

## **AFFIDAVIT OF CHARLES A. TAVARES**

1. I, Charles A. Tavares ("Tavares"), a United States citizen, over the age of eighteen years old, base this affidavit on my personal knowledge and experience as a victim, as well as upon the review of relevant facts, documents and records gathered by me over the course of more than nineteen thousand hours of work and legal research, spanning for a period of more than twelve years, relating to a certain Transnational Continued Criminal Enterprise ("CCE" or "Enterprise"), comprised of my former reckless Miami attorneys together with other bad domestic and foreign associates, committing or causing to be committed, under color of law, more than one thousand three hundred and seventy violations of State and Federal Statutes upon sham civil proceedings upon corrupted and subverted Florida courts, in furtherance of, among other things, extortion and deprivation of my properties and rights, mail and wire honest service fraud, bank fraud, money laundering of proceeds derived from specified unlawful activity, including but not limited to the fraudulent transfer and sale of my properties and assets across state lines, and jurisdictions, systematically and continuously obstructing justice covering up the brazen schemes to prevent justice, systematically depriving the State of Florida and the United States of America of honest services upon courts of law, showing the successful systematic corruption and subversion of the judicial machinery in Florida, and elsewhere the Enterprise operates, continuously and ongoing, now, for more than twelve years. *See, [www.FBIknows.com](http://www.FBIknows.com).*

### **Introduction and Background**

2. I am a real estate developer, investor, manager, real estate broker, and entrepreneur. I first started working in a real estate project in Florida in 1992, along with real estate developer Eduardo Avila ("Avila"). Since that time, I have successfully developed, invested, managed, and transacted hundreds of very successful projects, deals and businesses, alone, and also with a selected number of wealthy qualified international investors.

3. I make this affidavit in support of my complaints and claims upon Florida courts and elsewhere, relating to the extortion of my properties and rights by the Enterprise.

4. In or about 1992, Avila first introduced me to work with a certain law firm located at Brickell Key, Miami, Florida, having attorneys Stephen Ames Freeman ("Freeman") (Florida Bar No.146795), Robert Michael Haber ("Haber") (Florida Bar No.131614), Nelson Slosbergas ("Slosbergas") (Florida Bar No.378887), Alan Samuel Fine ("Fine") (Florida Bar No. 385824), and in the following years, having Marco Emilio Rojas ("Rojas") (Florida Bar No.940453), and Nicholas Stanham ("Stanham") (Florida Bar No.38822), (herein referred also as "FHR&S" or "Tavares' attorneys," or by their individual names).

5. Tavares' attorneys, for a continuous period of approximately twenty years, represented Tavares personally, and Tavares' companies in hundreds of real estate deals and transactions, and because of this, and because Tavares' attorneys are licensed to practice law in Florida, Tavares, as a client, placed a great deal of trust in them during that time.

6. Unknown to Tavares at the time Tavares is a client, Tavares' attorneys are criminals<sup>1</sup> using their Florida Bar licenses as guise to commit major crimes, first starting in early 1990's, and continuing to this date, with tax schemes for bad domestic and foreign actors looking to money launder monetary instruments through the United States of America, then evolving into mortgage and portfolio tax-free bond fraud, global bank frauds, extortion of unsuspecting clients, and now, together with other powerful associates, successfully corrupting and subverting the judicial machinery in Florida and elsewhere, to further criminal schemes, and obstruct justice to cover up global criminal schemes threatening the rule of law and our national security.

7. Tavares' attorneys, and others known and unknown, being persons employed by, and associated with the Enterprise,<sup>2</sup> which have engaged since at least 1995 and continuing to the present, in Florida and elsewhere, in the activities of which affected interstate commerce, did knowingly and intentionally conspire with each other and others known and unknown to violate Title 18 United States Code, Section 1962(c), that is, to conduct and participate directly and indirectly, in the conduct and affairs of the enterprise through a pattern of racketeering activity, as the term is defined in 18 U.S.C. §§ 1961 (1) and 1961 (5), consisting of multiple acts indictable under 18 U.S.C. §§ 1343, 1346 (relating to honest services fraud); 18 U.S.C. § 1344 (bank fraud); 18 U.S.C. § 1951 (relating to interference with commerce and extortion); 18 U.S.C. § 1956 (relating to the laundering of monetary instruments); 18 U.S.C. § 1957 (relating to engaging in monetary transactions in property derived from specified unlawful activity); and multiple acts involving violation of rights under 42 U.S.C. 1985 (violation of rights). It was 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, all in violation of 18 U.S.C. § 1962(d). *See, e.g.*, E-Filings #47459529 on 10/11/2016, and #78979877 on 10/08/18.

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<sup>1</sup> See Criminal definition under Merriam-Webster Dictionary: "one who has committed a crime;" "of an illegal act for which someone can be punished by the government." *Id.* See also Some of the more than 1,370 violations of State and Federal Statutes by associates of the Criminal Enterprise at E-Filing #78629565.

<sup>2</sup> See 18 U.S.C.A. § 1961(4) (West 1984), stating, "An 'enterprise' is defined as including any individual, partnership, corporation, association, or other legal entity, and any union or group of individuals associated in fact although not a legal entity." See *United States v. Delano*, 825 F. Supp. 534, 538-39 (W.D.N.Y. 1993), *aff'd in part, rev'd in part*, 55 F. 3d 720 (2d Cir. 1995): See also 18 U.S.C.A. § 1961 (5) (West 1984), *H.J., Inc. v. Northwestern Bell Tel. Co.*, 492 U.S. 229, 239, 109 S. Ct. 2893, 2900, 106 L. Ed. 2d 195 (1989).

8. The Enterprise has now evolved into a powerful *Global Alliance*<sup>3</sup> of bad global actors implicated in, *e.g.*, intercontinental money laundering, global tax schemes, bank fraud, and extortion, using dark moneys to corrupt politicians and institutions, subverting the judicial system, and the rule of law in the United States of *America* and everywhere they operate.

**Overview of the Enterprise's Schemes upon Florida Courts Extorting and Depriving  
Tavares of Properties and Rights under Color of Law and Further Depriving the  
State of Florida and the United States of America of Honest Services upon Courts**

The Bridgeloan Bogus Case Scheme: Cases No.:2009-93058-CA-30 before the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Court"), and Appeal No. 3D16-2475 before the Third District Court of Appeal of Florida ("3DCA"), and the first fabricated bogus case before the Supreme Court of Florida, Case No.: SC18-435, see E-Filing #84430428 on 02/05/2019, fraudulently filed, docketed, and adjudicated by the 3DCA and the Florida Supreme Court to cover up schemes by the Enterprise and implicated judges using their licenses to commit crimes, under color of law, against Tavares, Florida, and the United States.

9. In or about 2005, Tavares' attorneys, FHR&S and criminal associate Thomas Ralph Lehman ("Lehman") (Florida Bar No.351318), in a secret conflicting representation, together with associates Joseph Horn ("Horn"), Ralph Horn ("Horn"), Ricardo Eichenwald ("Eichenwald"), Fernando Braghin ("Braghin"), and Slosbergas at Bridgeloan Investors, Inc., (Tax Id.#65-0665516) a/k/a/ Bridgeinvest, LLC (Tax Id.#45-3188071) (jointly "Bridgeloan"), and Mellon United National Bank, N.A. n/k/a The Bank of New York Mellon Corporation ("BNY Mellon"), as part of a scheme, willfully entrap Tavares in a \$7 million dollars loan-scheme, including escrow moneys for interest and taxes, to purchase a certain 9 acres Miami River property for \$13 million dollars, requiring Tavares to put down about \$7 million dollars cash and more than \$50 million dollars in properties as additional collateral. Tavares' attorneys FHR&S and Lehman represented Tavares personally and his companies Brickell Village One, LLC ("Brickell Village"), 2147 S.W. 8<sup>th</sup> Street, LLC ("2147"), IBAC Asset Holders, Inc. ("IBAC") and BV One Properties, Inc. ("BV") as borrowers, and Slosbergas, also a former Tavares' attorney, represents co-lender Bridgeloan, and Shutts & Bowen, LLP represents co-lender BNY Mellon. The attorneys close the loan in a date Tavares is out of the country, signing all loan documents. The attorneys and Bridgeloan, at all times, they all know that they are longtime associates and partners, and because they know the loan transaction is an artifice to extort Tavares of his properties, they never disclose their longtime close business and attorney/client relationship, in order to perpetrate their schemes.<sup>4</sup> See E-Filing #47458403 on 10/11/16.

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<sup>3</sup> The Enterprise is part of a network and *Global Alliance* of bad reckless law firms, financial actors and businesses, structuring and participating in global tax schemes, bank fraud, intercontinental money laundering of illicit monetary funds through the United States of America and offshore havens, and extortion of U.S. Citizens, further creating and using a "Shadow Exchange Market" to trade assets to evade law enforcement and taxes everywhere they operate.



10. In or about May, 2009, after years of continuous torts and interference by Tavares' attorneys and Bridgeloan, together with other associates, they successfully cause the Bridgeloan loan into default as part of their scheme to extort and deprive, under color of law, Tavares of all his properties and rights upon sham civil proceedings in Florida.

11. On or about December 24, 2009, to further the scheme, Bridgeloan files a contradictory and repugnant foreclosure complaint against Tavares and his companies, supported by a fraudulent financial affidavit of Bridgeloan in support of bogus contradictory and repugnant claims, shown on its face to be invalid and fraudulent, showing the Enterprise's *Omertà Code*.<sup>5</sup>

12. As part of the scheme to extort and deprive Tavares and his companies, under color of law, Tavares is initially represented by attorneys Lehman and Rojas, and having Slosbergas and Hall, Lamb and Hall, P.A. ("Hall"), representing Bridgeloan, and Alan Samuel Fine ("Fine" or now "Judge Fine") (Florida Bar No.385824), also a Tavares' former attorney and a former attorney at FHR&S representing Tavares' investor and Third-Party Defendant Romulo Pina Dantas ("Dantas"), which Fine is referred to Dantas by Rojas, and the co-lender BNY Mellon is represented by attorneys Erica Lee English ("English") (Florida Bar No.599328), and

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<sup>4</sup> In June 2004, the United States Department of the Treasury's Office of Foreign Assets Control ("OFAC") designated FHR&S's associate Fernando Melciades Zevallos Gonzales ("Zevallos Gonzales") a major drug kingpin, exposing FHR&S's systematically using their real estate trust accounts at Banco Espirito Santo, and registering companies, as well as fabricating bogus corporate documents using FHR&S's offices' janitors – cleaners, as Fake officers/agents, money laundering more than \$461 million dollars for associate Zevallos Gonzales. After that, the Enterprise moves some operations to the Republic of Panama to evade U.S. law enforcement, Freeman temporally flees the country. Because the reckless attorneys escape accountability for their criminal schemes, they evolve into a more powerful and sophisticated Global Enterprise, corrupting, for example, other reckless law firms, politicians, judges, and bankers, to further bigger frauds, including causing the collapse of BANIF Securities, Inc. (Cayman Islands), and BANIF Mortgage, Inc. (USA), (referred jointly with other related BANIF companies as "BANIF"), and associating with offshoots of bad actors in the ODEBRECHT corruption schemes, continuing evolving their global powers, posing a present and serious threat to the rule of law and democracy everywhere they operate in.

<sup>5</sup> The Enterprise's *Omertà Code* requires associates to commit at least two known brazen violations of law, e.g., Horn's two fraudulent sworn affidavits in the bogus Bridgeloan case against Tavares, the filings of sham pleadings by Bridgeloan's attorneys' Hall, Lamb and Leto, P.A. ("Hall"), the extortion and fraudulent representation of Tavares by Tavares' own attorneys Lehman and BSK&S, and Fine's fabrication of fraudulent indicia of membership interest and corporate resolutions of Tavares' companies Brickell Village, IBAC, 2147, and BV, and five counts of mail and wire fraud, and presiding Judge Langer's systematic violations of law and Tavares' rights under color of law, also depriving Florida and the United States of honest services, to further brazen criminal scheme before courts of law. Once the associates shown their loyalty to the Enterprise and commitment to the criminal scheme ("blood oath"), they all know they are joined together in the Enterprise and implicated Associates cannot turn against the Enterprise, and having to continuously commit acts to silence truth and the victims, and in return, being rewarded by the Enterprise with protection, interest in assets, and business opportunities for family members, and nominations in political, law enforcement, and judicial positions to further strength the Enterprise's powers undermining the rule of law and rights in the United States of America and elsewhere they operate freely. See *Omertà Code* at <https://en.m.wikipedia.org>. See also E-Filing #78979877 at Exhibit B, on 10/08/18.

