

Geania Alves Fraga v. Charles A. Tavares – The “Double-Jeopardy” Second Fabricated Sham Domestic Violence Case No. 2012-24483-FC-04 (“FRAGA II”) to Falsely Incriminate and Silence Victim Tavares Under Color of Law upon Subverted Miami-Dade County Courts, Florida

1	October 3, 2012	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the United States of America &	Geania Alves Fraga Gabriela M. Machado Guimaraes Damian & Valori, LLP
2		§ 241 Conspiracy Against Rights &	Peter Francis Valori Russell Marc Landy
3		§ 1346 Scheme/Artifice to Defraud Honest Services &	BRIXRIV, LLC Bridgeloan Investors, Inc. Joseph H. Horn
4		§ 1349 Conspiracy to Commit Mail & Wire Fraud &	Ralph Horn Ricardo Eichenwald Fernando Braghin
5		§ 1961 <i>et seq.</i> – RICO &	BANIF Brickell, LLC Marco Antonio de Souza Pedro Serzedelo
6		FLORIDA STATUTES TITLE XLVI § 837.02 Perjury in Official Proceedings &	Jorge C. Pais Raul Marques Hugo Barreto Del Priore
7		FLORIDA BAR RULES OF CONDUCT Misconduct –Dishonesty-Fraud-Deceit Rule 4-8.4 (a)(b)(c)(d) &	NS Corporate Services, Inc. Nelson Slosbergas Marcia Del Rey
8		COMMON LAW Abuse of Process	

On or about October 3, 2012, the Perpetrators,¹ associates, and agents of a Criminal Enterprise, following, among other things, the totally false and fabricated first sham complaint for Injunction for Protection Against Repeat Violence by Geania A. Fraga (“Fraga”) against Charles A. Tavares (“Tavares”), Case No.2012-003753-FC-04 (“FRAGA I”) (filed on February 13, 2012 and dismissed on July 11, 2012), in the Domestic Violence Division in the Circuit Court of the Eleventh Judicial Circuit in Miami-Dade County, Florida (“Miami Court”), again, use their Manager/Agent Fraga in the criminal scheme to continue systematically subverting courts of law in the United States of America, trying to again falsely incriminate Tavares, preparing a sham vague petition, written in English, without a translation, or a certification from English to Portuguese, since Fraga is not fluent in English, signing a totally false, fabricated and fraudulent Petition prepared by attorney Marcia Del Rey-Garcia N/K/A Marcia Del Rey (“Del Rey”) (Florida Bar No.17780), in brazen reckless disregard for the truth, facts, the record on FRAGA I, the law, and the constitution. The sham Petition for Injunction for Protection Against Repeat Violence (“Initial Petition”) shows the cause of action for an Injunction Against Repeat Violence under §784.046 (3)(b), Florida Statutes, see Case No.2012-24483-FC-04 (“FRAGA II”), in the Miami Court.

¹The Perpetrators are long-time Criminal Associates, continuously perpetrating major criminal schemes against the United States of America, the State of Florida, and U.S. citizens, and Fraga is a Property Manager / Agent of BrixRiv LLC, a Florida L.L.C., and other entities used by the Perpetrators. See Record.

Del Rey's patently sham and vague Initial Petition to further the scheme, states, among other things:

"I, GEANIA FRAGA, being sworn, certify that the following statements are true:" See Initial Petition at 1.

"Petitioner [Fraga] has known Respondent [Tavares] since 2006." *Id.* at 1, Section II. Respondent, ¶¶ 2.

"b. On February 10, 2012, the Respondent, accompanied by other four men, went on a place where the Petitioner works and chased her. The Respondent took pictures of Petitioner. c. At the end of March 2006, the Respondent kidnapped the Petitioner in his car and drove her around town pointing a gun at her. The Respondent harassed her and made threats about getting the Petitioner deported. d. In November 2011, the Respondent engaged in a verbal argument with the Petitioner and threatened to kill her. The Respondent followed Petitioner to her home and sent her text messages harassing the Petitioner." See Initial Petition at 2 ¶¶ b, c, and, d.

"Petitioner genuinely fears repeat violence by Respondent." *Id.* at 2 ¶ 6.

"Respondent owns, has, and/or is known to have guns or other weapons." *Id.* at 2 ¶ 7(a).

"Petitioner asks the Court to enter a TEMPORARY INJUNCTION for protection against repeat violence that will be in place from now until the scheduled hearing in this matter.

Petitioner asks the Court to enter, after a hearing has been held on this petition, a final judgment of injunction prohibiting Respondent from committing any acts of violence against Petitioner and:

a. prohibiting Respondent from going to or within 500 feet of any place Petitioner lives 2411 NW 24 Avenue, Miami, Florida 33142. b. prohibiting Respondent from going to or within 500 feet of Petitioner's place of employment or the school Petitioner attends; the address of Petitioner's place of employment is: 2411 NW 24 Avenue, Miami, Florida 33142. c. prohibiting Respondent from contacting Petitioner by telephone, mail, by e-mail, in writing, through another person, or in any other manner; d. ordering Respondent not to use or possess any guns or firearms." *Id.* at 2 Section IV. Injunction ¶¶ 1, and, 2 (a)(b)(c)(d).

"I UNDERSTAND THAT BY FILLING THIS PETITION, I AM ASKING THE COURT TO HOLD A HEARING ON THIS PETITION, THAT BOTH THE RESPONDENT AND I WILL BE NOTIFIED OF THE HEARING, AND THAT I MUST APPEAR AT THE HEARING. I UNDERSTAND THAT IF EITHER RESPONDENT OR I FAIL TO APPEAR AT THE FINAL HEARING, WE WILL BE BOUND BY THE TERMS OF ANY INJUNCTION OR ORDER ISSUED AT THAT HEARING.

I UNDERSTAND THAT I AM SWEARING OR AFFIRMING UNDER OATH TO THE TRUTHFULNESS OF THE CLAIMS MADE IN THIS PETITION AND THAT THE PUNISHMENT FOR KNOWINGLY MAKING A FALSE STATEMENT INCLUDES FINE AND IMPRISONMENT.

Dated: October 3, 2012

/s/ Geania Fraga

GEANIA FRAGA

Sworn to or Affirmed and signed before me on October 3, 2012 by GEANIA FRAGA.

