

The Systematic Extortion of Rights Under Color of Law in the Styled Case *Deutsche Bank vs. Charles Tavares*, Case No. 2012-20197-CA-30, in Miami-Dade County, Florida

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
1	May 22, 2012	U. S. CODE TITLE 18	ALLAN LESTER LANGER THE CRIMINAL ENTERPRISE DEUTSCHE BANK
2		§ 371 Conspiracy to Defraud the USA &	
3		§ 241 Conspiracy Against Rights &	
4		§242 Deprivation of Rights Under Color of Law &	
5		§ 1346 Scheme/Artifice to Defraud &	
6		§ 1961 <i>et seq.</i> – RICO & FLORIDA CODE OF JUDICIAL CONDUCT Canons 1; 2; and 3	

On or about May 22, 2012, Charles Tavares (“Tavares”), after years of tortious businesses interference with an advantageous relationship, and continuing with related schemes of sham cases against Tavares and his businesses, by Tavares’s longtime attorneys and their Associates – unbeknownst to Tavares at the time, Associates of a Criminal Enterprise, as part of an underlying scheme to deprive, steal, and extort, under color of law, Tavares of all properties and rights upon subverted courts of law in Florida, Deutsche National Bank & Trust (“Deutsch Bank”), files a foreclosure suit (“Deutsche Suit”), to foreclose Tavares’s property at 520 Brickell Key Drive, Unit A-1511, Miami, Florida 33131 (“BK-1” Property”), in the styled-action *Deutsche National Bank & Trust vs. Charles Tavares* Case No. 2012-20197-CA-30, Deutsche Bank File No. F11006286, before the Eleventh Judicial Circuit for and in Miami-Dade County, Florida (“Miami Courts”). See Record. As part of the underlying ongoing scheme upon the subverted Miami Courts, the Deutsche Suit is intentionally assigned to, and willfully accepted by, corrupt judge Allan Lester Langer a.k.a. Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), already perpetrating brazen barbaric violations of law, the constitution, rights, and Florida Code of Judicial Conduct, Canons 1, 2, and 3, on three (03) sham Related Cases upon Miami Courts, against Tavares, see, *Bridgeloan Investors, Inc. vs. Charles Tavares, et al., vs. BNY Mellon* Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case); *BNY Mellon vs. Charles Tavares* Case No. 2010-26864-CA-30 (“BNY” Suit); and, *Brickell Commerce Plaza, Inc., and The Car Wash Concept, Inc. vs. Charles Tavares* Case No. 2011-29624-CA-30 (“BCP/Car Wash Case”) (collectively, “Related Cases”). See [Tavares Affidavit of 11/27/2022](#). At all relevant times, Judge Langer, the Miami Courts, Deutsche Bank, and the Criminal Enterprise, knew, and had to know that, among other things, the record displayed in this matter, and in the Related Cases, showed a brazen criminal scheme by the Criminal Enterprise and Associates using their Florida Bar licenses and judicial authority as guise to deprive, steal, and extort, under color of law, Tavares and Tavares’s Companies of properties and rights upon subverted sham proceedings, and further “legalizing” the scheme, money laundering the ill-gotten proceeds from the Miami Courts’s schemes, further defrauding the United States of America, the State of Florida, and citizens, of, among other violations, Title 18, U.S.C., §§ 371, 241, 242, 1346, and 1961, *et seq.*; and, U.S. Const., 14th Amend., Due Process Clause, and Rights. See Title 18 United States Code, Sections 371; 241, 242, 1346, and 1961, *et seq.*, United States Constitution, Fourteenth Amendment, Due Process Clause, and Rights.

COUNTS

Count 1- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

Count 2- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

Count 3- Judge Langer, and other officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

Count 4- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

Count 5 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

Count 6 –Judge Langer, and other officers of the courts implicated, knowingly and intentionally, use their judicial powers as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, systematically depriving, extorting, and violating Tavares’ rights, of constitutionally guaranteed rights, and due process, to further a known brazen scheme depriving and extorting Tavares of his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. *See Fla. Code Jud. Conduct.*

THE DEUTSCHE BANK SCHEME TO EXTORT & DEPRIVE TAVARES UNDER COLOR OF LAW TO FURTHER THE CRIMINAL ENTERPRISE'S UNDERLYING SCHEME EXTORTING TAVARES OF ALL HIS PROPERTIES

In 1992, as Tavares was working with real estate developer Eduardo Avila ("Avila") in the Saint Louis Condominium Project on Brickell Key, Miami, Florida, Avila introduces his attorneys at Freeman Haber, *et al.* ("FHR&S"), Freeman, Haber, Slosbergas, Rojas, Fine, and Nicholas Stanham ("Stanham") (Florida Bar No. 38.822), so Tavares can work with them on Tavares's Real Estate Projects and Funds.

Unbeknownst to Tavares, FHR&S's attorneys are criminals, knowingly and intentionally, in reckless disregard for the law, using their Florida Bar licenses as guise to commit crimes, among other things, tax frauds, tax-free portfolio bond frauds, corporate frauds and schemes, intercontinental money laundering of illicit funds through the United States of America, and elsewhere. In May 16, 1996, FHR&S, together with reckless Brazilian businesspersons, Joseph Horn ("Horn"), and Ricardo Eichenwald ("Eichenwald"), incorporate Bridgeloan Investors, Inc., a Florida corporation ("BRIDGELoAN") (Tax Id. #65-0665516) (SUNBIZ Document #P96000042015), to be another conduit of their underlying criminal schemes, and loan extortion¹ by secretly entrapping the unsuspecting² clients to be deprived of their assets and rights. Tavares, through very hard work, ingenuity, and vision, developed a very successful real estate investment, development, and management, with hundreds of close wealthy investors from Brazil. As Tavares did dozens of very successful projects and deals, and owned many prized and valued real estate assets,³ Tavares became a high value target, and, unsuspecting, continued using FHR&S's attorneys, which in turn, as part of their underlying scheme to extort, referred Tavares to other implicated attorneys Associates of the Criminal Enterprise, for example, Thomas Ralph Lehman ("Lehman") (Florida Bar No. 351.318), an Associate specialized in extorting unsuspecting clients in bankruptcy proceedings, after the other Associates cause the clients' business to fail. Then, around 2005, Tavares's attorneys Freeman, Haber, Rojas, Stanham, and others implicated, started a secret and systematic scheme of torts against Tavares's Companies, interfering on Tavares's deals to sell Tavares's Properties, directly interfering with Tavares's investors and partners on all companies, in order to sabotage the business and Tavares's relationship with his investors, starting the scheme to extort Tavares of properties and rights, under color of law, filing the first⁴ bogus suit, followed by a barrage of sham suits, including the Deutsche Bank Suit to deprive and extort Tavares of all properties. *See Record.*

¹ The Criminals at FHR&S, split into different law firms, in order to disguise their association, *e.g.*, Slosbergas and Fine, open their own separate law firms, but continue, *de facto*, their Criminal Enterprise Association.

² The implicated attorneys, using their Florida Bar licenses as guise to commit crimes against their own clients looking for real estate purchase and development financing, refer the clients to alleged "third-party" lenders, *e.g.*, BRIDGELoAN, in order to start the scheme upon the unsuspecting clients/victims. Then, they start torts, by interfering on the victims' deals and businesses, causing financial duress to the business while exchanging confidential information about the client/victim to other Associates, eventually causing the business's failure, and moving to the next stage of the extortion under color of law, upon subverted Miami Courts, presided by judges associated with the Criminal Enterprise, then successfully "legalizing" their criminal schemes. *See Record.*

³ Among other real estate assets owned by Tavares and Tavares's Companies, the Brickell Village Buildings' Property, the 9 Acres riverfront Miami River Park Marina's Property, the Brickell Commerce Plaza & Car Wash's Property, the 29 Acres 139 TH Avenue S.W. 8 TH Street, LLC's Property, with a combined current adjusted value, for the land value only, of over \$300 million. *See Record.*

⁴ *See*, the Bridgeloan Investors, Inc. vs. Charles Tavares; Miami River Park Marina, Inc.; Brickell Village One, LLC; 2147 S.W. 8 Street, LLC; BNY Mellon ("BRIDGELoAN" Case No. 2009-93058-CA-30). *See* [Tavares Sworn Affidavit](#).

