

**Markowitz Trustee v. Tavares’s Miami River Park Marina, Inc v. BRIXRIV, LLC – The Sham Contradictory Case No. 2012-021975-CA-22 (“Markowitz-BRIXRIV”) to Deprive and Extort Tavares Under Color of Law upon Subverted Courts in Miami-Dade County, Florida**

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
1	June 30, 2011	<u>U. S. CODE TITLE 18</u>	Markowitz Trusty Ringel Hartog Ross Robert Hartog LKLSG, LLP Thomas Ralph Lehman Hall, Hall & Leto Matthew Paul Leto The Continued Criminal Enterprise
2		§ 1349 Conspiracy to Commit Mail & Wire Fraud & § 1341 Mail Fraud	

On or about June 30, 2011, Markowitz Ringel Trusty + Hartog, P.A. f.k.a. Markowitz Davis Ringel & Trusty, P.A., Escrow Agents (“Markowitz Trustee”) at 9130 South Dadeland Boulevard, Suite 1800, Miami, Florida 33156-7849, submits, to further a criminal scheme<sup>1</sup> stealing, depriving and extorting Tavares of rights and all of his properties upon sham court proceedings, via U.S. Mail, a fraudulent invoice No. 167047, File Reference No. U92:062090 Environmental Escrow, for fraudulent legal services to: Miami River Park Marina, Inc. – Mr. Charles Tavares at 444 Brickell Avenue, Miami, Florida 33131, charging Tavares and his company Miami River Park Marina, Inc., a Florida Corporation (“MRPM”), and fraudulently charging Tavares and his company MRPM, among other things: “06/27/11 RRH (Ross Robert Hartog, “Hartog”) (Florida Bar No. 272.360), E-mails and telephone calls with Mr. Leto (Matthew Paul Leto) (“Leto”) (Florida Bar No. 14.504) (Hall, Hall & Lamb, P.A., “Hall, Hall & Leto”), T. Lehman (Thomas Ralph Lehman) (“Lehman”) (Florida Bar No. 351.318) (at Levine Kellogg Lehman Schneider + Grossman LLP “LKLSG”), and Envirospec (Envirospec, Inc., a Florida Corporation, Tax Id. #65-0594263) “regarding environmental escrow and environmental work in light of the real estate foreclosure. 1.30 hr. of Services Rendered, with partial amount of \$552.50 - hourly rate of \$425.00.” See Markowitz Trustee Invoice of 06/30/2011.

**COUNTS**

**Count 1-** Hartog, Markowitz Trustee, and other Perpetrators implicated, officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States of America, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

**Count 2 -** Hartog, Markowitz Trustee, and other Perpetrators implicated, to further their criminal scheme subverting Florida courts to steal, deprive, and extort Tavares of rights and properties, knowingly and intentionally, use U.S. Mail for the purpose of executing their scheme, in violation of 18 U.S.C. §1341.

<sup>1</sup> The *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. The Bank of New York Mellon*, sham Case No.2009-93058-CA-30 (the “BRIDGELOAN”). See [Charles Tavares's Sworn Affidavit of 11/27/2022](#).

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
3	April 6, 2012	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the United States of America	Markowitz Trusty Ringel Hartog Ross Robert Hartog LKLSG, LLP Thomas Ralph Lehman Hall, Hall & Leto Matthew Paul Leto The Continued Criminal Enterprise

On or about April 6, 2012, at 9:55 a.m., Markowitz Ringel Trusty + Hartog, P.A., Escrow Agents f.k.a. Markowitz Davis Ringel & Trusty, P.A., Escrow Agents (“Markowitz Trustee”) at 9130 South Dadeland Boulevard, Suite 1800, Miami, Florida 33156-7849, to further a criminal scheme<sup>2</sup> subverting courts of law in the United States of America, to further steal, deprive and extort Tavares of rights and all of his properties upon sham court proceedings, submits, via E-mail, a correspondence from Ross Robert Hartog (“Hartog”) (Florida Bar No. 272.360) at Markowitz Trustee (E-mail: RHartog@mrthlaw.com), to, Thomas Ralph Lehman (“Lehman”) (Florida Bar No. 351.318) at Levine Kellogg Lehman Schneider & Grossman, LLP (“LKLS&G”), showing:

“Subject: Miami River

Tom

Hope all is well. Property owner wants control of escrow money. Would your client object?

Thanks.

Ross Hartog.” See E-mail of April 6, 2012, from *Charles Tavares v. Thomas R. Lehman & LKLSG*, Legal Malpractice Suit, Case No. 2013-012223-CA-01, at Exhibit #LKLS&G 00007502.

#### COUNTS

**Count 3-** Hartog, Markowitz Trustee, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

<sup>2</sup> Implicated attorney Lehman at LKLS&G, after being fired by client Charles Tavares in April 2011, upon Tavares uncovering Lehman, LKLSG, Leto, Hall, Hall & Leto, and other Perpetrators’ schemes stealing, depriving, and extorting Tavares in the *Bridgeloan Investors, Inc. v. Charles Tavares, et al.*, sham Case No. 2009-93058-CA-30 (the “BRIDGELoAN”), under color of law, shamelessly stays, following orders from the Criminal Enterprise, knowingly and intentionally, in a 16-month unauthorized and fraudulent representation of Tavares’s companies, Brickell Village One, LLC,, a Florida L.L.C. (“Brickell Village One”), 2147 S.W. 7th Street, LLC, a Florida L.L.C. (“2147”), and Miami River Park Marina, Inc., a Florida Corporation (“MRPM”), before the subverted Miami Courts, in furtherance of the scheme, and to obstruct justice and cover up, together with other officers of the courts implicated, their brazen criminal schemes upon the courts by the Criminal Enterprise. See [Charles Tavares’s Sworn Affidavit of 11/27/2022](#).

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
4	June 5, 2012	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the United States of America &	LKLSG, LLP Thomas Ralph Lehman FBT Avocats SA Olten Ayres de Abreu Jr.
5		§ 241 Conspiracy Against Rights &	Markowitz Trusty Ringel Hartog Ross Robert Hartog
6		§ 1346 Scheme/Artifice to Defraud Honest Services &	BRIXRIV, LLC Bridgeloan Investors, Inc. Joseph H. Horn
7		§ 1349 Conspiracy to Commit Mail & Wire Fraud &	Ralph Horn Ricardo Eichenwald Fernando Braghin
8		§ 1343 Wire Fraud &	BANIF Brickell, LLC Marco Antonio de Souza
9		§ 1961 <i>et seq.</i> – RICO &	Pedro Serzedelo Jorge C. Pais
10		<b>FLORIDA BAR RULES OF CONDUCT</b> Misconduct –Dishonesty-Fraud-Deceit Rule 4-8.4 (a)(b)(c)(d)	Raul Marques Hugo Barreto Del Priore NS Corporate Services, Inc. Nelson Slosbergas Matthew Paul Leto The Continued Criminal Enterprise

On or about June 5, 2012, criminal Associates Olten Ayres de Abreu Jr. (“Abreu Jr.”) (Brazil OAB-SP 75.820) (e-mail: oabreu@fbt.ch) at FBT Avocats SA (“FBT Avocats”) in Geneva, Switzerland , and Thomas Ralph Lehman (“Lehman”) (Florida Bar No. 351.318) (e-mail: trl@lkls.com) at Levine Kellogg Lehman Schneider + Grossman LLP (“LKLSG”), in Miami, Florida, in furtherance of ongoing<sup>3</sup> scheme by a Cotnined Criminal Enterprise (“Criminal Enterprise” or “CCE”) subverting courts of law in Florida to steal, deprive, and extort Tavares of rights and all his properties, under color of law, show Associates exchanging emails, conspiring jointly and together, and with other Perpetrators implicated, to steal, deprive and extort Tavares and his company Miami River Park Marina, Inc., a Florida Corp. (“MRPM”) of more than \$100,000, held in a trust account that Tavares initially deposited \$500,000 in July 2005 for his MRPM at Markowitz Davis Ringel & Trusty, P.A., Escrow Agents n.k.a. Markowitz Ringel Trusty + Hartog, P.A. (“Markowitz Trustee”).<sup>4</sup> The CCE’s scheme follows the same *modus operandi* of continuing systematically subverting courts to steal, deprive, and extort Tavares and his companies of all assets and rights, and depleting Tavares of financial resources, and time to fight the Criminal Enterprise, and obstructing justice, covering up the schemes. See E-mail Exhibit LKLS&G #00008522, on Tavares’ Legal Malpractice Suit *Charles Tavares v. Thomas Ralph Lehman & LKLSG*, Case No.2013-012223-CA-01.

<sup>3</sup> The *Bridgeloan Investors, Inc. v. Charles Tavares, et al.*, sham Case No.2009-93058-CA-30 (the “BRIDGELoAN”); *Brickell Commerce Plaza, Inc. & The Car Wash Concept, Inc. v. Charles Tavares*, sham Case No.2011-29624-CA-30 (the “BCP/Car Wash”); and, *Geania A. Fraga v. Charles Tavares*, sham Case No. 2012-003753-FC-04 (“FRAGA I”). See [Charles Tavares’s Sworn Affidavit of 11/27/2022](#).

<sup>4</sup> Markowitz Trustee’s longtime partner and former president, Joseph I. Davis, Jr., now a Miami judge (“Judge Davis Jr.”), at the same time is participating in conflict, in another ongoing scheme, knowingly and intentionally depriving and extorting Tavares of rights and properties, under color of law, in the FRAGA I sham Case. *Id.*

## COUNTS

**Count 4-** The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

**Count 5-** The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

**Count 6-** The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

**Count 7-** The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to implement their criminal scheme to defraud the United States of America, the State of Florida, and Tavares, by using, *e.g.*, interstate communications and wires to further the criminal scheme, in violation of 18 U.S.C. §1349.

**Count 8-** The Perpetrators, repeatedly, knowingly and deliberately, transmit and cause to be transmitted electronic mail across state lines to further their known criminal scheme extorting and defrauding, among others, the United States of America, the State of Florida, and Tavares, in violation of 18 U.S.C. §1343. *See, e.g.*, Abreu Jr.'s e-mail ([oabreu@fbt.ch](mailto:oabreu@fbt.ch)) to Lehman ([trl@lklsg.com](mailto:trl@lklsg.com)), and others, on June 5, 2012 at 4:31 p.m.; and, Lehman's e-mail response on June 5, 2012 at 6:47 p.m. *See* E-Mail Records LKLS&G #00008522, on Tavares' Legal Malpractice suit *Charles Tavares v. Thomas Ralph Lehman & LKLSG*, Case No.2013-012223-CA-01.

**Count 9-** At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

**Count 10** – Lehman, an officer of the court, knowingly and intentionally uses his Florida Bar license as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, repeatedly making patently false statements in writing to mislead the Miami Court to falsely incriminate, steal, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT, stating; “A lawyer shall not: **(a)** violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through acts of another; **(b)** commit a criminal act that reflects adversely on the lawyer’s honesty, trustworthiness, or fitness as a lawyer in other respects; **(c)** engage in conduct involving dishonesty, fraud, deceit, or misrepresentation, except that it shall not be professional misconduct for a lawyer for a criminal law enforcement agency or regulatory agency to advise others about or to supervise another in an undercover investigation, unless prohibited by law or rule, and it shall not be professional misconduct for a lawyer employed in a capacity other than as a lawyer by a criminal law enforcement agency or regulatory agency to participate in an undercover investigation, unless prohibited by law; **(d)** engage in conduct in connection with the practice of law that is prejudicial to the administration of justice, including to knowingly, or through callous indifference, disparage, humiliate, or discriminate against litigants, jurors, witnesses, court personnel, or other lawyers on any basis, including but not limited to , on account of race, ethnicity, gender, religion, national origin, disability, marital status, sexual orientation, age, socioeconomic status, employment, or physical characteristic;” See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4 (a)(b)(c)(d) at [www.floridabar.org](http://www.floridabar.org).

## **THE NINE RELATED CASES BY THE SAME CRIMINAL ENTERPRISE DEPRIVING & EXTORTING TAVARES**

The Criminal Enterprise, after secretly entrapping Tavares and Tavares's Companies in an underlying scheme with torts and businesses interference, and surrounding Tavares by Associates, launch schemes to deprive and extort Tavares, under color of law, of all of Tavares's Properties and Rights in nine (09) sham Related Cases, showing fraud upon the courts, in subverted courts, presided by same corrupt judges, *e.g.*, Allan Lester Langer (Florida Bar No. 137.828), Joseph I. Davis, Jr. (Florida Bar No. 155.299), and Norma S. Lindsey (Florida Bar No. 994.812), and implicated officers of the courts, that, willfully and recklessly disregard the truth and the law, to further the schemes extorting and depriving Tavares, see BRIDGELoAN Case No.2009-93058-CA-30; BNY Mellon Case No.2010-26864-CA-30; BCP/ Car Wash Case No. 2011-29624-CA-30; and, Deutsche Bank Case No. 2012-20197-CA-30. See [Tavares Sworn Affidavit](#).