NOTARY PUBLIC or DEPUTY CLERK [signature and name and stamp]

Type of Identification produced: FI DL." See Initial Petition at 3.

[No Certification of Translation from Portuguese/English is shown on the filings, as the Miami Court and all the Parties well know, Fraga only is fluent in Portuguese and not in English or Spanish].

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, and to possess and carry lawful purchased guns, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amends. II; IV (the “Double-Jeopardy” Clause), V, and XIV.

Count 3- 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 4- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to implement their criminal scheme to defraud the United States of America, the State of Florida, and Tavares, by using, *e.g.*, interstate communications and wires to further the criminal scheme, in violation of 18 U.S.C. §1349.

Count 5- At all times relevant, the Perpetrators, as well as other unnamed 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(a) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that the allegations in her petition are true and correct, in violation of, §837.02, F.S. (Perjury in Official Proceeding). *See* Initial Petition 10/03/2012.

Count 6(b) : Perjury in Official Proceeding by Del Rey, to further the scheme by knowingly and intentionally, signing, as Fraga’s attorney, and an officer of the court, the patently sham bogus Initial Petition that shows on its face to be false, fabricated, and contradictory to the record shown on court

records on FRAGA I, falsely stating to the Clerk of the Miami Court, among other things, "I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief. Signature: /s/ Marcia del Rey-Garcia Marcia del Rey-Garcia, Esq. Florida Bar No. 17780 – 1800 S.W. 27th Avenue, Suite 500, Miami, FL 33145 Tel. (305) 529-0255 Fax (305) 529-0360 E-Mail: mdelgarcia@delreygarcialaw.com Attorney for Petitioner", in order to willfully mislead the courts, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012.

Count 6(c) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, "Petitioner has known Respondent since 2006." See Initial Petition at 1 Section II, ¶ 2, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012.

Count 6(d) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, "On February 10, 2012, the Respondent, accompanied by other four men, went on a place where the Petitioner works and chased her. The Respondent took pictures of Petitioner, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012 at 2 ¶ b.

Count 6(e) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, "At the end of March 2006, the Respondent kidnapped the Petitioner in his car and drove her around town pointing a gun at her. The Respondent harassed her and made threats about getting the Petitioner deported," in violation of §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012 at 2 ¶ c.

Count 6(f) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, "In November 2011, the Respondent engaged in a verbal argument with the Petitioner and threatened to kill her. The Respondent followed Petitioner to her home and sent her text messages harassing the Petitioner," in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012 at 2 ¶ d.

Count 6(g) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, "Petitioner genuinely fears repeat violence by Respondent [Tavares], in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012 at 2 ¶ 6.

Count 7 – Del Rey , an officer of the court, knowingly and intentionally uses her Florida Bar license as guise to commit crimes, willfully participating in the brazen and known criminal scheme, systematically making patently false statements in writing to mislead the Miami Court to falsely incriminate, 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 Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT, stating; "A lawyer shall not: (a) violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through acts of another;

(b) commit a criminal act that reflects adversely on the lawyer’s honesty, trustworthiness, or fitness as a lawyer in other respects; **(c)** engage in conduct involving dishonesty, fraud, deceit, or misrepresentation, except that it shall not be professional misconduct for a lawyer for a criminal law enforcement agency or regulatory agency to advise others about or to supervise another in an undercover investigation, unless prohibited by law or rule, and it shall not be professional misconduct for a lawyer employed in a capacity other than as a lawyer by a criminal law enforcement agency or regulatory agency to participate in an undercover investigation, unless prohibited by law; **(d)** engage in conduct in connection with the practice of law that is prejudicial to the administration of justice, including to knowingly, or through callous indifference, disparage, humiliate, or discriminate against litigants, jurors, witnesses, court personnel, or other lawyers on any basis, including but not limited to , on account of race, ethnicity, gender, religion, national origin, disability, marital status, sexual orientation, age, socioeconomic status, employment, or physical characteristic;” See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4 (a)(b)(c)(d) at www.floridabar.org.

Count 8 - Del Rey , an officer of the court, Abuses Process, along with Fraga and other Perpetrators, knowingly and intentionally filing a patently sham Petition with false, fabricated, and contradictory claims that are not – and could not be true, and without any shred of evidence, and the record on the previous sham case FRAGA I further showing to any reasonable person to be a total fraud, and further knowingly and intentionally violating Tavares’s rights in a Double Jeopardy FRAGA II sham case, and systematically making and filing patently false statements in writing to mislead the Miami Court to falsely incriminate, 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 Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT.

Fraga, Del Rey, and the Perpetrators implicated all knew in truth and in fact that their allegations in FRAGA II are completely false and fabricated, and they are patently contradictory even to the false and fabricated allegations on the sham FRAGA I case, showing their reckless disregard for the laws, the constitution, Tavares’s rights, the judicial machinery, and for the rule of law, unafraid of any legal consequence to them, as they know they will not be punished for systematically violating the law upon courts of law in the United States of America, but indeed, as the record clearly shows, they will be rewarded with, among other things, money, properties, and nominations and supporting to higher positions of power to continue furthering the Criminal Enterprise’s ever more powerful criminal schemes and impunity against the United States, the State of Florida, and U.S. citizens. See [Record](#).

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 anyone else, to fabricate, among others, the false, invalid, and fraudulent resolutions of June 28 and 29, 2011. See Record.

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

The Criminal Enterprise, showing reckless disregard for the law, and its evil powers to freely and systematically subvert courts of law in the United States to further criminal rackets against, *e.g.*, the United States, the State of Florida, and U.S. citizens, following the Criminal Enterprise's Associate Peter F. Valori's ("Peter") (Florida Bar No. 43.516), Damian & Valori, LLP a.k.a. Damian Valori | Culmo ("Valori") threats of November 10, 2011 at 5:04 p.m. against Charles Tavares ("Tavares"), the Criminal Enterprise causes Geania A. Fraga ("Fraga"), a Manager/Agent of BRIDGELOAN/BANIF, to file, with unclean hands, on February 13, 2012, a first false and fabricated sham case of Domestic Repeat Violence against Charles Tavares ("Tavares"), *Geania A. Fraga v. Charles Tavares ("FRAGA I")*, Case No. 2012-03753-FC-04, supported by absurd fabricated false claims, and supported by three (03) false witnesses – including, among others, criminal Gabriela Maranhao Machado Guimaraes ("Guimaraes"), Martiza C. Calix ("Calix"), and Dunia Irene Pacheco ("Pacheco"), assisted by criminal Russell Marc Landy ("Landy") (Florida Bar No. 44.417), at Valori, represented by implicated attorney Silvia Perez ("Perez") (Florida Bar No. 505.374). As part of the scheme, the Criminal Enterprise causes the subverted Miami Courts to assign the sham Fraga I case to be presided by corrupt Judge Joseph 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. successfullv extorting. under color of law. the trust account's monevs. See Record.

