

**THE CONTINUED CRIMINAL ENTERPRISE & BNY MELLON’S SCHEME TO DEPRIVE CHARLES TAVARES OF ALL PROPERTIES AND RIGHTS UNDER COLOR OF LAW ON CASE 2009-93058-CA-30 FURTHERING UNDERLYING SCHEMES DEFRAUDING THE USA AND THE STATE OF FLORIDA**

**COUNTS      APROX. DATE    VIOLATIONS    PERPETRATORS**

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
1	<b>From at Least on or Around August 5, 2003 Through in or around 2024 and continuing</b>	<b><u>U. S. CODE TITLE 18</u></b>	<a href="#"><u>Marco Emilio Rojas</u></a>
2		§ 371 Conspiracy to Defraud the USA &	Stepehen Ames Freeman Nicholas Stanham
3		§ 241 Conspiracy Against Rights &	Robert Michael Haber Freman Haber Rojas & Stanham
4		§ 1346 Scheme/Artifice to Defraud &	Gabriela M. Machado Guimaraes <a href="#"><u>Nelson Slosbergas</u></a>
5		§ 1349 Conspiracy to Defraud &	Joseph Horn Ralph Horn
6		§ 1961 <i>et seq.</i> – RICO &	Ricardo Eichenwald Bridgeloan Investors, Inc.
7		<b><u>FLORIDA STATUTES</u></b> Title XLVI §817.155 - Fraudulent Practices & <b><u>FLORIDA BAR RULES OF CONDUCT</u></b> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Hugo Barreto Del Priore BANIF Securities, Inc. The Criminal Enterprise (CCE)

From August 5, 2003, and continuing to this date, a Transnational Continued Criminal Enterprise<sup>1</sup> (“Criminal Enterprise” or “CCE”), as part of an underlying criminal scheme to deprive and extort U.S. citizen and victim Charles Tavares (“Tavares”) of all properties and rights, under color of law, upon subverted proceedings upon Miami Courts, entraps Tavares and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) in a sham representation by the CCE’s Associates.<sup>2</sup> At all relevant times, the CCE’s Associates, systematically undermine Tavares’ management of 139 TH, by, *e.g.*, spreading false rumors about Tavares, willfully devaluing 139 TH’s Properties, coercing Members to stop funding 139 TH, coercing Tavares to sell 139 TH cheap to the CCE’s Associates [ODEBRECHT](#) (“[ODEBRECHT](#)”), and AHS Residential, LLC a.k.a. [RESIA, LLC](#) (“RESIA”), sabotaging a Lowe’s sale, and fabricating sham membership indicia to hijack 139 TH to steal all assets.

<sup>1</sup> The CCE is comprised of, *inter alia*, Associates, , [Stephen A. Freeman](#) (“Freeman”) (Fla. Bar No. 146.795), [Nelson Slosbergas](#) (“Slosbergas”) (Fla. Bar No. 378.887), [Robert M. Haber](#) (“Haber”) (Fla. Bar No. 131.614), [Marco E. Rojas](#) (“[Rojas](#)”) (Fla. Bar No. 940.453), and [Nicholas Stanham](#) (“[Stanham](#)”) (Fla. Bar No. 38.822), using their Florida Bar licenses as guise to structure and [commit major criminal schemes](#), together with bad actors in the real estate and financial markets, including, *inter alia*, [Joseph Horn](#) (“Horn”), Ralph Horn (“Horn”), and Ricardo Eichenwald (“Eichenwald”), at [Bridgeloan Investors, Inc., a Florida corp.](#) (Tax ID. #65-0665516), Horn Eichenwald Investments, Corp., a Florida corp. (Tax Id. #65-0763197), Bridgeloan Partners Corp., a Florida corp. n.k.a. H2A Capital Corp., a Florida corp. (Tax Id. #86-3280908), and [Bridgeinvest, LLC, a Florida L.L.C.](#) (Tax Id. #45-3188071)(collectively “[BRIDGELOAN](#)”). Some of their long ongoing running criminal rackets include, [intercontinental money laundering](#) of billions of dollars of illicit funds through the United States of America, tax frauds, portfolio tax-free bond frauds, major mortgage and bank fraud, systematic deprivation and extortion of U.S. citizens and companies, and the subversion and corruption of the judicial and political machinery in Florida, and elsewhere they operate, furthering underlying schemes with absolute impunity, undermining the rule of law and our democracy, preventing justice. See [Tavares’ Sworn Affidavit](#).

<sup>2</sup> Rojas, a shameless criminal using his Florida Bar licenses to further schemes, [represents in fatal conflict](#), 139 TH’s Members Tavares, [Francisco Alfonso Mesa Schuler](#) (“Francisco Mesa”), Rojas & Stanham, further drafting 139 TH’s Shareholders’ Agreement of September 16, 2003, representing Tavares’ 139 TH for years, [covertly undermining Tavares’ management](#), *bona fide* deals, *e.g.*, from [Lowe’s Home Improvement \(Lowe’s\)](#) & [implicated Katz Barron](#), to extort Tavares’ properties and rights.

## COUNTS

**Count 1** - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 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 U.S. citizen Charles 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, *inter alia*, the right to property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation, and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 3** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 4**– The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 5** - At all times relevant, Marco Emilio Rojas, Stephen Ames Freeman, Nicholas Stanham, Robert Michael Haber, Freeman Haber Rojas & Stanham, LLP, Gabriela Maranhao Machado Guimaraes (D.O.B. 08/17/1965), Nelson Slosbergas, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Bridgeloan Investors, Inc., Hugo Barreto Del Priore (“Del Priore”), BANIF Securities, Inc., a Cayman Islands company (“BANIF”), and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 6** – Shameless criminals Marco Emilio Rojas, Stephen Ames Freeman, Nicholas Stanham, Robert Michael Haber, Freeman Haber Rojas & Stanham, LLP, Gabriela Maranhao Machado Guimaraes (D.O.B. 08/17/1965), Nelson Slosbergas, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Bridgeloan Investors, Inc., Hugo Barreto Del Priore (“Del Priore”), BANIF Securities, Inc., a Cayman Islands company (“BANIF”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting client Charles Tavares, furthering schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**Count 7** – Shameless criminals Marco Emilio Rojas, Stephen Ames Freeman, Nicholas Stanham, Robert Michael Haber, and other Perpetrators implicated, knowingly and intentionally using their [Florida Bar](#) licenses as guise to systematically and repeatedly commit crimes, willfully participating in a known scheme, in fatal conflict of interest, knowingly and intentionally depriving and extorting client Charles Tavares (“Tavares”) of all properties and rights, systematically corrupting and subverting other officers of the court, subverting the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”) to further underlying criminal schemes of intercontinental money laundering of ill-gotten proceeds, engaging and dealing with properties derived from specified unlawful activity, systematically committing mortgage, bank, and securities frauds, perpetrating major tax fraud schemes – continuously for more than twenty (20) years, and continuing, against the State of Florida and the United States of America, and depriving the United States and the State of Florida of honest services, in violation of, *inter alia*, §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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at [www.floridabar.org](http://www.floridabar.org).