### THE 2009 BRIDGELoAN INVESTORS SHAM CASE v. TAVARES AND TAVARES'S COMPANIES

The sham case, *Bridgeloan Investors, Inc., a Florida corporation* ("BRIDGELoAN") (Tax Id. 65-0665516) v. Charles Tavares ("Tavares"), *Brickell Village One, LLC, a Florida L.L.C.* ("Brickell Village One") (Tax Id. # 58-2674804), *2147 S.W. 8TH Street, LLC, a Florida L.L.C.* ("2147") (Tax Id. # 59- 3768934), and *Miami River Park Marina, Inc., a Florida corp.* ("MRPM") (Tax Id. # 20-3168472), v. *MUNB Loan Holdings, LLC* ("BNY Mellon") ("**BRIDGELoAN**" case), filed on December 24, 2009, presided by corrupt Judges Allan Lester Langer and Norma Shepard Lindsey, predicated on an underlying scheme by Tavares's attorneys, in conflicted lending, tortious interference, sabotaging deals, spreading false information and making bogus offers to devalue Tavares's properties by Jeff Flick, *et al.*, to defraud and extort Tavares - unbeknownst and undisclosed at the time, Associates of a Criminal Enterprise, *e.g.*, Marco Rojas ("Rojas") (Florida Bar No.940.453), Thomas Lehman ("Lehman") (Florida Bar No.351.318), Alan S. Fine ("Fine") (Florida Bar No. 385.824), Nicholas Stanham ("Stanham") (Florida Bar No.38.822), Stephen A. Freeman ("Freeman") (Florida Bar No. 146.795), Robert M. Haber ("Haber") (Florida Bar No. 131.614), and Nelson Slosbergas ("Slosbergas") (Florida Bar No.378.887), extorting more than \$50 million dollars of properties and rights upon subverted courts, using fraudulent Affidavits by BRIDGELoAN's principal Joseph Horn ("Horn"), fabricating false and fraudulent secret power of attorneys ("POAs") for Tavares's Companies by Lehman and Associates Olten Ayres de Abreu Jr. ("Abreu Jr.") (Brazil OAB-SP 75.820) at FBT Avocats SA ("FBT Avocats") in Switzerland, and Ramon Anzola-Robles ("Anzola-Robles") at Anzola Robles & Asociados and Global Corporate Consultants in the Republic of Panama, secretly fabricated and used without Tavares' knowledge or consent, as the sole authority for Tavares's Companies, in a sham mediation of March 29, 2011, by, Lehman, Larry A. Stumpf ("Stumpf") (Florida Bar No. 280.526) at Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), and Matthew P. Leto ("Leto") (Florida Bar No. 14.504) at Hall, Hall & Leto, P.A. Upon Tavares' uncovering the fraudulent settlement for Tavares' Brickell Village One, 2147, and MRPM, predicated on bogus POAs' authority, Tavares is threatened, coerced, and extorted on April 7, 2011, by his own attorneys Lehman and Stumpf, under color of law. Next day, the Perpetrators quickly hold a sham unnoticed and invalid "trial", on April 8, 2011, to "legalize" the fraudulent settlement, further shown on a spurious Notice of Trial after the sham trial. Following the massive and systematic frauds upon the courts, Lehman, after being fired by Tavares, stays for 16 months in a fraudulent representation of Tavares's Companies to cover up. Then, Tavares's new attorneys at Buchanan Ingersoll & Rooney, P.C. ("Buchanan Ingersoll") after filing motions exposing the frauds upon the court, are successfully threatened, and extorted by criminal Leto, and others implicated, and ordered by the criminals to withdraw the motion and stop representing Tavares. The Criminal Enterprise uses, among others, Associates BNY Mellon, and BANIF Securities ("BANIF"), to launder the illicit proceeds, across state lines, quickly transferring the properties, stealing all proceeds, and demolishing Brickell Village's Buildings to cover up. See Record, and [Tavares Sworn Affidavit](#).

THE 2010 SHAM CASE THE BANK OF NEW YORK MELLON – FLICK MORTGAGE INVESTORS v. TAVARES

On September 1, 2006, as part of an underlying scheme by a Criminal Enterprise comprised of reckless attorneys, among others, Marco E. Rojas (“Rojas”) (Florida Bar No.940.453), Thomas R. Lehman (“Lehman”) (Florida Bar No.351.318), Alan S. Fine (“Fine”) (Florida Bar No. 385.824), Nicholas Stanham (“Stanham”) (Florida Bar No.38.822), Stephen A. Freeman (“Freeman”) (Florida Bar No. 146.795), Robert M. Haber (“Haber”) (Florida Bar No. 131.614), and Nelson Slosbergas (“Slosbergas”) (Florida Bar No.378.887), and Joseph Horn (“Horn”), Ralph Horn (“Ralph”), Ricardo Eichenwald (“Eichenwald”), at Bridgeloan Investors, Inc., a Florida corporation (Tax Id. #65-0665516) a.k.a. H2A Capital Corp. and Bridgeinvest, LLC, a Florida L.L.C. (Tax Id. #45-3188071) (collectively, “BRIDGELoAN”), and Jeffrey B. Flick (“Jeff Flick”), Sandra Flick (“Sandra”), and Francisco Ruiz (Ruiz”) at Flick Mortgage Investors, Inc., a Florida corporation (“Flick Mortgage”) (Tax Id. #59-2936881), Associates of the Criminal Enterprise, to further an underlying scheme to deprive, steal, and extort Charles Tavares (“Tavares”), and Tavares’s Companies of all properties and rights, entrap Tavares into a home loan with their company Flick Mortgage in order to secretly interfere with Tavares’s businesses and cause a default. Unbeknownst and undisclosed at the time, Tavares’s attorneys Rojas, Haber, Stanham, and Freeman, at Freeman Haber Rojas & Stanham, LLP (“FHR&S”) representing Tavares personally in the loan closing with Flick Mortgage, are all Associates of the Criminal Enterprise, and together with Associates at BRIDGELoAN, systematically use financial institutions to further deprive, steal, and extort their unsuspecting clients of all properties and rights. After years of successful tortious interference with a business relationship by Tavares’s attorneys at FHR&S, and Associates Flick Mortgage and BRIDGELoAN, among other things, sabotaging deals, depreciating Tavares’s Companies assets with bogus offers, spreading false rumors, coercing and extorting Tavares’s investors, the Criminal Enterprise successfully causes Tavares’s loans into default, so they can deploy their underlying scheme to deprive, steal, and extort, under color of law, Tavares of all properties and rights, upon subverted courts in the Eleventh Judicial Circuit in Miami-Dade County, Florida (“Miami Courts”). *The Bank of New York Mellon v. Charles Tavares*, and Flick Mortgage Investors, Inc. (“**BNY Mellon**” suit), Case No. 2010-26864-CA-30, is intentionally assigned by the subverted Miami Courts to same corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), already presiding the sham BRIDGELoAN case, intentionally and knowingly, committing systematic violations of law, procedural rules, the constitution, and Tavares’s rights, to further the successful criminal racket. Following corrupt Judge Langer’s retirement in December 2012, the Criminal Enterprise directs the subverted Miami Courts to assign all of Tavares’s sham Related Cases to Judge Norma Shepard Lindsey (“Judge Lindsey”) (Florida Bar No. 994.812), an Associate of the Criminal Enterprise, and wife to implicated Associate Harold Eugene Lindsey III (“Lindsey III”) (Florida Bar No. 130.338), an attorney for The Bank of New York Mellon (“BNY Mellon”) at Katz Barron. To further the criminal racket upon the subverted Miami Courts, corrupt Judge Lindsey, knowingly and intentionally, commit major violations of law, the constitution, and Tavares’s rights, systematically depriving and extorting Tavares of properties and rights, under color of law. In the BNY Mellon sham case, corrupt Judge Lindsey, in reckless disregard for the law, the constitution, Tavares’s rights, and Florida Code of Judicial Conduct, Canons 1, 2, and 3, among other violations, stays presiding the sham BNY Mellon case in a willful conflict of interest for fourteen (14) months, only recusing after making sure, through willful systematic violations of law and rights, under color of law, to further the scheme, that Tavares loses his homestead property, appraised at the time for more than \$2.1 million, in lieu of a mortgage of about \$1.2 million, intentionally caused into default by the Criminal Enterprise’s scheme, to her husband’s client BNY Mellon. See Record Case No. 2010-26864-30 at Miami Courts, and [Tavares Sworn Affidavit](#).

## THE 2011 BCP & CAR WASH v. TAVARES SHAM CASE TO EXTORT TAVARES OF ALL PROPERTIES & RIGHTS

On September 15, 2011, as part of an ongoing and continue underlying scheme by a Global Criminal Enterprise\* (“Criminal Enterprise”), systematically depriving, stealing, and extorting, under color of law, Charles Tavares (“Tavares”) of all properties and rights upon subverted proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Russell Marc Landy (“Landy”) (Florida Bar No. 44.417), and Gabriela Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), file, with unclean hands,\*\* after hijacking Tavares’s Companies Brickell Commerce Plaza, Inc., a Florida corp. (“BCP”) and The Car Wash Concept, Inc., a Florida corp. (“Car Wash”), a sham and fraudulent suit to improperly remove Tavares from Tavares’s Companies BCP and Car Wash, in the, *Brickell Commerce Plaza, Inc., a Florida corporation and The Car Wash Concept, Inc., a Florida corporation v. Charles Tavares* (“**BCP/Car Wash**”), Case No. 2011-29624-CA-30. The Criminal Enterprise directs the subverted Miami Courts to assign BCP/Car Wash’s sham case to corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), already concurrently extorting Tavares in Related Cases, to continue systematically, knowingly and intentionally, depriving and extorting Tavares of properties and rights, allowing the criminals to hijack Tavares’s Companies with false, invalid, fraudulent, and contradictory pleadings and evidence, falsely claiming authority of Tavares’s Companies BCP and Car Wash, issuing fraudulent sham Orders upon sham hearings, unilaterally set by the criminals when they all knew Tavares is out of the Country to deprive Tavares of due process and rights, and allowing criminals Peter, Rojas, and Guimaraes to secretly and fraudulently sell and transfer to Walgreens Co., for \$6.7 million, across state lines, Tavares’s Companies’ properties at 250 S.W. 7 Street, Miami, Florida, 33131, on February 20, 2014, valued at the time, more than \$15 million dollars, stealing all ill-gotten proceeds. After corrupt Judge Langer retires in December 2012, the Criminal Enterprise causes corrupt Judge Norma S. Lindsey (“Judge Lindsey”) (Florida Bar No.994.812) to preside all Tavares’ Related Cases, to continue the successful continued extortion, and to obstruct justice, to silence Tavares, under color of law. See [Tavares Sworn Affidavit](#).

\* The Criminal Enterprise is created in the early 1990’s by reckless attorneys Stephen A. Freeman (“Freeman”) (Florida Bar No. 146.795), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Robert M. Haber (“Haber”) (Florida Bar No. 131.614), Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nicholas Stanham (“Stanham”) (Florida Bar No. 38.822), joining together by criminals Joseph Horn (“Horn”) and Ricardo Eichenwald (“Eichenwald”) at Bridgeloan Investors, Inc., a Florida corporation, at the time, primarily focused on intercontinental money laundering of billions of dollars of illicit-sourced funds through the United States of America, tax evasion and frauds, portfolio tax-free bond frauds, and major bank and mortgage frauds. As the Criminal Enterprise’s businesses exponentially grows, they are joined by other bad actors, domestic and foreign, e.g., Thomas R. Lehman (Lehman”) (Florida Bar No. 351.318), Peter at Damian & Valori, LLP (“Valori”), and BANIF Bank’s Hugo Barreto Del Priore (“Del Priore”) and Sergio Capela (“Capela”), Edward Decaso (“Decaso”), and Marco Antonio de Souza (“De Souza”) – that jointly, swindled more than \$800 million of dollars of assets from BANIF, causing BANIF to fail in 2015, and also joined by ODEBRECHT Construction’s offshoots, and Rubens Menin Teixeira de Souza (“Rubens Menin”), Joao Vitor Nazareth Menin Teixerira de Souza (Joao Vitor Menin”), and Ernesto Pereira Lopes (“Lopes”), at AHS Residential, LLC n.k.a. RESIA, LLC, a.k.a. MRV Engenharia e Participações S.A. (“RESIA” or “MRV”), now, creating a global criminal syndicate to corrupt and subvert the judicial, political, and law enforcement machinery in the United States of America, and elsewhere they operate. See Record.