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

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

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

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

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

As part of an underlying scheme by the Criminal Enterprise to deprive, steal, and extort Charles Tavares ("Tavares") of all properties and rights, under color of law, upon subverted court proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), on June 6, 2012, file, with unclean hands, a sham suit, *Markowitz Ringel Trusty & Hartog, P.A.* (Tax Id. #59-2325782), *Escrow Agent v. Miami River Park Marina, Inc., a Florida corp.* (Tax Id. #20-3168472), v. *BRIXRIV, LLC, a Florida L.L.C.* (No Tax Id.) ("**Markowitz**" case), Case No. 2012-20197-CA-22, causing Associates Ross R. Hartog ("Hartog") (Florida Bar No. 272.360), at Markowitz Davis Ringel & Trusty P.A. n.k.a. Markowitz Ringel Trusty & Hartog, P.A. ("Markowitz Trustee"), Bridgeloan Investors, Inc., a Florida corp. ("BRIDGELoAN") (Tax Id. # 65.0665516), BANIF Securities, Inc., ("BANIF"), and Matthew P. Leto ("Leto") (Florida Bar No. 14.504), to, knowingly and intentionally, systematically deprive, steal, and extort, under color of law, upon subverted proceedings before the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), Tavares, and Tavares's Company Miami River Park Marina, Inc., a Florida corporation ("Miami River Park Marina"). The Associates of the Criminal Enterprise, following the same *modus operandi* in the Related Cases, among others, in the, *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. BNY Mellon*, Case No. 2009-93058-CA-30; *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No. 2011-29624-CA-30; in *Geania A. Fraga v. Charles Tavares*, Case No. 2012-03573-FC-04; and, in *Geania A. Fraga v. Charles Tavares*, the double-jeopardy Case No. 2012-24483-FC-04, file false and contradictory pleadings, supported by false and fraudulent evidence, and false witnesses, upon subverted court proceedings, presided by corrupt judges Associates of the Criminal Enterprise systematically violating the law, Florida Rules of Civil Procedure, the constitution, and Tavares's rights to deprive, steal, and extort Tavares, under color of law. See [Tavares Sworn Affidavit](#). Hartog, on behalf of Markowitz Trustee, 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.*

COUNTS

Count 9- 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 10- 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, and to possess and carry lawful purchased guns, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amends. II; IV (the “Double-Jeopardy” Clause), V, and XIV.

Count 11- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, 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 12- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to implement their criminal scheme to defraud the United States of America, the State of Florida, and Tavares, by using, *e.g.*, interstate communications and wires to further the criminal scheme, in violation of 18 U.S.C. §1349.

Count 13- At all times relevant, the Perpetrators, as well as other unnamed 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 14a) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that the allegations in her petition are true and correct, in violation of, §837.02, F.S. (Perjury in Official Proceeding). *See* Initial Petition 10/03/2012.

Count 14(b) : Perjury in Official Proceeding by Del Rey, to further the scheme by knowingly and intentionally, signing, as Fraga’s attorney, and an officer of the court, the patently sham bogus Initial Petition that shows on its face to be false, fabricated, and contradictory to the record shown on court

records in the FRAGA I sham case, falsely stating to the Clerk of the Miami Court, among other things, “I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief. Signature: /s/ Marcia del Rey-Garcia Marcia del Rey-Garcia, Esq. Florida Bar No. 17780 – 1800 S.W. 27th Avenue, Suite 500, Miami, FL 33145 Tel. (305) 529-0255 Fax (305) 529-0360 E-Mail: mdelgarcia@delreygarcialaw.com Attorney for Petitioner”, in order to willfully mislead the courts, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012.

Count 14(c) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, “Petitioner has known Respondent since 2006.” See Initial Petition at 1 Section II, ¶ 2, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012.

Count 14(d) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, “On February 10, 2012, the Respondent, accompanied by other four men, went on a place where the Petitioner works and chased her. The Respondent took pictures of Petitioner, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012 at 2 ¶ b.

Count 14(e) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, “At the end of March 2006, the Respondent kidnapped the Petitioner in his car and drove her around town pointing a gun at her. The Respondent harassed her and made threats about getting the Petitioner deported,” in violation of §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012 at 2 ¶ c.

Count 14(f) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, “In November 2011, the Respondent engaged in a verbal argument with the Petitioner and threatened to kill her. The Respondent followed Petitioner to her home and sent her text messages harassing the Petitioner,” in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012 at 2 ¶ d.

Count 14(g) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, “Petitioner genuinely fears repeat violence by Respondent [Tavares], in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Initial Petition 10/03/2012 at 2 ¶ 6.

Count 15 – Del Rey, an officer of the court, knowingly and intentionally uses her Florida Bar license as guise to commit crimes, willfully participating in the brazen and known criminal scheme, systematically making patently false statements in writing to mislead the Miami Court to falsely incriminate, extort, and deprive, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar Oath, and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT, stating; “A lawyer shall not: **(a)** violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through acts of another;

(b) commit a criminal act that reflects adversely on the lawyer’s honesty, trustworthiness, or fitness as a lawyer in other respects; **(c)** engage in conduct involving dishonesty, fraud, deceit, or misrepresentation, except that it shall not be professional misconduct for a lawyer for a criminal law enforcement agency or regulatory agency to advise others about or to supervise another in an undercover investigation, unless prohibited by law or rule, and it shall not be professional misconduct for a lawyer employed in a capacity other than as a lawyer by a criminal law enforcement agency or regulatory agency to participate in an undercover investigation, unless prohibited by law; **(d)** engage in conduct in connection with the practice of law that is prejudicial to the administration of justice, including to knowingly, or through callous indifference, disparage, humiliate, or discriminate against litigants, jurors, witnesses, court personnel, or other lawyers on any basis, including but not limited to , on account of race, ethnicity, gender, religion, national origin, disability, marital status, sexual orientation, age, socioeconomic status, employment, or physical characteristic;” See [The Florida Bar Rules of Professional Conduct](http://www.floridabar.org), Rule 4-8.4 (a)(b)(c)(d) at www.floridabar.org.