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

The Criminal Enterprise, after secretly entrapping Tavares and Tavares's Companies in the underlying scheme with torts and businesses interference, and surrounding Tavares by Associates, launch the scheme to deprive and extort Tavares, under color of law, of all of Tavares's Properties and Rights in Nine (09) Related Cases, upon subverted courts, presided by the same Associates of the Criminal Enterprise, *e.g.*, corrupt judge Allen Lester Langer ("Judge Langer") (Florida Bar No. 137.828), that, knowingly and intentionally, in reckless disregard to the truth and the law, systematically, to further the criminal scheme, deprives and extorts Tavares of properties and rights, see the BRIDGELoAN Case No. 2009-93058- CA-30; BNY Mellon Suit Case No. 2010-26864-CA-30; Brickell Commerce/ Car Wash Case No. 2011-29624-CA-30; and, Deutsche Bank Case No. 2012-20197-CA-30, followed by corrupt Judge Norma S. Lindsey, on same Related Cases ("Judge Lindsey") (Florida Bar No. 994.812). See Record.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
7	September 14, 2012	U. S. CODE TITLE 18	DEUTSCHE BANK KIMBERLEY L. GARNO JUSTIN J. KELLEY RONALD R. WOLFE & ASSOCIATES THE CRIMINAL ENTERPRISE ALLAN LESTER LANGER
8		§ 371 Conspiracy to Defraud the USA &	
9		§ 241 Conspiracy Against Rights &	
10		§242 Deprivation of Rights Under Color of Law &	
11		§ 1346 Scheme/Artifice to Defraud &	
12		§ 1961 <i>et seq.</i> – RICO & FLORIDA CODE OF JUDICIAL CONDUCT Canons 1; 2; and 3	

On or about September 14, 2012, the subverted Miami Courts, presided by corrupt judge Allan Lester Langer a.k.a. Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), enters a bogus Default Judgment (“Default Judgment”) against Charles Tavares (“Tavares”), in the in the styled-action *Deutsche National Bank & Trust vs. Charles Tavares* Case No. 2012-20197-CA-30 (“Deutsche Suit”) Deutsche Bank File No. F11006286, before the Eleventh Judicial Circuit for and in Miami-Dade County, Florida (“Miami Courts”). The Default Judgment is entered predicated on a bogus Return of Constructive Service upon Tavares, purportedly served upon Tavares by Deutsche Bank’s law firm, Ronald R. Wolfe & Associates, P.L. (“Ronald Wolfe”), having attorneys Kimberley L. Garno (“Garno”) (Florida Bar No. 84.538), and Justin J. Kelley (“Kelley”) (Florida Bar No. 32.106). As it is shown on an Order of August 27, 2013 Vacating the Default Judgment (“Vacating Default”), by Judge Jaqueline Hogan Scola (“Judge Scola”) (Florida Bar No. 350.869), Tavares was never served the Deutsche Suit until August 27th, 2013, as Deutsche Bank purportedly recklessly served Tavares on various known incorrect addresses, see Deutsche Bank’s Affidavit of Diligent Search and Inquiry of July 5, 2012. The record displayed in this matter, and in the Related Cases, known to all parties hereunto, shows a brazen scheme to deprive and extort Tavares, under color of law, of all properties and rights. Concurrently, Judge Langer, together with other implicated Associates of the Criminal Enterprise, continue depriving and extorting Tavares of properties and rights in the ongoing Related Cases, to destroy Tavares financially, to further silence Tavares and cover up the brazen scheme upon the Miami Courts by officers of the courts. See [Tavares Affidavit of 11/27/2022](#).

COUNTS

Count 7- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

Count 8- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

Count 9- Judge Langer, and other officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

Count 10- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

Count 11 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

Count 12 –Judge Langer, and other officers of the courts implicated, knowingly and intentionally, use their judicial powers as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, systematically depriving, extorting, and violating Tavares’ rights, of constitutionally guaranteed rights, and due process, to further a known brazen scheme depriving and extorting Tavares of his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. *See Fla. Code Jud. Conduct.*

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
13	From December 2012 Through December 3, 2013	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	NORMA SHEPARD LINDSEY DEUTSCHE BANK
14		§ 241 Conspiracy Against Rights &	KIMBERLEY L. GARNO JUSTIN J. KELLEY
15		§242 Deprivation of Rights Under Color of Law &	J. BENNETT KITTERMAN BRANDON C. SZYMULA RONALD R. WOLFE & ASSOCIATES
16		§ 1346 Scheme/Artifice to Defraud &	SHAIB YARIEL RIOS BROCK & SCOTT, PLLC
17		§ 1961 <i>et seq.</i> – RICO &	ARIEL ACEVEDO LIEBLER GONZALEZ PORTUNDO THE CRIMINAL ENTERPRISE
18		FLORIDA BAR RULES OF CONDUCT Misconduct – Rule 4-8.4 (a)(b)(c)(d) &	
19		FLORIDA CODE OF JUDICIAL CONDUCT Canons 1; 2; and 3	

From December 2012, upon the retirement of corrupt judge Allan Lester Langer a.k.a. Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), depriving and extorting Charles Tavares (“Tavares”), under color of law, as part of an underlying scheme by the Criminal Enterprise, on all four (04) of Tavares’s civil cases (“Related Cases”) before the Eleventh Judicial Circuit Court in and for Miami-Dade County, Florida (“Miami Courts”), the Criminal Enterprise directs the Miami Courts to intentionally and knowingly assign all Tavares’s Related Cases to judge Norma S. Lindsey (“Judge Lindsey”) (Florida Bar No. 994.812), which, as part of the scheme, willfully accepts to preside the Related Cases on a known and intentional conflict of interest, as wife to attorney Harold Eugene Lindsey III (“Lindsey III”) (Florida Bar No. 130.338), for The Bank of New York Mellon (“BNY Mellon”), directly implicated in the deprivation and extortion of Tavares’s properties and rights – with a value in excess of \$50 million, in the sham case, *Bridgeloan Investors, Inc. vs. Charles Tavares, et al, vs. BNY Mellon* Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in direct and known violation of, among other things, Florida Code of Judicial Conduct, Canons 1, 2, and 3; and, Title 18, U.S.C., §§ 371, 241, 242, 1346, and 1961, *et seq.* See [Tavares Affidavit of 11/27/2022](#).

Among other officers of the courts implicated and/or with knowledge of the brazen scheme upon the sham proceedings, initially presided by implicated Judge Langer, and then, by implicated judge Lindsey, the record shows, among others; Kimberly L. Garno (“Garno”) (Florida Bar No. 84.538); Justin J. Kelley (“Kelley”) (Florida Bar No. 32.106); J. Bennett Kitterman (“Kitterman”) (Florida Bar No. 98.636); Brandon C. Szymula (“Szymula”) (Florida Bar No. 98.803); Ronald R. Wolfe & Associates, P.A. (“Ronald Wolfe”); Shaib Y. Rios (“Rios”) (Florida Bar No. 28.316); Brock & Scott, PLLC (“Brock & Scott”); Ariel Acevedo (“Acevedo”); Liebler, Gonzalez & Portundo (“Liebler Portundo”); Administrative judge Jennifer D. Bailey (“Judge Bailey”) (Florida Bar No. 386.758); and, Miami Courts Chief Judge Bertila Ana Soto (“Judge Soto”), all, knowingly violating, among other things, their sworn Oath. See Sworn [Oath](#) of Admission to the Florida Bar.

JUDGE LINDSEY'S RECUSAL AFTER A YEAR OF INTENTIONAL CONFLICT OF INTEREST SHOWING BIAS, PREJUDICE AND VIOLATIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW TO FURTHER A SCHEME BY THE CRIMINAL ENTERPRISE

"IN THE COUNTY[*] COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CIVIL DIVISION CASE NO. 09-93058 CA-01 (30)

Bridgeloan Investors, Inc., a Florida Corp.,
Plaintiff(s),

FILED FOR RECORD 2013 DEC-4 PM 2:25

vs.

Miami River Park Marina, Inc., a Florida Corp., Brickell Village One, LLC,
a Florida Corporation, 2147 S.W. 8th Street, LLC, a Florida Corp.,
Charles Tavares, individually,
David Plummer and Associates, Inc., a Florida Corp., and the City of Miami,

Defendant(s)

vs.

MUNB Loan Holdings, LLC, a Delaware Limited Liability Company,
Intervenor.

ORDER OF RECUSAL

The undersigned Judge hereby recuses herself from any further proceedings in the above-styled case, as the law firm of Katz Barron Squitero & Faust is counsel of record.

The Clerk of the Court is ordered to transfer this matter to the appropriate Administrative Judge for re-assignment.

DONE AND ORDERED in Miami-Dade County, Florida this 3 day of December, 2013.

/s/ Norma S. Lindsey

Norma S. Lindsey – Circuit Court Judge

Reassigned by Blind

Filing Section 32

Per Order Adm. Judge

This Date of Dec 4 2013

ORIGINAL

JUDGE NORMA S. LINDSEY

Copies furnished to all parties:

All Parties." See Record Case No. 2009-93058-CA-30, Miami-Dade County, Florida.

* Judge Lindsey erroneously uses the "County Court" form instead of the proper "11th Judicial Circuit Court", as the case is upon the Circuit Court, and not the County Court, and willfully omits the fact that the reason of her recusal is that her husband, attorney Harold Eugene Lindsey III ("Lindsey III") (Florida Bar No. 130.338) at Katz Barron Faust Squitero ("Katz Barron"), represents The Bank of New York Mellon ("BNY Mellon"), and he is implicated in the deprivation and extortion of \$50 million of Tavares and Tavares's Companies, under color of law, in the *Bridgeloan Investors, Inc. v. Charles Tavares, et. al., v. BNY Mellon*, Case No. 2009-93058-CA-30. See Record.