\*\* To further the scheme, the criminals, among others, Guimaraes, Rojas, Slosbergas, and Peter, have reckless attorney Stewart L. Kasner (“Kasner”) (Florida Bar No.119.131), at Baker & McKenzie, to, knowingly and intentionally, fabricate numerous bogus corporate documents for Tavares’s BCP and Car Wash, among others, false, invalid, and fraudulent corporate resolutions of authority, of June 28 and 29, 2011, purportedly from BCP’s “Sole Shareholder”, falsely removing Tavares as BCP and Car Wash’s sole president, manager, and director. Kasner, and the criminals implicated, all know, in truth, and in fact, and corporate records shows, that, Tavares, at all relevant times, is one of two (02)shareholders of BCP, and Tavares is the only sole legal authority to speak and/or act on behalf of BCP and Car Wash, and Tavares never authorized reckless attorney Kasner, or anyone else, to fabricate, among others, the false, invalid, and fraudulent resolutions of June 28 and 29, 2011. See Record.



THE FEBRUARY 2012 FABRICATED FRAGA I DOMESTIC REPEAT VIOLENCE SHAM CASE v. TAVARES

The Criminal Enterprise, showing reckless disregard for the law, and its evil powers to freely and systematically subvert courts of law in the United States to further criminal rackets against, *e.g.*, the United States, the State of Florida, and U.S. citizens, following the Criminal Enterprise's Associate Peter F. Valori's ("Peter") (Florida Bar No. 43.516), Damian & Valori, LLP a.k.a. Damian Valori | Culmo ("Valori") threats of November 10, 2011 at 5:04 p.m. against Charles Tavares ("Tavares"), the Criminal Enterprise causes Geania A. Fraga ("Fraga"), a Manager/Agent of BRIDGELOAN/BANIF, to file, with unclean hands, on February 13, 2012, a first false and fabricated sham case of Domestic Repeat Violence against Charles Tavares ("Tavares"), *Geania A. Fraga v. Charles Tavares ("FRAGA I")*, Case No. 2012-03753-FC-04, supported by absurd fabricated false claims, and supported by three (03) false witnesses – including, among others, criminal Gabriela Maranhao Machado Guimaraes ("Guimaraes"), Martiza C. Calix ("Calix"), and Dunia Irene Pacheco ("Pacheco"), assisted by criminal Russell Marc Landy ("Landy") (Florida Bar No. 44.417), at Valori, represented by implicated attorney Silvia Perez ("Perez") (Florida Bar No. 505.374). As part of the scheme, the Criminal Enterprise causes the subverted Miami Courts to assign the sham Fraga I case to be presided by corrupt Judge Joesph I. Davis Jr. ("Judge Davis Jr.") (Florida Bar No. 155.299), a former partner and president, from 1980 through 2010, of Markowitz Davis Ringel & Trusty P.A. n.k.a. Markowitz Ringel Trusty & Hartog, P.A.\* ("Markowitz Trustee"), to extort and deprive, under color of law, Tavares' rights and properties. The fabricated sham FRAGA I suit is filed, to, among other things, simultaneously falsely incriminate, coerce, intimidate, and extort Tavares into stopping fighting and exposing the Criminal Enterprise, depriving, stealing, and extorting Tavares of all properties and rights, among others, of more than \$50 million dollars in the *Bridgeloan Investors, Inc., a Florida corporation ("BRIDGELOAN") v. Charles Tavares ("Tavares"), Brickell Village One, LLC, a Florida L.L.C. ("Brickell Village One"), 2147 S.W. 8TH Street, LLC, a Florida L.L.C. ("2147"), and Miami River Park Marina, Inc., a Florida corporation ("MRPM") v. MUNB Loan Holdings, LLC ("BNY Mellon")* (the "BRIDGELOAN" case); and, in *The Bank of New York Mellon v. Charles Tavares, and, Flick Mortgage Investors, Inc.* ("BNY Mellon" suit), Case No. 2010-26864-CA-30, to cause Tavares to lose his homestead property and about \$1 million in excess equity; and, in the sham *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. vs. Charles Tavares* ("BCP/Car Wash" suit), filed, with fabricated false, and fraudulent authority of Tavares's Companies BCP and Car Wash, against Tavares, by the Criminal Enterprise's Associates Peter and Landy at Valori, and Guimaraes to deprive, steal, and extort Tavares of millions of dollars, all presided by the same implicated corrupt Judges, Allan Lester Langer ("Judge Langer") (Florida Bar No. 137.828), and Norma S. Lindsey ("Judge Lindsey") (Florida Bar No. 994.812) , to further the criminal racket upon subverted proceedings. See [Tavares Sworn Affidavit](#).

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\* In July 2005, as part of an elaborate artifice in the underlying scheme by Associates of the Criminal Enterprise, among others, criminals Thomas R. Lehman ("Lehman") (Florida Bar No. 351.318), and Marco E. Rojas ("Rojas") (Florida Bar No. 940.453), both representing unsuspecting client Tavares upon the United States Bankruptcy for the Southern District of Florida ("Bankruptcy Court"), in a case presided by Judge Robert A. Mark ("Judge Mark") (Florida Bar No.260.886), where Tavares is buying a certain 9 acres Miami River Property at 2051 N.W. 11 Street, Miami, Florida 33125 ("Marina Property") – one of two Properties later extorted from Tavares in the BRIDGELOAN Case, from Consolidated Yacht Corporation ("Consolidated") (Tax Id. #65-0242347), having Alan L. Goldberg ("Trustee Goldberg"), and Ross Robert Hartog ("Hartog") (Florida Bar No. 272.360) at Markowitz Trustee, as Consolidated's Registered Agent, see [www.sunbiz.org](http://www.sunbiz.org), at Document #S28046, filed on May 16, 2005, Tavares deposits five hundred thousand dollars (\$500,000) into Markowitz Trustee's Account. On June 6, 2012, Hartog, and criminals at BRIDGELOAN, and Matthew P. Leto ("Leto") (Florida Bar No. 14.504), file, with unclean hands, as part of the scheme, a sham Related suit, *Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent v. BRIXRIV, LLC, and Miami River Park Marina, Inc.*, Case No.2012-21795-CA-22, successfully extorting, under color of law, the trust account's moneys. See Record.

THE 2012 DEUTSCHE BANK v. TAVARES CASE UPON SUBVERTED MIAMI COURTS EXTORTING TAVARES

As part of an underlying scheme by the Criminal Enterprise, to deprive, steal, and extort Charles Tavares ("Tavares") of all properties and rights, upon subverted court proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), during years, surreptitiously entraps Tavares into secret businesses interests, conflicted real estate and loan transactions by Associates using their Florida Bar Licenses as guise to extort client Tavares. On June 23, 2006, Tavares purchases a condo unit at the Brickell Key Condominium, at 520 Brickell Key Drive, Unit 1511, Miami, Florida ("BK-1511"), with two loans provided by Impac Funding Corporation ("Impac"), with a combined loan amount of \$302,150. Tavares, is represented in the loans and closing, by his attorney Marco Emilio Rojas ("Rojas") (Florida Bar No. 940.453), and Rojas' assistant Frances G. Ortiz ("Ortiz"), at Freeman Haber Rojas & Stanham, LLP ("FHR&S"). Unknown at the time, by unsuspecting client Tavares, Tavares's attorneys at FHR&S are longtime serial criminals, systematically perpetrating, among other things, intercontinental money laundering of corruption and drug moneys,\* tax evasion and tax frauds, portfolio tax-free bond frauds, mortgage and bank frauds,\*\* tortious business interference with a business relationship, extortion of their own clients, and the subversion of the judicial machinery in Florida to further schemes, under color of law, and having the subverted courts to legalize the ill-gotten proceeds by successfully money laundering the moneys. See [Tavares Sworn Affidavit](#). The Impac loans are eventually bought by a Certain Certificate Holders of ISAC 2006-3, Mortgage Pass-Through Certificates, Series 2006-3, having Deutsche Bank National Trust Company as its Trustee. Then, the Criminal Enterprise, through the subverted Miami Courts, together with corrupt Judges, among others, Allan Lester Langer ("Judge Langer") (Florida Bar No. 137.828), and Norma S. Lindsey ("Judge Lindsey") (Florida Bar No. 994.812), systematically deprives and extorts Tavares, under color of law, in *Deutsche Bank Trust Company v. Charles Tavares* ("**Deutsche Bank**"), Case No. 2012-20197-CA-30. See Record.

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\* FHR&S's criminals Stephen A. Freeman ("Freeman") (Florida Bar No. 146.795), Robert M. Haber ("Haber") (Florida Bar No. 131.614), Neslon Slosbergas ("Slosbergas") (Florida Bar No. 378.887), Nicholas Stanham ("Stanham") (Florida Bar No. 38.822), and Rojas, in 2006, had already laundered billions of dollars of illicit sourced moneys, among others, more than \$461 million dollars of drug moneys for their Associate and drug Kingpin Fernando Zevallos Gonzales ("Zevallos Gonzales"), through FHR&S's Trust Accounts, and FHR&S's bank accounts at Banco Espirito Santo ("BES"), and, around 2006, because investigations on an upcoming indictment by the Federal Government of Zevallos Gonzales, criminal Freeman flees to Israel to hide from the law, while their schemes continue, returning years later to Florida, as their rackets grows as a Global Enterprise. See Record.

\*\* On October 12, 1994, criminals Freeman and Slosbergas at FHR&S a.k.a. Freeman, Newman & Butterman, as part of a scheme to defraud the United States of America, of, among other things, taxable income, perpetrate, among other things, a sham mortgage scheme, having Stephen A. Freeman and Nelson Slosbergas, as Trustees, and lenders of a \$2 million dollars sham loan ("\$2 million loan") to Joseph Horn ("Horn") and his wife, Lori Simon Horn a.k.a. Lory Y. Horn ("Lori"), for Horn & Lori's property at 330 Arvida Parkway, Coral Gables, Florida 33146, Folio No. 03-5105-002-0130 ("Horn's Gables Estate Property"), predicted on an artifice disguising the sham \$2 million loan, that in truth, and in fact, is Horn's own money, passing through Freeman and Slosbergas's Trust Account as an artifice to perpetrate the fraudulent loan charging interest on their own moneys in order to, among other things, to obtain improper deductible interest. The Horn's Gables Estate Property was previously purchased, on June 10, 1992, by Horn's H-Four Corp., a Florida corporation ("H-Four") (Tax Id. #65-0339924), for \$2,115,000, see CFN 1992R230242, and transferred, on October 12, 1994, from H-Four to Horn and Lori, for \$3,000,000, see CFN 1994R483674, with the sham \$2 million loan having Freeman and Slosbergas acting as lenders and attorneys for the transactions. On June 24, 2021, Horn and Lori, having attorney Michael J. Freeman ("Michael Freeman") (Florida No. 155.834), see, CFN 20210481091, or Book 32601 Pages 1989 – 1990. This scheme shows the Genesis of the global Criminal Enterprise and its *Omertà Code*, by FHR&S's criminals and Horn, which is related to one of Brazil's largest real estate builders, Cyrela Brazil Realty ("Cyrela"), later joined by BANIF Mortgage Corp USA, and BANIF Securities, Inc., Cayman Islands ("BANIF"), together with offsprings of ODEBRECHT Construction USA, and AHS Residential, LLC a.k.a. RESIA Residential, LLC ("RESIA"). See Record.