Harold Eugene Lindsey III ("Lindsey III") (Florida Bar No.130338) at Katz Barron Squitero & Faust, P.C. ("Katz"), all in fatal and in an impermissible legal representation extorting, as part of the criminal scheme to extort and deprive Tavares upon sham civil proceedings in Florida.

13. From January 2010 thru January 2011, Tavares' attorneys Lehman and Rojas try to coerce Tavares into a bogus settlement giving Bridgeloan Tavares' Brickell Village Buildings properties and the 9 acres Miami River property ("Tavares' Properties"), valued at the time well in excess of \$50 million dollars, in lieu of the \$12 million dollars Bridgeloan loan. As Tavares does not accept, nor authorizes anyone to accept the sham settlement, Tavares' attorneys together with Brazilian attorney Olten Ayres de Abreu Jr.<sup>6</sup> ("Abreu Jr."), working at FBT Avocats S.A. ("FBT") secretly fabricate bogus fraudulent Power of Attorneys ("POAs") in the Republic of Panama using Fake officers and agents from Panamanian attorney Ramon Anzola-Robles ("Anzola-Robles") at Global Corporate Services, Inc., and having the signatures in the facially erroneous and clearly fraudulent POAs' notarized in the Republic of Panama by Public Notary Roberto R. Rojas Contreras ("Roberto Rojas") in order to trick the court, and extort and deprive Tavares of his properties and rights upon sham proceedings. As Tavares uncovers the invalid, false and fraudulent settlement upon a sham mediation, predicated on the secret and fraudulent POAs', then Tavares' own attorneys Lehman, and Larry Allen Stumpf ("Stumpf") (Florida Bar No.280526), and Jared Michael Lopez ("Lopez") (Florida Bar No.103616) at Black Srebnick Kornspan & Stumpf, P.A. ("BSK&S"), threat, coerce and successfully extort Tavares of rights and properties, and shameless proceed with the scheme. *See* E-Filing #47458403 on 10/11/16.

14. On or about April 8, 2011 at 10:00 a.m., in an unnoticed sham trial presided by implicated Judge A. Lester Langer ("Judge Langer") (Florida Bar No.137828), attended by implicated attorneys Lehman and BSK&S representing Tavares, Hall representing Bridgeloan and Katz representing BNY Mellon, Judge Langer enters a void final judgment against Tavares and his companies, predicated on the fraudulent settlement that all know is false and invalid, giving more than \$50 million dollars of Tavares' properties to Bridgeloan in lieu of a \$12 million dollar loan caused into default by Bridgeloan in order to extort and deprive, under color of law, Tavares of his properties and rights upon the sham civil proceedings. Showing the attorneys' conscious of guilt, they attempt to file with the clerk, hours after the legal farce took place, a late and bogus Notice of Trial, which is rejected by the Clerk of the Courts. *See* Record 3D16-2475.

15. As Tavares starts to uncover the schemes, and denouncing them to, *e.g.*, the Miami Court, fires Lehman in April 2011 for fraud, filing two Florida Bar Complaints against Lehman ("Bar Complaint") No. 2011-71,184 [III], and No. 2013-70,433(11G), and despite that, Lehman stays in an unauthorized and fraudulent representation of Tavares' companies for over

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<sup>6</sup> Abreu Jr. is a Brazilian attorney (OAB-SP No.75.820 and OAB-RJ No. 116.844) at [www.abreujr.com.br](http://www.abreujr.com.br), and, also a counsel at Wilhelm Gillieron Avocats S.A., see [www.wg-avocats.ch](http://www.wg-avocats.ch), in Lausanne, Switzerland.

sixteen months, successfully intimidating and extorting<sup>7</sup> Tavares' new attorneys, obstructing justice in the civil proceedings, and upon the retirement of implicated Judge Langer in December 2012, the Enterprise installs Judge Norma S. Lindsey<sup>8</sup> ("Judge Lindsey"), wife of implicated attorney Lindsey III, to preside the case in furtherance of the scheme, in fatal conflict of interest, obstructing justice, covering up, extorting Tavares of properties and rights under color of law, and further depriving the State of Florida and the United States of America of honest services.

16. On December 5, 2011, after the bogus settlement predicated on false, invalid and fraudulent POAs' for Tavares' companies is "legalized" by the Miami Court in an unnoticed sham trial of April 8, 2011, the Enterprise starts money laundering the proceeds upon the court by transferring for \$4,300.00 (Four Thousand Three Hundred Dollars) Tavares' Brickell Village buildings ("Brickell Properties") sat on 105,000 SF of land, to BRIXRIV, LLC<sup>9</sup> ("BRIXRIV") (Tax Id.# N/A, see [www.sunbiz.org](http://www.sunbiz.org)). *See* Miami-Dade County Record CFN 2011R0587029.

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<sup>7</sup> Before a scheduled hearing of November 13, 2012 to be heard before Judge Langer on Tavares' motion to reopen the case for fraud upon the court by implicated officers of the court, Tavares new attorneys Richard Allen Morgan ("Morgan") (Florida Bar No.836869), and James Doddo ("Doddo") (Florida Bar No.30242) at Buchanan Ingersoll & Rooney, P.C. ("BIPC") are successfully threatened and coerced on October 25, 2012 by implicated attorneys Andrew Clifford Hall ("Andy Hall") (deceased in 2019), and Matthew Paul Leto ("Leto") (Florida Bar No.14504), to cancel the hearing and withdraw the filed motion to reopen the case due to frauds by officers of the court, and further demonstrating the power of the Enterprise, Tavares' attorneys at BIPC are ordered by the criminals to withdraw from Tavares' representation, which they do following the orders, further depriving Tavares of rights upon Florida courts. Five (05) law firms hired by Tavares had the same treatment, showing the Enterprise's powers to freely corrupt and subvert in furtherance of schemes, obstruction of justice, successfully evading law enforcement.

<sup>8</sup> Most of the implicated Judges in the criminal schemes depriving and extorting Tavares under color of law, and further depriving Florida and the United States of honest services, are appointed, and reappointed, despite Tavares' complaints, by then Florida Governor Richard Lynn Scott ("Governor Rick Scott"), *e.g.*, Judge Joseph I. Davis Jr. ("Judge Davis"), Judge Fine, Judge Lindsey, Judge Bronwyn C. Miller ("Judge Miller") (Florida Bar No.119441), and Judge Carlos Manuel Guzman ("Judge Guzman") (Florida Bar No.115990). Judge Lindsey, and other judges implicated willfully violate Judicial Canons 1., 2.A.B., and 3.B.(1)(2)(5)(7)(8)E(1); 42 U.S.C. § 1985; and 18 U.S.C. §§ 1343 & 1344. *See* Judicial Complaint No.18.062 v. Judge Lindsey. *See* E-Filing #64563234 on 11/24/2017.

<sup>9</sup> The Enterprise uses associates Bridgeloan and BANIF, with their linked banking, securities, and real estate businesses to money launder billions of dollars of illicit proceeds, tax evade, and perpetrate bank and mortgage frauds. Then, the Enterprise, *e.g.*, Slosbergas and Hugo Barreto Del Priore ("Del Priore"), Sergio Capela ("Capela"), and Marco Antonio de Souza ("De Souza"), after swindling BANIF, the bank collapses, causing billions of dollars in losses to stockholders and account holders, the Portuguese government and others, and despite that, the Enterprise, freely and unafraid, continues to use, *e.g.*, BANIF's companies in the United States, in the Cayman Islands, and other jurisdictions, to further tax defraud the United States and others. *See* BANIF Finance (USA) Corp. A/K/A BANIF Mortgage Corp. N/K/A Weston Capital USA Corp. (Tax ID. # 32-0006395), money laundering billions of dollars through the United States from schemes and proceeds derived from unlawful activity for more than fifteen (15) years. *See also* BANIF Brickell, LLC (Tax Id. # N/A, see [www.sunbiz.org](http://www.sunbiz.org)), and BANIF Miami River, LLC (Tax Id. # N/A, see [www.sunbiz.org](http://www.sunbiz.org)), companies wholly owned by BANIF and Bridgeloan.



17. On December 5, 2011, after the bogus settlement predicated on false, invalid and fraudulent POAs' for Tavares' companies is "legalized" by the court in an unnoticed sham trial of April 8, 2011, the Enterprise's Bridgeloan uses their artifices to money launder the proceeds by transferring Tavares' 9 acres (379,411 SF of land) Miami River property ("River Properties") to RIVBRIX, LLC ("RIVBRIX") (Tax Id.# N/A, see [www.sunbiz.org](http://www.sunbiz.org)) for \$1,100.00 (One Thousand One Hundred Dollars). See Miami-Dade County Record CFN 2011R0823883.

18. On December 18, 2012, RIVBRIX, in furtherance of the scheme money laundering the proceeds derived from unlawful activity, transfers three parcels of the River Properties to Finlay B. Matheson's ("Matheson") companies, South Fork Parcel 1, LLC, a Florida limited liability company (Tax Id.#46-5296498), transferring 123,428 SF<sup>10</sup> of land for \$1,320,000.00 (\$10.69 per SF) (CFN 2012R0912652), and to South Fork Parcel 2, LLC, a Florida limited liability company (Tax Id.# N/A, see [www.sunbiz.org](http://www.sunbiz.org)), transferring 69,696 SF of land for \$800,000.00 (\$11.48 per SF) (CFN 2012R0912669), and South Fork Parcel 3, LLC, a Florida limited liability company (Tax Id.# N/A, see *Id.*) (CFN 2012R0912691) ("Matheson Companies"), transferring 176,287 SF of land for \$2,880,000.00 (\$16.33 per SF). See Miami-Dade County Records showing Warranty Deed prepared by associate Slosbergas.

19. On May 17, 2013, in furtherance of the scheme money laundering the proceeds derived from unlawful activity, RIVBRIX transfers a 10,000 SF land parcel of the River Properties for \$50,000.00 (\$5.00 per SF) to Pedro Mantilla's ("Mantilla") company Coral Group Property Advisors, Inc. ("Mantilla Company") (Tax Id. # 46-1968325).<sup>11</sup> See Miami-Dade County Record CFN 2013R0416072, and Warranty Deed prepared by associate Slosbergas.

20. On July 25, 2013, in furtherance of the scheme money laundering the proceeds derived from unlawful activity, the Enterprise, using Bridgeloan's JABIR, LLC (Tax Id. #46-1220650), transfers 28,000 SF of land of the 105,000 SF of land of the Brickell Properties to Behringer-Harvard Project Owner, LLC, a Delaware LLC ("Behringer") for \$5,600,000.00 (\$200 per SF).<sup>12</sup> See Miami-Dade County Record CFN 2013R0587260, Warranty Deed prepared by Shutts & Bowen, LLP.

<sup>10</sup> Public Records show that, on October 15, 2015, Matheson, from Parcel 1, resells 31,556 SF of the Parcel's 123,428 SF for \$1,500,000.00 (\$47.53 per SF) to Miami River Waterfront, LLC (Tax Id. #47-2882985). See Miami-Dade County Record CFN 2015R0662043, or at Book 29816 page 1919.

<sup>11</sup> On September 28, 2015, Mantilla transfers title to another of his companies, 2000 Coral Group, LLC (Tax Id.#47-5608150), and on June 30, 2021, Mantilla sells, for \$250,000 (\$50 per SF), to Tricon Group Holdings, LLC.

<sup>12</sup> Miami-Dade County Public Records do not show any additional transfer from BRIXRIV of the remaining 77,000 SF of land in the 105,000 SF (2.4 Acres) land parcel of the Brickell Properties derived from the Enterprise's unlawful activity. Shortly after the extortion of Tavares' Brickell Properties in 2011, the Enterprise, e.g., quickly demolishes the existing buildings and build a four hundred eighteen (418) apartment rental building to further launder the proceeds using a complex web on entities and artifices to further cover up the schemes by the Enterprise.

21. On February 14, 2014, in furtherance of the scheme money laundering the proceeds from unlawful activity on Tavares' Brickell Properties, Behringer changes its corporate name to Monogram Residential Brickell Project Owner, LLC, a Delaware LLC. ("Monogram"). See Miami-Dade County Record CFN 2014R0758569 and at Book 29374 page 2735-2739, Resolutions signed by Daniel J. Rosenberg as General Counsel – Securities & Risk Mgt.