TRANSFER ORDER ON RECUSAL OF JUDGE LINDSEY AFTER A YEAR OF INTENTIONAL CONFLICT OF INTEREST SHOWING BIAS, PREJUDICE AND VIOLATIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW TO FURTHER A SCHEME BY THE CRIMINAL ENTERPRISE

“In the General Jurisdiction Division Case No. 09-93058-CA-01
In the 11th Judicial Circuit, In and for Miami-Dade County, Florida

Bridgeloan Investors, Inc.,
v.
Miami River Park Marina, Inc., [*]

TRANSFER ORDER ON RECUSAL

This matter came before the undersigned administrative judge upon the recusal of Division 30. The case has been blind-filed by the Clerk of the Court to Division 32, and all further proceedings shall be had before that judge.

Done and Ordered at Miami-Dade County, Florida this 5 day of December 2013.

/s/ Jennifer D. Bailey

Jennifer D. Bailey – Administrative Judge
General Jurisdiction Division

*Reassigned by Blind
Filing Section 32
Per Order Adm. Judge
This Date of Dec 4 2013*

*ORIGINAL
JUDGE JENNIFER D. BAILEY*

CC:
counsel of record”. See Record Case No. 2009-93058-CA-30, Miami-Dade County, Florida.

* Judge Jennifer Drechsel Bailey (“Judge Bailey”) (Florida Bar No. 386.758), willfully omits the true and correct styled-action, *Bridgeloan Investors, Inc. v. Charles Tavares, Brickell Village One, LLC, 2147 S.W. 8 Street, LLC, and Miami River Park Marina, Inc. v. MUNB Loan Holdings, LLC* a.k.a. The Bank of New York Mellon. See Record Case No. 2009-93058-CA-30.

**JUDGE LINDSEY’S RECUSAL AFTER A YEAR OF CONFLICT OF INTENTIONAL INTEREST SHOWING BIAS,
PREJUDICE AND VIOLATIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW TO
FURTHER A SCHEME BY THE CRIMINAL ENTERPRISE**

“IN THE COUNTY[*] COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CIVIL DIVISION CASE NO. 09-93058 CA-01 (30)

Deutsche Bank National Trust Co.,
Plaintiff(s),

FILED FOR RECORD

vs.

Charles Tavares,
Defendant(s)

ORDER OF RECUSAL

The undersigned Judge hereby recuses herself from any further proceedings in the above-styled case.

The Clerk of the Court is ordered to transfer this matter to the appropriate Administrative Judge for re-assignment.

DONE AND ORDERED in Miami-Dade County, Florida this 5 day of December, 2013.

/s/ Norma S. Lindsey

Norma S. Lindsey – Circuit Court Judge

Copies furnished to all parties:

All Parties”. See Record Case No. 2012-20197-CA-30, Miami-Dade County, Florida.

* Judge Lindsey uses the “County Court” form instead of the proper “11th Judicial Circuit Court”, as the case is upon the Circuit Court and not the County Court. See Record.

TRANSFER ORDER ON RECUSAL OF JUDGE LINDSEY AFTER A YEAR OF INTENTIONAL CONFLICT OF INTEREST SHOWING BIAS, PREJUDICE AND VIOLATIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW TO FURTHER A SCHEME BY THE CRIMINAL ENTERPRISE

“In the General Jurisdiction Division Case No. 12-20197-CA-01
In the 11th Judicial Circuit, In and for Miami-Dade County, Florida

Deutsche Bank Nat’l Trust Co.,
v.
Charles Tavares

TRANSFER ORDER ON RECUSAL

This matter came before the undersigned administrative judge upon the recusal of Division 30. The case has been blind-filed by the Clerk of the Court to Division 42, and all further proceedings shall be had before that judge.

Done and Ordered at Miami-Dade County, Florida this 5 day of December 2013.

/s/ Jennifer D. Bailey

Jennifer D. Bailey – Administrative Judge
General Jurisdiction Division

ORIGINAL

JUDGE JENNIFER D. BAILEY

CC:
counsel of record.” See Record Case No. 2012-20197-CA-30, Miami-Dade County, Florida.

JUDGE LINDSEY'S RECUSAL AFTER A YEAR OF CONFLICT OF INTENTIONAL INTEREST SHOWING BIAS, PREJUDICE AND VIOLATIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW TO FURTHER A SCHEME BY THE CRIMINAL ENTERPRISE

"IN THE COUNTY[*] COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CIVIL DIVISION CASE NO. 09-93058 CA-01 (30)

Brickell Commerce Plaza, Inc.,
Plaintiff(s),

FILED FOR RECORD 2013 DEC-10 PM 2:58

vs.

Charles Tavares, an individual,
Defendant(s)

ORDER OF RECUSAL

The undersigned Judge hereby recuses herself from any further proceedings in the above-styled case.

The Clerk of the Court is ordered to transfer this matter to the appropriate Administrative Judge for re-assignment.

DONE AND ORDERED in Miami-Dade County, Florida this 10 day of December, 2013.

/s/ Norma S. Lindsey

Norma S. Lindsey – Circuit Court Judge

Reassigned by Blind

Filing Section 31

Per Order Adm. Judge

This Date of Dec 10 2013

PHYLLIS PROCTOR

ORIGINAL

JUDGE NORMA S. LINDSEY

Copies furnished to all parties:

All Parties.” See Record Case No. 2011-29624-CA-30, Miami-Dade County, Florida.

* Judge Lindsey uses the “County Court” form instead of the proper “11th Judicial Circuit Court”, as the case is upon the Circuit Court and not the County Court. See Record.

TRANSFER ORDER ON RECUSAL OF JUDGE LINDSEY AFTER A YEAR OF INTENTIONAL CONFLICT OF INTEREST SHOWING BIAS, PREJUDICE AND VIOLATIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW TO FURTHER A SCHEME BY THE CRIMINAL ENTERPRISE

“In the General Jurisdiction Division Case No. 11-29624-CA-01
In the 11th Judicial Circuit, In and for Miami-Dade County, Florida

Brickell Commerce Plaza, Inc.,

FILED FOR RECORD 2013 DEC 12 PM 12:40

v.

Charles Tavares

TRANSFER ORDER ON RECUSAL

This matter came before the undersigned administrative judge upon the recusal of Division 30. The case has been blind-filed by the Clerk of the Court to Division 31, and all further proceedings shall be had before that judge.

Done and Ordered at Miami-Dade County, Florida this 11th day of December 2013.

/s/ Jennifer D. Bailey

Jennifer D. Bailey – Administrative Judge
General Jurisdiction Division

ORIGINAL

JUDGE JENNIFER D. BAILEY

CC:

counsel of record

Russell Landy, Esq. – rlandy@dvllp.com

Richard A. Morgan, Esq. – Richard.Morgan@BIPC.com

Charles Tavares – ctavares@bellsouth.net”

See Record Case No. 2012-20197-CA-30, Miami-Dade County, Florida.

JUDGE LINDSEY'S WILLFULL FAILURE TO GRANT TAVARES'S ATTORNEY MOTION TO WITHDRAW IN A DULY SET HEARING OF FEBRUARY 25, 2014, INSTEAD ISSUING A RECUSAL ORDER AFTER FOURTEEN MONTHS OF CONFLICT OF INTEREST SHOWING BIAS, PREJUDICE AND VIOLATIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW TO FURTHER A SCHEME BY THE CRIMINAL ENTERPRISE

"IN THE COUNTY[*] COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CIVIL DIVISION CASE NO. 10-26864 CA-01 (30)

The Bank of New York Mellon
F/k/a The Bank of New York, as Trustee
for the Certificate holders CWALT,
Inc., Alternative Loan Trust 2006-OA21,
Mortgage Pass-Through Certificates,
Series 2006-OA21

FILED FOR RECORD 2014 FEB 25 PM 2:51

Plaintiff(s),

vs.

Charles Tavares, an individual,
Defendant(s)

ORDER OF RECUSAL

The undersigned Judge hereby recuses herself from any further proceedings in the above-styled case.

The Clerk of the Court is ordered to transfer this matter to the appropriate Administrative Judge for re-assignment.

DONE AND ORDERED in Miami-Dade County, Florida this 25 day of February, 2014.

/s/ Norma S. Lindsey

Norma S. Lindsey – Circuit Court Judge

Reassigned by Blind Filing Section 03

Per Order Adm. Judge This Date of 2-25-14 Wanda -----, Deputy Clerk

ORIGINAL JUDGE NORMA S. LINDSEY

Copies furnished to all parties:

All Parties." See Record Case No. 2010-26864-CA-30, Miami-Dade County, Florida.