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

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

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

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

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

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



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

On September 15, 2011, as part of an ongoing underlying scheme by a Continued Criminal Enterprise\* (“Criminal Enterprise” or “CCE”), 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 \$20 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](#).

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

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

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

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

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

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



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

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

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

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

On October 3, 2012, the Criminal Enterprise, following the dismissal, on July 11, 2012, of the previous fabricated sham FRAGA I case, see Case No. 2012-03753-FC-04, upon the subverted Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), showing an absolute disregard for the law, the constitution, and Tavares’s rights, file, with unclean hands, a second fabricated sham Domestic Repeat Violence Case against Charles Tavares (“Tavares”), the *Geania A. Fraga v. Charles Tavares* (the Double-Jeopardy “**FRAGA II**” case), Case No. 2012-24483-FC-04. The Fraga II sham case is filed through the same bad actor, Geania A. Fraga (“Fraga”), a Manager/Agent of BRIDGELOAN/ BANIF, by criminals Peter F. Valori’s (“Peter”) (Florida Bar No. 43.516), and Russell Marc Landy (“Landy”) (Florida Bar No. 44.417), Damian & Valori, LLP a.k.a. Damian Valori | Culmo (“Valori”), Gabriela Maranhao Machado Guimaraes (“Guimaraes”), and supported by false witnesses Martiza C. Calix (“Calix”), and Dunia Irene Pacheco (“Pacheco”), represented by reckless 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 Joseph 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, the State of Florida, U.S. citizens, and companies, with absolute impunity. See Record.

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

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

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

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

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

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

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

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

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

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

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

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

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
8	February 13, 2014	<b>U. S. CODE TITLE 18</b>	ODEBRECHT
9		§ 371 Conspiracy to Defraud the USA	Hugo Barreto Del Priore
10		&	BANIF Securities, Inc.
11		§ 241 Conspiracy Against Rights	Joseph Horn
12		&	Ralph Horn
13		§ 1346 Scheme/Artifice to Defraud	Ricardo Eichenwald
14		&	Fernando Braghin
15		§ 1343 Wire Fraud	Nelson Slosbergas
		&	Bridgeloan Investors, Inc.
		§ 1349 Conspiracy to Defraud	Marco Emilio Rojas
		&	Nicholas Stanham
		§ 1951 Extortion (Hobbs Act)	Peter Francis Valori
		&	Russell Marc Landy
		§ 1961 <i>et seq.</i> – RICO	Damian & Valori LLP
		&	Gabriela M. Machado Guimaraes
	<b>FLORIDA STATUTES</b>	The Continued Criminal Enterprise	
	Title XLVI § 817.155 Fraudulent Practices		

On February 13, 2014, to further a continued and ongoing underlying criminal scheme by Bridgeloan Investors, Inc.'s ("BRIDGELoAN") Transnational Continued Criminal Enterprise<sup>3</sup> ("CCE" or "Criminal Enterprise"), depriving and extorting U.S. victim Charles Tavares ("Tavares") of all properties and rights, Associate<sup>4</sup> Hugo Barreto Del Priore ("Del Priore") transmits an [email](#) ("**Sham ODEBRECHT Email**") to Tavares, as the sole manager, director, and the 52% majority Member of Tavares' 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH"), relating to ODEBRECHT's "Setor" Department<sup>5</sup> ("ODEBRECHT") interest in buying Tavares' 139 TH's 29 Acres Property in Miami, Florida (the "Property"). At all relevant times, Del Priore, together with the CCE's Associates, *inter alia*, ODEBRECHT, Bridgeloan Investors, BANIF, Joseph Horn ("Horn"), Ralph Horn ("Ralph"), Ricardo Eichenwald (Eichenwald"), [Marco E. Rojas](#) ("Rojas"), Nelson Slosbergas ("Slosbergas"), Stephen Ames Freeman ("Freeman"), Robert M. Haber ("Haber"), Nicholas Stanham ("Stanham"), and Gabriela Maranhao Machado Guimaraes ("Guimaraes"), are conspiring, jointly and together to deprive and extort Tavares of all properties and rights.

<sup>3</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn's](#) ("Horn") Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities' fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank's](#) ("BANIF") corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>4</sup> Del Priore, a former CEO and Director of, *inter alia*, BANIF Mortgage Company ("BANIF"), and one of the masterminds of the scheme defrauding BANIF of more than \$800 million dollars under custody of UBS Financial, is covertly using sham Offshore entities— now [domesticated into Florida companies](#) to tax defraud and money launder ill-gotten proceeds, *e.g.*, Rumo Business Ltd. (Cayman), M4 Investments, Ltd. (Cayman), and Pebblestone Worldwide Ltd. (B.V.I.), as Members of 139 TH to defraud.