THE 2012 MARKOWITZ v. TAVARES'S MRPM v. BRIDGELOAN-BANIF SHAM CASE TO EXTORT TAVARES

As part of an underlying scheme by the Criminal Enterprise to deprive, steal, and extort Charles Tavares ("Tavares") of all properties and rights, under color of law, upon subverted court proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), on June 6, 2012, file, with unclean hands, a sham suit, *Markowitz Ringel Trusty & Hartog, P.A.* (Tax Id. #59-2325782), *Escrow Agent v. Miami River Park Marina, Inc., a Florida corp.* (Tax Id. #20-3168472), v. *BRIXRIV, LLC, a Florida L.L.C.* (No Tax Id.) ("**Markowitz**" case), Case No. 2012-20197-CA-22, causing Associates Ross R. Hartog ("Hartog") (Florida Bar No. 272.360), at Markowitz Davis Ringel & Trusty P.A. n.k.a. Markowitz Ringel Trusty & Hartog, P.A. ("Markowitz Trustee"), Bridgeloan Investors, Inc., a Florida corp. ("BRIDGELOAN") (Tax Id. # 65.0665516), BANIF Securities, Inc., ("BANIF"), and Matthew P. Leto ("Leto") (Florida Bar No. 14.504), to, knowingly and intentionally, systematically deprive, steal, and extort, under color of law, upon subverted proceedings before the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), Tavares, and Tavares's Company Miami River Park Marina, Inc., a Florida corporation ("Miami River Park Marina"). The Associates of the Criminal Enterprise, following the same *modus operandi* in the Related Cases, among others, in the, *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. BNY Mellon*, Case No. 2009-93058-CA-30; *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No. 2011-29624-CA-30; in *Geania A. Fraga v. Charles Tavares*, Case No. 2012-03573-FC-04; and, in *Geania A. Fraga v. Charles Tavares*, the double-jeopardy Case No. 2012-24483-FC-04, file false and contradictory pleadings, supported by false and fraudulent evidence, and false witnesses, upon subverted court proceedings, presided by corrupt judges Associates of the Criminal Enterprise systematically violating the law, Florida Rules of Civil Procedure, the constitution, and Tavares's rights to deprive, steal, and extort Tavares, under color of law. See [Tavares Sworn Affidavit](#). Hartog, on behalf of Markowitz Trustee, Plaintiff, and Leto on behalf of BRIXRIV, Defendant non-party to the matter, systematically deprive Tavares of due process and rights, intentionally and knowingly not serving the complaint, pleadings and notices of hearings upon Tavares, the sole legal authority for his company Defendant Miami River Park Marina, in order to extort and steal Tavares's Miami River Park Marina's Escrow Moneys that Tavares deposited with Markowitz Trustee in July 2005, while Markowitz Trustee's former partner and president, corrupt Judge Joseph I. Davis, Jr. ("Judge Davis Jr."), is concurrently and systematically extorting Tavares by presiding the two (02) fabricated sham Fraga cases. In December 2012, predicated on the systematic violation of laws, rules, the constitution, and Tavares's rights, the Criminal Enterprise successfully extorts and steals Tavares's Miami River Park Marina's Escrow Moneys\* held by Associates Markowitz Trustee to further the scheme. See Record.

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\* In July 2005, as part of an elaborate artifice in the scheme by the Criminal Enterprise's Associates, among others, criminals Thomas Ralph Lehman ("Lehman") (Florida Bar No. 351.318), and Marco Emilio Rojas ("Rojas") (Florida Bar No. 940.453), both representing unsuspecting client Tavares upon the United States Bankruptcy for the Southern District of Florida ("Bankruptcy Court"), in a case presided by Judge Robert A. Mark ("Judge Mark") (Florida Bar No.260.886), where Tavares is buying a certain 9 acres Miami River Property at 2051 N.W. 11 Street, Miami, Florida 33125 ("Marina Property") – one of two Properties later extorted from Tavares in the BRIDGELOAN Case, from Consolidated Yacht Corporation ("Consolidated") (Tax Id. #65-0242347), having Alan L. Goldberg ("Trustee Goldberg"), and Ross Robert Hartog ("Hartog") (Florida Bar No. 272.360) at Markowitz Trustee, as Consolidated's Registered Agent, see [www.sunbiz.org](http://www.sunbiz.org) ("SUNBIZ"), at Document #S28046, filed on May 16, 2005, Tavares deposits five hundred thousand dollars (\$500,000) into Markowitz Trustee's Account. On June 6, 2012, Hartog, and criminals at BRIDGELOAN, and Matthew P. Leto ("Leto") (Florida Bar No. 14.504), file, with unclean hands, as part of the scheme, a sham suit, *Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent v. BRIXRIV, LLC, and Miami River Park Marina, Inc.*, Case No.2012-21795-CA-22, successfully extorting & stealing, under color of law, the trust account's moneys. See Record.

THE OCTOBER 2012 FABRICATED FRAGA II DOMESTIC REPEAT VIOLENCE SHAM CASE v. TAVARES

On October 3, 2012, the Criminal Enterprise, following the dismissal, on July 11, 2012, of the previous fabricated sham FRAGA I case, see Case No. 2012-03753-FC-04, upon the subverted Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), showing an absolute disregard for the law, the constitution, and Tavares’s rights, file, with unclean hands, a second fabricated sham Domestic Repeat Violence Case against Charles Tavares (“Tavares”), the *Geania A. Fraga v. Charles Tavares* (the Double-Jeopardy “**FRAGA II**” case), Case No. 2012-24483-FC-04. The Fraga II sham case is filed through the same bad actor, Geania A. Fraga (“Fraga”), a Manager/Agent of BRIDGELOAN/ BANIF, by criminals Peter F. Valori’s (“Peter”) (Florida Bar No. 43.516), and Russell Marc Landy (“Landy”) (Florida Bar No. 44.417), Damian & Valori, LLP a.k.a. Damian Valori | Culmo (“Valori”), Gabriela Maranhao Machado Guimaraes (“Guimaraes”), and supported by false witnesses Martiza C. Calix (“Calix”), and Dunia Irene Pacheco (“Pacheco”), represented by implicated attorney Marcia Del Rey Garcia n.k.a. Judge Marcia Del Rey (“Judge Del Rey”) (Florida Bar No. 17.780). The subverted sham proceedings, is presided, again, by the same shameless corrupt Judge Joesph I. Davis Jr. (“Judge Davis Jr.”), a former partner and president (from 1980 through 2010) of Markowitz, Davis, Ringel & Trusty P.A. n.k.a. Markowitz Ringel Trusty & Hartog, P.A. (“Markowitz Trustee”), that systematically subverts the court proceedings to deprive and extort Tavares, under color of law, to further the criminal extortion of Tavares. See Case No. 2012-024483-FC-04, see also, [Tavares Sworn Affidavit](#). The Criminal Enterprise, with total contempt for the law, the constitution, and Tavares’s rights, systematically and repeatedly, subverts a court of law in the United States of America to further ongoing and continued racketeering schemes against, among others, the United States of America, the State of Florida, and citizen Tavares. The criminals, on the FRAGA II – the Double-Jeopardy sham fabricated case against Tavares, make the same bogus fabricated allegations shown on FRAGA I, and now, claiming for the first time, desperately trying to incriminate and stop Tavares from exposing and fighting the Criminal Enterprise, that, among other things, Tavares, in March 2006, kidnaped Fraga, and drove around pointing a gun to Fraga, and threatening to kill Fraga. See Fraga II Double-Jeopardy Case, Initial Petition at page 2 ¶¶ b, c, and d. After, among other things, the record shows five (05) law firms representing Tavares are intimidated, coerced, and extorted by the Criminal Enterprise, and Tavares is forced to unduly spend more than \$100,000 in legal fees, and costs for the fabricated sham Domestic Repeat Violence Cases, causing Tavares and Tavares’s family to be deeply traumatized and harmed by the extortion in the fabricated sham FRAGA II case, showing that no law-abiding U.S. citizen is safe from the Criminal Enterprise’s subversion of the judicial and political machinery where they operate. On November 5, 2012, corrupt Judge David Jr. dismisses the legal farce *without prejudice*, leaving the doors of the subverted courts open to the Criminal Enterprise’s schemes extorting Tavares under color of law. Concurrently, the Criminal Enterprise continues their systematic ongoing\* criminal scheme depriving, stealing, extorting, and silencing, under color of law, Tavares of all properties and rights, so the Criminal Enterprise can continue their ongoing criminal rackets, freely and systematically depriving, stealing, and extorting the United States of America, the State of Florida, citizens, and companies, with absolute impunity. See Record.

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\* While corrupt Judge David Jr. is, knowingly and intentionally, depriving and extorting Tavares of rights in the two (02) fabricated sham legal farces, the Fraga I, and the Double-Jeopardy Fraga II cases, the Criminal Enterprise is, concurrently, and systematically, extorting and stealing all of Tavares’s properties and rights upon subverted proceedings in Related Cases in the Miami Courts. See [Tavares Sworn Affidavit](#).

THE 2013 TAVARES v. LEHMAN & LKLS+G CASE DEPRIVING AND EXTORTING TAVARES

On April 5, 2013, Charles Tavares (“Tavares”), after years of continued extortion, under color of law, of Tavares’s properties and rights, upon subverted proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), predicated on a sophisticated and systematic scheme\* by Associates of a Criminal Enterprise, among others, Tavares’s former attorneys, Thomas R. Lehman (“Lehman”) (Florida Bar No. 351.318), and Patrick J. Rengstl (“Rengstl”) (Florida Bar No. 581.631), at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), at R&S International Law Group, LLP (“R&S”), and Tavares’s reckless attorneys Larry A. Stumpf (“Stumpf”) (Florida Bar No. 280.526), and Jared M. Lopez (“Lopez”) (Florida Bar No. 103.616), at Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Tavares, files, Pro Se,\*\* a Legal Malpractice suit against Lehman & LKLS+G, the *Charles Tavares v. Thomas R. Lehman, Thomas R. Lehman, P.A. and Levine Kellogg Lehman Schneider + Grossman, LLP* (“**Lehman & LKLS+G**” suit), Case No. 2013-012223-CA-40, showing Legal Malpractice, Breach of Fiduciary Duty, and Fraud by Lehman and LKLS+G. On May 15, 2013, Tavares’s attorneys, Dale F. Webner (“Webner”) (Florida Bar No. 265.241), and Jamie Leigh Webner n.k.a. Jamie Leigh Katz (“Jamie”) (Florida Bar No. 105.634), file a notice of appearance, and Tavares’s Amended Complaint, followed by other pleadings. In September 2013, Lehman, LKLS+G, and their attorneys, among others, Robert M. Klein (“Klein”) (Florida Bar No. 230.022), and Richard M. Jones (“Jones”) (Florida Bar No. 059.097), at Klein Park & Lowe, P.A. (“Klein Park & Lowe”), after filing several sham pleadings containing hundreds of false and fraudulent statements to the Miami Courts that they know to be false and untrue, provides some limited discovery materials to Tavares, giving a glimpse of the massive fraud perpetrated by Lehman, LKLS+G, and Associates of the Criminal Enterprise in the BRIDGELoAN sham case, extorting \$50 million dollars from Tavares’s Companies. Shortly thereafter, Webner is extorted by Lehman, *et al.*, to coerce Tavares into accepting a sham \$5 million dollars settlement from Lehman & LKLS+G’s insurance company, requiring Tavares to sign a known false Affidavit. Tavares does not accept, and fires Webner. On April 15, 2014, Tavares’s attorney Richard J. Diaz (“Diaz”) (Florida Bar No. 767.697) files a notice of appearance, and shortly thereafter, is also successfully coerced by the Criminal Enterprise to resign, on September 2, 2014. See Record.

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\* The Criminal Enterprise’s scheme consists of, among other things, surrounding, for years, real estate investor, developer, and entrepreneur Tavares, by attorneys Associates of the Criminal Enterprise, to, knowingly and intentionally, systematically entrap the unsuspecting client Tavares, in, among other things, conflicted sham transactions and loans with other Associates of the Criminal Enterprise, Flick Mortgage Investors, Inc. (“Flick Mortgage”), and Bridgeloan Investors, Inc. (“BRIDGELoAN”), while secretly undermining Tavares’s businesses and deals with buyers and sellers, spreading false and malicious business information about Tavares and Tavares’s businesses to Tavares’s investors, partners, and the market, and fabricating multiple low bogus offers for Tavares’s properties in order to fraudulently undermine Tavares’s Properties’ value, and coercing and extorting Tavares’s investors and partners from any funding of the existing deals, fraudulently causing undue duress on Tavares’s businesses, until they cause a default, setting up the Criminal Enterprise’s ultimate scheme to deprive, steal, and extort Tavares of all properties and rights, under color of law, upon court proceedings subverted by the Criminal Enterprise, and having the subverted courts to money launder the ill-gotten proceeds from the extortion. See [Tavares Sworn Affidavit](#).

\*\* Tavares, since the Criminal Enterprise starts depriving and extorting Tavares, under color of law, with fabricated sham lawsuits predicated on, among other things, fraudulent evidence and false witnesses, upon subverted proceedings in the Miami Courts, Tavares goes through more than ten (10) law firms, spending over five hundred thousand dollars (\$500,000) in legal fees and costs, only to see Tavares’s attorneys being successfully intimidated, coerced, and extorted by the Criminal Enterprise, and unable to properly represent the client Tavares, and after several complaints to, *e.g.*, The Florida Bar, Florida’s Attorney General, the Florida Department of Law Enforcement, and to the Chief Judge of the Miami Courts, Tavares, without any training in law, is forced to file by himself the meritorious complaint against criminals Lehman & LKLS+G. See Record.

