judge Arnold and others were also placed on legal NOTICE sufficient to require their immediate Duty, response, presence in the Court or Recusal of the Courts but rather Judges of the 2DCA, even acted on cases 02-4974 as Townsend v. Townsend, 02-03812 as Townsend v. Beck, and on 05-0911, as Townsend v. Scruggs, to contain, conceal and do frauds on the Courts as did Judge Crenshaw and Arnold to continue and limit and harm the "RIGHTS" of Plaintiff's as stated herein.

Judge Sierra, knowingly, intentionally, recklessly and fraudulently refused the multiple Motions, Letters, Request for Hearings, Petitions, Pleading of respondent turned Plaintiff Townsend and refused to get involved in the 02-4974 Case until late 2005, when Judge Sierra would only Rule for a Mediator to intervene so the Garnishments would be

stopped as the Garnishment payment per the Ruling of Judge Timmerman for the alleged owed back child support had been overpaid but Judge Sierra, refused and still refuses to be involved so as directed by the Clerk of the Family Court and of the Civil Court the matters were filed in case 05-9605, in Circuit Civil and in blind rotation assigned to Judge Holder as Judge Crenshaw refused to allow the cases to be enjoined just as Judge Sierra had refused to enjoin the Cases 02-4974 and 02-03812, as they stemmed from 01-15813 and 01-15814 continuing issues and all issues as incorporated and included herein. Plaintiffs states, this “non-membership”, “stalking or not stalking” and “rights of a father/citizen/honorable person” role or “RIGHT” was an element of “material fact” in the ruling of Judge Palomino in 2001, and known as “Rule of Law” by Former Judge/Attorney Scruggs and withheld as a “Right” from Townsend by sheriff deputies posing as Trustee’s, Attorneys, Judges and others of alleged Law enforcement and State Agencies and that himself, Denny admitted to Judge Arnold, January 2003, he was there representing “all members” being paid by people, agencies, Corporations who also owed a “DUTY” to all “General Membership” one of which is to Plaintiff Townsend and for those who Plaintiff Townsend speaks to stop the still ongoing Breach of Contract ad Breach of Trust and “misappropriation of their or the Corporate opportunity”, “abuse/battery” and “violations of law” and “rules of law” and as shown and proved now by transcripts and various other letters provided and filed as EXHIBITS in Complaints 02-03812, 02-4974, 05-911, 05-9605, and 06-6005, by threats of arrest/Jail for attempting to speak at the Church Business Meeting the fulfillment of the extortion with malice shows concealment of the rights to expose violations of Laws, By-Laws and contracts as fully stated herein and thus lead to the damages therefrom by these “associates”/

“officers”. These issues of material facts were not revealed until the June/July 2006, Production of FBCCP Business Meeting records which reveal truth of the allegations stated by Plaintiff Townsend since 1995 or before to the FBCCP and to the Courts.

(E) “(e) All members of the Church shall be entitled to vote in the Church business meetings---each member being entitled to one vote. Any member may make motions, or discuss motions, upon recognition of the Moderator. All motions from the floor, unless deemed necessary by the Moderator, must be referred to the proper committee for consideration and presented for action at the next business meeting.”

The June/July 2006 partial production of 1995-Present FBCCP Corporation requested records until revealed to Plaintiff Townsend could not and do not let Plaintiff Townsend as Individual or in all his positions illegally removed from in violation of frauds by the Schisms or the estranged wife could not (1) vote, (2) know what to vote on, (3) Be present to hear “Motions” of fraud of the Schism, Schism alleged “experts” brought in by the “Schism” for concealment of and or validation of Schism Motions” and or General Others from the “Floor” to Make Motions or ask questions (4) inform other how to be informed for their vote from this Plaintiff Townsend as the Officer of the positions as stated herein and concealment by the Schism is a violation of the BY-LAWS and violation of the rights of these plaintiffs as voting members and from the words of BECK the Moderator of the April 30, 2000, Business Meeting, deprive the Associate General Members from the reports they came to hear on “what Townsend had allegedly done in violation of civil or criminal law”, so to prevent Townsend from revealing the “findings” from the allegations made in the January 2000, Business Meeting and at other times in the faxes, letters, and verbal discussions as Beck said to Judge Palomino the “stack of papers” are “all lies” but now proved every point is truth.

Or due to “reckless” and “intentional” Breach of Duty”, “Breach of Contract” and violations of Law, by Attorney John A. Grant Jr. (as FBCCP Register Agent), and Attorney David Gibbs, III as FBCCP Corporation Attorney, Hillsborough Sheriffs Deputies, The Florida State Attorneys Offices, The State of Florida Department of Education, Deacons and/or others herein as “DOE” giving UNLAWFUL “Benefit of Clergy” and not responding to the Allegations by Plaintiff Townsend on or before April 30, 2000, to be present for the false testimony given to the General Voting Members by the collusion of Leatherman, Beck , Meister, Howlett, and Jeffers in the alleged true editing of the statements made by Plaintiff Townsend in the prior January 2000, Quarterly Business Meeting or multiple letters, subsequent statements or to allow Plaintiff Townsend to defend himself or be present when the attempted acts of fraud and slander were used by Beck and the Schism to “excommunicate” or “vote out” Plaintiff Townsend from the membership by illegal means in violations of BY-LAWS ARTICLE III. Section 7 (A)-(G) and said actions were unlawful per Florida Statutes process and also used as to cause fear and fraud to the General Voting Members as plaintiffs herein as these Schism members held Plaintiff Townsend across the street from the meeting in public disgrace and view and in violation of Plaintiff’s rights of “Notice of the Meeting” and Right to hear the accusations made against him and confront facts to false pretenses in violation of Fourth Amendment Rights and §617 F.S. and Civil Rights and BY-LAWS Rights.

Further, in the April 30, 2000, Business Meeting, Schism members did advise the General Voting Member of parts and information learned from the Janssen & Horgan C.P.A. auditor “findings” and that did then prove allegations Plaintiff Townsend

could have proved in said meeting as proofs of previous and current allegations and also addressed the April 30, 2000, knowing, intentional, reckless and negligent of Schism members in collusion even in said meeting to deprive the General Voting Members/Associates from illegally divesting themselves and other associates of “designated” funds and tuition’s previously given to the plans of the “Vision I” and now the newly presented “Vision III” now as a plan to abandon the “Sanctuary first” plan as presented April 16, 1996, to now the new plan of “Sports Complex” for the School as presented by CPCS Pastor/Principle Herman Meister.

The Schism and others knowing Plaintiff Townsend’s:

- A. Reputation, Integrity, Leadership, Experience and Growing Up in the Keystone Area since the Early 1960’s and reputation of the Townsend “Name” even as nephew of the Pastor of the Founding Church Odessa Baptist from back in the 1940’s, and
- B. prior statements to the Knowledge of Plaintiff Townsend in 1993, as to why these Deacons, (Bates, Rawls, Smith, Kerns,) and Former Retiring Pastor Dr. Harold Warner (even admitting to Randall Townsend “he felt safe retiring” because of Randy being in the leadership of the transition of the Church) and Officers and Pastor Dr. John Berry, Pastor Elbert Nasworthy and Pastor Bill Brown all approached, encouraged and by Church Vote at multiple times from or about 1994-current had elected Randall Townsend to the positions of leadership as LRPC Member and then elected Chairman by the LRPC Committee and Awana Commander and Nomination Committee Member, Sunday School Teacher, Soccer Coach, and multiple other positions and even as a Community leader and representative of FBCCP at multiple County Planning and Special Event Meetings being promoted as the Church Expert to

the General Voting Members, To the LRPC Committee and to the AD HOC Committee of Pastors Beck, Meister, Nasworthy, and Members Duane Milford, Robert Giles, Frank Edwards, and alleged Trustees Geoff Smith, Gary Leatherman and Joe Howlett and to the LRPC Committee and to Jack Bentley as the Realtor, stating to “not buy the Earl Property at 18015 N. Gunn Highway” and that the 18105 Gunn Highway property had “too many issues” and listed these issues as “entry way’s, Environmental Radon Testing, Lead Base and Lead Dust and Asbestos and EPC and SwiftMud, Timing and Costs and Community issues including traffic and the Keystone Park Civic Association and the Sierra Club and local residents in past years of fighting Hillsborough County Schools and Business and the State of Florida Department of Transportation from encroaching into the area ” and again at that time not promoting using or developing the 18105 N. Gunn Highway Property but rather expanding at 7705 Gunn Highway and currently at that time alleged the “permitting” would not be allowed as Plaintiff Townsend had previously warned even in the Fourth Quarter Business Meeting of July 28, 1996, page 6, and in the **LONG RANGE PLANNING COMMITTEE MEETING AGENDA FOR SUNDAY, JANUARY 5, 1997 AFTER EVENING SERVICE,** stating:

“...We must answer these questions before any steps can be started.

1. How many people do we need to seat in a worship service or school assembly?
2. How many students do we need to seat in a Sunday School by ages and room size?
3. BY school classroom?
4. BY Awana sessions?
5. How many people do we need to seat in a fellowship environment?
6. Do we need a gym?
7. With the above seating needs how many parking spaces are required?
8. What offices or management spaces are needed?
9. What spaces are needed for transition and greeting areas?”

Further, This Agenda was repeated by Ron Beck, by his written presentation in the “Hand OUT” to the Long Range Planning Committee on the agenda for Tuesday, October 28, 1997, stated:

“Responsibility of this Committee:

This committee is responsible for developing a Church Master Plot Plan and making necessary recommendations for additional facilities or existing facility changes.

Let’s break this down:

- 1. Develop a Church Master Plot Plan (should cover the next 3-10 years)...**
- 2. Make necessary Recommendations for Additional facilities....**
- 3. Make necessary Recommendations for Existing facility changes....”**

Further, Beck to called a Church wide special business Meeting to hire Carl

Doozan and the handout stated the following:

“Special Called Business Meeting for Sunday March 22, 1998,

Phase I Building Committee will bring a recommendation in our Special Called Business Meeting to bring Carl Doozan as our Phase I Architect.

The following information is what Carl will be doing for the building project.

1. Programming/Data Gathering- This will be primarily done by the church through the Long Range Planning Committee; consists of verbal description for each area of the ministry, space and equipment requirements, priorities, etc; information is then communicated to the Architect for clarification and evaluation.
2. Site Analysis-...
3. Graphic Interpretation of Program-...
4. Schematic Site Studies-...
5. Presentation drawing-...

Car Doozan Requires a Fee of \$7,500.00 for the planning services outlines above. An initial Payment of \$1,000.00 is requested with subsequent payments due as the work progresses. Printing and reproductions will be reimbursable.

For future budgeting, the architectural fees for design and construction drawings will range from 4% to 6% of construction costs depending on the scope of services rendered.”

- C. And per Pastors Ron Beck’s, Elbert Nasworthy’s and Randall Townsend’s as Chairman of the Long Range Planning Committee with approval of said and others statements and questions presented before the General Voting Members the General

Voting Members with the intentionally planned creation of the Phase One Committee and the planned and conspired departure of Randall Townsend by the SCHISM, the Business Meeting Records reveal the frauds, omissions of truthful disclosure, breach of trust, breach of contract and conspiracy of the Schism in the FBCCP Business Meetings of:

1. MARCH 24, 1996:

A. Announced in the Church Bulletin as follows:

“SPECIAL INFORMATION MEETING

Let me encourage you to be here this evening, not only for the preaching, but also for a “Special Informational” meeting we will be having after the service. The purpose for this meeting will be to inform the Church Family on two recommendations that will be voted on in a special called business meeting next Sunday evening, March 31st. Pastor Meister will be bringing a recommendation from the Steering & Building & Grounds Committees; and there will be a recommendation from the Long Range Planning Committee. We will not be conducting business at the meeting tonight, just giving our the information and taking questions and discussion on each recommendation. The actual vote will be taken in the Special called business meeting next Sunday evening, March 31st.

Please be in prayer each day this week as to how God would have you vote.

Sharing & Caring
Pastor”

B. The 18 page, HAND OUT OF THE INTRODUCTION TO COGAN

CONTRACT states in part as follows:

THE COGAN APPROACH

The Cogan Approach is a two-step process in which the following is to be accomplished:

STEP I

- A) A plot study and master plan, if necessary, for maximum land utilization.
- B) Space feasibility studies, as required for Christian education, worship, or fellowship, including present and future space requirement.
- C) Conceptual drawings, including floor plans, elevations and specifications.
- D) Contract governmental agencies regarding current code regulations pertinent to the development of conceptual drawings for the building.

- E) Financial feasibility study including analysis of historical data, projection of future needs and capabilities, and estimates of building budget and total project budget requirements.
- F) Assist in presenting the results of the preliminary studies and applying for approval from hierarchal persons or board.
- G) Negotiate arrangements for all necessary surveys describing the physical characteristics, soil reports and sub-surface investigations, legal limitations, utility locations, and a legal description; formal site development plans if required by government authorities. Our fee for this work will be 10 of each invoice.
- H) Provide all necessary construction cost estimating and value engineering services to price design options to obtain the most cost efficient structure in the design of an affordable facility.
- I) Provide a Firm Price for construction drawings as well as the actual construction itself.
- J) Facilitate the building committee review process.

STEP II...

WHAT OUR PHASE I ADDRESSES WITH YOU

- I.
 - A. WHAT ARE OUR CURRENT SPATIAL REQUIREMENTS?...
 - B. WHAT IS OUR HISTORICAL EXPERIENCE OF GROWTH?...
 - C. WHERE ARE OUR MISSION/MINISTRY EMPHASES?...
 - D. WHAT IS OUR CURRENT FINANCIAL PICTURE, SPECIFICALLY?
 - 1. Building Fund
 - 2. Undesignated Savings
 - 3. Designated Cash- on – hand
 - 4. Equity in Assets
 - 5. Debt and Liquidation Programs
 - 6. Operating Expense Requirements.
 - E. IF WE ARE ABLE TO BUILD, SHOULD WE?
 - F. IF WE DECIDE TO BUILD, HOW MUCH SHOULD IT COST?
- II.
 - A. WHAT IS OUR VISION FOR US IN RELATION TO ITEMS ABOVE?...
- III.
 - A. WHAT IS OUR PROJECTED INCOME POTENTIAL? FROM WHAT SOURCES?
 - B. WHAT FUNDING METHODS OR COMBINATIONS WILL WORK FOR US AND ARE CONSISTENT WITH OUR MISSION AND PHILOSOPHY?...
 - C. HOW MUCH WILL WE NEED TO RAISE? WHEN?
 - D. WHAT CAN WE AFFORD TO BUILD?
 - E. CAN WE ACTUALLY BUILD WHAT WE NEED? WHAT? WHEN?
 - F. HOW SOON CAN WE START AND WHEN CAN WE OCCUPY?
 - G. WHAT WILL WE BE ABLE TO BUILD?

1. Land usage.
2. Planning Board Rules.
3. Zoning.
4. Building Codes.
5. Permits
6. Highway/Street Departments.
7. EPA & Health Depts
8. Other Regulatory Agencies
9. Specifications
10. Engineering & Design
11. Assurances
12. Architectural Style
13. Participation by Us.
14. Water Management Agencies.

H. HOW WILL WE PRESENT/CONVINCE?

1. Hierarchy (if any)
2. Congregation
3. Funding Sources.

IV. DURING THIS PROCESS WE WILL ADDRESS ALL CONCERNS RELATED TO..

SUMMARY:

These items are addressed as the work is carried out by the Cogan Team in cooperation with the Church Leadership being served. The Church may be required to supply land surveys, drawings of existing buildings, etc. as well as basic financial data. The execution of PART I represents a commitment on the part of Cogan and the Church to Cogan Team concept to design and build a facility that meets the ministry needs of the Church as well as the budget which includes PART II.”

Plaintiff Townsend states that the above COGAN Document represents as “PROOF” for each General Voting Member (“Associate”), Pastor, Trustee, or other Officer or of any School Parent, or Government Agency, or Law Enforcement Officer specific rules, guidelines, Duties, Knowledge of said Duties, and shows Breach of said Duties by failure to act, or by “tort” or “negligent of duty” or “fraud” or “omissions of truthful disclosure” of said truthful data or facts and or “breach of trust” by violation of said reckless acts therein or proof of “appropriation or misappropriation of corporate opportunity” of said actions per the Duties listed in the Florida Statues stated herein and specifically of Florida Statues §617 and shows violations of Government, Government Officials and Agencies,

Law Enforcement and Courts and Attorneys to assist General Voting Members

(Associates) or these Plaintiffs who desire to be truthful and dutiful to the Constitutions, State Laws and FBCCP BY-LAWS as stated herein.

2. The transcript of the March 31, 1996, Business Meeting is as follows:

“Jerry Miller- Is this going to be a complete study for everything, sanctuary, education, growing, school?

Pastor Beck- Yes. Everything we can possibly do.

Ruth Gough-Is it still in our plans to buy additional property around the church?

Pastor Beck- We are always looking, and we have really been praying about the school across the street. We're praying the will go some place else and that would be perfect. It was a decision before I came, to keep our eyes on the lots in the back of the church. We have already gone out and asked out how much they would sell the property of the Day Care. Brother Windy Bennett, and a couple of lots next to our soccer field. None of these decisions will be made without taking to the Body.

Bill Schwab-Were there any other companies or any other way considered of doing this?

Pastor Nasworthy-Yes. The Long Range Planning Committee contacted the Florida Baptist Convention and their Architectural Department and had a meeting with Russell Hughes about a month ago. Randy Townsend had a meeting with him, and I was in part of that meeting also. We also contacted the Southern Baptist Convention and their Architectural Department up in Nashville. In both of those cases they were available to us, but they recommended a firm such as Cogan to come and to the type of study that needs to be done. The study part is the key thing right now. Those types of services are also available and their fee's would approximately be the same as Cogan's fee. The reason for Cogan is that they are local and they are at our disposal at any time. If we were dealing with someone from out of state or out of town, there could be delays in meeting and things.

Judy Hopkins-Are you saying they will tell us what they feel is best for us to do, and bring it back, and we may or may not decide to stay here?

Pastor Beck-The idea here is not for them to tell us what they think is best for us. When they get to the end of Phase One, they will tell us just what the county can let you do. Let's say they get to Phase One, and let's say, we do vote to have a sanctuary, to get it back off that four-lane highway, and the County said I am sorry you are only permitted to build a 600 seat auditorium. Well, there would not be wisdom in that. We have a 450 seat auditorium. Unless you build at least twice the size of what you already have, the authorities (whoever they are) tell us that is not right to do that. They will come with answers. Can you do it? They want us to do the best thing we can

do. The majority of those we will be working with are born again Christians in Cogan. The founder himself is born again Christian and also Dan Maddox. He and his quartet will be singing at our June 30 Patriotic Rally, loves the Lord; just a tremendous guy. I feel a confidence when I am working with Christians.

Gene Priddy - Cogan Industry is building a church over on Casey Road if you would like to see it.

Tammy Nunes – How many phases are there?

Pastor Nasworthy- Two phases. A step one to determine what your need is and the feasibility of it. Step two is actually developing that need, or that feasibility, into a building plan and getting it quoted and built.

Tammy Nunes-Adding to Bill Schwab’s question, did we look inside the church for people that do that kind of work?

Pastor Nasworthy- No

Pastor Beck- If there is somebody that does that type of work, please give us a call this week. We pretty much know most of the people in our church and don’t know of anybody that is in that type of situation

Frank Edwards- Will we be looking at demographics of the area and then overlaying those demographics against what our current property would hold and how will that have a bearing.

Pastor Nasworthy- Yes. Demographics will play into this. We can tell you the Hillsborough County Projection. We are in the fastest growing area of the County. There is not other area that is growing faster than this.

Len Zyki – Are they going to do that study also?

Pastor Nasworthy- They will make us aware of that information. When you say the word study, it means they are going to go out and actually do something on the street. They are going to generate the information for us and make the committee aware of it. If you do Phase One properly, you can determine from your past and previous years against your current year. You can start to project out with your demographics. You can project out , basically, what you anticipate you basic membership should be-all things equal, given a certain point of time in the future, and you will be plus or minus some percentage. They will be able to do that, yes.

Len Zyki- What does Phase One address?

Pastor Nasworthy- Look on you hand out at Roman numeral one and A,B,C and probably D. Yes, that has been done. The Long Range Planning Committee through the leadership of Randy Townsend as the chairman has assigned different areas of responsibility to different members, who have gone out and asked these questions. (This was done before Cogan was in mind and will be shared with Cogan.)

Lyn Zyki-?

Pastor Nasworthy-Right now I could not comment on it. It’s a work in progress. There are probable some things that we might say. “We all kne that,” and then there might be some other things that we will say, “Wow! I had know idea.” But it has not been correlated in one report yet.

Bill Sherman- So far, is there any other location that would be more favorable to relocating our ministry?

Pastor Nasworthy- There have been other pieces of property in Citrus Park area and in this part of the immediate county that have been identified as property, but not knowing what our total acreage deed (need) might be, there is nothing being homed in on. There is no certain piece of property out there that is said, that would be a great place to go. We know there is property out there just as you well know.

Pastor Beck- Some time ago I asked Pastor Nasworthy to touch base with several places that were for sale that we might get a ballpark figure as to how much it would be per acre, so he did that like for instance, off Van Dyke Road and some places off of Hutchinson, so we could have some idea what land might cost us. We are waiting for June settlement to know where we are financially and what we need to do.

Jim Kerns-What is the time frame for them to complete Phase One?

Pastor Nasworthy- They will go real rapidly. This process will go probably in a period of about two-months, may be three at the outside. They will know pretty quick. The reason they can; this committee has done a good job in preparing for this type of process with anybody, so they are really ahead of the game.

Pastor Beck- I asked that question myself and Dan stated, "We can go as quick as the church wants to go, or as slow as they want to go, to get through Phase One."

Jim Kerns- What kind of answer is that? You pay someone \$5,000.00, you want an answer quick.

Pastor Beck-Sometime working with Church, some of them say, "we do not want you to go too fast." Then they change their mind during mid stream on they want to do. He said, "We do it all. We work with your Committees and Pastors and facilities." He did not give; if takes one month it takes two months. "We work as fast as we can meet with your people." It depends on how quick we can get together with him. Like we said, we wish he could have been here tonight. He had another commitment tonight.

Gene Priddy- I believe it takes an expert opinion, and you pay for that.

Ed Hopkins- I believe we should get an expert opinion, but also I believe we should put this out to bid, because there is more than one company that can build a church. And I know you said we are not locked into this. There are some wonderful church building companies that some of us have experienced with.

Pastor Beck- Let me encourage you, Brother Ed, If you have some names and phone numbers that you could give our church office, so that we could contact those companies. Like we said we are not locked in this Phase Two with them. We are only contracting them to do Phase One. Somebody has to do that, and I have confidence that Cogan Industries can do a good job with that much like Brother Priddy said. And I appreciate him sharing that...."

Plaintiff Townsend states that despite this plan presented by Beck and Nasworthy to this

Plaintiff and to the General Voting Member never at any time was the written Report of Cogan Industries shown to Plaintiff Townsend as the Chairman of the Long Range Planning Committee nor was this plan shown to the General Voting Members or to the Phase One Committee during or up until September 8, 1999.

Plaintiff Townsend alleges that this Phase One Plan of Cogan Industries was held private by the Pastors and Schism to conceal “fraud” and “omissions” of the schism.

3. APRIL 14, 1996, PASTORS, COMMITTEE AND DEPARTMENT HEAD
AND GENERAL MEMBER MEETING WITH DAN MADDOX OF COGAN
INDUSTRIES—WHERE (30) PERSONS STATED THOUGHTS.

“Pastor Beck- Sanctuary improvements, Improve High School, Nursery, Stay at Current Site.

Gary Leatherman- Central Office, Better use of space/rooms, High school.

Donnie & Cyndi Beck - Sound Proof Choir, Larger Robe changing rooms, Welcome area, acoustical choir loft, multipurpose space 500 seat room.

Joe Gough- other property we have out grown

Jim Bates- Prioritize all wishing, more storage areas, *Double All! Size for growth. Sound addition for hearing impaired. Pay as we go by buying surrounding areas. Two multi service rooms.

Jim Kerns- School size stay as is due to traffic in & out. More property- feels church has plenty of space, school has crowded out space, *Proper fund raising.

Jim Leahy- All purpose fellowship hall for 500-600, Gym, High school, Sonshine Patch 1000 square foot room, 500 ft storage in center room for two audiences

Geoff Smith- *Stay at current site, buy property, *Single story building schools are hard to build 2-3 story, move sanctuary back.

Buddy Rawls-Natural Wood verses stucco, Shorter pews, Center door verses 2 side aisles in sanctuary, stay on property, school stay at 8th grade, treat 9-12th with proper dues if we do open if planned correctly, Pay as we GO, Auditorium 70% capacity now, central office, covered entryway drive through.

Jackie Howlett- Youth Gym, New water system, carpet on nursery, grow Fellowship hall, larger pantry

Bill Brown- 4 total open rooms after changes 9/1/96, Larger youth areas

Rick Holbin- Bigger stage in Auditorium, Stage Expansion area, Sound proof

all childrens rooms, intercom & video close circuit from church to Sonshine patch & Nursery.”

WITH REPEAT OR ADDITIONAL COMMENTS BY “Pat Smith, Lynn Zyki, Matt Powell, Paula Powell, David Powell, Mike Powell, Mary Pyle, Ruth Gough, Duane Milford, Myra Smith, Fred Rawls, Carolyn Rawls, Edna Shulke, Mark Nunes, Ed Hopkins, Dean Cockreal, and Randy Townsend,” now Plaintiff.

Further, Plaintiff Townsend states that each attendee heard and expressed themselves to Ron Beck as Senior Pastor and Dan Maddox of Cogan Industries and thereby put the Clergy and Professional representative on official notice of the direction of the General Voting Members and as the “charge” to the plans and directives to the LONG RANGE PLANNING COMMITTEE, pastors and trustees. Plaintiff Townsend states this is still the objective of this LRPC Chairman and that the actions of Ron Beck and the Schism has been to divert to themselves for their misappropriation of corporate opportunity, by their frauds and omissions of truthful disclosure against Randall Townsend and Plaintiffs herein.

4. APRIL 15, 1996, LETTER TO RON BECK, FROM RANDY TOWNSEND (4 pages) ON BEHALF OF THE LONG RANGE PLANNING COMMITTEE and points 1-7, and is Quoted herein.

- “1. The LRPC did approve the motion that the church allow us to hire Cogan for only Phase I.
2. The LRPC did approve that Duane Milford and Randy Townsend and Pastor’s Staff or a representative thereof, if desired, should review the Cogan Contract as attached, (Exhibit 1) and review the language of said agreement to determine our position of such an agreement.
3. I did inform Pastor Nasworthy of the LRPC motion as stated in Point 2 and we agreed a meeting woud be set up for us as the church committee to review these matters and then another

meeting would be had with Cogan prior to signing any document. We have not been contacted regarding our observations.

4. The contract as presented cannot be approved by the LRPC as printed.
5. Articles, II, III, IV, IX, XII, XIII, XXII, do not pertain to the scope of approval our church has agreed to pursue at said time.
6. Let me detail the parts of this contract that specifically deal with only phase I, that require our attention. This is so that there will be reduced communications problems that might occur in regards to our variations of said agreement and protection of our rights.

Article I.

- (a) Total sum of \$5,000.00. List of “certain studies” and “preliminary designs” and cost of same.
- (b) Who does Cogan report with? It has been presented to us and the church that Cogan will work with the LRPC and pastors, however the past trend has excluded the LRPC for all meetings except one.
 - (1) LRP Committee has partially completed.
 - (2) Same as above.
 - (3) Need to define.
 - (4) Committee could do this based on our data in hand. The “NO BUILD” concept will not require us to formally get an answer that might be so obvious, without exploring the ideas for growth that our committee has discussed.
- (c) We reserve the rights to all.
- (d) Who is this committee or group?
- (e) We need to define up front each contract and what group or committee will oversee these contracts. Dan Maddux on 1/25/96, waived the 10% over bill. We need waiver in writing.

Article V.

Need to clarify points of Art. I. In order to define Art. V. Should be done in advance of total agreement and payment.

Article VI.

Funds are available now however the account is not exclusively for this contract and should not be allowed as stated.

Article VII.

These “accuracy and completeness” issues needed to be clarified. Again who is to act as “owner” needs to be defined now.

Article VIII.

The \$5,000.00 was it to be paid in advance or as we reviewed in the 1/25/96, meeting the fee might be split?

Each of these payments need to be defined since we are only going part way at this time.

Article IX. Same as above in article VIII.

Article X.

Since only phase I is approved this article cannot remain as

stated.

Article XI.

What if we sub out technical experts of phase I. (Example: Jeff Smith, Bill Miles and others)

Article XII, XIII, XIV,

Okay.

Article XV.

“Perform all provisions” need to address and maybe change to read, “perform any”.

Article XVI.

Okay.

Article XVII.

Should be in affect during phase I.

Article XVIII, XIX

Should be maintained. Do we have current insurance for these issues or is additional coverage or riders necessary? If needed, how much will this cost?

Article XX

Okay with concept, but under new contract only during phase I.

Article XXI.

Okay.

Article XXII.

Cogan should be liable for work of phase I even if we elect other participants for phase I process or additional phase II or others.

Article XXIII.

Wording in principle is okay however we reserve the right to arbitration if amount of payment is due and we are holding payment while work is being completed. Cogan should save harmless OWNER while work is done.

Article XXIV.

Okay.

Article XXV.

If no to article II, what is and how would 8% be defined?

7. Let me explain that we are only trying to follow the guidelines of the Church by-laws and do our duty to same. In order to complete a master plot plan and be responsible to the church for the legal matters as it has been presented, we must be involved totally in this process. We cannot be ignored or kept in the dark about the issues that are involved this process if the church is to believe that we are accountable to them just as you or the pastor’s staff members may be.

We must be working with the same playbook. As noted several times in the contract, reference is made to the Cogan company gaining information from the board or church approved committee. We have now for several

months been trying to compile this information even before we met with Dan on 1/25/96. I must say that our attempts have not been supported by staff. Also it has been confusing for me to try to relate what I perceived had been our game plan from the meetings we have had in your office or walking the property and then Mr. Meister has a different view from a staff meeting or other conversations. The LRPC meeting is a time to iron out those issues but is hard to do when staff has not attended our meetings. From our position we are to be in this loop of information and to the church appear to be in the loop. I do not feel we are. I must also state that we do not have the cart before the horse in our data collection process per the opinion of many experts I have talked too per the Cogan process as stated in their contract reference to working with the committee. If we are to stay on the committee approved "Vision 2000" time chart as tentatively set at our 3/10/96 committee meeting and at our 3/18/96 meeting in your office, we must be more informed.

Pastor, this letter is not meant to stir strife or discord between us. I am only trying to do the job that God brings to my attention, and follow the by-laws. I am also trying to learn from the thousands of experiences that I have had in twenty years of business in developing conceptual ideas and seeing them to completion. I am also trying to learn from the many legal mistakes I have have to deal with. That is what marketing and selling is all about. If I do not understand why we are still not in total concert about this plan it is not because I am not trying to read the play book or not trying to listen to the counsel from the staff. There are many mixed signals being sent. I might add that the business or information meetings have not helped our church bodies perception but only hurt our committee's message to the church body.

As we agreed in your office on March 18, the powers of Satan will do anything they can to harm this process. I am trying to reduce that division to divide this body.

At the meeting on April 16, 1996, and by you and I speaking more often, maybe I can learn what role you really want our committee to play in this process. I must say that as I try to write the report due for the church quarterly business meeting, I can't say what I am just told to say. The report is to be a true perception of the committee. At this time our committee is really in the dark regarding the strategy of the Cogan process and the litigation issue.

Please, at your earliest convenience bring me up to date so I can know how to answer the people per the duties as the Chairman of the Long Range Planning Committee.

In Christ,
(SIGNED)

Randy Townsend

Exhibit One as attached are the comments of Duane Milford."

Plaintiff Townsend alleges this letter, highlights and exposes:

- A. The separation of the “schism” from the Long Range Committee
- B. The deceptions of the “schism” to the Long Range Committee
- C. The honorable motives of the Long Range Committee and this Chairman
- D. The motives of the “schism” as separate from the Long Range Committee
- E. The motives of the “schism” as separated from the “BY-LAWS”.
- F. The motives of the “schism” as separated from the “RIGHTS” of the “General Voting Members” as “Associates” per the Law and as the right to full “disclosure” under the Florida States and the “BY-LAWS”
- G. The motives and intention of Randall Townsend on September 8, 1999, to continue the investigation of alleged “pastors” and others by the “demands” of, “Show me the money” and “if you take these keys you are telling me you do not want the truth” as the Schism had acted to still conceal matters from Townsend and the General Voting Members and Townsend in his Committee and Church approved “Duties” and Elbert Nasworthy was no longer present to be held as the “scape goat” of misinformation.
- H. The enactment of the “Schism” “SCHEME” by the evidence produced in the June/July 2006, production of documents of the statements and presentations of the “SCHISM” MEMBERS on specifically, October 31, 1999 and April 30, 2000, and at other times as shown herein as to elevate the damages against Plaintiff Townsend, as confirmed by the Question of Defendant Karen Harrod Townsend to Judge Palomino, on November 15, 2001, as “WHAT DO I TELL THE PARENTS”, these “SCHISM” members were engaged and entrapped in their own

“scheme” and frauds due to the allegations of Plaintiff Townsend being and appearing “true” by the ruling in the Hillsborough County Zoning and Permitting Process and multiple Court Cases as stated herein and the “Schism” alleged Plaintiff Townsend was “dangerous” and a “liar” yet now after September 8, 1999, till the events using Judge Palomino, Plaintiff Townsend was none of the “slanderous” frauds as alleged by the “Schism” and the participation of Karen Harrod Townsend and others, even the deceptive actions of Scruggs..

5. MAY 20, 1996, LONG RANGE PLANNING COMMITTEE MEETING

6. JULY 28, 1996, Church QUARTERLY BUSINESS MEETING

“Pastor Beck-Any new business?”

Buddy Rawls-Any updates with the road project from Long Range Planning Committee.

Pastor Beck- I do not believe these is a report scheduled from them. I do not know if we have any more information than what we had till this point. Right now our information we are getting from our attorneys have been dealing with our mediation meeting and our court meeting that is coming up in the next few months here. I have not received any new information.

Buddy Rawls- Can we ask the chair of the Long Range Planning Committee?

Pastor Beck-If there is any new information, I would like to know it myself.

Randy Townsend-The last report of information we have had was back in May with a conversation I had with Lorena Ludovici. Her conversation with us could basically coincide with what is now forming a Mediation Team. That Mediation Team being able to dip into the real nuts and bolts, if you will, of our statement of what the Mediation Team will be preparing in forming our statement to the County Attorneys, as well as any type of posture that our Church Body would feel is appropriate in making those statements and being able to defend those positions. At this point, it is basically in the hands of the Mediation Team to deal with those areas. As far as Long Range planning, we have currently completed as many of the projects as we can at this point, and we are waiting for a couple of reports to get back to us, and then we can look at other issues that are coming about. We have prepared ourselves to take what ever direction we can and to this point, as I said, we have finished most of the reports that we can- other than a couple of internal reports; possibly as far as taking how many rooms there are on the property and dividing how many seats, chairs, and tables etc. will be able to be held and possible being able to put them into a cad system so that at any given moment we will know what any room can take and then what our total growth could be if we did not

do anything or if we then looked at what other type of potential this property could entail.

Pastor Beck-Do we have any questions regarding the Long Range Planning Report?

Joe Gough-Have you heard anything from the engineering company about changing the front of the building or anything? Do we know how much money we will have or will need? Are we just going into this thing trying to settle on a figure without anything in mind?

Pastor Beck- The architect that is working with our lawyers, have designed, if we went that route, a new front, and entrance to our building, if I understood your question. We have heard from them sometime ago. That was presented sometime ago. There is nothing new. We do not know if that is the wish of the Body to go that direction . We are not at a point to make a decision in our Body to decide if that is the way we want to go or not. Part of what the Long Range is doing is helping us to come to that conclusion, and the authority we are going to be giving to the mediation team, but not tonight. If you received your letter the answer to the second part of your question will be dealt within that Special Called Business Meeting. If there is a figure or a percentage or what authority shall we give the mediation team to represent this body. So rather that me try and answer it at this point , I cannot at this point, really answer that second part. If you want to see what it would look like to redo the front of this thing, if that is the route the Body would want to go, those drawings are already available. They have already been done. They have been done months ago. That is part of the case being drawn up because they have to have something to go on. They do not know if we want to redo the front, or tear down building, or build a new Sanctuary farther back. They do not know. They just know that they have to have a case by October 28 to go in defense of our Body. So they went with a total remodeling of the front-changing our entrances from the front to the sides and all that would entail. I am sure someone could give you a glimpse of those. Many in our Body have had a glimpse of those before. We have had the attorneys out here before, and we will be having them out here again, but, as you can see, we are trying to keep you as informed as we are about what is going on out here. Right now our direction obviously is mediation. That is where our emphasis needs to be right now and our prayers. What does God really want us to do?

Marie Wells-I do not understand. Didn't several months ago we hire someone to do a study?

Pastor Beck Cogan Industries.

Marie Wells- Is this who we are eluding to when you are explaining to him about...

Pastor Beck-No. Totally different entities. These are architects that are working with our lawyers who has to have some type of picture of what we suggest they might do after settlement, and they have to go with some type of idea or thought. Whether we do it or not is immaterial. The court does not care.

Marie Wells- What about the study?

Pastor Beck-Cogun Industries is on-going. They are working on that. The preliminary the feasibility study, on what we can do on this property, I have not received a recent report from them, but that is a different thing from this.

Marie Wells-I remember we voted about four months ago.

Pastor Beck – I am not sure. It was several months ago. It was June when we hired them. That is what Brother Nasworthy tells me.

Marie Wells- We must have voted at our last Business Meeting to hire the.

Pastor Beck-To hire them? Oh yes, that was voted on a passed by the Body.

It was voted on before we actually engaged them. We actually engaged them in June, and they came and had a meeting, open to anybody to share what they do in Phase One.

Marie Wells-I was just trying to get it straight in my mind which subject we were talking about.

Pastor Beck- They have not brought us a report. When they do we will share it with our Body.

(GAP IN TAPE and Townsend was told by Pastors tape was damaged.)

Randy Townsend-There are two pots going on right now; 1. What is the County saying? 2. What is our attorney countering what the County is saying.

That is operation number one. You can put it into perspective that there is another segment going on here. That is what we are doing with Cogan Industries. What we want to be able to do is to see where these two expert opinions will coincide with each other. What we are also prepared to say is they will not coincide, and the Church may have a whole different idea. Right now we as a committee and the Mediation Team, will really get into the find detail of what is the County's position? What is our attorney's counter to the County's position? The second issue, of what will matter is what Cogan Industries will come back and tell us, is irrelevant to what the County's statement and attorney's positions will be. **What we will do then is, before any step is taken, make sure that this Church Body gets full information on plans A, B, C, D, or how many other plans it entails.**

When I last talked to Dan Maddux, he understood that the County was taking their position and our attorneys were taking their position based on that expert data. We as a Long Range Committee have spoke with Lorena Ludovici. They agreed that they would share that expert data with us from that perspective. Then what we would be able to do is take what Dan Maddux will give to us. What we are then able to say is when Dan Maddux does his report he using totally independent thinking and creating in what he feels is best for this property. What we are not trying to do in this situation is second guess or out guess or push any particular direction on any particular person on trying to give us this information. Again, what we are trying to do with the form created was adding a collection report. That is we want everybody's input. **This is not a matter that one or two or three people need to choose what course of direction is for this case.** To answer the question, it is still very premature to know that Dan Maddux can finish his report, because at this point the County has not finished with what is going to happen out here in front of Gunn Highway, and there are still counters to fall there.

Pastor Beck- Does that help you out a little bit? It is not all real easy, but we certainly want to have the mind of Christ to continue here.”
 (GAP IN TAPE- Townsend was told by Pastors Tape was damaged.)

7. THIS JULY 28, 1996, BUSINESS MEETING REPORT ALSO SHOWS FINANCIAL DATA THAT AS YET THIS PLAINTIFF TOWNSEND HAS TO RECEIVE ANSWERS AS TO “SHOW ME THE MONEY?” AS REQUIRED FOR THE INVESTIGATION BY TOWNSEND WITH BY-LAW DUTIES AS A GENERAL MEMBER, CHAIRMAN OF THE LRPC CONDUCTING THE COGAN REPORT PROCESS AND AS A NOMINATIONS COMMITTEE MEMBER REVIEWING ALL “ETHICS”!

A. AS REPORTED ON THE JULY 1996-SEPT 1996 FIRST QUARTER REPORT:

(1) PAGE 12-15: “FIRST BAPTIST CHURCH OF CITRUS PARK FINANCIAL STATEMENT JULY 1996-SEPT 1996 FIRST QUARTER

BUDGET RECEIPTS	
REGULAR OFFERINGS	80,448.49
Miscellaneous Income	0.00
TOTAL BUDGET RECEIPTS	80,448.49
MISSION PERCENTAGE RECEIPTS	17,517.69...
MISSIONS	2,392.36
TOTAL MISSIONS	9,933.51
TOTAL SALARIES	62,907.64
PASTORAL MINISTRY	
Pastor Working Fund	79.50
Pastor Supply	192.72
Pastor Convention	182.56
Pastor Continuing Education	545.00
TOTAL PASTORAL MINISTRY	999.78...
TOTAL ASSOC. PASTOR MINISTRY	297.49...
TOTAL INSURANCE	2,161,82...
TOTAL MUSIC MINISTRY	1,140.12...
TOTAL YOUTH MINISTRY	1,947.32...
TOTAL EDUCATION & OUTREACH	2,751.55...
SUPPORT MINISTRY...	
Travel Expense	0.00
Casual Labor Office	0.00

Nursery Workers	0.00
Vehicle Lease	893.94
Other Expenses	0.03
TOTAL SUPPORT MINISTRY	5,821.06...
(2) PAGE 16-18:	
"CITRUS PARK CHRISTIAN SCHOOL	
BALANCE SHEET SEPTEMBER 1996:	
PETTY CASH:	200.00
CHECKING ACCOUNT	79,959.15
REGISTRATION 1996-97	60,959.50
BOOK FEES 1996-97	27,750.00
TUITION 1996-1997	4,739.43
BALANCE 1995-96	74,522.10
BALANCE 1994-95	16,626.59
SAVING INTEREST	30,102.12
	<hr/>
	\$294,858.89
TEACHER SUMMER SALARY	\$15,000.00

This Report By Townsend from the position of LRPC Chairman was to address the concerns of the LRPC, Milford and Rawls that Pastors were denying Chair as Townsend and the LRPC from the Mediation Team Process and to reinforce that the Pastors were not involved "per their duty" of all necessary functions to the BY-LAWS and Church operations. The LRPC and the Pastors and the Attorneys had reviewed the March 15, 1996, letter of Randy Townsend to the attorneys of Mr. Gaylord and Mrs. Ludovici and to attorney David Gibbs, III, announcing the position of the LRPC and of the Plaintiffs herein and these issues and supporting Case Laws were necessary information for, during and to secure the rights of the Plaintiffs herein in the course for any eminent domain action or settlement of said action.

8. THE POINTS OF THE MARCH 15, 1996, LETTER ARE AS FOLLOWS:

"POINT I.—IMPACT OF NOISE AND VIBRATIONS TO
SANCTUARY FOR WORSHIP

POINT II.—PROPERTY VALUES
POINT III.—ISSUES OF WHEN DAMAGES BEGAN AND HOW TO
CALCULATE.
POINT IV.—LINE OF SIGHT
POINT V.—SAFETY WALL AND TRAFFIC ACCIDENTS
POINT VI- FUTURE DAMAGES DURING FUND RAISING

Further these questions and actions were made by Buddy Rawls as a member of the Long Range Planning Committee so to show the General Voting Members the dissolution's of the Pastors to the Long Range Planning Committee and even by actions of Beck to not include Randy Townsend as the LRPC Chairman to the Mediation Team as the LRPC had intended from their recommendation to the Pastors. Further, it was the intentions of Plaintiff Townsend, Rawls, Bates and others that required that the "Together We Build" (TWB) Monies begin being reported weekly in the Church Bulletin and not just Quarter or when ever the Church Office remembered to report said funds, so on or about late 1996, TWB or the changed name to "Challenge to Build" (CTB) was reported weekly in the Bulletin and these numbers showed a pattern of non reported funds from the past.

Further, it was the intentions of Beck and Meister at later times to blame Elbert Nasworthy as Pastor Of Administration for failure to communicate to the LRPC but now known the infighting of the Pastors as Church verses School issues were at the root of keeping the LRPC and this CHAIRMAN of LRPC ignorant of what actions were produced in the April 30, 2000, Business Meeting to build the "sports area" even to the point of proceeding without "permits" or "zoning" approval as defiance by Meister and the CPCS School Board as quoted by Meister in the 2000 Business Meeting Minutes and by actions shown throughout 2006-2007, by the School Activities of Basketball, Volley Ball and other school functions using the "MAC"

Building at the 18105 Gunn Highway property despite in March 2006, being Denied in their Permit by Judge Barton and at previous times intending to violate the law, until they got caught as Meister alleged and as showing his lack of integrity, breach of contract, breach of trust and omissions of truthful disclosure and frauds in teaching the Children Plaintiffs to violate the law or that violating the law is okay until you get caught and then create new frauds to keep your violations ongoing and concealed. Further, in said Mediation Meeting, Beck and the Schism, did advise Townsend he was only a “guest” in said meetings and therefore his positions and questions did not have authority of the Mediation Team as Townsend was added to the Mediation Team after the Church had previously voted on the Mediation Team by a now proved A fraudulent act of the Schism even at that time starting the plan to devalue and misinform the LRPC Committee and misuse the LRPC in the scheme of frauds by the Schism”.

Further, in signing the Mediation Agreement, Townsend pointed out a loss to the FBCCP Corporation of \$27,479.00, due to the “haste” and “negligent” actions of Pastors and Trustees signing the Mediation Agreement before the Contract was reviewed verses the Mediation Funds accepted at the Mediation Conference. When Townsend addressed this matter to the Pastors and Trustees and Attorneys, during the first 30 days which protected rights of appeal, the Pastors and Trustee’s refused to pursue the obligations as stated by the LRPC and their Chairman, Plaintiff Townsend.

Further, the CITRUS PARK CHRISTIAN SCHOOL, NEWSLETTERS CONTAIN EVIDENCE OF PROOF OF ALL ALLEGATIONS OF PLAINTIFF TOWNSEND

SINCE 1996, DEFENDING THE FBCCP BY-LAWS AND CPCS MANUALS AND CORPORATION AND ASSOCIATE/MEMBER INTERESTS AND STATE:

A. SEPTEMBER 27, 2005, Contains and states:

“LAND USE HEARING

Please be in prayer concerning our request for a “Special Use” permit on our MAC building. A new hearing date has been set for Friday, October 7th. The judge has remanded it back to the “Land Use Appeals Board” (LUAB) for further review and determination. This is very critical because a new LUAB will be hearing the case and they may view it completely different than the previous one. We have retained a “Land Use” attorney to represent us at this hearing. We encourage you to contact our county commissioner, Jim Norman at (813) 272-5725 to notify him of the decision reversals we have received over the last 4 years.

DEDICATION SERVICE

You are cordially invited to join us for a special dedication service for our new MAC building Sunday, October 9th at 6:00PM. Pastor Ron Beck will be bring a message and dedicate the MAC center to the Lord. If you haven’t had an opportunity to visit, we invite you to join us on this celebratory occasion.”

B. “NOVEMBER 15, 2005

SPECIAL USE PERMIT UPDATE

First Baptist Church of Citrus Park voted to appeal the decision of the Land Use Appeals Board and will take the County to court on the advice of our attorney. The church has agreed not to exceed \$40,000.00 for this expense. Any contributions to this need would be helpful.”

C. “MARCH 14, 2006,

TRAFFIC CONTROL

For the past three weeks the sheriff’s office has been monitoring our dismissal procedures due to the numerous complaints by those in the neighborhood. The sheriff’s office required a meeting with the administration and gave them their findings and possible solutions. From this time forward, violators may be ticketed for “obstructing a right of way.” Also, please do NOT park across the street and walk your child in or let them cross the street by themselves; this presents a very dangerous situation. ALL parents MUST follow our prescribed procedure for unloading and loading students.”

D. “APRIL 25, 2006,

A LETTER FROM OUR PASTOR...

Dear Parents,

I want to thank all of you who have been praying for the property issues we have been going through as a ministry. On March 28, 2006, Judge Barton issued an order denying our request for a Special Use Permit for our new property. Although we

were disappointed in his decision we are comforted that God is in control. Our church family will be meeting to discuss the options that we have. The options we see at this point are as follows:

1. We could appeal the decision, but this would be difficult and costly.
2. We could re-apply for a Special Use Permit.
3. We could continue to operate on both campuses holding our classes on this campus and developing our school sports programs and other church ministries on the new property.

We appreciate your prayer for wisdom as our church family considers these options. Whichever path we take, I want you to know as a school family that we are committed to continuing our school ministry, "Teaching Every Subject in the Light of God's Word." We are very excited about what God has for us in the upcoming school year here at CPCS.

Sharing & Caring
Pastor Beck"

Further these records of Credit Card Statements of Beck and Church Business

Meetings of June/July 2006, show:

- A. Conspiracy, Breach of Duty, Breach of Trust, Fraud and Omissions of Truthful Disclosure and "misappropriation of corporate opportunity" by the Schism.
- B. Conspiracy and Fraud to allege that the violations of the BY-LAWS and of the COGAN plan was due to the incompetence or failure of Elbert Nasworthy allegedly acting alone as the Pastor of Administration, but shows collusion and frauds and omissions of truthful disclosure by the Schism desiring to make "Nasworthy" the "scapegoat" and allowing the Schism to continue the "mask" on their true actions and intended plan as shown herein.
- C. Show and prove why Plaintiff Townsend was required to object to the violations of law and BY-LAWS and of the Cogan Plan.
- D. Show and prove why Beck and the Schism began the Phase One Committee to override and breach the duty of the LRPC and this CHAIRMAN now Plaintiff Townsend and to appoint Geoff Smith as Chair of the AD HOC. Phase One

Committee which side stepped the Rules and INTENT of the BY-LAWS and concealed actions of the Schism buying time by blaming Nasworthy as these same issues continue and occurred during the tenure of Bill Brown as Pastor of Administration and Townsend sought to confront these issues on September 8, 1999, through current times and Gary Leatherman alleged he was being “deceived” by Pastors of the “secret accounts” and therefore needed his time to investigate with Townsend.

E. Show and prove why Plaintiff Townsend was required to be “excommunicated” “slandered” and “violated of his Constitution and Contract RIGHTS’ and the deviant plan of the “Schism” and others to violate the laws and BY-LAWS and rights of Plaintiffs as stated herein.

Further the letters from Beck placed as exhibits in the case files show violations of duty and fraud and omissions of truthful disclosure by Beck and others verses the actions as done in the April 30, 2000, and other Business Meetings.

(F) “(f) All business meetings shall follow an agenda. All committee reports at the quarterly meetings shall be in written form in addition to the oral reports. All new business for consideration will appear on the agenda of the business reports.”

The June/July 2006, partially produced documents confirm violations of said point (f), as written reports are missing and new business is not reported legally to this Plaintiff so to address all matters per Plaintiffs duty as defined in 1993- to 1999, in his official roles until the omissions of truthful disclosures of the estranged with and pastors and deputies as trustees began and then is continued and assisted by attorneys Gardner, Gibbs, Grant, Scruggs, Gray, Denny, Turmel, and judges still refusing to grant “Discovery” and by others.

- (G) “Article VI Sec. 4. Amendments, This Constitution may be altered... provided that proper notice has been given...and provided also that such proposed changes have been submitted...but final action is subject to the vote of the Church...”

And Plaintiff Townsend states that the partial production of the June/July 2006, confirm violations of this clause herein and violations of Plaintiff Townsends and others rights to knowledge, and thought and vote were done illegally and as breach.

- (H) “Article II, Sec. 2., When any member of the Board of Directors (Trustee) is unable to carry out the business to which the church has called him, he shall be replaced by temporary appointment by the pastor. A replacement shall be elected at the next regular business meeting and he shall serve until the end of the three year term.”