Fraga, Del Rey, and the Perpetrators implicated all knew in truth and in fact that their allegations in FRAGA II are completely false and fabricated, and they are patently contradictory even to the false and fabricated allegations on the FRAGA I sham case, showing their reckless disregard for the laws, the constitution, Tavares’s rights, the judicial machinery, and for the rule of law, unafraid of any legal consequence to them, as they know they will not be punished for subverting the judicial machinery, and systematically violating the law upon courts of law in the United States of America, but indeed, as the record clearly shows, they will be rewarded with, among other things, money, properties, and nominations and supporting to higher positions of power to continue furthering the Criminal Enterprise’s ever more powerful criminal schemes and impunity against the United States, the State of Florida, and U.S. citizens. See [Record](#).

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
16	November 5, 2012	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the United States of America &	Geania Alves Fraga Gabriela Machado Guimaraes Damian & Valori, LLP
17		§ 241 Conspiracy Against Rights &	Peter Francis Valori Russell Marc Landy
18		§ 242 Deprivation of Rights Under Color of Law &	BRIXRIV, LLC Bridgeloan Investors, Inc. Joseph H. Horn
19		§ 1346 Scheme/Artifice to Defraud Honest Services &	Ralph Horn Ricardo Eichenwald Fernando Braghin
20		§ 1349 Conspiracy to Commit Mail & Wire Fraud &	BANIF Brickell, LLC Marco Antonio de Souza Pedro Serzedelo
21		§ 1961 <i>et seq.</i> – RICO &	Jorge C. Pais Raul Marques
22		<u>FLORIDA STATUTES</u> TITLE XLVI § 837.02 Perjury in Official Proceedings &	Hugo Barreto Del Priore NS Corporate Services, Inc. Nelson Slosbergas Samia Ahmad
23		<u>FLORIDA BAR RULES OF CONDUCT</u> Misconduct –Dishonesty-Fraud-Deceit Rule 4-8.4 (a)(b)(c)(d) &	Dynamic Reporting, Inc. Marcia Del Rey
24		<u>FLORIDA CODE OF JUDICIAL CONDUCT</u> Violations of Canons 1; 2; and 3	

On or about November 5, 2012, Judge Joseph Davis, Jr. (“Judge Davis Jr.”) (Florida Bar No. 155.299), in reckless disregard for the law, holds a sham hearing in the Double Jeopardy to falsely incriminate and silence Tavares from continuing exposing the Criminal Enterprise’s schemes and extortion upon the subverted Florida courts, while his longtime former law firm (from 1980 through 2010) Markowitz, Davis, Ringel & Trusty P.A. N/K/A Markowitz Ringel Trusty & Hartog, P.A. (“Markowitz Trustee”) is concurrently participating in another ongoing scheme depriving and extorting Tavares of rights and properties, under color of law, upon the subverted² Miami Courts, see Markowitz-BRIDGELoan-BANIF-MRPM sham Case No. 2012-21795-CA-01. Demonstrating that Judge Davis Jr. is corrupted into the scheme, knowingly and intentionally disregarding truth and facts contained in the petitions and record, showing among other things, completely false, fabricated and contradictory allegations by Fraga and the Perpetrators, and no evidence to support the bogus allegations, and showing that Judge Davis Jr. is systematically using his Florida Bar license and position of power as a judge to further major crimes against the United States of America, the State of Florida, and against Tavares. See Record.

² The Criminal Enterprise is shown to totally corrupt the judicial machinery, even Court Reporters, in order to have them subvert the transcribed true court proceedings to blur the record, see, for example, showing on the Transcript of 11/05/2012, Case 12-003753-FC-04 (FRAGA I), and not the correct Case 12-024483-FC04 (Fraga II, the Double Jeopardy Case), and other “typos” to blur the record. See Record.

COUNTS

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 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, as clearly shown on implicated Judge Davis Jr.'s opening remarks at the November 5, 2012 sham hearing; THE COURT: "Ms. Fraga, you filed a domestic repeat violence case, the one that's before the Court right now back on October 4. At the time you filed your case the judge looked at your papers determined that there was insufficient basis to give you a temporary injunction against Mr. Tavares, so you were denied at inception getting an injunction. But the judge did order that we have a hearing which we're going to have today to determine notwithstanding that you did not get the injunction at the filing of the case, whether you might have an opportunity now to prove sufficient basis to have an injunction at this time. That's the purpose of the hearing that we're scheduled for today. Can I assume by your presence today with counsel that that is what you're seeking, still trying to get an injunction against Mr. Tavares, notwithstanding that you did not get one at the start of this case? FRAGA: Yes, sir." See Tr. 4 ¶¶ 15 – 25; *Id.* 5 ¶¶ 1 – 10.

Count 17- 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, and to possess and carry lawful purchased guns, in violation of, among other things, 18 U.S.C. §241. See, *e.g.*, U.S. Const., Amends. II; IV (the "Double-Jeopardy" Clause), V, and XIV.

Count 18- Judge Joseph I. Davis Jr., attorney Del Rey, 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 19- 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 20- The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to implement their criminal scheme to defraud the United States of America, the State of Florida, and Tavares, by using, *e.g.*, interstate communications and wires to further the criminal scheme, in violation of 18 U.S.C. §1349.

Count 21- At all times relevant, the Perpetrators, as well as other unnamed 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 22(a) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that the allegations in her petition are true and correct, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 11/05/2012 at 3 ¶¶ 4 – 8, showing: THE BAILIFF: “Do you solemnly swear or affirm the testimony you are about to give is the truth, the whole truth, and nothing but the truth? TAVARES: Yes, I do. FRAGA: Yes.”

Count 22(b) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Tavares made threatening calls to her in August and September 2012, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 11/05/2012 at 7 ¶¶ 8 – 19, showing: THE COURT: “What you put in here was the following: “After July 12, 2012 when the court entered an order dismissing the petition for injunction for protection against repeat violence sought by the petitioner, the petitioner has made numerous phone calls from different phone numbers to petitioner threatening her that he [she] needs to disappear, specifically on August 6th, 13, 20 and 27 of 2012. And on September 3, 10, 17 and 24 of 2012. The respondent called and stated that she needs to disappear and that she has no right to work in this country and no right to be in and or work at any of his properties.”