<sup>5</sup> The CCE has joined forces with some of Brazil's largest real estate developers and builders, *inter alia*, Horn's family Cyrela Brazil Realty ("Cyrela"), [ODEBRECHT's offshoots after the US DOJ investigates Global Schemes](#), BANIF's offshoots ("BANIF"), and AHS Residential, LLC, a Florida L.L.C. a.k.a. RESIA, LLC, a Florida L.L.C. a.k.a. MRV Engenharia (Brazil) (collectively "RESIA"), and major enablers, *inter alia*, [Wolters Kluwer](#) a.k.a. CT Corporate Services ("Wolters Kluwer"), The Bank of New York Mellon ("BNY Mellon"), and an international global alliance of reckless law firms structuring global tax fraud schemes, bank schemes, and money laundering of corruption and ill-gotten proceeds through the United States of America, undermining the rule of law, corrupting national institutions, and subverting our democracy to prevent justice and cover up Transnational schemes.



## COUNTS

**Count 8** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 9**- 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 Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 10** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 11** - The Perpetrators implicated, to further known underlying schemes subverting Florida courts to steal, deprive, and extort Charles Tavares of rights and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, use wires for the purpose of executing schemes, in violation of Title 18 U.S.C. §1343.

**Count 12**– The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 13** - The Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares ("Tavares") of properties and rights, to further a continuous scheme depriving stealing, and extorting all of Tavares' properties and rights, and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 14**- At all times relevant, The Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and

Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

**Count 15** – The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting U.S. citizen Charles Tavares, and furthering schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
16	May 27, 2015	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Peter Francis Valori Russell Marc Landy Damian & Valori LLP
17		§ 241 Conspiracy Against Rights &	Gabriela M. Machado Guimaraes <a href="#">Integra Solutions, LLC</a>
18		§ 1346 Scheme/Artifice to Defraud &	Marco Emilio Rojas Nicholas Stanham
19		§ 1343 Wire Fraud &	R&S International Law Group, LLP Hugo Barreto Del Priore
20		§ 1349 Conspiracy to Defraud &	BANIF Securities, Inc. Joseph Horn
21		§ 1951 Extortion (Hobbs Act) &	Ralph Horn Ricardo Eichenwald
22		§ 1961 <i>et seq.</i> – RICO &	Fernando Braghin Nelson Slosbergas
23		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On May 27, 2015, one of Charles Tavares' ("Tavares") partners in 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH"), Francisco Alfonso Mesa Schuler ("Francisco Mesa"), informed Tavares that, 139 TH's attorney, and an Associate of a Transnational Criminal Enterprise<sup>6</sup> ("CCE") Marco E. Rojas ("Rojas") (Florida Bar No. 940.453),<sup>7</sup> together with Associates Peter F. Valori ("Peter") (Florida Bar No. 43.516), at Damian & Valori, LLP a.k.a. Damian Valori | Culmo ("Valori"), and Gabriela M. Machado Guimaraes ("Guimaraes") (D.O.B. 08/17/ 1965, in Brazil), summoned Francisco Mesa for a meeting at Valori's offices,<sup>8</sup> were Francisco Mesa is repeatedly intimidated and coerced to conspire together with Rojas, Peter and Guimaraes, to, *inter alia*, agree to a scheme to improperly remove Tavares as sole manager and director of Tavares' 139 TH. After Francisco Mesa relates the conspiracy to Tavares, Tavares, as 139 TH's sole manager and director, submits a [Demand Letter](#) of May 29, 2015, demanding the Perpetrators to stop their willful torts and interference in the business of the company, and noting previous Demands predicated on reports by other Members of Rojas, Peter, Guimaraes, *et al.*'s systematic interference to extort 139 TH's Properties.<sup>9</sup> At all relevant times, the Perpetrators know they are conspiring together to extort Tavares of all properties and rights, including Tavares' 139 TH's Properties. See [Tavares' Affidavit](#).

<sup>6</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn's](#) ("Horn") Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities' fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank's](#) ("BANIF") corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>7</sup> [Rojas](#), is a longtime criminal, systematically perpetrating mortgage, bank, and portfolio tax-free bond frauds, [money laundering corruption and drug monetary instruments](#) through the United States, representing clients in an intentional conflict of interest to extort unsuspecting clients of properties and rights, systematically fabricating and forging indicia of membership and records, and structuring tax fraud schemes for Associates, to systematically defraud the United States of America, *et al.*

<sup>8</sup> Shameless criminals Peter and Rojas' law firms, are based at the same building, at 1000 Brickell Avenue, Miami, FL 33131, to make it easier for them to perpetrate major schemes against the United States of America, the State of Florida, and clients.

<sup>9</sup> In September 2003, Tavares negotiated the purchase 139 TH's 29 Acres Properties for \$1.6 million, and through vision, hard work, and ingenuity, increased the value, obtaining in 2005, a \$8 million contract to sell to [Lowe's Home Improvement](#). Unknown to Tavares at the time, Rojas, *et al*, sabotage the deal to [prevent the sale](#), to allow Rojas to hijack 139 TH, and steal.

## 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**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 Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation, and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 18** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 19** - The Perpetrators implicated, to further known underlying schemes subverting Florida courts to steal, deprive, and extort Charles Tavares of rights and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, use wires for the purpose of executing schemes, in violation of Title 18 U.S.C. §1343.

**Count 20**– The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 21** - The Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares ("Tavares") of properties and rights, to further a continuous scheme depriving stealing, and extorting all of Tavares' properties and rights, and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 22**- At all times relevant, The Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and

Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

**Count 23** – The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting U.S. citizen Charles Tavares, furthering schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).