22. On September 27, 2016 at 3:17 p.m., after years of systematic obstruction of justice by Judges Lester, Lindsey, and other officers of the court implicated in the scheme extorting Tavares of rights and properties, under color of law, Judge Lisa Sharon Walsh ("Judge Walsh") (Florida Bar No. 964.610), holds, on Tavares' pro se motion to reopen the case due to fraud upon the court by officers of the court, a sham in-chambers hearing, steps away from Judge Lindsey's chambers, attended by Tavares, and implicated attorneys Leto and Lindsey III – husband of implicated Judge Lindsey, and an individual that himself, and the court refused to identify, see Hearing's Transcript<sup>13</sup> at E-Filing #48132157 at p.3 ¶¶ 18 – 25, and, *Id.* at p. 4 ¶¶ 1 – 17. Despite the truth and the record displayed showing systematic fraud upon the court by officers of the court, subverting the court to extort and deprive Tavares of rights and properties, under color of law, Judge Walsh irreconcilably refuses to reopen the case, covering up the fraud.

23. On September 29, 2017, in furtherance of the scheme money laundering the proceeds from unlawful activity on Tavares' Brickell Properties, Monogram changes its corporate name to GS Brickell Project Owner, LLC, a Delaware LLC ("GS Brickell"), showing the manager as GS Brickell Investors, LP. See [www.sunbiz.org](http://www.sunbiz.org), document # M13000003886, submitted by Wolters Kluwer N.V. A/K/A CT Corporation System (Tax Id. #51-0006522) A/K/A The Corporation Company (Tax Id. #51-0099484) ("Wolters Kluwer").

24. On March 12, 2018, the 3DCA denies an appeal by Tavares – Judge Lindsey, now an appeal's judge – after being appointed by Governor Rick Scott, is recused from the case due to conflicts of interest as wife to attorney Lindsey III. See 3DCA Case No. 3D16-2475.

25. On March 21, 2018, the Supreme Court of Florida, inexplicably, in violation of Tavares' rights, issues an order against Tavares, under color of law, see E-Filing #69622072 at 04:35:39 PM, predicated on a fabricated and false appeal fraudulently filed by the Supreme Court of Florida in name of Tavares, which Tavares did not authorize or pay for, nor authorized anyone to file or pay for, see Case No. SC18-435 (3DCA No. 3D16-2475), and, contrary to, e.g., Section 25.241(2)(a) Florida Statutes, and Title 18, United States Code, Section 242.

26. On March 26, 2018, after Tavares notices the Supreme Court of Florida's Clerk John Anthony Tomasino ("Clerk Tomasino") (Florida Bar No. 106.021). Then, Clerk Tomasino

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<sup>13</sup> Tavares, upon reviewing the transcript from court reporter Sheilamarie Caro at National Reporting Services, Inc. (Tax Id. #65-1138396), duly notices that the transcript has been deliberately adulterated to blur the record, showing the Enterprise's powers to systematically corrupt anyone, undermining the rule of law and democracy. See *Tr.*



issues an order dismissing “the petition” since “This case was improvidently set up and is hereby dismissed,” showing the fabrication by the courts to deprive Tavares. See E-Filing #69788141.

The BCP-Car Wash Case Scheme: Cases No.:2011-29624-CA-30 and 3D17-2583; and the Second Bogus Fabricated Case Before the Supreme Court of Florida, Case No.: SC18-2148.  
See E-Filing #86000128 on 03/07/2020.

27. On July 28, 2011, Rojas with the Enterprise’s associates Elba Bethancourt and Giselle Ocampo at Mossack Fonseca & Co.(“Mossack Fonseca”) in the Republic of Panama, and Gabriela Maranhao Machado Guimaraes<sup>14</sup> (“Guimaraes”)(D.O.B. 08/17/1965, in Brazil), and criminal Peter F. Valori (“Peter”) (Florida Bar No.43516), at Damian & Valori, LLP (“Valori”), fabricate bogus corporate resolutions for Tavares’ companies Brickell Commerce Plaza, Inc. (“BCP”), and The Car Wash Concept, Inc. (“Car Wash”), purportedly as the “Sole Shareholder” of BCP and Car Wash, that they all know in truth and in fact to be fraudulent, in order to extort and deprive Tavares, under color of law, of properties and rights upon sham civil proceedings, showing same actors repeating same *modus operandi* against victim Tavares, upon same corrupt and subverted Miami Court. See Tavares’ BCP Affidavit, E-Filing #91765899 on 06/27/2020.

28. On September 15, 2011, Valori and Guimaraes, predicated on the bogus corporate resolutions they fabricated with Rojas and Mossack Fonseca to hijack Tavares’ companies, institute a sham case using Tavares’ own companies against him, continuing their successful schemes extorting and depriving Tavares, under color of law, of all his properties and rights upon sham civil proceedings, and to silence Tavares from further exposing the Enterprise. *Id.* 28.

29. On September 21, 2011 at 1:21 pm, before Tavares is served service of process of the sham complaint, Valori fabricates and file with the court two (02) fraudulent return of service of process tricking the court to believe Tavares was served the complaint and motions before the sham hearing extorting Tavares under color of law. See E-Filing #63775609 on 11/05/2017.

30. On September 21, 2011 at 2:02 p.m., in furtherance of the scheme upon the court, Valori files an improper notice for a sham evidentiary hearing of September 22, 2011 at 8:00 a.m. – eighteen hours before the hearing, and willfully not serving the notice upon Tavares. *Id.*

31. On September 22, 2011 at 8:00 a.m., in a sham hearing held by corrupted Judge Langer, and attended by Valori, without Tavares, which has not been served the complaint nor any notice of hearing, Judge Langer enters a void order to deprive and extort Tavares, under

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<sup>14</sup> Guimaraes is a Brazilian associate of the Enterprise and the daughter of corrupt Brazilian politician Gilson Machado Guimaraes Filho (“Gilson Machado”), sent to the United States on a fraudulent H1B Visa (SRC-01-064-50670), improperly sponsored by her father’s company Grand City Development Corp., a Florida corporation (Tax Id. #65-0780665), to money launder corruption moneys and to operate global tax and mortgage schemes through the United States. Upon Tavares uncovering and exposing the Enterprise’s schemes, Guimaraes, together with associates engage in extortion of Tavares rights and properties. See E-Filing #91765899 on 06/27/2019.

color of law, allowing the Enterprise to hijack Tavares' companies and assets, replacing Tavares from his companies BCP and Car Wash with the Enterprise's associate Guimaraes. *Id.*

32. On July 17, 2012, Valori files a Plaintiffs' BCP and Car Wash motion to compel arbitration pursuant to BCP's Shareholders' Agreement of February 14, 2000, between Tavares and Joao Evangelista da Costa Tenorio ("Tenorio"), as the two sole shareholders of BCP, after Valori deceived the court with fraudulent corporate resolutions in the false complaint and pleadings, and statements to the court on September 22, 2011, that "the sole shareholder had removed Tavares from BCP," demonstrating that Valori and Guimaraes never had – nor could they have had proper authority to act on behalf of BCP and Car Wash as Plaintiffs in the case, exposing the farce extorting Tavares under color of law. *See* E-Filing #64563234 on 11/24/2017.

33. On or about July 31, 2012, implicated Judge Langer, in reckless disregard for the truth and record displayed showing his void order of September 22, 2011 is predicated on fraudulent indicia, authority and pleadings by Valori and Guimaraes' fraudulent sworn affidavit in support of the sham complaint to hijack Tavares' companies, while further, knowingly and intentionally omitting the Agreement from its pleadings and affidavits, enters another bogus order in furtherance of the scheme requiring arbitration between the two (02) shareholders. *Id.*

34. On August 16, 2013, because Tenorio and his wife Maria Fernanda Quintela Brandao Vilela ("Fernanda Vilela") suspect Valori is sabotaging an agreed settlement between Tavares and Tenorio, they request Tavares and their personal representative Antonio Carlos de Almeida Castro ("Kakay") to meet in Prague, Czech Republic, to finalize the agreed settlement.

35. On August 19, 2013, after meetings between Tavares and Kakay, and discussions with Tenorio and Fernanda Vilela, the final settlement agreement of BCP and Car Wash is reaffirmed by Tavares and Tenorio, providing Tavares, *e.g.*, a \$500,000 cash payment and their forty six (46%) interest on 139TH Avenue S.W. 8TH Street, LLC, a Florida LLC ("139 TH"). *Id.*

36. On February 20, 2014, Rojas, Guimaraes and Valori secretly<sup>15</sup> and fraudulently transfer and sell Tavares' BCP and Car Wash real properties and personal properties at the 30,000 SF of land property, with a building Tavares built on 2001, at 250 S.W. 7 Street, Miami, Florida 33130, to Walgreen Co., an Illinois company N/K/A as Walgreens Boots Alliance, Inc.,

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<sup>15</sup> Tavares' BCP/Car Wash/Personal Properties are not marketed or listed for sale, as duly noted by the Property Appraiser's website, stating that, "Not exposed to open-market; atypical motivation." *See* Miami-Dade County Property Appraiser Website. Walgreens and its agent George K. Kidman ("Kidman"), knowingly and intentionally enables the Enterprise to money launder the proceeds, as they knew Tavares is one of two shareholders of BCP, owner of the property, and sole owner of his personal properties, and Tavares never knew or consented to the invalid and fraudulent sale by Rojas and Guimaraes, falsely, invalidly and fraudulently representing BCP with fabricated indicia of authority as the "Sole Shareholder" of BCP *See also* E-Filing #64563234 at Exhibit C, on 11/24/2017.

an Illinois company ("Walgreens"),<sup>16</sup> for \$6,742,500.00, or about 1/3 of the \$20 million dollars true value of the property. Criminal associates Valori, Rojas, Mossack Fonseca and Guimaraes steal all proceeds derived from the improper transfer and sale. See Records for the void sale and transfer Miami-Dade County Record CFN 2014R0151383, and at Book 29049 pages 679 and 680, prepared by associate Rojas and signed by Guimaraes as president of Tavares' BCP.

37. On February 26, 2015, to further the scheme, Judge Migna Sanchez-Llorens ("Judge Sanchez-Llorens"), holds a sham hearing, improperly noticed for a date the court and criminal Valori knew Tavares is travelling in Asia and could not attend it, entering a void final order against Tavares – and falsely stating the hearing was held on "2014," and not in 2015, and further ordering the clerk to erase the record on the case to cover up the extortion and deprivation of Tavares' rights and properties under color of law, showing the Enterprise's *Omertà Code*.

38. On April 2, 2015, Walgreens, after Tavares' demands to Walgreens and its CEO Stefano Pessina ("Pessina"), see Letter RRR on 12/11/2014 USPS #7013 1710 0001 3724 1253, to return Tavares' stolen properties. Then, Walgreens, dealing across state lines with property derived from specified unlawful activity, resells the stolen properties to Marathon Lodging, LLC, a Florida LLC ("Marathon"), for \$15,500,000.00. See Record CFN 2015R0220918.

39. On July 7, 2015, Marathon, after Tavares' demands to Marathon and its principals Chirag B. Desai ("Desai"), and Amit N. Patel ("Patel") to return Tavares' stolen properties, Marathon transfers, for \$100.00 (one hundred dollars), the stolen properties to Rockville Hospitality Group, LLC, a Maryland LLC ("Rockville") (Tax Id. #27-1613332), another company controlled by Desai and Patel. See Miami-Dade County Record CFN 2015R0553997.

40. From 2011, to now, the record shows the Enterprise's Valori, et al.'s shameless continuous pattern of racketeering upon Florida courts, systematically corrupting and subverting the courts to successfully extort and deprive, under color of law, Tavares of properties and protected rights, never returning the stolen proceeds from the fraudulent sale of Tavares' properties to Walgreens, and further using a foundation Educate Tomorrow, Corp., a Florida corp. (Tax Id. #51-0493526), to money launder proceeds, and showing the vast corruptive powers of the Enterprise over elected officials, judges, the Florida Bar, the Florida Judicial Qualifications Commission, greedy and reckless corporations, and over law enforcement, and the courts, showing their schemes spreading to other jurisdictions, clearly undermining the rule of law and our democracy, furthering brazen schemes against U.S. citizens, U.S. corporations, Federal, State, and local governments, presenting a grave and present danger to the United States of America that must be stopped before it vitiates society. See [www.google.com](http://www.google.com) at #FBiknows.