Count 22(c) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Tavares was following her on February 10, 2012, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 11/05/2012 at 7 ¶¶ 20 – 25; *Id.* 8 ¶¶ 1 – 6, showing: THE COURT: “And then you went on in paragraph five to give us other incidents which are described below, paragraph 5A says the following: On February 10, 2012, the respondent arrived at an apartment complex where petitioner was working. The petitioner saw the respondent and immediately left. A few minutes later, the petitioner noticed that the respondent was following her for a period of ten minutes. The petitioner made a left turn and the respondent continued to drive when he realized and or suspected that the petitioner was calling the police department. A report was filed.”

Count 22(d) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Tavares and four other men chased her, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 11/05/2012 at 8 ¶¶ 6 – 10, showing: THE COURT: “On February 10th, 2012, the respondent accompanied by four other men went to a place where the petitioner works and chased her. The respondent took pictures of the petitioner.”

Count 22(e) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Tavares kidnapped Fraga and drove her around at gun point, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 11/05/2012 at 8 ¶¶ 11 – 15; *Id.* at 8 ¶¶ 20 – 24, showing: THE COURT: “At the end of March 2006, the respondent kidnapped the petitioner in his car and drove around town pointing a gun at her. The respondent harassed her and made threats about getting the petitioner deported.” THE COURT: “Ms. Fraga, when you filed your petition in this case on October 4, were those allegations that I just read on paragraphs four and five of your petition true and correct? FRAGA: Yes, sir.”

Count 22(f) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Tavares in November 2011, threatened to kill Fraga, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 11/05/2012 at 8 ¶¶ 15 – 19, showing: THE COURT: “In November 2011, the respondent engaged in a verbal argument with the petitioner and threatened to kill her. The respondent followed the petitioner to her home and sent text messages harassing the petitioner.” THE COURT: “Ms. Fraga, when you filed your petition in this case on October 4, were those allegations that I just read on paragraphs four and five of your petition true and correct? FRAGA: Yes, sir.” *Id.* at 8 ¶¶ 20 – 24.

Count 22(g) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Tavares continued making threatening phone calls after October 4, 2012, when the previous Judge denied relief to her bogus petition, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 11/05/2012 at 8 ¶ 2; *Id.* at 9 ¶¶ 1 -22, showing: THE COURT: “Is there anything of substance that either you did not put in your petition or just happened since October 4th when you filed your petition that you thing the Court needs to be aware of today? FRAGA: From October 4th? THE COURT: That’s the date you filled your petition. I’m interested in knowing if anything of substance has happened since then. FRAGA: After October 4th, there are phone calls. THE COURT: Describe those to me. FRAGA: I received calls saying that I had to disappear, that I knew what to do. THE COURT: Do you know who those calls where from? FRAGA: From Mr. Charles Tavares. THE COURT: It was he on the other end of the phone, you heard his voice? FRAGA: Yes, by the voice, I knew. THE COURT: Did he identify himself or did you recognize the voice? FRAGA: I recognized the voice.”

Count 22(h) : Perjury in Official Proceeding by Del Rey, an officer of the court, to further the scheme by knowingly and intentionally, falsely leading Fraga to continue lying other oath to falsely incriminate Tavares as part of their scheme upon the court, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 11/05/2012 at 11 ¶¶ 10 – 19, showing: DEL REY: “In any of the eight phone calls that you received, did he mention anything else to you” FRAGA: That I have no right to stay in the job , at this work. That I had to leave, yeah. DEL REY: And in those phone calls, was there anything else or was that what he said every single time? AUERBACHER: Objection. Form. Leading. THE COURT: Overruled. FRAGA: Always the same, that I had to disappear.”

Count 22(i) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Fraga is afraid of Tavares because Tavares kidnapped her at gun point in 2006, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 11 ¶¶ 20 – 25, showing: DEL REY: “Are you afraid of Mr. Tavares? FRAGA: Yes, a lot. DEL REY: Why are you afraid of Mr. Tavares? FRAGA: Because in the past, he kidnapped me, and he went around Brickell.”

Count 22(k) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Fraga is traumatized because Tavares kidnapped her at gun point in 2006, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 13 ¶¶ 11 – 19, showing: AUERBACHER: “Now, you admitted on your testimony you did not mention the alleged prior kidnapping at the last hearing; is that correct? FRAGA: No, I did not mention it. AUERBACHER: And those are pretty serious allegations, weren’t they” FRAGA: For me it was grave, and I’m traumatized until today. It’s very serious what he did to me.”

Count 22(l) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Fraga filed a police report for the alleged incident of February 10, 2012 with the police department, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 13 ¶¶ 20 – 25, showing: AUERBACHER: “In your petition you also referenced an incident on February of 2012; is that correct? FRAGA: Yes, yes. AUERBACHER: And in your petition, you indicate that a police report was filed; is that correct? FRAGA: Yes, yes.”

Count 22(m) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Fraga brought the purported police report she allegedly filed on February 10, 2012, and/or delivered to the Court in the last hearing, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 14 ¶¶ 1 – 9, showing: AUERBACHER: “Did you bring that police report with you? FRAGA: Yes, yes. AUERBACHER: Okay, why wasn’t that attached? FRAGA: The last time I came, I did give it to the Court. AUERBACHER: Counsel, do you know if that was produced in the last -- DEL REY: I wasn’t part of the last hearing.”

Count 22(n) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Fraga is paying for her attorney, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 15 ¶¶ 9 – 25; *Id.* 16 ¶¶ 1 – 9; *Id.* 16 ¶¶ 15 – 25; *Id.* 17 ¶¶ 1 – 5, showing: AUERBACHER: Now, who is paying for your lawyer today, Ms. Fraga? Del Rey: Objection. Relevance. THE COURT: What’s the relevance counselor? AUERBACHER: Well, there’s a civil case. There’s a related case involving her employer or a related entity of her employer. This came up at the prior petition. My client sought to reopen that case about a month ago because it’s very relevant, that’s what prompted these allegation. And for that reason we think it is relevant. At the last hearing, the attorneys in the civil case that he has with her employer, they were monitoring the hearing. So we think it is certainly relevant to this proceeding. THE COURT: Well, who’s paying for her attorney today has relevance to, in your opinion, whether or not there has been domestic violence occurring in this case? AUERBACHER: Or whether these allegation have been fabricated, Your Honor, to seek to harass my client. THE COURT: That’s part of the defense theory? AUERBACHER: That’s part of our defense, Your Honor. FRAGA: Who’s paying my lawyer? Me. THE COURT: Okay. AUERBACHER: Has your employer

assisted you with any funding on the payment of counsel? FRAGA: I'm self employed. I don't know what employer you are talking about. AUERBACHER: Are you familiar with the entity of BrixRiv, LLC? FRAGA: He's not my boss. AUERBACHER: Do you provide services for that entity? FRAGA: For a lot of different companies including that one, yes. AUERBACHER: And you're aware that that company has litigation with Mr. Tavares; is that correct? FRAGA: They never commented that to me."