* Judge Lindsey uses the "County Court" form instead of the proper "11th Judicial Circuit Court", as the case is upon the Circuit Court and not the County Court, after more than fourteen (14) months on a known and intentional conflict of interest, in violation of, *inter alia*, Fla. Code Jud. Conduct, Canons 1, 2, and 3, and Rights, despite Tavares's numerous motions to recuse her, and after she recuses on three (03) other Related Cases, upon being first exposed on December 3, 2013, intentionally presiding Tavares's four (04) cases in fatal conflict to further an underlying brazen criminal scheme depriving and extorting Tavares of all properties and rights, under color of law, and viciously and recklessly, staying in the BNY Suit to make sure Tavares and his family is deprived and extorted of their home, to her husband, Harold Eugene Lindsey III ("Lindsey III") (Florida Bar No. 130.338), an attorney for BNY Mellon, all implicated in the underlying brazen scheme extorting Tavares. See Record.

TRANSFER ORDER ON RECUSAL OF JUDGE LINDSEY AFTER FOURTEEN MONTHS OF CONFLICT OF INTEREST SHOWING BIAS, PREJUDICE AND SCHEME BY THE CRIMINAL ENTERPRISE

“In the General Jurisdiction Division Case No. 10-26864-CA-01
In the 11th Judicial Circuit, In and for Miami-Dade County, Florida

Bank of NY Mellon,
v.
Charles Tavares

FILED FOR RECORD 2014 FEB 27 PM 1:33

TRANSFER ORDER ON RECUSAL

This matter came before the undersigned administrative judge upon the recusal of Division 25. [sic*]. The case has been blind-filed by the Clerk of the Court to Division 03, and all further proceedings shall be had before that judge.

Done and Ordered at Miami-Dade County, Florida this 27 day of February 2014.

/s/ Jennifer D. Bailey

Jennifer D. Bailey – Administrative Judge
General Jurisdiction Division

ORIGINAL

JUDGE JENNIFER D. BAILEY

CC:

counsel of record” See Record Case No. 2010-26864-CA-30, Miami-Dade County, Florida.

* The correct Division is 30, and Administrative Judge Jennifer D. Bailey, knew at all relevant times that, Judge Lindsey is presiding all of Tavares’ civil cases before the Miami Courts in an intentional impermissible fatal conflict of interest, with bias and prejudice against Tavares, as wife to The Bank of New York Mellon’s (“BNY Mellon”) attorney Eugene Harold Lindsey III (“Lindsey III”) (Florida Bar No. 130.338), at Katz Barron Faust & Squitiero (“Katz Barron”), implicated in the underlying schemes extorting Tavares, and in reckless disregard for the law, the constitution, to the truth, to her duties as Administrative duties, and to Tavares’s repeated motions to disqualify Judge Lindsey for her brazen systematic violations of law, the constitution, and Tavares’ rights, knowingly and intentionally, fails to stop the systematic known deprivation and extortion under color of law, ongoing for years, in violation of Florida’s Code of Judicial Conduct, Canons 1, 2, and 3. See Record.

COUNTS

Count 13- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

Count 14- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

Count 15- Judge Lindsey, and other officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

Count 16- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

Count 17 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

Count 18 –Judge Lindsey, and other officers of the courts implicated, knowingly and intentionally, use their judicial powers as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, systematically depriving, extorting, and violating Tavares’ rights, of constitutionally guaranteed rights, and due process, to further a known brazen scheme depriving and extorting Tavares of his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. *See* Florida Code of Judicial Conduct.

Count 19 – Deutsche Bank attorneys, and other Perpetrators implicated, as officers of the courts, knowingly and intentionally use their Florida Bar license as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, repeatedly making patently false statements in writing to mislead the Miami Court to falsely incriminate, steal, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
20	October 3, 2013	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	NORMA SHEPARD LINDSEY DEUTSCHE BANK
21		§ 241 Conspiracy Against Rights &	KIMBERLEY L. GARNO JUSTIN J. KELLEY
22		§242 Deprivation of Rights Under Color of Law &	J. BENNETT KITTERMAN BRANDON C. SZYMULA
23		§ 1346 Scheme/Artifice to Defraud &	RONALD R. WOLFE & ASSOCIATES SHAIB YARIEL RIOS
24		§ 1961 <i>et seq.</i> – RICO &	BROCK & SCOTT, PLLC THE CRIMINAL ENTERPRISE
25		FLORIDA BAR RULES OF CONDUCT Misconduct – Rule 4-8.4 (a)(b)(c)(d) &	
26	FLORIDA CODE OF JUDICIAL CONDUCT Canons 1; 2; and 3		

On or about October 3, 2013, implicated judge Norma S. Lindsey (“Judge Lindsey”) (Florida Bar No. 994.812), holds, as part of the ongoing scheme depriving and extorting, under color of law, Tavares of properties and rights upon subverted Miami Courts, a hearing on the *Deutsche National Bank & Trust vs. Charles Tavares*, Case No. 2012-20197-CA-30 (“Deutsche Suit”), Deutsche Bank File No. F11006286, attended by Deutsche Bank’s attorney Shaib Y. Rios (“Rios”) (Florida Bar No. 28.316); Brock & Scott, PLLC (“Brock & Scott”), file #13-F03211, in a date and time they all knew Tavares is not available and could not attend it. See Record. On or about November 25, 2013, Rios at Brock & Scott, files the Original Transcript for the October 3, 2013 hearing on Plaintiff’s Motion to Continue Trial, showing, among other things, that, presiding Judge Lindsey, Rios, Brock & Scott, and other officers of the Miami Courts knew – and had to know, of the systematic violations of due process and rights by them against Tavares, as part of a brazen ongoing scheme depriving and extorting Tavares of properties and rights, under color of law. See E-Filing 11/25/2013 at 4:24 P.M.

COUNTS

Count 20- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

Count 21- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. See, e.g., U.S. Const., Amend. XIV.

Count 22- Judge Lindsey, and other officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

Count 23- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

Count 24 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

Count 25 – Deutsche Bank attorneys, and other Perpetrators implicated, as officers of the courts, knowingly and intentionally use their Florida Bar license as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, repeatedly making patently false statements in writing to mislead the Miami Court to falsely incriminate, steal, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

Count 26 –Judge Lindsey, and other officers of the courts implicated, knowingly and intentionally, use their judicial powers as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, systematically depriving, extorting, and violating Tavares' rights, of constitutionally guaranteed rights, and due process, to further a known brazen scheme depriving and extorting Tavares of his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Florida Code of Judicial Conduct.

TRANSCRIPT OF DEUTSCHE BANK’S HEARING HELD BY JUDGE LINDSEY TO WILLFULLY DEPRIVE TAVARES OF RIGHTS AND PROPERTIES UPON SUBVERTED COURT PROCEEDINGS

“Page 1

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CASE NO. 12-20197-CA-30

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE FOR THE CERTIFICATE HOLDERS OF
ISAC 2006-3 MORTGAGE PASSTHROUGH
CERTIFICATES, SERIES 2006-3

Plaintiff,

v.

CHARLES TAVAREAS, et al,

Defendant.

_____ /

PROCEEDINGS HAD TAKEN PLACE BEFORE THE HONORABLE NORMA LINDSEY,
CIRCUIT COURT JUDGE, PURSUANT TO NOTICE

OCTOBER 3, 2013

11:12 A.M. to 11:15 A.M.

73 WEST FLAGLER STREET, ROOM 804, MIAMI, FLORIDA 33128

REPORTED BY: GABRIELA LACAYO, COURT REPORTER – NOTARY PUBLIC, STATE OF FLORIDA
UNIVERSAL COURT REPORTING, INC. – www.universalcourtreporting.com (877)291-3376

Page 2

APPEARANCES OF COUNSEL

ON BEHALF OF PLAINTIFF:

BROCK & SCOTT PLLC

SHAIB YARIEL RIOS, ESQ.

1501 NORTHWEST 49 TH STREET, SUITE 200 - FORT LAUDERDALE, FLORIDA 33309

(954) 618-6955

sahib.rios@brockandscott.com

Page 3

THE COURT: Do you have your motion notice of hearing?

MS. RIOS: Thank you, Judge. I apologize, Your Honor, I wrote on the copy that I have.

THE COURT: Let’s see what you have here. Okay. I’ve reviewed the docket, the plaintiff’s motion to continue trial is granted.

MS. RIOS: I’m sorry, Your Honor. And, actually, the reason why I have the court reporter here, I just wanted to bring your attention that the defendant, Mr. Tavares, has vehemently objected to my appearance today. He stated that he’s unavailable. I would like the Court to know that I believe in substance, we are in agreement that the trial scheduled for next week should not go forward. The plaintiff has tried to move insufficient time prior to trial to have it continued but I did want to bring to your attention, he has filed several motions stating that he’s been denied due process and me --

stating that I was going to proceed on a properly noticed hearing today.

THE COURT: I noted on the docket that you also have something set for October 10th.

page 4

MS. RIOS: He on his own, Your Honor, has set plaintiff's motion to continue trial next week, Thursday the 10th. So, what I wanted to do was bring all of that to your attention and allow the Court to determine whether the Court would enter the order today or whether the Court would prefer to hear the matter next week on Thursday.

THE COURT: Okay. On your representation that he told you he was unavailable today, let's do it next week and I'll see what he has to say about it.