**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
24	<b>November 14, 2015 At 12:15 PM</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Steven Carlyle Cronig Hinshaw & Culbertson, LLP
25		§ 241 Conspiracy Against Rights &	Peter Francis Valori Russell Marc Landy
26		§ 1346 Scheme/Artifice to Defraud &	Damian & Valori LLP Gabriela M. Machado Guimaraes
27		§ 1341 Mail Fraud &	<a href="#">Integra Solutions, LLC</a> Marco Emilio Rojas
28		§ 1349 Conspiracy to Defraud &	Hugo Barreto Del Priore BANIF Securities, Inc.
29		§ 1951 Extortion (Hobbs Act) &	Joseph Horn Ralph Horn
30		§ 1961 <i>et seq.</i> – RICO &	Ricardo Eichenwald Fernando Braghin
31		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Nelson Slosbergas Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On November 15, 2015, one of Charles Tavares' ("Tavares") partners in 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH"), Leonardo Fabian Altstut<sup>10</sup> ("Leo Altstut"), informed Tavares, and submitted an email with a copy of a Letter from attorney Steven Carlyle Cronig ("Cronig") (Florida Bar No. 307.068 and New York Bar No.4.977.419), at Hinshaw & Culbertson, LLP ("Hinshaw") coercing Members to unduly remove Tavares, the founder, sole manager and director, and the 52% majority interest holder of 139 TH, to allow Bridgeloan Investors, Inc.'s ("BRIDGELOAN") Transnational Criminal Enterprise<sup>11</sup> ("CCE"). Tavares, as 139 TH's sole legal authority, submits, via Certified U.S. Postal Mail and E-mail, a Demand Letter to Cronig and Hinshaw to immediately cease and desist their reckless actions, knowingly and intentionally interfering in the business of 139 TH, conspiring jointly and together with Associates of the CCE, among others, with Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/15/1965, in Brazil), Marco Emilio Rojas (Rojas") (Florida Bar No. 940.453), and Peter F. Valori ("Peter") (Florida Bar No. 43.516). At all relevant times, the Perpetrators know they are conspiring together to deprive, steal, extort Tavares of all properties and rights in 139 TH,<sup>12</sup> and in other related schemes. [See Tavares' Affidavit](#). The shameless criminals of the CCE, systematically abuses the openness of America's business' ecosystem to perpetrate major frauds against the United States, U.S. citizens and companies.

<sup>10</sup> Altstut, months after disclosing Hinshaw's conspiracy to unduly remove Tavares, reports to Tavares that Altstut is extorted of \$500,000 dollars in a project in Kissimmee, Florida, by the CCE's Nelson Slosbergas ("Slosbergas"), *et al.*, silencing Altstut.

<sup>11</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn's](#) ("Horn") Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities' fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank's](#) ("BANIF") corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>12</sup> The CCE, systematically perpetrating torts, concurrently, causes intimidated and corrupted Members to continuously unduly withhold required capital contributions – for example unduly withholding in 2015, about \$134,452, depriving 139 TH of funds to, *e.g.*, timely pay property taxes, causing Tavares to personally supplement funds, willfully causing financial distress, and systematically poisoning the Membership and Tavares' management, further devaluing 139 TH's Properties before the market.

## COUNTS

**Count 24** - Steven Carlyle Cronig (“Cronig”) (Florida Bar No. 307.068 and New York Bar No.4.977.419), at Hinshaw & Culbertson, LLP (“Hinshaw”), and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 25**- Steven Carlyle Cronig (“Cronig”) (Florida Bar No. 307.068 and New York Bar No.4.977.419), at Hinshaw & Culbertson, LLP (“Hinshaw”), and other 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 Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 26** - Steven Carlyle Cronig (“Cronig”) (Florida Bar No. 307.068 and New York Bar No.4.977.419), at Hinshaw & Culbertson, LLP (“Hinshaw”), and other 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 Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 27** - Steven Carlyle Cronig (“Cronig”) (Florida Bar No. 307.068 and New York Bar No.4.977.419), at Hinshaw & Culbertson, LLP (“Hinshaw”), at 2525 Ponce de Leon Boulevard, 4<sup>th</sup> Floor, Coral Gables, Florida 33134, and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, transmits, to further criminal schemes coercing and extorting, a Sham Letter via U.S. Postal Mail, to, *inter alia*, Leonardo Fabian Altstut at Proa, LLC, a Florida L.L.C., at 110 Washington Avenue, #2308, Miami Beach, Florida 33133, for the purpose of executing schemes, in violation of Title 18 U.S.C. §1341.

**Count 28**– Steven Carlyle Cronig (“Cronig”) (Florida Bar No. 307.068 and New York Bar No.4.977.419), at Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 29** - Steven Carlyle Cronig (“Cronig”) (Florida Bar No. 307.068 and New York Bar No.4.977.419), at Hinshaw & Culbertson, LLP (“Hinshaw”), other Perpetrators, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 30**- At all times relevant, Steven Carlyle Cronig (“Cronig”) (Florida Bar No. 307.068 and New York Bar No.4.977.419), at Hinshaw & Culbertson, LLP (“Hinshaw”), and Perpetrators, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 31** – Steven Carlyle Cronig (“Cronig”) (Florida Bar No. 307.068 and New York Bar No.4.977.419), at Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
32	<b>April 6, 2017</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Francisco Alfonso Mesa Schuler Image International Invest., Inc. Peter Francis Valori
33		§ 241 Conspiracy Against Rights &	Damian & Valori LLP Gabriela M. Machado Guimaraes
34		§ 1346 Scheme/Artifice to Defraud &	<a href="#">Integra Solutions, LLC</a> Marco Emilio Rojas
35		§ 1343 Wire Fraud &	Nicholas Stanham Hugo Barreto Del Priore
36		§ 1349 Conspiracy to Defraud &	BANIF Securities, Inc. Joseph Horn
37		§ 1951 Extortion (Hobbs Act) &	Ralph Horn Ricardo Eichenwald
38		§ 1961 <i>et seq.</i> – RICO &	Fernando Braghin Nelson Slosbergas
39		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. The Continued Criminal Enterprise

After years of continued and systematic tortious business interference with an Advantageous Business Relationship<sup>13</sup> in 139TH Avenue S. W. 8 Street, LLC, a Florida L.L.C. (“139 TH”), by, among others, Marco Emilio Rojas (Rojas”) (Florida Bar No. 940.453), Nicholas Stanham (“Stanham”) (Florida Bar No. 38.822), Tamiami Trail Partners, LLC, a Florida L.L.C. (“Tamiami”) (Tax Id. #65-1202863), Francisco Alfonso Mesa Schuler (“Francisco Mesa”), and Image International Investments, Inc., a Florida corporation (“Image”) (Tax Id.# 65-12022885), furthering an underlying scheme by Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise<sup>14</sup> (“CCE” or “Criminal Enterprise”), depriving and extorting Tavares of all properties and rights upon sham proceedings in subverted courts in the Eleventh Judicial Circuit in Miami-Dade County, Florida (“Miami Courts”), continue, knowingly and intentionally, withholding payment of ordinary capital contributions<sup>15</sup> required under 139 TH’s Operating Agreement, to willfully cause financial distress and sabotage Tavares’ management of 139 TH, allowing the Perpetrators to further the scheme to hijack and steal 139 TH’s Properties. At all relevant times, the Perpetrators know they are conspiring together to deprive, steal, and extort Tavares of properties and rights in 139 TH, and furthering an underlying scheme extorting Tavares of all properties and rights in related schemes.