Count 22(o) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Tavares called Fraga, and she jotted the days and month of Tavares' alleged calls in September 2012, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 17 ¶¶ 6 – 9; *Id.* 17 ¶¶ 21 – 25; *Id.* 18 ¶¶ 1 – 5; *Id.* 18 ¶¶ 7 – 18, showing: AUERBACHER: Now, in September you alleged that there was four phone calls made to you in that month as well. Correct? FRAGA: Yes. AUERBACHER: Do you recall what day of the week those calls were made? FRAGA: I remember the month and the date. AUERBACHER: Well, what time were the phone calls made? FRAGA: I cannot tell you neither the day of the week nor the time of the day because my nervous system is a wreck. AUERBACHER: But when you jotted the days that he called you, didn't you put the time of the day he called? DEL REY: Objection. Asked and answered. THE COURT: Overruled. FRAGA: I wrote down the month and date. Important was date and month. AUERBACHER: Did you write down what was discussed in your alleged telephone conversations? FRAGA: Always saying the same thing. It does not change. AUERBACHER: Did you write that down, ma'am? FRAGA: No, because it's already in here. He talks about the same thing. AUERBACHER: What phone number were you called from? FRAGA: Different numbers. AUERBACHER: Okay. Did you jot any of the phone numbers down? FRAGA: No, I did not write them."

Count 22(p) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Tavares would physically hurt Fraga, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 21 ¶¶ 18 – 23, showing: AUERBACHER: "Now, Mr. Tavares hasn't said that he would physically hurt you in the past six months, has he? FRAGA: He did say, yes. AUERBACHER: And what specifically did he say? FRAGA: He said I had to disappear. That I knew what to do."

Count 22(q) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Fraga had received a call from Tavares, between August and September 2012 while she was at her lawyer's office, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 22 ¶¶ 9 – 18, showing: AUERBACHER: "When you received these calls, where these calls received at work? FRAGA: I don't remember exactly whether it was at work or at home. Once I was at the office of the lawyer, and I remember I received a call, and I heard the voice, and I turned my phone off immediately. AUERBACHER: Did you ever seek to obtain these records from your cell company? FRAGA: If I try? No, no."

Count 22(q) : Perjury in Official Proceeding by Fraga, to further the scheme by knowingly and intentionally, falsely reaffirming under oath that, Fraga received those eight calls on Mondays of August and September 2012, in violation of, §837.02, F.S. (Perjury in Official Proceeding). See Tr. 24 ¶¶ 4 – 8, showing: THE COURT: "Is there any logic to the fact that all those calls would come in to you from Mr. Tavares on a Monday? FRAGA: I received those calls, those dates. Why? I don't know."

Count 23(a) : Perjury by Contradictory Statements by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath, contradicting Police Records, that, Fraga filed on February 12, 2012 a police report upon being followed by Tavares, in violation of, §837.021, F.S. (Perjury by Contradictory Statements). See Tr. 13 ¶¶ 20 – 25, showing: AUERBACHER: “In your petition you also referenced an incident on February of 2012; is that correct? FRAGA: Yes, yes. AUERBACHER: And in your petition, you indicate that a police report was filed; is that correct? FRAGA: Yes, yes.”

Count 23(b) : Perjury by Contradictory Statements by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Fraga has known Tavares since 2006, contradicting her previous petition filed on February 13, 2012 stating she knows Tavares since 2000, and the current action filed on October 4, 2012, stating under oath that she has known Tavares since 2006, and further contradicting herself on the sworn testimony, showing the legal farce, in violation of, §837.021, F.S. (Perjury by Contradictory Statements). See Tr. 20 ¶¶ 5 – 25; *Id.* 21 ¶¶ 1- 2, showing: AUERBACHER: “Do you recall in your petition it says that you’ve known him since 2006? FRAGA: I’ve known since 2000. AUERBACHER: Well, your petition says 2006; is that an incorrect statement? FRAGA: 2006 was when he kidnapped me. AUERBACHER: Well, I’m looking at paragraph two of your petition. It says petitioner has known respondent since 2006, and you swore that was a true fact; is that correct? FRAGA: Where? AUERBACHER: The first page of your petition. FRAGA: I met Charles Tavares, I know him. 2006, also, I know him. Yeah. Yeah, I know him. AUERBACHER: So you have known him since 2006 or 2000? Which is it? FRAGA: 2006 was when he started showing violence towards me, and he kidnapped me, and I found out the way, his ways. The way he is. THE COURT: Ms. Fraga, it’s a simple question. When did you first met Mr. Tavares? FRAGA: I met him, I known him since 2000. 2000.”