Plaintiff alleges upon review of the partial June/July 2006, FBCCP Documents that this Section 2., has been violated by intentional, negligent, reckless and knowingly conspiring actions of the pastor acting as alleged Clergy and alleged trustees unlawfully masked as “Officers” acting per the duties of FBCCP BY-LAWS and F.S. 617, and of Sheriff Deputies and violating the rights of members as these Plaintiffs to know, address and vote per the BY-LAWS to confirm the true Trustee Officers timely upon knowledge in September 1999, of all prior and still ongoing frauds and omissions of truthful disclosure by actions of these alleged pastors and trustees and attorneys and judges and others in agencies as all defendants herein to obstruct the rights of Plaintiff Townsend to require all Pastors and trustees to “carry our the business to which the church has called him” or then be “elected” upon revelation to the voting members of truthful conduct or violations of breach of conduct of the BY-LAWS, Contracts and Laws by whom and for whom they allegedly serve only to protect the frauds and omissions of truthful disclosure of pastors and themselves.

- (I) “Article II, Sec. 3. The Board of Directors shall hold its election of officers (president, vice-president, secretary) immediately following the business meeting in which the members were elected.”

Plaintiff Townsend alleges that **no** produced documents show that elections of these Trustee's were done and that this Plaintiff has been denied his right to vote or his right to oppose the appointment of any Trustee and thereby no actions by the trustees are within the BY-LAWS or STATE LAWS and Violate the Contract of the BY-LAWS and therefore any and all actions of the TRUSTEE's are violations of the BY-LAWS, BREACH OF DUTY, and FRAUDS TO THE CORPORATION MEMBERS and thereby all joint tortfeasor to assisting the frauds and breach of the TRUSTEE's hold a duty to "make whole" or "reimburse" these Plaintiffs due to the collusion, fraud and omissions of truthful disclosure and violations against these Plaintiffs and Plaintiffs have been damaged by these violations of these alleged "Trustee's" and "pastors" and others doing illegal actions as of Section 4, Article II and others as ARTICLE I, SECTION 4. And ARTICLE III, SECTION 7, (A)-(G), has been intentionally, knowingly, recklessly and negligently done in order for pastors and trustees to continue their fraudulent acts against plaintiffs assisted by others including actions specifically against ARTICLE III, SECTION 7, (G), to violate "family members." As tools of the alleged trustees and pastors and others illegal acts as said herein to conceal frauds against plaintiffs and prevented Plaintiff Townsend from his right to MOTIONS per section "ARTICLE IV Sec. 1. The Pastor... Termination may be either at the pleasure of the Pastor or the Church..." but actions by sheriff deputies acting as illegal trustees in violations of "Article IV. Section 4. TRUSTEES... upon officially recorded instructions of the Church in conference..." prevent still this Plaintiff Townsend from attending any meeting and voicing and voting his rights or the rights of these minor plaintiffs.

(J) Per “CHURCH POLICIES ... I. DENOMINATIONAL POLICY” section C. it

states:

“At no time shall this Church be under the control or jurisdiction of any separate organization or body, ecclesiastical or otherwise, but shall remain completely independent and autonomous in the government of its own affairs. The extent of support and to and cooperation with any organization outside this local Church shall be at the will and pleasure of this Church.”

Plaintiff Townsend states that by the willful acts of Beck, Meister, Howlett and Karen Harrod Townsend as members, and in their alleged official honorable dutiful positions herein acting by their now proved fraudulent acts and Beck and Karen Harrod Townsend’s own testimony made under oath now proved fraudulent written affidavits and under oath now proved fraudulent verbal testimony to the Courts that these showed:

- (1) a willful breach of contract and breach of trust (FBCCP BY-LAWS and Marriage) violations and the “willful and pleasure of the Church” BY-LAW’S clause intentions and got by fraud approval to involve by fraud and omissions of truthful disclosure and false slander and unlawful allegations against Randall Townsend just so he could not be present at Business Meetings or Daily School and Church functions or be in the daily lives of Plaintiff’s Children to rebuke these now proved false accusations
- (2) and to involve Sheriff Deputies, State Officials, and these Courts in the Church and School matters by frauds and bar this Plaintiff Townsend as first charged dangerous/RESPONDENT to civil and criminal charges and by other allegations demanded from his paid and contractual attorneys full disclosure and still respectfully requests full disclosure per the legal process as first started by Schism members and attorneys and judges, this continues the Schisms frauds and denies the General Voting Member their BY-LAWS Rights to full and fair, honest reporting of all matters while, before

or during discussion and voting of all matters of Church and School Business. And thereby withholding the truthful and honest opinions, reports and advise that this Nominations Committee Member, Awana Commander, Long Range Planning Committee Member, Usher and multiple other positions General Voting Member and Officer Randall Townsend intended to be told to the General Voting Member prior to a "VOTE" then these actions impede the obligation of the BY-LAWS as a contract.

- (K) "ARTICLE IV (Organization) Sec. 2. Other staff members ... Specific duties (Job Description) of all paid staff members shall be kept on file in the Church office and available to all Church members upon request."

Plaintiff Townsend even September 7, 2006, has made multiple request of employee records that have since the 1990's has been denied. Especially necessary now when the issues of August-October 1999, and thereafter from the just produced June/July 2006 records shows additional self dealing, frauds and embezzlement by Officers.

- (L) "ARTICLE IV (Organization) Sec. 3. Deacons... The Deacons are charged to constantly seek out men who may meet the New Testament qualifications for Deacon and present those who do to the Nominating Committee for Church approval."

Plaintiff Townsend alleges that this process was avoided at multiple times in the process of electing Deacons so the "Schism" could find men that solely met their objectives and this bypassed the Nomination Committee already attending to and aware of the prejudice being created by the Pastors bypassing the BY-Law system.

60. Plaintiff states **per Florida Statute 617.0834** the following actions remove the Civil Immunity liability of any officer or director of the NOT FOR PROFIT Corporation and can be used to show "BREACH OF DUTY" per:

- A. §617.0834(1)(a)** stating, "The officer or director breached or failed to perform his or her duties as an officer or director; and

- B.** **§617.0834 (1)(b)1.** The Violations of Standards of “Criminal Law” or “Civil Law” can be used to show “BREACH OF DUTY” per violation of:
- C.** the Internal Revenue Tax Law Violations can be grounds for “Breach”
- D.** Labor Law Violations can be grounds for “Breach”
- E.** Acts of Negligence and Intentional Misconduct can be grounds for “Breach”
- F.** Fraud and Omissions of Truthful Disclosure can be grounds for “Breach”
- G.** False Testimony in an Affidavit or Court and Perjury can be Grounds for “Breach”
- H.** Proof of Child Neglect or Child Abuse or Interference with Child Custody, or Child Endangerment can be Grounds for “Breach”
- I.** Proof of violations of FBCCP BY-LAWS of appointments and illegal voting of FBCCP Corporation officers and FBCCP Trustees not being confirmed by election of the Nominations Committee or confirmed by the “vote” every three years per the FBCCP BY-LAWS and these illegal acts of FBCCP Trustees actions in violations of the FBCCP BY-LAWS and Sheriff Deputies Policies and practices in conspiracy to give “Benefit to Clergy” actions in violations of the FBCCP BY-LAWS and Laws of these UNITED STATES, STATE OF FLORIDA, HILLSBOROUGH COUNTY CIVIC LAWS, CRIMINAL LAWS, LABOR LAWS, BUILDING CODE LAWS and FRAUDS AND OMISSIONS OF TRUTHFUL DISCLOSURE TO THE GENERAL VOTING MEMBER can be “Breach” of the FBCCP and Constitutional Law.
- J.** Proof of Credit Card “theft” and misuse of designated funds can be as “Breach”
- K.** Proof of any and all violations of Florida Statues §895, as this Statue is also within the “Duty” of the Attorney General and State Law Enforcement (FDLE) to investigate and prosecute violators for the protection of all citizens.

L. Proof of NOT ACTING IN GOOD FAITH per **617.0830(3)** stating, “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.” Subsection (2) states, “In discharging his or her duties, a director may rely on information, opinions, reports, or statements, including financial statements and other financial data if prepared or presented by: (a) One or more officers or employees of the corporation whom the director reasonably believes to be reliable and competent in the matters presented;...”

Plaintiff Townsend presented the “Pastors Schism” and the LRPC and the Corporation Attorneys, Eminent Domain Consultants, County Planners and select General Members and the Consultants hired by the Corporation as CARL DOOZAN of Carl Doozan and Associates and DAN MADDOX of COGAN Industries with reports that conflicted with the “VISION II” of the “Pastors Schism” and thus this required the Pastors Schism II to show “bad faith” actions and create deceptive frauds and omissions of truthful disclosure in order to carry out the “VISION II” plan that still after over 9 years and several Court rulings by Judges Arnold and Judge Barton show that the RULINGS by Plaintiff Townsend were “reasonable” and “good faith” Dutiful actions as should have been done by the “Pastors Schism II” rather than the “Pastors Schism II” continuing to hire “hired GUNS” as consultants, lawyers or themselves to do frauds to the General Voting Members, the Hillsborough County Zoning Department, the Community within which they planned to live and operate as a TRUTHFUL HONORABLE CHURCH or to the Courts but still continue the frauds by the COERCION and DECEPTIONS of Attorney Denny as JUST ANOTHER “HIRED GUN” OF THE “PASTORS SCHISMS” keeping this General Member from practicing Plaintiff’s RIGHTS and DUTY per Florida

Statutes, 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);

M. 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 v. DOE** 814 So2d 347 (Fla. SCt. SC01-179) March 14, 2002, and multiple other cases as stated herein.

N. Proof of Incompetent, or False, or Bad Faith Reports from Experts, (Legal or Architects) used by the "Pastors Schism" as Officers to conduct the Deceptions of the Courts and Deceptions of the GENERAL VOTING CONGREGATIONAL MEMBER can be proof for "Breach of Duty" and proof of damages and restitution for said damages. The Use of the overruled D.C.A. **MALICKI** case by Attorney Denny in violation of the standards required by the Duties of an attorney practicing in the Second District Court of Appeals per the **FLORIDA APPELLATE PRACTICE AND ADVOCACY** Book 3rd Edition, affirms that the duty of the attorney is to cite proper case law and should the cited law change it is the duty and good faith of the attorney to act and inform the court and Plaintiff states that Judge Marva Crenshaw knowingly, intentionally, recklessly and negligently omitted truthful disclosure and participated in the misuse of the **MALICKI** DCA case in opposition to the Florida State Supreme Court Rulings overturning the DCA **MALICKI** standards and process to aid and assist and conspire with Attorney Denny and Defendants herein to conceal all actions of Defendants by her **ORDERS** as show herein.

Plaintiff states that Attorney Denny since before presenting the **MALICKI** DCA case to the Courts in January 2003, was aware or should have been aware that his “argument and position” to the court was of the D.C.A. opinion reported in Florida Law Weekly and had been overruled by the Florida Supreme Court in March 2002, also reported in Florida Law Weekly and any proper search of legal systems shows the Supreme Court Case was fully published prior to all arguments by Denny in January 2003, or by the admission of Judge Crenshaw in her **ORDER** of September 2003. Plaintiff Townsend alleges that Denny was completely knowledgeable of his acts and even the Honorable Judge Arnold on January 21, 2003, objected in part to the argument of Attorney Denny, but Attorney Denny with knowledge that the Case was overruled proceeded to misinform the court and the Honorable Marva Crenshaw trying to allege protections of the D.C.A. Court ruling to “EXCLUDE” these FBCCP BY-LAWS in “full”. The **MALICKI** cases both D.C.A and Florida Supreme Court however still show the BY-LAWS were used as the tool of the court to determine the “alleged tortious conduct of the Church Defendants.” And the Court specifically held that “To hold otherwise and immunize the Church Defendants from suit could risk placing religious institutions in a preferred position over secular institutions, a concept both foreign and hostile to the First Amendment.” Pages 364-365. By attorney Denny intentionally, knowingly, recklessly and negligently continuing fraud upon the court and this Plaintiff Pro Se Randall Townsend know just known per the production of the COURT ORDERED FBCCP Corporation Records in June 2006, delaying omissions of truthful disclosure and conducting frauds against the court and his own client this Plaintiff as a General Member, all statute of limitations have yet to expire due to the continuation of the concealment of facts from this General Member still on

September 7, 2006, showing to court of Judge Crenshaw by MOTIONS and verbal testimony that “discovery” of FBCCP records is still needed for this Plaintiff and General Member with rights of discovery of all FBCCP documents.

O. Further, the Misuse of the **DOE v. EVANS** 718 So2d 286 (Fla. 4th DCA 1998) continued and allowed and promoted the injurious falsehoods by the “pastors schisms” to the General Voting Members and to the Courts and Plaintiffs, Plaintiff’s family, and all Defendants relied on the intentionally false and deceptive position of attorney Gardner, Gibbs III, Grant Jr., Denny, Scruggs and Gray and or other attorneys not yet known to this Plaintiff who attempted fraud during the Zoning or Ordinance Hearing and trials and Appeals regarding the 18105 Gunn Highway site in conspiracy to do fraud to protect their own tort acts of malfeasance and breach of duty and continued and promoted the frauds of Beck, Meister, Howlett, Jeffers and others of the FBCCP membership and others.

61. Plaintiff states per Florida Statues 617.0206 Changes in the By-Laws were not done per the BY-LAWS “DUE PROCESS” as now known from the Production of the BUSINESS MEETING MINUTES of July 2, 2000, and show intent to conceal activities already done for the protection of the offenders as Plaintiff was reporting issues that these Pastor Schism members used to fake the appearance of “no Wrongdoing.” Plaintiff states that the intentional acts by the Schism were illegal and violations of the BY-LAWS to block this Plaintiff from speaking to the issues before the General Congregation VOTE to approve these “Revisions” and denying Plaintiff the RIGHT TO VOTE on these BY-LAWS and as per **Florida Statue laws and ASSOCIATIONS AND NON PROFIT CORPORATIONS RULES §71**

A. Florida Statue 617.0304(3) states:

“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.

- 1. “§71:30 Checklist—Matters to be considered in actions involving Churches or religious societies generally**
- 2. 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.”**
- 3. §71:30 Should review (1) Status of Church (2) Facts showing liability of church (3) Facts showing liability of church leaders or members**
- 4. 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.”**
- 5. §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”**
- 6. §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 in the Sheriff Deputy issued vehicles and at times even using the “lights” or by Ron Beck, Individual, with visiting Evangelists in town in the vehicle with Ron Beck so to present Plaintiff Townsend as an alleged “crazy person” and “stalker” to this visiting Evangelist and others including Pastors

at other Churches, to keep Plaintiff Townsend away from the FBCCP or CPCS public meetings or functions even as a parent of CPCS students with rights, 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 frauds the still naïve General Voting Members. Concealment still of FBCCP Corporation Records properly requested per the ruling of the court of Judge Marva Crenshaw was continued and concealed still by the unlawful Oral ruling of September 7, 2006, of Judge Crenshaw done on the hearings for Discovery in the September 7, 2006, Case Management Conference in case 02-03812.

7. “§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 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 to J.D.T. even to witness his father being subjected to this humiliation and slanderous injurious falsehoods by Beck, Howlett, Shumate and Leatherman on the front steps of the Church. Transcript testimony, Notes, and Letters to Beck and from Beck and only now to compare to the Business Meeting minutes to confirm events show the conduct violated the process or expulsion of this member Plaintiff Townsend was unlawful per the BY-LAWS ARTICLE III Section 7, (A)-(G).

8. “§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, assented 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)

9. 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.”

10. §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 Defendants Denny, Scruggs, Gray or Judge Crenshaw and others listed in the Complaint as Defendant individuals, or agencies herein have tried fraud and omissions of truthful disclosure and per PELLEGRINI v. Winter 476 So2d 1363 (Fla. 5th DCA 1985) and per WILLIS v. FOWLER 102 Fla. 35, 136 So. 358 (1931) this is cause for an action based on fraud as Defendant misrepresented facts to validate his or her opinion when this attorney and Judge held a position of superior knowledge and fiduciary or confidential capacity has the duty to make a good-faith full disclosure and Defendants by trick or artifice prevented plaintiff from making inquiry into facts per Travelodge Intern. Inc. v. Eastern Inn 382 So2d 789 (Fla. 1st DCA 1980) and this misrepresentation caused additional damages as lost precious relations and financial damages as stated herein and shows proof that all

Defendants have been joint tortfeasor to the continuing damages of the Malicious Prosecution and now for years not allow plaintiffs to defend themselves due to frauds of attorneys and judges allegedly advising truth and not using fraud as false evidence as in the case of Lloyd v. Hines 474 So2d 376 (Fla. 1st DCA 1985).

62. Plaintiff states that PER THE FLORIDA STATUES ALL Plaintiff had 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 in the civil cases and the multiple “hired guns” used as manuevers by the Clergy and alleged officially voted in trustees masked as Sheriff Deputies and lawyers reinforcing the continuing frauds show “recklessness of duty” and intentional conspiracy to defraud Plaintiffs as Plaintiff incorporates herein all MOTIONS of 2006, presented to the Court of Judge Marva Crenshaw in case 02-03812, to present facts to block the MOTIONS FOR SUMMARY JUDGEMENT attempted by the Court to continue the concealment of criminal acts and frauds and joint tortfeasors violations of Plaintiffs.
63. Plaintiff alleges that the Pastors Schism I & II knew Plaintiff could have proved “Recklessness of Duty” and “Breach of Duty” and “Frauds” On September 8, 1999, if Howlett was not as a “Rambo” Trustee/Sheriff Deputy covering his own criminal, recklessness breach of duty to both “uniforms” as violated that day by the Schisms.
64. Plaintiff alleges that the actions and frauds 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 THESE PLAINTIFFS AS HIS CLIENTS TRYING TO PROTECT SCRUGGS, as an individual violating his DUTIES and “color of uniform” as an Attorney and Officer of the Courts to protect and conceal his “PERSONAL CONVICTIONS NOT TO MAKE A CHURCH LOOK BAD” BUT BY GIVING ‘BENEFIT TO CLERGY” AND CONCEALMENT OF THE FRAUDS OF RON BECK, HIMSELF AND OTHERS ACTING OUTSIDE THE LAWS OF THIS STATE THE COVER UP AND MAKES THE FRAUDS, OMISSIONS OF TRUTHFUL DISCLOSURE AND DAMAGES BY THE PASTORS SCHISM GREATER AND LONGER.

65. THESE ACTIONS ALSO DERIVE FROM THE INTENTIONAL, RECKLESS, UNLAWFUL ACTS OF GARDNER, GIBBS III, GRANT, JR. AND DENNY, IV, AS FIRM ATTORNEYS FOR DEFENDANT RON BECK, Individual, RON BECK AS PASTOR KNOWINGLY, INTENTIONALLY, RECKLESSLY AND NEGLIGENTLY ALLOWING UNLAWFUL “BENEFIT OF CLERGY” AND MISREPRESENTATIONS OF LAW TO DEFENDANT DENNY’S OTHER CLIENTS INCLUDING THIS PLAINTIFF THAT THE COURT HAS NO JURISDICTION TO ENFORCE THE BY-LAWS CONTRACTUAL RIGHTS OF THE FBCCP CORPORATION AND DID WITH THE “PASTORS SCHISMS I & II” CONSPIRE, CONCEAL AND OMIT TRUTHFUL DISCLOSURE 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.

66. Plaintiff Townsend alleges Defendant Karen Harrod Townsend on or about October 10, 1999, in the kitchen of the marital residence at 18005 Lindawoods Street, did state to Plaintiff Townsend, “How can you be so right and these six men be so wrong?” as a direct cause and affect of the influence of the pastoral counseling, employer counseling, and marital counseling received from Defendants Beck, Meister, Leatherman and Brown and as the counseling was fraud, omissions of truthful disclosure, illegal legal advice and counseling and tort interference with a marital contract and a breach of duty and a breach of privacy done intentionally, knowingly, willingly, recklessly and negligently to induce the Defendant Karen Harrod Townsend to act in extortion and conspiracy to conceal the fraud, embezzlement and conspiracy of FBCCP pastors and alleged trustees and as Deputies and as individuals and with this influence Defendant Karen Harrod Townsend did allege and state that Plaintiff Townsend was a “liar” and thereby pledged her allegiance, support, cooperation and actions to her employer and her supervisors in opposition to Plaintiff Townsend acting per his duty to the Marriage Contract, the FBCCP BY-LAWS and to the Laws of this State of Florida and the United States.

67. Each individual by their training or by their own personal decision to breach their DUTY to honor the obligations and rights of the United States Constitution, State of Florida Constitution, and breach the rights and obligations to a Binding Legal Contract(s) or violate and breach their duty to their employer or Duty as a member of FBCCP to intentionally, knowingly and recklessly and negligently violate the FBCCP

Constitution and BY-LAWS or Constitutions or Marriage Contract as stated herein become joint tortfeasor's with and to the actions of the "Pastors Schism" and give "benefit to clergy" to knowingly, intentionally, recklessly and negligently violate the Constitutions and Rights of these Plaintiffs.

68. Plaintiffs alleges that all actions by Defendants as Pastors Schism I & II, caused on September 8, 1999, and still continuing in 2006, were and are intentional malicious retaliations against all Plaintiffs to give "Benefit to Clergy" to prevent Plaintiff Randall Townsend per his DUTY to the Corporation and to his family from exposing unlawful violations by the Pastors Schism I & II, and the estranged wife of the FBCCP Corporation BY-LAWS, CRIMINAL LAWS, CIVIL LAWS, LABOR LAWS AND INTERNAL REVENUE LAWS AND FRAUDS OF MISUSE OF CORPORATION ASSETS AND FRAUD ABOUT THE MASTER BUILDING PROGRAM AND FRAUD AND OMISSIONS OF TRUTHFUL DISCLOSURE OF THE ACTIONS BY RON BECK, INDIVIDUAL, OF THEFT OF CORPORATION FUNDS ON HIS CORPORATION CREDIT CARD AND THEFT OF THE AWANA CHILDREN MICROPHONE AND ACTIONS OF TORTS AND NEGLIGENCE AND ABUSE OF CHILDREN AND OTHERS IN THE CARE AND MANAGEMENT OF THE PASTORS AND THE TRUSTEES AND THAT EXPOSURE OF: (1) The Master Building Plan "Vision II & III" frauds was for a personal "benefit" started only for the personal gain for "benefit of Clergy" Ron Beck, as individual, as 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. Beck and the Pastors knew 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. Beck and Meister knew the 18105 Gunn Highway property is the middle of the watershed and Beck wanted a new parsonage for his family and more bathroom space due to his three daughters and is fully knowing per the warning of Plaintiff Townsend prior to the purchase of the new 18105 North Gunn Highway property the problems of the project and that purchasing the new property would delay other necessary projects needed for the immediate needs of the ministry as a whole but Beck created the AD HOC Committee as “Schism Plan II” to divest rights and warnings of the LRPC and this LRPC Chairman as this Plaintiff. Beck refused Plaintiff Randall Townsend’s reasoning to sit face to face with the community and county leaders and other interested parties and get their approval for the full project before FBCCP bought the land just so Beck could gain control of a new parsonage as the “Earl Home” at 18105 North Gunn Highway just so his “daughters could have more bathroom space” and “he (Ron Beck) always wanted to live in the country” and thereby intentionally created in 1997 the “VISION II” and allegedly per the Plea of Herman Meister in the Special Called Business Meeting to obtain the vote to buy the property used “all” the Designated Building Fund Moneys gained from the Eminent Domain Settlement and “old school closed accounts” and ignored this LRPC Chairman and LRPC Committee Rights and the 1996 Rights even Ron Beck as Pastor willingly granted to the General Voting Members that they would have “Final Voting Rights” after being legally presented with ALL Findings and Proposed OPTIONS of this LRPC

Chairman as stated in the Corporation Business Meeting Minutes in 1996 but then removed by misuse of the BY-LAWS and knowingly, intentionally, recklessly and negligently doing frauds and omissions of truthful disclosure by the violations of Process by the Pastors Schism I & II in breach of the “good faith” duty ignoring issues as reported in verbal coaching and as a letter from Plaintiff Townsend to Hillsborough County Administrator Mr. Daniel A. Kleman, in 1995, shows with copies sent to Hillsborough County Commissioners.

69. Plaintiff Townsend alleges from 1996-1999, Plaintiff Townsend as LRPC Chairman 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 father, Jr. Beck, in tears cried on Plaintiff’s shoulder at the Citrus Park Mall the last time Plaintiff Townsend saw Junior Beck before he died, at what he knew his son Ron Beck intentionally did to my family just to get his abusive way by the naïve church members who to this day are still naïve by the actions of the “pastors schism” using Schism “hired guns” as attorneys and accountants and others doing fraud

70. Plaintiff Townsend 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, and as Florida Youth Soccer Association “Volunteer of the Year in 1995, “Plaintiff worked with the Florida Youth Soccer and 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. Plaintiff had discussions with County Planners to have the County as options of the FBCCP LRPC study of a MASTER PLAN purchase the 7705 Gunn Highway site and develop a Citrus Park Community Center as the Keystone Park Community Center is designed as this would compensate for the crowded Citrus Park Little League. Plaintiff Townsend even advised Church Pastors and LRPC and other members that the new property 18105 Gunn Highway residents in the 1990's opposed developing the Sports Complex at the existing Keystone Park and or even adding additional "banks of lights on existing poles" due to the complaints of local residents and that the Citrus Park Christian School and FBCCP proposed sports complex would be an unsuccessful attempt on the 18105 Gunn Highway property and that before purchase of the property a letter of intent and approval of permits should be accomplished with the County and the Community as a "reasonable duty" of Corporation planning.

71. Plaintiff Townsend alleges that Beck and the pastors were fully aware of the problems in the 18105 Gunn Highway site in trying to: A. encroach on the One house per five acres rule; B. the Brooker Creek water shed rights issues; C. and the Intensity of the crowded roads; D. even moving the first plat plan of the Veteran Expressway farther east away from the Keystone Park area; E. Protection of the rural scenic Gunn Highway Corridor north towards the Pasco County line from South Mobley Road and Plaintiff alleges that the "pastors schism I" showed no interest or concerns to these "reasonable" issues of Plaintiff Townsend as the LRPC Chairman. Plaintiff Townsend now alleges that the intentional recklessness to this reasonable concern by this Plaintiff as the LRPC

Chairman and the 10 years of actions by the Pastors Schism I, shows the intent of the Pastors Schism I, was not for the FIDUCIARY GOOD of the Corporation but done for “job security and pecuniary gain” at the expense of the Corporation, and these Plaintiffs.

72. Plaintiff alleges that Beck and the “pastor schism” has sought to “kill Plaintiff 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 Plaintiff said for over 10 years As Judge Arnold and Margaret Tussing of Hillsborough County Planning and Zoning ruled but even these pastors refuse to acknowledge as even Herman Miester stated the Clergy False Plan by saying in the St. Petersburg Times Newspaper on May 28, 2004, “I believe once we get out there and get settled, most of the criticism will go away,” ignoring his own previous statements of the same community issues and concerns stated by even himself in the St. Petersburg Times on September 13, 1996, saying, “It is bumper-to-bumper,” Meister said. “I would say that we average an accident a week at Ehrlich and Gunn. I just don’t think that they’ve considered the safety of the children and the people in this area.” Yet making these statements about the 7705 Gunn Highway property these Clergy intentionally ignored that these same issues were the basis not even about one year later to not purchase the 18105 North Gunn Highway property as the issues of traffic congestion, density, environmental damage and “safety of the children and the people in this area” and ignoring the watershed issues and density traffic issues and other issues were additional reasons not to buy the 18105 Property but Beck had to have the Earl Home as his new parsonage and therefore ignored the betterment of the FBCCP.

73. Plaintiff alleges that the most logical position with now after knowing Ron Beck

since high school in the 1970's and even having his father (Junior Beck) as one of Plaintiff Townsends best friends until he passed was Beck had to deceive and help the estranged wife as his employee to destroy the family in order to get all Townsend's out of his way to try to "kill the messenger" as the opposition to the frauds of Ron Becks "Vision" despite this "VISION" being in direct conflict with the words of Beck himself.

74. Plaintiff Townsend alleges Plaintiff's father and mother pled to Beck and the Schism many times for help not destroying their Grandkids and the marriage but Beck lied to them and did fraud with the others to allege the actions were proper as a "pastor" or as a Schism.

75. Plaintiff alleges further that (2) THESE FINANCIAL RECORDS AS JUST PRODUCED PER THE MAY 10, 2006, **ORDER**, and RECORDS STILL NOT PRODUCED WILL SHOW AND PROVE THESE ALLEGED OFFICERS OF THE CORPORATION WERE AND ARE IN VIOLATION OF THEIR DUTIES AS OFFICERS AND IN VIOLATIONS OF CRIMINAL LAWS now these many years as THE GENERAL VOTING CONGREGATION AS VESTED MEMBERS and Trustee J. Kerns, several now departed members 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 liable to and by the General Voting Congregation as Plaintiff Randall Townsend has been trying and is now attempting to do on behalf of himself and for the minor plaintiff members for whom Plaintiff Townsend represents by his arguments since 1994, and by attempts since 1995, to gain the proofs of

the alleged frauds and do per the process the law in 1999, by going to Grant, Gibbs, Scruggs and Gray and others in law enforcement for the violations of law as Corporate Officers. The "Audit" was an addition promotion of fraud as now proved by these facts and Plaintiff Townsend again on September 7, 2006, in DISCOVERY MOTIONS to the Court of Judge Marva Crenshaw has been denied by the delays of Judge Marva Crenshaw and Attorney Denny and Attorney Rolfes present in the Courtroom on September 7, 2006, to get the AUDIT and Reports done allegedly by accountants JANSSEN & HORGAN on or about October 27, 1999, and not learned of by Plaintiff until the partial production of documents on June 10, 2006 yet this member has full §617, Florida Statutes rights to this full report and said report is needed for presentation of Plaintiffs full case to the courts and to the jury. Plaintiffs still seek all DISCOVERY of records still concealed.

76. Plaintiff alleges it was true in 1995, and more true now that Plaintiff as member get the chance to see the clearer picture of the frauds in and by the June 12, 2006, Documents and Credit Card Bills as 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 and Plaintiff all this time by the Pastors Schism I & II and Attorneys Scruggs and Attorney Denny was required to appear to be removed from ALL Plaintiffs positions of Duty and rights as an honorable member of the Nominations Committee and honorable rights and duties as a general member to investigate unethical, unlawful and or uncivil actions by Pastors, or Officers or members of the Corporation and Defendant's as Pastors Schism I & II, violated the process of the FBCCP Corporation Constitution and BY-LAWS and began frauds and Omissions of truthful disclosure.

77. Plaintiff alleges these frauds of fraudulent Corporation Business Audits and omissions of truthful disclosure did on October 10, 1999, lead to and cause this Plaintiff as father and member and husband out of fear of being arrested and put in jail as per **Simpson v. City Of Miami** 700 So2d 87, per §741.30(9)(b) “a person who violates a domestic violence injunction must be held in custody until brought before the court” as all allegations of abuse from Beck, Meister, Howlett, Jeffers and others grew greater for the injurious falsehoods allegations being told by the Pastors Schism I & II, and the omissions of truthful disclosures of the now former wife, Karen Harrod Townsend stating, “how can you be so right and these other six men be so wrong” and thereby caused this Plaintiff to require for his safety and the safety from additional infliction of emotional distress to the marital children and try to keep the home a safe dwelling required the estranged wife upon choosing to believe the frauds and omissions of truthful disclosure allegations by the Pastors Schisms I & II, and fearing the Actions and threats of Trustee’s Howlett as a Sheriff Deputy to arrest this Plaintiff even in his own home due to the allegations of ABUSE made by the Pastors Schism I and Pastors Schism II to the Awana and CPCS Teachers and Employees, September 8-9, 1999, and the omissions of truthful disclosure and silence of the estranged wife and mother and then these Attorneys, Judges and Law Enforcement officers do violate the rights of this Plaintiff and all the Children and do conceal frauds of themselves and of the unlawful “Benefit of Clergy”. Plaintiffs were also due to frauds and omissions of truthful disclosures of Clergy and Deputies and Karen Harrod Townsend subjected to fear and abuse on other public properties and religious properties in Clay County, Pinellas County and Pasco County as well as Hillsborough County, Florida, due to the actions of Beck, Brown and Meister to

allege criminal conduct of Plaintiff Townsend per the scheme to fraud from September 8, 1999, to present using false statements and the “INJUNCTIONS” of November 2001 and the 2003, Divorce Injunctions known to have been gained by intentional fraud of courts.

78. Plaintiff Randall Townsend alleges that these Produced Corporation records of June 12, 2006, BUSINESS MEETING MINUTES AND REPORTS, Confirm that on September 8, 1999, that over \$200,000.00 had not been properly reported per the BY-LAWS during the BUSINESS MEETING REPORTS OF the 2nd, 3rd or 4th Quarter as from January 1999-September 1999, and Plaintiff was advised that these designated Building Funds and Corporation funds were “none of your business” by Gary Leatherman, Tim Jeffers, Ron Beck, Herman Meister, Joe Howlett and William Brown during May 1999- through January 23, 2000 as on January 23, 2000, this Plaintiff had to quietly sneak into the balcony of the Church during the Business Meeting to get a right to try to address all matters to the General Voting Members of the FBCCP Corporation as Plaintiff had been barred from the Property during the October 31, 1999, Business Meeting and from the property at 7705 Gunn Highway at other times as a member and as a school/church parent of Plaintiffs J.D.T. and J.G.T as students at FBCCP and CPCS.

79. Plaintiff Randall Townsend alleges that these Produced Corporation records of July 10, 2006, as the Corporation Credit Card Billings FOR RON BECK, revealed for the first time proof of violations of the Corporation by Ron Beck as these purchases were not By law reported in the FBCCP Business Meeting Reports, not reported properly as required by detailed line item and show patterns of “pecuniary gain” and “secret accounts” at the expense of the Corporation and that during the July –September 1999, period Ron Beck spent over \$2,700.00 on his Credit Card that was (1) not reported and (2) caused William

Brown as Pastor of Administration to tell this Plaintiff as Awana Commander to “hold off buying the needed start up Awana materials and supplies because the Church is out of money and didn’t you see the pastors pen message about the offerings in the bulletin?”

(3) show misuse of the privilege of the Credit Card by philanthropic purchases and (4) by concealing these “Benefits of Clergy” from the General Voting Member per the BY-LAWS REPORTING POLICIES as stated in Plaintiff alleges that had these Awana Workers and Awana parents and the General Voting Members known of the “theft of the Awana microphone” and the misuse of this Corporation Credit card causing these Awana Material not to be purchased and the additional frauds of Ron Beck individual and of the Trustee’s and other pastors that these Corporation Officers (5) authorized designated funds to purchase “sound equipment” for the personal benefit of Ron Beck again at the expense of the Awana Children and shows the alleged FBCCP officers would have been fired and Plaintiff would have pursued Criminal Charges at that time in 1999 had Plaintiff Randall Townsend not been presented as “dangerous” and “abuser” and “suffering from a stress related breakdown” and “a liar” and leading to the allegation of a “stalker by repeat violence” and “stalker” and “Domestically Violent” and to the allegation as a “child molester” so that April 30, 2000, the “Schisms” could and did call a Special Business Meeting and to remove this Plaintiff from the General Voting Membership by the frauds as state herein rather than face jail should Plaintiff ever be allowed to fully speak upon production of all Corporation Records. Plaintiff Townsend also alleged the FBCCP vehicles as the Church Bus and Vans were unsafe and dangerous and even illegally used for the transportation of the children and placed the Corporation and Children at “risk” yet these alleged “trustees” as Sheriff Deputies violated the “uniforms of trustees and

deputies” and ignored the violations uses of FBCCP vehicles and safety of the children.

80. Plaintiff alleges that the Financial Audit done by the Firm of Janssen & Horgan C.P.A.’S, P.A.(JANSSEN) per the letter dated October 27, 1999, with no attachments or follow up reports as inferred would be prepared as “We have discussed several ideas with the finance committee, administrative pastor, and financial secretary. In the near future, a written management letter will be provided that will outline those and other suggested improvements.” are an incomplete attempt at fraud by the Pastors Schism to omit truthful disclosure to this Plaintiff and the General Voting Member and that the “finding” of this JANSSEN was brought about to console and connive the General Voting Member that the allegations of this Plaintiff were fraud at that time. Plaintiff alleges that this AUDIT was not conclusive to all issues raised by this Plaintiff and does not reveal all frauds.

81. Plaintiff Randall Townsend alleges that each FINANCE COMMITTEE REPORT from 1996 through those presently produced on June 12, 2006, are in **violation to Florida Statue §617.1601 Corporate Records keeping guidelines and other sections and violation of the FBCCP BY-LAWS ARTICLE III. D. (10). (j-l)**, and that Florida Statue §617.1602, Inspections of records by members, rights have been violated against this member and against the General Voting Member through fraud and deceptions by the intentional, willing, reckless and negligent actions with malice and for personal gain by the Pastors Schism I & II, and by Attorney’s Grant, Gibbs, Gardner, Denny, Rolfes, Scruggs and Gray acting with Judges Palomino, Timmerman, Gomez, Sierra, Menendez, Holder, Stoddard, Arnold and Judges of the 2 DCA with Judge Crenshaw even on returning from her recess to collect her thoughts from the recap of facts stating
MARCH 1, 2006:

PAGE 30, Line 3,

“THE COURT: Mr. Townsend, I am going to take a moment and see if I can put this case into perspective that it must be put in.

Without question you have obviously been hurt by the breakup of your family, by your inability to see your kids on what you’re telling me some significant period of time, by the now separation from what ever employment you had, by what you believe has been a betrayal of your trust by your former attorney, Mr. Scruggs.

Notwithstanding those things, notwithstanding your statements to me on a number of prior occasions as to what you believe the church members, the deacons and the pastor, have misrepresented at various proceedings throughout their appearances in this court system, I am constrained by the requirements of the law; meaning, I can only address legal issues and rule in accordance with the dictates of the law. That is my responsibility....

PAGE 31, Line 6,

“It is clear from what you’re saying you’ve got a number of other cases. Perhaps parts of your family law case are still ongoing. You cannot continue to bring those things into this case in an improper format. If they are related, and in life everything is related at some point, but unless those matters are related in a legal sense, I can’t permit you to continue to present them in the fashion that you’re presenting them.

So why did I go through that exercise. At the outset, at least once if not twice, I interrupted you to try to get you to focus on the legal motions. Superimposed on everything that this Court does is fundamental due process, the rule of law. The Court must rule on legal motions: for example, the most straightforward was the motion for contempt. Under no scenario can I say you either laid out, presented or stated a basis for finding any kind of contempt....”

Plaintiff Townsend states that Judge Crenshaw was with and by her own words revealing her own prejudice and bias and incriminating herself by intentionally still limiting the presentation of the “fundamental due process, the rule of law” of Plaintiff and protecting any and all attorneys and judges from being proved doing “intrinsic” or “extrinsic” or “fraud on the court” even attorney former Judge/Colleague Scruggs and thereby also Denny (with attorney Client duties to Townsend as a General Member per the By-laws) and others and on or after the Arguments of September 7, 2006, through her **RECUSAL ORDER** of September 22, 2006, finally reading all of the Written evidence presented to the COURTS by Respondent/Plaintiff Townsend even going back to the evidence put in the 02-03812 case files back in the ORIGINAL CASE FILED ON APRIL 25, 2002, and

from the Case files of these underlying matters of Case file 01-15813 and 01-15814, back to Judge Palomino and used fraudulently by Attorney Scruggs who by law had the same Contractual duties as: (1) Attorney Client and (2) as Judge/Attorney to follow all the law that did also include Denny, Rolfes, Gibbs, Grant, Gardner, and all Judges Palomino, Arnold, Timmerman, Gomez, Menendez, Sierra, Holder, Stoddard and the 2 DCA and that Judge Crenshaw had to knowingly now include herself, other Judges and Attorneys and each Defendant as stated now herein this Federal Case and as she said, on:

“PAGE 36, Line 12, Okay. But that’s former Judge Scruggs. The defendant in this case is Ronald Beck and the church.”

As sufficient facts to obtain Sanctions against Attorney Denny, Rolfes and the Firm of Dickinson & Gibbons were “laid out, presented or stated a bases for any kind of contempt” by stating:

“PAGE 8, Line 22, Mr. Townsend: Yes, Your Honor, my position on that point alone would be that prior to the hearing before Judge Arnold on January the 21st, 2003, I instructed Mr. Denny to shepardize his cases, that he was about to present fraudulent cases to the Court of Judge Arnold. He refused to do so. Those actual cases, Your Honor, are exactly what this Court used in understanding the ruling of **KOND**, and which was later quashed the subcase under **KOND** being **DOE v. EVANS**.

In 2002, March 14th, those cases that they relied on called **DOE v. Malicki**.

PAGE 19, Line 22, ...Your Honor, I also –the last time we were before the Court mentioned that Mr. Denny was in a conflict of interest representing Mr. Beck individually and also then representing the church, you see, because I think those are two distinct issues when we go back and look at other cases like Fritovich (phonetic) which is 598 So.2d. 265, and other cases...”

PAGE 28, Line 12,...I’ve protected every one of my statues of limitations. I’ve protected every one of my rights and show where Mr. Denny has only been covering for his client’s lies all the way back to the first piece of paper he produced where it showed a case **DOE. V. EVANS**, Your Honor, when he used 25 Florida Law Weekly cases, when week 27, was already published. He already knew **DOE v. EVANS** was overturned by the Florida State Supreme Court in their later ruling. He already knew **Malicki v. Doe** was overturned. He already had that knowledge. I gave him that knowledge, Your Honor, and also in documents I presented to the Court showing the new cite numbers, the 814 on March 22, I believe, 2002, was the actual dates of those, Your Honor, where he’s still going and using cases that were a year old intentionally to convince the Court that

they had no standing against the church because we might get into Ecclesiastical matters... It has only been a fraud and a continual practice by the attorneys to fraud the truth..."

Plaintiff had presented over 25 requests for the production of records of the Corporation and Beck and others and still Judge Crenshaw refused to sanction, reprimand or award any full requests of this Pro Se but Judge Crenshaw continues to reprimand and duress the attempts of Plaintiff to follow the RULES of LAW she claims to honor.

Even on May 10, 2006, in Reading the elements of Malicious Prosecution to knowingly continue a litigation is also proof of continuing Malicious Prosecution and by the agreed actions that Judge Crenshaw acknowledged were Malpractice and damages by Scruggs she also was showing Denny, Grant, Gibbs, Gardner, Gray, herself, Timmerman, Palomino, Holder, Sierra, Gomez, Stoddard and the 2DCA as part of the frauds and Malicious Prosecution and showing this proves the frauds of any other attorney or Judge that reads these pleadings and continues to divest and damage these Plaintiffs.

This conflict of representation is especially true when the Concealed Corporation Documents are produced in 2006, and Townsend is proved to still be a Corporation Member never removed legally from his Church membership and positions and DENNY by the concealment of these facts was concealing and breaching his DUTY and CODE OF ETHICS to Plaintiff Townsend and for whom Plaintiff Townsend speaks and all innocent and frauded church members and Omega Insurance with knowledge of these facts delayed Settlement and Denny and others willfully extend the damages done to Plaintiffs.

Also the fact that any Court action was extended by Denny is now showing cause for Sanctions and even the reimbursement of Townsend's \$924.00, paid to get

interrogatories answered while Townsend was alleged a non member but now that membership is proved all COURT ACTIONS per Florida Statutes §617 are due to be reimbursed to Townsend and paid by the Corporation or this gives “Benefit of Clergy” and continues to keep this Plaintiff as a victim of the injurious falsehoods of the alleged righteous Corporation officers and this is giving unlawful “benefit to clergy” as even critical Corporate Records ordered to be produced in the May 10, 2006, **ORDER** of this Court has been ignored by the Pastors Schism I & II and the intentional actions of Attorney Charles Denny still to fully conceal the actions of the Pastors Schism I & II, from this General Voting Member, Plaintiff and father trying to regain his relationship with his Children not unlawfully interfered with for 10 years by the Pastors Schism.

82. Plaintiff Alleges that the just produced June 12, 2006 copies of the fraudulently hid April 30, 2000, Special Called Business Meeting was in violation of the BY-LAWS and IN VIOLATION OF THE SPECIFIC RIGHTS OF THIS MEMBER NOT TO BE PRESENT TO REPRESENT HIMSELF FROM THE INJURIOUS FALSEHOODS ALLEGED BY THE PASTORS SCHISM IN DIRECT VIOLATION OF BY-LAWS ARTICLE V. SECTION 4 (e), and ARTICLE III. SECTION 7 (A-G). Plaintiff offers this is further proof of the accrual of conspiracy issues by the Defendants as “Pastors Schism” and the “hired guns” and other Defendants of agencies and individuals who allowed the Constitutional, Civil and Criminal Restitution Rights and BY-LAWS Contractual rights of these Plaintiffs to be violated now 1999 or before by the Conspiracy of the Pastors Schism I & II and negligence of other defendants. At many multiple times these partially produced records reveal the Schism members illegally acquired “hired guns” as expert “Maneuver’s” in collusion to convey frauds and omissions of truthful disclosure of the

Schism to install misrepresentation, false hope and false confidence in the allegations of the Schism members and others as attorneys to conceal malpractice to the general voting members as these Plaintiffs herein and even these “maneuver experts” were used to convey marital counseling and false counseling to Plaintiff Townsend’s children J.D.T and J.G.T, which still to this day prevents these children to understand truth this Plaintiff Father is trying to prove through the courts being blocked by judges and attorneys so Each Plaintiff can restore lost relationships.

83. Plaintiff alleges 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:

A. **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 the lost rights intentionally to conceal the just revealed June/July 2006 produced FBCCP documents showing criminal acts of Schism members in coercion with the frauds of Defendant Karen Harrod Townsend and others.

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 the children now since September 8, 1999.

Plaintiff with the production of the June 12, 2006, Documents alleges 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 in violation of the State Statues and BY-LAWS 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 Gardner used frauds (to the wife/employee and to the allegedly independent SCHOOL BOARD and to Plaintiff) 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 to fraud and abuse As advised to Charles Scruggs in April 2002 by the letters and as Plaintiff as Client had pled and warned in July 2000 and in the 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 not Plaintiff Townsend but Scruggs used that to keep Plaintiff from the children so Plaintiff could not report Scruggs torts of frauds and negligence and unethical misconduct in July 2000, when he should have called DCF and turned in the Mother and the “pastors schism”, Dr. Lon Lynn, Grant, Gibbs and others. Attorneys Denny and Stacey Turmel and Stanford Solomon intentionally promoted known fraud to and with Judge Timmerman, Gomez, Sierra, Palomino, Crenshaw, Stoddard, Holder, 2DCA and others and these deceptions were continued by Attorneys Gray, Denny, and others.

B. 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 the father as Townsend and the minor 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 and now years of abuse is present and provable in court.

84. Plaintiff Townsend alleges that these recent productions of document prove Beck and Meister as “Pastor Schism I” began their two part plan to remove Plaintiff from all his positions by frauds and injurious falsehoods and part one was to use the marriage counseling of Beck and Meister starting in 1996, of the employee/estranged wife starting their “pastors scheme” tied to the Actions of the APRIL 14, 1996, COGAN INDUSTRIES MEETING and the FACT FINDING OF THE \$10,000,000.00 PROJECT that caused the PASTORS SCHISM I to lie to the wife to tell the wife in counseling 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 Beck turns around years later

and sues Plaintiff 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 all children and Plaintiff and then to other employees and then to the courts and PART TWO, to misrepresent to the Deacons the “Pastors Schism I” allegations of the BY-LAWS that the LRPC Chairman had to allegedly “roll off” the LRPC Committee at the end of a three year term as this Plaintiff Townsend’s first term would have expired in 1996-1997, but the Deacons refused the Positions of the “Pastors Schism I” and therefore the “Pastors Schism I” using the “AD HOC” PROVISION OF THE BY-LAWS formed the new PHASE ONE Committee and removed by fraud the duties committed to the GENERAL VOTING MEMBERS by Beck in January –March 1996, Business Meetings.

85. Plaintiff alleges On August 11, 1999, these “pastors schism” as reported in the “Church Issues Journal” of September/October 1999, page 41, confirms the 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/church member/leader/ state security officer now plaintiff on August 11, 1999, to “resign all church positions” and Plaintiff 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 as proved by the Production of partial Corporation Records now in 2006, demanded to Beck and other FBCCP officers in 1999 to date by

this FBCCP member and the Deacons, School Board, and Schism supporters knowingly, intentionally, recklessly and negligently continued violation of the BY-LAWS and Contracts and Due Process by doing fraud to and with alleged experts as Grant, Gibbs, Gardner, Denny, Dr. Lon Lynn and others as “DOE” attorneys hired during the “Permit” phases of litigation and by acts of Denny and Rolfes and others to be revealed upon review of all Corporation Records not yet produced to these litigant Plaintiff members.

86. Plaintiff Alleges 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. Defendants started the extortion and frauds and now all defendants are joint tortfeasors to the fact that Karen Harrod Townsend lies and uses all to abuse and destroy plaintiffs children J.D.T. and J.G.T and still today helped by judges using the torts and frauds of Scruggs and Turmel and Judge Timmerman and all judges of the Thirteenth Circuit after hearing the facts continuing the endangerment through the **DIVORCE JUDGEMENT WITH INJUNCTIONS** and the “schism”.

87. Plaintiffs allege the estranged wife’s brother (Steve Harrod) and Karen Harrod Townsend even advised the court of Judge Holder and Anchor Court Reporting associates in December 2005, that Plaintiff Townsend as this father was under a COURT ORDER that does not allow Plaintiff to “contact” his children and thus conceal 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.

88. Plaintiff alleges PER Wests F.S.A. §95.031, LIMITATIONS OF ACTIONS ¶ 43

“A statute 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.”

89. Plaintiff Townsend alleges that Defendant Karen Harrod Townsend as the Employee and Member of FBCCP and CPCS 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** and 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 Plaintiff 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 as Plaintiffs now have the June/July 2006 FBCCP Documents to 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 and with the frauds of Denny alleging the now recanted First Affirmative Defense and “concealing Townsend with membership rights” and still concealing FBCCP & CPCS Records that

this is Continuation “CONVERSION Liability” and the principle of “CONSCIOUS PARALLELISM” and of “Compounding a felony” by all defendants against Plaintiffs.

90. Plaintiff alleges The FOURTH AMENDMENT protects Plaintiffs legal rights and those of all 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” orders to seize “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 they did exactly opposite what Judge Palomino **ORDERED and WARNED TO STOP** as the transcript shows Judge Palomino cautioned Defendants on interference with child custody issues and even giving Scruggs an approval to let Townsend testify as to how or all that was being done to prevent Plaintiff Townsend and the Plaintiff Children from having a normal relationship as the letters from Minors J.D.T and J.G.T show were being impeded by the collusion of the mother, Beck, Scruggs, Meister, Leatherman, Howlett and others of the Corporation as School Employee’s, Church Members and Parents and others as Associates who as even reported in the transcript of 01-15814, testimony by Karen Harrod Townsend to Judge Palomino, “What do I tell the parents” yet Defendants removal of Plaintiff Townsend’s children got worse as is proved by the Dr. HOYOS and DR. MILLAN REPORTS! Thus ALL have been in violation of the Judge Palomino **ORDER**, since 2001 and this includes SCRUGGS, GRAY, TIMMERMAN, GOMEZ, SIERRA, DENNY, CRENSHAW, HOLDER, STODDARD, MENENDEZ, AND ALL OTHERS AS DEFENDANTS SHOWING NEGLECT OF DUTY TO HONOR THE

COURT ORDER OF JUDGE PALOMINO AND MISS USING FRAUD OF IT TO AND WITH all agents and departments and others blocking my rights as a free parent/protector to all children! **Even as a PRO SE, Plaintiff should have the right to interview his own children so to clear reputations from these false charges by the former wife, the pastors schism and the fraud silence by Scruggs and Gray and frauds of other Defendants as stated herein. The falsehoods of Plaintiff Townsend's reputation led to and did cause termination of employment and impedes future employment due to being label per the charges of alleged "clergy" and other defendants and the failure to do "duty" of same.**

91. Plaintiff alleges the frauds of are allowing the maternal family(HARRODS) and "pastors schism" to still try to put Plaintiff in Jail as the estranged former wife and Beck have violated the Plaintiff and the children now for 10 years and law enforcement does nothing. Defendant (Steve Harrod) allegedly called the Santa Rosa County Sheriff on Plaintiff in 2002, the last time Plaintiff tried to see daughter J.G.T. (a minor with me with full custody at the time) and they will do it again as they know the actions of Attorney Scruggs and Judge Timmerman and Beck and others will 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. Also again on December 25, 2006, Plaintiff Townsend did travel to Pace, Florida driving over 500 miles one way to see his children on Christmas Day, and was denied visiting or any contact rights by Defendants Karen Harrod Townsend, Norma Harrod, Donald Harrod, Steven Harrod and by Deputy

Sergeant Wheeler who refused to assist in the enforcement of the injunction and did nothing more than issue an incident number and “strongly” advised Plaintiff Townsend to “return to Tampa” as previous attempts to involve the Santa Rosa Sheriff per the law has been violated in their failure of duties.