<sup>13</sup> CCE’s Associate Rojas, a longtime criminal, uses his Florida Bar license as guise to systematically commit crimes, *inter alia*, mortgage, bank, portfolio tax-free bond frauds, [intercontinental money laundering of drug](#), corruption and ill-gotten monetary instruments through the United States of America, tax frauds, systematically fabricating and forging corporate resolutions and *indicia of membership* fraudulently signed by, among others, Rojas, [Rojas’ office janitors and cleaners](#), and now, [copying/pasting](#) signatures from previous schemes from bad actors in offshore havens, *inter alia*, in the Republic of Panamá, and willfully representing unsuspecting clients in conflict of interest, easily extorting clients of properties and rights. See [Tavares’ Affidavit](#).

<sup>14</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>15</sup> On April 6, 2017, Tavares, as sole manager and director of 139 TH, submits another request to [Members Rojas](#), Stanham, and Francisco Mesa to fulfill their obligations to 139 TH, as [Rojas](#) owes \$1,790.00, and [Francisco Mesa](#) owes \$8,100.00.

## COUNTS

**Count 32** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 33-** 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 Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 34** - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 35** - The Perpetrators, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares ("Tavares") and Tavares' company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH") of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, using wires for the purpose of executing schemes, in violation of Title 18 U.S.C. §1343.

**Count 36-** The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 37** - The Perpetrators, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares ("Tavares") of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares' properties and rights, and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 38-** At all times relevant, the Perpetrators, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the



affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, [Record and Tavares Sworn Affidavit](#).

**Count 39** – The Perpetrators, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

40	<b>August 9, 2017 at 10:00 AM</b>	<b>U. S. CODE TITLE 18</b>	Hugo Barreto Del Priore Ernesto Pereira Lopes Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC Marco Emilio Rojas Nicholas Stanham Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Nelson Slosbergas Bridgeloan Investors, Inc. The Continued Criminal Enterprise
41		§ 371 Conspiracy to Defraud the USA &	
42		§ 241 Conspiracy Against Rights &	
43		§ 1346 Scheme/Artifice to Defraud &	
44		§ 1343 Wire Fraud &	
45		§ 1349 Conspiracy to Defraud &	
46		§ 1951 Extortion (Hobbs Act) &	
47	§ 1961 <i>et seq.</i> – RICO & <b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices		

On August 9, 2017 at 10:00 a.m., in furtherance of an underlying criminal scheme by Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise<sup>14</sup> (“CCE” or “Criminal Enterprise”), depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, see [Tavares’ Affidavit](#), Hugo Barreto Del Priore<sup>15</sup> (“Del Priore”), a CCE’s Associate, transmits, via electronic mail, a sham [Letter of Intent to Purchase for \\$3 million](#)<sup>16</sup> (“[Sham Offer](#)”), Tavares’ 139 TH Avenue SW 8 Street, LLC’s (“139 TH”) Properties (“Properties”) from the CCE’s Associate AHS Development Group, LLC, a Florida L.L.C. (Tax Id. #46-0844516) a.k.a. RESIA, LLC (“RESIA”),<sup>17</sup> a company controlled by [Ernesto Pereira Lopes](#) (“Lopes”) [Rubens Menin Teixeira de Souza](#) (“Rubens Menin”). At all relevant times, Del Priore is conspiring with other Perpetrators to deprive and extort Tavares of properties and rights, and to further the scheme, falsely states, *e.g.*, “Please note that AHS Development Group is a potential buyer with good credibility and solid financial position”, when in truth and in fact, Del Priore knows that AHS’s Sham Offer is an artifice to deprive and extort Tavares’ of properties and rights, and to defraud 139 TH.

<sup>14</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>15</sup> Del Priore, a former CEO and Director of, *inter alia*, BANIF Mortgage Company (“BANIF”), and one of the masterminds of the scheme defrauding BANIF of more than \$800 million dollars under custody of UBS Financial, covertly uses sham Offshore entities— now [domesticated into Florida companies](#) to tax defraud and money launder ill-gotten proceeds, *e.g.*, Rumo Business Ltd. (Cayman), M4 Investments, Ltd. (Cayman), and Pebblestone Worldwide Ltd. (B.V.I.), as Members of 139 TH to defraud, and previously had attempted, on February 13, 2014, to extort Tavares to sell 139 TH’s Properties to the [CCE’s Associate ODEBRECHT](#).

<sup>16</sup> 139 TH’s 29 Acres Property at 13900 SW 8 Street, Miami, Florida, at the that time, has a market value of around \$15 million.

<sup>17</sup> [RESIA](#) is a company controlled by [Lopes](#) – a former director of [ODEBRECHT](#), and by Rubens Menin, owner of, among other companies, [MRV Engenharia](#) (“MRV” Brazil) and Bank INTER (“[Banco Inter](#)” Brazil).

## COUNTS

**Count 40** - Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 41**- Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 42** - Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 43** - Hugo Barreto Del Priore (“Del Priore”) (hdelpriore@argonpart.com.br), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, use electronic mail, to wit, a certain email of August 9, 2017, at 10:00 AM, from Del Priore to victim Tavares (ctavares@bellsouth.net), for the purpose of executing schemes, in violation of Title 18 U.S.C. §1343.