MS. RIOS: Okay, Your Honor.

THE COURT: All right.

MS. RIOS: Trial was scheduled for the following day, Friday.

THE COURT: All right. Well. Let's just take it up on that day when he's available.

MS. RIOS: Thank you, Your Honor.

THE COURT REPORTER: Will you be ordering the this transcript?

MS. RIOS: I'll wait.

(Hearing concluded at 11:45 a.m.)

CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF MIAMI-DADE

I, GABRIELA LACAYO, certify that I was authorized to and did digitally report and transcribe the foregoing proceedings, page 3 to 4 inclusive, and that the transcript is a true and complete record of my digital notes.

Dated this 3rd day of October, 2013.

/s/ Gabriela Lacayo

Gabriela Lacayo, Court Reporter – Notary Public – State of Florida
Commission No.: FF 46687 – Commission Exp.: 10/11/17." See Record.

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
27	October 10, 2013	<u>U. S. CODE TITLE 18</u>	NORMA SHEPARD LINDSEY DEUTSCHE BANK KIMBERLEY L. GARNO JUSTIN J. KELLEY J. BENNETT KITTERMAN BRANDON C. SZYMULA RONALD R. WOLFE & ASSOCIATES SHAIB YARIEL RIOS BROCK & SCOTT, PLLC ARIEL ACEVEDO LIEBLER GONZALEZ PORTUNDO THE CRIMINAL ENTERPRISE
28		§ 371 Conspiracy to Defraud the USA &	
29		§ 241 Conspiracy Against Rights &	
30		§242 Deprivation of Rights Under Color of Law &	
31		§ 1346 Scheme/Artifice to Defraud &	
32		§ 1961 <i>et seq.</i> – RICO &	
33		FLORIDA BAR RULES OF CONDUCT Misconduct – Rule 4-8.4 (a)(b)(c)(d) & FLORIDA CODE OF JUDICIAL CONDUCT Canons 1; 2; and 3	

On or about October 10, 2013, the subverted Miami Courts, presided by corrupt judge Norma S. Lindsey (“Judge Lindsey”) (Florida Bar No. 994.812), enters, as part of the ongoing scheme, depriving and extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, and to further an underlying scheme depriving, stealing, and extorting all of Tavares’s properties upon the Miami Courts, a sham Order on Plaintiff’s Motion to Continue Trial (“Order to Continue Trial”). See Record for *Deutsche National Bank & Trust vs. Charles Tavares*, Case No. 2012-20197-CA-30 (“Deutsche Suit”), Deutsche Bank File No. F11006286. The Order to Continue Trial –following the subverted Miami Court’s prior sham Order of August 22, 2012 (“Order for Non-Jury Trial of August 22, 2012”), intentionally setting a Non-jury Trial before Tavares was even served the complaint on August 27, 2013 – or about a year before Tavares is initially served the complaint, willfully depriving Tavares of rights to a jury Trial and due process of law, resetting the sham Non-jury Trial for December 6, 2013, or about three (03) months after initial served the complaint, to intentionally deprive Tavares of a proper opportunity to present his defenses, pursue discovery, and due process guaranteed to all citizens, in violation of, among other things, Tavares’s guaranteed rights as a U.S. citizen. See Record. The sham Order to Continue Trial is entered predicated on Deutsche Bank’s Motion to Continue the Non-jury Trial, by, among others, implicated, and/or with knowledge of the brazen schemes depriving and extorting Tavares, by Deutsche Banks and its law firms, Ronald R. Wolfe & Associates, P.L. (“Ronald Wolfe”), having attorneys Kimberley L. Garno (“Garno”) (Florida Bar No. 84.538), and Justin J. Kelley (“Kelley”) (Florida Bar No. 32.106); J. Bennett Kitterman (“Kitterman”) (Florida Bar No. 98.636); Brandon C. Szymula (“Szymula”) (Florida Bar No. 98.803); Ronald R. Wolfe & Associates, P.A. (“Ronald Wolfe”); Shaib Y. Rios (“Rios”) (Florida Bar No. 28.316); Brock & Scott, PLLC (“Brock & Scott”), file #13-F03211; Ariel Acevedo (“Acevedo”); and, Liebler, Gonzalez & Portundo (“Liebler Portundo”). See Record.

JUDGE LINDSEY'S ORDER RESETTNG A NON-JURY TRIAL INTENTIONALLY DEPRIVING TAVARES OF DUE PRODCCESS AND RIGHTS TO FURTHER A SCHEME BY THE CRIMINAL ENTERPRISE

“IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE FOR THE CERTIFICATE HOLDERS OF
CERTIFICATE HOLDERS OF ISAC 2006-3, MORTGAGE
PASSTRHOUGH CERTIFICATES SERIES 2006-3

Plaintiff,

GENERAL JURISDICTION DIVISION
CASE NO. 12-20197-CA-30

**FILED FOR RECORD
2013 OCT 10 PM 12:26**

vs.

CHARLES TAVARES, et al,
Defendant.

ORDER ON PLAINTIFF'S MOTION TO CONTINUE TRIAL

THIS CAUSE having come before the Court on the Plaintiff's Motion to Continue Trial and the Court having heard the argument of parties, having reviewed the file and the Court being otherwise duly advised, it is hereupon,

ORDERED AND ADJUGED:

The Plaintiff's Motion to Continue Trial is hereby GRANTED.

Trial is hereby reset for December 6, 2013 at 9:00 a.m.

DONE AND ORDERED in Chambers at Miami-Dade County, Florida, this 10 day of October, 2013.

By: /s/ Norma S. Lindsey
Norma S. Lindsey, Circuit Court Judge

Copies furnished to:

Shaib Y. Rios, Esq., Brock & Scott, PLLC, Attorney for Plaintiff, 1501 N.W. 49th Street, Suite 200, Ft. Lauderdale, FL 33309

Charles Tavares, Pro Se, 444 Brickell Avenue, Suite 720, Miami, Florida 33131, ctavares@bellsouth.net

Ronald R. Wolfe & Associates, PL, Counsel for Plaintiff, 4919 Memorial Hwy Ste 200, Tampa, Florida 33634-7500, eservice@wolfelawfl.com

Case No. 12-20197-CA-30

File #13-F03211." See Record.

COUNTS

Count 27- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371;

Count 28- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

Count 29- Judge Lindsey, and other officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

Count 30- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

Count 31 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

Count 32 – Rios, and other officers of the court implicated, knowingly and intentionally use his Florida Bar licenses as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, repeatedly making patently false statements in writing to mislead the Miami Court to falsely incriminate, steal, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct.

Count 33 – Judge Lindsey, and other officers of the courts implicated, knowingly and intentionally, use their judicial powers as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, systematically depriving, extorting, and violating Tavares’ rights, of constitutionally guaranteed rights, and due process, to further a known brazen scheme depriving and extorting Tavares of his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Florida Code of Judicial Conduct.

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
34	December 3, 2013	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	NORMA SHEPARD LINDSEY DEUTSCHE BANK KIMBERLEY L. GARNO JUSTIN J. KELLEY J. BENNETT KITTERMAN BRANDON C. SZYMULA RONALD R. WOLFE & ASSOCIATES SHAIB YARIEL RIOS BROCK & SCOTT, PLLC THE CRIMINAL ENTERPRISE
35		§ 241 Conspiracy Against Rights &	
36		§242 Deprivation of Rights Under Color of Law &	
37		§ 1346 Scheme/Artifice to Defraud &	
38		§ 1961 <i>et seq.</i> – RICO &	
39		FLORIDA BAR RULES OF CONDUCT Misconduct – Rule 4-8.4 (a)(b)(c)(d) &	
40		FLORIDA CODE OF JUDICIAL CONDUCT Canons 1; 2; and 3	

On or about December 3, 2013, the subverted Miami Courts, presided by corrupt judge Norma S. Lindsey (“Judge Lindsey”) (Florida Bar No. 994.812), enters, as part of the ongoing scheme depriving and extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, and to further an underlying scheme depriving, stealing, and extorting all of Tavares’s properties upon the Miami Courts, a sham Order Denying Tavares’s Emergency Motion to Stay the Case Pending an Appeal (“Order Denying Tavares’s Emergency Motion to Stay”). See Record for *Deutsche National Bank & Trust vs. Charles Tavares*, Case No. 2012-20197-CA-30 (“Deutsche Suit”), Deutsche Bank File No. F11006286. The Order Denying Staying the Case Pending Appeal before the Third District Court of Appeal (“3DCA”), see Notice of Appeal of November 8, 2013, Recorded at Bk 28908 Pgs 2035 – 2037 CFN 20130897390 on 11/13/2013 at 9:15, Miami-Dade County Clerk Records. Following the subverted Miami Court’s prior sham Orders to deprive Tavares of due process and rights, including, but not limited to, the Order of October 10, 2013, resetting a Non-jury Trial to December 6, 2013, following brazen violations of law, the constitution, and rights by Judge Lindsey, intentionally depriving Tavares of a proper opportunity to present his defenses, pursue discovery, and due process guaranteed to all citizens, in violation of, among other things, Tavares’s guaranteed rights as a U.S. citizen. See Record. The sham Order denying the Emergency Motion to Stay the Case pending the ongoing appeal before the 3DCA, is entered predicated on Judge Lindsey, and others implicated, on furthering the brazen scheme depriving and extorting Tavares, including, but not limited to, by Deutsche Banks and its law firms, Ronald R. Wolfe & Associates, P.L. (“Ronald Wolfe”), having attorneys Kimberley L. Garno (“Garno”) (Florida Bar No. 84.538), and Justin J. Kelley (“Kelley”) (Florida Bar No. 32.106); J. Bennett Kitterman (“Kitterman”) (Florida Bar No. 98.636); Brandon C. Szymula (“Szymula”) (Florida Bar No. 98.803); Ronald R. Wolfe & Associates, P.A. (“Ronald Wolfe”); Shaib Y. Rios (“Rios”) (Florida Bar No. 28.316); Brock & Scott, PLLC (“Brock & Scott”), file #13-F03211.” See Record.