92. Plaintiff Townsend 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 Gibbs, Gardner and Denny, ROlfes 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 in March 2006, it was Joe Howlett in November 2001 who filed to him the falsely charged report about Plaintiff and this brought Baughman to the Court of Judge Palomino on November 15, 2001). This proves that the charges made by Ron Beck(1999) by fraud of the BY-LAWS and the Florida Statues and the Criminal Injurious Falsehoods to remove Townsend from the Church/School duties in violation of FBCCP BY-LAWS operating under F.S.617, ignored my DIRECT, INDIRECT and DIRIVATIVE RIGHTS per the 617 Laws and Plaintiffs 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 Townsend was or had done. INSTEAD SINCE PLAINTIFFS CHARGES IN AUGUST 1999, TO “SHOW ME THE MONEY” these men (Trustees and Deacons and Pastors) without lawful rights have destroyed Townsend’s family and children as extortion for their cover up of over \$200,000.00 missing money and them in August 1999, refusing to allow Townsend to see the corporation records to conspire to deceive now as the Records in part in June/July 2006 show beyond doubt criminal frauds and actions.

93. Plaintiff Townsend alleges BECK and his co-defendants CHARGED Plaintiff Townsend 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 as a Defendant of Criminal Acts Beck and others could not prove even by the failure of Scruggs to present Plaintiff Townsend 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 the 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 now in June/July 2006, or the 2006, Judge Barton Ruling, PROVE:

(1) 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 TOWNSEND 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 ruled he thought the rights as a father was being illegally

Impeded and with Plaintiff Townsends OCTOBER, 2003, **MOTION FOR REHEARING** presented to Judge Timmerman and all subsequent Complaints, Motions, Affidavits, Letters and Verbal Testimony and Exhibits presented to attorneys, law enforcement and to the Courts all Defendants have been informed and put on Notice of the frauds and omissions of truthful disclosure and misrepresentations of defendants verses the words and exhibits and affidavits used in the hearings before Judge Palomino on November 15, 2001, by defendants to do and continue frauds on the courts and use abuse of process and as the letter of Drew Gardner on behalf of the School Board in April 2002, agreed and acknowledged relevant matters and instead of doing “Duty” to the Corporation and the innocent and naïve Associates Gardner and Gibbs continue the fraud.

(2) Had the true intentions of Trustee/Sheriff Deputy Howlett and Beck and others as concerned persons of FBCCP truly sensed responsibility or “present danger” as alleged since September 8, 1999, and at all other various times the actions of reporting the events to Curtis Baughman in November 2001, showed breach of duty to report Child Abuse, Negligence and apathy to meet the duty alleged and further show malicious intent to do damage to the reputation of this Plaintiff unduly not as stated to protect themselves or anyone from fear or physical harm as per the transcript testimony to Judge Palomino on November 15, 2001, by Ron Beck on behalf of the FBCCP and himself. Instead this shows proof of the conspiracy to use the employee estranged wife to promote the allegations of Domestic Violence or attempt to show this plaintiff was “mentally ill” and “abusive” to cause the injurious falsehood to Judge Palomino in the need

to secure a permanent injunction not obtained but by frauds even later reported by Attorney Denny and the estranged wife via the attorneys to Judge Timmerman, Defendants did willfully and recklessly interfere with child custody and did inflict emotional distress and cause abuse of the children as reported by Dr. Hoyos and Dr. Millan. Further proof that outside the Pastors Schism all unbiased judges and other fully informed persons align with the positions of this Plaintiff as being the true victim with his children and these other Plaintiffs who suffered without the presence of this Plaintiff Townsend attempting to daily know of all other abuse of the children as the “building and growth” expectations on the new 18105 North Gunn Highway obtained by frauds of Clergy and Illegally retained FBCCP trustees was to serve the interests of the children of the Church and School but for the frauds of the pastors, alleged trustees, deputies, attorneys, judges, state officials and public entities.

(3) Had he had a true presentation of the partial CHURCH RECORDS JUST RECEIVED then Charles Scruggs should have stopped Beck, the wife and the “SCHISM” and other frauds and even his had he got the Subpoena as the faxed letter to him on November 12, 2001, had demanded for him to do! Scruggs didn't because he in July 2000, had not reported the Child abuse, battery and money fraud then to the Courts to protect the FBCCP members and Contracts rights and as Scruggs sought not to reveal or violate his concealed superior knowledge of his “personal convictions” as not revealed until September 30, 2003, and by his letter above herein of February 16, 2007, proving his Ethical, Attorney/Client and total disregard for the rights of the Courts, Church members, Plaintiff and others for

whom Scruggs has taken an Oath to Obey the Rules of Law and Serve and PROTECT thereby.

(4) Florida Statues §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**”!

94. Plaintiffs alleges all Unlawful actions must be stopped and the violators in the Corporation and/or the Corporation stopped when it is a front for “unlawful” purposes and Plaintiff states, Where did Beck and the “SCHISM” get the rights to take away my marital and father/parenting rights just so they could conceal the criminal acts with the “hired guns” or the breach of duty and apathy of the Defendants as stated herein.

95. Plaintiff Townsend alleges that Florida Statues §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. AND §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 crimes to Deputies and these Courts and to the Citizens of Hillsborough County as reported herein and by negligence to the Duties of this Statue each individual and agency and Corporation and Department herein is an accomplice to the criminal actions of all Defendants.

96. Plaintiff alleges the May 5, 2000, June 16, 2000, and July 26, 2001, letters by

Defendant Beck, and all affidavits, court transcripts and other letters and exhibits as presented to the Circuit and Appeals Courts and attorneys and law officers, knowingly, intentionally, recklessly, and negligently was used by each Defendant to allege that the BY-LAWS were properly followed and that the Plaintiff Townsend was in “Breach of the BY-LAWS” and other State and Federal Laws and Rules of Civil and Criminal Procedure and therefore by frauds and improper use of the BY-LAWS using Sheriff Deputies (Howlett and Jeffers and Smoak and Corbin) and TPD officer Kieras, lawyers, Judges, others in law enforcement, state offices and agencies and others have intentionally and falsely slandered this Plaintiff and interfered with his Constitutional, and Contract By-Laws and legal rights and an each defendant herein is responsible for damages incurred by these Plaintiffs as stated herein and only until the production of these April 30, 2000, and other CHURCH BUSINESS MEETING MINUTES and the Ruling of this Court on May 10, 2006, to Produce these Records could Plaintiff unveil the Conspiracy by all Defendants assisting “Benefit of Clergy” of all illegal activities as stated herein.

97. Plaintiff Townsend alleges that the unlawful and illegal marriage and legal counseling given to Defendant Karen Harrod Townsend by Pastors, alleged FBCCP Trustees, law enforcement, lawyers and judges (Palomino, Timmerman, Gomez, Sierra, Holder, Crenshaw, Stoddard) by their own rulings or by omissions of truthful disclosure of Sheriff Deputies and Lawyers and Defendant Steven Tyler Harrod and others did cause Defendant Karen Harrod Townsend to do frauds and filings of false reports to the Sheriffs, Courts, Certified Public Accountants and United States Internal Revenue Service and these actions did inflict duress and financial frauds and damages against Plaintiff Townsend as the collusion and concealment by Defendants did allow fraudulent

advancement of “IRS Innocent Spouse” protections and gained by illegal claiming of the home mortgage interest and children as dependants and other frauds inflicted on Plaintiff Townsend by the omissions of truthful disclosure of income and these false tax filings by Defendant Karen Harrod Townsend as yet to be fully discovered and the concealment and advancement of these frauds is continued by the 2006 Rulings in the Courts of Judge Holder, Stoddard, and Judge Crenshaw and the Second District Court of Appeals.

98. Plaintiffs request this Federal court take Judicial Notice of all cases stated herein and incorporates all claims, claims for damages and all remedies for claims and new claim for damages as alleged and requested by Plaintiffs in all Plaintiffs cases as stated herein and plaintiffs pleas for all judgements of this court as so requested or demanded in all lower courts as stated in each Complaint, Amended Complaint, Motion or Appeal and Requests for Discovery and Requests for Injunctions and any and all new requests as required upon production of all discovery records as required for justice to be solved in these cases.

99. Plaintiff alleges per the “unstricken” portions of Paragraphs, as below herein per the specific ruling by Judge Crenshaw as to the allegations and duty of “Members” and violations of those members of said duty, apply, expand and include each defendant herein who also hold and violated the like duty to this Plaintiff who also obstruct this Plaintiff from his rights and to voice said rights to a jury and thereby Judge Crenshaw’s own rulings allowing the points to stand the Matters of Law have and are ready to be presented against all defendants to the jury as per matters of facts and damages.

Plaintiff Townsend alleges that the Complaints, AMENDED COMPLAINTS and Appeals filed as **TOWNSEND v. BECK et al.** As case 02-03812, and **TOWNSEND v. Scruggs et. Al** Case 05-0911 and as 2D06-2811 and **TOWNSEND v. GRAY et. Al**,

Case 06-6005, and **TOWNSEND v. TOWNSEND et al.** Case 05-9605, 02-4974 and 2D06-3469, be included herein FROM LOWER COURTS AND SECOND DISTRICT COURT OF APPEALS and be incorporated herein this Complaint and for jurisdiction of this UNITED STATES FEDERAL COURT MIDDLE DISTRICT, TAMPA FLORIDA. Further Point 100, is omitted herein and point 101 resumes the Complaint per the **ORDER** of the Judge Marva Crenshaw per the May 10, 2006, 02-3812, **CASE MANAGEMENT CONFERENCE** after plaintiff receiving the PRODUCTION OF CORPORATION RECORDS AS DEMANDED SINCE 1996 BUT WAS CONCEALED BY THE FRAUDS OF THE PASTORS SCHISM AND BY ATTORNEYS AND JUDGE CRENSHAW IN THE SEPTEMBER 7, 2006, VERBAL RULINGS PRIOR TO HER SELF RECUSAL BASED ON THE MOTION OF THIS PLAINTIFF AND BY OTHERS AS DEFENDANTS SHOWN HEREIN AND THUS ALL ACTS OF CONCEALMENT PER LAW PREVENT THE ACCRUAL OF THESE PENDING ISSUES BEFORE THIS COURT AS STATED HEREIN AGAINST THESE DEFENDANTS. Any or all reference to stricken paragraphs do not apply to the paragraphs as numbered herein but refer back to the Second Amended Complaint of April 19, 2004, in the number as shown therein.

TOWNSEND V. BECK et. Al **CASE 02-03812**
SECONDED AMENDED CIVIL ACTION FOR DAMAGES COMPLAINT
AND
DEMAND FOR JURY TRIAL

COUNT VI—MALICIOUS PROSECUTION—

AGAINST RON BECK, Individually, Reverend Ronald L. Beck, as Senior Pastor, and The Corporation of the First Baptist Church of Citrus Park, Inc., A Florida NOT FOR PROFIT CORPORATON

COMES NOW, RANDALL TOWNSEND, PRO SE, and sues

RONALD L. BECK, INDIVIDUALLY; REVERAND RONALD L. BECK, AS SENIOR PASTOR OF THE FIRST BAPTIST CHURCH OF CITRUS PARK; (HEREINAFTER AS FBCCP); FIRST BAPTIST CHURCH OF CITRUS PARK, A FLORIDA CORPORATION and alleges:

GENERAL ALLEGATIONS

101. This is an action for damages in excess of \$25,000.00.

102. At times material herein, Plaintiff resides in Hillsborough County, Florida.

103. Defendants, reside principally in Hillsborough County, Florida and d/b/a FBCCP in Hillsborough, County, Florida.

4.-5. STRIKE

106. THESE MEMBERS AT LARGE OF THE CORPORATION THEN WHO THEN VIOLATED KEEPING TO THEIR FIDUCIARY DUTIES TO ALLOW PLAINTIFF TO REVEAL HIS KNOWLEDGE OF THE “SECRET FUNDS” AND OTHER FLORIDA STATUE VIOLATIONS BY THE OFFICERS –THESE MEMBERS AT LARGE THEN BECAME CO-CONSPIRATORS AND DID DAMAGE THE CHARACTER AND REPUTATION OF THIS PLAINTIFF BY ALLOWING, AND BY GIVING THEIR VOTE OF APPROVAL FOR AND THEN BY PAYING FOR THE CHARGES TO BE FILED AND BY BEING WILLING TO OFFERING TESTIMONY IN SAID CASE OF MALICIOUS PROSECUTION AS ACTED OUT BY RON BECK AS INDIVIDUAL AND AS PER HIS OWN TESTIMONY TO JUDGE PALOMINO ON NOVEMBER 15, 2001, SAYING “WELL, FIRST, YOUR HONOR, I’D LIKE TO TELL YOU IT’S THE FIRST

TIME I'VE HAD TO DO SOMETHING LIKE THIS TO A PERSON BEFORE. AS A PASTOR I DON'T REALLY GO FOR THIS KIND OF STUFF, BUT OVER THE PAST TWO YEARS SINCE '99—AND I HAVE BROUGHT WITH ME A STACK OF SLANDEROUS AND FALSE MATERIALS THIS MAN HAS CONTINUED TO MAIL AND FAX TO ME AND TO MY STAFF AND TO OUR CHURCH MEMBERS. YOUR HONOR, I WOULD LIKE TO GIVE YOU A LETTER THAT HE WROTE HIMSELF ASKING THAT HIS MEMBERSHIP BE REMOVED FROM MY CHURCH, IF I MAY.” THE COURT REPLY’S, “ALL RIGHT. WELL, IN THIS LETTER DOES HE THREATEN PHYSICAL HARM TO YOU?” MR. BECK REPLY’S, “NO SIR. IT’S JUST A POINT I WANT TO MAKE THAT HE HAS VOLUNTARILY WITHDRAWN HIS MEMBERSHIP FROM OUR CHURCH, BUT HE WON’T LEAVE OUR CHURCH ALONE.” MR. BECK LATER CONTINUES, “—VOLUNTARILY REMOVING HIS MEMBERSHIP FROM OUR CHURCH. AND AFTER THAT LETTER—BY THE WAY , IN THE LETTER HE SAYS THIS ACTION I PRAY WILL BRING CLOSURE TO OUR CURRENT DISPUTE AND PROTECT MY WIFE, CHILDREN AND CHURCH BODY FROM ANY FURTHER ACTION ON THIS MATTER.”

107.MR. BECK FURTHER ADVISES JUDGE PALOMINO, “YOUR HONOR, ALL I WANT OUT OF THIS WHOLE THING IS FOR THIS MAN TO LEAVE THE CHURCH BODY ALONE. TO DISCONTINUE STALKING ME AS HE’S BEEN DOING ON A REGULAR BASIS, AND TO BE—TO DISCONTINUE SLANDEROUS MATERIALS MAILING OR FAXING OR e-

MAILING TO ME AND OUR CHURCH MEMBERS. I HAVE GOT A PILE
HERE OF STUFF THAT WOULD WASTE YOUR TIME READING, BUT
IT'S SLANDEROUS AND UNTRUE AND--." AND MR. BECK ALSO
STATED, "NO, ONCE AGAIN, THIS IS NOT AN INTENT BECAUSE OF
HIM CHALLENGING PHYSICAL HARM, BUT RATHER FEAR,
INTIMIDATION..." BECK THEN CREATED A FRAUDULENT
DESCRIPTION OF AN EVENT TO EXCITE THE JUDGE TO ORDER THE
RESTRAINING ORDER AS NEEDED AND DID NOT SAY PLAINTIFF WAS
INVITED TO BE AT THIS BUSINESS MEETING BY OTHER MEMBERS SO
THE TRUTH COULD BE TOLD, AND MR BECK CONTINUED,
"THREATENING TO BUST INTO A CHURCH SERVICE.
AND HE HAS COME ON THE PROPERTY AND WAS STOPPED BY
SEVERAL USHERS BECAUSE HE WAS GOING TO BUST INTO THE
SERVICE." IN ADDITION MR. BECK INFERS THAT HE IS THERE IN THE
COURT OF JUDGE PALOMINO ON BEHALF OF THE MEMBERSHIP AT
LARGE BECAUSE OF SAYING, "...LIKE I SAID, **WE'D**" (emphasis added),
**"LIKE TO SEE THIS CONTINUE BECAUSE FOR THE PAST TWO
WEEKS THERE'S BEEN A REAL PEACE AROUND THE CHURCH
PROPERTY WITHOUT THIS THING CONTINUING AND WITHOUT
GETTING THESE SLANDEROUS THINGS LIKE ON THE E-MAIL,
AND MY MEMBERSHIP ALSO GETTING THEM AND ALSO TURNING
THEM IN TO ME AND WONDERING ABOUT THEM AS WELL SO--."**

8.--10. STRIKE

111. Plaintiff also had duty as described above and herein and was asked by others to investigate and to report other acts of Negligence and Frauds and Conspiracy and Conspiracy to Defraud when Pastors and Pastors with Finance Committee members and trustees sought to defraud the Membership, Government Agencies and individuals, including Plaintiff's wife and minor children and Parents and even now the Courts when Defendants continue to try to allege Plaintiff is a "Liar", "Sower of Discord", "Dangerous" due to a "Stress related breakdown" and a "Stalker" or a "VIOLENT MAN. All accusations are pure frauds by Defendants to cover up their illegal conduct and violations of the BY-LAWS in an effort to allow Defendants to conceal their frauds to the membership and to the courts and government agencies including the false reports to the sheriff's department..

112.-26 STRIKE

127. PLAINTIFF ALLEGES THAT THESE MEMBERS AT LARGE OF THE CORPORATION AS A WHOLE WHEN LEARNING IN JANUARY 2000, AT THE BUSINESS MEETING THAT PLAINTIFF WAS TRUTHFUL IN THAT UNREPORTED MONEY SHOWED UP IN THE FORM OF CERTIFICATE OF DEPOSITS AND THAT IN SAID BUSINESS MEETING RON BECK TOLD SEVERAL FRAUDS THAT WERE EXPOSED AS FRAUDS THESE MEMBERS THEN CONTINUES TO EMPLOY RON BECK, WHO CONTINUE THEIR ABUSE OF THIS PLAINTIFF EVEN BY THE WORDS SAID AND THESE DEFENDANTS KNOW THAT THEIR ENTIRE ACCUSATIONS THAT THEY BELIEVE PLAINTIFF WAS A DANGEROUS

PERSON OR POTENTIALLY DANGEROUS WAS A CREATED FRAUD BY
THE PASTOR.

127.-29 STRIKE

130. Thus upon knowledge of said acts of the FBCCP PASTOR, acting
Individually, and acting as Officer of the **Corporation of FBCCP, he had an
individual FIDUCIARY and a CONTRACTUAL DUTY created by the
Contract language of the FBCCP “BY-LAWS” to constrain** themselves and
Ronald L. Beck, individual, and as Pastor of the Corporation **and prevent** actions
from Still causing and inflicting intentional harm, with malice upon Plaintiff and
Plaintiff’s family as Defendant Ronald L. Beck conspired to cover up the acts
Plaintiff tries to report acts which violated the Florida Statues and FBCCP
Policies and Procedures as stated in FBCCP “BY-LAWS” and Citrus Park
Christian School Handbook and Plaintiff is still being violated by the FALSE
ACCUSATIONS CREATED by the PASTOR AND OTHERS as they still try to
discredit and harm the integrity of Plaintiff as Plaintiff tries to still expose their
ongoing un-civil acts and violations of law and violations of Plaintiff’s CIVIL
RIGHTS AS THESE DEFENDANT CONTINUE TO PRACTICE HATE
CRIMES AND VIOLATE THE UNITED STATES OF AMERICA
CONSTITUTION AND OF THE CONSTITUTION OF THE STATE OF
FLORIDA AS THEY PRACTICE THESE HATE CRIMES KEEPING
PLAINTIFF FROM HIS CHILDREN BY THEIR FRAUDS AND LIES AND
AS THEY VIOLATE THE CONSTITUTIONS THAT CLEARLY STATE
THEY CANNOT USE OR HIDE BEHIND LAWS THAT TRY TO PROTECT

THEM BECAUSE THE CONSTITUTIONS CLEARLY STATE “NO LAWS SHALL IMPEDE THE OBLIGATION OF A CONTRACT” AND THESE DEFENDANTS WERE OBLIGATED TO THIS PLAINTIFF TO NOT SLANDER HIS GOOD NAME AND HARM HIS FAMILY BY THEIR ACTIONS AS THEY ASSISTED THE SENIOR PASTOR TO VIOLATE THE RIGHTS OF THIS PLAINTIFF BY FRAUDS.

131. In COERSION, claiming superior exclusive knowledge he gained from his hired experts Ronald L. Beck, using only the manipulated tainted information he wanted to reveal to the investigators in order to get their findings to reinforce him, inspired his wife, April Beck, and daughters Julianna Beck, Darla Beck, and other pastors William Brown, III, Herman Meister, and other members of FBCCP, Tim Jeffers, Karen Jeffers, Mike Shumate, Joe Howlett, Jackie Howlett, Robert Giles, and Gary Leatherman, Geoff Smith, Jim Bates, Carl W. (Buddy) Rawls, John Michael Corbin, Joe Kieras, Jim Leahy, Paula Powell, Tammy Nunes, Mark Nunes, Craig Tucker, Dr. Lon Lynn, Gayle Lynn, Shawn Hopkins, Jerry Miller and others, as individuals and collectively AS MEMBERS AT LARGE AS THE FBCCP CORPORATION did and continue jointly and independently conspire to tamper with “fact finding” and “cover up” of evidence and “tamper with and intimidate witnesses” in order to Obstruct Justice and continue frauds and create Frauds against Plaintiff in order to discredit the facts Plaintiff was trying to expose per Plaintiff’s DUTIES to the Corporation per the **FBCCP BY-LAWS, CONSTITUTION, POLICIES and FLORIDA STATUES** and these individuals continue to harass Plaintiff and Plaintiffs family

and continue to ruin and try to ruin Plaintiff's integrity and Plaintiff's relationships with Plaintiff's family and friends despite the revelations in the Land Use Hearings regarding Petition File Number SU 00-1203-KE and appeal number 01-1023 and the Circuit Court Case Number 01CA8320, as Gills Et al. V Hillsborough County and the findings thereof confirming the positions Plaintiff as CHAIRMAN OF THE LONG RANGE PLANNING COMMITTEE, tried to warn of and advise of to the Corporation however Ron Beck named Plaintiff as a "liar" and "a controller" and "worrier" **and "potentially violent due to a stress related breakdown"** to the points that this became THE DISTRACTION BECK AND THE PASTORS AND FINANCE COMMITTEE AND TRUSTEES NEEDED TO REMOVE THE INVESTIGATION OF THEIR ACTS and as planned TO GET THE DESIRED CONSEQUENCES OF KEEPING PLAINTIFF QUIET ABOUT THE VIOLATIONS BY THESE DEFENDANTS BY BECK AND MEISTER AND BROWN AND LEATHERMAN AND HOWLETT AND JEFFERS AND NUNES AND RAWLS AND DR. LYNN this threatened the Security anyone including Plaintiff's family might have from trusting any advice that Plaintiff might provide for stating these warnings and findings IN THESE ATTACHMENTS HEREIN AND NOW ALSO Confirmed by the legal process. Plaintiff alleges that there are patterns as examples that show Ron Beck when he does not get what he wants will use deceptive practices and destruction of the opponents integrity in order to manipulate his partly naïve subordinates to the point that if they do not agree with him he will turn on them and degrade them as well, not allowing them to defend

themselves from his attacks and these members knowingly allow these acts.

132. In coercion, Ron Beck and his pastors claiming in their pastoral roles to have superior knowledge **instigated marriage problems in Plaintiff's marriage** while they allegedly were trying to help and then used this created deceptions in order to discredit Plaintiff from being of a moral standard to be in leadership or a competent father or husband when BECK, MEISTER, BROWN AND LEATHERMAN AND GILES ON SEPTEMBER 8, 1999, BY FRAUDS removed Plaintiff from leadership so Plaintiff could not continue to prove out the deceptions about the money trail and the building scheme and theft of the children's microphone and other frauds and acts of criminal negligence of Ron Beck and the pastors, that Plaintiff became aware of as in Plaintiff's roles of leadership as per POINT (12) herein and is trying to reveal to the membership by Plaintiff doing his duty to the CORPORATION to reveal the frauds by the Pastors.

133. {STRIKE ALL} 33-43.

144. DEFENDANTS MEMBERS AT LARGE WERE NOTIFIED BY MULTIPLE LETTERS AND EVEN THE MINUTES FROM THE CORPORATION BUSINESS MEETINGS OF THE FRAUDS BY THE CORPORATION OFFICERS AND ARE, BY THE GIL'S LAWSUIT AND THIS LAWSUIT, BEING INFORMED OF THE BETRAYAL OF THE INVESTIGATION OF THE CORPORATE OFFICERS FINANCIAL REPORTING AND FRAUD BY DEFENDANT GARY LEATHERMAN TO THIS PLAINTIFF AND TO THE CORPORATION YET DEFENDANTS AS

MEMBERS AT LARGE STILL PRACTICED MULTIPLE HATE CRIMES OF EXTORTION AGAINST THIS PLAINTIFF INCLUDING TELLING PLAINTIFF TO LEAVE PUBLIC STREETS OR PUBLIC PROPERTY AS PLAINTIFF TRIED TO REACH TO HIS KIDS AS A CONCERNED PARENT AND INCLUDING ALLOWING THE FILING BY DEFENDANT BECK OF THE CHARGES OF AS A “STALKER” WHEN PLAINTIFF HAD NEVER BEEN LEGALLY DEPRIVED OF HIS CONSTITUTIONAL PARENT RIGHTS THESE MEMBERS AT LARGE PUT THEMSELVES ABOVE THE LAW AND PRACTICED HATE CRIMES AGAINST THIS PLAINTIFF INCLUDING ATTEMPTED FALSE CHARGES TO LAW ENFORCEMENT OFFICERS IN ORDER TO HAVE PLAINTIFF ARRESTED AND THESE ACTS DID CAUSE PLAINTIFF TO BE HARRASSED BY A SHERIFF DEPUTY ON MULTIPLE OCASSIONS WHEN PLAINTIFF WAS INVESTIGATED ON THESE ALLEGED AND FALSE CHARGES REPEATEDLY CREATED BY VARIOUS MEMBERS AT LARGE AS THEY WILLINGLY PARTICIPATED IN THE CONSPIRACY TO KEEP PLAINTIFF FROM BEING FOUND TRUTHFUL AS THE CHAIRMAN OF THE LONG RANGE PLANNING COMMITTEE DUTIES REQUIRED PLAINTIFF TELLING THE TRUTH NOW BEING REVEALED IN THIS LAWSUIT AS PLAINTIFF WAS FOUND TO BE TRUTHFUL IN THE CASE BEFORE JUDGE ARNOLD IN GIL’S V. HILLSBOROUGH COUNTY STOPPED THE CORPORATION FROM BUILDING ON THE NEW PROPERTY AS PLAINTIFF ADVISED THE MEMBERSHIP AT LARGE AND THIS

MEMBERSHIP AT LARGE ACTED WILLFULLY TO TAMPER AND MAKE FALSE ACCUSTIONS AGAINST THIS PLAINTIFF BECAUSE THIS PLAINTIFF WAS OBEYING THE LAWS THIS MEMBERSHIP AT LARGE WAS TRYING TO VIOLATE BUT NOW STOPPED BY THE COURT RULING OF JUDGE ARNOLD.

145. At all times herein mentioned, Defendants Ron Beck, was the agent or employee or both of Defendant First Baptist Church of Citrus Park, and in doing the things herein alleged was acting within the course and scope of such agency and with permission and consent of his codefendant and with the authority for the Defendant First Baptist Church of Citrus Park as membership at large.

146. {STRIKE}46-49.

150. Defendant Ron Beck speaking as the moderator of the meeting and as the Senior Pastor and as a member of the Committee answered: "Pastor Beck- No we have not checked. We will check with legal matter so see if we would have any problems."

151. {STRIKE}

152. Defendant Ron Beck speaking as the moderator of the meeting and as Senior Pastor and as a member of the Committee answered: "Pastor Beck- Brother Joe, as chair, can I recommend that and pass that recommendation to our Chairman of the Finance Committee and have him dig into that and find and get information for you.

153. At the time defendants made the above representations to Plaintiff, all Defendants were aware but did not inform Plaintiff that they were not

reporting in full all monies for many QUARTERLY REPORTS , “A detailed and comprehensive report of all receipts and disbursements, balances, etc., of the Church and the Christian School,...” but implied that all reported information was truthful and complete so no Audit would be necessary because their alleged self-righteous motives to be “as pure as the driven snow” would satisfy. Defendants much later admitted to Plaintiff that the Senior Pastor did not believe in reporting the fact that the Corporation had several bank accounts so this committee making a statement that “that is when each and every check was written out of the church and the school for the entire year ending June 30, 1995, was looked at by at least one of the five Finance Committee members.”, may or may not have been true if the Total Committee was not privileged to know about unreported bank accounts.

154-57-STRIKE

158. At the time Defendant made the representations herein alleged Defendant had superior and exclusive knowledge of these unreported funds because the Senior Pastor Ron Beck intended to keep secret accounts for use in the special projects and not report these accounts being used by deceptions.

159-61-STRIKE

162. At all times herein mentioned, defendant RONALD L. BECK, was the agent of Defendant First Baptist Church of Citrus Park, and in doing the things herein alleged was acting within the course and scope of such agency and with permission and consent of his codefendants and with the authority for the Defendant First Baptist Church of Citrus Park and Membership.

163. On or about January 23, 2000, defendant Ronald L. Beck, falsely and

fraudulently represented to Plaintiff that the FBCCP BY-LAWS stated “First of all our bylaws state that every motion of active business to be conducted in any regular scheduled business meeting must be in writing.”

64.-70. {STRICKEN}

COUNT VI
MALICIOUS PROSECUTION

171. Plaintiff, Randall Townsend, Pro Se, sues the Defendant, RONALD L. BECK, individually, and in his Official capacity as REVERAND RONALD L. BECK, SENIOR PASTOR OF FBCCP, and sues DEFENDANTS AS MEMBERS AT LARGE OF FBCCP AS NOTED HERIN AND OTHER TO BE NAMED AS DISCOVERY IS JUST STARTING AND WILL CONTINUE IN capacities as stated above herein in the Corporation known as First Baptist Church of Citrus Park and Plaintiff sues THE CORPORATION KNOW AS First Baptist Church Of Citrus Park.

172.This is an action for damages that exceed \$25,000.00.

173.Plaintiff is a citizen and resident of Hillsborough County, at all times material hereto, and resides in Hillsborough County. These Defendants all reside in the State of Florida and held positions of Officers of Defendant First Baptist Church of Citrus Park. Defendant First Baptist Church of Citrus Park is a Florida Corporation, duly licensed and organized under the laws of Florida, whose main office and doing business at 7705 Gunn Highway, Tampa Florida.

174.Plaintiff re-alleges all above points herein as proof of “OUTRAGEOUS AND ODIIOUS” 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 THESE CITIZENS OF HILLSBOROUGH COUNTY.

175. On or about NOVEMBER 2, 2001, the Defendant RONALD L. BECK INDIVIDUAL AND AS IN HIS OFFICERS POSITION AS SENIOR PASTOR OF THE FBCCP AND AS THEIR ELECTED REPRESENTATIVE BY HIS OWN STATEMENTS PRESENTED BY HIS OWN WORDS TO JUDGE PALOMINO commenced civil proceeding against the Plaintiff by filing with the Clerk of this Honorable Court, a Complaint, with Exhibits attached, a copy of which is attached hereto and made a part of hereof by reference as EXHIBIT FOUR.

176. A summons was also duly issued by the Clerk of this Honorable Court, and was served, together with a copy of the Complaint and Exhibits thereto, on the Plaintiff and the Defendants in this present action. Moreover, that litigation was prosecuted to its conclusion in this Court by the Order as attached Exhibit FIVE.

177. On November 2, 2001, when the Complaint referred to in the paragraph above was filed, the Defendant RONALD L. BECK individually, and in his capacity as SENIOR PASTOR OF THE CORPORATION OF FBCCP AND DEFENDANTS AT LARGE OF THE FBCCP AS THEY AGREED TO SUPPORT DEFENDANT BECK IN HIS ACTION AS INDIVIDUAL AND SPOKE FOR THEIR CAUSE INTENTIONALLY CREATED herein knew that the allegations contained in the Complaint were false and untrue; that the action was brought without probable cause; and further, that the action was instituted and prosecuted with malice and without any reasonable probability of success. Furthermore, the actions by Defendant was an attempt to fraud the Court with granting a "Stalking

Order” so to bar Plaintiff from investigation process and exposing facts to other FBCCP Corporation members and to the other churches and to the general public that exposed the Deceptions by Defendant Ron Beck individual and other Church officers and their own personal attacks against this plaintiff and his family acted against as hate crimes. **Defendant Ron Beck in the Complaint**

did write two fraudulent facts to the Judge to induce a “TEMPORARY INJUNCTION FOR PROTECTION AGAINST REPEAT VIOLENCE” case

file # 01-15183, Hillsborough County, Florida. However, notwithstanding these facts, the Defendant signed this Complaint and caused it to be filed with the Clerk of this Court and served on this Plaintiff in this present action. These acts were performed by the Defendants with the intent to injure the Plaintiff, and to bring his good name into public disgrace and disrepute, and with the further intent to with the “Stalking Order” prevent Plaintiff from coming to the FBCCP Corporation and exposing to the members the frauds and deceptions of Ron Beck, Defendant and the others named above herein and continue his frauds to Plaintiff’s wife that Plaintiff was “dangerous”, that the action was filed with the specific and malicious intent on the part of the Defendant **to coerce the Court with fraud** from his testimony and from witnesses Ron Beck tried to call who intended based on subsequent testimony intended to give false information to the Honorable Judge Palomino to induce him to grant a “stalking order” and to further keep Plaintiff from speaking to the FBCCP Corporation where Plaintiff was a member in good standing and holding the offices as in POINT (12) above herein until the Fraudulent statements and Fraudulent actions were started by this

Defendant when Plaintiff was attempting to report to the Members the false business statements and other misrepresentations by Reverend Ron Beck and others herein. NOTICE of the issues of his improper actions are contained above herein and incorporated herein this count.

178. The civil proceedings filed by Ronald L. Beck and for FBCCP commenced on November 15, and terminated with the entry of this summary final judgment in favor of the Defendant therein, the Plaintiff here, a true copy of which is attached here to as Exhibit SIX and it incorporated herein by reference.

179. The Plaintiff thereby contends that, in light of all facts as itemized and confirmed above, the original action brought against the Plaintiff here was (1) brought by the party that is the Defendant(s) here; (2) found to be without probable cause; (3) instituted with malice; (4) terminated in favor of the Plaintiff; and (5) found to be the action for which the Plaintiff has suffered injuries and damages.

180. Moreover, the Defendants here is unable to establish that the original proceeding was instituted and prosecuted on the good faith reliance of legal counsel; or, that the proceeding was instituted pursuant to an independent investigation by a responsible attorney of law, licensed to practice in the state; or that the Defendant is or represents, or is and agent of, a public entity or state agency that is immune from liability for causes of action in tort.

181. The circumstances under which the above-described acts were committed by Defendants constitute a wanton and reckless disregard for the Plaintiff's legally protected rights and interests, and a willful attempt to injure the Plaintiff.

182. By reason of both the false Complaint executed and filed with malice, and attempted extortion and frauds, and a direct intent to injure the Plaintiff as noted above, the Plaintiff's reputation to his family and in the community where he lives and worked and served in many civic functions has been irretrievably damaged, and the Plaintiff has been humiliated, frightened by his coercion with Sheriff Deputies on multiple occasions including the April 27, 2000, Deacons meeting where defendants Beck, Leatherman and Howlett alleged Plaintiff was a violent man and a liar, shamed, and intimidated, and again in July 2001, and by multiple traffic stops by Deputy Joe Howlett when Plaintiff was not in violation of any laws and followed on two occasions and abused even at toll booths and at the public mall and at the public post office and restaurants and has suffered great duress in watching William Brown multiple times put at risk the health of many minor children and in July, 1999, violate by an immoral act upon Plaintiff's now former wife, yet Plaintiff was called the liar for reporting such act and Plaintiff has suffered great mental pain thereby as Plaintiff was forced now for many years to watch the pain and suffering these officers and members at large as Doctor Lynn and these Sheriff Deputies Howlett and Jeffers professional actions were allegedly a cover for their own criminal acts as these conspirators do daily to destroy this family and the lives of these people and this plaintiff as they still conspire to put more people at risk who do not follow the wishes of Ron Beck and his pastors. PLAINTIFF BECAUSE OF THE LIES STARTED BY RON BECK HAS NOW NOT BEEN ABLE TO SEE OR SPEAK TO HIS KIDS SINCE LATE 2002, BECAUSE OF THE LIE THAT PLAINTIFF IS VIOLENT AS THE

ACTION FILED BY RONALD L. BECK FOR HIMSELF AND THE CHURCH WAS USED EVEN OUT OF CONTEXT BY ATTORNEY FOR THE WIFE IN THE DIVORCE CASE TO JUDGE TIMMERMAN WHO RATHER THAT SHOW PROPER JUDICIAL PROCESS INSTEAD TOOK THE LIES OF STACEY TURMEL AND DID USE HER POSITIONS ON THE BECK ACTIONS AS A WAY TO ALL THE MORE HARM AND DAMAGE THIS PLAINTIFF/HUSBAND/FATHER.

Moreover, the expense of defending against the lawsuit, both in this Court and in the District Court of Appeal, has been incurred on behalf of this Plaintiff, and the health of this Plaintiff and of the Plaintiff's spouse, children and parents and family and others has been damaged and the future expenses of trying to repair the mental duress by professional counselors that will be needed to restore this families relationships destroyed by the years of frauds by these alleged pastors.

183. WHEREFORE, the Plaintiff demands trial by jury on all issues so triable and prays this Court will award damages against Defendants, Ronald L. Beck, individually, Reverend Ronald L. Beck as senior pastor of First Baptist Church of Citrus Park and First Baptist Church of Citrus Park, Inc. including court costs, and any other further relief as the Court may deem proper.

184. Plaintiff Townsend alleges that by Defendants Beck, Meister, Karen Harrod Townsend, Leatherman, Jeffers, Howlett, Geoff Smith, Corbin, Schumate, Bates, Rawls, Brown, Grant, Gibbs, Gardner, Scruggs, Gray, Denny, Rolfes, Deacons, Trustees, School Board Members, Long Range Planning Members, Finance Members and other deceptions of attorneys listed herein and as "DOE" and Judges named herein knowingly using

intentional, negligent, and recklessness to miss use State Laws, Federal Laws, Rules of Law per Judge Crenshaw, as done by Turmel, Solomon and each Judge Named above herein and failure to Honor the FBCCP Contract known as the BY-LAWS that the Plea of Plaintiff Townsend to “show me the money” and “Stop the Schism building scheme frauds” has been delayed and allowed allegations by Townsend to be ignored, and recklessly and negligently handled by all Defendants as named above and herein despite that Townsend has followed the RULES OF the BY-LAWS and RULES OF LAW and CASE LAW in trying to OBTAIN DISCLOSURE, PROTECTION, AND A STOPPAGE OF DAMAGES BY EACH DEFENDANTS RECKLESSNESS AND TORTS and each Defendant has been duly noticed, warned and advised on True By-Laws and Legal Process and however continue their torts against these Plaintiffs still being damaged to this day and thereby became a joint tortfeasor violating the Rights of Plaintiffs herein.

185. Plaintiff Townsend alleges that Defendants JOE PALKO, Individual, JOE PALKO, EMPLOYEE AS Vice President (Kmart) SEARS HOLDING COMPANY, RANDY BRIGHT, Individual, RANDY BRIGHT, (Kmart) EMPLOYEE AS REGIONAL COACH, KEITH JOHNSON, Individual, KEITH JOHNSON, (Kmart) EMPLOYEE AS REGIONAL HUMAN RESOURCES DIRECTOR, SHANE PEARSON, Individual, SHANE PEARSON, (Kmart) EMPLOYEE AS LOSS PREVENTION DISTRICT COACH, KATHERINE CUNNINGHAM, Individual, KATHERINE CUNNINGHAM, (Kmart) EMPLOYEE AS DISTRICT COORDINATOR SECRETARY, DANIEL J. GENTILE, Individual, DANIEL J. GENTILE, (Kmart) EMPLOYEE AS DISTRICT COACH, DOUG LIVINGSTON, Individual, DOUG LIVINGSTON, AS KMART EMPLOYEE LOSS PREVENTION COACH, AT STORE 3092, ROY ALLEN,

Individual, ROY ALLEN, KMART EMPLOYEE AS ASSISTANT COACH, AT STORE 3092, DR. LINDA ROWE CAMPBELL, Individual, DR. LINDA ROWE CAMPBELL, (Kmart) EMPLOYEE AS PHARMACIST AT STORE 3092 BARBARA BOOTH, Individual, BARBARA BOOTH, (Kmart) EMPLOYEE AT STORE 3092, as individuals and as Kmart/Sears employees, agents and supervision and knowingly, intentionally, recklessly and negligently did frauds and omissions of truthful disclosure in violations to this Plaintiff Townsend as an employee of KMART/SEARS Holding as retaliations of Plaintiff Townsend as a “Whistle Blower” of illegal activities of these individuals and of the Corporations and as violators of Plaintiff’s religious rights and freedoms and civil rights and freedoms violations including race, religion and other civil rights and thereby the Corporation of KMART/SEARS HOLDING INC. is vicariously and directly responsible and liable under the law for all actions of all Defendants as retaliations against Plaintiff Townsend and responsible for damages incurred by Plaintiff Townsend as stated herein and per all laws for the protection of this Plaintiff Townsend and those who Plaintiff Townsend attempts to represent and serve.

186. Plaintiff Townsend states that Defendant Roy Allen on or about October 6, 2005, did admit and apologize to Plaintiff Townsend that he never meant for his plan with Defendant Dan Gentile to get Roy Allen his own store would lead to sabotage and the termination of Plaintiff Townsend but that Dan Gentile had betrayed him also but it was too late to change things as Roy Allen with Doug Livingston, Barbara Booth and others had knowingly, intentionally, recklessly and negligently given false statements and omitted truthful disclosure against this Plaintiff Townsend.

187. Plaintiff Townsend also alleges that Pearson and Gentile, Livingston, Allen,

Booth, Rowe-Campbell and Bright and did knowingly, intentionally, recklessly and negligently conspire and omit truthful disclosure of Plaintiff Townsend to management in verbal reports, written reports and store condition visit reports and of Plaintiff Townsend decisions and management style and skills being done for the showing of Reasonable Duty to the KMART SEARS CORPORATION as a disguise of frauds and negligence and tort conduct of Pearson, Gentile, Livingston, Allen, Booth, Rowe and Rick Gould and others and at times the directives of Pearson and Gentile were illegal, intentionally conspired fraud, extortion and breach of KMART SEARS CORPORATE POLICIES and violations of federal and state and county and city laws and policies these intentional actions by Pearson and Gentile caused violations of civil rights of Plaintiff Townsend and his termination of employment and damages to Plaintiff Townsend reputation, character and opportunities for future employment and well being as stated herein.

COUNT I

BREACH OF DUTY –FRAUD BASED ON PROMISE MADE WITHOUT INTENT TO PERFORM—AGAINST DEFENDANT RONALD BECK, Individually, and in his Corporation officer capacities as in the Corporation known as the First Baptist Church of Citrus Park and against the Corporation d/b/a the First Baptist Church of Citrus Park

188. Plaintiffs re-allege all points above and below and incorporates them herein.

189. Comes Now Plaintiff Randall Townsend and sues Defendants Beck, individually,

Beck as Senior Pastor and Beck as Officer of the Corporation(as Beck) and states:

190. On or about August 1999, Defendants Beck falsely and fraudulently represented

that he “was concerned about the Plaintiff being in leadership” due to the

allegations he had allegedly learned from his employee, Karen, the wife of Plaintiff

Townsend. Defendant Beck stated that “ he intended to be our marriage counselor

while we worked through our problems” Also he said he intended to get us together to meet with him after he returned from his vacation to Jeckyl Island, Georgia on or about the next week.

191. The above representations made by Beck were in fact false. The true facts were:

Ronald Beck later in September 1999, said he forgot he made the promise to set up the appointment when he returned from his vacation and Ronald Beck later said he never intended to mediate any marriage problems. Ronald L. Beck than later said he was too busy to keep an appointment he arranged with Plaintiff and Plaintiff’s wife now separated due to his repeated threats and false charges against Plaintiff, because he had to go on another vacation(a cruise) and was too busy with his family at the holidays to keep the appointment he claimed he tried so hard to arrange so all parties could allegedly sit down and “clear up all these little misunderstandings”.

Further, upon full disclosure of the FBCCP and Corporation Credit Card Statements of Ronald Beck as Plaintiff Townsend demanded so to clear up the marital extortion used by the Schism that the facts reveal that exposure of the frauds contained in said documents now revealed until June/July 2006, as shown herein, Plaintiff alleges would not and then could not have been used to continue the extortion, conspiring, deception and control over the alleged “irreconcilable differences” of the marriage and thereby the Scheme of the Schism Beck controlled would have been exposed thus not allowing Beck and the others of the Corporation alleging to be Honorable Officers to not continue their frauds and omissions of truthful disclosure to all.

192. Defendant Beck made these representations knowing them to be false and with the intent to defraud and deceive this plaintiff and plaintiff’s wife and Church Members

of the Corporation into thinking he had a pastoral superior perspective view that he was not able to reveal to the Corporation of Members, the any and all details of Plaintiff's in his view allegedly integrity issues which caused Beck to remove Plaintiff from all positions of leadership on September 8, 1999. This false reliance was his cover of darkness to induce deceptions to Plaintiff and Plaintiffs wife and children and to allow "deception to the Corporation members to be fearful of Plaintiff that Plaintiff was dangerous to anyone". And Defendant Beck, until his letter of July 26, 2001, and filing his petition to the Court of Judge Palomino had only revealed to Plaintiff that if Plaintiff Came to the Church or School property and tried to tell people the truth that Defendant Beck said he would have Plaintiff arrested on whatever charges he could create so people could not hear Plaintiff's "side of the two way street". Therefore, Plaintiff feared arrest even just trying to pick up his minor children from school or church if Defendant Ron Beck desired additional retaliations to assist him keeping his frauds and deceptions ongoing or needed another episode with which to distract members from the facts.

193. Plaintiff, at the time up until September 8, 1999, defendant made the above misrepresentations and at the time Plaintiff took the actions herein alleged, was ignorant of the full falsity of defendant's misrepresentations that he was innocent of trying to intentionally destroy Plaintiff and believed them to be true. In reliance on these representations, plaintiff was induced to and did underestimate the level of corruption of corporation funds not being reported and did underestimate the schism as persons involved in helping Defendant Beck to manipulate the reporting of Corporation assets and collecting of funds and of other frauds to the Corporation

and Plaintiff did underestimate the extent that proving Defendant Beck and the others were guilty in their schemes would have on the destruction of Plaintiff's good name and on the destruction of the marriage of Plaintiff and the separation and destruction of the relationship Plaintiff would have with his own children. Plaintiff's reliance on defendant's representations was justified because of the concealment's and previous representations by Defendants that the errors of the Business Meetings were unintentional errors or mistakes and due to the fact the full coercion of pastors, finance committee members and trustee's had not yet been exposed and due to the fact that this Defendant represents himself to a highest standard as a Pastor and thereby the Defendant FBCCP Corporation, extended, supported, approved and did not conduct themselves per the §617 Florida Statutes nor per the FBCCP BY-LAWS and did intentionally, knowingly and recklessly and willingly give "Benefit to Clergy" in violation of the BY-LAWS.

194. As a direct and proximate result of defendant's fraud and deceit, plaintiff has sustained financial, emotional, damages to his reputation, loss of his family and has now not had a relationship with or seen his children for many years due to the frauds of Beck allegedly as a "Clergy" and suffered battery and multiple other damages yet to be fully determined.

195. Wherefore, plaintiff demands judgment against Defendant Ronald Beck, individual, Ronald Beck as Senior Pastor and the Membership at Large of the FBCCP and the FBCCP Corporation.

- A. For General Damages
- B. For the following special damages for emotional distress and
- C. For the pain and suffering of losing Plaintiff's relationship with Plaintiff's wife

- and children due to the frauds specifically told by Defendant Ron Beck representing himself as a marriage counselor and
- D. For the damages to Plaintiff's good name and reputation.
 - E. For the costs of suit incurred in this action.
 - F. For the loss of Plaintiff Odessa Florida Home
 - G. For Compensatory Damages
 - H. For the loss of Plaintiff Townsend's employment and loss of earning opportunity
 - I. For Punitive Damages
 - J. For any and all legal and attorney fees.
 - K. For such and other further relief as the Court may deem proper.

COUNT II

BREACH OF DUTY—FRAUD BASED ON PROMISE MADE WITHOUT INTENT TO PERFORM—AGAINST DEFENDANT GARY LEATHERMAN, Individually and in ALL his Corporation Officers capacities and First Baptist Church of Citrus Park as the Corporation of the First Baptist Church of Citrus Park and Membership at Large and of the First Baptist Church of Citrus Park as a Corporation.

196. Plaintiffs re-allege all points above and below and incorporates them herein.

197. Comes Now Plaintiff Randall Townsend and sues Defendants Gary

Leatherman,(Leatherman) individually, and Leatherman as Officer of the Corporation in all positions as stated herein (as Leatherman) and First Baptist Church of Citrus Park as the Corporation of the First Baptist Church of Citrus Park and Membership at Large states:

198. At all times herein mentioned defendant Leatherman was the agent of Defendant First Baptist Church of Citrus Park and in doing the things herein alleged was acting within the course and scope of such agency and with permission and consent of his co-defendant and with the authority for the Defendant First Baptist Church of Citrus Park and Membership at Large.

199. On or about July 28, 1996, quoting from a FOURTH QUARTER BUSINESS MEETING, member Jim Bates speaking collectively for several members including this Plaintiff asked: "Are there any changes that came out of this review that could

be recommended by the Finance Committee in the way we are presently doing business in our Church finances.”

200. Defendant Gary Leatherman, individual, and speaking in his Official capacity as Chairman of the Finance Committee, speaking for the Committee and the Pastors as members of said committee said:

“Yes sir, there were many that had come up. Some were adopted. Some were rejected, and some were still under discussion. That one that comes to mind right now; the things we want to do differently on casual labor, on how we count for casual labor. We are showing up some of the record keeping of that because we want to make sure that we are pure as the driven snow in the eyes of the IRS. In that area we made some changes. In others we were still discussing on different ways of doing things. We know it will take a while before we come to a conclusion on just what is the optimum way. We do not want to burden the staff, but we also want to make sure that in the eyes of any body outside that is looking at our congregation, that is looking for reasons to not let us keep our tax-exempt status, that we are pure as the driven snow.”

201. At the time the defendant made the above representation to plaintiff, defendant was aware but did not inform plaintiff that his motives were not come as clean “as pure as the driven snow” nor did Defendant intend to fully report all funds in a “detailed and comprehensive report of all receipts and disbursement, balances, etc.” based on the guidelines and timelines in the FBCCP BY-LAWS but later actions by Defendant showed he was a participant in the non-disclosure of the true full financial records and that Gary Leatherman assist others to conceal rather than reveal the true total financial records as the BY-LAWS required. This concealment of facts lead to conspiracy by Beck, Brown, Leatherman, Jeffers and Meister to deceive the Corporation (church/school) members into additional fraudulent actions.

202. The suppression of the fact that Defendant Gary Leatherman was willing to hide key financial information was likely to mislead plaintiff and did in fact mislead plaintiff in the light of the other representations by defendant concerning later discovered miss-uses of the funds by the Pastors and that Gary Leatherman later alleged he **also** was road-blocked victim by the Pastors and thus could not report correctly the true financial records of the Corporation.

203. Defendants suppress this information with the intent to induce Plaintiff to confide in his leadership implying he wanted to align with Plaintiff to induce the proper information being allegedly withheld by the Pastors solely not only from the Corporation but also from the men on the Finance Committee. This suppression gave false information to this Plaintiff and thus created a false trust and then allowed Defendant Gary Leatherman to allegedly claim he was able to be an unbiased participant in the Personal Committee who was assigned in January 2000, by Ron Beck to assist Plaintiff investigate the charges of Plaintiff. This suppression of key information is a basis for proof of a conspiracy to continue to keep the true financial misuses not just of the Pastors not exposed to the Plaintiff and the Corporation but to keep one from learning that the Finance Committee was also part of keeping the entire funds from the Corporation members from being revealed so to escalate their giving to the general fund and to the Building Project in order to keep other members from even listening to the allegations of this Plaintiff.