THE 2018 SHAM CASE 139TH AVENUE S.W. 8 STREET LLC v. TAVARES DEPRIVING & EXTORTING TAVARES

On August 30, 2018, after years of systematic tortious business interference with an advantageous business relationship, coercion, and extortion by Charles Tavares's ("Tavares") attorneys, among others, criminals\* Marco E. Rojas ("Rojas") (Florida Bar No. 940.453), Nicholas Stanham ("Stanham") (Florida Bar No. 38.822), Robert M. Haber ("Haber") (Florida Bar No. 131.614), Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), Garry Nelson ("Nelson") (Florida Bar No. 717.266), and other Associates of the Criminal Enterprise,\*\* as part of a sophisticated underlying scheme systematically depriving, stealing, and extorting the unsuspecting client Tavares of all properties and rights, under color of law, upon subverted proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), the criminals, file, with unclean hands, a sham suit predicated on fabricated \* \*\* fraudulent corporate authority for Tavares's Company 139TH Avenue S.W. 8 Street, LLC, a Florida LLC, ("139 TH") (Tax Id. #65-1202407), purported on behalf of the majority of 139 TH's shareholders, which they all know is false and fraudulent since Tavares, at all relevant times, is the sole legal authority of 139 TH, and Tavares also has a controlling fifty two percent (52%) interest\*\*\*\* on 139 TH, and Tavares did not authorize, nor authorized anyone to fabricate the false corporate resolutions on behalf of 139 TH. On a sham hearing, improperly noticed by Peter and Fernandez at Valori, in a date they all knew Tavares could not attend, reckless Judge Bronwyn C. Miller\*\*\*\*\* ("Judge Miller") (Florida Bar No. 119.441), enters an invalid order depriving and extorting, under color of law, Tavares of properties and rights. In January 2019, to further the scheme, corrupt Judge Carlos M. Guzman ("Judge Guzman") (Florida Bar No. 115.990) is assigned to the case, systematically violating the law, constitution, rules of procedure, and Tavares's rights. On May 29, 2019, corrupt Judge Guzman enters an invalid final order, contradicting the truth, the facts, the evidence, and the law, legalizing the extortion of Tavares, so the criminals secretly sell, on May 3, 2022, Tavares's 139 TH 29 acres property for \$15,125,000. See Record.

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\* The criminals, among others, Rojas, Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/17/1965, in Brazil), Peter F. Valori ("Peter") (Florida Bar No. 43.516), and Amanda Lara Fernandez ("Fernandez") (Florida Bar No. 106.931), at Damian & Valori, LLP a.k.a. Damian Valori | Culmo Law ("Valori"), and Steven C. Cronig ("Cronig") (Florida Bar No. 307.068 & New York Bar No. 4.977.419), at Hinshaw & Culbertson, LLP ("Hinshaw"), for years, systematically sabotage deals with buyers, e.g., Lowe's Home Companies, Inc., ("Lowe's Home Improvement"), concurrently coercing and extorting Tavares, and Tavares's partners in 139 TH, spreading false rumors about Tavares and 139 TH's properties, and fabricating bogus offers from, e.g., AHS Residential, LLC n.k.a. RESIA, LLC, a.k.a. MRV Engenharia e Participações S.A. ("RESIA" or "MRV") to undermine and devalue the properties, so they can extort and steal Tavares's Company and properties. See [Tavares Sworn Affidavit](#) at ¶¶ 43 – 89.

\*\* The Criminal Enterprise uses, among other Associates implicated, Rojas, Stanham, Slosbergas, Haber, Nelson, Peter at Valori, Cronig at Hinshaw, Hugo Barreto Del Priore ("Del Priore") and Marco Antonio de Souza (De Souza") at BANIF Securities ("BANIF"), Francisco Ruiz ("Ruiz"), Ernesto Pereira Lopes ("Lopes"), Rubens Menin Teixeira de Souza ("Rubens Menin"), Joao Vitor Nazareth Menin Teixerira de Souza (Joao Vitor Menin") at RESIA/MRV, and Wolters Kluwer a.k.a. CT Corporation System ("Wolters Kluwer"), and attorneys Michael Cosculluela ("Cosculluela") (Florida Bar No. 189.480), and Daniel J. Marzano (Marzano") (Florida Bar No. 189.804), at Cosculluela & Marzano, P.A, together with bad actors in the Republic of Panama. *Id.*

\*\*\* The Criminal Enterprise uses the same *modus operandi*, e.g., having criminals Slosbergas, Rojas, Peter at Valori, and Guimaraes, fabricating fraudulent corporate resolutions of March 16 and 18, 2018, for Tavares's Company 139 TH, purportedly signed by a person in the Republic of Panama that did not – and could not have any authority of 139 TH, as Tavares is the sole authority, using fraudulent resolutions as a predicate to falsely remove Tavares from Tavares's Company 139 TH, furthering the extortion upon the subverted Miami Courts, already depriving and extorting Tavares of all properties, under color of law. *Id.*

\*\*\*\* Since August 18, 2013, Tavares became the sole controlling majority shareholder with a 52% interest. *Id.* at ¶ 44.

\*\*\*\*\* Reckless Judge Miller, like corrupt Judge Norma S. Lindsey ("Judge Lindsey") (Florida Bar No. 994.812), shortly after the sham order, showing the *Omertà Code*, is nominated to the Third District Court of Appeal by Florida Governor Rick Scott. *Id.*

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
11	<b>June 6, 2012</b>	<b><u>U. S. CODE TITLE 18</u></b>	Markowitz Trusty Ringel Hartog Ross Robert Hartog BRIXRIV, LLC Bridgeloan Investors, Inc. Joseph H. Horn Ralph Horn Ricardo Eichenwald Fernando Braghin BANIF Brickell, LLC Marco Antonio de Souza Pedro Serzedelo Jorge C. Pais Raul Marques Hugo Barreto Del Priore NS Corporate Services, Inc. Nelson Slosbergas Hall, Hall & Leto Matthew Paul Leto LKLSG, LLP Thomas Ralph Lehman FBT Avocats SA Olten Ayres de Abreu Jr. The Continued Criminal Enterprise
12		§ 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights Under Color of Law & § 1346 Scheme/Artifice to Defraud Honest Services & § 1349 Conspiracy to Commit Mail & Wire Fraud & § 1961 <i>et seq.</i> – RICO &	
13			
14			
15			
16			
17		<b><u>FLORIDA STATUTES</u></b> TITLE XLVI § 837.02 Perjury in Official Proceedings &	
18		<b>COMMON LAW – ABUSE OF PROCESS</b> & <b>FLORIDA BAR RULES OF CONDUCT</b> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On June 6, 2012, attorney Ross Robert Hartog (“Hartog”) (Florida Bar No. 272.360) at Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent f.k.a. Markowitz, Davis, Ringel & Trusty, P.A. (“Markowitz Trustee”), following orders from the Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”) to further the schemes systematically subverting the courts to steal, deprive and extort Tavares of properties and rights, files, with unclean hands, a vague and contradictory Complaint for Interpleader before the Miami Courts, against Tavares’s Miami River Park Marina, Inc., a Florida corporation (“MRPM”), and BRIXRIV, LLC, a Florida L.L.C (“BRIXRIV”), a non-party to the matter. *See Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent v. BRIXRIV, LLC, and Miami River Park Marina, Inc.*, sham Case No. 2012-21795-CA-22. Markowitz Trustee, and its attorneys, as officers of the courts, furthering<sup>5</sup> the criminal scheme upon the courts, knowingly and intentionally, repeatedly mislead the court by falsely stating that BRIXRIV, LLC owns Tavares’s MRPM’s former property at 2051 N.W. 11 Street, Miami, Florida 33125 (the “Marina Property”), extorted by the CCE in an invalid and fraudulent settlement in the sham Related Case *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. BNY Mellon*, Case No. 2009-93058-CA-30, contradicting the truth and public records, and, that, Markowitz Trustee, and other Perpetrators implicated know that is false. See Miami-Dade County Property Appraiser’s Record.

<sup>5</sup> The Criminal Enterprise’s “*Omertà Code*” requires Associates to commit at least two brazen violations of law in order to, among other things, show their loyalty to the Criminal Enterprise, and to make sure these Associates can be blackmailed by the Criminal Enterprise in case they decide in the future to betray the Criminal Enterprise, as the record displayed clearly shows them, knowingly and intentionally, repeatedly violating the law upon the sham proceedings to further the continued criminal scheme depriving, stealing, and extorting Tavares. See [Tavares’ Sworn Affidavit of 11/27/2022 at 4 subpar. 5.](#)

## COUNTS

**Count 11-** The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

**Count 12-** The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.,* U.S. Const., Amend. XIV.

**Count 13-** Hartog, Markowitz Trustee, Lehman, and other officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

**Count 14-** The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

**Count 15 -** The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to implement their criminal scheme to defraud the United States of America, the State of Florida, and Tavares, by using, *e.g.,* interstate communications and wires to further the criminal scheme, in violation of 18 U.S.C. §1349.

**Count 16 -** At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.,* the Record filed in this matter, and [Tavares Sworn Affidavit](#).

**Count 17(a)-** Perjury in Official Proceeding by Hartog, and Markowitz Trustee, to further the scheme by knowingly and intentionally, falsely stating under oath, as officers of the courts, that “BRXRIV, LLC owns the Marina Property” in order to, among other things, falsely mislead the court, and others, that BRXRIV has an interest in the Escrow Moneys held by Markowitz Trustee, in violation of, §837.02, F.S. (Perjury in Official Proceeding), *See* Record.



**Count 17(b)-** Perjury in Official Proceeding by Hartog, and Markowitz Trustee, to further the scheme by knowingly and intentionally, falsely stating under oath that the allegations in their petition are true and correct, in violation of, §837.02, F.S. (Perjury in Official Proceeding), while knowingly and intentionally, falsely stating, among other things, that “BRIXRIV, LLC owns the Marina Property. See Record.

**Count 18** – Hartog, Markowitz Trustee’s attorneys, and other officers of the courts implicated, among others, Hall, Hall & Leto, and Leto, knowingly and intentionally, to further the Criminal Enterprise’s brazen criminal scheme subverting courts of law to steal, deprive and extort Tavares and his companies, willfully use, as officers of the courts, the judicial machinery to file with the courts, sham contradictory motions, pleadings, and notices, in violation of, Abuse of Process, Common Law.

**Count 19** – Hartog, and other Markowitz Trustee’s attorneys, officers of the court, knowingly and intentionally use their Florida Bar licenses as guise to commit crimes, willfully participating in the brazen and known criminal scheme, systematically making patently false statements in writing to mislead the Miami Court to falsely incriminate, steal, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.02, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar Oath, and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT, stating; “A lawyer shall not: **(a)** violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through acts of another; **(b)** commit a criminal act that reflects adversely on the lawyer’s honesty, trustworthiness, or fitness as a lawyer in other respects; **(c)** engage in conduct involving dishonesty, fraud, deceit, or misrepresentation, except that it shall not be professional misconduct for a lawyer for a criminal law enforcement agency or regulatory agency to advise others about or to supervise another in an undercover investigation, unless prohibited by law or rule, and it shall not be professional misconduct for a lawyer employed in a capacity other than as a lawyer by a criminal law enforcement agency or regulatory agency to participate in an undercover investigation, unless prohibited by law; **(d)** engage in conduct in connection with the practice of law that is prejudicial to the administration of justice, including to knowingly, or though callous indifference, disparage, humiliate, or discriminate against litigants, jurors, witnesses, court personnel, or other lawyers on any basis, including but not limited to , on account of race, ethnicity, gender, religion, national origin, disability, marital status, sexual orientation, age, socioeconomic status, employment, or physical characteristic;” See The Florida Bar Rules of Professional Conduct, Rule 4-8.4 (a)(b)(c)(d) at [www.floridabar.org](http://www.floridabar.org).