JUDGE LINDSEY'S ORDER DENYING TAVARES'S MOTION TO STAY CASE PENDING AN APPEAL BEFORE THE 3DCA INTENTIONALLY DEPRIVING TAVARES OF DUE PRODCESS AND RIGHTS TO FURTHER A SCHEME BY THE CRIMINAL ENTERPRISE

“IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE FOR THE CERTIFICATE HOLDERS OF
CERTIFICATE HOLDERS OF ISAC 2006-3, MORTGAGE
PASSTRHOUGH CERTIFICATES SERIES 2006-3
Plaintiff,

GENERAL JURISDICTION DIVISION
CASE NO. 12-20197-CA-30

**FILED FOR RECORD
2013 DEC 03 PM 11:46**

vs.

CHARLES TAVARES, et al,
Defendant.

ORDER

THIS CAUSE having come before the Court on Defendant's Emergency Motion to Stay Case Pending Appeal Scheduled for Hearing on December 3, 2013, and the Court having heard the argument of parties, having reviewed the file and the Court being otherwise duly advised, it is hereupon,

ORDERED AND ADJUGED:

The Defendant's Motion is hereby DENIED.

Trial scheduled for December 6, 2013 will proceed as scheduled.

DONE AND ORDERED in Chambers at Miami-Dade County, Florida, this 3 day of December, 2013.

ORIGINAL
JUDGE NORMA S. LINDSEY

By: /s/ Norma S. Lindsey

Norma S. Lindsey, Circuit Court Judge

Copies furnished to:

Shaib Y. Rios, Esq., Brock & Scott, PLLC, Attorney for Plaintiff, 1501 N.W. 49th Street, Suite 200, Ft. Lauderdale, FL 33309

Charles Tavares, Pro Se, 444 Brickell Avenue, Suite 720, Miami, Florida 33131, ctavares@bellsouth.net
Ronald R. Wolfe & Associates, PL, Counsel for Plaintiff, 4919 Memorial Hwy Ste 200, Tampa, Florida 33634-7500, eservice@wolfelawfl.com

Case No. 12-20197-CA-30

File #13-F03211." See Record.

COUNTS

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

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

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

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

Count 38 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

Count 39 – Rios , and other officers of the court implicated, knowingly and intentionally use his Florida Bar licenses as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, repeatedly making patently false statements in writing to mislead the Miami Court to falsely incriminate, steal, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct.

Count 40 – Judge Lindsey, and other officers of the courts implicated, knowingly and intentionally, use their judicial powers as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, systematically depriving, extorting, and violating Tavares’ rights, of constitutionally guaranteed rights, and due process, to further a known brazen scheme depriving and extorting Tavares of his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Florida Code of Judicial Conduct.

COUNTS APROX. DATE VIOLATIONS PERPETRATORS

41	December 4, 2013	U. S. CODE TITLE 18	NORMA SHEPARD LINDSEY CRIMINAL ENTERPRISE
		§ 371 Conspiracy to Defraud the USA &	
42		§ 241 Conspiracy Against Rights &	
43		§242 Deprivation of Rights Under Color of Law &	
44		§ 1346 Scheme/Artifice to Defraud &	
45		§ 1961 <i>et seq.</i> – RICO &	
46		FLORIDA CODE OF JUDICIAL CONDUCT Canons 1; 2; and 3	

On or about December 4, 2013, implicated judge Norma S. Lindsey (“Judge Lindsey”) (Florida Bar No. 994.812), following Charles Tavares’s uncovering, and filing motions,⁵ showing some of the ulterior motives⁶ for Judge Lindsey’s reckless actions and rulings, intentionally and knowingly depriving and extorting, under color of law, Tavares of properties and rights, upon the subverted proceedings in the Eleventh Judicial Circuit in Miami-Dade County, Florida (“Miami Courts”), in violation of law, the constitution, and Tavares’s rights, upon the four (04) Related Cases,⁷ including in this styled-case *Deutsche National Bank & Trust vs. Charles Tavares*, Case No. 2012-20197-CA-30 (“Deutsche Suit”), Deutsche Bank File No. F11006286, finally recuses herself, after a year of known fatal conflict o interest against Tavares in the Deutsche Suit, after Ordering a Non-jury Trial for December 6, 2013, intentionally and knowingly depriving Tavares of due process and rights, to further an underlying known criminal scheme upon the subverted Miami Courts, depriving, stealing, and extorting Tavares of all properties and rights, see [Tavares Sworn Affidavit](#), in violation of, *inter alia*, Title 18, U.S.C., §§ 371, 241, 242, 1346, 1961, et seq., Florida Code of Judicial Conduct, Canons 1, 2, & 3. See Record.

Shameless Judge Lindsey, despite being exposed by Tavares’s Pleadings of December 3, 2013, in reckless disregard for the law, stays on the Related Case, BNY Mellon Suit, until February 25, 2014, in order to make sure Tavares is deprived and extorted, under color of law, of his homestead Penthouse 1, to her implicated husband’s employer BNY Mellon. See The BNY Suit Case No.2010-26864-CA-30.

⁵ See, among other motions filed by Tavares, Defendant’s Emergency Motion to Disqualify the Honorable Norma S. Lindsey from Defendant’s Tavares’ Court Cases Due to Repeated Bias and Discrimination Against Defendant Tavares’s Legal Rights to Due Process under the Constitution and Legal Conflicts with Husband H. Eugene Lindsey III in Case No. 09-93058-CA-30 (“Motion Disqualify Judge Lindsey”). See Record on December 3, 2013.

⁶ Judge Lindsey is wife to the Bank of New York Mellon Bank’s (“BNY Mellon”) attorney Harold Eugene Lindsey III, directly implicated in the ongoing deprivation, stealing, and extortion of more than \$50 million of Tavares and Tavares’s Companies in the *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. BNY Mellon* Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), and is intentionally assigned, and Judge Lindsey intentionally and knowingly accepts to preside all four (04) civil Related Cases depriving and extorting Tavares and Tavares’s Companies, under color of law, of all properties to further the criminal scheme upon subverted courts. See [Tavares Sworn Affidavit](#).

⁷ See, the BRIDGELoAN Case, *BNY Mellon v. Charles Tavares* Case No. 2010-26864-CA-30 (“BNY Mellon” Case); the *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares* (“BCP/Car Wash” Case) Case No. 2011-29624-CA-30; and this Deutsche Bank Suit, Case No. 2012-20197-CA-30. See [Tavares Sworn Affidavit](#).

JUDGE LINDSEY’S RECUSAL AFTER A YEAR OF FATAL CONFLICT OF INTENTIONAL INTEREST SHOWING BIAS, PREJUDICE AND VIOLATIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW TO FURTHER AN UNDERLYING SCHEME BY THE CRIMINAL ENTERPRISE

“IN THE COUNTY[*] COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CIVIL DIVISION CASE NO. 09-93058 CA-01 (30)

Deutsche Bank National Trust Co.,
Plaintiff(s),

FILED FOR RECORD

vs.

Charles Tavares,
Defendant(s)

ORDER OF RECUSAL

The undersigned Judge hereby recuses herself from any further proceedings in the above-styled case.

The Clerk of the Court is ordered to transfer this matter to the appropriate Administrative Judge for re-assignment.

DONE AND ORDERED in Miami-Dade County, Florida this 5 day of December, 2013.

/s/ Norma S. Lindsey

Norma S. Lindsey – Circuit Court Judge

Copies furnished to all parties:

All Parties.” See Record Case No. 2012-20197-CA-30, Miami-Dade County, Florida.

* Judge Lindsey uses the “County Court” form instead of the proper “11th Judicial Circuit Court”, as the case is upon the Circuit Court and not the County Court. See Record.