204. Plaintiff, at the time these failures to disclose and suppression of facts occurred and at the time plaintiff took the action herein alleged, was ignorant of the existence of the facts that defendant suppressed and failed to disclose. Had plaintiff been aware

that Defendant Gary Leatherman had not disclosed to the Corporation in the Business Meeting that he was also not truly part of the conspiracy to not report Quarterly all of the Corporation funds held in secret, and or the acts of misuse of funds by the Pastors, Plaintiff would not have agreed to communicate private information to defendant Gary Leatherman to his repeated commitment to be “as pure as the driven show” and allow Gary Leatherman to have any contact as a mediator to Plaintiff’s family or any other member of the Corporation as he allegedly was speaking 100% the total words of the Plaintiff.

205. At the time Defendant made these representations herein alleged, a confidential relationship existed between Plaintiff and Defendant because Plaintiff understood that the process in the FBCCP CONSTITUTION AND BY-LAWS to Plaintiffs as a fellow member and Defendant agreed to assist Plaintiff in a proper investigation of the violations by the Pastors.

206. At the time Defendant made the representations herein alleged, Defendant had superior knowledge that he was an active participant in keeping information hid from Plaintiff and from the Corporation that the financial records presented to the Plaintiff and Corporation were in fact not complete for years as part of a scheme to raise more funds for the building program and other fund raising ventures and or be dipped into without getting approval from a specific governing committee and misapplying of designated funds.

207. Because of the Defendants superior and contractual relationship and Defendants superior knowledge, Defendant had a DUTY to make a full disclosure to Plaintiff of all facts material herein due to Plaintiff trusting Defendant was to be true to his

words to always be “as pure as the driven snow” in keeping safe the Plaintiff’s family from the fraudulent attacks by the Pastors while Plaintiff tried with the help of Defendant Gary Leatherman to allegedly investigate the violations by the Pastors for the Congregation and Defendant had a duty to disclose the fact that he was actually not willing to enforce the CONSTITUTION and BY-LAWS and produce the full financial records for the Congregation and as to how he had contributed to the frauds. **PLAINTIFF would then not have trusted Gary Leatherman during the very delicate time of August 1999, to April 2000 and not have been shocked and surprised by the betrayals by Defendant Gary Leatherman when he turned publicly against Plaintiff Townsend in April 2000, and would not have allowed Defendant to be a trusted confidant between Plaintiff and Plaintiff’s family and other friends or other members of FBCCP and or the Corporation allegedly acting as an honorable Church and School thereby the Defendant FBCCP Corporation, extended, supported, approved and did not conduct themselves per the §617 Florida Statutes nor per the FBCCP BY-LAWS and did intentionally, knowingly and recklessly and willingly give “Benefit to Clergy” in violation of the BY-LAWS and other State and Federal Laws stated herein all paragraphs and now incorporated herein.**

208. As a direct and proximate result of Defendants fraud and deceit, Plaintiff has suffered loss of Plaintiff’s family and marriage, financial damages, emotional distress, slander, defamation to Plaintiff’s character and tremendous abuse to Plaintiff’s integrity and battery and possibly un-repairable without vindication through this lawsuit.

209. WHEREFORE, plaintiff Townsend demands judgement against Gary Leatherman, individual, and the First Baptist Church of Citrus Park Membership at Large and as members named in this full complaint and the Corporation of the First Baptist Church of Citrus Park as follows:

- a. For General Damages
- b. For special damages due to the loss of Plaintiff's family relations and damages to plaintiff Townsends reputation and good standing in the community and in Plaintiff's emotional pain and suffering due to these losses
- c. For Compensatory damages
- d. For cost of this suit incurred in this action
- e. For such other and further relief as the Court may deem proper.

COUNT III

BREACH OF DUTY –FRAUD BASED ON PROMISE MADE WITHOUT INTENT TO PERFORM—AGAINST RON BECK; WILLIAM BROWN; HERMAN MEISTER; GARY LEATHERMAN; TIM JEFFERS; JOE HOWLETT; MIKE SHUMATE'; MARK NUNES; ROBERT GILES; GEOFF SMITH; individually and in their Corporation Officers capacities as stated and the CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK

210. Plaintiffs re-allege all points above and below and incorporates them herein.

Comes Now Plaintiff Randall Townsend and sues Defendants RON BECK; WILLIAM BROWN; HERMAN MEISTER; GARY LEATHERMAN; TIM JEFFERS; JOE HOWLETT; MIKE SHUMATE'; MARK NUNES; ROBERT GILES; GEOFF SMITH; individually and in their Corporation Officers capacities as stated and the CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK and states:

211. On or about at various times, Defendants falsely and fraudulently represented that all Corporation assets and funds and income and expenses were being properly reported per the Florida Statutes and Church By-Laws legal duty and process.

212. On or about at various times, Defendants falsely and fraudulently omitted truthful

disclosure as to the General Accounting Process of the Officers of the Corporation and themselves and presented their superior knowledge with intent to induce Plaintiff to blindly trust their alleged “pure as the driven snow” honesty and integrity in all matters of their leadership and thus Plaintiff would not need to investigate any allegations of mishandling of funds or misappropriation of corporate opportunity.

213. On or about at various times Defendants empowered and retained the services of themselves and allegedly outside C.P.A companies or other attorneys and hired experts to investigate and advise the uses of all Corporation Funds but the Records production of June/July 2006, revealed multiple years of frauds, mishandling of Corporate opportunities, intentional frauds to the General Voting Members wrongly conveying and then applying the alleged findings of these outside financial experts causing Plaintiffs to incur loss from these false reports and false schemes to defraud.

214. Plaintiffs allege that these inducements and actions were frauds and omissions of truthful disclosure and as a result Plaintiffs were damaged thereby as reported and alleged herein.

215. As a direct and proximate result of defendant’s frauds, deceit, and omissions of truthful disclosure, plaintiffs has sustained financial damages and battery thereby.

216. WHEREFORE, Plaintiff Townsend demands an Immediate Injunction be granted barring Beck, Meister, Smith, Howlett, Jeffers from any and all illegal violations of law and that an independent accountant be immediately assigned to review all FBCCP and CPCS Corporation Records and all private and personal records of all

employees named herein this full complaint and judgement against Defendants and each of them as follows:

- A. For General Damages
- B. For Special Damages for the loss of Plaintiffs relationships with his wife and children and slander of reputation and defamation of character
- C. For the cost of suit incurred in this action
- D. For such other and further relief as the Court may deem proper.
- E. For restitution of all lost assets of Plaintiffs and loss of employment and loss of employment opportunities
- F. For Punitive, Compensatory, Nominal damages
- G. For any and all attorneys fees and court costs.

COUNT IV

INTENTIONAL MISREPRESENTATION OF FACT—AGAINST RON BECK, individually, and as Corporation Officer as stated above herein and the CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK

217. Plaintiffs re-allege all points above and below and incorporates them herein.

218. Comes Now Plaintiff Randall Townsend and sues Defendants Beck, individually,

Beck as Senior Pastor and Beck as Officer of the Corporation(as Beck) and states:

219. On or about January 23, 2003, Defendants Beck falsely and fraudulently

represented the contents of the FBCCP BY-LAWS and stated:

“Okay. I am bound by the bylaws of this church to tell you first of all that we in no way can take action on your motion this evening. First of all our bylaws state that every motion of active business to be conducted in any regular business meeting must be in writing, So as your pastor, I would encourage you, as a member of this Church to put in writing what you just shared and I would encourage you to make it submitted to the Personnel Committee. This is obviously a personnel problem.”

220. Moderator Beck went on to say, If the pastor or the pastoral staff have accused you

falsely and can no longer help you then it is a matter that they as a body need to review.”

221. The above representations made by defendant Beck herein were in fact false. The

true facts were: the BY-LAWS herein make no requirement that all motions be in writing and per the,

“BY-LAWS ARTICLE V. SEC 4. BUSINESS MEETINGS (e) All members of the Church shall be entitled to vote in the Church business meeting—each member being entitle to one vote. Any member may make motions, or discuss motions, upon recognition of the Moderator. All motions from the floor, unless deemed necessary by the Moderator, must be referred to the proper committee for consideration and presented for action at the next business meeting....”

222. The above representation made by defendant Beck herein was to prevent Plaintiff Townsend making an immediate motion that Beck and others immediately resign as for all reasons as stated and invoked herein this complete complaint in all paragraphs and Beck and the Schism knowingly, intentionally, recklessly and negligently giving the alleged pastors “Benefit of Clergy” and violation of the BY-LAWS as a means to continue the frauds of Beck and the Schism and that by further revealing of the FBCCP Corporation records, Beck intended fraud by this action knowingly and intentionally allowing Gary Leatherman to continue manipulations and frauds to the Personnel Committee as admitted by Committee Chairman Jim Leahy, Deacons as admitted by Chairman Mike Shumate, Finance Committee as revealed by the produced Business Meeting and Credit Card Statements in June/July 2006, School Board as revealed by the failure to obtain the Special Use permits for the 18105 North Gunn Highway property and to the General Voting Members by the full reports of the Business Meeting Minutes Of Quarterly and Annual Reports revealed and these still concealed and these Plaintiffs Herein still being deceived of misappropriation of corporate opportunity and frauds and omissions of truthful reporting of all corporation assets as required by the By-

Laws and Florida Statutes and by the false allegations filed against Plaintiff Randall Townsend in the General Church Meetings and the Special Called Business Meeting of April 30, 2000, and by the false and fraudulent Criminal Charges filed and pled before Judge Palomino on November 15, 2001.

223. Defendant made these presentations knowing them to be false and with the intent to defraud and deceive plaintiffs and to induce plaintiffs to shut up at the time and to act in the manner alleged herein in order to continue Beck's and others as Pastors and Leatherman and Trustees conspiracy to those who he would name to be on the alleged investigation committee against other naïve members of the Corporation allowing those in the conspiracy to keep illegal acts from being discovered as Plaintiff Townsend had been blocked and deprived from attending the previous Quarterly Meeting and nor receiving the Quarterly Meeting Reports and Handouts which just revealed in June/July 2006, in partial production of records per the Court ORDER of Marva Crenshaw, which now reveal and prove the Corporation Officers thefts, frauds and Breach of Duty and Contract violation and violations of Civil and Criminal and IRS LAWS and therefore the MOTION for RESIGNATION or CHURCH GENERAL MEMBERS VOTE COULD HAVE BEEN DEMANDED ON JANUARY 23, 2003 as Beck and Other Officers as alleged Officers of the Corporation feared from the honorable truth seeking member in official duty as the NOMINATIONS COMMITTEE MEMBER and LONG RANGE PLANNING COMMITTEE CHAIRMAN AND AWANA COMMANDER would have the authority and power per the BY-LAWS to Demand a VOTE of RECALL or TERMINATION due to the financial mismanagement in addition to the frauds and

abuse to the Plaintiffs children and other children and the frauds of the buying and allegedly moving the Church and School to the new 18105 North Gunn Highway property which these pastors were told in 1997, by this Plaintiff Townsend not to buy the property until we had approvals and permits for the total project.

224. In further point to the deceptive practices of Defendant Beck and his ability to fraud over the facts, as Plaintiff Townsend had been promoting that the Business Meeting financial reporting had been flawed and Gary Leatherman had just noted for the record in January 23, 2000, that there had been flawed information reported in the previous October 1999, Business Meeting which was in concert with Plaintiff's tracked ongoing investigation and inquisition of the Administrator William Brown having had reported to Plaintiff that he still had "secret accounts" in August 1999. Yet Defendant Gary Leatherman and Defendant Ron Beck and did not address the "why" of the reporting error but instead using his deception refused to let Plaintiff continue to ask questions and put Plaintiff in fear of being arrested for asking questions the Moderator Ron Beck may think put him on the spot or might trap him as an accomplice to the deceptions and keeping secret funds as approved by Defendant Ron Beck and as further shown in actions of conspiracy, fraud, extortion and omissions of truthful disclosure and misappropriation of corporate opportunity by the April 30, 2000, Business Meeting Report as stated herein this full complaint and with discovery materials not yet produced.

225. At the time Defendant made the false representations alleged in this complaint, a fiduciary relationship existed between Plaintiff and Defendant because Defendant was acting as Pastor and Chief Executive Officer per the By-Laws, moderator of the

Business meetings allegedly to be Orderly and truthful regarding all facts and per Roberts Rules of Order and By-Laws. Defendant owed Plaintiff a duty not to misrepresent his opinion of the contents of the BY-LAWS procedures and not misrepresent that a proper investigation would take the proper course ethically as had been advised. Now since the charges made in 1999 and thereafter have been proved by the Court to be in favor of this Plaintiff, this Plaintiff can only pursue this lawsuit as a means for redress of the false charges against him made by the Pastors and Finance Committee who in the same meeting of January 23, 2000, admitted mistaken information was provided in the 2nd quarter of 2000, financial reports as Plaintiff investigated at that time.

226. At the time Defendant made the false representations herein alleged, Defendant had a greater superior knowledge of the Business Meeting guidelines and the BY-LAWS rules of order and the intended promise to allow the investigation to be performed without conspiring to destroy the investigation or tamper with the fact finding process by the assigning the matter to the PERSONNEL COMMITTEE and acting in concert with said members who also were persons on the Financial Committee who had reported misinformation on the 2nd quarter of 2000 Business records.

227. Plaintiff at the time defendant made the above misrepresentations and at the time plaintiff took the actions herein, was ignorant of all the falsity of defendant's misrepresentations and believed them as partly true because Plaintiff had not been allowed in the previous October 1999, Business Meeting and did not know that this stipulation may have been required and that this "Pastor" would make such an

intentional calculated obvious misstatement on the record. In reliance on the Statement of January 23, 2000, business meeting to motions must be in writing from BY-LAWS and that the committee would investigate, Plaintiff was again damaged by obstructing of justice of producing the facts necessary to clear the reputation of this Plaintiff that all of his investigation and quest for truthful information was proper per his duties by the BY-LAWS and as a State Officer with a "D" License so the membership as a whole was not deceived and battered by alleged trustees as sheriff deputies and others of law enforcement and attorneys and judges and other naïve but connived general members and employees and school parents and students who underestimated the ability of Beck and the Schism to conspire and do frauds and damaged further by the acts of the pastors and a select few concealing the actions of the schism and Karen Harrod Townsend.

228. This attempt by Plaintiff to attend Business Meetings and get factual information became the MOTIVE by Defendants Beck, Meister, Brown, Jeffers, Howlett, Leatherman and others became the collective motive for the conspiracy to have Plaintiff Townsend removed from a position of DUTY as a Member who could ask a question and was the motive the Defendant Beck sent the July 26, 2001, letter advising Plaintiff as now a non member he had no right to speak in the Business meeting or risk being arrested. In coercion, Ron Beck advised Joe Howlett, Mike Shumate and Tim Jeffers to meet Plaintiff from the front steps of the Church in July, 2001 and prohibit Plaintiff from coming into the Business Meeting solely being the one from the crowd to reveal the "Emperor had no clothes" Defendants had already intimidated other witnesses and pointed out in the January 23, 2000,

Business Meeting when others did not ask questions but let Plaintiff stand alone as they Betrayed Plaintiff and became cowards to speak out.

229. As a direct and proximate result of defendant's fraud and deceit, plaintiff suffered financial damages and emotional duress and pain and suffering and battery.

230. WHEREFORE, plaintiff demands judgement against Defendant Ronald Beck, individually, and Ronald Beck as Senior Pastor and the FBCCP Membership at Large and the Corporation of FBCCP as follows:

- A. FOR General Damages
- B. For the following special damages and the loss of Plaintiff's reputation by their conspiracy in the Defamation of Plaintiff's character so to allow them to maintain their alleged innocence to Plaintiff's investigation per his duties and for the loss of relationship with Plaintiff's wife and children and battery by law enforcement and attorneys and judges
- C. For the costs of suit incurred in this action.
- D. For emotional stress by the slander and frauds and loss of family, employment and opportunity for employment opportunities
- E. Loss of his house, home and ability to incur lost money from SunBelt Equipment Sales per the State Attorney to be at 1,000,000.00.
- F. For punitive, compensatory and nominal damages and attorneys fees and costs
- G. For such other and further relief as the Court may deem proper.

COUNT V

**INTENTIONAL RECKLESS INFLICTION OF EMOTIONAL DISTRESS—
AGAINST HERMAN MEISTER, individually and HERMAN MEISTER PASTOR
OF SCHOOL MINISTRIES OF FBCCP and the CORPORATION OF THE FIRST
BAPTIST CHURCH OF CITRUS PARK (FBCCP) and CITRUS PARK
CHRISTIAN SCHOOL (CPCS)**

231. Plaintiffs re-allege all points above and below and incorporates them herein.

232. Comes Now Plaintiff Randall Townsend and sues Defendants Herman Meister, individually, Meister as Pastor of School Ministries and Meister as Officer of the Corporation (as Meister) and the Corporation of the FBCCP and CPCS and states:

233. Defendant Herman Meister, individually, is employed as Pastor of School Ministries for FBCCP of CPCS, and the agent of the Defendant FBCCP.

234. At all times stated herein, Defendant Herman Meister (Meister) was the agent and employee of Defendant FBCCP and CPCS and in doing the things herein alleged was acting within the course and scope of such agency and with permission and consent of his codefendant.

235. On or about August 1999 through January 2002, Herman Meister promised Townsend that he would keep safe Plaintiff and Plaintiff's minor daughter per the written contracts noted in the FBCCP BY-LAWS 1992-1993 and per the CPCS HANDBOOK and obey and follow all of the rules and procedures as stated therein and Herman Meister alleged and presented himself not to be a part of the ongoing frauds and misrepresentations by Ron Beck and others against Plaintiff Townsend.

236. At the time Defendant Meister made the promise with the intent to induce Plaintiff to believe Defendant Herman Meister was an honorable man and being truthful as per the stipulations of conduct expected of the Principle/Pastor of the Christian School and Church and thereby gaining trust that Meister would keep safe Plaintiff and Plaintiff's minor daughter J.G.T and Plaintiff's wife as a teacher in the same school under his Direct Employment and supervision.

237. Plaintiff, at the time defendant made the above promise to keep safe as an honorable Principle/Pastor as directed by the Contracts of the FBCCP BY-LAWS and the CPCS Handbook and at the time Plaintiff took the actions herein alleged, was ignorant of Defendant's intention not to perform. In reliance on Defendant's promise as stated herein. Plaintiff allowed enrollment of his minor student in CPCS. Had Plaintiff known of Defendant's actual intention, plaintiff would not have taken such action of trust of Meister in his fraud and omissions of truthful

disclosure and could not be aware of the scheme and conspiracy by Meister until the revealing of the April 30, 2000, Business Meeting Records not revealed until June/July 2006 as stated in full in this Complaint in all paragraphs incorporated now herein.

238. Defendant failed to abide by his promise and instead used this deception, fraud and omission of truthful disclosure as extortion that if Plaintiff refused to drop his investigation of the proper reporting of the funds and the improper releasing of information regarding the building plans for growth of the ministry to the new property, from the pastors of the Church and School that Defendant Meister would assist and did help the Senior Pastor Beck and Pastor of Administration William Brown and the Finance Committee and Trustee Gary Leatherman, Tim Jeffers and Joe Howlett to use extortion and abuse of process and harassment as they were trying to ruin the integrity and character of plaintiff Townsend and used trickery and frauds against Plaintiff and Plaintiff's wife and Minors J.D.T and J.G.T. and others confirmed by Meister in a conversation of rage and yelled out at Plaintiff Townsend in January 2002, "WE MADE A PACK TO DENY AND TO DESTROY ANYTHING YOU SAY!"

239. Further, Defendant Herman Meister as Pastor/Principle of the school did ignore the physical trauma endured by minor daughter J.G.T and the mental anguish and the destruction of Plaintiff's family and family lifestyle as stated in the CPCS handbook as the goal of CPCS Family values and Plaintiff's reputation at the hand of his extortion schemes as the now produced in June/July 2006, FBCCP and CPCS Business Records just revealed multiple motives and acts of criminal, civil, labor,

and IRS violations by Meister as a fraud and omission of truthful disclosure to his intended purpose to deceive and cause infliction of emotional distress as a practice to induce Plaintiff Townsend to stop his pursuit of the violators of Plaintiff's rights and Meister did use his role as the employer, Pastor of School Ministries and School Board Member and Member of the LRPC Committee to promote fraud, omissions of truthful disclosure, misappropriation of corporate opportunity, extortion, conspiracy and emotional stress on all Plaintiffs and on Defendants under his employment to enable additional damages and emotional, physical, mental and financial damages by engaging by his actions Gayle Lynn, Dr. Lon Lynn and even the Mother Karen Harrod Townsend to conceal, fraud, battery and damage Plaintiff Townsend, and Plaintiff J.D.T and Plaintiff J.G.T and all minor plaintiffs for whom Plaintiff Townsend speaks.

240. As a direct and proximate result of Meisters frauds and omissions of truthful disclosure and extortion and infliction of extreme emotional distress, plaintiff Townsend and all plaintiffs has sustained financial damages, and the loss of Plaintiffs family relations with his wife and his children and the loss of his standing in the community and suffered extreme emotional and mental distress.

241. Wherefore Plaintiff Townsend demands judgement against Defendant Meister individually, Meister as Pastor of FBCCP AND CPCS and the Corporation of FBCCP/CPCS as follows:

- A. For general damages
- B. For the following special damages including medical bills past, present and future incurred from the treatments due to the mental anguish suffered by Plaintiffs and any and all other relief as deemed proper by the Court.

- C. For costs incurred in this suit and in costs from defending against all trials including cases 01-15813 and –1-15814 and other suits to overturn the resulting Injunctions flowing from the frauds and omissions of truthful disclosure of Defendants.
- D. For punitive damages.
- E. For such other and further relief as the Court may deem proper.

COUNT VII

CLAIM FOR PROFESSIONAL MALPRACTICE BREACH OF DUTY AGAINST DR. LON LYNN M.D. Individually, DR. LON LYNN AS MEMBER OF FBCCP and DR. LON LYNN, Medical Doctor for INTENTIONAL NEGLIGENCE CARE AND CAUSING INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND BATTERY

242. Plaintiffs re-allege all points above and below and incorporates them herein.

243. Comes Now Plaintiff Randall Townsend Plaintiff RANDALL TOWNSEND, Pro Se, AS AN INDIVIDUAL, AND AS “NEXT FRIEND” AND PATERNAL PARENT OF MINOR SON, J.D.T. AND AS “NEXT FRIEND” AND PATERNAL PARENT OF MINOR DAUGHTER, J.G.T, AND AS A “DIRECT MEMBER” of the First Baptist Church of Citrus Park, (FBCCP) Acting Directly, Indirectly and Derivatively AND AS “NEXT FRIEND” FOR AND OF ALL THE MINOR CHILDREN of the FBCCP and CITRUS PARK CHRISTIAN SCHOOL (CPCS), and sues Defendants DR. LON LYNN, individually, and DR. LON LYNN AS MEMBER OF FBCCP and DR. LON LYNN, Medical Doctor for NEGLIGENCE CARE CAUSING INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS **and Battery** and states:

244. At all times material hereto, Defendant Lon Lynn individual was the agent and employee of defendant Dr. Lon Lynn M.D. and in doing the things alleged herein was acting within the course and scope and authority of such agency and with the permission and consent of his co-defendants.

245. On or about September 1999, Defendants became aware of conflicts and disorders

of minor J.D.T and Minor J.G.T and Defendant Mother Karen Harrod Townsend as joint members of FBCCP and as employee and students of CPCS.

246. On or About July 31, 2000, via a phone conversation and via a personal meeting Plaintiff Townsend did also inform Defendants of special issues needed in the proper care of Minor J.D.T. and Minor J.G.T and Defendant Karen Harrod Townsend resulting from stress related circumstances caused by FBCCP and CPCS issues as stated herein and Dr. Lon Lynn personally and directly related to this Plaintiff as Parent of J.G.T and J.D. T. that he would see that the proper medical care would be given to Plaintiffs in view of the stress related symptoms he was aware of in their lives due to the FBCCP/CPCS issues.

247. On or about August 2000, after consultation with Defendant Scruggs, Plaintiff Townsend sent by Certified Mail as conditions precedent a letter advising all Defendants as Dr. LON LYNN, M.D of special needs and circumstances with issues relative or related to the care of Dr. Lon Lynn's fellow FBCCP and CPCS members and as patients J.D.T and J.G.T and the mother Karen Harrod Townsend and advised Dr. Lon Lynn of the falsely and fraudulently represented frauds and omissions of truthful disclosures that the problems of FBCCP and CPCS were causing Plaintiff J.D.T and J.G.T and others. Dr. Lon Lynn also revealed that from his wife, Gayle Lynn, as the CPCS school counselor and from his personal knowledge as a member of FBCCP and CPCS parent that he was aware of the issues and claims made by Plaintiff Townsend against Defendants Pastors and Trustees and Dr. Lon Lynn advised he was aware of the claims of the Pastors and Trustees as Deputies made about and damages to Plaintiff Townsend.

248. Plaintiff Townsend alleges that Dr. Lon Lynn from his medical training and from his alleged respected position as a Medical Doctor and with knowledge gained from the

FBCCP and CPCS HANDBOOK and personal discussions and observations with all parties that Dr. Lon Lynn, had a knowledge of the desired care and expectations required to keep safe Plaintiffs and Dr. Lon Lynn because of his training and superior knowledge had a duty to exercise his position of leadership and as member to assist and resolve and present facts and prevent damages to all Plaintiffs within his medical and leadership care.

249. Plaintiff Townsend alleges that Dr. Lon Lynn intentionally, willingly, knowingly and recklessly failed to exercise proper medical, and membership of FBCCP and CPCS DUTIES and intentionally, willfully, knowingly and recklessly desired rather to “Give Benefit to Clergy” to protect the employment of his wife Gayle Lynn as the CPCS school counselor and protect his position of FBCCP and CPCS roles and leadership positions rather than suffer loss of income, loss of clients and loss of rapport with Pastors and alleged Trustees and other members despite Dr. Lon Lynn being fully aware of the truth of the allegations and resulting damages as reported to him by Plaintiff Townsend.

250. At the time defendants made the promise with the intent to induce plaintiff Townsend to trust his wisdom and medical care as a medical professional and as a man in the community and in the FBCCP and CPCS family as member of integrity and honor and to let Dr. Lon Lynn have time to perform the proper medical treatments and to assist Plaintiff in getting his patients to counseling for their symptoms both said were evident, defendant had no intention of performing per his agreed services of care or assistance to get the facts and truth of the FBCCP and CPCS exposed and extended battery all on Plaintiffs to continue his and others concealment of frauds and benefit of clergy to continue his opportunity for financial gain and unjust enrichment for himself individually and for his Medical practice and Business and to provide unjust enrichment for his wife

as employee of CPCS/FBCCP.

251. Defendants Dr. Lon Lynn, individual and Medical Doctor and FBCCP and CPCS member made the promise with the intent to induce Plaintiff to keep quiet and stall and delay to let Dr. Lon Lynn's part in the scheme to cover up the activities and allegations of the leadership at FBCCP and CPCS continue the harms and battery against Plaintiffs.

252. Plaintiffs at the time defendants made the above promise and at the time plaintiff took the actions alleged herein, was ignorant of defendants intention not to perform. In reliance on defendants promise to assist Plaintiff to getting the Plaintiffs the truthful disclosure of allegations of the issues of the FBCCP and CPCS and the proper medical care and relief from the emotional and mental anguish and stress as victims of frauds and omissions of truthful disclosure and fears and loss of family and paternal relations, plaintiffs did suffer thereby and incurred damages and did wait and them was betrayed by Dr. Lon Lynn, when he selected and refused to discuss, and perform his intended promises to provide information and care and refused to discuss the matter further with this parent in violation of this parents right to intervention and custody and control of the medical care of the Plaintiffs as at no time during the medical care by Defendants did any court remove or restrict the permanent rights of Plaintiffs except only during the period of November 2- 15, 2001, until the Injunction by Judge Palomino was removed. As a further result Plaintiffs were damaged and thus created additional symptoms and mental anguish in the family relationships due to the betrayal of Dr. Lon Lynn as he watched the leadership at FBCCP and CPCS create additional frauds and omissions of truthful disclosure and infliction of emotional distress, battery and shame and duress on Plaintiffs.

253. In further negligence of medical care, Defendants did delay the referral of his

patients to other medical professionals as a means of keeping quiet and suppressed the anguish and duress on his patients and fellow FBCCP and CPCS members created by the issues at the hand of employees and members of FBCCP and CPCS.

254. Had Plaintiffs known of defendants actual intention, plaintiffs would not have taken such action in confidence to the alleged promise of the duty to care for Plaintiffs and would not have taken the excuses for delay and would have sought immediate care by patients original medical professional as was done by Dr. Santiago Hoyos.

255. Plaintiff Alleges Dr. Santiago Hoyos immediately alleged “wrongdoing” and “negligent” care by Dr. Lon Lynn and sought proper medical care from his own services and from the services of Dr. Ernesto Millan as reported in the medical summary reports as letters supplied as evidence in this matter to Defendants and to these lower courts.

256. Defendants failed to abide by his promise and instead got quiet and thereby did even refuse to speak to Plaintiff and thus complicated the image of Plaintiffs in the public eye to defame this Plaintiff Townsend and cause and incur additional stress on Plaintiffs due to the malicious actions of Plaintiffs FBCCP and CPCS members and peer pressure on Plaintiffs and by his non cooperation took a position to others that Plaintiff was a danger to those involved rather than as a proper parent acting with the utmost desire of love, affection and proper care for and of his family.

257. As a direct and proximate result of defendants frauds and omissions of truthful disclosure and lack of medical care, Plaintiffs suffered infliction of emotional stress, mental anguish, physical damages, pain and suffering, loss of relationships and financial damages and shame and humiliations and debt to the Corporation which failed to build the new school allegedly to serve the interests of these Plaintiffs and Dr. Lon Lynn as a

FBCCP and CPCS leader had a duty to prevent and stop the financial losses and frauds and embezzlements of the Pastors and Trustees of FBCCP and of his Medical Practice.

258. Wherefore, plaintiff demands judgement against Defendants and each of them as

follows:

- A. For general damages
- B. For the following special damages including, medical bills, loss of plaintiffs relationships, loss of plaintiffs integrity and reputation caused by defendants participation in the scheme of fraud and omission of truthful disclosure.
- C. Damages for infliction of emotional distress and battery and malpractice
- D. For the costs incurred in this suit.
- E. For unjust enrichment of his Medical Practice and of himself and his wife individually
- F. For attorneys fees
- G. For reimbursement for all FBCCP Corporation debt
- H. For punitive damages
- I. For an award against Dr. Lon Lynn M.D. and as a Corporation for negligent supervision and retention of Dr. Lon Lynn M.D. and knowingly, intentionally and recklessly and negligently allowing the actions of Dr. Lon Lynn, Individual and doing his actions of negligence in the “mask” as a Medical Doctor.
- J. For such other and further relief as the court may deem proper.

COUNT VIII

NEGLIGENT SUPERVISION---

AGAINST ALL MEMBERS AT LARGE OF THE FBCCP AND CPCS AND THE CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK AND THE MEMBERS OF THE PERSONNEL COMMITTEE AND DEACONS AND AS THE CPCS SCHOOL BOARD MEMBERS AS DEFENDANTS IN THEIR INDIVIDUAL AND IN ALL CORPORATE OFFICES AND POSITIONS AND AS ASSOCIATE GENERAL MEMBERS WITH DUTIES PER THE BY-LAWS

259. Plaintiffs re-allege all points above and below and incorporates them herein.

260. Comes Now Plaintiff Randall Townsend Plaintiff RANDALL TOWNSEND, Pro Se, AS AN INDIVIDUAL, AND AS “NEXT FRIEND” AND PATERNAL PARENT OF MINOR SON, J.D.T. AND AS “NEXT FRIEND” AND PATERNAL PARENT OF MINOR DAUGHTER, J.G.T, AND AS A “DIRECT MEMBER” of the First Baptist Church of Citrus Park, (FBCCP) Acting Directly, Indirectly and Derivatively AND AS “NEXT FRIEND” FOR AND OF ALL THE MINOR CHILDREN of the FBCCP and

CITRUS PARK CHRISTIAN SCHOOL (CPCS), and sues ALL MEMBERS AT LARGE OF THE FBCCP AND CPCS AND THE CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK AND THE MEMBERS OF THE PERSONNEL COMMITTEE AND DEACONS AND AS THE CPCS SCHOOL BOARD MEMBERS AS DEFENDANTS IN THEIR POSITIONS AS OFFICERS/AGENTS OF THE CORPORATION AND AS INDIVIDUALS for Negligent Supervision of employees Ron Beck, Herman Meister, William Brown, III and Karen Harrod Townsend and Gayle Lynn, and Paula Powell, and Tammy Nunes and April Beck and Joyce Meister and Karen Jeffers as individuals and in their official positions as individuals and employees and Associate members of FBCCP and CPCS and states:

261. At all times material to herein mentioned, Defendants Ron Beck, William Brown, Herman Meister, Karen Harrod Townsend, Gayle Lynn, Paula Powell, April Beck, Joyce Meister, Tammy Nunes and Karen Jeffers were the agents employed of Defendant First Baptist Church of Citrus Park (FBCCP) and or Citrus Park Christian School (CPCS) and in doing the things herein alleged was acting within the course and scope of such agency and with permission and consent of his codefendants and with the authority of the Defendant Corporation of FBCCP and all General Voting Members as the Membership at Large.

262. Plaintiffs allege ALL MEMBERS AT LARGE OF THE FBCCP AND CPCS AND THE CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK AND THE MEMBERS OF THE PERSONNEL COMMITTEE AND DEACONS AND AS THE CPCS SCHOOL BOARD MEMBERS were intentionally, knowingly, negligent and

reckless in the Supervision and training of each employee per the duties and standards of care and of the performance of services as stated in the FBCCP BY-LAWS, and CPCS ENROLLMENT CONTRACTS and CPCS STUDENT HANDBOOKS DUTIES AND SERVICES as stated above and below herein.

263. Plaintiff Townsend alleges that defendants were properly advised of their intentional, knowingly, reckless and negligent care and supervision by the participation of Plaintiff Townsend at the January 23, 2000, Business Meeting and by the production of multiple letters and verbal communications to advise of the negligent actions and violations of the Corporation BY-LAWS and CPCS Agreements and Contracts.

264. As an approximate and resulting cause of the negligent actions by Defendants as stated and incorporated herein Plaintiffs did suffer damages and Plaintiff alleges the Defendants “had reason to know of misconduct and did nothing to prevent reasonably foreseeable harm from being inflicted on the parishioners as these Plaintiffs” and as all defendants knowingly, intentionally, recklessly and negligently chose to “give benefit to clergy” in violation to Florida Statue 617 and did intentionally batter and allow and assist Defendants Beck, Meister, Karen Harrod Townsend, William Brown III, Gayle Lynn and April Beck and Paula Powell and other employees to violate these Plaintiffs as stated.

265. WHEREFORE Plaintiffs demand judgement against each defendant as follows:

- A. For General Damages
- B. For Special Damages due to Plaintiffs loss of relations, integrity, good name
- C. For costs incurred in this action
- D. For attorneys fees
- E. For any and all mortgages and debts of the Corporation for failure to provide these children the proper standard of care and use of the new school as promised by the pastors and others.
- F. For unjust enrichment
- G. For Punitive Damages
- H. For such other and further relief as the Court may deem proper.

COUNT IX
NEGLIGENT RETENTION---

AGAINST ALL MEMBERS AT LARGE OF THE FBCCP AND CPCS AND THE CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK AND THE MEMBERS OF THE PERSONNEL COMMITTEE AND DEACONS AND AS THE CPCS SCHOOL BOARD MEMBERS AS DEFENDANTS IN THEIR INDIVIDUAL AND IN ALL CORPORATE OFFICES AND POSITIONS AND AS ASSOCIATE GENERAL MEMBERS WITH DUTIES PER THE BY-LAWS

266. Plaintiffs re-allege all points above and below and incorporates them herein.

267. Comes Now Plaintiff Randall Townsend Plaintiff RANDALL TOWNSEND, Pro Se, AS AN INDIVIDUAL, AND AS “NEXT FRIEND” AND PATERNAL PARENT OF MINOR SON, J.D.T. AND AS “NEXT FRIEND” AND PATERNAL PARENT OF MINOR DAUGHTER, J.G.T, AND AS A “DIRECT MEMBER” of the First Baptist Church of Citrus Park, (FBCCP) Acting Directly, Indirectly and Derivatively AND AS “NEXT FRIEND” FOR AND OF ALL THE MINOR CHILDREN of the FBCCP and CITRUS PARK CHRISTIAN SCHOOL (CPCS), and sues ALL MEMBERS AT LARGE OF THE FBCCP AND CPCS AND THE CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK AND THE MEMBERS OF THE PERSONNEL COMMITTEE AND DEACONS AND AS THE CPCS SCHOOL BOARD MEMBERS AS DEFENDANTS for Negligent Supervision of employees Ron Beck, Herman Meister, William Brown, III and Karen Harrod Townsend and Gayle Lynn, Paula Powell, April Beck and Joyce Meister and Karen Jeffers as individuals and in their official positions as individuals and employees of FBCCP and CPCS and states:

268. At all times material to herein mentioned, Defendants Ron Beck, William Brown, Herman Meister, Karen Harrod Townsend, Gayle Lynn, Paula Powell, April Beck, Joyce Meister and Karen Jeffers were the agents employed of Defendant First Baptist Church of

Citrus Park(FBCCP) and or Citrus Park Christian School (CPCS) and in doing the things herein alleged was acting within the course and scope of such agency and with permission and consent of his codefendants and with the authority of the Defendant Corporation of FBCCP and all General Voting Members as the Membership at Large.

269.Plaintiffs allege ALL MEMBERS AT LARGE OF THE FBCCP AND CPCS AND THE CORPORATION OF THE FIRST BAPTIST CHURCH OF CITRUS PARK AND THE MEMBERS OF THE PERSONNEL COMMITTEE AND DEACONS AND AS THE CPCS SCHOOL BOARD MEMBERS were intentionally, knowingly, negligent and reckless in the RETENTION and employment of each employee per the duties and standards of care and of the performance of services as stated in the FBCCP BY-LAWS, and CPCS ENROLLMENT CONTRACTS and CPCS STUDENT HANDBOOKS DUTIES AND SERVICES as stated above and below herein.

270.Plaintiff Townsend alleges that defendants were properly advised of their intentional, knowingly, reckless and negligent care and RETENTION by the participation of Plaintiff Townsend at the January 23, 2000, Business Meeting and by the production of multiple letters and verbal communications to advise of the negligent actions and violations of the Corporation BY-LAWS and CPCS Agreements and Contracts.

271.As an approximate and resulting cause of the negligent actions by Defendants as stated and incorporated herein Plaintiffs did suffer damages and Plaintiff alleges the Defendants “had reason to know of misconduct and did nothing to prevent reasonably foreseeable harm from being inflicted on the parishioners as these Plaintiffs” and as all defendants knowingly, intentionally, recklessly and negligently chose to “give benefit to clergy” in violation to §617, §775.03 F. S. and By-Laws, and did intend, allow and assist

Defendants Beck, Meister, Karen Harrod Townsend, William Brown III, Gayle Lynn and April Beck and Paula Powell and other employees to violate these Plaintiffs and do battery against these Plaintiffs as stated.

272. WHEREFORE Plaintiffs demand judgement against each defendant as follows:
- A. For General Damages
 - B. For Special Damages due to Plaintiffs loss of relations, integrity, good name
 - C. For costs incurred in this action
 - D. For attorneys fees
 - E. For any and all mortgages and debts of the Corporation for failure to provide these children the proper standard of care and use of the new school as promised by the pastors and others.
 - F. For unjust enrichment
 - G. For infliction of emotional distress.
 - H. For such other and further relief as the Court may deem proper.

COUNT X
COMMON LAW FRAUD—AGAINST ALL DEFENDANTS

273. Plaintiffs re-alleges all points above and below and incorporates them herein.

274. 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 further sues under the **TORT CLAIMS ACT** and makes the following statements in support of the claim:

275. Defendants intentionally, knowingly, recklessly or negligently concealed or

omitted material facts as to the true Duty of each person and agency and other entity that they did not have “jurisdiction” or “cause to act” and defendants intended plaintiffs rely upon their alleged professional and expert position of their superior knowledge of their DUTY NOT TO ACT or take the duty of care actions of supervision, investigative, probative actions or duty to prosecute under the law to avoid the “nuisance” and “risks” damages and all damages incurred by Plaintiffs.

276. Plaintiffs reasonably relied on defendant’s representations and omissions of truthful disclosure and as a proximate result thereof was deceived, battered and damaged.

279. WHEREFORE, the Plaintiff demands trial by jury on all issues so triable and prays this Court will award damages against Defendants, including court costs, compensatory damages, nominal damages and punitive damages and any other further relief as the Court may deem proper.

COUNT XI
NEGLIGENCE—AGAINST FIRST BAPTIST CHURCH OF CITRUS
PARK CORPORATION Inc. AND Corporation OFFICERS/TRUSTEE and
Individuals as—BECK, GEOFF SMITH—HERMAN MEISTER—GARY
LEATHERMAN—TIM JEFFERS—WILLIAM BROWN AND JOE HOWLETT

280. Plaintiffs reallege all paragraphs above and below and incorporates all herein.

281. At all relevant times defendants FIRST BAPTIST CHURCH OF CITRUS PARK CORPORATION Inc. AND Corporation OFFICERS/TRUSTEE and as individuals as RON BECK, GEOFF SMITH, HERMAN MEISTER, GARY LEATHERMAN, TIM JEFFERS, WILLIAM BROWN AND JOE HOWLETT owed a duty to plaintiffs and to use reasonable care in their duties per the obligations, Rights and Standards of the FBCCP Corporation BY-LAWS, as recognized in the State of Florida as a living Contract per §617, F.S.

282. Defendants breach their duty by failing to properly report all financial records, by falsely reporting financial records, by concealing “secret accounts”, by concealing Credit Card Billings, by concealing the frauds of the building and growth false plan called the “VISIONS”, by negligently supervising their conduct and the conduct of other employees to operate to the standards of the Corporation BY-LAWS, Criminal Laws, Civil Laws, Domestic Relations Laws, Labor Laws, Internal Revenue Service Laws and negligent care of the Awana Children by improper maintaining of the Fellowship Hall and Sonshine Patch and other facilities and property and vehicles and by failing to disclose the fraudulent actions and slanders and injurious falsehoods about Plaintiff of the Pastors Schisms to convey falsehoods about the Master Building Plan to the General Membership and by omissions of truthful disclosure that this Plaintiff Townsend was honorable to the true duties and obligations at all times to the BY-LAWS and State Statues and Defendants were negligent in interference with child custody of this father and did cause Battery and abuse of process and Malicious Prosecution and fraud on Plaintiffs Townsend and J.D.T and J.G.T and minor plaintiffs for who Townsend speaks.

283. At all times relevant Defendants owed a duty to plaintiffs to take reasonable and adequate steps to investigate and report truthfully all allegations of frauds, deceptions, misappropriations of funds and false reporting of the Master Building Plan and violation of FBCCP property and theft from these Children and protection of all Plaintiffs rights.

284. At all times relevant Defendants owed a duty to plaintiffs to follow all practices as described in the BY-LAWS to prevent undue harm, battery and loss of reputation, loss of family and family harmony and relations and an harmonious spirit in resolving all issues but Defendants breached these duties intentionally, willfully, knowingly, recklessly and

negligently in conspiracy to conceal their own individual and collective unjust enrichment and unlawful acts and violations of the employee contracts and BY-LAWS.

285. Defendants breached its duty to plaintiffs by failing to take reasonable and adequate steps to communicate and to ensure that all members to whom it managed and protected followed all procedures of the BY-LAWS and State Statues and Federal Laws.

286. Defendants' breach proximately caused damage to plaintiffs as stated herein.

287. WHEREFORE, the Plaintiff demands trial by jury on all issues so triable and prays this Court will award damages against Defendants, including court costs, and any other further relief as the Court may deem proper and for infliction of emotional distress for frauds for battery and for loss of employment and loss of economic opportunities and unjust enrichment.

COUNT XII

FRAUD—AGAINST FIRST BAPTIST CHURCH OF CITRUS PARK CORPORATION AND OFFICERS/TRUSTEE—RON BECK, GEOFF SMITH—HERMAN MEISTER—GARY LEATHERMAN—TIM JEFFERS—WILLIAM BROWN AND JOE HOWLETT AND MIKE SHUMATE—MARK NUNES—ROBERT GILES—Individually and in their CORPORATION OFFICERS Capacities as stated above herein

197. Plaintiffs reallege all paragraphs above and below and incorporates herein.

198. Defendants herein intentionally, knowingly, recklessly or negligently concealed or omitted material facts and omitted truthful disclosures as to the true intentions, reports, allegations and conduct of Plaintiff Townsend as Plaintiff Townsend did his DUTY as a General Voting Member and a persons of several leadership positions, namely LRPC Chairman, Awana Commander and Nominations Committee Member and various other titles and Defendants fraudulent did injurious falsehoods to and about this Plaintiff Townsend with malicious to inflict emotional distress to require and coerce and by

extortion attempt to require Plaintiff Townsend to stop his alleged false allegations now all proved to be true as to the motives and intentionally injurious breach of duties by these Officers and Trustee's regarding now proving the missing funds, secret accounts, Credit Card misuse, frauds about the Master Building Program, fraud that the 7705 Gunn Highway property could hold a K-12th grade and each and all now proved true allegation as told in each letter or testimony to these Courts, labor violations, Vehicles violations.

199. Plaintiffs reasonably relied on defendants representations and omissions and as a proximate result thereof was deceived, battered and damaged.

200. WHEREFORE, the Plaintiff demands trial by jury on all issues so triable and prays this Court will award damages against Defendants, including court costs, and punitive damages and any other further relief as the Court may deem proper.

COUNT XIII

**ABUSE OF PROCESS BY ASSAULT AND FRAUD AGAINST DEFENDANTS
THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA FOR ACTS
OF JEB BUSH AND CHARLIE CRIST AND DEPUTY JOE HOWLETT,
DEPUTY TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN, DEPUTY MIKE
SMOAK, TAMPA POLICE OFFICER JOE KAREAS AND OFFICER MIKE
SAHR AND ATTORNEYS AND JUDGES AND FDLE AGENTS AND THE
AGENCY AND THE DEPARTMENT OF CHILDREN AND FAMILIES AND
THE DEPARTMENT OF THE ATTORNEY GENERAL AND THE
DEPARTMENT OF THE STATE ATTORNEYS OFFICE AND AGENTS AND
FLORIDA BAR AGENTS AND AGENCY OF THE FLORIDA BAR AND FOR
JUDICIAL QUALIFICATION AGENTS AND AGENCIES FOR ACTS AGAINST
PLAINTIFF RANDALL TOWNSEND**

201. Comes Now Plaintiff, Randall Townsend individual, and sues Defendants FOR ABUSE OF PROCESS BY ASSAULT AND FRAUD AGAINST DEFENDANTS THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA FOR ACTS OF JEB BUSH AND CHARLIE CRIST AS GOVERNOR AND CHARLIE CRIST AS ATTORNEY GENERAL AND AS INDIVIDUALS AND DEPUTY JOE HOWLETT, DEPUTY TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN, DEPUTY MIKE SMOAK, TAMPA POLICE OFFICER JOE KAREAS AND OFFICER MIKE SAHR AND ATTORNEYS AND JUDGES AND FDLE AGENTS AND THE AGENCY AND THE DEPARTMENT OF CHILDREN AND FAMILIES AND THE DEPARTMENT OF THE ATTORNEY GENERAL AND THE DEPARTMENT OF THE STATE ATTORNEYS OFFICE AND AGENTS AND FLORIDA BAR AGENTS AND AGENCY OF THE FLORIDA BAR AND FOR JUDICIAL QUALIFICATION AGENTS AND AGENCIES FOR ACTS AGAINST PLAINTIFF RANDALL TOWNSEND as individuals and as Law Enforcement, Sheriff Deputies and Police officers and General Members of FBCCP and as FBCCP Officers and Agents and Citizens of the State Of Florida and Plaintiffs reallege all paragraphs above and below and incorporates herein and alleges:

202. Plaintiff, Randall Townsend, is an individual residing at relevant times in Hillsborough, Sarasota and Pinellas County's of Florida within the jurisdiction of the UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and with rights as a citizen and FBCCP member now not able to be fully known until the production of FBCCP Business Records in June/July 2006, to have Constitutional and BY-LAWS rights to Speech, Assembly, No Child interference with his fathers rights, and

Religious freedoms and for life, liberty and pursuit of happiness but to conceal the frauds
And battery of pastors and sheriff deputies as masked trustees these defendants did use
their Law Enforcement uniforms as masks that all activities of themselves and these
clergy and attorneys and judges were lawful and now proved fraud, and collusion as
stated herein.

203. Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe

Kareas and Mike Shar are individuals residing within the Counties of Hillsborough and Pasco of, Florida and working or were working at their times of actions or were “on duty” or “off duty” and or now retired as “law enforcement” within the Counties of Hillsborough, Pasco and Pinellas of Florida and within the jurisdiction of the State of Florida and of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA.

204. Plaintiff Townsend restates all paragraphs of Number 4-20 as above herein that show that action is proper within the venue and Jurisdiction of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and Because each Defendant is a resident or was doing or was alleging to do official duties, “on duty” and “off duty” as “law enforcement” or as officers of the courts or as Officers of the State and this court is a proper venue for this action as stated above herein.

205. This is an action for damages in excess of \$ 25,000.00 and is within the jurisdiction of this court.

206. On or about September 8, 1999, and still through current times and at all other times as stated above and herein at the First Baptist Church of Citrus Park at 7705 Gunn Highway, Tampa Florida, and at 18105 Gunn Highway, Tampa Florida and at the Court Room of Judge Raul Palomino of Hillsborough County on November 15, 2001, by individual and as Deputy Joe Howlett(Howlett) and by Howlett at Citrus Park Town Center Mall on numerous occasions and by Mike Sahr at Kmart in Sarasota, Florida and by each Defendant in Count XIII, herein and on surrounding roads at or about Gunn Highway at or around the Citrus Park Baptist Church Defendant assaulted Plaintiff in that Defendants Howlett and Smoak did use their Deputy Crusiers at times with lights

flashing to impede the peaceful operation of Plaintiff Townsend in or out side of his vehicle to deter, inflict battery, shame and harassment and abuse and Deputy Howlett even on occasions would attempt to coerce Plaintiff Townsend to retaliate with resistance so Deputy Howlett could arrest Plaintiff Townsend and per the verbal under oath testimony of Defendant Ron Beck on November 15, 2001, under oath to Judge Raul Palomino Beck did attempt to use the alleged needed actions of Howlett and Jeffers and Smoak to allege that Plaintiff Townsend without lawful duty or cause had to be restrained or blocked from alleged illegal or unlawful conduct at the steps of the Church despite Plaintiff Townsend being a member and fully and completely can prove that Plaintiff Townsend was invited by several members to address in open forum business meeting process per the BY-LAWS duty the issues of frauds and corruption of these Pastors and these same deputies as alleged Trustee's. Plaintiff states that each deputy and officer at all times herein and in all paragraphs above and below appeared to each plaintiff to be acting in their official "mask" or uniform as an officer of the law and that all deputies and officers acted to appear to be within their official roles in order to inflict conspired control, restraint and protection of Plaintiff Townsend to others. Plaintiff Townsend alleges that even Corbin did publicly yell and abuse Plaintiff Townsend to make a public scene for the alleged protection of others despite Corbin as a member of the LRPC Committee fully knowing the pure motives of Plaintiff Townsend. Defendants, while arguing at Plaintiff over Church issues and pastor and others criminal actions and frauds, would yell publicly, chase plaintiff on foot, chase plaintiff in official vehicles and attempted to at times even in uniform cause or Ordered Plaintiff Townsend from his car so Deputies could show alleged protection to others and possible entice Plaintiff

Townsend to resist the harassment and abuse. Defendant Jeffers even did Touch the Wife of Plaintiff Townsend on the steps of the Church and led her away from talking to Plaintiff Townsend so to make appear that persons were in danger. Defendant Howlett at times stood in front of Plaintiff, who was in his car, blocking him in his seat. Defendant then threatened to arrest Plaintiff and raised his hand to his gun belt as if to need against Plaintiff, all the while standing over Plaintiff and leaving Plaintiff no avenue of escape.