**COUNTS      APROX. DATE                      VIOLATIONS                      PERPETRATORS**

20	<b>August 28, 2012</b>	<b><u>U. S. CODE TITLE 18</u></b>  § 1341 Mail Fraud	Hall Hall & Leto Matthew Paul Leto The Continued Criminal Enterprise
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On or about August 28, 2012, Associate Matthew Paul Leto (“Leto”) (Florida Bar No. 14.504) at Hall, Lamb, Hall, P.A., a.k.a. Hall, Hall & Leto, P.A. (“Hall & Leto”), knowingly and intentionally, submits, via U.S. Mail, to further the scheme<sup>6</sup> by the Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”) subverting Florida courts to steal, deprive and extort Charles Tavares (“Tavares”) of rights and all properties upon sham proceedings, a “Notice to Opposing Party as to Service of Pleadings Via E-Mail” (“Notice”) (Hall, Hall & Leto’s Filing Reference #10297/00268506.1), in the case, *Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent, Plaintiff, v. BRIXRIV, LLC and Miami River Park Marina, Inc., Defendants*, Case No. 2012-21795-CA-22, to: *Ross Hartog, Esq., Markowitz, Ringel, Trusty & Hartog, P.A.* (the “Markowitz Trustee” sham case), at 9130 South Dadeland Boulevard, Suite 1800, Miami, Florida 33156. The Notice states Hall & Leto’s E-Mail addresses for service on the sham proceedings as:

1. Matthew P. Leto, Esq. MLeto@hlhlawfirm.com
  2. Yamilette Perez YPerez@hlhlawfirm.com
  3. Law Firm Mailbox Pleadings@h2attorneys.com
- See Docket, at Case No.2012-21795-CA-22.

**COUNTS**

**Count 20-** Hall & Leto, Leto, and other Perpetrators implicated, to further their criminal scheme subverting Florida courts to steal, deprive and extort Tavares of rights and all properties upon sham proceedings, knowingly and intentionally, submits certain Notice to Opposing Party as to Service of Pleadings, via U.S. Mail, on August 28, 2012 for the purpose of executing their scheme, in violation of 18 U.S.C. §1341.

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<sup>6</sup> Leto, and other Hall & Leto’s attorneys implicated in the BRIDGELOAN criminal scheme since 2009, know in truth and in fact, that, among other things, BRIXRIV, LLC, a Florida limited liability company (“BRIXRIV”) is not the owner of the Miami River Marina Property, and BRIXRIV does not have an interest on Tavares’s Miami River Park Marina, Inc., a Florida Corporation’s (“MRPM”) Escrowed Moneys, showing another brazen scheme to continue freely subverting courts of law in the United States of America, to further shocking schemes stealing, depriving and extortion Tavares and his companies of all properties and rights, upon courts of law in Florida, depleting the victim of financial resources and time to fight back the Criminal Enterprise. Hall & Leto, and other Perpetrators implicated, knowingly and intentionally, deprive Tavares of rights and properties, by willfully not serving pleadings and notices on unsuspecting Defendant Charles Tavares’s Miami River Park Marina, Inc., and showing their consciousness of guilt by copying Tavares only on the recordable fraudulent Final Judgment Order of December 19, 2012, drafted by Leto, and Hall & Leto, see Hall & Leto’s Draft Order at Document # 10297/00292160.1, after successfully stealing the Escrowed Moneys. See Docket, at Case No.2012-21795-CA-22, and, see also Tavares Sworn Affidavit.

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
21	<b>October 10, 2012</b>	<b><u>U. S. CODE TITLE 18</u></b>	Markowitz Trusty Ringel Hartog Ross Robert Hartog BRIXRIV, LLC Bridgeloan Investors, Inc. Joseph H. Horn Ralph Horn Ricardo Eichenwald Fernando Braghin BANIF Brickell, LLC Marco Antonio de Souza Pedro Serzedelo Jorge C. Pais Raul Marques Hugo Barreto Del Priore NS Corporate Services, Inc. Nelson Slosbergas Hall, Hall & Leto Matthew Paul Leto LKLSG, LLP Thomas Ralph Lehman FBT Avocats SA Olten Ayres de Abreu Jr. The Continued Criminal Enterprise
22		§ 371 Conspiracy to Defraud the United States of America &	
23		§ 241 Conspiracy Against Rights &	
24		§ 242 Deprivation of Rights Under Color of Law &	
25		§ 1346 Scheme/Artifice to Defraud Honest Services &	
26		§ 1341 Mail Fraud &	
27		§ 1961 <i>et seq.</i> – RICO & <b><u>FLORIDA STATUTES</u></b> TITLE XLVI § 837.02 Perjury in Official Proceedings &	
28		<b>COMMONS LAW</b> – ABUSE OF PROCESS &	
29		<b>FLORIDA BAR RULES OF CONDUCT</b> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On October 10, 2012,<sup>7</sup> attorney Ross Robert Hartog (“Hartog”) (Florida Bar No. 272.360) at Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent f.k.a. Markowitz, Davis, Ringel & Trusty, P.A. (“Markowitz Trustee”), following orders from the Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”) to further schemes systematically subverting courts of law in Florida, to steal, deprive and extort Tavares of all properties and rights, files, with unclean hands, a vague and contradictory Amended Complaint for Interpleader (“Amended Complaint”) to further the scheme. Among other things, Hartog and Markowitz Trustee’s vague, false, and contradictory Amended Complaint, knowingly and intentionally states, to mislead the court and other interested parties, that: *“Brixriv is not a party to the Remediation Agreement and has no obligation to remediate environmental contamination on the Property. However, Brixriv owns the Property and is desirous of completing its environmental remediation and therefore claims an interest in the Escrow.”* See Markowitz Trustee’s Amended Complaint at 3 ¶ 12. Hartog and Markowitz knew at all relevant times that BRIXRIV, LLC, a Florida L.L.C, one of their named Defendants in the sham complaint was never an owner of the subject property, the Miami River Marina Property located at 2051 N.W. 11 Street, Miami, Florida 33145, and was not, and could not have been “an interested party” to the escrowed moneys (at the time \$108,295.15, see *Id.* at 4 ¶ 15). At all relevant times, Hartog, Markowitz Trustee, and other implicated Perpetrators knew, and had to know, that they were, knowingly and intentionally subverting a court of law to further the scheme stealing, depriving, and extorting Tavares and his companies of all properties and rights. Markowitz Trustee’s false and contradictory statements to the court shows the CCE’s *“Omertà Code.”* See [Tavares Sworn Affidavit](#).

## COUNTS

**Count 21** - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

**Count 22**- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

**Count 23**- Hartog, Markowitz Trustee, and other officers of the courts implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

**Count 24**- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

**Count 25**- Hartog, Markowitz Trustee, and other Perpetrators implicated, to further their criminal scheme subverting Florida courts to steal, deprive and extort Tavares of rights and properties upon sham proceedings, knowingly and intentionally, use U.S. Mail of false documents, for the purpose of executing their scheme, in violation of 18 U.S.C. §1341.

**Count 26**- At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

**Count 27**- Perjury in Official Proceeding by Hartog, and Markowitz Trustee, to further the scheme by knowingly and intentionally, falsely stating under oath, as officers of the courts, that “BRXRIV, LLC owns the Marina Property” in order to, among other things, falsely mislead the court, and others, that BRXRIV has an interest in the Escrow Moneys held by Markowitz Trustee, to steal, deprive and extort rights and escrowed moneys, in violation of, §837.02, F.S. (Perjury in Official Proceeding), *See* Record.

**Count 28** – Hartog, and other Markowitz Trustee’s attorneys, officers of the court, knowingly and intentionally use their Florida Bar licenses as guise to commit crimes, willfully subverting courts of law, and repeatedly filing patently false and contradictory complaints and amended complaints to steal, deprive and extort Tavares and his company Miami River Park Marina, Inc., a Florida Corporation, to further the brazen schemes upon courts of law, in violation of, Abuse of Process, Common Law.

**Count 29**– Hartog, and other Markowitz Trustee’s attorneys, officers of the court, knowingly and intentionally use their Florida Bar licenses as guise to commit crimes, willfully participating in the brazen and known criminal scheme, systematically making patently false statements in writing to mislead the Miami Court to falsely incriminate, steal, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.02, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT, stating; “A lawyer shall not: **(a)** violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through acts of another; **(b)** commit a criminal act that reflects adversely on the lawyer’s honesty, trustworthiness, or fitness as a lawyer in other respects; **(c)** engage in conduct involving dishonesty, fraud, deceit, or misrepresentation, except that it shall not be professional misconduct for a lawyer for a criminal law enforcement agency or regulatory agency to advise others about or to supervise another in an undercover investigation, unless prohibited by law or rule, and it shall not be professional misconduct for a lawyer employed in a capacity other than as a lawyer by a criminal law enforcement agency or regulatory agency to participate in an undercover investigation, unless prohibited by law; **(d)** engage in conduct in connection with the practice of law that is prejudicial to the administration of justice, including to knowingly, or though callous indifference, disparage, humiliate, or discriminate against litigants, jurors, witnesses, court personnel, or other lawyers on any basis, including but not limited to , on account of race, ethnicity, gender, religion, national origin, disability, marital status, sexual orientation, age, socioeconomic status, employment, or physical characteristic;” See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4 (a)(b)(c)(d) at [www.floridabar.org](http://www.floridabar.org).

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<sup>7</sup> The Amended Complaint by Markowitz Trustee, is dated and signed by Hartog as been U.S. Post Mailed, and filed on October 10, 2012, but the Docket in the case shows a filing date of October 15, 2012. See Docket on Case No. 2012-21795-CA-22. Because Markowitz Trustee, Hall & Leto, and other Perpetrators implicated did knowingly and intentionally deprived, under color of law, Tavares of, among other things, service of complaint and amended complaint, motions, and notices of hearings, the court documents Tavares is able to access were limited, further showing their intent to deprive and obstruct justice in the sham proceedings to cover up the brazen successful scheme upon the courts. *Id.*

**COUNTS      APROX. DATE                      VIOLATIONS                      PERPETRATORS**

30	<b>November 29, 2012</b>	<b><u>U. S. CODE TITLE 18</u></b> § 371 Conspiracy to Defraud the United States of America	Hall, Hall & Leto Matthew Paul Leto BRIXRIV, LLC
31		& § 241 Conspiracy Against Rights	Bridgeloan Investors, Inc. Joseph H. Horn
32		& § 242 Deprivation of Rights Under Color of Law	Ralph Horn Ricardo Eichenwald Fernando Braghin
33		& § 1346 Scheme/Artifice to Defraud Honest Services	BANIF Brickell, LLC Marco Antonio de Souza Pedro Serzedelo Jorge C. Pais Raul Marques Hugo Barreto Del Priore NS Corporate Services, Inc. Nelson Slosbergas Markowitz Trusty Ringel Hartog Ross Robert Hartog LKLSG, LLP Thomas Ralph Lehman FBT Avocats SA Olten Ayres de Abreu Jr. The Continued Criminal Enterprise

On or about November 29, 2012, the Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”), by, among other Perpetrators implicated, Associate Mathew Paul Leto (“Leto”) (Florida Bar No. 14.504) at Hall, Lamb, Hall, P.A., a.k.a. Hall, Hall & Leto, P.A. (“Hall & Leto”), Ross Robert Hartog (“Hartog”) (Florida Bar No. 272.360) at Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent f.k.a. Markowitz, Davis, Ringel & Trusty, P.A. (“Markowitz Trustee”), successfully subverting the courts, cause presiding Judge Darrin Phillip Gayles (“Judge Gayles”) (Florida Bar No.992.630), to enter, predicated on repeated false and misleading<sup>8</sup> pleadings and claims by Hartog, Markowitz Trustee, Leto, and Hall & Leto, a sham Default Judgment against Tavares’ MRPM, to knowingly and intentionally, further the underlying criminal scheme depriving, stealing, and extorting Tavares of all properties and rights, upon subverted proceedings in courts of law in Florida. See Default Order, at Docket, *Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent v. BRIXRIV, LLC, and Miami River Park Marina, Inc.*, Case No. 2012-21795-CA-22, Miami Court.