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<sup>16</sup> Walgreens, knowingly and intentionally, purchases Tavares BCP's properties and Tavares' personal properties at 250 S.W 7 Street, Miami, FL 33130, derived from the Enterprise's specified unlawful activity, money laundering across state lines the proceeds for the Enterprise, and further profiting millions of dollars by reselling the stolen properties across state lines, enabling the Enterprise's successful schemes. See E-Filing #64563234 on 11/24/2017.



The Repeated Fabricated and Malicious Domestic Repeat Violence Cases by the Enterprise to Falsely Incriminate Tavares Depriving, Under Color of Law, Tavares of Protected Rights Cases No.: 2012-3753-FC-04 and No.:2012-24483-FC-04 (the “Double Jeopardy Case”)

41. On February 13, 2012, following written threats against Tavares by criminal Valori in November 2011, Geania A. Fraga (“Fraga”), a property manager of Bridgeloan and BANIF, and Guimaraes, hire false witnesses Maritza C. Calix (“Calix”), and Dunia I. Pacheco (“Pacheco”) (D.O.B. 03-26-1968, in Honduras), with Valori’s attorney Russell Marc Landy (“Landy”) (Florida Bar No.44417), file Fraga’s first fabricated case against Tavares, falsely accusing Tavares of verbally threatening and following Fraga, in order falsely incriminate Tavares under color of law. *See* Case 2012-3753-FC-04. Presiding Judge Davis, Jr., intentionally and knowingly presiding the sham case in conflict, and with bias and prejudice against Tavares, as the former president and shareholder of Markowitz Ringel Trusty + Hartog, P.A. f/k/a Markowitz Davis Ringel & Trusty, P.A., one of Tavares’ trust account holders since 2005, when Tavares deposited \$500,000.00 into their escrow for a required remediation on the Bridgeloan scheme. Concurrently with the Fraga sham case, in July 2012, Bridgeloan, BANIF, and Markowitz, file another sham case against Tavares’ company Miami River Park Marina, Inc. (“MRPM”), Case No.:2012-21795-CA-22, successfully depriving, under color of law, Tavares and his company of rights and the escrow moneys, by among other things, knowingly and intentionally obstructing justice in the civil proceedings, never serving Tavares the complaint, motions, and notices of hearings as the sole legal authority of MRPM. Then the totally corrupted and subverted Miami Court, to further the scheme, improperly releases Tavares’ escrow moneys to a non-party to the action, allowing the Enterprise to freely steal and money launder moneys.

42. On October 3, 2012, Fraga, together with Valori, Guimaraes, Pacheco, and Calix, file Fraga’s second fabricated and false complaint of Domestic Repeat Violence against Tavares, Case No.2012-24483-FC-04, before same implicated Judge Davis Jr. The criminals emboldened by their total subversion of Florida courts, file the Double jeopardy sham case against Tavares, now claiming Tavares had “kidnapped Fraga at gun point in March 2006,” see Transcript of hearing of November 5, 2012 at page 8, ¶¶ 11 – 19, showing their total disregard for the law.

The 139 TH Bogus Case by the Same Bad Actors Against Same Victim Tavares in the Same Corrupted Courts, Cases No.:2018-29700-CA-04 ; No.:3D18-2144; and, No.:3D19-0249

43. In August 2003, Tavares founded his company 139TH Avenue S.W. 8TH Street, LLC (“139 TH”)(Tax Id.#65-1202407), and at the time had a six percent (6%) interest. Tenorio’s company West Eighth Corp., a Florida company (“West Eighth”) (Tax Id. #02-0719677), held a forty six percent (46%) interest of 139 TH. At all times, up to the time the Enterprise hijacked 139 TH with fraudulent indicia of membership interest, fabricated on March 22, 2018, by criminals Valori, Rojas, Guimaraes and Slosbergas, Tavares is a sole manager and registered

agent. The criminals use bogus resolutions of 139 TH showing a signature of a Straw Man, the Fake "Officer" and "Director" Fernando Menendez Montes ("Montes") (Republic of Panama ID #8-354-306), also used by the criminals in thousands of bogus fabricated documents, i.e., in the Odebrecht/Petrobras' mega global schemes. *See Fake Montes at www.opencorporates.com.*

44. On August 18, 2013, Tavares, by virtue of an agreed settlement with his partner Tenorio and wife Maria Fernanda Brandao Vilela ("Vilela"), principals of West Eighth, a member of 139 TH, with an interest of forty six percent (46%), agrees to transfer to Tavares the 46% interest on 139 TH, so Tavares becomes, since August 2013, the sole majority interest holder of 139 TH with a combined fifty two percent (52%) majority controlling interest.

45. On November 3, 2015, attorney Steven Carlyle Cronig ("Cronig") (Florida Bar No.307.068) at Hinshaw & Culbertson LLP ("Hinshaw Law") (FEI #36-2128133), in furtherance of the known criminal scheme by Criminals Guimaraes, Rojas, et al., extorting and depriving Tavares under color of law, of his properties and rights in the United States, submits a bogus 2-page letter, see Hinshaw's document reference #15143784v1 0976942, to some Shareholders of 139 TH purportedly representing West Eighth, and showing Cronig's criminal associates Yvette Rogers ("Yvette") as President and Director, and Francis Perez ("Francis") at Mossack Fonseca, and stating West Eighth's "Current Principal Place of Business" and address for Yvette and Francis at Mossfon Bldg, 2nd Flr. E. 54th Street, Panama Republic of Panama. The Florida's Secretary of State records for corporations show C T Corporation System (FEI #51-0006522) a.k.a Wolters Kluwer N.V. ("Wolters Kluwer") (NASDAQ symbol WTKWY, and on EURONEXT as WKL), as West Eighth's Registered Agent with an address at 1200 South Pine Island Road, Plantation, Florida 33324, USA. *See West Eighth's Annual Reports on 04/16/2015, and on 03/30/2016 at www.sunbiz.org ("Sunbiz").*

46. On November 14, 2015 at 12:15 p.m., after Tavares is notified by some Shareholders of 139 TH that they are receiving improper letters by Hinshaw Law unduly attempting to remove Shareholder Tavares as 139 TH's Sole Manager, Sole President and Sole Registered Agent, see 139 TH's annual reports of April 23, 2015, and April 6, 2016 at Sunbiz, Document No. L03000029150, in order to hijack and steal 139 TH's assets, Tavares submits an e-mail to Hinshaw's attorney Cronig at scc@hinshawlaw.com, and also via a Certified U.S. Postal Mail to 2525 Ponce de Leon Boulevard, 4<sup>th</sup> Floor, Coral Gables, Florida 33134, with a demand letter as 139 TH's sole authority requesting Cronig stop his improper actions conspiring jointly and together with other bad domestic and foreign actors, perpetrating continuous torts interfering with the regular business of 139 TH, and to stop extorting and depriving Tavares.

47. On November 17, 2015 at 9:14 a.m., attorney Cronig at Hinshaw Law replies to Tavares' letters demanding Cronig, et al. stop the conspiracy to extort and deprive Tavares, stating among other things, that Cronig "disagrees with Tavares' allegations and Tavares' view of applicable law" relating to his alleged torts and conspiracy extorting and depriving Tavares.

48. On August 4, 2017, the Enterprise, through its associate Del Priore, submits to Tavares, as the sole manager and majority interest holder, a bogus offer by AHS Development Group, LLC (Tax Id.# 46-0844516) A/K/A AHS Residential, LLC, a Florida LLC (Tax Id. #30-0993248) A/K/A (“AHS”),<sup>17</sup> attempting to extort Tavares to sell 139 TH’s 29 acres property for \$3 million dollars - or about 1/5 of the \$15 million dollars market value of the property. Tavares, uncovers and exposes the scheme to Tavares’ partners, and also the fact that AHS is associated with Slosbergas and associates in the corruption schemes of Odebrecht/Petrobras.

49. On December 7, 2017, Wolters Kluwer, showing a Sunbiz account number FCA000000023, telephone (512) 418-6949, and Fax (954) 208-0845, files with Sunbiz on behalf of West Eighth, corporate resolutions by Guimaraes, showing an address at 80 SW 8 TH Street, Suite #2061, Miami, Florida 33130 and an e-mail Gabriela@g2InvestUSA.com , stating that Fake officers and directors<sup>18</sup> Yvette and Francis having been removed from West Eighth, and installing a Fake “Fernando Menendez Montes” (“Montes”) as president and director, with an address at “Salduba Building, 3rd Fl. 53rd East St., Marbella, Panama City, Panama.” See [www.sunbiz.org](http://www.sunbiz.org) at Document No. P03000092488 on 12/07/2017.

50. On March 16, 2018, after the initial attempts to extort Tavares and 139 TH of its properties and rights with the bogus \$3 million dollars offer from AHS, Slosbergas, as part of the Enterprise’s schemes extorting and depriving Tavares under color of law of properties and rights upon Florida courts, fabricates false and invalid resolutions with a bogus signature of a Fake Montes, providing fraudulent authority to remove Tavares as 139 TH’s sole manager and agent, and purportedly instituting criminals Rojas, Guimaraes, et al., as managers of 139 TH.

51. On March 21, 2018, Slosbergas, realizing the bogus resolutions of March 16, 2018 do not pass the smell test, issues another bogus resolution stating in pertinent parts that, “This letter shall serve to confirm that in an effort to give all Members the opportunity to vote and consent to the removal of the current manager and president and the change of registered agent, it is hereby confirmed that the previous Statement of Written Consent shall be disregarded and that is has been replaced and substituted with the attached statement of Written Consent to be signed by all the Members of the Company.” Slosbergas, in truth and in fact well knows that, pursuant to 139 TH’s bylaws and agreements, only Tavares, as the sole manager and majority interest holder of 139 TH is authorized to act with proper authority on behalf of 139 TH, and Tavares did not authorize, nor consented to Slosbergas to act or cause others to act on behalf of 139 TH. As such, Slosbergas actions on behalf of 139 TH are false and invalid.

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<sup>17</sup> AHS is presided by Ernesto Lopes – a former Odebrecht director, and affiliated with Brazilian homebuilder MRV Engenharia S.A. (“MRV”), and Banco Inter, controlled by Rafael Menin and Rubens Menin Teixeira de Souza.

<sup>18</sup> The Criminals use Fake Officers, Directors and Agents to adulterate, forge, extort, and defraud U.S. companies, U.S. Citizens, Title Companies, Banks, the United States, State, and local governments, evading the law. See *Aff.*



52. On March 22, 2018, Slosbergas, and the Enterprise's associates, *e.g.*, Guimaraes, Rojas, Del Priore, formerly at BANIF, together with a Fake Straw Man Montes in the Republic of Panama, fabricate additional bogus corporate resolutions of 139 TH, that they all well know in truth and in fact to be false, invalid and fraudulent, in order to falsely remove Tavares, hijacking the company to further extort and deprive Tavares of his properties and rights upon sham court proceedings. Slosbergas, in furtherance of the criminal scheme extorting and depriving, willfully violates, among other Federal and State Statutes, Florida Bar Rule 4-8.4 (a)(b)(c)(d) (e)(f) - Misconduct. *See* The Florida Bar Rules of Professional Conduct Rule 4-8.4.

53. On April 23, 2018, a Fake Montes purportedly signs, as West Eighth's Sole President and Director, its Annual Report with Sunbiz, showing its Principal Place of Business, Mailing, and Montes" address at "C/O Gabriela MM Guimaraes G2 Investments 80 SW 8 TH Street #2061 Miami FL 33130." Wolters Kluwer is listed as the registered agent. *See* [www.sunbiz.org](http://www.sunbiz.org) at Document No. P03000092488 of 04/23/2018.

54. On or about August 30, 2018, Valori, together with Rojas, Guimaraes, et al., file a sham complaint purportedly on behalf of 139 TH to remove Tavares from his company 139 TH and steal its assets. As in their BCP scheme, Valori intentionally never attempts to serve the complaint upon Tavares, see ¶ 27, which Tavares found out about the civil suit upon researching court records, in a scheme to extort Tavares of properties and rights under color of law.