207. Defendant intended to cause apprehension of imminent harm in Plaintiff in that Defendant Beck had advised Plaintiff Townsend show that defendant's acts were intended as Defendant Beck stated "he would file charges if Plaintiff tried to speak in Church meetings or attend Church or School services and business meetings or school functions and as told to judge Palomino on November 15, 2001, by Defendant Ron Beck and Defendant Employee Karen Harrod Townsend. Defendant approached Plaintiff, who was seated many times in his car, with no intent to harm anyone would be approached and engaged by Defendants threatening to cause violent physical injury by arrest, and then use police type car chases, traffic stops with lights flashing, intervention at the Church Steps prohibiting Plaintiff now fully known to have always been a member of the Corporations with rights not restricted by the Courts but only on November 2-15, 2001, and by Deputy Howlett making false allegations to Curtis Baughman and attending the Court of Judge Palomino stating willingly to give false testimony and , thereby causing Plaintiff to feel threatened with imminent bodily injury and place him in apprehension for his safety and fear of going to prison. Furthermore, Defendant's acts were substantially certain to result in apprehension of imminent harm in Plaintiff.

208. Because Defendant Howlett made intentional threats to Plaintiff, in the April 2000

meeting to “get your hands on the table” and at times in traffic stops would require Plaintiff to flee the property while just sitting waiting for his children or be chased by Deputy Howlett, Deputy Smoaks and being yelled at and repeatedly chased by Defendant Ron Beck in his vehicle even at one time with a visiting evangelist willing to verbally communicate the threats and chase to pastors at Idlewild Baptist Church and was not restrained in his movements as Plaintiff was, Defendant had the apparent present ability to harm Plaintiff as he was threatening to do and as a direct and proximate result, Plaintiff reasonably feared that Defendant would imminently inflict bodily harm on or put Plaintiff in jail. Plaintiff Townsend at multiple times did inform, plead and request intervention by The Office of the Governor and of Jeb Bush and Charlie Crist to no avail in violation of the Duties and Office of the Governor per the Florida Statues as stated herein and by the failure of the Governor and Attorney General’s Office to conduct their duty all Defendants failed to do “Duty” of their Office and Civic Duty to control and detain the actions of alleged law enforcement and attorneys and Judges as stated herein and Plaintiffs state that Jeb Bush and Charlie Crist had personal and individual self-serving for personal gain motives and thereby refused the reasonable pleading of Plaintiff Randall Townsend for himself and for those whom he speaks and thereby the individual interests of Jeb Bush and Charlie Crist caused a breach of their Official Duties as Governor and as Attorney General and as Commissioner of Education being duly notified by Plaintiff.

209. As a direct and proximate result of Defendant's conduct, Plaintiff was injured in that Plaintiffs were frightened and excited, resulting in a mental and nervous injury that has caused Plaintiff great emotional pain and suffering and loss of his family and loss of his relationship now freely per his civil rights with his children since October 20, 1999, and

now having not been able to see his children now since November 8, 2002 and reputation and employment and loss of future ability to earn income and reduction in ability to earn income and defamation and battery and slander.

210. As a further direct and proximate result of Defendant's conduct, Plaintiff has been damaged in the yet undetermined amount of financial damages for the cost of medical bills, and for lost earnings and the ability to create employment and earnings.

WHEREFORE, Plaintiff demands judgment as follows:

- A. For general damages.
- B. For punitive damages.
- C. For intentional infliction of emotional distress and battery**
- D. For costs of suit incurred in this action.**
- E. FOR UNJUST ENRICHMENT
- F. For other and further relief as the Court may deem proper.

COUNT XIV

ABUSE OF PROCESS BY TORT INTERFERENCE OF CONTRACT KNOWN AS THE FBCCP BY-LAWS AND MARRIAGE CONTRACT—AGAINST DEFENDANTS-- Defendant RONALD L. BECK, Individually, 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,** 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. 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 Statutes as stated herein. GRANT maintains his office and residence in Hillsborough County, Florida. DEFENDANTS KAREN HARROD TOWNSEND, Individually, as estranged former wife of Plaintiff and mother and former CPCS school teacher of Plaintiff J.D.T and J.G.T and KAREN HARROD TOWNSEND AS EMPLOYEE OF CITRUS PARK CHRISTIAN SCHOOL A MINISTRY OF THE FBCCP and maternal family as STEVEN TYLER HARROD, (STEVE HARROD) Individually, DONALD HARROD, (DON HARROD) Individually, NORMA HARROD, (NORMA HARROD) Individually and CHARLES H. SCRUGGS III., Individually, CHARLES H. SCRUGGS, III. ESQUIRE, As attorney at law, and CHARLES H. SCRUGGS, III, P.A., A Professional Association Law Firm and

HEATHER M. GRAY, Individually, HEATHER M. GRAY, ATTORNEY AT LAW,
HEATHER M. GRAY, PROFESSIONAL ASSOCIATION AS A FLORIDA
CORPORATION,

210. COMES NOW 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 the Constitution and BY-LAWS of the First Baptist Church of Citrus
Park and Plaintiff Townsend's post office address is P.O. BOX 21, ODESSA, FL 33556.

211. Defendant RONALD L. BECK, Individually, 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, 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. 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 Statutes as stated herein. GRANT maintains his office and residence in Hillsborough County, Florida. DEFENDANTS KAREN HARROD TOWNSEND, Individually, as estranged former wife of Plaintiff and mother and former CPCS school teacher of Plaintiff J.D.T and J.G.T and KAREN HARROD TOWNSEND AS EMPLOYEE OF CITRUS PARK CHRISTIAN SCHOOL

A MINISTRY OF THE FBCCP and maternal family as STEVEN TYLER HARROD, (STEVE HARROD) Individually, DONALD HARROD,(DON HARROD) Individually, NORMA HARROD, (NORMA HARROD) Individually, CHARLES H. SCRUGGS III., Individually, CHARLES H. SCRUGGS, III. ESQUIRE, As attorney at law, and CHARLES H. SCRUGGS, III, P.A., A Professional Association Law Firm.

212. Plaintiff alleges all paragraphs above and inclusive herein.

213. Plaintiff at all time material hereto is a resident of the State of Florida, with a mailing address at P.O. Box 21, Odessa, FL 33556.

214. This is an action for damages in excess of the minimum jurisdiction of this Court.

215. On or about November 2001, Plaintiff was jointly served Cases 01-15813, Beck et al v. Townsend and Case No: 01-15814, Townsend v. Townsend, alleging Criminal Charges of Repeat Violence and Stalking and Domestic Violence and Stalking and other verbal accusations allege in the affidavits and court of Judge Raul Palomino during the Affidavits of October 31, 2001, by Ron Beck et al. And by Karen Harrod Townsend in Affidavits of November 2, and November 14, 2001. These said affidavits lead to INJUNCTIONS being duly served and honored during the period of November 2, 2001 until being QUASHED by Judge Palomino ruling these Injunctions were without cause and gave detailed warnings to Defendants herein of violations of rights of this Plaintiff herein. These warnings were ignored by Defendants as stated herein. And stated in all cases as shown herein for which Plaintiff asks this Court to take judicial notice of all cases relating back to cases 01-15813 & 01-15814.

216. On or about April 2002, Plaintiff was served Case 02-4974, a COMPLAINT FOR

DIVORCEMENT and Petition for Child Custody resulting from Defendants intentional, knowingly, recklessly and negligently conspiring to conceal and restrain the attempt by this Plaintiff Townsend to per his duty to the State Of Florida, the First Baptist Church of Citrus Park Corporation, the Naïve General Voting Members and the Children in the Care and Management of the Plaintiff Townsend and the Marital Children J.D.T and J.G.T to restrain and abuse Plaintiff and inflict emotional distress and ruin the public image of this Plaintiff so Plaintiff would or could not reveal the Criminal, Civil, Domestic Violations of Law, Child Abuse and Negligent Care of Children and Labor Law Violations and Internal Revenue Service violations and frauds and omissions of truthful disclosure and tampering with witnesses, obstruction of justice and perjury, Defendants through FBCCP Employee Karen Harrod Townsend filed suit for DIVORCEMENT and Child Custody.

217. Plaintiff alleges that this Suit for DIVORCEMENT and CHILD CUSTODY was not based on “irreconcilable differences” but was tort and Abuse of Process to conceal and do fraud on the courts and on law enforcement and other naïve persons in the public eye with the intentional conspired purpose doing battery as extortion and of damaging the reputation and public image of Plaintiff Randall Townsend and these actions were violations and fraud on the court as stated in RYAN v. RYAN 277 So2d 266. (Fla. Sct. 1973) for the unjust enrichment of themselves and others.

218. Plaintiff alleges that the SUIT was brought intentionally to conceal from this Plaintiff his children J.D.T and J.G.T and prevent this father from getting these marital children proper medical care as reported was needed by Dr. Santiago Hoyos and Dr. Ernesto Millan in written findings of January 18, 2002, and February 12, 2002 for Minor J.G.T. and for various medical reports for Minor J.D.T.

219. Plaintiff alleges that this Suit for Divorcement was an continuation of conspiracy assisted by the false representations of Sheriff Deputy Joe Howlett as alleged Trustee of FBCCP with other Schism Officers and other employees and members of the Corporation and Defendant Karen Harrod Townsend and with all Harrods (Don, Norma, Steve) and “Scruggs” to conceal their unjust enrichment and coercion and frauds falsely alleged against this plaintiff.

220. Plaintiff alleges that this Suit for Divorcement was a continuation of the allegations of cases 01-15813 and 01-15814, to continue the concealment of all actions of tort and negligence as shown and incorporated all paragraphs herein and caused Plaintiff and others to be deceived and Plaintiff suffered damages thereby including an DIVORCE JUDGMENT WITH INJUNCTIONS that still damage this Plaintiff with injurious falsehoods and prevents this father from seeing his children now since November 8, 2002 by the unlawful interference and abuse of process and interference with Constitutional, and BY-LAW rights to family and protection of civil and religious beliefs of plaintiffs.

221. WHEREFORE, the Plaintiff demands trial by jury on all issues so triable and prays this Court will award damages against Defendants, including court costs, and any other further relief as the Court may deem proper.

COUNT XV

BREACH OF CONTRACTUAL FIDUCIARY DUTY—AGAINST DEFENDANTS CHARLES H. SCRUGGS III, INDIVIDUALLY, CHARLES H. SCRUGGS III, ATTORNEY AT LAW, CHARLES H. SCRUGGS P.A., ATTORNEY CHARLES DENNY, IV, Individually and as Attorney at law, A. JAMES ROLFES, Individually and As Attorney At Law and DICKINSON & GIBBONS, P.A., Drew Gardner, Individually, and Drew Gardner, Attorney At Law and David Gibbs, III, Individually, and David Gibbs, III, Attorney At Law, and The GIBBS LAW FIRM, and the CHRISTIAN LAW ASSOCIATION, Ronald L. Beck, individual, Ronald L. Beck as Corporation Senior Pastor, Geoff Smith, Individual, Geoff Smith, Corporation Trustee/President, Joe Howlett, Individual, Joe Howlett, Corporation Trustee, Gary Leatherman, Individual, Gary Leatherman, Corporation Trustee and Tim Jeffers,

Individual, and Tim Jeffers Corporation Trustee and Herman Meister, Individual, and Herman Meister as Pastor of School Ministries CPCS. 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, STACEY TURMEL, Individually, STACEY TURMEL AS ATTORNEY AT LAW, OF STACEY TURMEL, P.A., THE LAW FIRM OF 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, 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 SHERIFF JOE HOWLETT AND DEPUTY SHERIFF MIKE SMOAK AND DEPUTY SHERIFF SCOTT WELLINGER, Individually, SCOTT WELLINGER, AS A HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT, DEPUTY SHERIFF LUTHER CORE, Individually, LUTHER CORE AS HILLSBOROUGH COUNTY SHERIFF DEPUTY DETECTIVE EXECUTIVE SUPPORT DEPARTMENT INTERNAL AFFAIRS, DEPUTY SHERIFF PAUL J. GUARINO, Individually, PAUL J. GUARINO, AS HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT PROPERTY CRIMES UNIT, DEPUTY HARRY HOOVER, Individually, HARRY HOOVER, AS HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT FOR INTERNAL AFFAIRS, JIM COATS, AS SHERIFF OF PINELLAS COUNTY FLORIDA, DEPUTY SHERIFF JOSEPH A. GILLETTE, SERGENT ADMINISTRATIVE INVESTIGATIONS DIVISION PINELLAS COUNTY SHERIFF' OFFICE, DEPUTY SHERIFF TIM JEFFERS, THE PINELLAS COUNTY SHERIFF'S OFFICE, BOB WHITE, AS SHERIFF OF PASCO COUNTY FLORIDA, DEPUTY SHERIFF JOHN MICHEAL CORBIN OF PASCO COUNTY FLORIDA, THE DEPARTMENT OF THE PASCO COUNTY SHERIFF, THE CHIEF OF POLICE OF TAMPA, FLORIDA, and 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, THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT CURTIS BAUGHMAN, Individually, NANCY LOPEZ, Individually, CURTIS BAUGHMAN AND NANCY LOPEZ AS EMPLOYEES OF VICTIMS ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA, THE DEPARTMENT OF VICTIMS ASSISTANCE, MARK A. OBER, Individually, MARK A. OBER AS STATE ATTORNEY OF FLORIDA, CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY FLORIDA CIRCUIT CIVIL COURTS, MANUEL MENENDEZ JR. Individually, WAYNE TIMMERMAN, Individually, JUDGE WAYNE TIMMERMAN A CIRCUIT COURT JUDGE OF HILLSBOROUGH

COUNTY FLORIDA, RAUL PALOMINO, Individually, JUDGE RAUL PALOMINO, A CIRCUIT COURT JUDGE FOR 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, MARVA CRENSHAW, Individually, JUDGE MARVA CRENSHAW, 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, MS. "DOE" LIEMAN, MS. "DOE" LIEMAN, Individually, THE FLORIDA BAR TAMPA INTAKE STAFF EMPLOYEE MS. JANE CRISTY and Ms. JANE CRISTY, Individually, THE STATE OF FLORIDA, and

222.Comes now Plaintiff Randall Townsend and Sues Defendants

ATTORNEY CHARLES H. SCRUGGS, III, and CHARLES H. SCRUGGS, III, ATTORNEY and CHARLES H. SCRUGGS, P.A. and CHARLES DENNY, IV, Individually and as ATTORNEY AT LAW and A. JAMES ROLFES, Individually and as ATTORNEY AT LAW and the DICKINSON & GIBBONS, P.A., LAW FIRM, DREW GARDNER, Individually, and DREW GARDNER, ATTORNEY AT LAW and DAVID GIBBS, III, Individually, and DAVID GIBBS, III, ATTORNEY AT LAW, and The GIBBS LAW FIRM, and the CHRISTIAN LAW ASSOCIATION, RONALD L. BECK, individual, Ronald L. Beck as FBCCP Corporation Senior Pastor, Geoff Smith, Individual, Geoff Smith, Corporation Trustee/President, Joe Howlett, Individual, Joe Howlett, Corporation Trustee, Gary

Leatherman, Individual, Gary Leatherman, Corporation Trustee and Tim Jeffers, Individual, and Tim Jeffers Corporation Trustee and Herman Meister, Individual, and Herman Meister as Pastor of School Ministries CPCS, and each Defendant listed in this Count herein and alleges:

223.Plaintiff re alleges all paragraphs above and below and incorporates them herein.

224.This cause of action is for damages within the jurisdiction of this Court and for damages yet fully known without Court Ordered Discovery of Documents being concealed by Defendants herein from this Member as Plaintiff Townsend.

225.Plaintiffs alleges as a member of the First Baptist Church of Citrus Park Plaintiffs are granted per the Contract Rights of the BY-LAWS ARTICLE I. Sec. 2 “The members of the corporation shall consist of the members of the First Baptist Church of Citrus Park.” Sec. 4. “The membership present at any regular or special called business meeting shall constitute a quorum for the conduct of the business of the church, when due notice has been given.” Article II. Section 4. “...No deed or mortgage of the corporation’s property shall be executed except upon resolution adopted at a meeting of the members of the corporation.”

226.Plaintiff Townsend alleges that due to the fraudulent position, advice, legal actions, and false misrepresentations as to material facts or knowingly concealment of all or part of material information from this Plaintiff by first Sheriff Deputy Joe Howlett and Jeffers intentionally, knowingly, recklessly and negligently violating the Fourth Amendment rights and BY-LAWS rights of this Plaintiff and “misusing his color of uniform” intending to inflict emotional fear and danger of Plaintiff’s and others and doing gross negligent and great indifference to persons, property and the rights of others but acting to

protect his personal interests as a trustee and as a employee of the Hillsborough County Sheriff's Department and his co-conspirators and that the exposure of the allegations by Plaintiff Townsend would lead to his loss of employment, pension, and possible incarceration and loss of reputation and then the continued fraud of Attorney Denny giving "Benefit to Clergy" as Defendants in Breach of the Duties of the Contract BY-LAWS over the Dutiful Rights of or to this Plaintiff and to the Courts and to the General Voting Members by not allowing this now "newly discovered rights" of this Plaintiff Townsend as still a member being fraudulently concealed by the coercion and fraudulent and knowingly, intentionally, recklessly and negligently actions to conceal these Corporations Business Meeting Records just produced on June 12, 2006, that this Plaintiff as a member of the Corporation was denied his total rights to know of meetings, attend meetings, speak at meetings, ask questions at meetings, lead as the Chairman of the LRPC, participate as Awana Commander to protect the interests of the over 200, children and workers and continue his investigation of the unlawful and violations of the BY-LAWS of these Officers and to continually questions these OFFICERS of the Corporation per the BY-LAWS and the Florida Statues to attend, speak, or ask questions and vote to protect his membership rights as Granted per the BY-LAWS ARTICLE III. Section 7, and that the "DUE PROCESS" Right was violated by the Pastors Schisms I & II, through frauds to this member, his family and the General Voting Members causing deceptions and damages.

227. Plaintiff alleges that the January 2003, BUSINESS MEETING MOTION for a full and complete investigation of the officers of the Corporation was Quashed, fraudulently manipulated and falsely reported per the April 3, 2000, REPORT OF THE PERSONNEL

COMMITTEE and the testimony of the Trustee Gary Leatherman acting on the Personnel Committee blocked the Committee from fact finding regarding his self interests of the reporting of missing accounts and actions to conceal the missing monies just reported to this Plaintiff in June and July 2006 and reports show the General Voting members still are deceived about these secret accounts and misappropriation of funds by the Schisms.

228.Plaintiff alleges that as the Long Range Planning Committee Chairman being unduly removed from this position by the Fraudulent unlawful deceptions and violations of the BY-LAWS due process that the Corporation of the First Baptist Church and this Plaintiff have been deceived and suffered damages even incurring DEBT due to the Coercion and “Benefit of Clergy”.

229.Plaintiff alleges that all financial debt of the Corporation would not have occurred but for the “Benefit of Clergy” and frauds by Attorney Denny with the “pastors Schism I & II” trying to suppress and omit the truthful disclosure of the truth of this Plaintiff to the General Voting Members prior to any vote of said members.

230. Plaintiff allege that therefore all the VOTES of the GENERAL VOTING MEMBERSHP have been gained by FRAUDULENT BUSINESS PRACTICES AND OMISSIONS OF TRUTHFUL DISCLOSURE, since September 8, 1999, are invalid and specifically the votes of the July 2, 2000, REVISED BY-LAWS and the vote or votes of Mortgages for any building projects were denied by the Coercion of Attorney Denny in violation of his Fiduciary duty to be truthful to the Clients of the Corporation vested with rights per the By-laws and that the Actions of attorney Denny and the firm of Dickinson & Gibbons, did show “Benefit to clergy” and thereby granted superior rights of speaking or voting by fraudulent actions and omissions of truthful disclosure in Breach of

Fiduciary Duty by the Corporation Trustee's and Officers as Pastors knowing that the Voting to revise the BY-LAWS was being done to remove rights from the General Voting Member and give undue privileges to the Corporation Officers.

231. Plaintiff further alleges that Attorney Denny denying the Rights of this Plaintiff Townsend per the By-Laws, did give "BENEFIT TO CLERGY" to extend the fraudulent business practices now revealed by the production of the Corporation Credit card billings of the uses allegedly approved by Ron Beck but reveal concealed "pecuniary gain" and unlawful loans to an officer of the Corporation in violation of the rights of the General Voting Members to have knowledge of or approve these unrevealed "secret accounts" and the concealment thereby causes and allows misappropriation of corporate opportunity incurring liability on Plaintiff herein and provides Defendants unjust enrichment.

232. Plaintiff Townsend further alleges that the Firm Of DICKINSON & GIBBONS upon being duly informed by Plaintiff Townsend conspired and negligently managed and approved the malfeasance of Attorney Denny to this plaintiff and to the Courts and to the General Voting Membership and did not take sufficient or reasonable cause or care to rightfully undo these actions to properly notify or protect the rights due to these clients and thereby become vicariously liable by their conduct or lack thereof.

233. Plaintiff Townsend further alleges that Pastors Schisms I & II, jointly conspired with Attorney Denny and greatly benefited thereby to do financial damage and loss to the General Voting Members by the deception and damages illegally obtained from the General Voting Members and this Plaintiff and by fraudulent practices did set in motion actions of others with malicious intent to fraud and damage this Plaintiff Townsend in the Public's eye and in his places of Employment and thereby caused loss of employment

and damages.

234. Plaintiff alleges per **DEMETREE v. STATE** 89 So2d 498 (Fla. 1956) that each defendant herein intentionally, knowingly, recklessly and negligently violated the rulings of Judge Palomino in cases 01-15813, and 01-15814, jointly releasing any and all **INJUNCTIONS** on November 15, 2001, against this Plaintiff, and even advising Defendants of violations of the rights of this Plaintiff but by fraud Defendants conspired and omitted truthful disclosure of the Rulings of the Honorable Judge Palomino and instead continued and increased the limitations of Plaintiff's RIGHTS TO AND WITH HIS CHILDREN and Access on Public Property and potential opportunity to restore his family rights and conveyed fraud in the statements to the Courts as recorded in the **FIRST AFFIRMATIVE DEFENSES** with malicious intent to continue and cause additional fraud and damages to this Plaintiff including the **DIVORCE AND INJUNCTIONS** rulings gained by Attorney Scruggs with Judge Timmerman in November 2003, which still damage this father to not be able to see his children now since November 8, 2002.

235. Plaintiff therefore alleges that the Corporation and this Plaintiff "should be made whole" and "debt free" including all principle sums and interests of any and all mortgages but for the losses incurred by the deceptions of the Defendants herein as the Directive Rights of the General Voting Members to this Chairman of the LRPC before Plaintiff Townsend was removed September 8, 1999, by the frauds of the "pastors schisms" was to proceed with all projects but remain debt free and therefore the demand of "show me the money" and the fraudulent attempts and deceptions of the now newly discovered over \$214,000.00 unreported in periods 2nd, 3rd, 4th, Quarterly Business Meetings and Yearly Business Meeting as required by the BY-LAWS did lead to the

damages incurred. Each Business Meeting shows proof of conspiracy to defraud and by Plaintiff being banned from each meeting the conspiracy of the Pastors Schism I & II and with Attorney Denny and his firm these Defendants have prospered thereby at the suffering of this Plaintiff and the General Voting Members and others.

236. Plaintiff further alleges that each and every one of the representations set forth in the preceding paragraphs concerned material facts for the reason that Plaintiff would not have been barred from his family, his children, his Voting Rights, his Positions of Leadership, his honored reputation, and his employment and future employment(s).

237. Further, Plaintiff and others relied on each and every one of the defendant's representations that resulted in Plaintiff's substantial injury and damages as described more fully below. In this connection, Plaintiff and Plaintiff's Friends the Minor General Voting Members further alleges that Defendants purported to have and did have superior knowledge concerning the subject matter of the transactions described above, and Plaintiff justifiably relied on Defendant's superior knowledge.

238. By reason of Plaintiff's reliance on Defendants representations and fraudulent concealment of material facts and injurious falsehoods as described above, Plaintiff has been damaged in an amount far in excess of the minimum jurisdictional limits of this Court. Plaintiff alleges that Plaintiff paid over \$10,000.00 in legal fees, costs and court reporter fees, lost equity in the marital home, lost profits of fair market value in the marital home in excess of \$100,000.00, lost over \$60,000.00 of unpaid employment commissions from SunBelt Equipment Company, lost the opportunity per the State Attorney to Sue SunBelt for defamation and lost income in a suit in excess of \$1,000,000.00, lost marital rights, lost child society rights and custody, lost an honorable

reputation, lost employment at Kmart as a Level II store manager, lost profit sharing and lost insurance and lost retirement income and incurred debt in an still unknown amount and further lost valuable time in a relationship and incurred lack of use of the assets of the corporation members embezzled by the fraud of the pastors, trustees and adult voting members as shown and named herein and lost use of the building and expansion program but for the fraud and fault of negligent and tort intentional, reckless and malfeasance of officers, alleged trustees, pastors and other general voting members knowingly acting in negligent breach of the FBCCP BY-LAWS.

239. WHEREFORE, the Plaintiff demands trial by jury on all issues so triable and prays this Court will award a judgement and award damages including:

- A. The offset of all FBCCP Corporation indebtedness due to the fraudulent voting and other actions of the Schism to deceive this Plaintiff and the Minor General Voting Membership against Defendants, Ronald L. Beck, individually, Rev. Ronald L. Beck as senior pastor of First Baptist Church of Citrus Park and Trustee Geoff Smith, Trustee Joe Howlett, Trustee Gary Leatherman and Trustee Tim Jeffers and Pastor Herman Meister and Defendant Charles Denny, IV, individually, Charles Denny, IV. Attorney at Law, A. James Rolfes, Individually and A. James Rolfes, Attorney at Law and DICKINSON & GIBBONS, P.A.,
- B. For General Damages, according to proof.
- C. For an award of damages per §57.105(3) “for its reasonable expenses incurred in obtaining an order, which may include attorney’s fees and other loss resulting from the improper delay”.
- D. For an award of Sanctions against Attorneys per §57.105(4) and §57.105(5).
- E. For the Following Special Damages:
- F. For approximately \$10,000.00 in legal fees, costs, and court reporter fees,
- G. Lost of equity in the marital home, lost profits of fair market value in the marital home in excess of \$100,000.00,
- H. Lost of over \$60,000.00 of unpaid employment commissions from SunBelt Equipment Company.
- I. Loss of the opportunity per the State Attorney to Sue SunBelt for defamation and lost income in a suit in excess of \$1,000,000.00 due to the allegations of defendants herein during the statue of limitation periods
- J. Loss of marital rights,
- K. Loss child society rights and custody,
- L. Loss of an honorable reputation,

- M. Loss of employment at Kmart as a Level II store manager, and lost profit sharing and lost insurance and lost retirement income and incurred debt in an still unknown amount and lost ability to earn future income
- N. For costs of suit incurred in this action.
- O. For intentional infliction of emotional distress and battery and slander
- P. For intentional infliction of child custody and visitation in Society. As this father was and is prohibited from his children as the Injunctions are still being enforced by frauds.
- Q. For Punitive Damages
- R. For other and further relief as the court may deem proper.

COUNT XVI

FRAUD—AGAINST DEFENDANTS ATTORNEY CHARLES DENNY, IV, Individually and as Attorney at law, A. JAMES ROLFES, Individually and As Attorney At Law and DICKINSON & GIBBONS, P.A., Drew Gardner, Individually, and Drew Gardner, Attorney At Law and David Gibbs, III, Individually, and David Gibbs, III, Attorney At Law, and The GIBBS LAW FIRM, and the CHRISTIAN LAW ASSOCIATION, Ronald L. Beck, individual, Ronald L. Beck as Corporation Senior Pastor, Geoff Smith, Individual, Geoff Smith, Corporation Trustee/President, Joe Howlett, Individual, Joe Howlett, Corporation Trustee, Gary Leatherman, Individual, Gary Leatherman, Corporation Trustee and Tim Jeffers, Individual, and Tim Jeffers Corporation Trustee and Herman Meister, Individual, and Herman Meister as Pastor of School Ministries CPCS. 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, STACEY TURMEL, Individually, STACEY TURMEL AS ATTORNEY AT LAW, OF STACEY TURMEL, P.A., THE LAW FIRM OF STACEY TURMEL, P.A., MR. CHARLIE CRIST, Individually, MR. CHARLIE CRIST, AS GOVERNOR OF THE STATE OF FLORIDA, MR. CHARLIE CRIST, AS IN THE OFFICIAL POSITION AS THE ATTORNEY GENERAL FOR THE STATE OF FLORIDA, 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 SHERIFF JOE HOWLETT AND DEPUTY SHERIFF MIKE SMOAK AND DEPUTY SHERIFF SCOTT WELLINGER, Individually, SCOTT WELLINGER, AS A HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT, DEPUTY SHERIFF LUTHER CORE, Individually, LUTHER CORE AS HILLSBOROUGH COUNTY SHERIFF DEPUTY DETECTIVE EXECUTIVE SUPPORT DEPARTMENT INTERNAL AFFAIRS, DEPUTY SHERIFF PAUL J. GUARINO, Individually, PAUL J. GUARINO, AS HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT PROPERTY CRIMES UNIT, DEPUTY HARRY HOOVER, Individually, HARRY HOOVER, AS HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT FOR INTERNAL AFFAIRS, JIM COATS, AS

SHERIFF OF PINELLAS COUNTY FLORIDA, DEPUTY SHERIFF JOSEPH A. GILLETTEE, SERGENT ADMINISTRATIVE INVESTIGATIONS DIVISION PINELLAS COUNTY SHERIFF' OFFICE, DEPUTY SHERIFF TIM JEFFERS, THE PINELLAS COUNTY SHERIFF'S OFFICE, BOB WHITE, AS SHERIFF OF PASCO COUNTY FLORIDA, DEPUTY SHERIFF JOHN MICHEAL CORBIN OF PASCO COUNTY FLORIDA, THE DEPARTMENT OF THE PASCO COUNTY SHERIFF, THE CHIEF OF POLICE OF TAMPA, FLORIDA, and 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, THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT CURTIS BAUGHMAN, Individually, NANCY LOPEZ, Individually, CURTIS BAUGHMAN AND NANCY LOPEZ AS EMPLOYEES OF VICTIMS ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA, THE DEPARTMENT OF VICTIMS ASSISTANCE MARK A. OBER, Individually, MARK A. OBER AS STATE ATTORNEY OF FLORIDA, CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY FLORIDA CIRCUIT CIVIL COURTS, MANUEL MENENDEZ JR. Individually, WAYNE TIMMERMAN, Individually, JUDGE WAYNE TIMMERMAN A CIRCUIT COURT JUDGE OF HILLSBOROUGH COUNTY FLORIDA, RAUL PALOMINO, Individually, JUDGE RAUL PALOMINO, A CIRCUIT COURT JUDGE FOR 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, MARVA CRENSHAW, Individually, JUDGE MARVA CRENSHAW, 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, MS. "DOE" LIEMAN, MS. "DOE" LIEMAN, Individually, THE FLORIDA BAR TAMPA INTAKE STAFF EMPLOYEE MS. JANE CRISTY and Ms. JANE CRISTY, Individually, THE STATE OF FLORIDA, CHARLES H. SCRUGGS III, Individually, CHARLES H. SCRUGGS, III as Attorney and CHARLES H. SCRUGGS P.A. Heather Gray, Individually and Heather Gray, Attorney and Heather Gray P.A and

240. Comes now Plaintiff Randall Townsend and Sues Defendants CHARLES H. SCRUGGS, INDIVIDUALLY, ATTORNEY CHARLES H. SCRUGGS, III, CHARLES H. SCRUGGS P.A and CHARLES DENNY, IV, Individually and as Attorney at law, A. JAMES ROLFES, Individually and As Attorney At Law and DICKINSON & GIBBONS, P.A., Drew Gardner, Individually, and Drew Gardner, Attorney At Law and David Gibbs, III, Individually, and David Gibbs, III, Attorney At Law, and The GIBBS LAW FIRM, and the CHRISTIAN LAW ASSOCIATION, Ronald Beck, individual, Ronald L. Beck as Corporation Senior Pastor, Geoff Smith, Individual, Geoff Smith, Corporation Trustee/President, Joe Howlett, Individual, Joe Howlett, Corporation Trustee, Gary Leatherman, Individual, Gary Leatherman, Corporation Trustee and Tim Jeffers, Individual, and Tim Jeffers Corporation Trustee and Herman Meister, Individual, and Herman Meister as Pastor of School Ministries CPCS. 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, STACEY TURMEL, Individually, STACEY TURMEL AS ATTORNEY AT LAW, OF STACEY TURMEL, P.A., THE LAW FIRM OF STACEY TURMEL, P.A., MR. CHARLIE CRIST, Individually, MR. CHARLIE CRIST, AS GOVERNOR OF THE STATE OF FLORIDA, MR. CHARLIE CRIST, AS IN THE OFFICIAL POSITION AS THE ATTORNEY GENERAL FOR THE STATE OF FLORIDA, 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 SHERIFF JOE HOWLETT AND DEPUTY SHERIFF MIKE SMOAK
AND DEPUTY SHERIFF SCOTT WELLINGER, Individually, SCOTT WELLINGER,
AS A HILLSBOROUGH COUNTY SHERIFF DEPUTY SERGEANT,
DEPUTY SHERIFF LUTHER CORE, Individually, LUTHER CORE AS
HILLSBOROUGH COUNTY SHERIFF DEPUTY DETECTIVE EXECUTIVE
SUPPORT DEPARTMENT INTERNAL AFFAIRS, DEPUTY SHERIFF PAUL J.
GUARINO, Individually, PAUL J. GUARINO, AS HILLSBOROUGH COUNTY
SHERIFF DEPUTY SERGEANT PROPERTY CRIMES UNIT, DEPUTY HARRY
HOOVER, Individually, HARRY HOOVER, AS HILLSBOROUGH COUNTY
SHERIFF DEPUTY SERGEANT FOR INTERNAL AFFAIRS, JIM COATS, AS
SHERIFF OF PINELLAS COUNTY FLORIDA, DEPUTY SHERIFF JOSEPH A.
GILLETTEE, SERGENT ADMINISTRATIVE INVESTIGATIONS DIVISION
PINELLAS COUNTY SHERIFF' OFFICE, DEPUTY SHERIFF TIM JEFFERS,
THE PINELLAS COUNTY SHERIFF'S OFFICE, BOB WHITE, AS SHERIFF OF
PASCO COUNTY FLORIDA, DEPUTY SHERIFF JOHN MICHEAL CORBIN OF
PASCO COUNTY FLORIDA, THE DEPARTMENT OF THE PASCO COUNTY
SHERIFF, THE CHIEF OF POLICE OF TAMPA, FLORIDA, and 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, THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT CURTIS BAUGHMAN, Individually, NANCY LOPEZ, Individually, CURTIS BAUGHMAN AND NANCY LOPEZ AS EMPLOYEES OF VICTIMS ASSISTANCE OF THE STATE ATTORNEY OF FLORIDA, THE DEPARTMENT OF VICTIMS ASSISTANCE MARK A. OBER, Individually, MARK A. OBER AS STATE ATTORNEY OF FLORIDA, CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY FLORIDA CIRCUIT CIVIL COURTS, MANUEL MENENDEZ JR. Individually, WAYNE TIMMERMAN, Individually, JUDGE WAYNE TIMMERMAN A CIRCUIT COURT JUDGE OF HILLSBOROUGH COUNTY FLORIDA, RAUL PALOMINO, Individually, JUDGE RAUL PALOMINO, A CIRCUIT COURT JUDGE FOR 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, MARVA CRENSHAW, Individually, JUDGE MARVA CRENSHAW, 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, MS. "DOE" LIEMAN, MS. "DOE" LIEMAN, Individually, THE FLORIDA BAR TAMPA INTAKE STAFF EMPLOYEE MS. JANE CRISTY and Ms. JANE CRISTY, Individually, THE STATE OF FLORIDA, Heather Gray, Individually, Heather Gray Attorney and Heather Gray P.A. and alleges:

241. Plaintiff re alleges all paragraphs above and below and incorporates them herein.

242. This cause of action is for damages within the jurisdiction of this Court and for damages yet fully known without Court Ordered Discovery of Documents being concealed by Defendants herein from this Member as Plaintiff Townsend.

243. Plaintiffs alleges as a member of the First Baptist Church of Citrus Park Plaintiffs are granted per the Contract Rights of the BY-LAWS ARTICLE I. Sec. 2 "The members of the corporation shall consist of the members of the First Baptist Church of Citrus Park." Sec. 4. "The membership present at any regular or special called business meeting shall constitute a quorum for the conduct of the business of the church, when due notice has been given." Article II. Section 4. "...No deed or mortgage of the corporation's property shall be executed except upon resolution adopted at a meeting of the members of the corporation."

244. Plaintiff Townsend alleges that due to the fraudulent position, advice, legal actions, and false misrepresentations as to material facts or knowingly concealment of all or part of material information from this Plaintiff by first Sheriff Deputy Joe Howlett and Jeffers intentionally, knowingly, recklessly and negligently violating the Fourth Amendment rights and BY-LAWS rights of this Plaintiff and “misusing his color of uniform” intending to inflict emotional fear and danger of Plaintiff’s and others and doing gross negligent and great indifference to persons, property and the rights of others but acting to protect his personal interests as a trustee and as a employee of the Hillsborough County Sheriff’s Department and his co-conspirators and that the exposure of the allegations by Plaintiff Townsend would lead to his loss of employment, pension, and possible incarceration and loss of reputation and then the continued fraud of Attorney Denny giving “Benefit to Clergy” as Defendants in Breach of the Duties of the Contract BY-LAWS over the Dutiful Rights of or to this Plaintiff and to the Courts and to the General Voting Members by not allowing this now “newly discovered rights” of this Plaintiff Townsend as still a member being fraudulently concealed by the coercion and fraudulent and knowingly, intentionally, recklessly and negligently actions to conceal these Corporations Business Meeting Records just produced on June 12, 2006, that this Plaintiff as a member of the Corporation was denied his total rights to know of meetings, attend meetings, speak at meetings, ask questions at meetings, lead as the Chairman of the LRPC, participate as Awana Commander to protect the interests of the over 200, children and workers and continue his investigation of the unlawful and violations of the BY-LAWS of these Officers and to continually questions these OFFICERS of the Corporation per the BY-LAWS and the Florida Statues to attend, speak, or ask questions

and vote to protect his membership rights as Granted per the BY-LAWS ARTICLE III. Section 7, and that the “DUE PROCESS” Right was violated by the Pastors Schisms I & II, through frauds to this member, his family and the General Voting Members causing deceptions and damages.

245. Plaintiff alleges that the January 2003, BUSINESS MEETING MOTION for a full and complete investigation of the officers of the Corporation was Quashed, fraudulently manipulated and falsely reported per the April 3, 2000, REPORT OF THE PERSONNEL COMMITTEE and the testimony of the Trustee Gary Leatherman acting on the Personnel Committee blocked the Committee from fact finding regarding his self interests of the reporting of missing accounts and actions to conceal the missing monies just reported to this Plaintiff in June and July 2006 and reports show the General Voting members still are deceived about these secret accounts and misappropriation of funds by the Schisms.

246. Plaintiff alleges that as the Long Range Planning Committee Chairman being unduly removed from this position by the Fraudulent unlawful deceptions and violations of the BY-LAWS due process that the Corporation of the First Baptist Church and this Plaintiff have been deceived and suffered damages even incurring DEBT due to the Coercion and “Benefit of Clergy”.

247. Plaintiff alleges that all financial debt of the Corporation would not have occurred but for the “Benefit of Clergy” and frauds by Grant, Gibbs, Gardner, Scruggs, Gray, Rolfes, Denny of themselves as individuals and as attorneys and as their or of their Law Firms ignoring their legal and Constitutional Duties in fraud with the “pastors Schism I & II” trying to suppress and omit the truthful disclosure of the truth of this Plaintiff to the General Voting Members prior to any vote of said members and each Judge, Agent,

Agency, Department, Corporation and State Office and all Defendants negligently, recklessly, knowingly and intentionally allowed the damages to these Plaintiffs.

248. Plaintiff allege that therefore all the VOTES of the GENERAL VOTING MEMBERSHIP have been gained by FRAUDULENT BUSINESS PRACTICES AND OMISSIONS OF TRUTHFUL DISCLOSURE, since September 8, 1999, are invalid and specifically the votes of the July 2, 2000, REVISED BY-LAWS and the vote or votes of Mortgages for any building projects were denied by the Coercion of Attorney Denny in violation of his Fiduciary duty to be truthful to the Clients of the Corporation vested with rights per the By-laws and that the Actions of attorney Denny and the firm of Dickinson & Gibbons, did show “Benefit to clergy” and thereby granted superior rights of speaking or voting by fraudulent actions and omissions of truthful disclosure in Breach of Fiduciary Duty by the Corporation Trustee’s and Officers as Pastors knowing that the Voting to revise the BY-LAWS was being done to remove rights from the General Voting Member and give undue privileges to the Corporation Officers.

249. Plaintiff further alleges that Attorney Denny denying the Rights of this Plaintiff Townsend per the By-Laws, did give “BENEFIT TO CLERGY” to extend the fraudulent business practices now revealed by the production of the Corporation Credit card billings of the uses allegedly approved by Ron Beck but reveal concealed “pecuniary gain” and unlawful loans to an officer of the Corporation in violation of the rights of the General Voting Members to have knowledge of or approve these unrevealed “secret accounts”.

250. Plaintiff Townsend further alleges that the Firm Of DICKINSON & GIBBONS upon being duly informed by Plaintiff Townsend conspired and negligently managed and approved the malfeasance of Attorney Denny to this plaintiff and to the Courts and to the

General Voting Membership and did not take sufficient or reasonable cause or care to rightfully undo these actions to properly notify or protect the rights due to these clients and thereby become vicariously liable by their conduct or lack thereof.

251. Plaintiff Townsend further alleges that Pastors Schisms I & II, jointly conspired with Attorney Denny and greatly benefited thereby to do financial damage and loss to the General Voting Members by the deception and damages illegally obtained from the General Voting Members and this Plaintiff and by fraudulent practices did set in motion actions of others with malicious intent to fraud and damage this Plaintiff Townsend in the Public's eye and in his places of Employment and thereby caused loss of employment and damages.

252. Plaintiff alleges per **DEMETREE v. STATE** 89 So2d 498 (Fla. 1956) that each defendant herein intentionally, knowingly, recklessly and negligently violated the rulings of Judge Palomino in cases 01-15813, and 01-15814, jointly releasing any and all **INJUNCTIONS** on November 15, 2001, against this Plaintiff, and even advising Defendants of violations of the rights of this Plaintiff but by fraud Defendants conspired and omitted truthful disclosure of the Rulings of the Honorable Judge Palomino and instead continued and increased the limitations of Plaintiff's RIGHTS TO AND WITH HIS CHILDREN and Access on Public Property and potential opportunity to restore his family rights and conveyed fraud in the statements to the Courts as recorded in the **FIRST AFFIRMATIVE DEFENSES** with malicious intent to continue and cause additional fraud and damages to this Plaintiff including the **DIVORCE AND INJUNCTIONS** rulings gained by Attorney Scruggs with Judge Timmerman in November 2003, which still damage this father to not be able to see his children now since November 8, 2002.

253. Plaintiff therefore alleges that the Corporation and this Plaintiff “should be made whole” and “debt free” including all principle sums and interests of any and all mortgages but for the losses incurred by the deceptions of the Defendants herein as the Directive Rights of the General Voting Members to this Chairman of the LRPC before Plaintiff Townsend was removed September 8, 1999, by the frauds of the “pastors schisms” was to proceed with all projects but remain debt free and therefore the demand of “show me the money” and the fraudulent attempts and deceptions of the now newly discovered over \$214,000.00 unreported in periods 2nd, 3rd, 4th, Quarterly Business Meetings and Yearly Business Meeting as required by the BY-LAWS did lead to the damages incurred. Each Business Meeting shows proof of conspiracy to defraud and by Plaintiff being banned from each meeting the conspiracy of the Pastors Schism I & II and with Attorney Denny and his firm these Defendants have prospered thereby at the suffering of this Plaintiff and the General Voting Members and others.

254. Plaintiff further alleges that each and every one of the representations set forth in the preceding paragraphs concerned material facts for the reason that Plaintiff would not have been barred from his family, his children, his Voting Rights, his Positions of Leadership, his honored reputation, and his employment and future employment(s).

255. Further, Plaintiff and others relied on each and every one of the defendant’s representations that resulted in Plaintiff’s substantial injury and damages as described more fully below. In this connection, Plaintiff and Plaintiff’s Friends the Minor General Voting Members further alleges that Defendants purported to have and did have superior knowledge concerning the subject matter of the transactions described above, and Plaintiff justifiably relied on Defendant’s superior knowledge.

256. By reason of Plaintiff's reliance on Defendants representations and fraudulent concealment of material facts and injurious falsehoods as described above, Plaintiff has been damaged in an amount far in excess of the minimum jurisdictional limits of this Court. Plaintiff alleges that Plaintiff paid over \$10,000.00 in legal fees, costs and court reporter fees, lost equity in the marital home, lost profits of fair market value in the marital home in excess of \$100,000.00, lost over \$60,000.00 of unpaid employment commissions from SunBelt Equipment Company, lost the opportunity per the State Attorney to Sue SunBelt for defamation and lost income in a suit in excess of \$1,000,000.00, lost marital rights, lost child society rights and custody, lost an honorable reputation, lost employment at Kmart as a Level II store manager, lost profit sharing and lost insurance and lost retirement income and incurred debt in an still unknown amount and further lost valuable time in a relationship and incurred lack of use of the assets of the corporation members embezzled by the fraud of the pastors, trustees and adult voting members as shown and named herein and lost use of the building and expansion program but for the fraud and fault of negligent and tort intentional, reckless and malfeasance of officers, alleged trustees, pastors and other general voting members knowingly acting in negligent breach of the FBCCP BY-LAWS.

257. WHEREFORE, the Plaintiff demands trial by jury on all issues so triable and prays this Court will award an Immediate WRIT OF PROHIBITION against all defendants herein stopping their violations of laws and award a judgement and award damages including:

A. The offset of all FBCCP Corporation indebtedness due to the fraudulent voting and other actions of the Schism to deceive this Plaintiff and the Minor General Voting Membership against Defendants, Ronald L. Beck, individually, Rev. Ronald L. Beck as senior pastor of First Baptist Church of Citrus Park and

Trustee Geoff Smith, Trustee Joe Howlett, Trustee Gary Leatherman and Trustee Tim Jeffers and Pastor Herman Meister and Defendant Charles Denny, IV, individually, Charles Denny, IV. Attorney at Law, A. James Rolfes, Individually and A. James Rolfes, Attorney at Law and DICKINSON & GIBBONS, P.A., and each attorney as “DOE” as Individual and as Attorney and Attorney Firm for assisting the frauds of Clergy and Alleged trustees and others

- B. For General Damages, according to proof.
- C. For an award of damages per §57.105(3) “for its reasonable expenses incurred in obtaining an order, which may include attorney’s fees and other loss resulting from the improper delay”.
- D. For an award of Sanctions against Attorneys per §57.105(4) and §57.105(5).
- E. For the Following Special Damages:
- F. For approximately \$10,000.00 in legal fees, costs, and court reporter fees,
- G. Lost of equity in the marital home, lost profits of fair market value in the marital home in excess of \$100,000.00,
- H. Lost of over \$60,000.00 of unpaid employment commissions from SunBelt Equipment Company.
- I. Loss of the opportunity per the State Attorney to Sue SunBelt for defamation and lost income in a suit in excess of \$1,000,000.00 due to the allegations of defendants herein during the statue of limitation periods
- J. Loss of marital rights,
- K. Loss child society rights and custody,
- L. For Battery
- M. Loss of an honorable reputation,
- N. Loss of employment at Kmart as a Level II store manager, and lost profit sharing and lost insurance and lost retirement income and incurred debt in an still unknown amount and lost ability to earn future income
- O. For costs of suit incurred in this action.
- P. For intentional infliction of emotional distress and
- Q. For intentional infliction of child custody and visitation in Society. As this father was and is prohibited from his children as the Injunctions are still being enforced by frauds.
- R. For other and further relief as the court may deem proper.

COUNT XVII

NEGLIGENCE--AGAINST ALL AGENCIES AND DEPARTMENTS AND STATE ORGANIZATIONS AND CIRCUIT COURTS OF THE THIRTEENTH CIRCUIT OF THE STATE OF FLORIDA-- THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA UNDER THE CARE AND SUPERVISION OF JEB BUSH AND CHARLIE CRIST; THE DEPARTMENT OF THE ATTORNEY GENERAL FOR THE STATE OF FLORIDA; THE DEPARTMENT OF FINANCIAL SERVICES; THE DEPARTMENT OF CHILDREN AND FAMILIES OF THE STATE OF FLORIDA; THE HILLSBOROUGH COUNTY SHERIFF’S DEPARTMENT OF THE STATE OF FLORIDA; THE PINELLAS COUNTY SHERIFF’S DEPARTMENT OF THE STATE OF FLORIDA; THE PASCO COUNTY SHERIFF’S DEPARTMENT OF THE STATE OF FLORIDA; THE CITY OF TAMPA POLICE DEPARTMENT;

FLORIDA DEPARTMENT OF LAW ENFORCEMENT; MARK A. OBER AS STATE ATTORNEY OF HILLSBOROUGH COUNTY FLORIDA; CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOURGH COUNTY FLORIDA CIRCUIT CIVIL; THE THIRTEENTH CIRCUIT COURTS OF JUDGES RAUL PALOMINO, WAYNE TIMMERMAN, FRANK GOMEZ, MONICA SIERRA, MARVA CRENSHAW, GREG HOLDER, RALPH STODDARD, THE OFFICE OF THE GENERAL COUNSEL TO THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA; THE JUDICIAL QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA; THE FLORIDA BAR; THE STATE OF FLORIDA; THE CITY OF TAMPA; HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA.

257.**COMES NOW** Plaintiff Randall Townsend sues Defendants THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA UNDER THE CARE AND SUPERVISION OF JEB BUSH AND CHARLIE CRIST; THE DEPARTMENT OF THE ATTORNEY GENERAL FOR THE STATE OF FLORIDA; THE DEPARTMENT OF FINANCIAL SERVICES; THE DEPARTMENT OF CHILDREN AND FAMILIES OF THE STATE OF FLORIDA; THE HILLSBOROUGH COUNTY SHERIFF'S DEPARTMENT OF THE STATE OF FLORIDA; THE PINELLAS COUNTY SHERIFF'S DEPARTMENT OF THE STATE OF FLORIDA; THE PASCO COUNTY SHERIFF'S DEPARTMENT OF THE STATE OF FLORIDA; THE CITY OF TAMPA POLICE DEPARTMENT; FLORIDA DEPARTMENT OF LAW ENFORCEMENT; MARK A. OBER AS STATE ATTORNEY OF HILLSBOROUGH COUNTY FLORIDA; CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOURGH COUNTY FLORIDA CIRCUIT CIVIL; THE COURTS OF THE THIRTEENTH JUDICIAL CIRCUIT AS STATED HEREIN, THE OFFICE OF THE GENERAL COUNSEL TO THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA; THE JUDICIAL QUALIFICATIONS COMMISSION OF THE STATE OF FLORIDA; THE FLORIDA BAR; THE STATE OF FLORIDA; THE CITY OF

TAMPA; HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA.

258. Plaintiff Randall Townsend is an individual at P.O. Box 21, Odessa, FL, 33556, in

Hillsborough County Florida and Plaintiffs full restate all paragraphs above and

below and incorporate herein this Court granting full rights to Plaintiffs to sue:

259. Defendants are agencies of the State of Florida. Plaintiff presented a claim in writing

to Defendants and the Department of Financial Services, in compliance with Section

768.28 of the Florida Statutes, on or about August 2006, and at various previous times

by written and verbal requests for each agency to assist Plaintiff reveal and recover from

all losses as stated herein. Defendants below are being sued for negligent training of

employees and agents performing negligent actions per their alleged duty and thereby per

Respondent Superior each agency violated Florida Statutes §775.03 and gave unlawful

“Benefit to Clergy” and thereby became joint tortfeasor’s to and with all unlawful actions

of Defendants as “Clergy” and deprived this Plaintiff his Constitutional RIGHTS AND

FREEDOMS AND PRACTICE OF HIS RELIGION and BY-LAWS RIGHTS as stated

herein because by NON ACTIONS OF PROTECTIONS OF THIS PLAINTIFF EACH

DEFENDANT ALLOWS FRAUDS BY A PERSON OR GROUP OF PERSONS WHO

ALLEGE TO BE “CLERGICAL” BUT VIOLATE CRIMINAL, CIVIL LAWS AND

STATUTES. Each agent on behalf of the Department or Agency “made a deliberate

decision of the government official to deprive a person of life, liberty, or property” per

CROCKER v. PLEASANT 778 So2d 978 (Fla. 2001). The Florida Supreme Court

identified the “RISK” of creating a superior position in **MALICKI v. DOE** 814 So2d

347 (Fla. SCt. SC01-179) March 14, 2002. **ALLEN v. PORT EVERGLADES**

AUTHORITY 553 So2d 1341 (Fla. 4th DCA 1989) set the standard at “once a public

entity knows or should have known the danger it created, the entity has the duty to warn of that danger.” This Claim has been verbally denied by each agent on behalf of the Department or Agency and or was formally denied or is pending as shown below herein:

- A. THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA AS UNDER THE CARE AND SUPERVISION JEB BUSH AND CHARLIE CRIST.
- B. THE OFFICE/DEPARTMENT OF THE ATTORNEY GENERAL FOR THE STATE OF FLORIDA, being sued under Florida Statues §16 and others and verbally denied any claims.
- B. THE DEPARTMENT OF FINANCIAL SERVICES, being sued under Florida Statues §18 and others and verbally denied any claims.
- C. THE DEPARTMENT OF CHILDREN AND FAMILIES OF THE STATE OF FLORIDA and is a department of the executive branch of the government of the State of Florida created by Florida Statues Section 20.19 and others and verbally denied any claims.
- D. THE HILLSBOROUGH COUNTY SHERIFF’S DEPARTMENT OF THE STATE OF FLORIDA, being sued under Florida Statues §30 and others and verbally denied any claims.
- E. THE PINELLAS COUNTY SHERIFF’S DEPARTMENT OF THE STATE OF FLORIDA being sued under Florida Statues §30 and others and verbally and in writing denied any claims.
- F. THE PASCO COUNTY SHERIFF’S DEPARTMENT OF THE STATE OF FLORIDA, being sued under Florida Statues §30 and others and verbally denied any claims.