<sup>8</sup> In addition to the patently false and contradictory statements to knowingly and intentionally mislead the Miami Courts, that BRIXRIV, LLC is the owner of the Miami River Marina Property, located at 2051 N.W. 11th Street, Miami, Florida, 33145, for which Markowitz Trustee holds the escrowed moneys claimed by the Criminal Enterprise, and the fact shown on the record that Tavares, as his company’s Miami River Park Marina, Inc., a Florida Corporation (“MRPM”) sole President, Manager, and Registered was never, as part of the scheme, served the complaint, amended complaint, pleadings, and notices of hearings, states to the Miami Court, that, Markowitz Trustee attempted service upon Tavares by a certain Process Service company, Professional Process Service, LLC, a Florida L.L.C. (Tax Id. #264489669) (SUNBIZ Document #L09000017530), managed by Robert L. Markowitz (“Server Markowitz”). *Id.*

## COUNTS

**Count 30** - Hartog, Markowitz Trustee, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

**Count 31**- Hartog, Markowitz Trustee, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

**Count 32**- Hartog, Markowitz Trustee, and other Perpetrators implicated, officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

**Count 33**- Hartog, Markowitz Trustee, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

**COUNTS      APROX. DATE      VIOLATIONS      PERPETRATORS**

<b>COUNTS</b>	<b>APROX. DATE</b>	<b>VIOLATIONS</b>	<b>PERPETRATORS</b>
34	<b>December 5, 2012</b>	<b><u>U. S. CODE TITLE 18</u></b> § 371 Conspiracy to Defraud the United States of America &	Hall, Hall & Leto Matthew Paul Leto BRIXRIV, LLC Bridgeloan Investors, Inc.
35		§ 241 Conspiracy Against Rights &	Joseph H. Horn Ralph Horn
36		§ 242 Deprivation of Rights Under Color of Law &	Ricardo Eichenwald Fernando Braghin BANIF Brickell, LLC
37		§ 1346 Scheme/Artifice to Defraud Honest Services &	Marco Antonio de Souza Pedro Serzedelo Jorge C. Pais
38		<b>FLORIDA BAR RULES OF CONDUCT</b> Misconduct –Dishonesty-Fraud-Deceit Rule 4-8.4 (a)(b)(c)(d)	Raul Marques Hugo Barreto Del Priore NS Corporate Services, Inc. Nelson Slosbergas Markowitz Trusty Ringel Hartog Ross Hartog LKLSG, LLP Thomas Ralph Lehman FBT Avocats SA Olten Ayres de Abreu Jr. The Continued Criminal Enterprise

On or about December 5, 2012, as part of the criminal scheme by a Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”), subverting Florida courts, Associate Mathew Paul Leto (“Leto”) (Florida Bar No. 14.504) at Hall, Lamb, Hall, P.A., a.k.a. Hall, Hall & Leto, P.A. (“Hall & Leto”), files, with unclean hands, on behalf of BRIXRIV, LLC, a Florida L.L.C. (“BRIXRIV”), sham pleadings, Defendant’s Motion for Entry of Final Judgment (“Hall & Leto Document Ref. #10297/00290115.1), knowingly and intentionally, falsely stating to mislead the Miami Court that, among other things, “*Defendant BRIXRIV purchased the property*” – the subject Miami River Marina Property at 2051 N.W. 11th Street, Miami, Florida 33145, for which Charles Tavares (“Tavares”) deposited the escrowed moneys held by Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent f.k.a. Markowitz, Davis, Ringel & Trusty, P.A. (“Markowitz Trustee”). See Defendant’s Motion for Entry of Final Judgment at ¶ 4, Case No. 2012-21795-CA-22, Miami Courts. BRIXRIV, as such, “then claimed an interest in the escrow fund held by Plaintiff [Markowitz Trustee], which led to the filing of this case.” *Id.* at 5. Leto, Markowitz Trustee, BRIXRIV, and other Perpetrators implicated, all knew in truth and in fact that these statements to the Miami Courts are false, contradictory, and fraudulent, and is an artifice to further the scheme depriving, stealing, and extorting Tavares of all properties and rights, under color of law, following Tavares’ uncovering and exposing the CCE’s first sham Related Case, depriving, stealing, and extorting, under color of law, Tavares of \$50 million dollars. See *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. BNY Mellon*, Case No. 2009-93058-CA-30. Leto, and Hall & Leto’s Defendant’s Motion for Entry of Final Judgment on behalf of BRIXRIV is set by the Perpetrators implicated in the scheme, for a sham hearing on December 19, 2012 at 9:30 a.m., to legalize the CCE’s schemes upon the court. See Notice.



## COUNTS

**Count 34** - Leto, and Hall & Leto, and other Perpetrators implicated, officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

**Count 35-** Leto, and Hall & Leto, and other Perpetrators implicated, officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.,* U.S. Const., Amend. XIV.

**Count 36-** Leto, and Hall & Leto, and other Perpetrators implicated, officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

**Count 37-** Leto, and Hall & Leto, and other Perpetrators implicated, officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

**Count 38–** Leto, and Hall & Leto, and other Perpetrators implicated, officers of the courts, officers of the court, knowingly and intentionally use their Florida Bar licenses as guise to commit crimes, willfully participating in the brazen and known criminal scheme, systematically making patently false statements in writing to mislead the Miami Court to falsely incriminate, steal, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.02, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. *See* [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4 (a)(b)(c)(d) at [www.floridabar.org](http://www.floridabar.org).

**COUNTS      APROX. DATE                      VIOLATIONS                                      PERPETRATORS**

39	<b>December 19, 2012</b>	<p align="center"><b><u>U. S. CODE TITLE 18</u></b>          § 371 Conspiracy to Defraud the United States of America          &amp;          § 241 Conspiracy Against Rights          &amp;          § 242 Deprivation of Rights Under Color of Law          &amp;          § 1346 Scheme/Artifice to Defraud Honest Services</p>	Markowitz Trusty Ringel Hartog Ross Hartog BRIXRIV, LLC Bridgeloan Investors, Inc. Joseph H. Horn Ralph Horn Ricardo Eichenwald Fernando Braghin BANIF Brickell, LLC Marco Antonio de Souza Pedro Serzedelo Jorge C. Pais Raul Marques Hugo Barreto Del Priore NS Corporate Services, Inc. Nelson Slosbergas Hall, Hall & Leto Matthew Paul Leto LKLSG, LLP Thomas Ralph Lehman FBT Avocats SA Olten Ayres de Abreu Jr. The Continued Criminal Enterprise
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On December 19, 2012, presiding Judge Darrin Phillip Gayles (“Judge Gayles”) (Florida Bar No.992.630), enters a sham order granting the Continued Criminal Enterprise’s (“Criminal Enterprise” or “CCE”) Non-Party to Charles Tavares’ (“Tavares”) Miami River Park Marina, Inc., a Florida Corporation’ (“MRPM”) Escrow Agreement with Markowitz, Davis, Ringel & Trusty, P.A. n.k.a. Markowitz, Ringel, Trusty & Hartog, P.A., Escrow Agent (“Markowitz Trustee”) , BRIXRIV, LLC, a Florida L.L.C. (“BRIXRIV”), the amount of \$100,866.09,<sup>9</sup> and that Markowitz Trustee paying themselves \$2,525.00 for their legal fees and costs, accounting for a total of \$103,391.09 of the stated amount on the Complaint and Amended Complaint of \$108,295.15, showing, again, the CCE’s modus operandi to systematically deprive, steal, and extort, among others, the United States of America, the State of Florida, U.S. citizens, and companies, of properties and rights, under color of law, upon subverted Florida courts. See Record. The Order, drafted by Hall & Leto (Document # 10297/00292160.1), states, among other things, that: *“Upon review of BrixRiv’s Unopposed Motion for Entry of Final Judgment and pursuant to the entry of default against Defendant Miami River Park Marina, Inc., IT IS ORDERED AND ADJUDGED that Plaintiff, Markowitz, Ringel, Trusty & Hartog, P.A.’s Complaint for declaratory relief is granted. The Court declares that (i) Defendant Brixriv is the rightful owner of the escrow funds at issue, (ii) Defendant Miami River Park Marina, Inc. has no rights to the escrow funds at issue, (iii) Plaintiff is relieved (released and discharged) of all duties and responsibilities (and liabilities) under the Remediation Agreement, and (iv) Plaintiff is entitled to its reasonable fees in costs incurred*

<sup>9</sup> Markowitz Trustee, on its sham and contradictory Complaint for Interpleader, and, on its Amended Complaint, to further the scheme, repeatedly states that they are holding \$108,295.15 in escrowed funds, see, e.g., Amended Complaint ¶ 15.

*In this litigation. Therefore, Plaintiff shall disburse \$2,525.00 of the funds held in escrow to Markowitz, Ringel, Trusty & Hartog, P.A. as its reasonable attorney's fees and costs. Plaintiff shall disburse the remaining \$100,866.09, plus any applicable interest, to Defendant, BrixRiv for let execution issue. Defendant Miami River Park Marina, Inc. shall take nothing by this action and go hence without day regarding any claims it has or could have asserted to the funds at issue in this action.*

*DONE AND ORDERED in Chambers, in Miami-Dade County, Florida, this December 19, 2012.*

/s/ Darrin P. Gayles

Judge Darrin P. Gayles

c.c.: Ross Hartog, Esq.

Matthew P. Leto, Esq.

Charles Tavares,[<sup>10</sup>] registered agent of Miami River [Park] Marina, Inc." See Final Order.

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<sup>10</sup> Hartog, Markowitz Trustee, Leto, Hall & Leto, and other Perpetrators implicated, during the legal farce upon the Miami Courts, knowingly and intentionally, systematically deprive Tavares of rights by not serving Tavares the complaint, amended complaint, motions, and notices of hearing, and only serving the fraudulent Final Judgment Order of December 19, 2012, after successfully defrauding the court to issue the fraudulent Final Judgment, as the record shows they, then, include Tavares as c.c. on the fraudulent order. See Record.

### COUNTS

**Count 39-** The Perpetrators implicated, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

**Count 40-** The Perpetrators implicated, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States -- that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. See, e.g., U.S. Const., Amend. XIV.

**Count 41-** The Perpetrators implicated, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

**Count 42-** The Perpetrators implicated, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

COUNTS      APROX. DATE                      VIOLATIONS                      PERPETRATORS

43	<b>From 2012 through 2014</b>	<b>U. S. CODE TITLE 18</b>	Miami Courts Chief Judge Administrative Judge Implicated Judges Miami Courts The Continued Criminal Enterprise
44		§ 371 Conspiracy to Defraud the United States of America & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights Under Color of Law & § 1346 Scheme/Artifice to Defraud Honest Services &	
45			
46			
47		<b>FLORIDA BAR RULES OF CONDUCT</b> Misconduct –Dishonesty-Fraud-Deceit Rule 4-8.4 (a)(b)(c)(d)	

From 2009, through 2021, the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), through, and by several of its corrupt Circuit Judges implicated in a brazen scheme, knowingly and intentionally, systematically deprives and extorts Charles Tavares (“Tavares”) of properties and rights, under color of law, upon subverted proceedings, to willfully further an underlying criminal scheme by the Criminal Enterprise, depriving, stealing, and extorting Tavares of all his properties and rights. The record displayed shows, to any reasonable person, that, among other things, from the first Related Case, *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. BNY Mellon*, Case No. 2009-93058-CA-30; the second case, *BNY Mellon v. Charles Tavares v. Flick Mortgage Investors, Inc.*, Case No. 2010-26864-CA-30; the third case, *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No. 29624-CA-30; the fourth case, *Geania A. Fraga v. Charles Tavares*, Case No. 2012-03753-FC-04; the fifth case, *Deutsche National Trust Bank v. Charles Tavares*, Case No. 20197-CA-30; the sixth case, *Markowitz Ringel Trusty & Hartog, Escrow Agent v. BRIXRIV, LLC v. Miami River Park Marina, Inc.* (a Tavares’s Company), Case No. 2012-21795-CA-22; the seventh case, *Geania A. Fraga v. Charles Tavares*, the Double-Jeopardy Case No. 2012-24483-FC-04; the eighth case, *Charles Tavares, et al. v. Thomas R. Lehman and Levine Kellogg Lehman Schneider + Grossman, LLP*, Case No. 2013-12223-CA-40; and to the ninth related case, *139TH Avenue S.W. 8TH Street, LLC v. Charles Tavares*, Case No. 2018-29700, Tavares is systematically deprived and extorted of rights and properties, under color of law, upon the subverted proceedings, willfully assigned, and presided by corrupt judges, Allan Lester Langer (Florida Bar No. 137.828), Joseph I. Davis Jr. (Florida Bar No. 155.299), Norma S. Lindsey (Florida Bar No. 994.812), and Carlos M. Guzman (Florida Bar No. 115990). The corrupt judges, knowingly and intentionally, allow and participate in the sham proceedings, often held without proper notice, to deny Tavares’s rights to due process, and predicated on brazen fabricated evidence and authority by Associates of the Criminal Enterprise, among others, Thomas R. Lehman (Florida Bar No. 351.318), Matthew P. Leto (Florida Bar No. 14.504), Peter F. Valori (Florida Bar No. 43.516), Russell M. Landy (Florida Bar No. 44.417), Marco E. Rojas (Florida Bar No. 940.453) Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and, Alan S. Fine (Florida Bar No. 385.824), coercing and extorting Tavares and Tavares’s attorneys, and further, willfully entering invalid and fraudulent final judgments against Tavares, contradicting the truth, the facts, and the law, to deprive and steal Tavares’s properties and rights. Despite the abundance of evidence filed by Tavares, and the record displayed demonstrating the scheme, showing a continued pattern of racketeering for more than ten (10) years, the Miami Courts,

by, among others, its Chief Judge Bertila A. Soto (Florida Bar No. 822.752), and Administrative Judge Jennifer D. Bailey (Florida Bar No. 386.758), knowingly and intentionally, fail to stop the continued schemes. Despite Tavares repeated complaints, supported by Sworn Affidavits and uncontroversial hard evidence showing the ongoing scheme, the Miami Courts continue allowing the extortion under color of law, showing the Miami Courts are implicated. See Record, and [Tavares Sworn Affidavit](#).