**Count 44**– Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 45** - Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 46-** At all times relevant, Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 47 –** Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

48	<b>August 14, 2017 at 12:01 PM</b>	<b><u>U. S. CODE TITLE 18</u></b>	Hugo Barreto Del Priore Ernesto Pereira Lopes Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC Marco Emilio Rojas Nicholas Stanham Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Nelson Slosbergas Bridgeloan Investors, Inc. The Continued Criminal Enterprise
49		§ 371 Conspiracy to Defraud the USA &	
50		§ 241 Conspiracy Against Rights &	
51		§ 1346 Scheme/Artifice to Defraud &	
52		§ 1343 Wire Fraud &	
53		§ 1349 Conspiracy to Defraud &	
54		§ 1951 Extortion (Hobbs Act) &	
55		§ 1961 <i>et seq.</i> – RICO & <b><u>FLORIDA STATUTES</u></b> Title XLVI § 817.155 Fraudulent Practices	

On August 14, 2017 at 12:01 p.m., in furtherance of an underlying criminal scheme by Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise<sup>18</sup> (“CCE” or “Criminal Enterprise”), depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, see [Tavares’ Affidavit](#), Hugo Barreto Del Priore<sup>19</sup> (“Del Priore”), a CCE’s Associate, transmits, via electronic mail, Sham Responses (“**Sham Responses**”) relating to a sham Letter of Intent of August 4, 2017, to Purchase for \$3 million<sup>20</sup> (“Sham Offer”), Tavares’ 139 TH Avenue SW 8 Street, LLC’s (“139 TH”) Properties (“Properties”) from the CCE’s Associate AHS Development Group, LLC, a Florida L.L.C. (Tax Id. #46-0844516) a.k.a. RESIA, LLC (“RESIA”),<sup>21</sup> a company controlled by [Ernesto Pereira Lopes](#) (“Lopes”), and [Rubens Menin Teixeira de Souza](#) (“Rubens Menin”). At all relevant times, Del Priore is [conspiring with other Perpetrators](#) to deprive and extort Tavares of properties and rights, and knows in truth and in fact, that AHS’s Sham Offer is an artifice to deprive and extort Tavares’ of properties and rights, and to defraud 139 TH, furthering underlying schemes by the CCE, depriving and extorting Tavares of all properties and rights. Del Priore’s Sham Responses state, *inter alia*, AHS “*is a potential buyer with good credibility,*” when they all know in truth and in fact that, the Sham Offer is an artifice to extort Tavares of properties and rights.

<sup>18</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>19</sup> Del Priore, a former CEO and Director of, *inter alia*, BANIF Mortgage Company (“BANIF”), and one of the masterminds of the scheme defrauding BANIF of more than \$800 million dollars under custody of UBS Financial, covertly uses sham Offshore entities– now [domesticated into Florida companies](#) to tax defraud and money launder ill-gotten proceeds, *e.g.*, Rumo Business Ltd. (Cayman), M4 Investments, Ltd. (Cayman), and Pebblestone Worldwide Ltd. (B.V.I.), as Members of 139 TH to defraud.

<sup>20</sup> 139 TH’s 29 Acres Property at 13900 SW 8 Street, Miami, Florida, at the that time, has a market value of around \$15 million.

<sup>21</sup> [RESIA](#) is a company controlled by [Lopes](#) – a former director of [ODEBRECHT](#), and by Rubens Menin, owner of, among other companies, [MRV Engenharia](#) (“MRV” Brazil) and Bank INTER (“[Banco Inter](#)” Brazil).

## COUNTS

**Count 48** - Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 49**- Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 50** - Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 51** - Hugo Barreto Del Priore (“Del Priore”) (hdelpriore@argonpart.com.br), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, use electronic mail, to wit, a certain email of August 14, 2017, at 12:01 AM, from Del Priore to victim Tavares (ctavares@bellsouth.net), for the purpose of executing schemes, in violation of Title 18 U.S.C. §1343.

**Count 52**– Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 53** - Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights,



and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 54-** At all times relevant, Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

**Count 55 –** Hugo Barreto Del Priore (“Del Priore”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
56	<b>March 16, 2018</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Nelson Slosbergas Nelson Slosbergas, P.A. NS Corporate Services, Inc.
57		§ 241 Conspiracy Against Rights &	Hugo Barreto Del Priore Ernesto Pereira Lopes
58		§ 1346 Scheme/Artifice to Defraud &	Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC
59		§ 1343 Wire Fraud &	Marco Emilio Rojas Nicholas Stanham
60		§ 1349 Conspiracy to Defraud &	Gabriela M. Machado Guimaraes <a href="#">Joseph Horn</a>
61		§ 1951 Extortion (Hobbs Act) &	Ralph Horn Ricardo Eichenwald
62		§ 1961 <i>et seq.</i> – RICO &	Fernando Braghin Bridgeloan Investors, Inc.
63		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise

On March 16, 2018, Bridgeloan Investors, Inc.'s Transnational Continued Criminal Enterprise's<sup>22</sup> ("CCE" or "Criminal Enterprise") Associate Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), using his bar license as guise to intimidate, coerce, deprive, and extort, transmits, Via E-mail, a fabricated false and invalid Statement of Written Consent of Charles Tavares' ("Tavares") 139TH Avenue SW 8 Street, LLC's ("139 TH") ("**First Sham Resolution of March 16, 2018**"), to improperly and invalidly<sup>23</sup> remove Tavares as 139 TH's sole manager, president, director, and registered agent. Criminal Slosbergas'<sup>24</sup> email, with an attachment of the First Sham Resolution of March 16, 2018, states, to Tavares, and Tavares' 139 TH Members, "*Good afternoon all, Please see attachment documents in connection with 139th Avenue S.W. 8th Street LLC. Please sign and return a copy via-email [sic]. Best, Nelson Slosbergas.*" At all relevant times, criminals Slosbergas, [Marco E. Rojas](#) ("Rojas") (Florida Bar No. 940.453), and other Perpetrators, know they are committing crimes furthering schemes extorting Tavares. The Record shows the same CCE uses same *Modus Operandi*<sup>25</sup> on 139 TH to extort victim Tavares as in the other Eight (8 ) Related Cases.

<sup>22</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn's](#) ("Horn") Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and [portfolio tax-free bond frauds](#), tax frauds, and extortion, and providing, tax, bank, and securities' fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank's](#) ("BANIF") corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice in the United States of America.