TAVARES'S MOTION TO DISQUALIFY JUDGE LINDSEY AFTER TAVARES UNCOVERS SOME OF THE ULTERIOR MOTIVES FOR JUDGE LINDSEY'S RECKLESS ACTIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW TO FURTHER A CRIMINAL SCHEME UPON THE SUBVERTED MIAMI COURTS

“IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE FOR THE CERTIFICATE HOLDERS OF
CERTIFICATE HOLDERS OF ISAC 2006-3, MORTGAGE
PASSTRHOUGH CERTIFICATES SERIES 2006-3

Plaintiff,

GENERAL JURISDICTION DIVISION
CASE NO. 12-20197-CA-30

**FILED FOR RECORD
2013 DEC 03 PM 3:25**

vs.

CHARLES TAVARES, et al,
Defendant.

DEFENDANT'S EMERGENCY MOTION TO DISQUALIFY THE HONORABLE NORMA S. LINDSEY FROM
DEFENDANT TAVARES' COURT CASES DUE TO REPEATED BIAS AND DISCRIMINATION AGAINST
DEFENDANT TAVARES' LEGAL RIGHTS TO DUE PROCESS UNDER THE CONSTITUTION AND LEGAL
CONFLICTS WITH HUSBAND H. EUGENE LINDSEY III IN CASE NO. 09-93058-CA-30

The Defendant, Charles Tavares, represented Pro Se, moves this Honorable Court to Disqualify the Honorable Norma S. Lindsey from Defendant Tavares' Cases before the Eleventh Judicial Circuit due to repeated bias, discrimination and denial of Defendant Tavares' legal rights and alleges conflicts presented by the Honorable Norma S. Lindsey's husband, attorney H. Eugene Lindsey III being on opposing side on Case No. 09-93058-CA-30, involving alleged massive organized fraud against Tavares, his companies and the judicial system, as allegations on Motion to Reopen the Case Due to Fraud, filed before the Honorable Norma S. Lindsey on November 14, 2013.

Page 2

Factual and Procedural Background

1. On or about August 27, 2013, Defendant Charles Tavares was first served on the aforesaid foreclosure styled-action.
2. On or about September 13, 2013, Defendant Charles Tavares filed the first "Answer and Affirmative Defenses of Defendant Charles Tavares."
3. Unknown to Defendant Tavares, the Court had already scheduled a Non-Jury Trial set date for about October 11, 2013.
4. Upon Defendant's finding out that a Non-Jury Trial date had already been set, even before Defendant was served on the above styled-action, much less providing Defendant's legal rights to due process under the law, Defendant Tavares vehemently opposed said improper actions, dulling filing a Motion for Sanctions against Plaintiff's attorneys.
5. On or about October 10, 2013, the Court rescheduled a Non-Jury Trial date for December 6, 2013, further denying Defendant's rights to due and legal process.

6. On November 8, 2013, Defendant filed an appeal before the Third District Court of Appeal to restore Defendant's constitutional rights to due legal process and rights, including to, but not limited to proceed with Defendant's Counter Claim, Discoveries and a jury trial, and other legal remedies guaranteed to every Defendant under the Constitution, which Defendant has repeatedly been denied before the Honorable Norma S. Lindsey, as the Court had already set a Non-Jury Trial even before Defendant was served on this foreclosure styled action.

Page 3

7. On November 14, 2013, Defendant filed Motion to Reopen Case No. 09-93058-CA-30 Due to Fraud.

8. On November 26, 2013, Defendant filed an Emergency Motion to Stay the Case pending the Appeal before the Third District Court of Appeal, and hearing was set for December 3, 2013.

9. On December 3, 2013, Defendant's rights to legal due process under the constitution were denied by Honorable Norma S. Lindsey, refusing to allow Defendant's most basic and sacred legal rights under the constitution, to due legal process, a jury trial by its peers pursuant to Rule 1.430 Fla. Civ. R. P., and other legal remedies guaranteed to every Defendant under the constitution.

Effectively, were this a criminal capital case before this same Court's procedural given to Defendant Tavares, a Defendant in a capital criminal case would have been already scheduled to be put to death even before Defendant was served, and afforded legal rights to due process, which is a severe violation of the most and sacred rights to a Defendant under the Constitution.

10. On Case No. 11-29624-CA-30, *Brickell Commerce Plaza, inc. and The Car Wash Concept, Inc. v. Charles Tavares*, before this court presided by the Honorable Norma S. Lindsey, this court has repeatedly stayed the case for over 6 months, in a complete frivolous appeal by Plaintiffs' attorney Peter F. Valori from Damian & Valori, LLP only to unduly delay settlements, adversely affecting Defendant Tavares, as it prevented Defendant Tavares from proceeding with enforcement of settlements, which would have provided financial relief to Defendant, which is in sharp contrast by this Court's actions now denying Defendant's basic legal rights and which raises the questions as to this Court's bias and discriminatory actions against Defendant Tavares, in denying Defendant's rights to legal due process under the constitution, in contrast to this Court's own history.

Page 4

11. Defendant's legal rights have been repeatedly violated and legal due process has been denied and this Court has allowed Plaintiff to act unduly, violating Defendant's constitutional rights, in what would appear to be a Summary Execution in violation of due process and the constitution.

WHEREFORE, the Defendant Charles Tavares, represented Pro Se, demands this Honorable Court disqualifies the Honorable Norma S. Lindsey, for the alleged facts that creates certain fear that Defendant may never receive a fair and impartial trial under these stated facts, as Defendant has already been discriminated and denied it most basic legal rights do far, and undeniable conflicts against Defendant, the case be dismissed and/or allow Defendant's due process and award such other and further relief as this Court deems just and proper.

Dated: December 3, 2013

Respectfully submitted,

/s/ Charles Tavares

Charles Tavares, Pro Se

444 Brickell Avenue, Suite 720 – Miami, Florida 33131

T. (305) 778-0707 E-mail: ctavares@bellsouth.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via Certified US Postal Mail on December 3, 2013, to : DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, C/O Ronald R. Wolfe & Associates, P.L., at 4919 Memorial Highway, Suite 200, Tampa, Florida 33636-7500; Shaib Y. Rios, Esq., Brock & Scott, PLLC at 1501 N.W. 49th Street, Suite 200, Fort Lauderdale, Florida 33309; and, a Courtesy Copy to Honorable Norma S. Lindsey, Presiding Judge at the Miami-Dade County Courthouse at 73 West Flagler Street, Room DCC 804, Miami, Florida 33130; and, the Honorable Chief Judge Bertila Soto, LET Courthouse, 175 N.W. 1st Avenue, Room 3045, Miami, Florida 33128.

/s/ Charles Tavares

Charles Tavares

444 Brickell Avenue, Suite 720 – Miami, Florida 33131

T. (305) 778-0707 E-mail: ctavares@bellsouth.net". See Record.

**JUDGE LINDSEY’S RECUSAL AFTER A YEAR OF INTENTIONAL CONFLICT OF INTEREST SHOWING
BIAS, PREJUDICE AND VIOLATIONS DEPRIVING AND EXTORTING TAVARES UNDER COLOR OF LAW
TO FURTHER AN UNDERLYING SCHEME BY THE CRIMINAL ENTERPRISE**

“In the General Jurisdiction Division Case No. 12-20197-CA-01
In the 11th Judicial Circuit, In and for Miami-Dade County, Florida

Deutsche Bank Nat’l Trust Co.,

v.

Charles Tavares

TRANSFER ORDER ON RECUSAL

This matter came before the undersigned administrative judge upon the recusal of Division 30. The case has been blind-filed by the Clerk of the Court to Division 42, and all further proceedings shall be had before that judge.

Done and Ordered at Miami-Dade County, Florida this 5 day of December 2013.

/s/ Jennifer D. Bailey

Jennifer D. Bailey – Administrative Judge
General Jurisdiction Division

ORIGINAL

JUDGE JENNIFER D. BAILEY

CC:

counsel of record.” See Record Case No. 2012-20197-CA-30, Miami-Dade County, Florida.

COUNTS

Count 41 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371;

Count 42 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

Count 43 - Judge Lindsey, and other officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

Count 44- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

Count 45 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

Count 46 – Judge Lindsey, and other officers of the courts implicated, knowingly and intentionally, use their judicial powers as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, systematically depriving, extorting, and violating Tavares’ rights, of constitutionally guaranteed rights, and due process, to further a known brazen scheme depriving and extorting Tavares of his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. *See* Florida Code of Judicial Conduct.