55. On October 15, 2018, the Court, under color of law, willfully deprives Tavares of his properties and rights, in an improperly noticed sham hearing held by Judge Miller, on Valori's sham motion, in a date the Court and Valori well knew Tavares could not, and did not attend, and that at all times material Valori has been willfully systematically corrupting, subverting, and obstructing justice with sham pleadings, false representations, and false authority of 139 TH predicated on fraudulent authority and evidence fabricated by Valori, Rojas, Guimaraes, et al., to continue extorting and depriving Tavares. *See* E-Filing #78934255.

56. On January 16, 2019, Valori, in furtherance of the criminal scheme upon the Miami Court, files a bogus notice for trial, see E-Filing #83454056, contrary to Florida Rule of Civil Procedure 1.440. *See* Tavares' Motion opposing on 01/17/2019 at E-Filing #83480232.

57. On March 13, 2019, a Fake Montes purportedly signs as West Eighth's Sole President, Director and Manager, its Annual Report with Sunbiz, showing its Principal Place of Business, Mailing, and Montes" address at "C/O Gabriela MM Guimaraes G2 Investments 80 SW 8 TH Street #2061 Miami FL 33130." Guimaraes is listed as the registered agent with an address at 80 SW SW 8TH Street, Suite 2000, Miami, FL 33130. *See* [www.sunbiz.org](http://www.sunbiz.org) at Document No. P03000092488 of 03/13/2019.

58. On March 21, 2019 at 2:00 p.m., Tavares, pursuant to 139 TH's bylaws and operating agreement for Records and Books, and as specifically set forth at page 10 ¶ 9.2, entitling all of 139 TH's Shareholders to inspect all books and records of 139 TH, and after giving proper and reasonable notices to all "managers," and to 139 TH's registered agent of record, Slosbergas<sup>19</sup> at NS Corporate Services, Inc.(Tax Id. 65-0620280), a.k.a. NS Company Services, LLC (Tax Id. 87-3990956), at 1110 Brickell Avenue, Suite 310, Miami, Florida 33131, and providing multiple notices served via e-mail and FedEx on March 4 and 17, 2019. Upon Tavares arrival at 139 TH's registered address, the receptionist, Ms. D. Guzman sits Tavares in the conference room and serves a bottle of water, and goes to call the registered agent Slosbergas. After a few minutes, an office manager by the name of Ms. Ana - refusing to provide her last name, tells Tavares he could not see or inspect the records and books of 139 TH, and asks Tavares to leave. Then, Tavares shows her relevant documents demonstrating that Tavares is entitled as a Shareholder of 139 TH to inspect and make copies, at his own expense, of all books and records of 139 TH, and that numerous proper notices were given to Slosbergas and managers. She again refuses access to the records and books, and calls the building's security to ask Tavares to leave, at which time Tavares calls 911 requesting the City of Miami Police Department to send officers to file an incident report showing these facts. Two officers come, officer Rojas and officer D. Ivy which upon Tavares repeated requests writes an incident report under Case No. 19032100094133. *See* E-Filing #87478391 on 04/04/2019.

59. On April 2 and 8, 2019, Valori, in furtherance of the criminal scheme upon the Miami Court, already representing Plaintiff's entity 139 TH with false authority, files notices of representation and motions on behalf of Third-Party Defendants and criminal associates, Del Priore, Rojas, Rojas law firm R&S International Law Group, LLP, Slosbergas, and Slosbergas law firm Nelson Slosbergas, P.A., all criminal associates of the Enterprise implicated in the brazen schemes upon the courts. *See* E-Filings # 87355449, #87649009, and #91765899.

60. On April 3, 2019, Judge Guzman enters a verbal notice of trial on April 16, 2019 to "both parties," in violation of the minimum requirement of 30 days proper notice under Florida Rule of Civil Procedure 1.440(c), depriving Tavares of rights under color of law.

61. On April 10, 2019, criminals Guimaraes and Rojas, after hijacking Tavares' company 139 TH with bogus indicia and fraudulent schemes upon the Miami Court, file on

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<sup>19</sup> Criminal Slosbergas is replaced on April 23, 2019 as Registered Agent by Wolters Kluwer, which then, following Shareholder Tavares' seven (7) proper formal requests to Wolters Kluwer as Tavares' 139 TH's purported Registered Agent, wilfully and systematically failing to provide access, or copies to any and all requested relevant corporate information, books and financial reports that all shareholders like Tavares are entitled pursuant to 139 TH's bylaws, in order to obstruct justice and to continue extorting and depriving Tavares of his properties and rights, covering up their schemes, showing the criminals hide behind shell companies, and bad Fake Officers/Agents like Wolters Kluwer knowingly using forged documents and fabricated evidence to extort and deprive. *See* 139 TH's Shareholders Agreement page 10 at ¶ 9.2(b) at E-Filing #77268631 Exhibit A, on 03/30/2018 at 3:40:04 p.m..

behalf of 139 TH, using Tavares' name and address as the signor, fraudulent tax filings for 139 TH, in furtherance of their global schemes. *See* E-Filing #91765899 at Exhibit C, on 06/27/2019.

62. On April 16, 2019, in an improperly noticed sham trial by Judge Guzman, in conscious and reckless disregard for truth and the record displayed, and in further clear violation of rule 1.440(c), § 38.10(f) (1), Fla. Stat. (1993), and Fla. R. Jud. Admin. 2.160(f), Judicial Canon 3, due process, and Tavares' rights, holds an improper non-jury trial. *See* Trial Tr. at E-Filing #91756331. During the sham trial, because Judge Guzman never entered any orders denying both of Tavares' motions for his disqualification, Tavares asks Judge Guzman if he ruled on the motions, and Judge Guzman replies that he denied, although never entering or serving the orders denying both motions, and only serving the denial order upon the ongoing proceedings, again, in flagrant violation of § 38.10(f)(1), Fla. Stat. (1993), and Fla. R. Jud. Admin. 2.160(f), Judicial Canon 3, due process, and Tavares' rights. *See* Trial Tr. 16 at ¶¶ 8–25, *Id.* at 17 at ¶¶ 1–25, and, *Id.* at 18 at ¶¶ 1–16. Upon questioning by Tavares regarding his ruling on Tavares' motion to continue trial, heard on April 1, 2019, as Judge Guzman never enters an order, granting or denying Tavares' motion, showing his systematic violations of Tavares' rights under color of law, Judge Guzman states, “I – we denied it after the calendar call. [April 1, 2019] That's why you're here today [Trial April 16, 2019].” *See* Trial Tr. at E-Filing #91756331 at 169 at ¶¶ 23 – 24. At trial, while Tavares is deprived of due process and rights upon the civil proceedings by Judge Guzman and other officers of the court, *see, Id.* at 173 – 175, in proceedings vitiated by fraud, where the only witnesses is attorney Rojas, implicated in the schemes against Tavares since 2009, appearing as Vice President of litigation for 139 TH, also a member of 139 TH, a longtime criminal associate of Valori and Guimaraes, and a Third-Party Defendant, also represented by Valori against Tavares, all in fatal conflict, contrary to Bar Rule 4-1.7, further shown on the record by Rojas' repeatedly committing perjury under oath by knowingly making repeated false and contradictory statements to the court, showing the legal farce upon the subverted court. *See* Trial Tr. E-Filing #91756331 at 141 at ¶¶ 19 – 21.

63. On April 23, 2019, the Third District Court of Appeal of Florida, extorting Tavares under color of law, enters a bogus,<sup>20</sup> deficient and void judgment, considered and adjudicated by two judges, Ivan F. Fernandez (Fla. Bar No. 977.926) and Eric William Hendon (Fla. Bar No. 276.324) contrary to, i.e., art. V, § 4(a), Fla. Const. requiring three judges, for

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<sup>20</sup> Criminals at Damian & Valori, LLP a.k.a D & V, LLP | Culmo Law, using their Florida Bar Licenses as guise to extort and deprive Tavares upon a subverted court, fabricating bogus corporate authority, filing a sham motion for attorneys' fees against Tavares, claiming thousands of dollars in bogus “statement for fees,” charging, e.g., attorney Adam Grant Schultz (Florida Bar No. 121.111) hours of “legal research responding to Tavares' pleadings” even before Tavares filed aforesaid pleadings, showing the total legal farce. *See* E-Filing #91877309, on June 28, 2019.



attorney's fees against Tavares, as part of scheme<sup>21</sup> upon Florida courts to deprive Tavares of all rights upon Florida courts, in order to continually destroy Tavares financially and cover up the systematic violations of Tavares' rights, showing the rule of law is not guaranteed to U.S. Citizens in Florida. See Florida Supreme Court Appeal No.: SC21-1535, *Charles A. Tavares v. 139TH Avenue S.W. 8TH Street, LLC* - the only Appeal ever filed by Tavares before the Florida Supreme Court, at E-Filings #137960737 on 11/05/2021 and #141448689 on 01/06/2022.

64. On April 23, 2019, a bogus Annual Report is filed on behalf of 139 TH, purportedly signed by "Brian Mueller" at Wolters Kluwer as Registered Agent and by "Gabriela Maranhao Machado Guimaraes" as an "Authorized Person" for 139 TH. The bogus report further shows six (06) different entities controlled by the criminals – and not persons, as "Authorized Persons." See [www.sunbiz.org](http://www.sunbiz.org) at Document No. L03000029150 on 04/23/2019.

65. On May 29, 2019, Judge Guzman, showing he is shameless corrupted by the scheme, extorting and depriving Tavares of rights and properties under color of law, enters a void and fraudulent Final Judgment against Tavares, stating, contrary to, § 837.06, Fla. Stat., that his decision is based on facts and testimony presented at trial on "April 23, 2019," (the sham trial took place on April 16, 2019), to conceal his violations of rule 1.440, and depriving Tavares of rights under color of law, contrary to, Title 18, U.S.C., § 242, Title 42, U.S.C., § 1985, and further, systematically and consciously depriving the State of Florida and the United States of America of honest services upon courts of law in the United States, contrary to, Title 18, § 1346, and contrary to, § 837.06, Fla. Stat., and in violation of Judicial Canons 1, 2, and 3, and, contrary to his sworn oath to support the Constitution, contrary to, Fla. Const., Article VI, § 3, rendering Judge Guzman's decisions forever null and void, and showing their *Omertà Code*.

66. On January 21, 2020, a Fake Montes purportedly signs, as West Eighth's Sole President and Director, its Annual Report showing its Principal Place of Business, Mailing, and Montes' address at "C/O Gabriela MM Guimaraes G2 Investments 80 SW 8TH Street #2000 Miami FL 33130." Guimaraes is listed as registered agent with an address at 3193 Oak Avenue, Miami, FL 33133. See [www.sunbiz.org](http://www.sunbiz.org) at Document No. P03000092488 on 01/21/2020.

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<sup>21</sup> The record displayed shows the Enterprise's total subversion of the judicial machinery in Florida, causing the courts to systematically deprive and extort U.S. citizen Tavares under color of law of his properties and protected fundamental constitutional rights upon courts of law in the United States of America, and even systematically corrupting court reporters by causing them to repeatedly adulterate the civil proceedings' transcripts in order to alter and blur the transcribed bogus proceedings, and defrauding Tavares of a true and proper record showing a criminal scheme, see also, the subversion by Valori's D & V, LLP | Culmo Law, of court reporters, for example, Daughters Reporting, Inc. (Tax Id. 46-4642885), causing the transcripts to be systematically adulterated to blur the court records showing the extrinsic fraud upon the court, at E-Filing #97732849, on October 23, 2019, showing the rule of law and the U.S. and Florida Constitutions being systematically violated to extort and deprive upon Florida courts.

67. On March 23, 2020, a bogus Annual Report is filed on behalf of 139 TH, purportedly signed by “Eric Hood” at “Cogency Global, Inc.” (“Cogency”) (Tax ID #13-3246732) as Registered Agent, and by “Gabriela Maranhao Machado Guimaraes” as an “Authorized Person” for 139 TH. The bogus report further shows six (06) different entities controlled by the criminals – and not persons, as “Authorized Persons.” *See* [www.sunbiz.org](http://www.sunbiz.org) at Document No. L03000029150 on 03/23/2020.

68. On July 17, 2020, corrupted Judge Guzman, enters a bogus order for Tavares’ to show cause on Valori’s motion to prevent Tavares from defending himself from the Enterprise’s scheme upon the court, predicated on a hearing on “May 14, 2020.” *See* E-Filing #110428096.