- G. THE CITY OF TAMPA POLICE DEPARTMENT, being sued under Florida Statutes §166.021 and others and verbally denied any claims.
- H. FLORIDA DEPARTMENT OF LAW ENFORCEMENT, being sued under Florida Statutes §20.201 and others and verbally denied any claims.
- I. MARK A. OBER AS STATE ATTORNEY OF HILLSBOROUGH COUNTY
FLORIDA, being sued under Florida Statutes §16 and others and verbally denied any claims.
- J. CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY
FLORIDA CIRCUIT CIVIL, AND CIRCUIT CIVIL COURT JUDGES RAUL
PALOMINO, WAYNE TIMMERMAN, FRANK GOMEZ, MONICA SIERRA,
MARVA CRENSHAW, GREG HOLDER, RALPH STODDARD,
ARE being sued under Florida Statutes §26 and others.
- K. RAQUEL A. RODRIQUEZ AS GENERAL COUNSEL TO THE OFFICE OF THE
GOVERNOR OF THE STATE OF FLORIDA, being sued under Florida Statutes §16
and others and verbally and in writing denied any claims.
- L. THE JUDICIAL QUALIFICATIONS COMMISSION OF THE STATE OF
FLORIDA, being sued under Florida Statutes §25 and others and verbally and in
writing denied any claims.
- M. THE FLORIDA BAR, being sued under Florida Statutes §25 and others and verbally
denied any claims and reportedly by Ms. Lieman did “throw in the trash” the
complaint received and signed for by Jane Christy via certified mail on November 21,
2005. Complaint was filed per the directives of Ted Littlewood of the FLA. Bar.
- N. THE STATE OF FLORIDA, being sued under Florida Statutes §2, 6, and others and

verbally and in writing denied any claims.

O. THE CITY OF TAMPA, is a municipal corporation in the State of Florida and may be sued as such pursuant to Florida Statutes Section 166.021 and others and 125.15.

Claim pending.

P. HILLSBOROUGH COUNTY FLORIDA, OF THE STATE OF FLORIDA, is a political subdivision of the State of Florida and may be sued as such pursuant to

Florida Statutes Section 125.15. Claim Pending.

GENERAL ALLEGATIONS

260. Plaintiff allege all previous allegations and paragraphs stated above herein.

261. Plaintiff alleges that by the appearance of Sheriff Deputy Howlett and Sheriff Deputy Tim Jeffers “Color of Uniform” and intentional use of the “Color of Uniform” to serve their own “pecuniary purpose” wearing the Uniform of a Deputy both “on duty and off duty” to the General Public and General Voting Member, the Agencies and Departments herein have failed to warn this Plaintiff and the Minor General Voting Members of these appearing to be “security guards” who at will place their personal interests over the rights of the Corporation they allegedly serve and the Minor General Voting Members of this Corporation whose members must be fully informed and allowed to vote after being fully informed but said deputies as acting allegedly lawfully per the BY-LAWS as properly elected and voted to serve as trustees by the BY-LAWS process As of ARTICLE II, as these unlawfully appointed TRUSTEE’S have knowingly concealed breach of duty of themselves and of the clergy and of other officers, law enforcement, employees and others to the Corporation, General Voting Member, the general public and to the BADGE they swore to protect under the Constitution of the United States, the State of Florida or

to their Department or to the FBCCP BY-LAWS they allege to protect. Per **PITTS v. METROPOLITAN DADE COUNTY** 374 So2d (Fla. 3 DCA 1978) and **CUTLER v. CITY OF JACKSONVILLE BEACH** 489 So2d 126 (Fla. 1st DCA 1986) a false security and lack of “risk” is presented by the coercion of Deputies Howlett and Jeffers and thus a veil of frauds and deceptions and damages resulting to this Plaintiff, the FBCCP Corporation and the General Voting Members. These agencies refusing to “supervise” or investigate their own required this action to enjoin these Defendants as “Joint tortfeasors” due to the failure to train, supervise, control and warn to prevent the “Risk” of Operational decisions made by the coercion of these Deputies and their intent for personal protection and private gain thereby and negligence and breach of duties and damages caused from the deception and resulting damages. Further, The failure of the Judicial Qualification Commission, The Florida Bar, The FDLE, The Attorney General and the State Attorney of Hillsborough County by failing the Duty to train, manage, supervise and investigate and prosecute violates their duty per the Florida States and Federal Statues as stated in all paragraphs in this Complaint and has allowed the violations of laws as stated herein by attorneys, judges and law enforcement.

262. PER **U.S. v. Leisure, C.A.8 (MO.)** 1988, 844 F.2d 1347, stating,
“It is only necessary for defendant to have believed that witness might give information to federal officials, and to have prevented that communication, to violate statue governing obstruction of criminal investigations.”

263. Plaintiff has met his duty to warn the Hillsborough County Sheriffs Department Deputies of D-#3 District Office to multiple Sergeants and Detectives since September 1999, and to FDLE, the State Attorney, the Attorney Generals Office, Courts and other agencies at multiple other times and these Agencies continue(d) the Negligent hiring and retention and supervision of these Howlett, Jeffers, Smoak, Corbin, Sanz, Core, and all

judges and attorneys and law enforcement and state officers/agents and others as stated herein acting to violate the rights of this Plaintiff and prevent this plaintiff from seeing his children now partly since October 20, 1999, and permanently now since November 8, 2002, by their actions to “give benefit to clergy” and prevented Plaintiff Townsend from his civil rights of religion, speech and as a father. Each Agency is Vicariously Liable to this Plaintiff for the “Risk” they allows these agents to perform by acts of deceptions and frauds. Per **DEPARTMENT OF HEALTH AND REHAB. SERV. V. YAMUNI** 529 So2d 258 (Fla. 1988) each agency is responsible and “liable for negligence in the investigation and protection of an abused child from further child abuse.” Plaintiff alleges “the statutory duty of care to protect a child from further abuse once it has been notified that abuse has occurred, Sovereign Immunity is waived for a negligent breach of that duty.” And that all agencies, law enforcement, courts and judges and attorneys have the duty of care to protect a child. The Principles of the TORT CLAIMS ACT not allegedly applying to Agencies for Operational Decisions then is in Violation of **1863** and coercion when all agents in collusion refuse to act.

264. Further per Florida Statue 39.205, Failure to report or act on violations of law is a violation and breach of duty and per the August 2004, exchange in the hearing between Attorney Stanford Solomon and Judge Gomez as to the responsibilities of attorneys and judges, “once your in your in” and Judge Gomez agreed that the attorneys and courts had a duty to report and represent the full issues of the cases as shown herein wherein therefore Judge Gomez did recuse himself, however having already ruled in these matters and concealed these matters did incriminate himself by the exparte actions with Attorney Scruggs as stated in the Transcripts in the court of

Judge Gomez and thereby continuing the veil of deceptions continues the frauds as other courts (Hillsborough Circuit Civil) judges (Sierra, Timmerman, Crenshaw, Palomino, Holder, Stoddard, Arnold, Menendez Jr.) and Appeals Court Second District Judges Villanti, Wallace and Larose per the ORDER of the Second District Court in Appeals Case **TOWNSEND v. Scruggs et al.** 2D06-2811 to continue to do concealment of torts and frauds and knowingly and recklessly allowing “Benefit of Clergy” and actions of the employee Karen Harrod Townsend and deputies Howlett and Jeffers and others under the direct and indirect responsibility of attorneys Denny, Scruggs and Gray to still prevent the rights and continue the damages of plaintiffs as stated herein by the induced fraudulent “INJUNCTIONS” and omissions of truthful disclosure carried forth by attorneys Denny, Scruggs, Gray, Turmel, Rolfes and the Judges so stated of the Thirteenth Circuit Court Timmerman, Gomez, Sierra, Holder, Stoddard, Crenshaw even after Plaintiff Townsend has from October 2003, to present filed over FIFTY MOTIONS, PETITIONS and COMPLAINTS showing these Injunctions and Court orders were gained by frauds of Alleged Clergy Beck and frauds of Howlett, the former wife Karen Harrod Townsend and the intentional extrinsic fraud of Attorney Scruggs, Gray, and Denny and others and further to continue to allow the weekly frauds and embezzlement and extortion of rights of these Plaintiffs as members of the Corporation being intentionally misinformed of breach of duties and frauds of the alleged pastors and alleged trustees and Grant as the Registered Agent and Denny and Rolfes and Gibbs and Gardner allegedly honorably serving the interests of the voting members but for the lack of intervention of these courts the injustice and frauds continue in violation of Florida Statutes 617.

265. This is an action in negligence, with Plaintiff seeking damages in excess of the jurisdictional minimum of this Honorable Court.

266. At approximately September 8, 1999, Plaintiff was per his duty to the Corporation of the First Baptist Church of Citrus Park and the General Voting Member and to his children was required to confront Officers of the Corporation for various actions alleged as fraud, negligence, breach of duty. Plaintiff at the “Show me the money” demand meeting became the victim of retribution by Sheriff Deputy Joe Howlett and Sheriff Deputy Tim Jeffers using their positions as “COLOR OF UNIFORM” sheriff deputies and their dual role as alleged Officers of FBCCP to allege that Plaintiff had become “violent”, “abusive”, “potentially dangerous”, “suffering from a stress related breakdown”, “a liar” and leading to the allegations of “molesting” his own children and marital “abuse”. Deputies Howlett and Jeffers and Smoak, at times did unlawful car chases and unlawful stops using their Department issued vehicles, and created scenes throughout the community, the church, the private Christian school, at the mall, in the Court of Judge Raul Palomino and told fraud to Curtis Baughman of Victims Assistance, and at other places, to create the injurious falsehoods and conceal the frauds of Deputies Howlett, Jeffers, Smoak, Corbin and others as officers, Kaeras to create fear and infliction of emotional distress to persons and to this plaintiff and plaintiffs family and children to protect the Deputies unlawful acts to “Benefit Clergy” to continue violations of this Plaintiff, his children, the FBCCP and CPCS Minors, the Corporation and others.

267. As a direct and proximate result of this activity, Plaintiff was abused against his FOURTH AMENDMENT RIGHTS, Abused in the public eye, incurred unlawful interference with and of lost Child Custody and Society privileges, loss of employment,

loss of future earning capacity due to abused reputation and defamation, loss of medical, dental insurance and retirement benefits, loss of his home, loss of consortium, loss of emotional and physical and mental well being and incurred financial debt and financial loss and incurred multiple lawsuits and is still severely injured as more particularly described throughout in this Complaint and all facts and damages are incorporated herein.

268. Plaintiff alleges that each agency is directly and proximately the cause of Plaintiffs injuries by the failure and breach of duty to train, supervise, investigate, advise of risk, protect from risk, warn of new dangers, despite being advised of criminal activities by these Deputies since 1999 and each agency has had sufficient warning of the existence of the hazardous conditions and of numerous similar incidents that had been caused by the breach of duties at multiple times by these alleged now TRUSTEE'S of the FBCCP Corporation and nonetheless the Department, and Agencies herein failed to act. Florida Statutes required the office of the Attorney General and STATE LAW ENFORCEMENT to supervise, investigate and enforce the Corporations operating under Florida Statue §617.

269. This action is maintained according to the principles of law as stated in this Complaint, a governmental entity is not protected by sovereign immunity when it is performing such operational level functions as proper duty of officers and agents to obey all criminal and civil laws at all times rather than use the "Color of Uniform" in the operation of a breach of duties as shown above herein and Defendants cannot claim sovereign immunity.

270. As a direct and proximate result of Defendant's actions and omissions, as alleged and itemized above, Plaintiff Suffered and Continues to Suffer all losses as stated herein. Plaintiffs injuries are so severe and so complicated in nature that Plaintiffs recovery will

be extensive, and Plaintiffs has suffered and will continue to suffer great mental anxiety and battery and distress in addition to severe and chronic physical pain and suffering, for the indefinite future.

271. Wherefore, Plaintiff demands judgement as follows:

- A. For General Damages.
- B. For Nominal Damages
- C. For Punitive Damages
- D. For All Special Damages as proved herein in the amount still to be determined upon discovery but known to exceed all jurisdictional minimums.
- E. For costs of suit incurred in this action.
- F. For other and further relief as the Court may deem proper.

COUNT XVIII
INTERFERENCE WITH EMPLOYER-EMPLOYEE RELATIONSHIP
RESULTING IN DISCHARGE OF EMPLOYEE
AGAINST ALL DEFENDANTS

Plaintiff Randall Townsend alleges:

272. Plaintiff is a resident of Hillsborough, Sarasota and Pinellas County, Florida at times material hereto and restates herein all paragraphs above and below herein.

273. Defendant Kmart Management Corporation of 3100 West Big Beaver Road, Troy, Michigan, 48084, and now doing business as SEARS HOLDING COMPANY with a REGIONAL OFFICE LOCATION AT 1602 West Brandon Blvd, Brandon, Florida.

274. All Defendants as stated in paragraphs 23-55 and 57 are incorporated herein.

275. This is an action in excess of the jurisdictional minimum and limits of the court.

276. On or about December 16, 1999, Plaintiff Townsend entered into a employment contract whereby Plaintiff was hired as Defendant Kmart's employee. Specifically, Plaintiff was hired as Pantry Manager and at various times hereto did receive advancement and promotions resulting in the position of Level II Store Manager until Plaintiff Townsend was terminated on or about October 6, 2005.

277. Each Defendant through verbal communications, letters, affidavits, court testimony or by personal encounters and by joint tortfeasor actions knew and should have known of Plaintiff Townsend's employment and in the Affidavit of Ron Beck of October 31, 2001, Defendant Beck states in the Affidavit as a record of public document that Plaintiff Townsend is employed at KMART and at various times Defendants visited or shopped at Plaintiff Townsend's place of employment.

277. Each Defendant by allowing benefit of clergy who by fraud and omissions of truthful disclosure to conceal and conspire to continue frauds and other criminal acts alleging Plaintiff Townsend was "dangerous", a "liar", "suffering from a mental and stress related breakdown", a "molester", an "abuser" or of any improper character to paint this Plaintiff in a bad public eye did and does contribute to cause slander and disgrace of Plaintiff Townsend as unbecoming of a Store Manager expected quality and character in the public eye. Such painting Plaintiff Townsend in a bad public eye by fraudulent means induced others to fear, use for their own interests and abuse this Plaintiff to serve their own interests which lead to false accusations, slander and false grounds for termination or discharge from employment that if the conduct alleged had come from "clergy" or "attorneys" or "judges" it must be true and show as a pattern of character to further damage those under the management of Plaintiff Townsend.

278. Each Defendant did knowingly, willfully, intentionally and recklessly intend to willfully and wantonly injure or suppress maliciously Plaintiff Townsend and thereby induce Defendant Kmart /Sears to discharge Plaintiff Townsend and is joint tortfeasor to unlawfully giving "benefit to clergy" using false allegations to conceal

criminal actions of “clergy” as stated herein.

279. Plaintiff Townsend was additionally retaliated at by Kmart/Sears Management due to the religious beliefs of Plaintiff Townsend to not commit frauds or lies or violations of Federal and State and Local laws as Management ordered at multiple times Plaintiff Townsend to knowingly violate a Company policy, Federal and State and Local Law and plaintiff alleges his discharge was to conspire to conceal his intent to report illegal acts of Dan Gentile, Shane Pearson, Dr. Linda Rowe-Campbell and Rick Gould and others and Plaintiff Townsend was subjected to racial harassment by actions of employees of Kmart/Sears.

280. As a result of the discharge of employment Plaintiff Townsend has been slandered, humiliated, emotionally suffered, mentally anguished and been deprived of gainful employment in the amount of his 2005, salary of \$63,500.00 annually and of all lost benefits to insurance, profit sharing and retirement and potential for bonus and potential for advancement and increase salary and been deprived of gainful employment at other equal or comparable or alternate employers due to the painting of a bad public image of Plaintiff by all defendants fraud and omissions of truthful disclosure.

281. WHEREFORE, Plaintiff demands judgment as follows:

- A. For General Damages.
- B. For special damages including lost earnings in the amount of \$63,500.00 per year until Plaintiff is gainfully compensated.
- C. For loss of earning capacity and battery
- D. For Punitive Damages since the facts arise to the level of actual malice, willful and wanton intentional interference sought to injure Plaintiff as retaliations against Plaintiff as shown in all paragraphs throughout the Complaint herein.
- E. For any and all other further relief as the Court may deem proper.

COUNT XIX
CONSPIRACY TO INTERFERE WITH LIVEHOOD
AGAINST ALL DEFENDANTS

282. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

283. Plaintiff alleges that as a proximate and direct cause of the intentional, knowing and reckless and negligence by Defendants to not properly represent and intentionally inform as a reasonable care for services as an attorney not using all available causes of actions and advocating the rights of Plaintiff Townsend that Plaintiff Townsend was abused and presented as an unfit candidate of the employer KMART as a Level II store manager and was discharged as a result of allegations against this Plaintiff Townsend that Defendants had a reasonable duty they ignored and did damage to cause fear of the employer to stop Plaintiff Townsend from employment and that this interference was damaging to the advantageous business relationship that Plaintiff Townsend had with his employer and future employers as Defendants conspired to conceal all the allegations known by Defendants as false that were causing damage and was leading to additional allegations that would cause additional fears and damages to the advantageous relationship by prolonged and unsettled legal allegations not clearing the slandered reputation of Plaintiff Townsend.

284. As a proximate and direct cause of Defendant interference to Plaintiffs advantageous business relationships, Plaintiff has been unemployed since October 2005, and has yet to find equal employment after many attempts to regain employment due to the lack of reasonable and proximate care expected by Defendants to protect the reputation and allegations made against Plaintiff Townsend deemed to be fit for employment had these

allegations been proved untrue as stated had Defendant not conspired with Attorney Scruggs and Karen Harrod Townsend and others not yet fully known in their true names in this matter as Defendants designated as Defendants DOE, to withhold proper care for her client as Plaintiff believes and was informed based on information and belief alleges that each of these defendants negligently or otherwise legally responsible for the events and happenings referred to in this complaint and negligently or otherwise unlawfully caused the injuries and damages to plaintiff Townsend alleged in this Complaint as Karen Harrod Townsend admitted in Affidavits that she contacted the employer of Plaintiff Townsend on numerous occasions in violation of the Final Divorce Judgement, Injunctions that Attorney Scruggs and Gray was to reverse and or clarify in the Appeal.

285. As a direct and proximate result of Defendants actions and interference with Plaintiffs advantageous business relationships Plaintiff has experienced termination, mental and physical duress such as sleeplessness, tenseness, nervousness, weight loss and other symptoms related to this stress and infliction of emotional distress, debt and additional loss of time with Plaintiffs children as Karen Harrod Townsend and her maternal family continue to use economic reasons to desecrate the reputation of Plaintiff Townsend and these acts were willfully and maliciously done to destroy the reputation of Plaintiff Townsend by the conspiracy and frauds and therefore constitute a claim for Punitive Damages and other recovery of loss of employment as Plaintiff Townsend lost his \$63,500.00 a year salary and bonus opportunity paying job and lost 30 year excellent reputation.

286. WHEREFORE PLAINTIFF REQUESTS ALL RELIEF FOR DAMAGES AS STATED BELOW HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS

PROPER.

COUNT XX
INFLICTION OF EMOTIONAL DURESS-AGAINST ALL DEFENDANTS

287. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference in this count.

288. Plaintiff's reallege all conditions precedent have been performed or have occurred.

289. Plaintiffs allege Defendants conduct as stated throughout herein allowed Karen Harrod Townsend and Ronald Beck and others as stated herein to state to fellow members at FBCCP, fellow co-workers at CPCS and pastors, doctors and attorneys and Judges of allegations against Plaintiff Townsend as husband and father just to conceal her malfeasance and acts of tort and abuse on these Plaintiff's herein was extreme and outrageous for any citizen and even more so extreme and outrageous for a mother who professed to be of a higher standard as an alleged Christian mother and Christian School teacher allegedly living per the Code of Conduct displayed in her employment contract of CPCS as a Christian School Teacher.(Karen Harrod Townsend hereinafter as "Harrod" and Ron Beck as "BECK" and Herman Meister.

290. Plaintiffs allege Defendants allowed Harrods conduct as intentional, reckless and negligent and with malice and intent to fraud and omit truthful disclosure to cause emotional distress as extortion on her "just and innocent" husband and father of the marital children and a respected leader in the community and that Defendants knew or should have known that such emotional distress and pain would follow from Harrods actions starting in the home in the 1990's and through these current times as that Harrod still continues her frauds and extortion and abusive conduct as

stated herein keeping this father from a clean and free reputation in the public eye and having freedom in his relationships with the marital children as “NEXT FRIENDS” as stated herein and that Harrod intentionally did take away the parental rights of this father in 1999 through current by Harrods frauds and abusive omissions of truthful disclosure and other malfeasance acts as stated herein keeping this father from the many years of lost time with these marital children this father sought and still seeks to protect from the malfeasance acts of this alleged honorable mother and her co conspirators.

291. Plaintiff alleges that Florida Statutes s. 768.35 **Continuing Domestic Violence**, states “A victim as defined in s. 741.28, who has suffered repeated physical or psychological injuries over an extended period of time as a result of continuing domestic violence has cause of action against perpetrator responsible for the violence” and Plaintiff alleges that the acts of Harrod were intentional and abusive acts intended to cause this emotional distress and violence towards this Plaintiff and these children as “NEXT FRIENDS” from these intentional actions by Harrod to destroy the loving home setting just to conceal her acts as stated herein.

292. The true facts is that the transcripts in exhibits herein from the court of Judge Palomino prove this Plaintiff as reported herein has been truthful, loving, caring, honest and has not done one act of alleged violent or physically abusive conduct towards any person but Harrods and others allegations have been pure fraud in an attempt to harm and abuse and conceal malfeasance of her and her co workers and co conspirators as this Harrod, in December 2005, in MOTIONS to Judge Holder in case 05-9605 attempts to recant her allegations began in 1996, and continues with

the help and assistance and knowledge of herself, co conspirators as stated herein.

293. Defendants, and each of them, knew and have known the representations concerning the integrity, character, conduct and public image and public actions of this Plaintiff Townsend that the representations were false; and defendants, and each of them, made the representations with the intent to induce Plaintiff and others as stated herein to rely on these representations and do conduct as stated herein to conceal defendant and her co conspirators actions and procure the Injunction by Judge Timmerman still to harm these Plaintiffs herein and continue the frauds of defendants and her co conspirators.

294. Defendants and each of them, knew when they presented the false testimony and accusations and allegations against this Plaintiff as stated herein and in each exhibit that these allegations by Defendants and her co conspirators was fraud and presented to induce abuse and humiliation against Plaintiff Townsend with the intent to induce others as stated herein and specifically and other points incorporated fully herein to act to humiliate and abuse this Plaintiff and to thus conceal the actions of defendants and the co conspirators as stated specifically and incorporated fully herein.

295. Plaintiffs, in fact, did believe the representations of Harrod and others claims and did in fact seek professional counseling and advice from Doctors, pastors, professional authors, lawyers, judges and multiple advisors in attempts to refute and understand charges by Harrod and Beck as proof of truthful facts and to correct the light of the public eyes as to the truthful facts as alleged herein. Plaintiffs have not been able to get relief or yet know the full amount of defamation and destruction of the public image of Plaintiffs and financial damages and losses from the frauds and

misrepresentations and omissions of truthful disclosure by Defendants to each person as stated herein and other letters and proof had Plaintiffs and others not relied on the truthfulness of the alleged allegations by Defendants and each of them.

296. As a proximate result of the false and fraudulent misrepresentations and actions of the defendants, Plaintiffs have incurred expenses, humiliations and abuse to their persons and reputations in the public eye and this would not have been required had the representations of and reports of and presented information of defendants been true and accurate.

297. As a further proximate result of the false and fraudulent misrepresentations and actions as reported herein of the defendants, plaintiffs incurred valuable lost time and relationships to each other as father and children to parent father and expenses for the litigation and satisfaction of the injunctions and orders gained by the frauds of defendants not being truthful causing harm to these plaintiffs

298. In making the representations and performing the acts alleged, defendants and each of them, acted intentionally with fraud and malice; and plaintiffs are entitled to punitive damages in the sum yet fully unknown to the full extent the laws of Florida allow to the maximum of these Florida Statutes violated by Defendants but estimated at \$2,000,000.00 or more.

COUNT XXI
NEGLIGENCE AND ABUSE OF CHILDREN and REQUEST FOR
IMMEDIATE INJUNCTION- AGAINST KAREN HARROD; STEVEN
HARROD; NORMA HARROD; DONALD HARROD

299. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

300. Plaintiff's reallege all conditions precedent have been performed or have occurred.

301. Plaintiff's allege that Defendants herein this count and as her co- conspirators

HARRODS, (as Karen, Steve, Norma, Don) did intentionally conspire and fraud to jointly abuse and harm Plaintiff and "Next Friends" of Plaintiff these Children J.D.T. and J.G.T and violate these marital children as evidence in these exhibits herein of doctors reports and in the transcripts testimony of the mother and others in violation of s. 827.04, Florida Statutes, **ABUSE OF CHILDREN**, which states, "Whoever, willfully or by culpable negligence, deprives a child of, or allows a child to be deprived of, . . . , or medical treatment, or who knowingly or by culpable negligence, inflicts or permits the infliction of physical or mental injury to a child and in so doing causes great bodily harm. . . shall be guilty of a felony of the third degree, punishable as provided in s. 775. 082, s.775.083, or s. 775.084." And per s. 827.05 Florida Statutes, **Negligent treatment of children**, which states, "Whoever, though financially able, negligently deprives a child or allows a child to be deprived of, . . . , or medical treatment or permits a child to live in an environment, which such deprivation or environment causes the child's physical or emotional health to be significantly impaired or to be in danger of being significantly impaired shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082, s.775.083, or s. 775. 084.by doing the acts against the will of this paternal father as alleged herein and by these specific acts:

A. Of harming these children physically and mentally and emotionally by the verbal and physical conduct of FBCCP, CPCS, and Karen Harrod Townsend advised by Attorney Scruggs the August 1, 2000, Certified Letter to Dr. Lon Lynn demanding by this father that these patients be treated as directed in this

letter however resulted in deprived and below standard of care as reported by Dr. Santiago Hoyos and other professionals willing to testify to the courts.

- B. Of harming these children mentally and emotionally by repeatedly verbally abusing this father and these children
- C. Of harming these children by keeping them in an hostile school and church environment at CPCS and FBCCP, being subjected to daily verbal and emotional embarrassment and abuse by fellow students, parents, lawyers, administration, pastors and church members and sheriff deputies due to the frauds told by Defendants about the actions and alleged actions of Plaintiff Townsend and by the intentional abusive actions reported herein by Pastors and Sheriff Deputies as Church Leadership practicing extortion and abuse on these children as extortion to get this Plaintiff Townsend as Father and Church Leader to drop his allegations of money fraud and building plan fraud and other tort acts of abusive and outrageous conduct by these in leadership
- D. Of harming these children by giving to these children medical prescription drugs gained by fraud of maternal grandmother Norma Harrod to her medical doctors and then mailed and then administered by Harrod, the mother to these children.
- E. Of harming these children by administering to these children at times larger than normal doses of Over the Counter Medicines to these minor children.
- F. Of harming these children removing them from the medical supervision of the honorable Dr. Santiago Hoyos, to the abusive and below standard care of Dr. Lon Lynn, in order to conspire and abuse these children from knowing these

extortion acts done by the membership of FBCCP and CPCS and these others as co-conspirators on these minor children

G. Of harming these children by omitting truthful disclosure and concealing the mental, physical and emotional abusive conduct done by Harrod and members of FBCCP and CPCS and pastors, counselors, teachers and Dr. Lon Lynn, as reported herein by this Plaintiff Townsend as concerned and loving father herein to Pastors, Doctors, Attorneys, Judges and Curtis Baughman of Victims Assistance.

H. Of abusive anger and rage by this Mother Karen Harrod and Donald Harrod as witnessed by Attorneys Heather Gray and Stanford Solomon outside the court of Judge Gomez on March 29, 2004, and refusing to allow this father to contact and intervene in the care of these minor children.

302. Plaintiff alleges this Court should immediately intervene and demand this Plaintiff as “NEXT FRIEND” be advised of all medical doctors names and addresses and phone numbers of the J.D.T and J.G.T so this father can properly inform these medical professionals of all conditions precedent regarding J.D.T. and J.G.T as conditions past prove these Defendants have and are intentionally abusing these “NEXT FRIENDS” to suppress the acts done to these children as reported herein.

303. Plaintiff Townsend herein as “NEXT FRIEND” alleges that these current medical physical, mental and emotional conditions of J.D.T. and J.G.T are from acts from all Defendants herein and can be confirmed by competent medical professionals after testimony by this Plaintiff Father who defendants have sought to suppress from the medical treatment of these children now since 1999, when these children

were removed from the medical care of Dr. Santiago Hoyos, **who knew and still respects the position of this concerned and loving, Plaintiff Father.**

304. Plaintiff alleges this Court should Order that a deposition and or consultation of J.D.T and J.G.T be done by Plaintiff Townsend, the father and as “NEXT FRIEND” or with Plaintiff Townsend allowed to be present to determine the care and safety of J.D.T and J.G.T.

305. Plaintiff alleges this Court should order payment and restitution per all available Florida Statues, for these “NEXT FRIEND” Children from these defendants for all necessary future medical expenses and medical care needed for mental and emotional counseling and award any and all special damages award for the treatment of these medical issues caused by these Defendants to these children.

COUNT XXII
(COMMON LAW FRAUD)- AGAINST ALL DEFENDANTS TO JUDGE RAUL PALOMINO AND JUDGE WAYNE TIMMERMAN AND JUDGE JAMES ARNOLD AND JUDGE MARVA CRENSHAW AND JUDGE GREG HOLDER AND JUDGE JAMES BARTON AND JUDGE RALPH STODDARD AND JUDGE MONICA SIERRA AND JUDGE FRANK GOMEZ AND TO THE SECOND DISTRICT COURT OF APPEALS and CONCEALMENT OF FRAUD ON THE COURTS

306. Plaintiff’s reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference. Plaintiff’s reallege all conditions precedent have been performed or have occurred.

307. At all times mentioned in this Complaint, Karen Harrod, was the wife or former wife of Plaintiff Townsend and mother of Plaintiff’s J.D.T and J.G.T and at all times mentioned in this Complaint, was acting with and for her co conspirators in the actions and in making the representations alleged in this Complaint and with their

knowledge and consent including attorneys and judges and agents as stated herein.

308. On or about 2003, through current times herein the State of Florida and Hillsborough County, Plaintiff Randall Townsend both verbally and in writing within his knowledge of facts at that time did attempt to truthfully advise Defendants truthful facts and allegations with out admission of truthful disclosure all matters as reported herein to provide per the duty of a father, husband and truthful citizen as stated the facts and allegations herein.

309. On or about 2003, through current times with proof as shown herein by the use of the injunctions gained by Harrod and BECK by frauds still humiliates and abuses and misrepresents the need and frauds used by the injunction from the order of Judge Timmerman herein the State of Florida and Hillsborough and Santa Rosa Counties, to abuse and harass and humiliate Plaintiffs and Defendants falsely and knowingly and fraudulently stated to Plaintiff's and others as stated herein that matters and issues as stated herein was as per Defendants allegations as truthful and not omissions of truthful disclosures as to the character, integrity, mental status, factual status and of a caring and loving husband, father and peaceful citizen but defendants did fraud to conceal and promote the alleged status of "Harrod as victims" being afraid of alleged misconduct and abuse by Plaintiff Townsend as stated herein, as and for repeated attempts to defame reputation of Plaintiff in the public eye.

310. On or about 1996, through current times herein the State of Florida, Harrod and Beck presented Plaintiff in disgrace and unfavorable and untruthful positions and light in the public eye and to persons as stated herein this Complaint in all points herein and Specifically to each action stated herein. The reports of statements by Harrod are

recorded herein in affidavits, transcripts, letters, Motions, and INJUNCTIONS, as noted for these records herein and additional statements will and can be provided upon the approval by this court in trial to allow discovery as has been prevented by Defendants and attorneys and judges as stated herein by the Orders, Injunctions and Extrinsic fraud as reported herein or CASES 05-911, 05-9605, and 02-03812.

311. The true facts is that this Plaintiff as reported herein has been truthful, loving, caring, honest and has not done one act of alleged violent or physically abusive conduct towards any person but Defendants allegations have been pure fraud in an attempt to harm and abuse and conceal malfeasance of her and her co defendants and co conspirators as Harrod as employee and mother, in December 2005, in MOTIONS to the court attempts to recant Harrods allegations began in 1996, and continues with the help and assistance and knowledge of herself, co conspirators and Defendants as stated herein and these other cases as Plaintiff Townsend requests the Court take Judicial notice of all cases.

312..Defendants, and each of them, knew when they made the representations concerning the integrity, character, conduct and public image and public actions of this Plaintiff Townsend that the representations were false; and defendants, and each of them, made the representations with the intent to induce Plaintiff and others as stated herein to rely on these representations and do conduct as stated herein to conceal defendant and her co conspirators actions and procure the Injunction by Judge Timmerman still to harm these Plaintiffs herein and continue the frauds of defendants and her co conspirators and or to the court of Judge Arnold and Judge Barton promote known fraud with regards to the Building and Growth Plan on moving the FBCCP

Corporation entirely to the new property at 18105 North Gunn Highway as specifically said by Plaintiff Townsend in 1997, would not happen but Clergy and alleged trustees and the estranged wife did fraud, omissions of truthful disclosure and conspired to fraud to promote these frauds and conceal all other violation of laws as reported herein knowingly with the help of “all hired guns” by these attorneys and judges.

313. Defendants and each of them, knew when they presented the false testimony and accusations and allegations against this Plaintiff as stated herein and in each exhibit that these allegations by Defendants and her co conspirators was fraud and presented to induce abuse and humiliation against Plaintiff Townsend with the intent to induce others as stated in actions specifically and other points incorporated fully herein to act to humiliate and abuse this Plaintiff and to thus conceal the actions of defendants and the co conspirators as stated specifically and incorporated fully herein.

314. Harrod with others did frauds and misrepresentation in the testimony as stated above and incorporated herein intentionally to induce Judge Timmerman to anger and to inflict the wrath of Judge Timmerman on Plaintiff and to induce the full actions alleged above herein to get the injunction and the order of financial gain in alimony and control of the marital home and to induce Judge Timmerman to see alleged Harrod and the marital children as “victims” at the alleged evil hand of this Plaintiff and or that Attorney Scruggs was caused to not be prepared by the hand of alleged acts of this Plaintiff now proved as fraud of Scruggs.

315. Plaintiffs, in fact, did believe the representations concerning the defendants claims and did in fact seek professional counseling and advice from Doctors, pastors,

professional authors, lawyers, judges and multiple advisors in attempts to refute and understand the allegations by Defendants as proof of truthful facts and to correct the light of the public eyes as to the truthful facts as alleged herein. Plaintiffs have not been able to get relief or yet know the full amount of defamation and destruction of the public image of Plaintiffs and financial damages and losses from the frauds and misrepresentations and omissions of truthful disclosure by Defendants to each person as stated in paragraphs and other points herein had Plaintiffs and others not relied on the truthfulness of the alleged allegations by Defendants and each of them.

316. As a proximate result of the false and fraudulent misrepresentations and actions of the defendants, Plaintiffs have incurred expenses, humiliations and abuse to their persons and reputations in the public eye and this would not have been required had the representations of and reports of and presented information of defendants been true and accurate.

317. As a further proximate result of the false and fraudulent misrepresentations and actions as reported herein of the defendants, plaintiffs incurred valuable lost time and relationships to each other as father and children to parent father and expenses for the litigation and satisfaction of the injunctions and orders gained by the frauds of defendants not being truthful causing harm to these plaintiffs

318. In making the representations and performing the acts alleged, defendants and each of them, acted intentionally with fraud and malice; and plaintiffs are entitled to damages in the sum yet fully unknown to the full extent the laws of Florida allow to the maximum of these Florida Statues violated by Defendants but estimated at \$2,000,000.00 or more.

319. Further Plaintiffs state s. 817.03, Florida Statutes;

“Making false statement to obtain property or credit.—Any person who shall make or cause to be made any false statement, in writing, relating to his financial condition, assets or liabilities, . . .,with fraudulent intent of obtaining credit, goods, money or other property, and shall by false statement obtain credit, goods, money or other property shall be guilty of a misdemeanor of the first degree, punishable as provided in s. 775.082 or s.775.083.”

Wherefore, Plaintiff prays for relief from any and all injunctions and financial restitution from the unjust enrichment of all defendants as stated herein each of these paragraphs and punitive damages.

COUNT XXIII
CLAIM FOR MEDICAL EXPENSES AGAINST ALL DEFENDANTS

320.Plaintiff’s reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

321.Plaintiff’s reallege all conditions precedent have been performed or have occurred.

322.As a further proximate result of the defendant’s negligent conduct, plaintiff has incurred expenses for medical care and attention, including physician’s fees in the amount yet fully unknown; medical supplies and medications in the amount yet fully unknown; and transportation to and from the physicians offices in the amount yet fully unknown. These expenses are incurred for the necessary care and treatment of plaintiff’s injuries resulting from the negligent action of defendant as described herein. Plaintiff’s medical expenses are reasonable and represent the customary charges for such services and supplies in Hillsborough County, Florida.

COUNT XXIV
CLAIM FOR DIMINISHED EARNING CAPACITY AGAINST ALL DEFENDANTS

323.Plaintiff’s reallege all paragraphs all preliminary allegations and subsequent

allegations as stated herein and incorporate these allegations herein by reference.

324. Plaintiff's reallege all conditions precedent have been performed or have occurred.

325. As a further proximate result of defendant's negligent conduct, plaintiff Townsend's capacity to earn a livelihood was severely impaired, and in all reasonable probability will continue to be impaired for an indefinite period, if not for the rest of Plaintiff Townsend's life. Plaintiff Townsend seeks damages for losses due to the impairment to his earning capacity in the amount in excess of \$1,000,000.00 to be determined by the jury.

COUNT XXV

CLAIM FOR PAIN AND SUFFERING TO INJURED PARTIES AGAINST ALL DEFENDANTS

326. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent

allegations as stated herein and incorporate these allegations herein by reference.

327. Plaintiff's reallege all conditions precedent have been performed or have occurred.

328. As a further proximate result of defendant's negligent conduct, each plaintiff has suffered great physical, mental, and emotional pain and suffering and humiliation and in all reasonable probability will continue to suffer severe mental and emotional pain and suffering and humiliation for the rest of their lives.

COUNT XXVI

CLAIM FOR FUTURE MEDICAL CARE AGAINST ALL DEFENDANTS

329. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent

allegations as stated herein and incorporate these allegations herein by reference.

330. Plaintiff's reallege all conditions precedent have been performed or have occurred.

331. As further proximate result of defendant's negligent conduct, a reasonable probability exist that each Plaintiff will incur future medical expenses. The full

amount of plaintiff's future medical expenses is not known to plaintiff at this time, and plaintiff will move to amend this complaint to state the amount at the time the amount is known.

COUNT XXVII
CLAIM FOR DAMAGES FOR FRAUD CAUSING REDUCTION OF
MARKET VALUE AND LOST PROFITS OF PERSONAL PROPERTY
AGAINST ALL DEFENDANTS

332. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

333. Plaintiff's reallege all conditions precedent have been performed or have occurred.

334. As a proximate result of the defendant's negligent conduct by fraud to Judge Gomez and the Appeals Court that Harrod had: (1) to leave her teaching job at CPCS at the hand of the alleged acts of Plaintiff Townsend without cause and move out of town and could not teach again so to incur alimony and education and rehabilitation expenses of \$500.00 a month for four years and (2) any ownership remaining in the marital home and the fraud that she had stated no money rights to the affidavit presented to the court of Judge Palomino but in trial before Judge Timmerman alleged a 25% ownership knowing she had been voted out of any ownership rights (3) no marital debt as setoffs to any possible assets in the marital home (4) required the home to incur lack of upkeep due to the excessive garnishments calculated to destroy the financial ability of this Plaintiff to pay all bills for the home and all other expenses in addition to the excessive garnishment (5) required the home to be sold per the AMENDED JUDGEMENT that had not been litigated as per the transcript of January 30, 2003, nor ordered after proper notification to this Pro Se Plaintiff Townsend and had not been argued but in first hearing in January 30, 2003, in which home issue was to remain under the control of Plaintiff but for the fraud

of Defendants and these attorneys but was done secretly by Harrod with Defendant and attorneys Scruggs and Turmel in conspiracy with Defendant, that this caused the home to lose value due to needed care and the requirement of the court to sell the home this did cause damage and loss to the Plaintiff in the amount of \$100,000.00 from the demise and sell of the home at below market value do to the forced sale by Harrod and Defendants.

COUNT XXVIII
CLAIM FOR ATTORNEYS FEES AGAINST ALL DEFENDANTS

335. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

336. Plaintiff's reallege all conditions precedent have been performed or have occurred.

337. Plaintiff Pleads for Entitlement For any and all attorney's fee's as Plaintiff Randall Townsend, had retained the Attorneys Firms of CHARLES H. SCRUGGS, P.A and HEATHER M. GRAY to represent these Plaintiffs in these actions and agreed to pay Attorney's Charles H. Scruggs, P.A. and Heather M. Gray a reasonable attorney fee And plaintiff retained other attorneys and paid attorneys reasonable fees yet Undetermined Plaintiff Randall Townsend is entitled to attorneys' fees pursuant to Florida Statue, 451 and Florida Statues 768 and others, as prevailing party, all reasonable attorneys' fees incurred in bringing this suit to prosecute Plaintiff's rights under the law. Plaintiff is entitled to recover attorneys' fees because of the frauds and omissions of truthful disclosure enumerated herein to attempt to restore the integrity and family rights of these Plaintiffs as breached by these defendants as alleged herein and Plaintiff has been compelled to employ counsel to enforce Plaintiff's rights under the law as alleged herein and plaintiff has paid court fees and

court reporter fees and additional fees and costs yet undertermined.

338. Plaintiffs allege and affirm that the documents attached herein as Exhibits and others as papers, affidavits, pleadings, transcripts and Judgements and Orders was issued or the act done in compliance with the law and request this court to take judicial notice of all cases mentioned herein.

COUNT XXIX
COMPLAINT FOR VICARIOUS LIABILITY OF
PROFESSIONAL CORPORATION FOR MALPRACTICE OF MEMBER
ATTORNEY and VIOLATIONS OF RESPONDENT SUPERIOR---AGAINST
DEFENDANTS HEATHER GRAY ATTORNEY AND HEATHER GRAY
ATTORNEY AT LAW, P.A. AS OF HEATHER GRAY INDIVIDUAL

339. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

340. Plaintiff state that the acts as stated herein of Attorney Heather Gray and Heather Gray, Individual were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that HEATHER GRAY ATTORNEY AT LAW, P.A. knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

341. Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statues as stated in Section 5 above herein and was damaged and is continued to be damaged and separated as a father and child now since NOVEMBER 8, 2002, by the frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES since Defendants became advocates for clients in February 2003, with knowledge and

duty to disclose attorney Scruggs and Scruggs P.A for their violations of these clients and frauds on the courts.

342.Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

343.WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED BELOW HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

COUNT XXX
COMPLAINT FOR MALPRACTICE OF MEMBER ATTORNEY AS VIOLATIONS BY THEORY OF RESPONDENT SUPERIOR---AGAINST DEFENDANTS HEATHER GRAY ATTORNEY AND HEATHER GRAY ATTORNEY AT LAW, P.A. AS OF HEATHER GRAY INDIVIDUAL

344. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

345.Plaintiff state that the acts as stated herein of Attorney Heather Gray and Heather Gray, Individual were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that HEATHER GRAY ATTORNEY AT LAW, P.A. knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

346.Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statues as stated in Section 5 above herein and was damaged and is continued to be damaged and separated as a father and child now since NOVEMBER 8, 2002, by the

frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES since Defendants became advocates for clients in February 2003, with knowledge and duty to disclose attorney Scruggs and Scruggs P.A for their violations of these clients and frauds on the courts.

347. Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

348. WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

WHEREFORE, plaintiff prays for judgment and relief against defendants and each of them as follows:

- A. A Declaration that each Defendants conduct violated the law as alleged in each cause of action;
- B. A Declaration to abolish the “injunction” section from the Court of Judge Timmerman, limiting the rights of this Plaintiff Townsend as father to his now adult children, J.D.T and J.G.T and restoration of all full rights and expunge all records of these injunctions caused by fraud of the defendants to the court as revealed by Karen Harrod Townend in December 2005, Motion to this Honorable Court no threat of abuse molesting or any vile act exists or ever existed;
- C. preliminary and permanent injunctions preventing defendants and her co-conspirators from any future acts of abuse and slander and harassment to Plaintiffs per s. 741 F.S. and all other Florida Statutes and set severe penalties to warn Defendants and her co-conspirators of future abuse to the peace of these Plaintiffs;
- D. Judgement for the Plaintiff for general and compensatory damages sustained as a result of defendants’ unlawful conduct;
- E. For the following special damages to be awarded according to complete discovery of all proof to the limits allowed by law:
 1. For physical Pain and suffering incurred while Defendants used fraud and
 2. For the Loss of parental rights by Plaintiff Randall Townsend to J.D.T and to J.G.T and
 3. For Emotional Duress and Mental Duress incurred for Defendants use of abuse and fraud
 4. For Loss of honorable reputation of Plaintiff having to endure the slander and defamation and frauds and malice and abuse of process and malicious prosecution and all actions per each count shown herein without counter defense by Defendants to off set the malicious charges incurring all special and general damages as stated herein and

5. For all general, compensatory and nominal damages resulting from each Defendants conspiracy and fraud and duress and extortion with Beck and Harrods employer, FBCCP and CPCS and by the extortion and abuse and conspiracy with individuals and co-employees at the place of employment as listed below as these litigants falsely charging this Plaintiff with crimes in order to hide their criminal acts on Plaintiff Randall Townsend and on Minor J.D.T and Minor J.G.T and Defendants conspiracy with:
 - A. Ron Beck, individually, and as FBCCP Corporation Member and Officer
 - B. Herman Meister, individually, and as FBCCP Corporation Member and Officer
 - C. Gary Leatherman, individually, and as Corporation Member and Officer
 - D. Joe Howlett, individually, and as Corporation Member and HCSO Deputy
 - E. Tim Jeffers, individually, and as Corporation Member and as PCSO Deputy
 - F. The FBCCP Corporation
 - G. The Citrus Park Christian School, employees and School Board
 - H. And from the FBCCP Corporation members at Large
 - I. From the abusive conduct practiced on these Pro Se Plaintiffs by Defendants attorneys causing duress and fraud on these Plaintiffs by the frauds of Defendants to attorneys, David Gibbs, III; Drew Gardner; Charles Denny, IV; Stacey Turmel; Charles H. Scruggs, III; Heather Gray and Stanford Solomon;
 - J. For Special Damages in loss of reputation and loss of employment by Plaintiff Randall Townsend in October 2005, flowing from the fraudulent actions by Defendants
 - K. For Special Damages in loss of reputation and loss of monies owed this Plaintiff Townsend, from SunBelt Equipment Corporation, as damages of Defendants barred litigation as advised by the State Attorney for defamation and slander and lost earnings were at \$1,000,000.00
6. For damages resulting from Defendants violation of the injunction set by Judge Timmerman and the admitted contact by Harrod with Plaintiff's employer up until October, 2005, and these injunctions in 2001 and 2003-current, and allegations and contacts by these defendants did attribute to Harrods and others and thereby defendants willful negligence and abuse, infliction of emotional duress and harassment in the workplace and loss of employment and loss of earnings and all future earnings because of the frauds and acts of Defendants and the contacts to abuse this Plaintiff to this employer.
7. For Loss of Earning capacity from the damaged reputation and integrity caused by the attacks and injunctions of Defendants to defame Plaintiff Townsend in the public eye
8. For lost profits of the home equity valued at \$100,000.00.

9. For any and all future medical fees and costs and expenses for future medical attention for emotional, physical and mental restoration for these Plaintiffs well being of a future relationship as parent to children and children to this Plaintiff.
10. For the cost incurred with this action
11. For legal costs and fees in all court cases
12. For any and all attorney's fee's as Plaintiff Randall Townsend, had retained the Attorneys Firms of CHARLES H. SCRUGGS, P.A and HEATHER M. GRAY to represent these Plaintiffs in these actions and agreed to pay Attorney's Charles H. Scruggs, P.A. and Heather M. Gray a reasonable attorney fee which should be returned with interest.
13. For such and further relief as this court may deem proper
14. For any and all other Compensatory Damages
15. For CONSEQUENTIAL DAMAGES
16. Plaintiff request leave to amend pleading to request Punitive damages at time that is just and proper per these pleadings.
17. FOR EXEMPLARY DAMAGES
18. FOR ALL NOMINAL DAMAGES
19. FOR TREBLE DAMAGES
20. AND For any and all additional sanctions, awards and retributions, this court seems just to allow.
21. FOR A JURY TRIAL ON ALL ISSUES TRIABLE OF RIGHT BY JURY.

COUNT XXXI

FRAUD AGAINST THE FLORIDA BAR AND THE JUDICIAL QUALIFICATIONS COMMISSION AND THE SECOND DISTRICT COURT OF APPEALS AND CHIEF JUDGE MANUEL MENENDEZ JR. OF HILLSBOROUGH COUNTY FLORIDA CIRCUIT CIVIL COURTS, HILLSBOROUGH COUNTY, FLORIDA AND THE STATE OF FLORIDA

349. Plaintiffs re-allege all points above and below and incorporates them herein
350. Plaintiff allege that each Defendant herein alleges to hold, protect, enforce and prosecute violation and violators of the United States Constitution, State of Florida Constitution and U.S. Codes and State and Local Statues and Ordinances for the civil and peaceful protections and guarantees of all rights as citizens within their jurisdictions.
351. Plaintiff's allege that each defendant herein knowingly, intentionally, willfully and recklessly refused to do their dutiful service as stated upon acceptance to the position or job they allege to perform and hold for protection of these Plaintiffs they allege to serve.
352. Plaintiffs allege that by these Defendants intentional, willful and knowingly

reckless performance of duty that Plaintiffs have been damaged as a result of their willful and intentional negligence and tort conspiracy not to perform the services they allege to do and thereby not performing do perform a fraud that they are performing to protect all Constitutional rights as stated herein.

353. Wherefore Plaintiffs demand judgement for all compensation and damages so allowed under the law against each defendant and prosecution against each defendant as this Federal court may so rule.

COUNT XXXII
CLAIM OF CONSPIRACY AGAINST THE FLORIDA BAR AND THE
JUDICIAL QUALIFICATIONS COMMISSION AND THE SECOND DISTRICT
COURT OF APPEALS AND CHIEF JUDGE MANUEL MENENDEZ JR. OF
HILLSBOROUGH COUNTY FLORIDA CIRCUIT CIVIL COURTS, FAMILY
COURTS, DOMESTIC VIOLENCE COURTS OF HILLSBOROUGH COUNTY,
FLORIDA AND THE STATE OF FLORIDA

Plaintiffs re-allege all points above and below and incorporates them herein

354. Plaintiff allege that each Defendant herein alleges to hold, protect, enforce and prosecute violation and violators of the United States Constitution, State of Florida Constitution and U.S. Codes and State and Local Statues and Ordinances for the civil and peaceful protections and guarantees of all rights as citizens within their jurisdictions.