<sup>23</sup> Slosbergas, and all Perpetrators know that, since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares' partner](#), West Eighth's principal Joao Tenorio, Tavares became 139 TH's 52% interest sole majority Member, and that, even assuming – *arguendo*, that Slosbergas, *et al.*, had the authority – which they did not have, 139 TH's bylaws required a proper call for a meeting allowing Members to participate. Because of Slosbergas' CCE evil powers, showing that they, *inter alia*, "*Own the keys to the courts in Miami,*" see Associate Peter F. Valori's statements to coerce Tavares in 2012, they systematically fabricate sham corporate resolutions to extort.

<sup>24</sup> Criminal [Slosbergas](#) is BRIDGELoAN's CCE [Consigliere](#), structuring sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States of America, and has already deprived and extorted, under color of law. U.S. citizen Tavares of more than \$50 million dollars in sham loans by BRIDGELoAN and longtime counterpart [The Bank of New York Mellon](#) ("BNY Mellon"), now is required under BRIDGELoAN's CCE's *Omertà Code*, to commit more brazen violations of law to further the CCE's schemes extorting Tavares and Tavares' 139 TH.

<sup>25</sup> The CCE uses same artifices extorting Tavares in Related Cases, see Record, *inter alia*, fabricating patently fraudulent indicia of membership interest and corporate resolutions, purportedly signed by bad actors in the Republic of Panamá without any authority over Tavares' companies, to further schemes depriving U.S. citizen Tavares, U.S. companies, the State of Florida, and the United States of America. See Tavares [Affidavit](#).

## COUNTS

**Count 56** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 57**- Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 58** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 59** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), at 1110 Brickell Avenue, Suite 310, Miami, FL 33131 ([nelson@miami-intl-law.com](mailto:nelson@miami-intl-law.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, use E-mail, to wit, with a certain correspondence containing the “First Sham Resolution of March 16, 2018, at 5:23 p.m., from Slosbergas to **(a)** Wolters Kluwer ([smallbusinesssteam@wolterskluwer.com](mailto:smallbusinesssteam@wolterskluwer.com))<sup>26</sup>; **(b)** Gabriela Maranhao Machado Guimaraes ([gabriela@g2investusa.com](mailto:gabriela@g2investusa.com)); **(c)** Francisco Alfonso Mesa Schuler ([fmesa888@aol.com](mailto:fmesa888@aol.com)); **(d)** Veronica Vergara ([veronicavergara@inversionesemmi.com](mailto:veronicavergara@inversionesemmi.com)); **(e)** Erick Schulz Magno ([emagno@magnolaw.com](mailto:emagno@magnolaw.com)); Charles Tavares ([ctavares@bellsouth.net](mailto:ctavares@bellsouth.net)); **(f)** Mario Augusto Martins Pereira ([marcelademeyer@gmail.com](mailto:marcelademeyer@gmail.com)); **(g)** Marco Emilio Rojas ([mrjas@rsmiami.com](mailto:mrjas@rsmiami.com)); **(h)** Paulo Leite ([pauloleiteconsultoria@gmail.com](mailto:pauloleiteconsultoria@gmail.com)); **(i)** Magali Nader Vieira ([magali@ruyvieira.com.br](mailto:magali@ruyvieira.com.br)); and, c.c. to **(j)** Hugo Barreto Del Priore ([hdlpriore@me.com](mailto:hdlpriore@me.com)); and **(k)** Jenny D. ([jenny@miami-intl-law.com](mailto:jenny@miami-intl-law.com)), for the purpose of executing and furthering schemes, in violation of Title 18 U.S.C. §1343.

<sup>26</sup> [Wolters Kluwer](#) (“Wolters Kluwer”) a.k.a. [CT Corporate Services](#), is a major enabler of the CCE’s schemes through the United States of America, and despite of Tavares’ complaints, supported by an abundance of hard evidence of the CCE’s crimes using Wolters Kluwer as an enabler to further schemes against U.S. citizens, U.S. companies, the State of Florida, and the United States of America, Wolters Kluwer, knowingly and intentionally continues to enable the CCE’s known criminal schemes.

**Count 60** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 61** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 62** - At all times relevant, shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

**Count 63** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
64	<b>March 21, 2018</b>	<b>U. S. CODE TITLE 18</b>	Nelson Slosbergas
65		§ 371 Conspiracy to Defraud the USA &	Nelson Slosbergas, P.A. NS Corporate Services, Inc.
66		§ 241 Conspiracy Against Rights &	Hugo Barreto Del Priore Ernesto Pereira Lopes
67		§ 1346 Scheme/Artifice to Defraud &	Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC
68		§ 1343 Wire Fraud &	Marco Emilio Rojas Nicholas Stanham
69		§ 1341 Mail Fraud &	Gabriela M. Machado Guimaraes <a href="#">Joseph Horn</a>
70		§ 1349 Conspiracy to Defraud &	Ralph Horn Ricardo Eichenwald
71		§ 1951 Extortion (Hobbs Act) &	Fernando Braghin Bridgeloan Investors, Inc.
72		§ 1961 <i>et seq.</i> – RICO &	The Continued Criminal Enterprise
		<b>FLORIDA STATUTES</b>	
		Title XLVI § 817.155 Fraudulent Practices	

On March 21, 2018, Bridgeloan Investors, Inc.'s Transnational Continued Criminal Enterprise's<sup>27</sup> ("CCE" or "Criminal Enterprise") Associate Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), using his bar license as guise to coerce and extort, transmits, Via U.S. Mail & E-mail, a **Sham Letter of March 21, 2018**, with a Second fabricated sham Statement of Written Consent of Charles Tavares' ("Tavares") 139TH Avenue SW 8 Street, LLC's ("139 TH") ("Second Sham Resolution of March 22, 2018"), to improperly and invalidly<sup>28</sup> remove Tavares as 139 TH's sole manager, president, director and registered agent. Slosbergas' sham letter falsely states, to further the scheme, that, *inter alia*, "To All Members: This letter shall serve to confirm that in an effort to give all the Members the opportunity to vote and consent to the removal of the current manager and president and the change of registered agent, it is hereby confirmed that the previous Statement of Written Consent [First Sham Resolution of March 16, 2018] shall be disregarded". At all relevant times, criminals Slosbergas, [Marco E. Rojas](#) ("Rojas") (Florida Bar No. 940.453), and other Perpetrators know they are committing crimes to further schemes extorting<sup>29</sup> Tavares & Tavares' 139 TH.