69. On July 19, 2020, Tavares files a response showing cause as to why the court should not further deprive Tavares of his first amendment rights as a victim to defend himself from the Enterprise’s criminal schemes on the courts depriving Tavares of properties and rights, and the State of Florida and the United States of honest services. *See* E-Filing #110444538.

70. On July 27, 2020, Judge Guzman, in furtherance of the brazen criminal scheme upon the court, enters, in reckless disregard for the truth, the record displayed, and the rule of law, a void order further depriving Tavares of his first amendment rights, purportedly preventing Tavares from defending himself in the sham proceedings. *See* E-Filing #110833799.

71. On January 22, 2021, a bogus Annual Report is filed on behalf of 139 TH, purportedly signed by Hood at Cogency as Registered Agent, and by “Gabriela Maranhao Machado Guimaraes” as an “Authorized Person” for 139 TH. The bogus report further shows six (06) different entities controlled by the criminals – and not persons, as “Authorized Persons.” *See* [www.sunbiz.org](http://www.sunbiz.org) at Document No. L03000029150 on 01/22/2021.

72. On February 17, 2021, a Fake Montes purportedly signs, as West Eighth’s Sole President and Director, its Annual Report with Sunbiz, showing its Principal Place of Business and Mailing at 3193 Oak Avenue, Miami, FL 33133, and Montes’ address at “C/O Gabriela MM Guimaraes G2 Investments 80 SW 8 TH Street #2000 Miami FL 33130.” Guimaraes is listed as the registered agent with an address at 3193 Oak Avenue, Miami, FL 333133 . *See* [www.sunbiz.org](http://www.sunbiz.org) at Document No. P03000092488 on 02/17/2021.

73. On April 8, 2021, attorney Cronig at Hinshaw Law despite, among other things, previous notices and evidence, and known public records displayed, among others, Tavares’ Recorded Affidavit, see Miami-Dade County Records at CFN 2019R0192232 or Book 31380 pages 3656-3663 recorded on March 26, 2019, showing a criminal scheme systematically extorting and depriving Tavares under color of law, of his properties and rights upon bogus

subverted courts, by criminals Guimaraes, Rojas, Valori, Slosbergas, Montes,<sup>22</sup> et al., files with the Florida Secretary of State certain corporate resolutions for 139 TH, on behalf, and purportedly with authority for Tavares' 139 TH, authorizing criminals Guimaraes and Rojas to, among other things, sell 139 TH's Properties and assets, see the bogus Statement of Authority by Hinshaw Law (Hinshaw ref. # CR2E138 (2/14)), and charging the filing fees to its SUNBIZ Account #I201600 00072. *See* [www.sunbiz.org](http://www.sunbiz.org), Document No. L0300029150 on 04/08/2021.

74. On March 3, 2022, a Fake Montes purportedly signs, as West Eighth's Sole President and Director, its Annual Report showing its Principal Place of Business and Mailing at 3193 Oak Avenue, Miami, FL 33133, and Fake Montes address at "C/O Gabriela MM Guimaraes G2 Investments 80 SW 8 TH Street #2000 Miami FL 33130." Guimaraes is listed as the registered agent with an address at 3193 Oak Avenue, Miami, FL 333133. *See* [www.sunbiz.org](http://www.sunbiz.org) at Document No. P03000092488 on 03/03/2022.

75. On March 12, 2022, a bogus Annual Report is filed on behalf of 139 TH, purportedly signed by Hood at Cogency as Registered Agent, and by a Fake "Fernando M. Montes" as Manager. The bogus report further shows six (06) different entities controlled by the criminals – and not persons, as "Authorized Persons." *See* [www.sunbiz.org](http://www.sunbiz.org) at Document No. L03000029150 on 03/12/2022.

76. On March 25, 2022, criminal Rojas, using corporate letterhead for his law firm R&S International Law Group, LLP (Tax Id. 26-1545601) a.k.a R&S Mas, LLC (Tax Id. 82-5240937) files with the Florida Secretary of State, a Dissociation/ Resignation Statement as Manager of Tavares' 139 TH, and among other things, states Rojas dissociated/resigned as "Manager" of 139 TH on February 5, 2022. *Id.* on 03/25/2022.

77. On March 28, 2022, Wolters Kluwer, files on behalf of criminal Guimaraes, purportedly as "Authorized Representative" for Tavares' 139 TH, sham Corporate Resolutions reinstating<sup>23</sup> Wolters Kluwer as Tavares' 139 TH's Registered Agent, and charging the filing fee for the change to its Sunbiz account #FCA000000023. *Id.* on 03/28/2022.

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<sup>22</sup> Criminals Guimaraes and Rojas, in reckless disregard for the law, continue fabricating bogus authority for Tavares' 139 TH using bogus signatures, repeatedly copying and pasting these signatures from a Panamanian Straw Man, a Fake "Fernando Menendez Montes," which also was systematically used in the Mega Corruption and Bribery schemes for PETROBRAS/ODEBRECHT, *see*, for example, 139 TH's bogus Statement of Authority filed by Cronig on 04/08/2021 page 02, at *Id.*; and, 2022's Corporate Annual Report by a Fake Montes on 03/12/2022.

<sup>23</sup> On March 23, 2020, as part of the scheme covering up the extortion, Wolters Kluwer is replaced as 139 TH's Registered Agent, *see* Document No. L03000029150 at [www.sunbiz.org](http://www.sunbiz.org), after Tavares' serves a Tenth notice to Wolters Kluwer, requesting documents from the purported Registered Agent, and denouncing and showing the brazen criminal scheme extorting and depriving Tavares, under color of law, of interests and rights on 139 TH. *See*, e.g., Tavares' Notice to Wolters Kluwer, delivered via FedEx #780 052 408 760 on 09/26/2019 at 10:24 a.m.



78. On April 18, 2022, Sunshine Corporate Compliance Company submits to Sunbiz, purportedly on behalf of 139 TH, corporate resolutions for 139 TH, and charging the filing fees to its Sunbiz account #I20160000072. On April 20, 2022, Terri J. Schroeder, a Regulatory Specialist III at the Florida Department of State's Division of Corporations, after reviewing aforesaid resolutions, submits a letter number: 322A000 09218 rejecting criminal Rojas' previous sham filing because the effect date of Rojas' dissociation/ resignation provided is incorrect. The filing includes a bogus Second Statement of Authority of 139 TH granting, among other things, sole authority to criminal Guimaraes to sell and transfer all assets and Properties of Tavares' 139 TH, further stating that 139 TH's business and mailing address is 3193 Oak Avenue, Miami, Florida 33133, the known home address for criminal Guimaraes. The signature pages of the resolutions are clearly grossly adulterated and forged showing among other things, markings of copy and paste from previous bogus signatures of Fake Montes and others used to fabricate sham corporate resolutions and authority for 139 TH. *Id.* on 04/20/2022.

79. On May 4, 2022, attorney Cronig at Hinshaw Law, purportedly on behalf of Tavares' 139 TH, submits, via US Postal Mail, a letter (ID# 1037147\310683462.v1) informing Tavares that, among other things, the "Managers" of 139 TH completed<sup>24</sup> a bogus sale of the 29 Acres of land owned by 139 TH to NV Sand Group, Inc., a Florida corporation ("NV Sand") (FEI# 87-1122591) presided by Nelson Varona, Sr. ("Varona"), on May 3, 2022, for \$15,125,000.00 (Fifteen Million One Hundred Thousand Twenty Five Thousand Dollars), and that the net sales proceeds were \$13,999,158.45 (Thirteen Million Nine Hundred Ninety Nine Thousand One Hundred Fifty Eight Dollars 45 Cents), and that, accordingly, Tavares' proceeds will be \$737,021.69<sup>25</sup> (Seven Hundred Thirty Seven Thousand Twenty One Dollars 69 Cents). Cronig attaches to his letter, a bogus Settlement Statement ("HUD-1") (File # CLGL-122) form with five pages showing criminal Guimaraes signing on for seller 139 TH on May 2, 2022 and no signature for Varona's NV Sand. The HUD-1 form shows that 139 TH paid a total of \$907,500.00 (Nine Hundred Seven Thousand Five Hundred Dollars) in commissions to brokers The Katsikos Group, Inc., a Florida corp. (FEI#20-3165923) presided by Lee S. Katsikos<sup>26</sup> (jointly "Katsikos") receiving \$453,750.00 (Four Hundred Fifty Three Thousand

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<sup>24</sup> 139 TH's Property was not publicly marketed/advertised after hijacked by the Criminals, showing their same scheme and *modus operandi* as in the BCP Property, see ¶ 32, and no prior notices by the "Managers" of 139 TH were provided to Shareholder Tavares relating to the purported sale of all Tavares' 139 TH's Properties.

<sup>25</sup> Tavares proceeds based in the stated sales price of the property in the HUD-1 Statement, and accordingly to Tavares' 52% interest on 139 TH is \$6,919,700.00, and additionally, pursuant to 139 TH's Shareholders' Agreement for Tavares' Syndication Fee of 5% of the net proceeds in a sale over \$5 million is \$700,375.00, and additionally, Tavares' brokerage fee of 3% of the sales price is \$453,750.00, for a total of \$8,073,825.00, which is now owed to Tavares. See 139 TH's Shareholders' Agreement of 09/16/2003 at Section VII on page 8. Also, Tavares' is owed by his company 139 TH, about \$20,240.32 in loans by Tavares to 139 TH. See also, Amended Loan Agreement at Public Records Miami-Dade County at CFN 2019R0237806 or Book 31407 page 2599.

Seven Hundred Fifty Dollars) and “Your Commercial Realty Group”<sup>27</sup> also receiving \$453,750.00 (Four Hundred Fifty Three Thousand Seven Hundred Fifty Dollars). The settlement agent is CM Law Group, LLC a.k.a. Cosculluela & Marzano, P.A. with attorneys Michael Cosculluela (“Cosculluela”) (Fla. Bar No. 189.480) and Daniel J. Marzano (“Marzano”) (Fla. Bar No.189.804) as agents for First American Title Insurance Company<sup>28</sup> a.k.a First American Financial Corporation (“First American”) (stock symbol NYSE “FAF”) charging \$36,575.00 (Thirty Six Thousand Five Hundred Seventy Five Dollars) for the owner’s Title Insurance Policy, and charging 139 TH \$400.00 (Four Hundred dollars) for “Title Search Fee to First American.” The United States’ HUD-1 Form also shows charges to 139 TH for “City/ County Tax/Stamps Deed” in the amount of \$68,062.50 (Sixty Eight Thousand Sixty Two Dollars and 50 cents) and “State Tax/ Stamps deed mortgage \$90,750.00 (Ninety Thousand Seven Hundred Fifty Dollars). The HUD-1 also shows 139 TH paying “Lien Letters to One-Step Lien Search LLC (FEI #65-11 36977) in the amount of \$798.00 (Seven Hundred Ninety Eight Dollars), and “legal fees” paid to Hinshaw Law in the amount of \$50,000.00 (Fifty Thousand Dollars) to participate in the brazen scheme extorting and depriving Tavares.

80. On May 18, 2022 at 11:28:31 a.m., Hinshaw’s attorney Cronig records an erroneous bogus fabricated Special Warranty Deed for Tavares’ 139 TH’s 29 acres properties – Folios #30-4903-003-0270; #30-4903-003-580; #30-4903-003-590; #30-4903-003-600; #30-4903-003-0610; #30-4903-003-620 and #30-4903-003-0630 (the “Properties”), with the Miami-Dade County Clerk of the Courts, see Public Records [www.onlineservices.miami-dadeclerk.com](http://www.onlineservices.miami-dadeclerk.com) at CFN:20220402953 or Book 33192 pages 3521 – 3524 (Clerk’s File No.2022 R 402953) transferring the Properties for \$15,125,000.00 (Fifteen Million One Hundred Thousand Twenty Five Thousand Dollars) from “139th Avenue S.W. Eighth Street, LLC, a Florida limited liability company” to “NV SAND GROUP, Inc., a Florida corporation”, and showing Deed Documentary Stamp taxes paid in the amount of \$90,750.00 (\$0.70 per \$100) and Not paying the required Surtax of \$68,062.50 (\$0.45 per \$100). The bogus Special Warranty Deed prepared by

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<sup>26</sup> Katsikos is a longtime real estate associate of Guimaraes and her father, former Brazilian Politician Gilson Machado, dealing mostly with warehouses and industrial properties in Miami-Dade County, Florida.