355. Plaintiff's allege that each defendant herein knowingly, intentionally, willfully and recklessly since first advised starting in 1999, and through filing of this complaint have refused to do their dutiful service as stated upon acceptance to the position or job that they allege to perform and hold for the protection of these Plaintiffs they allege to serve.

356. Plaintiffs allege that by these Defendants intentional, willful and knowingly reckless performance of duty that Plaintiffs have been damaged as a result of their willful and intentional negligence and tort conspiracy not to perform the services they allege to

do and thereby not performing do perform a fraud that they are performing to protect all Constitutional rights as stated herein but instead choose and conspire to give unlawful “Benefit to Clergy” and attorneys and judges and others in alleged law enforcement.

357. Wherefore Plaintiffs demand judgement for all compensation and damages so allowed under the law against each defendant and prosecution against each defendant as this Federal court may so rule as each defendant did Conspiracy to hold responsibility but did refuse to act to perform and protect. Plaintiff Townsend also seeks punitive damages.

COUNT XXXIII
VICARIOUS LIABILITY AGAINST THE FLORIDA BAR AND
THE JUDICIAL QUALIFICATIONS COMMISSION AND THE SECOND
DISTRICT COURT OF APPEALS AND CHIEF JUDGE MANUEL MENENDEZ
JR. OF HILLSBOROUGH COUNTY FLORIDA CIRCUIT CIVIL COURTS,
HILLSBOROUGH COUNTY, FLORIDA AND THE STATE OF FLORIDA, THE
OFFICE OF THE ATTORNEY GENERAL AND THE OFFICE OF THE
FLORIDA DEPARTMENT OF LAW ENFORCMENT AND THE
HILLSBOROUGH COUNTY SHERIFF DEPARTMENT AND HILLSBOROUGH
COUNTY OF THE STATE OF FLORIDA AND THE PINELLAS SHERIFF
DEPARTMENT AND THE PASCO SHERIFF DEPARTMENT AND THE CITY
OF TAMPA

Plaintiffs re-allege all points above and below and incorporates them herein

358. Plaintiff allege that each Defendant herein alleges to hold, protect, enforce and prosecute violation and violators of the United States Constitution, State of Florida Constitution and U.S. Codes and State and Local Statues and Ordinances for the civil and peaceful protections and guarantees of all rights as citizens within their jurisdictions.

359. Plaintiff’s allege that each defendant herein knowingly, intentionally, willfully and recklessly since first advised starting in 1999, of the violations of laws by the actions of alleged Clergy and alleged Trustees as Sheriff Deputies and officers have willfully and knowingly and intentionally chose and assisted “Benefit of Clergy” in the advance of

frauds and omissions of truthful disclosure and through filing of this complaint have refused to do their dutiful service as stated upon acceptance to the position or job that they allege to perform and hold for the protection of these Plaintiffs they allege to serve in violation of **NORFOLK MONUMENT CO. v. MEMORIAL GARDENS** 394 U.S. 700, 89 S.Ct 1391, 22 L. Ed. 2d 658, 662 (1969) stating:

“No formal agreement between the parties is necessary to constitute an unlawful conspiracy. Nor is it essential that a coconspirator participate in any particular phase of the conspiracy such as it’s planning, inception, or conclusion; a conspiracy may be found if the co conspirator was aware of the scheme and assisted it in some phase of its perpetration.” Per **DONOFRIO v. MATASSINI** 503 So2d 1278, 1281(Fla. 2d DCA 1987).

360. Plaintiffs allege that by these Defendants intentional, willful and knowingly reckless performance of duty that Plaintiffs have been damaged as a result of their willful and intentional negligence and tort conspiracy not to perform the services they allege to do and thereby not performing do perform a fraud that they are performing to protect all Constitutional rights and violations of Florida Statues §542.18, 542.19, 772.103(4) and 772.104 and others as 42. U.S.C. § 1985, as stated herein.

361. Wherefore Plaintiffs demand judgement for all compensation and damages and a claim of punitive damages so allowed under the law against each defendant and prosecution against each defendant as this Federal court may so rule as each defendant did Conspiracy to hold responsibility but did refuse to act to perform and protect.

COUNT XXXIV
CLAIM FOR BAD FAITH AGAINST
UTICA INSURANCE COMPANY OF NEW YORK

Plaintiffs re-allege all points above and below and incorporates them herein

362. Plaintiff allege that each Defendant herein alleges to hold, protect, enforce and Protect for violation and violators of the United States Constitution, State of Florida

Constitution and U.S. Codes and State and Local Statues and Ordinances for the civil and peaceful protections and guarantees of all rights as citizens within their jurisdictions of the policies they contract to and with their clients.

363. Plaintiff's allege that defendant herein knowingly, intentionally, willfully and recklessly refused to do their dutiful service as stated upon acceptance to the position or job that they allege to perform and hold for the protection of these Plaintiffs they allege to serve upon entering into the Contract for services with the First Baptist Church of Citrus Park and for payments of legal services to the law firm of DICKINSON & GIBBONS and that by allowing the FIRM OF DICKINSON & GIBBONS and its lawyers as agents to represent in conflict of interest and violations of attorney client rules this Insurance agency has violated its duty to these Plaintiffs and advanced the frauds of Ron Beck, Herman Meister, Gary Leatherman, Joe Howlett, Tim Jeffers, Dr. Lon Lynn, Karen Harrod Townsend and Charles Denny as individuals in violations of rights of these Plaintiffs who sought protections for themselves and the Corporation who they freely and religiously attempt to serve and protect but for the frauds, omissions of truthful disclosure and conspiracy and bad faith actions of Ron Beck, Herman Meister, Gary Leatherman, Joe Howlett, Tim Jeffers, Dr. Lon Lynn, Karen Harrod Townsend and Charles Denny being allowed to act and fail to act while serving the interests of Defendants and as UTICA INSURANCE COMPANY OF NEW YORK.

364. Plaintiffs allege that by these Defendants intentional, willful and knowingly reckless performance of duty that Plaintiffs have been damaged as a result of their willful and intentional negligence and tort conspiracy not to perform the services they allege to do and thereby not performing do perform a fraud that they are performing to protect all

Constitutional rights as stated herein and also by not attempting to settle the claim of this Plaintiff but have promoted frauds and incompetent offers of judgments based on the intensity and damages known and stated in this Complaint.

365. Wherefore Plaintiffs demand judgement for all compensation and damages so allowed under the law against each defendant and prosecution against each defendant as this Federal court may so rule as each defendant did Conspiracy to hold responsibility but did refuse to act to perform and protect. Plaintiffs also seek punitive damages.

COUNT XXXV
CLAIM FOR MISSAPPROPRIATION OF CORPORATE OPPORTUNITY
AGAINST DEFENDANTS RON BECK, individually, Ron Beck as Pastor, Herman Meister, Individually, Herman Meister as Pastor of School Ministries, April Beck, Individually, April Beck as Employee of FBCCP/CPCS, Joyce Meister, Individually, Joyce Meister as Employee of FBCCP/CPCS, Gary Leatherman, Individually, Gary Leatherman an Officer of the FBCCP Corporation, Tim Jeffers, Individually, Tim Jeffers as an Officer of the FBCCP Corporation, Karen Jeffers, Individually, Karen Jeffers as an Employee of FBCCP/CPCS and other Defendants as “DOE” until full production of Corporation Records.

Plaintiffs re-allege all points above and below and incorporates them herein

366. Per **Uvanile v. Denoff** 495 So2d 1177 (Fla. 4th, DCA 1986) and **Head v. Lane** 495 So2d 821 (Fla. 4th DCA, 1986) and **Tinwood N.V. v. Sun Banks** 570 So2d 955 (Fla. 5th DCA 1990, stating “An officer or director is precluded from making any secret profit or deriving any personal advantage at the expense of the corporation.”

367. On or about 1995 – present Defendants named herein did deprive, conceal, omit truthful disclosure from the General Voting Members and this Plaintiff the misappropriation of Corporate opportunities and assets as full disclosure is required by the Florida Statues and by the FBCCP Corporation BY-LAWS as stated above and below in each paragraph herein this full complaint and did receive unjust enrichment thereby.

368. Plaintiffs demands full and complete restitution, punitive, compensatory damages and what ever relief this court deems proper because of the actions of defendants named herein acting individually, and jointly.

COUNT XXXVI

ABUSE OF PROCESS AGAINST DEFENDANTS DEPUTY JOE HOWLETT, DEPUTY TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN, DEPUTY MIKE SMOAK, TAMPA POLICE OFFICER JOE KAREAS AND OFFICER MIKE SHAR FOR ACTS AGAINST PLAINTIFFS AS ALL MINOR CHILDREN AS MEMBERS OF FBCCP AND CPCS

369. Comes Now Plaintiff, Randall Townsend individual, and sues Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar as individuals and as Law Enforcement, Sheriff Deputies and Police officers and for all Minor Plaintiffs and reallege all paragraphs above and below and incorporates herein and alleges:

370. Plaintiff, Randall Townsend, is an individual residing at relevant times in Hillsborough, Sarasota and Pinellas County's of Florida within the jurisdiction of the UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and with rights as a citizen and FBCCP member now not able to be fully known until the production of FBCCP Business Records in June/July 2006, to have Constitutional and BY-LAWS rights to Speech, Assembly, No Child interference with his fathers rights, and Religious freedoms and for life, liberty and pursuit of happiness but to conceal the frauds of pastors and sheriff deputies as masked trustees these defendants did use their Law Enforcement uniforms as masks that all activities of themselves and these clergy and attorneys and judges were lawful and now proved fraud, and collusion as stated herein.

371. Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe

Kareas and Mike Shar are individuals residing within the Counties of Hillsborough and Pasco of, Florida and working or were working at their times of actions or were “on duty” or “off duty” and or now retired as “law enforcement” within the Counties of Hillsborough, Pasco and Pinellas of Florida and within the jurisdiction of the State of Florida and of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA.

372. Plaintiff Townsend restates all paragraphs of Number 4-20 as above herein that show that action is proper within the venue and Jurisdiction of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and Because each Defendant is a resident or was doing or was alleging to do official duties, “on duty” and “off duty” as “law enforcement” or as officers of the courts and this court is a proper venue for this action as stated above herein.

373. This is an action for damages in excess of \$ 25,000.00 and is within the jurisdiction of this court.

374. On or about September 8, 1999, and still through current times and at all other times as stated above and herein at the First Baptist Church of Citrus Park at 7705 Gunn Highway, Tampa Florida, and at 18105 Gunn Highway, Tampa Florida and at the Court Room of Judge Raul Palomino of Hillsborough County on November 15, 2001, by individual and as Deputy Joe Howlett(Howlett) and by Howlett at Citrus Park Town Center Mall on numerous occasions and by Mike Shar at Kmart in Sarasota, Florida and by each Defendant in Count XIII, herein and on surrounding roads at or about Gunn Highway at or around the Citrus Park Baptist Church Defendant assaulted Plaintiff in that Defendants Howlett and Smoak did use their Deputy Crusiers at times with lights

flashing to impede the peaceful operation of Plaintiff Townsend in or out side of his vehicle to deter, inflict shame and harassment and abuse and Deputy Howlett even on occasions would attempt to coerce Plaintiff Townsend to retaliate with resistance so Deputy Howlett could arrest Plaintiff Townsend and per the verbal under oath testimony of Defendant Ron Beck on November 15, 2001, under oath to Judge Raul Palomino Beck did attempt to use the alleged needed actions of Howlett and Jeffers and Smoak to allege that Plaintiff Townsend without lawful duty or cause had to be restrained or blocked from alleged illegal or unlawful conduct at the steps of the Church despite Plaintiff Townsend being a member and fully and completely can prove that Plaintiff Townsend was invited by several members to address in open forum business meeting process per the BY-LAWS duty the issues of frauds and corruption of these Pastors and these same deputies as alleged Trustee's. Plaintiff states that each deputy and officer at all times herein and in all paragraphs above and below appeared to each plaintiff to be acting in their official "mask" or uniform as an officer of the law and that all deputies and officers acted to appear to be within their official roles in order to inflict conspired control, restraint and protection of Plaintiff Townsend to others. Plaintiff Townsend alleges that even Corbin did publicly yell and abuse Plaintiff Townsend to make a public scene for the alleged protection of others despite Corbin as a member of the LRPC Committee fully knowing the pure motives of Plaintiff Townsend. Defendants, while arguing at Plaintiff over Church issues and pastor and others criminal actions and frauds, would yell publicly, chase plaintiff Townsend on foot and in official vehicles and attempted to at times even in uniform cause or Ordered Plaintiff Townsend from his car so Deputies could show alleged protection and deceptions and frauds and omissions of truthful disclosure and

misappropriation of their vested Corporation and Citizens rights to others as these Minor Plaintiffs herein and possibly entice Plaintiff Townsend to resist the harassment and abuse so to cause additional emotional distress to the Minor Plaintiffs herein. Defendant Jeffers even did Touch the Wife of Plaintiff Townsend on the steps of the Church and led her away from talking to Plaintiff Townsend so to make appear that persons were in danger. Defendant Howlett at times stood in front of Plaintiff, who was in his car, blocking him in his seat. Defendant then threatened to arrest Plaintiff and raised his hand to his gun belt as if to need against Plaintiff, all the while standing over Plaintiff and leaving Plaintiff no avenue of escape.

375. Defendant intended to cause apprehension of imminent harm in Plaintiffs in that Defendant Beck had advised Plaintiff Townsend show that defendant's acts were intended as Defendant Beck stated "he would file charges if Plaintiff tried to speak in Church meetings or attend Church or School services and business meetings or school functions and as told to judge Palomino on November 15, 2001, by Defendant Ron Beck and Defendant Employee Karen Harrod Townsend. Defendant approached Plaintiff, who was seated many times in his car, with no intent to harm anyone would be approached and engaged by Defendants threatening to cause violent physical injury by arrest, and then use police type car chases, traffic stops with lights flashing, intervention at the Church Steps prohibiting Plaintiff now fully known to have always been a member of the Corporations with rights not restricted by the Courts but only on November 2-15, 2001, and by Deputy Howlett making false allegations to Curtis Baughman and attending the Court of Judge Palomino stating willingly to give false testimony and , thereby causing Plaintiff to feel threatened with imminent bodily injury and place him in apprehension for

his safety and fear of going to prison. Furthermore, Defendant's acts were substantially certain to result in apprehension of imminent harm in Plaintiff.

376. Because Defendant Howlett made intentional threats to Plaintiff, on April 27, 2000 to “get your hands on the table”, prohibited discovery of FBCCP Materials, prohibited Townsend from the April 30, 2000, Business Meeting and in traffic stops would require Plaintiff to flee the property while just sitting waiting for his children or be chased by Deputy Howlett, Deputy Smoaks and being yelled at and repeatedly chased by Defendant Ron Beck in his vehicle even at one time with a visiting evangelist willing to verbally communicate the threats and chase to pastors at Idlewild Baptist Church and was not restrained in his movements as Plaintiff was, Defendant had the apparent present ability to harm Plaintiff as he was threatening to do and as a direct and proximate result, Plaintiff reasonably feared that Defendant would imminently inflict bodily harm on or put Plaintiff in jail.

377. As a direct and proximate result of Defendant's conduct, Plaintiff was injured in that Plaintiffs were frightened and excited, resulting in a mental and nervous injury that has caused Plaintiff great emotional pain and suffering and loss of his family and loss of his relationship now freely per his civil rights with his children since October 20, 1999, and now having not been able to see his children now since November 8, 2002 and reputation and employment and loss of future ability to earn income and reduction in ability to earn income and defamation and slander.

378. As a further direct and proximate result of Defendant's conduct, Plaintiff has been damaged in the yet undetermined amount of financial damages for the cost of medical

bills, and for lost earnings and the ability to create employment and earnings.

WHEREFORE, Plaintiff demands judgment as follows:

- A. For general damages.
- B. For punitive damages.
- C. For intentional infliction of emotional distress
- D. For costs of suit incurred in this action.
- E. For other and further relief as the Court may deem proper.

COUNT XXXVII

**FOR BATTERY AGAINST DEFENDANTS DEPUTY JOE HOWLETT, DEPUTY
TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN, DEPUTY MIKE SMOAK,
TAMPA POLICE OFFICER JOE KAREAS AND OFFICER MIKE SHAR FOR
ACTS AGAINST PLAINTIFFS AS ALL MINOR CHILDREN AS MEMBERS OF
FBCCP AND CPCS**

379. Comes Now Plaintiff, Randall Townsend individual, and sues Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar as individuals and as Law Enforcement, Sheriff Deputies and Police officers and for all Minor Plaintiffs and reallege all paragraphs above and below and incorporates herein and alleges:

380. Plaintiff, Randall Townsend, is an individual residing at relevant times in Hillsborough, Sarasota and Pinellas County's of Florida within the jurisdiction of the UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and with rights as a citizen and FBCCP member now not able to be fully known until the production of FBCCP Business Records in June/July 2006, to have Constitutional and BY-LAWS rights to Speech, Assembly, No Child interference with his fathers rights, and Religious freedoms and for life, liberty and pursuit of happiness but to conceal the frauds of pastors and sheriff deputies as masked trustees these defendants did use their Law Enforcement uniforms as masks that all activities of themselves and these clergy and attorneys and judges were lawful and now proved fraud, and collusion as stated herein.

381. Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar are individuals residing within the Counties of Hillsborough and Pasco of, Florida and working or were working at their times of actions or were “on duty” or “off duty” and or now retired as “law enforcement” within the Counties of Hillsborough, Pasco and Pinellas of Florida and within the jurisdiction of the State of Florida and of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA.

382. Plaintiff Townsend restates all paragraphs of Number 4-20 as above herein that show that action is proper within the venue and Jurisdiction of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and Because each Defendant is a resident or was doing or was alleging to do official duties, “on duty” and “off duty” as “law enforcement” or as officers of the courts and this court is a proper venue for this action as stated above herein.

383. This is an action for damages in excess of \$ 25,000.00 and is within the jurisdiction of this court.

384. On or about September 8, 1999, and still through current times and at all other times as stated above and herein at the First Baptist Church of Citrus Park at 7705 Gunn Highway, Tampa Florida, and at 18105 Gunn Highway, Tampa Florida and at the Court Room of Judge Raul Palomino of Hillsborough County on November 15, 2001, by individual and as Deputy Joe Howlett(Howlett) and by Howlett at Citrus Park Town Center Mall on numerous occasions and by Mike Shar at Kmart in Sarasota, Florida and by each Defendant in Count XIII, herein and on surrounding roads at or about Gunn Highway at or around the Citrus Park Baptist Church Defendant assaulted Plaintiff in that

Defendants Howlett and Smoak did use their Deputy Crusiers at times with lights flashing to impede the peaceful operation of Plaintiff Townsend in or out side of his vehicle to deter, inflict shame and harassment and abuse and Deputy Howlett even on occasions would attempt to coerce Plaintiff Townsend to retaliate with resistance so Deputy Howlett could arrest Plaintiff Townsend and per the verbal under oath testimony of Defendant Ron Beck on November 15, 2001, under oath to Judge Raul Palomino Beck did attempt to use the alleged needed actions of Howlett and Jeffers and Smoak to allege that Plaintiff Townsend without lawful duty or cause had to be restrained or blocked from alleged illegal or unlawful conduct at the steps of the Church despite Plaintiff Townsend being a member and fully and completely can prove that Plaintiff Townsend was invited by several members to address in open forum business meeting process per the BY-LAWS duty the issues of frauds and corruption of these Pastors and these same deputies as alleged Trustee's. Plaintiff states that each deputy and officer at all times herein and in all paragraphs above and below appeared to each plaintiff to be acting in their official "mask" or uniform as an officer of the law and that all deputies and officers acted to appear to be within their official roles in order to inflict conspired control, restraint and protection of Plaintiff Townsend to others. Plaintiff Townsend alleges that even Corbin did publicly yell and abuse Plaintiff Townsend to make a public scene for the alleged protection of others despite Corbin as a member of the LRPC Committee fully knowing the pure motives of Plaintiff Townsend. Defendants, while arguing at Plaintiff over Church issues and pastor and others criminal actions and frauds, would yell publicly, chase plaintiff Townsend on foot and in official vehicles and attempted to at times even in uniform cause or Ordered Plaintiff Townsend from his car so Deputies could show

alleged protection and deceptions and frauds and omissions of truthful disclosure and misappropriation of their vested Corporation and Citizens rights to others as these Minor Plaintiffs herein and possibly entice Plaintiff Townsend to resist the harassment and abuse so to cause additional emotional distress to the Minor Plaintiffs herein. Defendant Jeffers even did Touch the Wife of Plaintiff Townsend on the steps of the Church and led her away from talking to Plaintiff Townsend so to make appear that persons were in danger. Defendant Howlett at times stood in front of Plaintiff, who was in his car, blocking him in his seat. Defendant then threatened to arrest Plaintiff and raised his hand to his gun belt as if to need against Plaintiff, all the while standing over Plaintiff and leaving Plaintiff no avenue of escape.

385. Defendant intended to cause apprehension of imminent harm in Plaintiffs in that Defendant Beck had advised Plaintiff Townsend show that defendant's acts were intended as Defendant Beck stated "he would file charges if Plaintiff tried to speak in Church meetings or attend Church or School services and business meetings or school functions and as told to judge Palomino on November 15, 2001, by Defendant Ron Beck and Defendant Employee Karen Harrod Townsend. Defendant approached Plaintiff, who was seated many times in his car, with no intent to harm anyone would be approached and engaged by Defendants threatening to cause violent physical injury by arrest, and then use police type car chases, traffic stops with lights flashing, intervention at the Church Steps prohibiting Plaintiff now fully known to have always been a member of the Corporations with rights not restricted by the Courts but only on November 2-15, 2001, and by Deputy Howlett making false allegations to Curtis Baughman and attending the Court of Judge Palomino stating willingly to give false testimony and , thereby causing

Plaintiff to feel threatened with imminent bodily injury and place him in apprehension for his safety and fear of going to prison. Furthermore, Defendant's acts were substantially certain to result in apprehension of imminent harm in Plaintiff.

386. Because Defendant Howlett made intentional threats to Plaintiff, on April 27, 2000 to “get your hands on the table”, prohibited discovery of FBCCP Materials, prohibited Townsend from the April 30, 2000, Business Meeting and in traffic stops would require Plaintiff to flee the property while just sitting waiting for his children or be chased by Deputy Howlett, Deputy Smoaks and being yelled at and repeatedly chased by Defendant Ron Beck in his vehicle even at one time with a visiting evangelist willing to verbally communicate the threats and chase to pastors at Idlewild Baptist Church and was not restrained in his movements as Plaintiff was, Defendant had the apparent present ability to harm Plaintiff as he was threatening to do and as a direct and proximate result, Plaintiff reasonably feared that Defendant would imminently inflict bodily harm on or put Plaintiff in jail.

387. As a direct and proximate result of Defendant's conduct, Plaintiff was injured in that Plaintiffs were frightened and excited, resulting in a mental and nervous injury that has caused Plaintiff great emotional pain and suffering and loss of his family and loss of his relationship now freely per his civil rights with his children since October 20, 1999, and now having not been able to see his children now since November 8, 2002 and reputation and employment and loss of future ability to earn income and reduction in ability to earn income and defamation and slander.

388. As a further direct and proximate result of Defendant's conduct, Plaintiff has been damaged in the yet undetermined amount of financial damages for the cost of medical

bills, and for lost earnings and the ability to create employment and earnings.

WHEREFORE, Plaintiff demands judgment as follows:

- A. For general damages.
- B. For punitive damages.
- C. For intentional infliction of emotional distress
- D. For costs of suit incurred in this action.
- E. For other and further relief as the Court may deem proper.

COUNT XXXVIII

FRAUD AGAINST DEFENDANTS DEPUTY JOE HOWLETT, DEPUTY TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN, DEPUTY MIKE SMOAK, TAMPA POLICE OFFICER JOE KAREAS AND OFFICER MIKE SHAR FOR ACTS AGAINST PLAINTIFFS AS ALL MINOR CHILDREN AS MEMBERS OF FBCCP AND CPCS

389. Comes Now Plaintiff, Randall Townsend individual, and sues Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar as individuals and as Law Enforcement, Sheriff Deputies and Police officers and for all Minor Plaintiffs and reallege all paragraphs above and below and incorporates herein and alleges:

390. Plaintiff, Randall Townsend, is an individual residing at relevant times in Hillsborough, Sarasota and Pinellas County's of Florida within the jurisdiction of the UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and with rights as a citizen and FBCCP member now not able to be fully known until the production of FBCCP Business Records in June/July 2006, to have Constitutional and BY-LAWS rights to Speech, Assembly, No Child interference with his fathers rights, and Religious freedoms and for life, liberty and pursuit of happiness but to conceal the frauds of pastors and sheriff deputies as masked trustees these defendants did use their Law Enforcement uniforms as masks that all activities of themselves and these clergy and attorneys and judges were lawful and now proved fraud, and collusion as stated herein.

391. Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar are individuals residing within the Counties of Hillsborough and Pasco of, Florida and working or were working at their times of actions or were “on duty” or “off duty” and or now retired as “law enforcement” within the Counties of Hillsborough, Pasco and Pinellas of Florida and within the jurisdiction of the State of Florida and of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA.

392. Plaintiff Townsend restates all paragraphs of Number 4-20 as above herein that show that action is proper within the venue and Jurisdiction of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and Because each Defendant is a resident or was doing or was alleging to do official duties, “on duty” and “off duty” as “law enforcement” or as officers of the courts and this court is a proper venue for this action as stated above herein.

393. This is an action for damages in excess of \$ 25,000.00 and is within the jurisdiction of this court.

394. On or about September 8, 1999, and still through current times and at all other times as stated above and herein at the First Baptist Church of Citrus Park at 7705 Gunn Highway, Tampa Florida, and at 18105 Gunn Highway, Tampa Florida and at the Court Room of Judge Raul Palomino of Hillsborough County on November 15, 2001, by individual and as Deputy Joe Howlett(Howlett) and by Howlett at Citrus Park Town Center Mall on numerous occasions and by Mike Shar at Kmart in Sarasota, Florida and by each Defendant in Count XIII, herein and on surrounding roads at or about Gunn Highway at or around the Citrus Park Baptist Church Defendant assaulted Plaintiff in that

Defendants Howlett and Smoak did use their Deputy Crusiers at times with lights flashing to impede the peaceful operation of Plaintiff Townsend in or out side of his vehicle to deter, inflict shame and harassment and abuse and Deputy Howlett even on occasions would attempt to coerce Plaintiff Townsend to retaliate with resistance so Deputy Howlett could arrest Plaintiff Townsend and per the verbal under oath testimony of Defendant Ron Beck on November 15, 2001, under oath to Judge Raul Palomino Beck did attempt to use the alleged needed actions of Howlett and Jeffers and Smoak to allege that Plaintiff Townsend without lawful duty or cause had to be restrained or blocked from alleged illegal or unlawful conduct at the steps of the Church despite Plaintiff Townsend being a member and fully and completely can prove that Plaintiff Townsend was invited by several members to address in open forum business meeting process per the BY-LAWS duty the issues of frauds and corruption of these Pastors and these same deputies as alleged Trustee's. Plaintiff states that each deputy and officer at all times herein and in all paragraphs above and below appeared to each plaintiff to be acting in their official "mask" or uniform as an officer of the law and that all deputies and officers acted to appear to be within their official roles in order to inflict conspired control, restraint and protection of Plaintiff Townsend to others. Plaintiff Townsend alleges that even Corbin did publicly yell and abuse Plaintiff Townsend to make a public scene for the alleged protection of others despite Corbin as a member of the LRPC Committee fully knowing the pure motives of Plaintiff Townsend. Defendants, while arguing at Plaintiff over Church issues and pastor and others criminal actions and frauds, would yell publicly, chase plaintiff Townsend on foot and in official vehicles and attempted to at times even in uniform cause or Ordered Plaintiff Townsend from his car so Deputies could show

alleged protection and deceptions and frauds and omissions of truthful disclosure and misappropriation of their vested Corporation and Citizens rights to others as these Minor Plaintiffs herein and possibly entice Plaintiff Townsend to resist the harassment and abuse so to cause additional emotional distress to the Minor Plaintiffs herein. Defendant Jeffers even did Touch the Wife of Plaintiff Townsend on the steps of the Church and led her away from talking to Plaintiff Townsend so to make appear that persons were in danger. Defendant Howlett at times stood in front of Plaintiff, who was in his car, blocking him in his seat. Defendant then threatened to arrest Plaintiff and raised his hand to his gun belt as if to need against Plaintiff, all the while standing over Plaintiff and leaving Plaintiff no avenue of escape.

395. Defendant intended to cause apprehension of imminent harm in Plaintiffs in that Defendant Beck had advised Plaintiff Townsend show that defendant's acts were intended as Defendant Beck stated "he would file charges if Plaintiff tried to speak in Church meetings or attend Church or School services and business meetings or school functions and as told to judge Palomino on November 15, 2001, by Defendant Ron Beck and Defendant Employee Karen Harrod Townsend. Defendant approached Plaintiff, who was seated many times in his car, with no intent to harm anyone would be approached and engaged by Defendants threatening to cause violent physical injury by arrest, and then use police type car chases, traffic stops with lights flashing, intervention at the Church Steps prohibiting Plaintiff now fully known to have always been a member of the Corporations with rights not restricted by the Courts but only on November 2-15, 2001, and by Deputy Howlett making false allegations to Curtis Baughman and attending the Court of Judge Palomino stating willingly to give false testimony and , thereby causing

Plaintiff to feel threatened with imminent bodily injury and place him in apprehension for his safety and fear of going to prison. Furthermore, Defendant's acts were substantially certain to result in apprehension of imminent harm in Plaintiff.

396. Because Defendant Howlett made intentional threats to Plaintiff, on April 27, 2000 to “get your hands on the table”, prohibited discovery of FBCCP Materials, prohibited Townsend from the April 30, 2000, Business Meeting and in traffic stops would require Plaintiff to flee the property while just sitting waiting for his children or be chased by Deputy Howlett, Deputy Smoaks and being yelled at and repeatedly chased by Defendant Ron Beck in his vehicle even at one time with a visiting evangelist willing to verbally communicate the threats and chase to pastors at Idlewild Baptist Church and was not restrained in his movements as Plaintiff was, Defendant had the apparent present ability to harm Plaintiff as he was threatening to do and as a direct and proximate result, Plaintiff reasonably feared that Defendant would imminently inflict bodily harm on or put Plaintiff in jail.

397. As a direct and proximate result of Defendant's conduct, Plaintiff was injured in that Plaintiffs were frightened and excited, resulting in a mental and nervous injury that has caused Plaintiff great emotional pain and suffering and loss of his family and loss of his relationship now freely per his civil rights with his children since October 20, 1999, and now having not been able to see his children now since November 8, 2002 and reputation and employment and loss of future ability to earn income and reduction in ability to earn income and defamation and slander.

398. As a further direct and proximate result of Defendant's conduct, Plaintiff has been damaged in the yet undetermined amount of financial damages for the cost of medical

bills, and for lost earnings and the ability to create employment and earnings.

WHEREFORE, Plaintiff demands judgment as follows:

- A. For general damages.
- B. For punitive damages.
- C. For intentional infliction of emotional distress
- D. For costs of suit incurred in this action.
- E. For other and further relief as the Court may deem proper.

COUNT XXXIX

**FOR BATTERY AGAINST DEFENDANTS DEPUTY JOE HOWLETT, DEPUTY
TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN, DEPUTY MIKE SMOAK,
TAMPA POLICE OFFICER JOE KAREAS AND OFFICER MIKE SHAR FOR
ACTS AGAINST PLAINTIFF RANDALL TOWNSEND**

399. Comes Now Plaintiff, Randall Townsend individual, and sues Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar as individuals and as Law Enforcement, Sheriff Deputies and Police officers and for all Minor Plaintiffs and reallege all paragraphs above and below and incorporates herein and alleges:

400. Plaintiff, Randall Townsend, is an individual residing at relevant times in Hillsborough, Sarasota and Pinellas County's of Florida within the jurisdiction of the UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and with rights as a citizen and FBCCP member now not able to be fully known until the production of FBCCP Business Records in June/July 2006, to have Constitutional and BY-LAWS rights to Speech, Assembly, No Child interference with his fathers rights, and Religious freedoms and for life, liberty and pursuit of happiness but to conceal the frauds of pastors and sheriff deputies as masked trustees these defendants did use their Law Enforcement uniforms as masks that all activities of themselves and these clergy and attorneys and judges were lawful and now proved fraud, and collusion as stated herein.

401. Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar are individuals residing within the Counties of Hillsborough and Pasco of, Florida and working or were working at their times of actions or were “on duty” or “off duty” and or now retired as “law enforcement” within the Counties of Hillsborough, Pasco and Pinellas of Florida and within the jurisdiction of the State of Florida and of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA.

402. Plaintiff Townsend restates all paragraphs of Number 4-20 as above herein that show that action is proper within the venue and Jurisdiction of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and Because each Defendant is a resident or was doing or was alleging to do official duties, “on duty” and “off duty” as “law enforcement” or as officers of the courts and this court is a proper venue for this action as stated above herein.

403. This is an action for damages in excess of \$ 25,000.00 and is within the jurisdiction of this court.

404. On or about September 8, 1999, and still through current times and at all other times as stated above and herein at the First Baptist Church of Citrus Park at 7705 Gunn Highway, Tampa Florida, and at 18105 Gunn Highway, Tampa Florida and at the Court Room of Judge Raul Palomino of Hillsborough County on November 15, 2001, by individual and as Deputy Joe Howlett(Howlett) and by Howlett at Citrus Park Town Center Mall on numerous occasions and by Mike Shar at Kmart in Sarasota, Florida and by each Defendant in Count XIII, herein and on surrounding roads at or about Gunn Highway at or around the Citrus Park Baptist Church Defendant assaulted Plaintiff in that

Defendants Howlett and Smoak did use their Deputy Crusiers at times with lights flashing to impede the peaceful operation of Plaintiff Townsend in or out side of his vehicle to deter, inflict shame and harassment and abuse and Deputy Howlett even on occasions would attempt to coerce Plaintiff Townsend to retaliate with resistance so Deputy Howlett could arrest Plaintiff Townsend and per the verbal under oath testimony of Defendant Ron Beck on November 15, 2001, under oath to Judge Raul Palomino Beck did attempt to use the alleged needed actions of Howlett and Jeffers and Smoak to allege that Plaintiff Townsend without lawful duty or cause had to be restrained or blocked from alleged illegal or unlawful conduct at the steps of the Church despite Plaintiff Townsend being a member and fully and completely can prove that Plaintiff Townsend was invited by several members to address in open forum business meeting process per the BY-LAWS duty the issues of frauds and corruption of these Pastors and these same deputies as alleged Trustee's. Plaintiff states that each deputy and officer at all times herein and in all paragraphs above and below appeared to each plaintiff to be acting in their official "mask" or uniform as an officer of the law and that all deputies and officers acted to appear to be within their official roles in order to inflict conspired control, restraint and protection of Plaintiff Townsend to others. Plaintiff Townsend alleges that even Corbin did publicly yell and abuse Plaintiff Townsend to make a public scene for the alleged protection of others despite Corbin as a member of the LRPC Committee fully knowing the pure motives of Plaintiff Townsend. Defendants, while arguing at Plaintiff over Church issues and pastor and others criminal actions and frauds, would yell publicly, chase plaintiff Townsend on foot and in official vehicles and attempted to at times even in uniform cause or Ordered Plaintiff Townsend from his car so Deputies could show

alleged protection and deceptions and frauds and omissions of truthful disclosure and misappropriation of their vested Corporation and Citizens rights to others as these Minor Plaintiffs herein and possibly entice Plaintiff Townsend to resist the harassment and abuse so to cause additional emotional distress to the Minor Plaintiffs herein. Defendant Jeffers even did Touch the Wife of Plaintiff Townsend on the steps of the Church and led her away from talking to Plaintiff Townsend so to make appear that persons were in danger. Defendant Howlett at times stood in front of Plaintiff, who was in his car, blocking him in his seat. Defendant then threatened to arrest Plaintiff and raised his hand to his gun belt as if to need against Plaintiff, all the while standing over Plaintiff and leaving Plaintiff no avenue of escape.

405. Defendant intended to cause apprehension of imminent harm in Plaintiffs in that Defendant Beck had advised Plaintiff Townsend show that defendant's acts were intended as Defendant Beck stated "he would file charges if Plaintiff tried to speak in Church meetings or attend Church or School services and business meetings or school functions and as told to judge Palomino on November 15, 2001, by Defendant Ron Beck and Defendant Employee Karen Harrod Townsend. Defendant approached Plaintiff, who was seated many times in his car, with no intent to harm anyone would be approached and engaged by Defendants threatening to cause violent physical injury by arrest, and then use police type car chases, traffic stops with lights flashing, intervention at the Church Steps prohibiting Plaintiff now fully known to have always been a member of the Corporations with rights not restricted by the Courts but only on November 2-15, 2001, and by Deputy Howlett making false allegations to Curtis Baughman and attending the Court of Judge Palomino stating willingly to give false testimony and , thereby causing

Plaintiff to feel threatened with imminent bodily injury and place him in apprehension for his safety and fear of going to prison. Furthermore, Defendant's acts were substantially certain to result in apprehension of imminent harm in Plaintiff.

406. Because Defendant Howlett made intentional threats to Plaintiff, on April 27, 2000 to “get your hands on the table”, prohibited discovery of FBCCP Materials, prohibited Townsend from the April 30, 2000, Business Meeting and in traffic stops would require Plaintiff to flee the property while just sitting waiting for his children or be chased by Deputy Howlett, Deputy Smoaks and being yelled at and repeatedly chased by Defendant Ron Beck in his vehicle even at one time with a visiting evangelist willing to verbally communicate the threats and chase to pastors at Idlewild Baptist Church and was not restrained in his movements as Plaintiff was, Defendant had the apparent present ability to harm Plaintiff as he was threatening to do and as a direct and proximate result, Plaintiff reasonably feared that Defendant would imminently inflict bodily harm on or put Plaintiff in jail.

407. As a direct and proximate result of Defendant's conduct, Plaintiff was injured in that Plaintiffs were frightened and excited, resulting in a mental and nervous injury that has caused Plaintiff great emotional pain and suffering and loss of his family and loss of his relationship now freely per his civil rights with his children since October 20, 1999, and now having not been able to see his children now since November 8, 2002 and reputation and employment and loss of future ability to earn income and reduction in ability to earn income and defamation and slander.

408. As a further direct and proximate result of Defendant's conduct, Plaintiff has been damaged in the yet undetermined amount of financial damages for the cost of medical

bills, and for lost earnings and the ability to create employment and earnings.

WHEREFORE, Plaintiff demands judgment as follows:

- A. For general damages.
- B. For punitive damages.
- C. For intentional infliction of emotional distress
- D. For costs of suit incurred in this action.
- E. For other and further relief as the Court may deem proper.

COUNT XXXX

FRAUD AGAINST DEFENDANTS DEPUTY JOE HOWLETT, DEPUTY TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN, DEPUTY MIKE SMOAK, TAMPA POLICE OFFICER JOE KAREAS AND OFFICER MIKE SHAR FOR ACTS AGAINST PLAINTIFF RANDALL TOWNSEND

409. Comes Now Plaintiff, Randall Townsend individual, and sues Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar as individuals and as Law Enforcement, Sheriff Deputies and Police officers and for all Minor Plaintiffs and reallege all paragraphs above and below and incorporates herein and alleges:

410. Plaintiff, Randall Townsend, is an individual residing at relevant times in Hillsborough, Sarasota and Pinellas County's of Florida within the jurisdiction of the UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and with rights as a citizen and FBCCP member now not able to be fully known until the production of FBCCP Business Records in June/July 2006, to have Constitutional and BY-LAWS rights to Speech, Assembly, No Child interference with his fathers rights, and Religious freedoms and for life, liberty and pursuit of happiness but to conceal the frauds of pastors and sheriff deputies as masked trustees these defendants did use their Law Enforcement uniforms as masks that all activities of themselves and these clergy and attorneys and judges were lawful and now proved fraud, and collusion as stated herein.

411. Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar are individuals residing within the Counties of Hillsborough and Pasco of, Florida and working or were working at their times of actions or were “on duty” or “off duty” and or now retired as “law enforcement” within the Counties of Hillsborough, Pasco and Pinellas of Florida and within the jurisdiction of the State of Florida and of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA.

412. Plaintiff Townsend restates all paragraphs of Number 4-20 as above herein that show that action is proper within the venue and Jurisdiction of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and Because each Defendant is a resident or was doing or was alleging to do official duties, “on duty” and “off duty” as “law enforcement” or as officers of the courts and this court is a proper venue for this action as stated above herein.

413. This is an action for damages in excess of \$ 25,000.00 and is within the jurisdiction of this court.

414. On or about September 8, 1999, and still through current times and at all other times as stated above and herein at the First Baptist Church of Citrus Park at 7705 Gunn Highway, Tampa Florida, and at 18105 Gunn Highway, Tampa Florida and at the Court Room of Judge Raul Palomino of Hillsborough County on November 15, 2001, by individual and as Deputy Joe Howlett(Howlett) and by Howlett at Citrus Park Town Center Mall on numerous occasions and by Mike Shar at Kmart in Sarasota, Florida and by each Defendant in Count XIII, herein and on surrounding roads at or about Gunn Highway at or around the Citrus Park Baptist Church Defendant assaulted Plaintiff in that

Defendants Howlett and Smoak did use their Deputy Crusiers at times with lights flashing to impede the peaceful operation of Plaintiff Townsend in or out side of his vehicle to deter, inflict shame and harassment and abuse and Deputy Howlett even on occasions would attempt to coerce Plaintiff Townsend to retaliate with resistance so Deputy Howlett could arrest Plaintiff Townsend and per the verbal under oath testimony of Defendant Ron Beck on November 15, 2001, under oath to Judge Raul Palomino Beck did attempt to use the alleged needed actions of Howlett and Jeffers and Smoak to allege that Plaintiff Townsend without lawful duty or cause had to be restrained or blocked from alleged illegal or unlawful conduct at the steps of the Church despite Plaintiff Townsend being a member and fully and completely can prove that Plaintiff Townsend was invited by several members to address in open forum business meeting process per the BY-LAWS duty the issues of frauds and corruption of these Pastors and these same deputies as alleged Trustee's. Plaintiff states that each deputy and officer at all times herein and in all paragraphs above and below appeared to each plaintiff to be acting in their official "mask" or uniform as an officer of the law and that all deputies and officers acted to appear to be within their official roles in order to inflict conspired control, restraint and protection of Plaintiff Townsend to others. Plaintiff Townsend alleges that even Corbin did publicly yell and abuse Plaintiff Townsend to make a public scene for the alleged protection of others despite Corbin as a member of the LRPC Committee fully knowing the pure motives of Plaintiff Townsend. Defendants, while arguing at Plaintiff over Church issues and pastor and others criminal actions and frauds, would yell publicly, chase plaintiff Townsend on foot and in official vehicles and attempted to at times even in uniform cause or Ordered Plaintiff Townsend from his car so Deputies could show

alleged protection and deceptions and frauds and omissions of truthful disclosure and misappropriation of their vested Corporation and Citizens rights to others as these Minor Plaintiffs herein and possibly entice Plaintiff Townsend to resist the harassment and abuse so to cause additional emotional distress to the Minor Plaintiffs herein. Defendant Jeffers even did Touch the Wife of Plaintiff Townsend on the steps of the Church and led her away from talking to Plaintiff Townsend so to make appear that persons were in danger. Defendant Howlett at times stood in front of Plaintiff, who was in his car, blocking him in his seat. Defendant then threatened to arrest Plaintiff and raised his hand to his gun belt as if to need against Plaintiff, all the while standing over Plaintiff and leaving Plaintiff no avenue of escape.

415. Defendant intended to cause apprehension of imminent harm in Plaintiffs in that Defendant Beck had advised Plaintiff Townsend show that defendant's acts were intended as Defendant Beck stated "he would file charges if Plaintiff tried to speak in Church meetings or attend Church or School services and business meetings or school functions and as told to judge Palomino on November 15, 2001, by Defendant Ron Beck and Defendant Employee Karen Harrod Townsend. Defendant approached Plaintiff, who was seated many times in his car, with no intent to harm anyone would be approached and engaged by Defendants threatening to cause violent physical injury by arrest, and then use police type car chases, traffic stops with lights flashing, intervention at the Church Steps prohibiting Plaintiff now fully known to have always been a member of the Corporations with rights not restricted by the Courts but only on November 2-15, 2001, and by Deputy Howlett making false allegations to Curtis Baughman and attending the Court of Judge Palomino stating willingly to give false testimony and , thereby causing

Plaintiff to feel threatened with imminent bodily injury and place him in apprehension for his safety and fear of going to prison. Furthermore, Defendant's acts were substantially certain to result in apprehension of imminent harm in Plaintiff.

416. Because Defendant Howlett made intentional threats to Plaintiff, on April 27, 2000 to “get your hands on the table”, prohibited discovery of FBCCP Materials, prohibited Townsend from the April 30, 2000, Business Meeting and in traffic stops would require Plaintiff to flee the property while just sitting waiting for his children or be chased by Deputy Howlett, Deputy Smoaks and being yelled at and repeatedly chased by Defendant Ron Beck in his vehicle even at one time with a visiting evangelist willing to verbally communicate the threats and chase to pastors at Idlewild Baptist Church and was not restrained in his movements as Plaintiff was, Defendant had the apparent present ability to harm Plaintiff as he was threatening to do and as a direct and proximate result, Plaintiff reasonably feared that Defendant would imminently inflict bodily harm on or put Plaintiff in jail.

417. As a direct and proximate result of Defendant's conduct, Plaintiff was injured in that Plaintiffs were frightened and excited, resulting in a mental and nervous injury that has caused Plaintiff great emotional pain and suffering and loss of his family and loss of his relationship now freely per his civil rights with his children since October 20, 1999, and now having not been able to see his children now since November 8, 2002 and reputation and employment and loss of future ability to earn income and reduction in ability to earn income and defamation and slander.

418. As a further direct and proximate result of Defendant's conduct, Plaintiff has been damaged in the yet undetermined amount of financial damages for the cost of medical

bills, and for lost earnings and the ability to create employment and earnings.

WHEREFORE, Plaintiff demands judgment as follows:

- A. For general damages.
- B. For punitive damages.
- C. For intentional infliction of emotional distress
- D. For costs of suit incurred in this action.
- E. For other and further relief as the Court may deem proper.

COUNT XXXXI

ABUSE OF PROCESS AGAINST DEFENDANTS DEFENDANTS THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA FOR ACTS OF JEB BUSH AND CHARLIE CRIST AND DEFENDANTS THE OFFICE OF THE ATTORNEY GENERAL FOR ACTS OF CHARLIE CRIST AND THE OFFICE OF THE DEPARTMENT OF FINANCIAL SERVICES FOR THE ACTS OF TOM GALLAGHER AND THE OFFICE OF THE STATE ATTORNEY FOR THE ACTS OF MARK A. OBER AND THE ACTS OF CURTIS BAUGHMAN AND THE SANTA ROSA SHERIFF DEPARTMENT FOR THE ACTS OF DEPUTY WHEELER AND HILLSBOROUGH SHERIFF DEPARTMENT AND PASCO SHERIFF DEPARTMENT AND PINELLAS SHERIFF DEPARTMENT AND FOR THE CITY OF TAMPA POLICE DEPARTMENT DEPUTY JOE HOWLETT, DEPUTY TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN, DEPUTY MIKE SMOAK, TAMPA POLICE OFFICER JOE KAREAS AND OFFICER MIKE SHAR AND FDLE FOR ACTS OF AGENTS CINDY SANZ AND GERALD BAILEY AND THE JUDICIAL QUALIFICATIONS COMMISSION FOR ACTS OF BROOK S. KENNERLY AND THE FLORIDA BAR FOR ACTS OF THE EXECUTIVE DIRECTOR AND THE OFFICER OF THE TAMPA BRANCH AND FOR MS. LIEMAN AND FOR JANE CRISTY AND THE DEPARTMENT OF CHILDREN AND FAMILIES FOR THE ACTS OF EXECUTIVE DIRECTOR FOR ACTS AGAINST PLAINTIFF RANDALL TOWNSEND AND AS ALL MINOR CHILDREN AS MEMBERS OF FBCCP AND CPCS

419. Comes Now Plaintiff, Randall Townsend individual, and sues DEFENDANTS THE OFFICE OF THE GOVERNOR OF THE STATE OF FLORIDA FOR ACTS OF JEB BUSH AND CHARLIE CRIST AND DEFENDANTS THE OFFICE OF THE ATTORNEY GENERAL FOR ACTS OF CHARLIE CRIST AND THE OFFICE OF THE DEPARTMENT OF FINANCIAL SERVICES FOR THE ACTS OF TOM

GALLAGHER AND THE OFFICE OF THE STATE ATTORNEY FOR THE ACTS OF MARK A. OBER AND THE ACTS OF CURTIS BAUGHMAN AND THE SANTA ROSA SHERIFF DEPARTMENT FOR THE ACTS OF DEPUTY WHEELER AND HILLSBOROUGH SHERIFF DEPARTMENT AND PASCO SHERIFF DEPARTMENT AND PINELLAS SHERIFF DEPARTMENT AND FOR THE CITY OF TAMPA POLICE DEPARTMENT DEPUTY JOE HOWLETT, DEPUTY TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN, DEPUTY MIKE SMOAK, TAMPA POLICE OFFICER JOE KAREAS AND OFFICER MIKE SHAR AND FDLE FOR ACTS OF AGENTS CINDY SANZ AND GERALD BAILEY AND THE JUDICIAL QUALIFICATIONS COMMISSION FOR ACTS OF BROOK S. KENNERLY AND THE FLORIDA BAR FOR ACTS OF THE EXECUTIVE DIRECTOR AND THE OFFICER OF THE TAMPA BRANCH AND FOR MS. LIEMAN AND FOR JANE CRISTY AND THE DEPARTMENT OF CHILDREN AND FAMILIES FOR THE ACTS OF EXECUTIVE DIRECTOR FOR ACTS AGAINST PLAINTIFF RANDALL TOWNSEND AND AS ALL MINOR CHILDREN AS MEMBERS OF FBCCP AND CPCS and reallege all paragraphs above and below and incorporates herein and alleges:

420. Plaintiffs Townsend, and minor plaintiffs are individual residing at relevant times in Hillsborough, Sarasota and Pinellas County's of Florida within the jurisdiction of the UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and with rights as a citizen and FBCCP member now not able to be fully known until the production of FBCCP Business Records in June/July 2006, to have Constitutional and BY-LAWS rights to Speech, Assembly, No Child interference with his fathers rights, and Religious freedoms and for life, liberty and pursuit of happiness but to conceal the frauds

of pastors and sheriff deputies as masked trustees these defendants did use their Law Enforcement uniforms as masks that all activities of themselves and these clergy and attorneys and judges were lawful and now proved fraud, and collusion as stated herein.

421. Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe

Kareas and Mike Shar are individuals residing within the Counties of Hillsborough and Pasco of, Florida and working or were working at their times of actions or were “on duty” or “off duty” and or now retired as “law enforcement” within the Counties of Hillsborough, Pasco and Pinellas of Florida and within the jurisdiction of the State of Florida and of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA, Plaintiffs allege each defendant herein owed a Federal and State Constitutional Duty to Act for these Plaintiffs and refused to act as fully stated herein this full complaint and now incorporated herein.

422. Plaintiff Townsend restates all paragraphs of Number 4-20 as above herein that show that action is proper within the venue and Jurisdiction of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and Because each Defendant is a resident or was doing or was alleging to do official duties, “on duty” and “off duty” as “law enforcement” or as officers of the courts and this court is a proper venue for this action as stated above herein.