Count 23(c) : Perjury by Contradictory Statements by Fraga, to further the scheme by knowingly and intentionally, falsely stating under oath that, Fraga knows the address of Tavares’ former property Brickell Village One, LLC (“Brickell Village Property”, consisting of several buildings, and different street addresses) at 170 SW 12 Street, Miami, Florida because she “gave service there once”, in violation of, §837.021, F.S. (Perjury by Contradictory Statements). See Tr. 22 ¶¶ 22 - 25; *Id.* 23 ¶ 1- 19, showing: AUERBACHER: “Ma’am, are you familiar with the address, 170 Southwest 12th Street, Miami, Florida? FRAGA: The address again, please. AUERBACHER: 170 Southwest 12th Street? FRAGA: Yes, yes. AUERBACHER: And why are you familiar with that address, ma’am? FRAGA: Because I give service there once. AUERBACHER: You don’t provide services there anymore? FRAGA: Sometimes, yes. AUERBACHER: Okay, and that’s for BrixRiv, LLC, B-R-I-X, Riv, RIV? FRAGA: When they request me. FRAGA: And when was the last time that they requested you to provide services? FRAGA: I cannot remember now. AUERBACHER: Was it in the last two months? FRAGA: I cannot remember exactly now. AUERBACHER: And the type of services that you would have provided were property management service; is that correct? FRAGA: Sometimes they call me, yes.” Fraga, in furtherance of the criminal scheme, and to further cover up the fact that BRIXRIV, and other implicated Perpetrators are behind the criminal scheme and are funding her false allegations against Tavares in order to deprive, extort and silence Tavares in the Related Cases, further contradicts the known truth, facts, and the record filed in the first sham case FRAGA I, and in this matter, the Double Jeopardy FRAGA II, showing, among other things, that Fraga has been continuously working since, at least, June 2011 as a property manager/agent for Brickell Village for BRIXRIV, as evidenced by among other things, a notice to tenants of June 2011 given to all of Tavares’s former tenants in the Brickell Village Property, stating:

**“BrixRiv
Management**

UNIT: 159 SW 13 St, Mia, FL 33130

Miami, June 28, 2011

TENANT: George #4

Dear Tenants of Brickell Village Buildings,

This notice is to inform you that the property located at 130 SW 12 Street, known as Brickell Village One, is now owned by BrixRiv, LLC and is now under new management by BridgRiv Management, LLC.

At this time, we would also like to introduce Ms. Geania Fraga, as she will be your contact for all matters related to your lease. Please make sure all your payments and correspondence are sent to our offices at 2601 South Bayshore Drive, Suite 1200, Miami, FL 33133. Please contact Ms. Geania Fraga at 786- 355-0381 if you have any additional questions.

Sincerely yours,

BRIXRIV LLC

2601 S. Bayshore Drive #1200, Miami FL 33143.” See BRIXRIV Notice, on Record, filed as Exhibit B.

BrixRiv, LLC, a Florida Limited Liability Company (“BRIXRIV”) (Tax Id. # N/A) (SUNBIZ Document #L11000065311), incorporated on June 3, 2011 by the Criminal Enterprise’s attorney and registered agent, and an Associate, specializing in money laundering and corporate frauds, Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378887), showing business address at 2601 South Bayshore Drive, Suite 1200, Miami, Florida 33133. BRIXRIV shows its manager to be BRIDGERIV MANAGEMENT LLC, a Florida Limited Liability Company (“BRIDGERIV”) (Tax Id. #45-2471799) (SUNBIZ Document #L11000064766), incorporated on June 2, 2011 by the Criminal Enterprise’s Associate Slosbergas showing same address of BRIXRIV, and showing its manager as Bridgeloan Investors, Inc., a Florida corp. (“BRIDGELOAN”) (Tax Id. #65-0665516) (SUNBIZ Document #P96000042015). BRIXRIV a/k/a RIVBRIX, LLC, a Florida Limited Liability Company (“RIVBRIX”) (Tax Id. N/A) (SUNBIZ Document #L11000065316), was created by the Criminal Enterprise’s Associates BRIDGELOAN and BANIF Brickell, LLC, a Florida L.L.C. (Tax Id. # N/A) (SUNBIZ Document #L11000064814), BANIF Miami River, LLC, a Florida L.L.C. (Tax Id. # N/A) (SUNBIZ Doc. #L11000064787), BANIF Mortgage Company, a Florida corporation a.k.a. Weston Capital USA Corp. (Tax Id. #32-0006395) (SUNBIZ Document #P02000022068), BANIF Securities, Inc., a Cayman Islands company (all herein, referred as, “BANIF”), in order to money launder the proceeds of Tavares’s extorted , under color of law, properties (the “Brickell Village Buildings”, and the “9 Acres Miami River Park Marina Property”) upon sham court proceedings. See Sham BRIDGELOAN Case No.2009-93058-CA-30, before the subverted Eleventh Judicial Circuit Court in and for Miami-Dade County, Florida.

TAVARES takes the stand on the Double Jeopardy FRAGA II sham case, stating, among other things: AUERBACHER: “Now you’ve heard allegations that you contacted her on a Monday in the months of August and September and apparently some other phone calls were made in October. Did you call her? TAVARES: No, it’s completely false. I never called her. As a matter of fact, she doesn’t even have records and like the previous allegations everything is fabricated and malicious related to the other ongoing cases. THE COURT: Let me make sure I understand that. You’ve never called her, these calls she alleges in August and September, you did not make? TAVARES: Yes, Your Honor, these calls, August 6, August 13, August 20, August 27, September 3rd, September 10, September 17, September 24th, I never called her. It’s completely false and I beg Your Honor to request that petitioner provide records for these allegations. THE COURT: Go ahead, counselor.” See Tr. 25 ¶¶ 23 – 25; *Id.* 26 ¶ 1- 15.

IMPLICATED JUDGE DAVIS JR. makes his closing remarks in the legal Double Jeopardy farce, subverting the courts to deprive and extort Tavares of properties and rights, by him and the other Perpetrators of the Criminal Enterprise, stating, among other things: “THE COURT: “When I say I’m dismissing it without prejudice, that’s the way I dismissed your previous case that was before me not too long ago in July. Without prejudice means that in the event that there is some conduct by Mr. Tavares that would warrant you filing another case for domestic violence, the courthouse door is still open for you to do that. But I would caution that if you do that , you need to have some substantial allegations that my support such relief. You have filed this case after having had the last case dismissed. A number of allegations that is you put in this petition in paragraphs 5A through D are dated at times before July 11, 2012, when we dismissed your first case. So I have not given great weight to the allegations that you put in the petition here that predated the dismissal of your last case. We do not have telephone records that have been submitted into evidence that would substantiate the receipt of the phone calls that you say you received from Mr. Tavares on the dates indicated, all of which were Monday that I’ve taken notice of.” See Tr. 27 ¶¶ 17 - 25; *Id.* 28 ¶ 1- 15.