<sup>27</sup> Public Records at [www.sunbiz.org](http://www.sunbiz.org) and the [www.myfloridalicense.com](http://www.myfloridalicense.com) do not show any company named “Your Commercial Realty Group” but shows a company named “Your Home Realty Group, Inc., a Florida corporation (FEI #83-1891196) (Real Estate License #’s CQ1056980 & CQ1032309) presided by Omar Lugo, and having a Nelson Varona employed as a real estate sales associate (License #SL3112340). See Public Records.

<sup>28</sup> First American has knowingly enabled for decades criminals Rojas and Slosbergas to perpetrate extortion and fraudulent schemes against their clients/property owners/title insurance holders by allowing criminals Rojas and Slosbergas to be First American’s Agents underwriting title insurance policies in fatal conflict as attorneys, principals, agents, and officers of underlying entities in order to set up the schemes, eventually extorting and defrauding owners. See, e.g., Tavares’ Claim No. FL-1309404434 under Tavares’ First American Policy No. FA-35-1226121 for \$8,250,000.00 for Tavares’ Brickell Village One, LLC/2147 SW 8 TH Street, LLC’s property. See also, Certified Mail RRR #7012 3050 0002 3453 9741 to First American’s Dennis J. Gilmore on 04/24/2013.

Hinshaw Law's attorney Cronig dated "May 3<sup>rd</sup> 2020" (Hinshaw #1049001\310510712.v2) purportedly on behalf of 139 TH, and purportedly signed in the Republic of Panama by a certain "Fernando Mendez Montes," ("Montes"), a Fake<sup>29</sup> President and Manager of 139 TH and purportedly controlling the companies. The bogus fabricated Special Warranty Deed is filed together with a deficient bogus "Notarial Acknowledgment"<sup>30</sup> for "Fernando Mendez Montes" purportedly acknowledged before "Giovanna Libeth Santos Alveo" ("Giovanna Santos"), a Notary Public from the "Notaría Cuarta Del Circuito" for the Province of Panamá, Republic of Panamá, stating that "*I have compared the foregoing signature with the one on the passport of the signatory and in my opinion, it is similar, therefore, said signature is authentic*",<sup>31</sup> see Book 33192 at Page 3524. The bogus contradictory document is also purportedly witnessed by a "Nereida Esther Moreno Cerrud de Serrano" ("Nereida Cerrud") and a "Katia Jannette Smith Chavez" ("Katia Jannette") that along with Montes, are fraudulently used by bad actors as fake officers and agents in thousands of offshore companies perpetrating major crimes and schemes, furthering, among other things, the fraudulent transfer of properties in the United States of America, defrauding U.S. companies and its shareholders, and defrauding U.S. citizens of properties and rights, Title Insurance companies, Banks, the United States of America, the State of Florida, and local governments, furthering money laundering of illicit proceeds, subverting the rule of law in the United States and elsewhere, contrary to, among other violations, Title 18, U.S.C. §§ 1341, 1343, 1344, 1346, 1349, 1951, 1957, 1961, *et seq.*, Title 42, U.S.C., § 1985; and Florida Statutes, Sections 837.021, 837.06, 837.12; 895.03; and 896.101. *See also* Montes, Nereida Cerrud and Katia Jannette, also used by the criminals as Fake officers, managers and agents in thousands of companies mostly for illicit purposes, at [www.opencorporates.com](http://www.opencorporates.com).

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<sup>29</sup> The bad actors implicated, first use janitors and other unrelated parties in the United States as Fake officers and agents, then use bad actors in the Republic of Panama to fraudulently "legalize" bogus documents with Fake Panamanian officers and agents and corrupt Public Notaries as part of their schemes extorting and defrauding, see page 5 at ¶ 13, systematically defrauding U.S. companies, U.S. citizens, banks, title insurance companies, the United States of America, the State of Florida, and local governments, showing total disregard for the rule of law and rights.

<sup>30</sup> The Criminal Enterprise takes advantage of loopholes and faulty language, for example, on Florida Statute 695.03 pertaining to Deeds transferring properties in Florida, allowing for, and recognizing, a Deed that is signed outside the United States by one with purportedly proper authority by simple "acknowledgment," by among others, any Notary Public in any Country in the World that is recognized by that government as a Notary. *See* F.S. Title XL, Section 695.03(3) (2022) for Deeds acknowledged Outside of the United States. The faulty Florida Statute allowing bad foreign actors from any Country in the World, including any corrupt Notary Public in the Republic of Panama, Russia, North Korea, China, and Iran, to freely and fraudulently acknowledge bogus transfer of properties in Florida, together with reckless bad domestic actors, is potentially a major threat to all property owners, title insurance companies, banks, U.S. companies, the United States Government, and the State of Florida, as repeatedly shown here, subverting the rule of law and our democracy. *See, e.g.,* Hinshaw's and Marzano's fraudulent Deeds.

<sup>31</sup> Hinshaw Law's Two (2) bogus fabricated Special Warranty Deed filed with the Clerk are intentionally erroneous and contradictory (*Omerà Code*), showing, *e.g.,* on first page Deed prepared in "2020," and reused in the second filing by forging the same instrument, see Book 33256 page. 153, signed by "Fernando Mendez Montes." *Id.* at 156.



81. On May 18, 2022 at 11:28:31 a.m. – back-to-back, at the same exact date and time of filing the previous bogus fabricated Special Warranty Deed for Tavares’ 139 TH’s Properties, attorney Marzano at Cosculluela files a bogus fabricated Warranty Deed dated May 3<sup>rd</sup>, 2022, showing Nelson Varona, Sr. executing the Warranty Deed as President of Grantor, and having Adrian M. Varona and Orland Martinez as witnesses in the Deed - see Public Records [www.onlineservices.miami-dadeclerk.com](http://www.onlineservices.miami-dadeclerk.com) at CFN: 20220402954 or Book 33192 pages 3525 – 3526 (Clerk’s File No.2022 R 402954) transferring the Properties for \$10.00 (Ten Dollars) from “NV. SAND GROUP, Inc., a Florida corporation” to “137 AVE 8<sup>TH</sup> ST Holdings, LLC, a Florida limited liability company” (Sunbiz Document No. L22000110411 - showing No Authorized Officers and No Tax ID) registered on March 1<sup>st</sup>, 2022 by Rene F. Leoncio, having “Leoncio & Associates, LLC, a Florida limited liability company” (Sunbiz Document No. L04000060588) (Tax ID# 20-15187-10) as its registered agent. See [www.sunbiz.org](http://www.sunbiz.org).

82. On June 20, 2022, Tavares submits to implicated attorney Cronig at Hinshaw Law via FedEx #274618412309 delivered on June 22, 2022 at 1:54 p.m., a Demand Letter and supporting documents and evidence demanding Cronig, *et al.*, to stop their brazen willful actions fraudulently transferring Tavares’ 139 TH’s Properties by erroneous, false, invalid and fraudulent Special Warrant Deeds predicated on bogus fabricated authority of Fake Montes.

83. On June 23, 2022 at 11:26 a.m., Hinshaw’s attorney Cronig records a corrective<sup>32</sup> bogus fabricated Special Warranty Deed for Tavares’ 139 TH’s 29 acres Properties to money launder the illicit proceeds, see [www.onlineservices.miami-dadeclerk.com](http://www.onlineservices.miami-dadeclerk.com) CFN: 2022R0508565 or Book 33256 pages 153–156 (Clerk’s File No.2022 R 508565) transferring again the Properties for \$15,125,000.00 (Fifteen Million One Hundred Thousand Twenty Five Thousand Dollars) from “139th Avenue S.W. Eighth Street, LLC, a Florida limited liability company” to “NV SAND GROUP, Inc., a Florida corporation”, stating on Book 33256 page 153 below ¶ 4 that, “*This Special Warranty Deed is being re-recorded in order to pay the Surtax on the Deed which was not collected at the time of the original recording on 5/18/22, in ORB 33192, Page 3521, Miami-Dade County, FL.*” The bogus Deed now shows paid Surtax of \$68,062.50 (\$0.45 per \$100) \$100). The bogus fabricated corrective Special Warranty Deed prepared by Hinshaw’s Cronig clearly shows Hinshaw Law adulterating and forging the previous bogus fabricated Special Warranty Deed, willfully and erroneously dated May 3<sup>rd</sup>, 2020 and Not 2022, further showing Hinshaw Law erasing on Page 154 the Firm’s address and document reference number

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<sup>32</sup> Hinshaw Law’s Cronig, after receiving Tavares’ Demand on June 22, 2022, instead of drawing a new proper instrument correcting, among other things, the brazen facial errors in the first bogus fabricated Special Warranty Deed and having the Fake Montes and other bad foreign actors purportedly execute the new instrument, Cronig, in furtherance of the brazen scheme defrauding 139 TH, Shareholder Tavares, First American Title, the United States, the State of Florida and Miami-Dade County, Cronig simply forges the same bogus first Deed by, among other things, erasing his address on the bottom of first place, inserting a “Corrective Statement” and keeping the same brazen facial errors like the year the instrument is prepared, “2020” and a bogus signature by a Fake “Fernando Mendez Montes,” showing reckless disregard for the rule of law. See [www.onlineservices.miami-dadeclerk.com](http://www.onlineservices.miami-dadeclerk.com).

in order to fit the “Corrective Statement”, as shown on Pages 154 – 156 still having Hinshaw’s previous Document reference number #1049001\310510712.v2. Cronig files the same bogus signature page by Fake President/Manager Mendez Montes and Fake Witnesses Nereida Cerrud and Katia Jannette, fraudulently acknowledged by Notary Giovanna Santos in Panama.

84. On July 15, 2022, Tavares submits to the bad actors implicated in the false, invalid and fraudulent transfer and sale of Tavares’ 139 TH’s Properties and extortion of Tavares’ rights, Civil Theft Notices pursuant to Florida Statue Title XLV, § 772.11 (2022) for violations of ss.812.012-037 (2022), demanding them to immediately return the Properties and restore Tavares’ rights. *See* Civil Theft Notices to: Hinshaw Law’s Chairman Peter D. Sullivan (“Sullivan”) at Hinshaw’s Law Headquarters at 151 North Franklin Street, Suite 2500, Chicago, IL 60606, delivered on July 19, 2022 at 2:04 p.m. via FedEx #2756 3007 0411; and, to Hinshaw’s Law Cronig at 2525 Ponce de Leon Boulevard, 4<sup>th</sup> Floor, Coral Gables, FL 33134, via FedEx #2756 3012 0144 delivered on July 18, 2022 at 10:33 a.m.; and, to Wolters Kluwer’s CEO Nancy McKinstry (“McKinstry”) at Headquarters at Zuidpoelsingel 2 – NL 2400 BA Alphen aan den Rijn – The Netherlands, delivered via FedEx #2756 3329 3108 on July 20, 2022 at 10:46 a.m., and to Wolter Kluwer’s C T Corporation System at 1200 South Pine Island Road, Suite 250, Plantation, Florida 33324, delivered via FedEx #2756 3016 0814 on July 18, 2022 at 10:07 a.m.; and to Criminal Guimaraes at 80 S.W. 8TH Street, Suite 2000, Miami, Florida 33131, via FedEx #2756 3321 4942 delivered on July 19, 2022 at 9:33 a.m., and to 3193 Oak Avenue, Coconut Grove, Miami, Florida 33133, delivered via FedEx #2756 3330 3087 on July 19, 2022 at 12:02 p.m. *See also*, Civil Notice to Criminal Rojas at R&S International Law Group, LLP at 1000 Brickell Avenue, Suite 400, Miami, Florida 33131, delivered via FedEx #2746 9148 8177 on June 24, 2022 at 11:54 a.m.