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
47	May 11, 2015	U. S. CODE TITLE 18	ALLAN LESTER LANGER
48		§ 371 Conspiracy to Defraud the USA &	NORMA SHEPARD LINDSEY
49		§ 241 Conspiracy Against Rights &	JENNIFER DRECHSEL BAILEY
50		§242 Deprivation of Rights Under Color of Law &	VICTORIA SIGLER
51		§ 1346 Scheme/Artifice to Defraud &	GISELA CARDONNE ELY
52		§ 1344 Bank Fraud &	DEUTSCHE BANK
53		§ 1961 <i>et seq.</i> – RICO &	KIMBERLEY L. GARNO
54		FLORIDA BAR RULES OF CONDUCT	JUSTIN J. KELLEY
		Misconduct – Rule 4-8.4 (a)(b)(c)(d) &	J. BENNETT KITTERMAN
		FLORIDA CODE OF JUDICIAL CONDUCT	BRANDON C. SZYMULA
	Canons 1; 2; and 3	RONALD R. WOLFE & ASSOCIATES	
		SHAIB YARIEL RIOS	
		IVAN D. IVANOV	
		MARIA KWAK	
		BROCK & SCOTT, PLLC	
		ARIEL ACEVEDO	
		LIEBLER GONZALEZ PORTUNDO	
		THE CRIMINAL ENTERPRISE	

On or about May 11, 2015, the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), issues a Final Judgment Order (“Judgement”) against Charles Tavares (“Tavares”), foreclosing on Tavares’s property at 520 Brickell Key Drive, Unit A-1511, Miami, Florida 33131 (“BK-1” Property”), predicated on, among other things, a scheme depriving and extorting Tavares of properties and rights, under color of law, with systematic violations of Tavares’s due process and rights in the styled-case *Deutsche National Bank & Trust vs. Charles Tavares*, Case No. 2012-20197-CA-30 (“Deutsche Suit”), Deutsche Bank File No. F11006286, by implicated officers of the courts, as part of an underlying criminal scheme upon the subverted Miami Courts, by a Criminal Enterprise comprised of reckless attorneys and other bad actors, depriving, stealing and extorting Tavares of all properties and rights. See [Tavares Sworn Affidavit](#). The Perpetrators knew and had to know that they were implicated in the brazen scheme depriving and extorting Tavares, under color of law, as the truth, facts, and the record displayed in these matters clearly demonstrated an ongoing scheme upon the Miami Courts. Among other Perpetrators implicated and/or with knowledge of the scheme, are, judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), judge Norma Shepard Linsey (“Judge Lindsey”) (Florida Bar No. 994.812), Administrative judge Jennifer Drechsel Bailey (“Judge Bailey”) (Florida Bar No. 386.758), judge Victoria S. Sigler (“Judge Sigler”) (Florida Bar No. 313.920), judge Gisela Cardonne Ely (“Judge Cardonne Ely”) (Florida Bar No. 218.154), Deutsche National Bank & Trust Co. (“Deutsche Bank”), Kimberley L. Garno (“Garno”) (Florida Bar No. 84.538), Justin J. Kelley (Kelley”) (Florida Bar No. 32.106), J. Bennett Kitterman (“Kitterman”) (Florida Bar No. 98.636), Brandon C. Szymula (“Szymula”), (Florida Bar No. 98.803), Ronald Wolfe & Associates (“Ronald & Wolfe”), Shaib Yariel Rios (“Rios”) (Florida Bar No. 28.316), Ivan Dimitrov Ivanov (“Ivanov”) (Florida Bar No. 39.023), Maria Eva-Veronica Kwak (“Kwak”) (Florida Bar No. 107.362), Brock & Scott, PLLC (“Brock & Scott”), Ariel Acevedo (“Acevedo”) (Florida Bar No. 946.001), Liebler Gonzalez Portundo, P.A. (“Liebler Portundo”), and, the Criminal Enterprise. See Record, and [see also, Tavares Sworn Affidavit](#).

COUNTS

Count 47 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

Count 48 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States -- that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

Count 49 - Judge Lindsey, and other officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically deprive, under color of law, Tavares of his rights upon the sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

Count 50 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further criminal schemes upon, and by the subverted courts of law, in violation of 18 U.S.C. §1346.

Count 51 – Deutsche Bank, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to commit bank fraud by knowingly and intentionally defrauding the bank to further the known criminal scheme, in violation of, 18, U.S.C., § 1344.

Count 52 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, the Record filed in this matter, and [Tavares Sworn Affidavit](#).

Count 53– Rios, Garno, Kelley, Acevedo, Kitterman, Szymula, Ivanov, Kwak, and other officers of the court implicated, knowingly and intentionally use his Florida Bar licenses as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, repeatedly making patently false statements in writing to mislead the Miami Court to falsely incriminate, steal, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct.

Count 54 – Judges Langer, Lindsey, Bailey, Siegler, Cardonne Ely, and other officers of the courts implicated, knowingly and intentionally, use their judicial powers as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, systematically depriving, extorting, and violating Tavares’ rights, of constitutionally guaranteed rights, and due process, to further a known brazen scheme depriving and extorting Tavares of his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Florida Code of Judicial Conduct.

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

COUNTS

Count 55 - The Miami Courts, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

Count 56 - The Miami Courts, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, allowed its known Members implicated in a Criminal Enterprise, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States -- that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. See, U.S. Const., Amend. XIV.

Count 57 - Miami Courts, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to, knowingly and intentionally, allow the systematically deprivation, under color of law, of Tavares rights and properties upon known sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

Count 58 - The Miami Courts, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, knowingly and intentionally, allowing the systematic corruption and subversion of the judicial machinery by known Florida Bar licensed Members, to further known brazen criminal schemes upon courts of law in the United States of America, in violation of 18 U.S.C. §1346.

Count 59 - The Miami Courts, and other implicated Judges, knowingly and intentionally use their Florida Bar licenses as guise to commit crimes, willfully failing their duties to stop the known brazen criminal scheme, by systematically failing to properly investigate and stop the known violations of law by Hartog, Markowitz Trustee, and other Florida Bar licensees implicated, and by further making false statements in writing in 2014, in order to cover up the scheme, depriving, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.02, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See The Florida Bar Rules of Conduct, Rule 4-8.4.

THE FLORIDA BAR – BACKGROUND

The Florida Bar (“Florida Bar”) is the integrated¹⁰ bar association for the State of Florida. The Florida Bar currently shows more than 122,000 members, and it is led by a President, a President-Elect, an Executive Director, and a 52-member Board of Governors.

Article V, Section 15 of the Constitution of the State of Florida gives the Supreme Court of Florida exclusive and ultimate authority to regulate the admission of persons to the practice of law and the discipline of those persons who are admitted to practice. The Court performs those official functions through two separate arms: the Florida Board of Bar Examiners, which screens, tests and certifies candidates for admission to the practice, and The Florida Bar, the investigative and prosecutorial authority in the lawyer regulatory process. Neither of these two agencies, nor any of their functions, is supported by state tax¹¹ dollars.

It’s public mission statement is *“Regulate the practice of law in Florida; ensure the highest standards of legal professionalism in Florida; and protect the public by prosecuting unethical attorneys and preventing the unlicensed practice of law.”* See www.floridabar.org Mission Statement on October 14, 2023; and;

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

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

“I do solemnly swear:

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

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

²⁰ See, [The 1949 Decision by the Supreme Court of Florida](#).

²¹ The Florida Bar although not supported by “State Tax Dollars”, is a beneficiary of a Tax Exemption to pay Federal Tax Dollars under its claimed federal taxpayer status. At this time, Tavares has not found Federal or State Tax Records, but only for its Affiliated entity, The Florida Bar Foundation, Inc, a Not For Profit Corporation (“Bar Foundation”), Tax Id. #59-1004604, see www.sunbiz.org at Document #702751.

COUNTS

Count 60 - The Florida Bar, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the judicial machinery in a court of law in the United States of America in order to further major criminal schemes against the United States of America, in violation of 18 U.S.C. §371.

Count 61 - The Florida Bar, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, allowed its known Members implicated in a Criminal Enterprise, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States – – that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, 18 U.S.C. §241. *See*, U.S. Const., Amend. XIV.

Count 62 - The Florida Bar, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to, knowingly and intentionally, allow the systematic deprivation, under color of law, of Tavares rights and properties upon known sham court proceedings to falsely incriminate, deprive and extort Tavares, in violation of, 18 U.S.C. § 242.

Count 63 - The Florida Bar, and its implicated Members, as officers of the courts, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, knowingly and intentionally, allowing the systematic corruption and subversion of the judicial machinery by known Florida Bar licensed Members, to further known brazen criminal schemes upon courts of law in the United States of America, in violation of 18 U.S.C. §1346.

Count 64 - Craft, and other Members of the Florida Bar implicated, to further their criminal scheme subverting Florida courts to steal, deprive, and extort Tavares of rights and properties, knowingly and intentionally, uses, in 2014, U.S. Mail for the purpose of executing their scheme, in violation of 18 U.S.C. §1341.

Count 65 - Craft, and other Members of the Florida Bar implicated, knowingly and intentionally use their Florida Bar licenses as guise to commit crimes, willfully failing their duties to stop the known brazen criminal scheme, by systematically failing to properly investigate and stop the known violations of law by Hartog, Markowitz Trustee, and other Florida Bar licensees implicated, and by further making false statements in writing in 2014, in order to cover up the scheme, depriving, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.02, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. *See* The Florida Bar Rules of Conduct, Rule 4-8.4.

CONCLUSION

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

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

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

VERIFICATION

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

Dated: January 25, 2024

FURTHER AFFIANT SAYETH NAUGHT

/s/ Charles A. Tavares

Charles A. Tavares, Individually