Count 23(d) - Perjury by Contradictory Statements by Samia Ahmad (“Ahmad”), and Dynamic Reporting, Inc. [a Florida corporation, Tax Id. # 55-0870585; Sunbiz Document # P04000088719] N/K/A Janbert Reporting Service, Inc. [controlled by Janet Baldauf, and, dissolved on 04/25/2016], to further the scheme by knowingly and intentionally, falsely stating under oath that the FRAGA II case is styled Case No. 2012-003753-FC-04 on the Transcript of Hearing of November 5, 2012, Page 1, and several other willful “typos” in order to blur the record in the criminal scheme upon the Miami Court, in violation of, 18, U.S.C. §371, 18, U.S.C. § 241, 18, U.S.C. § 1346, and, § 837.021, Florida Statutes (Perjury by Contradictory Statements).

Implicated Judge Davis Jr., showing he is knowingly and intentionally subverting courts of law in the United States of America to further a known brazen criminal scheme by the Criminal Enterprise, willfully fails his sworn oath a judge, by systematically allowing and participating in the extortion and deprivation of Tavares's rights and properties, in both the FRAGA I and the Double Jeopardy FRAGA II sham cases by him and other Perpetrators, Associates and agents of the known Criminal Enterprise. Their systematic violations of the law, the constitution and Tavares's rights, succeeds in depriving Tavares of his freedom of movement, his rights as a law abiding citizen to possess his lawfully purchased guns, extorting Tavares of more than US \$100,000.00 in legal costs to defend patently sham proceedings, including in the Double Jeopardy FRAGA II sham case, and totally traumatizes Tavares, changing his personal and working habits and relationships in order to avoid new schemes to falsely incriminate Tavares, since the Criminal Enterprise does not follow, and is not accountable – to this date, to the laws of the land. Fraga, as an illegal alien working for the Criminal Enterprise, is likely lead into the scheme by their threats to follow the criminal scheme – and rewarded by getting continued work from the Criminal Enterprise, and eventually receiving other compensations, including properties. Implicated attorney Marcia Del Rey is rewarded for furthering the criminals schemes upon courts of law, like many other reckless attorneys corrupted by the Criminal Enterprise, by, among other things, been supported to the judicial bench, thus becoming another Criminal Enterprise's corrupted and fatally compromised judge, like, Allan Lester Langer a.k.a. Lester Langer ("Judge Langer") (Florida Bar No. 137.828), Alan Samuel Fine ("Judge Fine") (Florida Bar No. 385.824)), Norma Shepard Lindsey ("Judge Lindsey") (Florida Bar No. 994.812), *et al.*, and then, upon retirement, are supported with perks provided by the Criminal Enterprise's flow of illicit businesses and proceeds from frauds, swindles and extortion upon national institutions in the United States of America, and elsewhere they operate, further negatively affecting the perception of justice and the judiciary in the United States of America, undermining the rule of law and our democracy.

COUNTS APROX. DATE VIOLATIONS PERPETRATORS

24	November 5, 2012	<p align="center"><u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the United States of America &</p>	<p>Judge Joseph I. Davis, Jr. Criminal Enterprise</p>
25		<p align="center">§ 242 Deprivation of Rights Under Color of Law &</p>	
26		<p align="center">FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1; 2; and 3</p>	

On or about November 5, 2012, after Judge Davis Jr. presides a sham hearing in the FRAGA II Double Jeopardy sham case, as part of a criminal scheme to falsely incriminate Tavares with false, fabricated, vague, and contradictory allegations, he signs a bogus order denying Fraga’s requested relief without prejudice, after stating to Fraga that, “When I say I’m dismissing it without prejudice, that’s the way I dismissed your previous case [FRAGA I] that was before me not too long ago in July. Without prejudice means that in the event that there is some conduct by Mr. Tavares that would warrant you filing another case for domestic violence, the courthouse door is still open for you to do that,” see Tr. 11/05/2012 at 27 ¶¶ 17 – 25, in order to leave the doors of the subverted court open to the Criminal Enterprise to keep systematically harassing, extorting, and depriving Tavares’s of his rights and properties, under color of law, without any regards for courts of law in the United States of America, the State of Florida, the rule of law and constitutional rights. See Order of November 5, 2012 below:

“IN THE CIRCUIT COURT FOR THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR DADE COUNTY, FLORIDA
 DOMESTIC REPEAT VIOLENCE DIVISION

Case No. 12-024483-FC-04

ORDER OF DISMISSAL PURSUANT TO SECTION 741.30 OR 784.046 FLORIDA STATUTES

THIS CAUSE came to be heard on this November 5, 2012, on the Petitioner’s motion and appearing that: NO JUST CAUSE: Upon review, the evidence presented is insufficient under Florida law (section 741.30 or 784.046; Florida Statutes) to allow the Court to issue an injunction for protection against domestic, repeat, dating or sexual violence, it is therefore ORDERED and ADJUDGED that this cause is hereby DISMISSED **without prejudice**.

DONE and ORDERED at Date County, Florida, this day of November 5, 2012.

/s/ Joseph I. Davis, Jr.

Joseph I. Davis, JR. – Acting Circuit Judge” See Order of 11/05/2012.

Judge Davis Jr., showing his loyalty to the Criminal Enterprise, throughout the sham FRAGA I, and FRAGA II, proceedings, knowingly and intentionally, systematically fails to grant Tavares's motions to forward the matter for systematic perjury before the court by Fraga to the State Attorney's Office, among other motions, Tavares's "Respondents Motion to Dismiss the Case with Prejudice and Move the Court to Forward this Matter to the Florida State Attorney's Office for Investigation and Prosecution for Perjury, False, Fabricated and Malicious Allegations by Geania A. Fraga Petitioner Against Charles A. Tavares Respondent." See Tavares's Motion

COUNTS

Count 24- Judge Davis Jr., and other Perpetrators implicated, they did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to 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 upon the courts, in violation of 18 U.S.C. §371.

Count 25- Shameless Judge Davis Jr., and other officers of the courts implicated, did knowingly and intentionally, systematically deprived and extorted Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 26- Shameless Judge Davis Jr., repeatedly and systematically violates his sworn oath as judge, and Florida Judicial Canons 1, 2, and 3, by among other things, knowingly and intentionally, participating in a criminal scheme subverting his court to further violations and extortion of Tavares's rights and properties, under color of law, and systematically breaking the law, undermining the trust of the public in the judicial system and our democracy predicated in the rule of law.

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 27 - 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 28 - 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 29 - 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 30 - 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 31 - 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 integrated⁵ 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 tax⁶ 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

COUNTS

Count 28 - 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 29 - 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 30 - 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 31 - 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 32 - 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 33 - 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