85. On July 20, 2022 at 3:20 p.m., attorney Marzano at Cosculluela records another bogus fabricated Warranty Deed,<sup>33</sup> see public records [www.onlineservices.miami-dadeclerk.com](http://www.onlineservices.miami-dadeclerk.com) CFN: 20220580169 or Book 33299 pages 2713 - 2714 (Clerk’s File No.2022R 580169) transferring Tavares’ 139 TH’s Properties for \$10.00 (Ten Dollars) and paying \$0.60 on Deed Documentary Taxes and \$0.45 on Surtax, from “NV Sand Group, Inc., a Florida corporation” to “137 AVE 8TH ST Holdings, LLC, a Florida limited liability company.” Marzano’s prepares the bogus Warranty Deed document showing a reference File No.: CLGL-122, and it is signed

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<sup>33</sup> The second consecutive bogus Deed by Marzano at Cosculluela invalidly and fraudulently transferring Tavares’ 139 TH’s Properties predicated on false, invalid and fraudulent Special Warranty Deeds fabricated by Cronig at Hinshaw clearly shows the implicated bad actors reckless disregard for the law and rights by repeatedly and systematically willfully defrauding U.S. companies, U.S. Shareholders, title insurance companies, banks, the United States of America, the State of Florida and Miami-Dade County, showing that they can potentially, and are, freely defrauding any property owner or shareholder they choose in the United States of America, repeatedly and continuously violating the laws of the United States and State laws, and using their schemes and artifices, including using Fake Officers and Fake Agents, acting together with bad domestic and foreign actors, without boundaries or consequences to their brazen criminal schemes subverting the rule of law and democracy wherever they operate.

on “July 1<sup>st</sup>, 2022” by NV’s president Nelson Varona, Sr., witnessed by attorneys Michael Coscullela and Marzano, and the bogus Deed is notarized by Marzano. The duplicate bogus fabricated Special Warranty Deed and Warranty Deed to money launder illicit proceeds is clearly false, invalid, and fraudulent, predicated on bogus fabricated authority of Fake President and Manager Montes that did not, and could not have had authority over Tavares’ 139 TH, rendering the bogus transfer of Tavares’ 139 TH’s Properties by implicated attorneys Cronig and Marzano, conspiring jointly together with others implicated, forever null and void.

86. On August 17, 2022, Tavares returns to Hinshaw Law via FedEx, the bogus Cashier’s Check issued to Tavares in the amount of \$737,021.69 (Seven Hundred Thirty Seven Thousand Twenty One Dollars 69 Cents), from “Hinshaw & Culbertson LLP IOTA Trust Account (Real Estate)” issued on July 19, 2022 by Grove Bank & Trust, Branch 0006, in reference to “Our Matter #1049001 – 139 Ave SW 8TH Sale of Land,” to Hinshaw’s Law Chairman Sullivan, delivered on August 19, 2022 at 11:20 a.m. See FedEx #777681686767.

87. On September 14 and 15, 2022, Tavares attempts to contact “Notaria” Giovanna Santos via telephone (+507 223-5774) at the Cuarta Notaría del Circuito da Provincia de Panamá to confirm if she recognizes her signature and Seal in the facially erroneous and fraudulent Special Warranty Deed transferring all of Tavares’ Properties in Miami, Florida, United States. After Tavares talks to Giovanna Santos’ Assistant Mrs. Olivia a couple times, Giovanna Santos e-mails Tavares on September 15, 2022 at 11:57 a.m. EST from notaria4tapanama@gmail.com, asking Tavares to resubmit the erroneous and fraudulent Deed prepared in “2020,” and purportedly signed by Fake “Fernando Mendez Montes” and witnessed by Fake witnesses Nereida Cerrud and Katia Jannette, which are notorious “Fake” officers fraudulently used by the Enterprise, before Giovanna Santos in the Republic of Panama.

88. On September 23, 2022 at 12:53 p.m. EST, Giovanna Santos, after numerous requests by 139 TH’s Shareholder Tavares, including but not limited to via e-mails, hand delivered via Messenger on September 21, 2022, and Certified Panamanian Postal Service on September 22, 2022, see Registered Mail #RP834014354PA, Giovanna Santos e-mails Tavares, stating that it is indeed her signature and Seal on the facially erroneous and fraudulent Deed, showing same *modus operandi* in the Republic of Panama<sup>34</sup> by the Criminal Enterprise, among other erroneous and bogus fabricated things, that the Deed was prepared in “2020,” purportedly

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<sup>34</sup> The record shows criminals Rojas, Lehman, Abreu Jr., and Anzola-Robles, continuing mocking the laws in the United States, and everywhere, previously using another corrupt Notary in the Republic of Panama Roberto Rojas, then a “Notario Público Noveno del Circuito de Panamá, Id. No. 4-100-1144” to fraudulently notarize on March 28, 2011 a facially erroneous and bogus fabricated Limited Power of Attorneys purportedly giving secret authority to Abreu Jr. over Tavares’ companies in the United States in order to secretly extort and deprive Tavares of Properties owned by Tavares’ companies Brickell Village One, LLC, 2147 S.W. 8<sup>th</sup> Street, LLC, and Miami River Park Marina, Inc., under color of law, causing more than US\$50,000,000.00 (Fifty Million Dollars) in losses to Tavares, see ¶¶ 10 – 22, and at E-Filing on 08/20/2020 at 12:27:45 p.m., successfully money laundering the illicit proceeds.



executed by Fake “Fernando Mendez Montes” and by Fake witnesses Nereida Cerrud and Katia Jannette, “Acknowledged” on April 22, 2022 by another corrupt Notary in the Republic of Panama, Giovanna Santos at “Cuarta Notaría” in Panama, showing the Enterprise continuously using corrupt bad actors to subvert and mock institutions in the United States, systematically extorting and defrauding U.S. citizens, U.S. companies, Title Companies, Banks, the United States Government, the State of Florida, and Miami-Dade County. *See* Record.

89. Cronig, Marzano, Giovanna Santos, and others implicated in the scheme, clearly knew, and had to know, that the Special Warranty Deeds and the Warranty Deeds are erroneous, false, invalid and fraudulent, filed repeatedly to blur the record and cover up the brazen scheme extorting and depriving Tavares of his properties and rights, further violating Federal and State Statutes, thus showing again the Enterprise’s *Omertà Code*, whereas the Associates need to knowingly commit at least two (2) flagrant violations of law in order to show their shameless and reckless commitment to the Enterprise. *See, e.g.,* page 4 Subpar. 5; and page 17 at ¶ 61.

90. On January 25, 2023, Cronig, at Hinshaw Law, furthering the underlying scheme extorting Tavares of all properties and rights, under color of law, files, with unclean hands, with Florida Secretary of State (“SUNBIZ”), a sham 2023 Annual Report for Tavares’ hijacked 139 TH, as Manager of 139 TH, and Associate Wolters Kluwer as 139 TH’s Registered Agent, to, *inter alia*, prevent justice. *See, [www.sunbiz.org](http://www.sunbiz.org)*, at Document #L03000029150, on 01/25/2023.

91. On March 6, 2024, at 11:39 a.m., in furtherance of the underlying scheme extorting Tavares of all properties and rights, under color of law, Guimaraes transmits, with unclean hands, via electronic wire, a fraudulent Federal Tax Return, for year ending 12/2023, for Tavares’ hijacked 139 TH, predicated on fabricated forged bogus authority from bad actors in the Republic of Panamá, further money laundering and tax evading the ill-gotten proceeds.

92. On March 18, 2024, Guimaraes, furthering the underlying scheme extorting Tavares of all properties and rights, under color of law, files, with unclean hands, with Florida Secretary of State (“SUNBIZ”), a sham 2024 Annual Report for Tavares’ hijacked 139 TH, as Manager, and Associate Wolters Kluwer as 139 TH’s Registered Agent. *See, [www.sunbiz.org](http://www.sunbiz.org)*, at Document #L03000029150, on 03/18/2024.

93. On April 1, 2024, Cronig, at Hinshaw Law, furthering the underlying scheme extorting Tavares of all properties and rights, under color of law, files, with unclean hands, with Florida Secretary of State (“SUNBIZ”), a sham Amended 2024 Annual Report for Tavares’ hijacked 139 TH, as its Registered Agent, and Guimaraes as Manager, to, *inter alia*, prevent justice. *See, [www.sunbiz.org](http://www.sunbiz.org)*, at Document #L03000029150, on 04/01/2024.

94. This affidavit is based on just a few facts, truths, and record displayed on these ongoing matters, and only demonstrates a small number of violations and the utter and complete disregard for the rule of law by the Enterprise's continuous and ongoing racketeering schemes in the United States of America and elsewhere, further successfully corrupting and subverting the judicial machinery in Florida and elsewhere,<sup>35</sup> presenting a grave and present danger from this powerful Global Criminal Enterprise comprised of reckless and shameless domestic and foreign bad actors that have infiltrated the judicial machinery, banking and real estate systems, operating unchecked corrupting and subverting our democracy predicated on the constitution and the rule of law<sup>36</sup> to further their criminal schemes, seriously threatening the United States of America's national security and democracy predicated on the rule of law and constitutional rights. As the record shows, the Enterprise, financed by their criminal schemes in the United States of America, and elsewhere they are freely operating, is actively and systematically corrupting and subverting our democratic institutions in order to perpetuate and increase their powers trumping law and order, and U.S. citizens constitutional fundamental rights, while hiding their identities and moneys with shell companies and using Fake actors to execute their unlawful powers.

For more updated and additional detailed information about Enterprise's schemes, please visit [www.FBIknows.com](http://www.FBIknows.com) at Schemes #1 through #10, as more information and evidence of the Enterprise is being updated, as they become available. See, [www.FBIknows.com](http://www.FBIknows.com).

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<sup>35</sup> The Enterprise is also systematically perpetrating schemes against Tavares' business in Brazil in order to completely destroy and silence Tavares from continuing to expose their Global Alliance of major schemes.

<sup>36</sup> The Enterprise and its Global Alliance of bad actors understand and know that, by corrupting and subverting the judicial machinery in jurisdictions they operate, as shown here in the United States of America, they are not only protected from prosecution for their major crimes, but also they are able to intimidate and silence victims and law enforcement, to further freely engage and profit from additional rackets upon the courts using Associate attorneys and Associate judges nominated by the Enterprise to further schemes, all owning allegiance to the Enterprise and not to the United States of America, nor to the Constitution, thus strengthening their evil powers and wealth of the Enterprise, allowing them to hijack powers in the highest level in the United States of America.

## CONCLUSION

Based on the foregoing, on my knowledge, experience in these matters, and the record displayed in these matters, the truth, and facts set forth in this affidavit, I can affirm that the Criminal Enterprise's associates, intentionally and knowingly, have caused, caused to be committed, and continuing to this date, are causing to commit and causing to be committed, more than 1.370 violations - and counting- of State and Federal Statutes upon civil proceedings before Florida courts, *inter alia*, of, Title 18, U.S.C., §241 (Conspiracy Against Rights); § 242 (Violations of Rights under color of law); 371 (Major Frauds Against the United States; §§ 1341, 1343, 1346, 1349 (Conspiracy to, and Wire and Mail Honest Service Fraud), §1344 (Bank Fraud); §1951 (Extortion of Properties and Rights of Tavares – Hobbs Act); §1956 (Money Laundering of proceeds generated through criminal activity); § 1957 (engaging in monetary transactions in property derived from specified unlawful activity); § 1961 *et seq.* (RICO), and Title 42, U.S.C., § 1985 (Conspiracy against Tavares Rights); and Florida Statutes, Sections 837.021 (Perjury by Contradictory Statements); 837.06 (Perjury False Statements in Writing to Mislead Public Servant); 837.12 (Perjury); 895.03 (Florida RICO); and 896.101 (Florida Money Laundering Act); and Florida Rules of Professional Conduct, successfully and continuously to this date, corrupting and subverting the judicial and political machinery in Florida in furtherance of schemes, thus rendering decisions by the subverted Florida courts in Tavares' nine sham Related Cases patently unlawful, invalid, and forever null and void. The Enterprise's successful corruption and subversion of Florida courts, and elsewhere and their powerful Transnational Alliance presents a clear and present danger to the United States of America and other countries where they operate, undermining democracy predicated on the rule of law, in a clear and direct attack to the United States of America, and its national security. See, [www.FBIknows.com](http://www.FBIknows.com).

## 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:

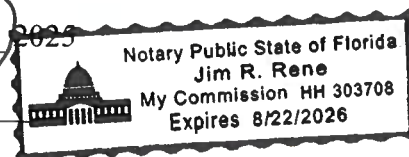
FURTHER AFFIANT SAYETH NAUGHT

By: \_\_\_\_\_

Charles A. Tavares, Individually

Sworn to and subscribed before me on this 31<sup>st</sup> day of August, 2025

Signature of Notary Public



Charles A. Tavares Produced Identification: Florida Drivers' License #T162-141-65-025-1.