423. This is an action for damages in excess of \$ 25,000.00 and is within the jurisdiction of this court.

424. On or about September 8, 1999, and still through current times and at all other times as stated above and herein at the First Baptist Church of Citrus Park at 7705 Gunn Highway, Tampa Florida, and at 18105 Gunn Highway, Tampa Florida and at the Court Room of Judge Raul Palomino of Hillsborough County on November 15, 2001, by individual and as Deputy Joe Howlett(Howlett) and by Howlett at Citrus Park Town Center Mall on numerous occasions and by Mike Shar at Kmart in Sarasota, Florida and by each Defendant in Count XIII, herein and on surrounding roads at or about Gunn

Highway at or around the Citrus Park Baptist Church Defendant assaulted Plaintiff in that Defendants Howlett and Smoak did use their Deputy Crusiers at times with lights flashing to impede the peaceful operation of Plaintiff Townsend in or out side of his vehicle to deter, inflict shame and harassment and abuse and Deputy Howlett even on occasions would attempt to coerce Plaintiff Townsend to retaliate with resistance so Deputy Howlett could arrest Plaintiff Townsend and per the verbal under oath testimony of Defendant Ron Beck on November 15, 2001, under oath to Judge Raul Palomino Beck did attempt to use the alleged needed actions of Howlett and Jeffers and Smoak to allege that Plaintiff Townsend without lawful duty or cause had to be restrained or blocked from alleged illegal or unlawful conduct at the steps of the Church despite Plaintiff Townsend being a member and fully and completely can prove that Plaintiff Townsend was invited by several members to address in open forum business meeting process per the BY-LAWS duty the issues of frauds and corruption of these Pastors and these same deputies as alleged Trustee's. Plaintiff states that each deputy and officer at all times herein and in all paragraphs above and below appeared to each plaintiff to be acting in their official "mask" or uniform as an officer of the law and that all deputies and officers acted to appear to be within their official roles in order to inflict conspired control, restraint and protection of Plaintiff Townsend to others. Plaintiff Townsend alleges that even Corbin did publicly yell and abuse Plaintiff Townsend to make a public scene for the alleged protection of others despite Corbin as a member of the LRPC Committee fully knowing the pure motives of Plaintiff Townsend. Defendants, while arguing at Plaintiff over Church issues and pastor and others criminal actions and frauds, would yell publicly, chase plaintiff Townsend on foot and in official vehicles and attempted to at times even

in uniform cause or Ordered Plaintiff Townsend from his car so Deputies could show alleged protection and deceptions and frauds and omissions of truthful disclosure and misappropriation of their vested Corporation and Citizens rights to others as these Minor Plaintiffs herein and possibly entice Plaintiff Townsend to resist the harassment and abuse so to cause additional emotional distress to the Minor Plaintiffs herein. Defendant Jeffers even did Touch the Wife of Plaintiff Townsend on the steps of the Church and led her away from talking to Plaintiff Townsend so to make appear that persons were in danger. Defendant Howlett at times stood in front of Plaintiff, who was in his car, blocking him in his seat. Defendant then threatened to arrest Plaintiff and raised his hand to his gun belt as if to need against Plaintiff, all the while standing over Plaintiff and leaving Plaintiff no avenue of escape.

425. Defendant intended to cause apprehension of imminent harm in Plaintiffs in that Defendant Beck had advised Plaintiff Townsend show that defendant's acts were intended as Defendant Beck stated "he would file charges if Plaintiff tried to speak in Church meetings or attend Church or School services and business meetings or school functions and as told to judge Palomino on November 15, 2001, by Defendant Ron Beck and Defendant Employee Karen Harrod Townsend. Defendant approached Plaintiff, who was seated many times in his car, with no intent to harm anyone would be approached and engaged by Defendants threatening to cause violent physical injury by arrest, and then use police type car chases, traffic stops with lights flashing, intervention at the Church Steps prohibiting Plaintiff now fully known to have always been a member of the Corporations with rights not restricted by the Courts but only on November 2-15, 2001, and by Deputy Howlett making false allegations to Curtis Baughman and attending the

Court of Judge Palomino stating willingly to give false testimony and , thereby causing Plaintiff to feel threatened with imminent bodily injury and place him in apprehension for his safety and fear of going to prison. Furthermore, Defendant's acts were substantially certain to result in apprehension of imminent harm in Plaintiff.

426. Because Defendant Howlett made intentional threats to Plaintiff, on April 27, 2000 to “get your hands on the table”, prohibited discovery of FBCCP Materials, prohibited Townsend from the April 30, 2000, Business Meeting and in traffic stops would require Plaintiff to flee the property while just sitting waiting for his children or be chased by Deputy Howlett, Deputy Smoaks and being yelled at and repeatedly chased by Defendant Ron Beck in his vehicle even at one time with a visiting evangelist willing to verbally communicate the threats and chase to pastors at Idlewild Baptist Church and was not restrained in his movements as Plaintiff was, Defendant had the apparent present ability to harm Plaintiff as he was threatening to do and as a direct and proximate result, Plaintiff reasonably feared that Defendant would imminently inflict bodily harm on or put Plaintiff Townsend in jail so Plaintiff Townsend could not protect and serve per his Duties.

427. Defendants did each knowingly intentionally and recklessly refuse to act to prohibit frauds and deceptions in the FBCCP Corporation, (CHURCH & SCHOOL), Courts and in the Surrounding Communities that each Officer, Agent, Agency, Department is sworn by Law to protect and serve per the Florida Statues as stated and incorporated herein but each has refused to doe their duty and refused to act and refused to accept jurisdiction and thus allow frauds and crimes to continue that still damage these Plaintiffs herein and each continues and refuses to act even after contacts within a reasonable time as required as conditions precedent to the filing of this Amended Complaint.

428. As a direct and proximate result of Defendant's conduct, Plaintiffs are injured in that Plaintiffs were frightened and excited, resulting in a mental and nervous injury that has caused Plaintiffs great emotional pain and suffering and loss of family and loss of their relationship now freely per civil rights with his children since October 20, 1999, and now having not been able to see his children now since November 8, 2002 and reputation and employment and loss of future ability to earn income and reduction in ability to earn income and defamation and slander or to protect the Corporation assets so to provide benefits, education and training so all citizens may continue in a productive life, liberty and pursuit of happiness without the duress of these Defendants as violators of the law.

429. As a further direct and proximate result of Defendant's conduct, Plaintiff has been damaged in the yet undetermined amount of financial damages for the cost of medical bills, and for lost earnings and the ability to create employment and earnings.

WHEREFORE, Plaintiff demands judgment as follows:

- A. For general damages.
- B. For punitive damages.
- C. For intentional infliction of emotional distress
- D. For costs of suit incurred in this action.
- E. For other and further relief as the Court may deem proper.

COUNT XXXXII

**CLAIM FOR NEGLIGENT SUPERVISION AGAINST DEFENDANTS
HILLSBOROUGH SHERIFF DEPARTMENT AND PASCO SHERIFF
DEPARTMENT AND PINELLAS SHERIFF DEPARTMENT AND FOR THE
CITY OF TAMPA POLICE DEPARTMENT FOR ACTIONS OF DEPUTY JOE
HOWLETT, DEPUTY TIM JEFFERS, DEPUTY JOHN MICHEAL CORBIN,
DEPUTY MIKE SMOAK, TAMPA POLICE OFFICER JOE KAREAS AND
OFFICER MIKE SHAR FOR ACTS AGAINST PLAINTIFFS AS ALL MINOR
CHILDREN AS MEMBERS OF FBCCP AND CPCS AND AGAINST PLAINTIFF
RANDALL TOWNSEND**

430. Comes Now Plaintiff, Randall Townsend individual, and sues DEFENDANTS

HILLSBOROUGH SHERIFF DEPARTMENT AND PASCO SHERIFF DEPARTMENT AND PINELLAS SHERIFF DEPARTMENT AND FOR THE CITY OF TAMPA POLICE DEPARTMENT FOR NEGLIGENT SUPERVISION OF AND OF TRAINING OF Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe Kareas and Mike Shar as individuals and as Law Enforcement, Sheriff Deputies and Police officers and for all Minor Plaintiffs AND AGAINST PLAINTIFF RANDALL TOWNSEND and reallege all paragraphs above and below and incorporates herein and alleges:

431. Plaintiff, Randall Townsend, is an individual residing at relevant times in Hillsborough, Sarasota and Pinellas County's of Florida within the jurisdiction of the UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and with rights as a citizen and FBCCP member now not able to be fully known until the production of FBCCP Business Records in June/July 2006, to have Constitutional and BY-LAWS rights to Speech, Assembly, No Child interference with his fathers rights, and Religious freedoms and for life, liberty and pursuit of happiness but to conceal the frauds of pastors and sheriff deputies as masked trustees these defendants did use their Law Enforcement uniforms as masks that all activities of themselves and these clergy and attorneys and judges were lawful and now proved fraud, and collusion as stated herein.

433. Defendants Joe Howlett, Tim Jeffers, John Micheal Corbin, Mike Smoak, Joe

Kareas and Mike Shar are individuals residing within the Counties of Hillsborough and Pasco of, Florida and working or were working at their times of actions or were “on duty” or “off duty” and or now retired as “law enforcement” within the Counties of Hillsborough, Pasco and Pinellas of Florida and within the jurisdiction of the State of Florida and of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA.

444. Plaintiff Townsend restates all paragraphs of Number 4-20 as above herein that show that action is proper within the venue and Jurisdiction of this UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA and Because each Defendant is a resident or was doing or was alleging to do official duties, “on duty” and “off duty” as “law enforcement” or as officers of the courts and this court is a proper venue for this action as stated above herein.

445. This is an action for damages in excess of \$ 25,000.00 and is within the jurisdiction of this court.

446. On or about September 8, 1999, and still through current times and at all other times as stated above and herein at the First Baptist Church of Citrus Park at 7705 Gunn Highway, Tampa Florida, and at 18105 Gunn Highway, Tampa Florida and at the Court Room of Judge Raul Palomino of Hillsborough County on November 15, 2001, by individual and as Deputy Joe Howlett(Howlett) and by Howlett at Citrus Park Town Center Mall on numerous occasions and by Mike Shar at Kmart in Sarasota, Florida and by each Defendant in Count XIII, herein and on surrounding roads at or about Gunn Highway at or around the Citrus Park Baptist Church Defendant assaulted Plaintiff in that Defendants Howlett and Smoak did use their Deputy Crusiers at times with lights

flashing to impede the peaceful operation of Plaintiff Townsend in or out side of his vehicle to deter, inflict shame and harassment and abuse and Deputy Howlett even on occasions would attempt to coerce Plaintiff Townsend to retaliate with resistance so Deputy Howlett could arrest Plaintiff Townsend and per the verbal under oath testimony of Defendant Ron Beck on November 15, 2001, under oath to Judge Raul Palomino Beck did attempt to use the alleged needed actions of Howlett and Jeffers and Smoak to allege that Plaintiff Townsend without lawful duty or cause had to be restrained or blocked from alleged illegal or unlawful conduct at the steps of the Church despite Plaintiff Townsend being a member and fully and completely can prove that Plaintiff Townsend was invited by several members to address in open forum business meeting process per the BY-LAWS duty the issues of frauds and corruption of these Pastors and these same deputies as alleged Trustee's. Plaintiff states that each deputy and officer at all times herein and in all paragraphs above and below appeared to each plaintiff to be acting in their official "mask" or uniform as an officer of the law and that all deputies and officers acted to appear to be within their official roles in order to inflict conspired control, restraint and protection of Plaintiff Townsend to others. Plaintiff Townsend alleges that even Corbin did publicly yell and abuse Plaintiff Townsend to make a public scene for the alleged protection of others despite Corbin as a member of the LRPC Committee fully knowing the pure motives of Plaintiff Townsend. Defendants, while arguing at Plaintiff over Church issues and pastor and others criminal actions and frauds, would yell publicly, chase plaintiff Townsend on foot and in official vehicles and attempted to at times even in uniform cause or Ordered Plaintiff Townsend from his car so Deputies could show alleged protection and deceptions and frauds and omissions of truthful disclosure and

misappropriation of their vested Corporation and Citizens rights to others as these Minor Plaintiffs herein and possibly entice Plaintiff Townsend to resist the harassment and abuse so to cause additional emotional distress to the Minor Plaintiffs herein. Defendant Jeffers even did Touch the Wife of Plaintiff Townsend on the steps of the Church and led her away from talking to Plaintiff Townsend so to make appear that persons were in danger. Defendant Howlett at times stood in front of Plaintiff, who was in his car, blocking him in his seat. Defendant then threatened to arrest Plaintiff and raised his hand to his gun belt as if to need against Plaintiff, all the while standing over Plaintiff and leaving Plaintiff no avenue of escape.

447. Defendant intended to cause apprehension of imminent harm in Plaintiffs in that Defendant Beck had advised Plaintiff Townsend show that defendant's acts were intended as Defendant Beck stated "he would file charges if Plaintiff tried to speak in Church meetings or attend Church or School services and business meetings or school functions and as told to judge Palomino on November 15, 2001, by Defendant Ron Beck and Defendant Employee Karen Harrod Townsend. Defendant approached Plaintiff, who was seated many times in his car, with no intent to harm anyone would be approached and engaged by Defendants threatening to cause violent physical injury by arrest, and then use police type car chases, traffic stops with lights flashing, intervention at the Church Steps prohibiting Plaintiff now fully known to have always been a member of the Corporations with rights not restricted by the Courts but only on November 2-15, 2001, and by Deputy Howlett making false allegations to Curtis Baughman and attending the Court of Judge Palomino stating willingly to give false testimony and , thereby causing Plaintiff to feel threatened with imminent bodily injury and place him in apprehension for

his safety and fear of going to prison. Furthermore, Defendant's acts were substantially certain to result in apprehension of imminent harm in Plaintiff.

448. Because Defendant Howlett made intentional threats to Plaintiff, on April 27, 2000 to “get your hands on the table”, prohibited discovery of FBCCP Materials, prohibited Townsend from the April 30, 2000, Business Meeting and in traffic stops would require Plaintiff to flee the property while just sitting waiting for his children or be chased by Deputy Howlett, Deputy Smoaks and being yelled at and repeatedly chased by Defendant Ron Beck in his vehicle even at one time with a visiting evangelist willing to verbally communicate the threats and chase to pastors at Idlewild Baptist Church and was not restrained in his movements as Plaintiff was, Defendant had the apparent present ability to harm Plaintiff as he was threatening to do and as a direct and proximate result, Plaintiff reasonably feared that Defendant would imminently inflict bodily harm on or put Plaintiff in jail.

449. As a direct and proximate result of Defendant's conduct, Plaintiff was injured in that Plaintiffs were frightened and excited, resulting in a mental and nervous injury that has caused Plaintiff great emotional pain and suffering and loss of his family and loss of his relationship now freely per his civil rights with his children since October 20, 1999, and now having not been able to see his children now since November 8, 2002 and reputation and employment and loss of future ability to earn income and reduction in ability to earn income and defamation and slander.

450. As a further direct and proximate result of Defendant's conduct, Plaintiff has been damaged in the yet undetermined amount of financial damages for the cost of medical

bills, and for lost earnings and the ability to create employment and earnings.

WHEREFORE, Plaintiff demands judgment as follows:

- A. For general damages.
- B. For punitive damages.
- C. For intentional infliction of emotional distress
- D. For costs of suit incurred in this action.
- E. For other and further relief as the Court may deem proper.

COUNT XXXXIII
COMPLAINT FOR VICARIOUS LIABILITY OF
PROFESSIONAL CORPORATION FOR MALPRACTICE OF MEMBER
ATTORNEY and VIOLATIONS OF RESPONDENT SUPERIOR---
AGAINST DEFENDANTS JOHN A. GRANT JR. ATTORNEY AND JOHN A
GRANT, JR ATTORNEY AT LAW AND JOHN A GRANT, JR. REGISTERED
AGENT AS OF JOHN A GRANT, JR. INDIVIDUAL

451. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

452. Plaintiff state that the acts as stated herein of Attorney John A. Grant Jr. and John A. Grant, Jr. Individual and John A Grant, JR. Registered Agent were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that JOHN A GRANT JR. ATTORNEY AT LAW, P.A. knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

453. Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statues as stated in Section 5 above herein and was damaged and is continued to be damaged and separated as a father and child now since NOVEMBER 8, 2002, by the frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES

since Defendants became advocates for clients in February 2003, with knowledge and duty to disclose attorneys, judges, pastors, law enforcement and other defendants for their violations of these clients and frauds on the courts.

454. Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

455. WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED BELOW HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

COUNT XXXXIV
COMPLAINT FOR MALPRACTICE OF MEMBER ATTORNEY AS VIOLATIONS BY THEORY OF RESPONDENT SUPERIOR---AGAINST DEFENDANTS JOHN A. GRANT JR. ATTORNEY AND JOHN A GRANT, JR ATTORNEY AT LAW AND JOHN A GRANT, JR. REGISTERED AGENT AS OF JOHN A GRANT, JR. INDIVIDUAL

456. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

457. Plaintiff state that the acts as stated herein of Attorney John A. Grant Jr. and John A. Grant, Jr. Individual and John A Grant, JR. Registered Agent were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that JOHN A GRANT JR. ATTORNEY AT LAW, P.A. knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

458. Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statues as stated in Section 5 above herein and was damaged and is continued to be

damaged and separated as a father and child now since NOVEMBER 8, 2002, by the frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES since Defendants became advocates for clients in February 2003, with knowledge and duty to disclose attorneys, judges, law enforcement, pastors and others for their violations of these clients and frauds on the courts.

459. Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

460. WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

WHEREFORE, plaintiff prays for judgment and relief against defendants and each of them as follows:

- A. A Declaration that each Defendants conduct violated the law as alleged in each cause of action;
- B. A Declaration to abolish the “injunction” section from the Court of Judge Timmerman, limiting the rights of this Plaintiff Townsend as father to his now adult children, J.D.T and J.G.T and restoration of all full rights and expunge all records of these injunctions caused by fraud of the defendants to the court as revealed by Karen Harrod Townend in December 2005, Motion to this Honorable Court no threat of abuse molesting or any vile act exists or ever existed;
- C. preliminary and permanent injunctions preventing defendants and her co-conspirators from any future acts of abuse and slander and harassment to Plaintiffs per s. 741 F.S. and all other Florida Statutes and set severe penalties to warn Defendants and her co-conspirators of future abuse to the peace of these Plaintiffs;
- D. Judgement for the Plaintiff for general and compensatory damages sustained as a result of defendants’ unlawful conduct;
- E. For the following special damages to be awarded according to complete discovery of all proof to the limits allowed by law:
 1. For physical Pain and suffering incurred while Defendants used fraud and
 2. For the Loss of parental rights by Plaintiff Randall Townsend to J.D.T and to J.G.T and
 3. For Emotional Duress and Mental Duress incurred for Defendants use of abuse and fraud
 4. For Loss of honorable reputation of Plaintiff having to endure the slander and defamation and frauds and malice and abuse of process and malicious prosecution and all actions per each count shown herein without counter defense by

- Defendants to off set the malicious charges incurring all special and general damages as stated herein and
5. For all general, compensatory and nominal damages resulting from each Defendants conspiracy and fraud and duress and extortion with Beck and Harrods employer, FBCCP and CPCS and by the extortion and abuse and conspiracy with individuals and co-employees at the place of employment as listed below as these litigants falsely charging this Plaintiff with crimes in order to hide their criminal acts on Plaintiff Randall Townsend and on Minor J.D.T and Minor J.G.T and Defendants conspiracy with:
 - a. Ron Beck, individually, and as FBCCP Corporation Member and Officer
 - b. Herman Meister, individually, and as FBCCP Corporation Member and Officer
 - c. Gary Leatherman, individually, and as Corporation Member and Officer
 - d. Joe Howlett, individually, and as Corporation Member and HCSO Deputy
 - e. Tim Jeffers, individually, and as Corporation Member and as PCSO Deputy
 - f. The FBCCP Corporation
 - g. The Citrus Park Christian School, employees and School Board
 - h. And from the FBCCP Corporation members at Large
 - i. From the abusive conduct practiced on these Pro Se Plaintiffs by Defendants attorneys causing duress and fraud on these Plaintiffs by the frauds of Defendants to attorneys, David Gibbs, III; Drew Gardner; Charles Denny, IV; Stacey Turmel; Charles H. Scruggs, III; Heather Gray and Stanford Solomon;
 - j. For Special Damages in loss of reputation and loss of employment by Plaintiff Randall Townsend in October 2005, flowing from the fraudulent actions by Defendants
 - k. .For Special Damages in loss of reputation and loss of monies owed this Plaintiff Townsend, from SunBelt Equipment Corporation, as damages of Defendants barred litigation as advised by the State Attorney for defamation and slander and lost earnings were at \$1,000,000.00
 6. For damages resulting from Defendants violation of the injunction set by Judge Timmerman and the admitted contact by Harrod with Plaintiff's employer up until October, 2005, and these injunctions in 2001 and 2003-current, and allegations and contacts by these defendants did attribute to Harrods and others and thereby defendants willful negligence and abuse, infliction of emotional duress and harassment in the workplace and loss of employment and loss of earnings and all future earnings because of the frauds and acts of Defendants and the contacts to abuse this Plaintiff to this employer.
 7. For Loss of Earning capacity from the damaged reputation and integrity caused by the attacks and injunctions of Defendants to defame Plaintiff Townsend in the public eye
 8. For lost profits of the home equity valued at \$100,000.00.
 9. For any and all future medical fees and costs and expenses for future medical attention for emotional, physical and mental restoration for these Plaintiffs well being of a future relationship as parent to children and children to this Plaintiff.
 10. For the cost incurred with this action

11. For legal costs and fees in all court cases
12. For any and all attorney's fee's as Plaintiff Randall Townsend, had retained the Attorneys Firms of CHARLES H. SCRUGGS, P.A and HEATHER M. GRAY to represent these Plaintiffs in these actions and agreed to pay Attorney's Charles H. Scruggs, P.A. and Heather M. Gray a reasonable attorney fee which should be returned with interest.
13. For such and further relief as this court may deem proper
14. For any and all other Compensatory Damages
15. For CONSEQUENTIAL DAMAGES
16. Plaintiff request leave to amend pleading to request Punitive damages at time that is just and proper per these pleadings.
17. FOR EXEMPLARY DAMAGES
18. FOR ALL NOMINAL DAMAGES
19. FOR TREBLE DAMAGES
20. AND For any and all additional sanctions, awards and retributions, this court seems just to allow.
21. FOR A JURY TRIAL ON ALL ISSUES TRIABLE OF RIGHT BY JURY.

COUNT XXXXV
COMPLAINT FOR VICARIOUS LIABILITY OF
PROFESSIONAL CORPORATION FOR MALPRACTICE OF MEMBER
ATTORNEY and VIOLATIONS OF RESPONDENT SUPERIOR---AGAINST
DEFENDANTS DAVID GIBBS III ATTORNEY AND DREW GARDNER
ATTORNEY AND AS THE GIBBS LAW FIRM AND OR THE CHRISTIAN LAW
ASSOCIATION AS OF DAVID GIBBS III, INDIVIDUAL AND DREW
GARDNER INDIVIDUAL -

461. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

462. Plaintiff state that the acts as stated herein of Attorney David Gibbs, III and David Gibbs, III, Individual and Attorney Drew Gardner and Drew Gardner, Individual were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that THE GIBBS LAW FIRM AND OR THE CHRISTIAN LAW ASSOCIATION knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

463. Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statutes as stated in Section 5 above herein and was damaged and is continued to be damaged and separated as a father and child now since NOVEMBER 8, 2002, by the frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES since Defendants became advocates for clients in February 2003, with knowledge and duty to disclose attorneys, judges, law enforcement, and other defendants for their violations of these clients and frauds on the courts.

464. Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

465. WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED BELOW HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

COUNT XXXXVI
COMPLAINT FOR MALPRACTICE OF MEMBER ATTORNEY AS VIOLATIONS BY THEORY OF RESPONDENT SUPERIOR---AGAINST DEFENDANTS DAVID GIBBS III ATTORNEY AND DREW GARDNER ATTORNEY AND AS THE GIBBS LAW FIRM AND OR AS THE CHRISTIAN LAW ASSOCIATION AS OF DAVID GIBBS III, INDIVIDUAL AND DREW GARDNER INDIVIDUAL

466. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

467. Plaintiff state that the acts as stated herein of Attorney David Gibbs, III and David Gibbs, III, Individual and Attorney Drew Gardner and Drew Gardner, Individual were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that THE GIBBS LAW FIRM AND OR THE CHRISTIAN LAW

ASSOCIATION knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

468. Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statutes as stated in Section 5 above herein and was damaged and is continued to be damaged and separated as a father and child now since NOVEMBER 8, 2002, by the frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES since Defendants became advocates for clients in February 2003, with knowledge and duty to disclose attorneys, judges, pastors, law enforcement and other defendants for their violations of these clients and frauds on the courts.

469. Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

470. WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

WHEREFORE, plaintiff prays for judgment and relief against defendants and each of them as follows:

- A. A Declaration that each Defendants conduct violated the law as alleged in each cause of action;
- B. A Declaration to abolish the "injunction" section from the Court of Judge Timmerman, limiting the rights of this Plaintiff Townsend as father to his now adult children, J.D.T and J.G.T and restoration of all full rights and expunge all records of these injunctions caused by fraud of the defendants to the court as revealed by Karen Harrod Townend in December 2005, Motion to this Honorable Court no threat of abuse molesting or any vile act exists or ever existed;

- C. preliminary and permanent injunctions preventing defendants and her co-conspirators from any future acts of abuse and slander and harassment to Plaintiffs per s. 741 F.S. and all other Florida Statutes and set severe penalties to warn Defendants and her co-conspirators of future abuse to the peace of these Plaintiffs;
- D. Judgement for the Plaintiff for general and compensatory damages sustained as a result of defendants' unlawful conduct;
- E. For the following special damages to be awarded according to complete discovery of all proof to the limits allowed by law:
- F. For physical Pain and suffering incurred while Defendants used fraud and
- G. For the Loss of parental rights by Plaintiff Randall Townsend to J.D.T and to J.G.T and
- H. For Emotional Duress and Mental Duress incurred for Defendants use of abuse and fraud
- I. For Loss of honorable reputation of Plaintiff having to endure the slander and defamation and frauds and malice and abuse of process and malicious prosecution and all actions per each count shown herein without counter defense by Defendants to off set the malicious charges incurring all special and general damages as stated herein and
- J. For all general, compensatory and nominal damages resulting from each Defendants conspiracy and fraud and duress and extortion with Beck and Harrods employer, FBCCP and CPCS and by the extortion and abuse and conspiracy with individuals and co-employees at the place of employment as listed below as these litigants falsely charging this Plaintiff with crimes in order to hide their criminal acts on Plaintiff Randall Townsend and on Minor J.D.T and Minor J.G.T and Defendants conspiracy with:
 - 1. Ron Beck, individually, and as FBCCP Corporation Member and Officer
 - 2. Herman Meister, individually, and as FBCCP Corporation Member and Officer
 - 3. Gary Leatherman, individually, and as Corporation Member and Officer
 - 4. Joe Howlett, individually, and as Corporation Member and HCSO Deputy
 - 5. Tim Jeffers, individually, and as Corporation Member and as PCSO Deputy
 - 6. The FBCCP Corporation
 - 7. The Citrus Park Christian School, employees and School Board
 - 8. And from the FBCCP Corporation members at Large
 - 9. From the abusive conduct practiced on these Pro Se Plaintiffs by Defendants attorneys causing duress and fraud on these Plaintiffs by the frauds of Defendants to attorneys, David Gibbs, III; Drew Gardner; Charles Denny, IV; Stacey Turmel; Charles H. Scruggs, III; Heather Gray and Stanford Solomon;
- K. For Special Damages in loss of reputation and loss of employment by Plaintiff Randall Townsend in October 2005, flowing from the fraudulent actions by Defendants
- L. For Special Damages in loss of reputation and loss of monies owed this Plaintiff Townsend, from SunBelt Equipment Corporation, as damages of Defendants barred litigation as advised by the State Attorney for defamation and slander and lost earnings were at \$1,000,000.00

- M. For damages resulting from Defendants violation of the injunction set by Judge Timmerman and the admitted contact by Harrod with Plaintiff's employer up until October, 2005, and these injunctions in 2001 and 2003-current, and allegations and contacts by these defendants did attribute to Harrods and others and thereby defendants willful negligence and abuse, infliction of emotional duress and harassment in the workplace and loss of employment and loss of earnings and all future earnings because of the frauds and acts of Defendants and the contacts to abuse this Plaintiff to this employer.
- N. For Loss of Earning capacity from the damaged reputation and integrity caused by the attacks and injunctions of Defendants to defame Plaintiff Townsend in the public eye
- O. For lost profits of the home equity valued at \$100,000.00.
- P. For any and all future medical fees and costs and expenses for future medical attention for emotional, physical and mental restoration for these Plaintiffs well being of a future relationship as parent to children and children to this Plaintiff.
- Q. For the cost incurred with this action
- R. For legal costs and fees in all court cases
- S. For any and all attorney's fee's as Plaintiff Randall Townsend, had retained the Attorneys Firms of CHARLES H. SCRUGGS, P.A and HEATHER M. GRAY to represent these Plaintiffs in these actions and agreed to pay Attorney's Charles H. Scruggs, P.A. and Heather M. Gray a reasonable attorney fee which should be returned with interest.
- T. For such and further relief as this court may deem proper
- U. For any and all other Compensatory Damages
- V. For CONSEQUENTIAL DAMAGES
- W. Plaintiff request leave to amend pleading to request Punitive damages at time that is just and proper per these pleadings.
- X. FOR EXEMPLARY DAMAGES
- Y. FOR ALL NOMINAL DAMAGES
- Z. FOR TREBLE DAMAGES
- AA. AND For any and all additional sanctions, awards and retributions, this court seems just to allow.
- BB. FOR A JURY TRIAL ON ALL ISSUES TRIABLE OF RIGHT BY JURY.

COUNT XXXXVII
COMPLAINT FOR VICARIOUS LIABILITY OF
PROFESSIONAL CORPORATION FOR MALPRACTICE OF MEMBER
ATTORNEY and VIOLATIONS OF RESPONDENT SUPERIOR--- AGAINST
DEFENDANTS CHARLES H. SCRUGGS, III ATTORNEY AND CHARLES H.
SCRUGGS III, P.A. AS OF CHARLES H. SCRUGGS III, INDIVIDUAL

471. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.
472. Plaintiff state that the acts as stated herein of Attorney Charles H. Scruggs, III and

Charles H. Scruggs, Individual were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that HEATHER GRAY ATTORNEY AT LAW, P.A. knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

473. Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statutes as stated in Section 5 above herein and was damaged and is continued to be damaged and separated as a father and child now since NOVEMBER 8, 2002, by the frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES since Defendants became advocates for clients in February 2003, with knowledge and duty to disclose attorneys, judges, law enforcement, pastors and other defendants for their violations of these clients and frauds on the courts.

474. Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

475. WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED BELOW HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

COUNT XXXXVIII
COMPLAINT FOR MALPRACTICE OF MEMBER ATTORNEY AS VIOLATIONS BY THEORY OF RESPONDENT SUPERIOR---AGAINST DEFENDANTS CHARLES H. SCRUGGS, III ATTORNEY AND CHARLES H. SCRUGGS III, P.A. AS OF CHARLES H. SCRUGGS III, INDIVIDUAL

476. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

477. Plaintiff state that the acts as stated herein of Attorney Charles H. Scruggs, III and Charles H. Scruggs III, Individual were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that CHARLES SCRUGGS,P.A.

knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

478. Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statutes as stated in Section 5 above herein and was damaged and is continued to be damaged and separated as a father and child now since NOVEMBER 8, 2002, by the frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES since Defendants became advocates for clients in February 2003, with knowledge and duty to disclose attorneys, judges, pastors, law enforcement and other defendants for their violations of these clients and frauds on the courts.

479. Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

480. WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

WHEREFORE, plaintiff prays for judgment and relief against defendants and each of them as follows:

- A. A Declaration that each Defendants conduct violated the law as alleged in each cause of action;

- B. A Declaration to abolish the “injunction” section from the Court of Judge Timmerman, limiting the rights of this Plaintiff Townsend as father to his now adult children, J.D.T and J.G.T and restoration of all full rights and expunge all records of these injunctions caused by fraud of the defendants to the court as revealed by Karen Harrod Townend in December 2005, Motion to this Honorable Court no threat of abuse molesting or any vile act exists or ever existed;
- C. preliminary and permanent injunctions preventing defendants and her co-conspirators from any future acts of abuse and slander and harassment to Plaintiffs per s. 741 F.S. and all other Florida Statutes and set severe penalties to warn Defendants and her co-conspirators of future abuse to the peace of these Plaintiffs;
- D. Judgement for the Plaintiff for general and compensatory damages sustained as a result of defendants’ unlawful conduct;
- E. For the following special damages to be awarded according to complete discovery of all proof to the limits allowed by law:
- F. For physical Pain and suffering incurred while Defendants used fraud and
- G. For the Loss of parental rights by Plaintiff Randall Townsend to J.D.T and to J.G.T and
- H. For Emotional Duress and Mental Duress incurred for Defendants use of abuse and fraud
- I. For Loss of honorable reputation of Plaintiff having to endure the slander and defamation and frauds and malice and abuse of process and malicious prosecution and all actions per each count shown herein without counter defense by Defendants to off set the malicious charges incurring all special and general damages as stated herein and
- J. For all general, compensatory and nominal damages resulting from each Defendants conspiracy and fraud and duress and extortion with Beck and Harrods employer, FBCCP and CPCS and by the extortion and abuse and conspiracy with individuals and co-employees at the place of employment as listed below as these litigants falsely charging this Plaintiff with crimes in order to hide their criminal acts on Plaintiff Randall Townsend and on Minor J.D.T and Minor J.G.T and Defendants conspiracy with:
 - 1. Ron Beck, individually, and as FBCCP Corporation Member and Officer
 - 2. Herman Meister, individually, and as FBCCP Corporation Member and Officer
 - 3. Gary Leatherman, individually, and as Corporation Member and Officer
 - 4. Joe Howlett, individually, and as Corporation Member and HCSO Deputy
 - 5. Tim Jeffers, individually, and as Corporation Member and as PCSO Deputy
 - 6. The FBCCP Corporation
 - 7. The Citrus Park Christian School, employees and School Board
 - 8. And from the FBCCP Corporation members at Large
 - 9. From the abusive conduct practiced on these Pro Se Plaintiffs by Defendants attorneys causing duress and fraud on these Plaintiffs by the frauds of Defendants to attorneys, David Gibbs, III; Drew Gardner; Charles Denny, IV; Stacey Turmel; Charles H. Scruggs, III; Heather Gray and Stanford Solomon;

- K. For Special Damages in loss of reputation and loss of employment by Plaintiff Randall Townsend in October 2005, flowing from the fraudulent actions by Defendants
- L. For Special Damages in loss of reputation and loss of monies owed this Plaintiff Townsend, from SunBelt Equipment Corporation, as damages of Defendants barred litigation as advised by the State Attorney for defamation and slander and lost earnings were at \$1,000,000.00
- M. For damages resulting from Defendants violation of the injunction set by Judge Timmerman and the admitted contact by Harrod with Plaintiff's employer up until October, 2005, and these injunctions in 2001 and 2003-current, and allegations and contacts by these defendants did attribute to Harrods and others and thereby defendants willful negligence and abuse, infliction of emotional duress and harassment in the workplace and loss of employment and loss of earnings and all future earnings because of the frauds and acts of Defendants and the contacts to abuse this Plaintiff to this employer.
- N. For Loss of Earning capacity from the damaged reputation and integrity caused by the attacks and injunctions of Defendants to defame Plaintiff Townsend in the public eye
- O. For lost profits of the home equity valued at \$100,000.00.
- P. For any and all future medical fees and costs and expenses for future medical attention for emotional, physical and mental restoration for these Plaintiffs well being of a future relationship as parent to children and children to this Plaintiff.
- Q. For the cost incurred with this action
- R. For legal costs and fees in all court cases
- S. For any and all attorney's fee's as Plaintiff Randall Townsend, had retained the Attorneys Firms of CHARLES H. SCRUGGS, P.A and HEATHER M. GRAY to represent these Plaintiffs in these actions and agreed to pay Attorney's Charles H. Scruggs, P.A. and Heather M. Gray a reasonable attorney fee which should be returned with interest.
- T. For such and further relief as this court may deem proper
- U. For any and all other Compensatory Damages
- V. For CONSEQUENTIAL DAMAGES
- W. Plaintiff request leave to amend pleading to request Punitive damages at time that is just and proper per these pleadings.
- X. FOR EXEMPLARY DAMAGES
- Y. FOR ALL NOMINAL DAMAGES
- Z. FOR TREBLE DAMAGES
- AA. AND For any and all additional sanctions, awards and retributions, this court seems just to allow.
- BB. FOR A JURY TRIAL ON ALL ISSUES TRIABLE OF RIGHT BY JURY.

COUNT XXXXIX
COMPLAINT FOR VICARIOUS LIABILITY OF
PROFESSIONAL CORPORATION FOR MALPRACTICE OF MEMBER
ATTORNEY and VIOLATIONS OF RESPONDENT SUPERIOR---AGAINST
DEFENDANTS CHARLES DENNY IV ATTORNEY AND CHARLES DENNY IV
ATTORNEY AT LAW AND JAMES ROLFES ATTORNEY AND JAMES

**ROLFES ATTORNEY AT LAW AND THE FIRM OF DICKINSON & GIBBONS
AS OF CHARLES DENNY INDIVIDUAL AND JAMES ROLFES INDIVIDUAL**

480. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

481. Plaintiff state that the acts as stated herein of Attorney Charles Denny, IV and Charles Denny IV Individual and Attorney James Rolfes and James Rolfes Individual were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that DICKINSON & GIBBONS P.A. knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

482. Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statues as stated in Section 5 above herein and was damaged and is continued to be damaged and separated as a father and child now since NOVEMBER 8, 2002, by the frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES since Defendants became advocates for clients in February 2003, with knowledge and duty to disclose attorneys, judges, law enforcement, pastors and other defendants for their violations of these clients and frauds on the courts.

483. Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

484. WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED BELOW HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

COUNT XXXXX
COMPLAINT FOR MALPRACTICE OF MEMBER ATTORNEY AS
VIOLATIONS BY THEORY OF RESPONDENT SUPERIOR---AGAINST
DEFENDANTS CHARLES DENNY IV ATTORNEY AND CHARLES DENNY IV
ATTORNEY AT LAW AND JAMES ROLFES ATTORNEY AND JAMES
ROLFES ATTORNEY AT LAW AND THE FIRM OF DICKINSON & GIBBONS
AS OF CHARLES DENNY INDIVIDUAL AND JAMES ROLFES INDIVIDUAL

485. Plaintiff's reallege all paragraphs all preliminary allegations and subsequent allegations as stated herein and incorporate these allegations herein by reference.

486. Plaintiff state that the acts as stated herein of Attorney Charles Denny, IV and Charles Denny IV Individual and Attorney James Rolfes and James Rolfes Individual were practices in violations of laws and Rules of Civil Procedure and Rules of Judicial Procedure and that DICKINSON & GIBBONS P.A., knowingly, intentionally, recklessly and negligently participated in the deceptions, frauds, omissions of truthful disclosures and acts as stated herein to these clients and to the courts and law enforcement officers.

487. Plaintiffs as Clients reasonably relied on defendants' representations and omissions and as a proximate result thereof were deceived as to file causes of actions and promote causes of available actions and protections from violations continuing of the Florida Statues as stated in Section 5 above herein and was damaged and is continued to be damaged and separated as a father and child now since NOVEMBER 8, 2002, by the frauds and CONCEALMENTS and OMISSIONS OF TRUTHFUL DISCLOSURES since Defendants became advocates for clients in February 2003, with knowledge and duty to disclose attorneys, judges, law enforcement, pastors and other defendants for their violations of these clients and frauds on the courts.

488. Plaintiffs allege by the omissions of truthful disclosure and frauds against Plaintiffs that Plaintiffs did not contribute to the damages caused by Defendants.

489. WHEREFORE, PLAINTIFFS REQUEST ALL RELIEF FOR DAMAGES AS STATED HEREIN AND ANY OTHER RELIEF AS THIS COURT DEEMS PROPER.

WHEREFORE, plaintiff prays for judgment and relief against defendants and each of them as follows:

- A. A Declaration that each Defendants conduct violated the law as alleged in each cause of action;
- B. A Declaration to abolish the “injunction” section from the Court of Judge Timmerman, limiting the rights of this Plaintiff Townsend as father to his now adult children, J.D.T and J.G.T and restoration of all full rights and expunge all records of these injunctions caused by fraud of the defendants to the court as revealed by Karen Harrod Townend in December 2005, Motion to this Honorable Court no threat of abuse molesting or any vile act exists or ever existed;
- C. preliminary and permanent injunctions preventing defendants and her co-conspirators from any future acts of abuse and slander and harassment to Plaintiffs per s. 741 F.S. and all other Florida Statues and set severe penalties to warn Defendants and her co-conspirators of future abuse to the peace of these Plaintiffs;
- D. Judgement for the Plaintiff for general and compensatory damages sustained as a result of defendants’ unlawful conduct;
- E. For the following special damages to be awarded according to complete discovery of all proof to the limits allowed by law:
- F. For physical Pain and suffering incurred while Defendants used fraud and
- G. For the Loss of parental rights by Plaintiff Randall Townsend to J.D.T and to J.G.T and
- H. For Emotional Duress and Mental Duress incurred for Defendants use of abuse and fraud
- I. For Loss of honorable reputation of Plaintiff having to endure the slander and defamation and frauds and malice and abuse of process and malicious prosecution and all actions per each count shown herein without counter defense by Defendants to off set the malicious charges incurring all special and general damages as stated herein and
- J. For all general, compensatory and nominal damages resulting from each Defendants conspiracy and fraud and duress and extortion with Beck and Harrods employer, FBCCP and CPCS and by the extortion and abuse and conspiracy with individuals and co-employees at the place of employment as listed below as these litigants falsely charging this Plaintiff with crimes in order to hide their criminal acts on Plaintiff Randall Townsend and on Minor J.D.T and Minor J.G.T and Defendants conspiracy with:
 1. Ron Beck, individually, and as FBCCP Corporation Member and Officer
 - 2.Herman Meister, individually, and as FBCCP Corporation Member and Officer
 - 3.Gary Leatherman, individually, and as Corporation Member and Officer
 - 4.Joe Howlett, individually, and as Corporation Member and HCSO Deputy
 - 5.Tim Jeffers, individually, and as Corporation Member and as PCSO Deputy
 6. The FBCCP Corporation

7. The Citrus Park Christian School, employees and School Board
8. And from the FBCCP Corporation members at Large
- K. From the abusive conduct practiced on these Pro Se Plaintiffs by Defendants attorneys causing duress and fraud on these Plaintiffs by the frauds of Defendants to attorneys, David Gibbs, III; Drew Gardner; Charles Denny, IV; Stacey Turmel; Charles H. Scruggs, III; Heather Gray and Stanford Solomon;
- L. For Special Damages in loss of reputation and loss of employment by Plaintiff Randall Townsend in October 2005, flowing from the fraudulent actions by Defendants
- M. For Special Damages in loss of reputation and loss of monies owed this Plaintiff Townsend, from SunBelt Equipment Corporation, as damages of Defendants barred litigation as advised by the State Attorney for defamation and slander and lost earnings were at \$1,000,000.00
- N. For damages resulting from Defendants violation of the injunction set by Judge Timmerman and the admitted contact by Harrod with Plaintiff's employer up until October, 2005, and these injunctions in 2001 and 2003-current, and allegations and contacts by these defendants did attribute to Harrods and others and thereby defendants willful negligence and abuse, infliction of emotional duress and harassment in the workplace and loss of employment and loss of earnings and all future earnings because of the frauds and acts of Defendants and the contacts to abuse this Plaintiff to this employer.
- O. For Loss of Earning capacity from the damaged reputation and integrity caused by the attacks and injunctions of Defendants to defame Plaintiff Townsend in the public eye
- P. For lost profits of the home equity valued at \$100,000.00.
- Q. For any and all future medical fees and costs and expenses for future medical attention for emotional, physical and mental restoration for these Plaintiffs well being of a future relationship as parent to children and children to this Plaintiff.
- R. For the cost incurred with this action
- S. For legal costs and fees in all court cases
- T. For any and all attorney's fee's as Plaintiff Randall Townsend, had retained the Attorneys Firms of CHARLES H. SCRUGGS, P.A and HEATHER M. GRAY to represent these Plaintiffs in these actions and agreed to pay Attorney's Charles H. Scruggs, P.A. and Heather M. Gray a reasonable attorney fee which should be returned with interest.
- U. For such and further relief as this court may deem proper
- V. For any and all other Compensatory Damages
- W. For CONSEQUENTIAL DAMAGES
- X. Plaintiff request leave to amend pleading to request Punitive damages at time that is just and proper per these pleadings.
- Y. FOR EXEMPLARY DAMAGES
- Z. FOR ALL NOMINAL DAMAGES
- AA. FOR TREBLE DAMAGES
- BB. AND For any and all additional sanctions, awards and retributions, this court seems just to allow.
- CC. FOR A JURY TRIAL ON ALL ISSUES TRIABLE OF RIGHT BY JURY.

COUNT XXXXXI

CLAIM FOR TORT INTERFERENCE WITH CHILD CUSTODY
AGAINST ALL DEFENDANTS

COMES NOW PLAINTIFF RANDALL TOWNSEND, PRO SE, AND AS FATHER OF J.D.T and J.G.T who at the start of these litigation issues was 15 and 14, respectively and states:

490. Plaintiffs herein restate all paragraphs above and below and incorporate herein **and sues all defendants named above and incorporates herein.**

491. Per **STONE V. WALL** 734 So2d 1038(Fla.1999), the elements of a cause of action for Intentional Interference with parent-child relationship are:“(1) that plaintiff has a superior custody right to the child, and (2) that defendant intentionally interfered with such right, (3) without consent of the parent and the basis for this position of law is on the sanctity of the parent-child relationship, not on the loss of services.”

492. Plaintiff Townsend as the father alleges that at any custody case hearing if held on September 8, 1999, as the day this Father/Church elected leader/honorable citizen would have gained full legal custody of J.D.T and J.G.T but for the fraud and collusion of the mother, Karen Harrod Townsend intentionally, knowingly, willingly and recklessly refusing to not conspire with her employers as alleged pastors, clergy, but self-dealing criminals in violation of the FBCCP BY-LAWS and Federal, State, and Labor Laws who were intentionally, knowingly, willingly and recklessly “hiding and masked” as “clergy” but using their mask for unlawful purposes. This father states that he had to address these employer clergy due to the abuse, battery, and unlawful acts against the wife and others as teacher/employees and for the daily violations against the children as stated in this Complaint and to show other violations when or if ever any court of true law obeys Rules of Law and allows this Elected Investigative Member and Childrens Awana Commander

to get the Church Financial Records exposed now even after over 50 Court Demands and 10 years of preparation of legal alignment of the Corporation to the Law.

493. Plaintiff Townsend states that had not these alleged “Clergy”, “trustees as sheriff deputies”, “attorneys ie Grant, Gibbs, Gardner” On September 8, 1999, Followed the Rules of Law as stated by Judge Crenshaw in May 10, 2006, and September 7, 2006, and “Scruggs and Gray and Denny and Judges” not conspired to give “unlawful” Benefit to Clergy in violation of §775.03 F.S. and followed §617 F.S.

494. On September 8, 1999, the interference with the Custody rights would have easily been given to this Father due to the mental, physical, emotional, criminal and financial incompetent, derelict and abusive state and actions of the mother Karen Harrod Townsend, if ever evaluated by true professionals not conspiring with Dr. Lon Lynn with ulterior and biased motives. Plaintiff Townsend states that the collusion by alleged “employer clergy and sheriff deputies as allegedly trustees” conspiring and willfully working together with Dr. Lon Lynn allowed tort interference with child custody to become the extortion to kidnap the rights of these Plaintiffs from these Plaintiffs so to conceal, continue, and procrastinate the revealing of the criminal facts that the clergy, trustees and Dr. Lynn knew would all send them to jail at that time and lead to their reputation ruin but as a band they intentionally, knowingly, recklessly continue their tort battery and violations of the By-Laws and continued interference with labor laws, child parent rights, misappropriation of corporate (a Church) opportunity in order to for themselves continue criminal acts.

495. Plaintiff Townsend states that now the exposed true “personal convictions” and demented mental state of former Judge now unknowingly how after reading the February

16, 2007, letter of any person allegedly as a skilled legal advocate as still an attorney Charles Scruggs is revealed, the facts show his demented legal advice, ex parte actions and conspiracy with all Judges to continue to do extrinsic, intrinsic and fraud on the court and with the full cooperation of Judges as shown in the “voluminous” case files even that Scruggs could not reveal to Judge Palomino or to Judge Timmerman or any Judge full “custody” rights of his clients Randall Townsend or J.D.T. or J.G.T or any other minor child as this would violate his at that time unreported concealed “personal convictions” and intentional acts to violate the RULES of LAW as reported in 2006, by Judge Crenshaw who then recused herself as an accomplice per **Pellgerini**. As a participant in the now 10 years of Malicious Prosecution against this Father/Elected Investigative Church Leader trying to live peacefully with all Civil Rights as the Constitutions of these United States and State of Florida Allow and protect.

496. Plaintiffs state that by the actions of all Defendants, Plaintiffs have been damaged, stressed, prohibited a child/parent relationship and had to endure every crime as reported above and now included herein as per the May 10, 2006, words of Judge Crenshaw reading the elements of malicious prosecution while Plaintiff Townsend tries to implement §607.1603 as stated in Complaint 02-03812 and on page 27, after hearing this point in the complaint Judge Crenshaw extends the damages and multiple times tells Plaintiff Townsend to “be quiet” during presentation of legal points of now proved true laws” of attorneys and Judges and all Defendants and Judge Crenshaw states on page 57, Line 13, “Lack of probable cause in instituting or continuing a criminal or civil proceeding against another if the circumstances are not sufficient to cause a reasonably cautious person to believe that the person accused is guilty of the offense charged or the

claim made is justified” and “Continuing a proceeding” in this case has only been allowed by defendants giving “unlawful” “Benefit to Clergy” and still to themselves and do not produce documents or other requested testimony that will allow Plaintiff to “present a case still to a jury” because of the malicious and illegal alleged Rules of Law Acts now discredited by the words of Judge Crenshaw on May 10, 2006, Page 57,:

“One acts maliciously in instituting or continuing a criminal/civil proceeding against another if he does so for the primary purpose of injuring the other or recklessly and without regard to whether the proceeding is justified or for any purpose except to bring the offender to justice or to establish what he considers a meritorious claim.”

But Judges and Attorneys still withhold production of truth from this Plaintiff/Father as living his life now as a convicted criminal since the frauds of alleged “Clergy” because of “Frauds and Collusions” of alleged “Clergy/Trustees/the criminals including the now former wife/mother”. Even Denny still protest discovery of the elements of the Divorce Case and production (1/07) of the records of the employer of the brother of Karen Harrod Townsend as this will show incompetence of the now former wife, but Denny knows will prove his acts since the start are to run up costs and do violations of RULES OF LAW.

497. WHEREFORE PLAINTIFFS DEMAND :
- A. REMOVAL OF THE FRAUDULENTLY GAINED DIVORCE INJUNCTION OF JUDGE TIMMERMAN OF 2003, still active.
 - B. Restore “WHOLE the rights and wellbeing of these Plaintiffs” due to the violations of Contract Law and Tort Actions by ALL defendants.
 - C. Grant any and all damages as allowed by RULES OF LAW.
 - D. Legally bring charges to a Grand Jury and Prosecute all offenders of the Law
 - E. Grant any and all relief allowed by the courts of LAW.
 - F. Grant a Jury Trial on all issues.

COUNT XXXXXII
CLAIM FOR TORT INTERFERENCE BY MALICIOUS PROSECUTION
AGAINST ALL DEFENDANTS

COMES NOW PLAINTIFF RANDALL TOWNSEND, PRO SE, AND AS

FATHER OF J.D.T and J.G.T who at the start of these litigation issues was 15 and 14, respectively and states:

498. Plaintiffs herein restate all paragraphs above and below and incorporate herein **and sues all defendants named above and incorporates herein.**

499. Plaintiff Townsend specifically herein repeats all paragraphs of:

COUNT XXXXXI and COUNT VI as Ruled Complete! by Judge Crenshaw.

500. Plaintiff therefore have been damaged by the knowingly, intentionally, recklessly and negligent Malicious Prosecution of Plaintiff Townsend in violation of each “Right” as listed above herein and for each claim as stated herein.

501. WHEREFORE, PLAINTIFFS make a full claim for any and all relief per the RULES OF LAW to be made “Whole and Complete” but for the reckless violations of RULES OF LAW and Dutiful Conduct as fully stated by Defendants herein and seeks any and all recoverable damages including punitive, compensatory, legal fees and costs and any further relief this court is allowed.

CLAIM FOR CLASS ACTION

WHEREFORE, PLAINTIFF REQUEST THIS COURT RULE ON THE ACTION HEREIN AS A CLASS ACTION CASE FOR THE BENEFIT OF ALL ALLEGATIONS STATED HEREIN AS PLAINTIFF PLEADS, INDIVIDUALLY AND ON BEHALF OF OTHERS SIMILARLY SITUATED.

RESPECTFULLY SUBMITTED:

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