### **COUNTS**

**Count 43** - The Miami Courts, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

**Count 44** - The Miami Courts, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, allowed its known Members implicated in a Criminal Enterprise, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. See, U.S. Const., Amend. XIV.

**Count 45** - Miami Courts, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to, knowingly and intentionally, allow the systematically deprivation, under color of law, of Tavares rights and properties upon known sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

**Count 46** - The Miami Courts, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, knowingly and intentionally, allowing the systematic corruption and subversion of the judicial machinery by known Florida Bar licensed Members, to further known brazen criminal schemes upon courts of law in the United States of America, in violation of 18 U.S.C. §1346.

**Count 47** - The Miami Courts, and other implicated Judges, knowingly and intentionally use their Florida Bar licenses as guise to commit crimes, willfully failing their duties to stop the known brazen criminal scheme, by systematically failing to properly investigate and stop the known violations of law by Hartog, Markowitz Trustee, and other Florida Bar licensees implicated, and by further making false statements in writing in 2014, in order to cover up the scheme, depriving, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.02, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See The Florida Bar Rules of Conduct, Rule 4-8.4.

**COUNTS      APROX. DATE                      VIOLATIONS                                      PERPETRATORS**

48	<b>From 2011 through 2024</b>	<b><u>U. S. CODE TITLE 18</u></b>	The Florida Bar Joshua E. Doyle John F. Harkness The Board of Governors Fla. Bar Annemarie C. Craft Arlene Kalish Sankel
49		§ 371 Conspiracy to Defraud the United States of America &	
50		§ 241 Conspiracy Against Rights &	
51		§ 242 Deprivation of Rights Under Color of Law &	
52		§ 1346 Scheme/Artifice to Defraud Honest Services &	
53		§ 1341 Mail Fraud & <b>FLORIDA BAR RULES OF CONDUCT</b> Misconduct –Dishonesty-Fraud-Deceit Rule 4-8.4 (a)(b)(c)(d)	

From 2011, and continuing through 2024, The Florida Bar,<sup>11</sup> Executive Directors, and Discipline Division attorneys, (collectively “Florida Bar”), knowingly and intentionally, in reckless disregard for the law, the constitution, rights, Florida Rules of Civil Procedure, the Florida Bar’s constitutional mandate, and Rules of Professional Conduct, systematically deprived the United States, the State of Florida, Florida courts, the Florida Bar’s more than 122,000 members, and citizens, of, among other things, honest Services, by willfully, recklessly and systematically choosing not to enforce its mandate, by allowing and enabling reckless members of the Florida Bar, known Associates of a Criminal Enterprise, to continuously and systematically perpetrate, *e.g.*, violations of law, the constitution, rights, Fla. R. Civ. P., and Rules of Professional Conduct, to further rackets against, *e.g.*, Charles Tavares (“Tavares”), the United States, the State of Florida, Florida courts, and the Florida Bar, showing the Florida Bar’s reckless disregards for the law, the public, and its own rules and mandate. *See Record.* Despite Tavares’ repeated complaints<sup>12</sup> to the Florida Bar against Tavares’s attorneys and others implicated, using their Florida Bar licenses as guise to systematically commit crimes against Tavares, *et al.*, by, among other things, perpetrating, to further an underlying scheme to deprive, steal, and extort Tavares, and Tavares’s Companies of all properties and rights, under color of law in subverted proceedings, by spurious artifices, *e.g.*, extortion under color of law, fabrication of fraudulent Affidavits and bogus authority for Tavares’s Companies, filing fraudulent pleadings that they all knew to be false and invalid, making false statements under oath, stealing Tavares’s properties and proceeds, money laundering the ill-gotten proceeds across state lines, abuse of process, showing criminal misconduct, in violation of, *e.g.*, Title 18, U.S.C., Sections, 371, 241, 42, 1341, 1343, 1344, 1346, 1349, 1951, 1956, and, 1961, *et seq.*; Title XLVI § 817.155, TITLE XLVI § 837.02, Abuse of Profess, and Florida Bar Misconduct – Rule 4-8.4 (a)(b)(c)(d). *See Record.*

<sup>11</sup> Among some of the reckless officers of the Florida Bar, recklessly allowing and enabling Florida Bar licensees Associates of the Criminal Enterprise, Joshua E. Doyle (Florida Bar No. 25.902), John F. Harkness (Florida Bar No. 123.390), Annemarie C. Craft (Florida Bar No. 520.373), and, Arlene Kalish Sankel (Florida Bar No. 272.981). *See Tavares Sworn Affidavit.*

<sup>12</sup> Among other complaints, see, *e.g.*, Florida Bar Complaints: No.2011-71,18(III); No.2013-70,433(11G); No.2015-70,081(11L); No.2019-12874; No.2019-12875; and, 12877, against criminals Thomas R. Lehman (Florida Bar No. 351.318), Marco E. Rojas (Florida Bar No.940.453), Nelson Slosbergas (Florida Bar No.378.887), and, Peter F. Valori (Florida Bar No.43.516). *See Record.*

## **THE FLORIDA BAR – BACKGROUND**

The Florida Bar (“Florida Bar”) is the integrated<sup>13</sup> bar association for the State of Florida. The Florida Bar currently shows more than 122,000 members, and it is led by a President, a President-Elect, an Executive Director, and a 52-member Board of Governors.

Article V, Section 15 of the Constitution of the State of Florida gives the Supreme Court of Florida exclusive and ultimate authority to regulate the admission of persons to the practice of law and the discipline of those persons who are admitted to practice. The Court performs those official functions through two separate arms: the Florida Board of Bar Examiners, which screens, tests and certifies candidates for admission to the practice, and The Florida Bar, the investigative and prosecutorial authority in the lawyer regulatory process. Neither of these two agencies, nor any of their functions, is supported by state tax<sup>14</sup> dollars.

Its public mission statement is *“Regulate the practice of law in Florida; ensure the highest standards of legal professionalism in Florida; and protect the public by prosecuting unethical attorneys and preventing the unlicensed practice of law.”* See [www.floridabar.org](http://www.floridabar.org) Mission Statement on October 14, 2023; and;

**“The Florida Bar Regulates the Practice of Law in Florida The Florida Bar is charged by the Florida Supreme Court with lawyer regulation as its core function to protect the public and the integrity of the judicial system.” *Id.***

All Members of the Bar must take an Oath, and swear, as following:

“I do solemnly swear:

I will support the Constitution of the United States and the Constitution of the State of Florida; I will maintain the respect due to courts of justice and judicial officers; I will not counsel or maintain any suit or proceedings which shall appear to me to be unjust, nor any defense except such as I believe to be honestly debatable under the law of the land; I will employ for the purpose of maintaining the causes confided to me such means only as are consistent with truth and honor, and will never seek to mislead the judge or jury by any artifice or false statement of fact or law; I will maintain the confidence and preserve inviolate the secrets of my clients, and will accept no compensation in connection with their business except from them or with their knowledge and approval; To opposing parties and their counsel, I pledge fairness, integrity, and civility, not only in court, but also in all written and oral communications; I will abstain from all offensive personality and advance no fact prejudicial to the honor or reputation of a party or witness, unless required by the justice of the cause with which I am charged; I will never reject, from any consideration personal to myself, the cause of the defenseless or oppressed, or delay anyone’s cause for lucre or malice. So, help me God.”

The Record displayed on Charles Tavares’s Nine (09) Related Cases before the Miami Courts, shows, to any reasonable person, that, for more than ten (10) years, the Florida Bar, knowingly and intentionally, recklessly and systematically chose not to enforce its mandate, by willfully allowing and enabling reckless members of the Florida Bar, known Associates of a Criminal Enterprise, to continuously, and systematically perpetrate, among other things, violations of law, the constitution, rights, Florida Rules of Civil Procedure, and the Rules of Professional Conduct, to further rackets against, *e.g.*, Charles Tavares, the United States of America, the State of Florida, Florida courts, and the Florida Bar, showing the Florida Bar’s reckless disregards for the law, the public, and its own rules and mandate. See Record.

<sup>13</sup> See, [The 1949 Decision by the Supreme Court of Florida.](#)

<sup>14</sup> The Florida Bar, although not directly supported by “State or Federal Tax Dollars”, is a beneficiary of, *e.g.*, tax exemptions to pay State and Federal Tax Dollars under its claimed State and Federal tax-exempt status. At this time, Tavares has not found Federal or State Tax Records for The Florida Bar, but only for its affiliated entity, The Florida Bar Foundation, Inc, a Not For Profit Corporation (“Bar Foundation”) (Tax Id. #59-1004604) also, tax-exempt. See [www.sunbiz.org](http://www.sunbiz.org) at Document #702751.

## COUNTS

**Count 48** - The Florida Bar, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

**Count 49** - The Florida Bar, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, allowed its known Members implicated in a Criminal Enterprise, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See*, U.S. Const., Amend. XIV.

**Count 50** - The Florida Bar, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to, knowingly and intentionally, allow the systematic deprivation, under color of law, of Tavares rights and properties upon known sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

**Count 51** - The Florida Bar, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, knowingly and intentionally, allowing the systematic corruption and subversion of the judicial machinery by known Florida Bar licensed Members, to further known brazen criminal schemes upon courts of law in the United States of America, in violation of 18 U.S.C. §1346.

**Count 52** - The Florida Bar, and other Members of the Florida Bar implicated, to further their criminal scheme subverting Florida courts to steal, deprive, and extort Tavares of rights and properties, knowingly and intentionally, uses, in 2014, U.S. Mail for the purpose of executing their scheme, in violation of 18 U.S.C. §1341.

**Count 53** - The Florida Bar, and other Members of the Florida Bar implicated, knowingly and intentionally use their Florida Bar licenses as guise to commit crimes, willfully failing their duties to stop the known brazen criminal scheme, by systematically failing to properly investigate and stop the known violations of law by Hartog, Markowitz Trustee, and other Florida Bar licensees implicated, and by further making false statements in writing in 2014, in order to cover up the scheme, depriving, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.02, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. *See* The Florida Bar Rules of Conduct, Rule 4-8.4.



### **CONCLUSION**

The record displayed here, clearly shows that, the Criminal Enterprise has successfully subverted the judicial machinery in Florida, and elsewhere they operate, in order to further criminal schemes, depriving and extorting citizens and companies of properties and rights and then, “legalizing” these crimes, under color of law, and defrauding the United States of America of honest services in courts of law in the United States of America, undermining the rule of law and our democracy.

Only because Tavares is able to fight back the criminal schemes successfully depriving, stealing, and extorting Tavares of all his properties and rights, under color of law, for almost fifteen (15) years – and continuing to this date, that, we now can see how the Criminal Enterprise operates, corrupting major companies, bankers, officers of the courts, politicians, and willing partners, into criminal schemes, benefacting them all with the ill-gotten gains, causing irreparable damages to citizens, companies, the community, to the justice system, to the State of Florida, and to the United States of America, undermining the rule of law, and our democracy.

As such, we cannot allow these brazen known schemes and injustice to continue to erode the fabric of our society, subverting and corrupting all pillars of justice and democracy, by stopping this impunity now, and sending a clear and direct message to society that justice and the rule of law matters, before we become a total lawlessness “*Banana Republic*” society, where citizens do not believe or follow rules and laws because they see the injustice and impunity in the judicial machinery, the ultimate “*bastion*” of justice for citizens, and the systematic failure of responsible law enforcement to enforce the rule of law, protecting citizens, property, and rights from this known Criminal Enterprise, clearly presenting a danger to our society. See [Tavares Affidavit of 11/27/2022](#).

### **VERIFICATION**

Under penalties of perjury, I declare that I have read the foregoing and that the facts contained therein are true, except as to the matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

Dated: January 25, 2024

FURTHER AFFIANT SAYETH NAUGHT

/s/ Charles A. Tavares

Charles A. Tavares, a U.S. Citizen and Victim.