<sup>27</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn's](#) ("Horn") CCE, specialized in [intercontinental money laundering](#) billions, bank, mortgage, securities, and [portfolio tax-free bond frauds](#), tax frauds, and extortion, and providing, tax, bank, and securities' fraud through the United States to reckless domestic and international investors, together by [BANIF Bank's](#) ("BANIF") corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and [reckless real estate developers](#), jointly furthering schemes undermining the rule of law to prevent justice.

<sup>28</sup> Criminal Slosbergas, *et al.*, know that, since [August 2013](#), pursuant to an [agreed settlement between Tavares and Tavares' partner](#), West Eighth's principal Joao Tenorio ("Tenorio"), Tavares became 139 TH's 52% interest sole majority Member, and 139 TH's sole legal authority.

<sup>29</sup> The CCE uses same *Modus Operandi* as in Related Cases, extorting Tavares of properties and rights, *e.g.*, in the BRIDGELOAN Case, and in the BCP/Car Wash Case, showing the CCE's attorneys surrounding the unsuspecting victim and client in fatal conflicted representations to set up schemes entrapping the victim, then, systematically interfering with an advantageous business relationship, sabotaging deals, coercing Tavares' investors, extorting Tavares to sell cheap to the CCE, and because Tavares fights the extortion, the CCE causes Associates to hijack Tavares' Companies with sham fabricated, *inter alia*, corporate resolutions, Indicia of Membership Interest, and Power of Attorneys of Tavares' Companies, and often using Associates and bad actors in the Republic of Panamá, or simply fabricating forged copy/pasted sham signatures from individuals in the Republic of Panamá in fabricated sham resolutions to further schemes and money launder the ill-gotten proceeds upon subverted proceedings in the Eleventh Judicial Circuit in Miami-Dade County, Florida ("Miami Courts"), depriving U.S. citizen Tavares, U.S. companies, the State of Florida, and the United States of America. See Record for the Nine (9) Related Cases, and [Tavares' Affidavit](#).

## **COUNTS**

**Count 64** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 65**- Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 66** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 67** - Shameless criminal Nelson Slosbergas (“Slosbergas”) at ([nelson@miami-intl-law.com](mailto:nelson@miami-intl-law.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, use E-mail, to wit, transmit a certain [Sham Letter of March 21, 2018](#), with a Second Sham Resolution of March 22, 2018, from Slosbergas to **(a)** Wolters Kluwer ([smallbusinesssteam@wolterskluwer.com](mailto:smallbusinesssteam@wolterskluwer.com)); **(b)** Gabriela Maranhao Macahdo Guimaraes ([gabriela@g2investusa.com](mailto:gabriela@g2investusa.com)); **(c)** Francisco Schuler ([fmesa888@aol.com](mailto:fmesa888@aol.com)); **(d)** Veronica Vergara ([veronicavergara@inversionesemmi.com](mailto:veronicavergara@inversionesemmi.com)); **(e)** Erick Schulz Magno ([emagno@magnolaw.com](mailto:emagno@magnolaw.com)); Charles Tavares ([ctavares@bellsouth.net](mailto:ctavares@bellsouth.net)); **(f)** Mario Augusto Martins Pereira ([marcelademeyer@gmail.com](mailto:marcelademeyer@gmail.com)); **(g)** Marco Emilio Rojas ([mrjas@rsmiami.com](mailto:mrjas@rsmiami.com)); **(h)** Paulo Leite ([pauloleiteconsultoria@gmail.com](mailto:pauloleiteconsultoria@gmail.com)); **(i)** Magali Nader Vieira ([magali@ruyvieira.com.br](mailto:magali@ruyvieira.com.br)); and, c.c. to **(j)** Hugo Barreto Del Priore ([hdlpriore@me.com](mailto:hdlpriore@me.com)); and **(k)** Jenny D. ([jenny@miami-intl-law.com](mailto:jenny@miami-intl-law.com)), for the purpose of executing and furthering schemes, in violation of Title 18 U.S.C. §1343.

**Count 68** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), at 1110 Brickell Avenue, Suite 310, Miami, FL 33131, and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights



and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, use U.S. Postal Mail, to wit, transmit a certain [Sham Letter of March 21, 2018](#) with a Second Sham Resolution of March 22, 2018, from Slosbergas to, *inter alia*, **(a)** Charles Tavares, President, IBAC Assets Holders Inc., at 245 S.E. 1<sup>st</sup> Street, Suite, Miami, Florida 33131, for the purpose of furthering schemes, in violation of Title 18 U.S.C. §1341.

**Count 69** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 70** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 71** - At all times relevant, shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 72** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
73	<b>March 22, 2018</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Nelson Slosbergas Nelson Slosbergas, P.A. NS Corporate Services, Inc.
74		§ 241 Conspiracy Against Rights &	Hugo Barreto Del Priore Ernesto Pereira Lopes
75		§ 1346 Scheme/Artifice to Defraud &	Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC
76		§ 1349 Conspiracy to Defraud &	Marco Emilio Rojas Fernando Menendez Montes
77		§ 1951 Extortion (Hobbs Act) &	Gabriela M. Machado Guimaraes <a href="#">Joseph Horn</a>
78		§ 1961 <i>et seq.</i> – RICO &	Ralph Horn Ricardo Eichenwald
79		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Fernando Braghin Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On March 22, 2018, Bridgeloan Investors, Inc.'s Transnational Continued Criminal Enterprise's<sup>30</sup> ("CCE" or "Criminal Enterprise") Associate Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), using his bar license as guise to commit crimes, fabricates, with other Perpetrators, a false and invalid Statement of Written Consent of Charles Tavares' ("Tavares") 139TH Avenue SW 8 Street, LLC's ("139 TH") ("**Second Sham Resolution of March 22, 2018**"), improperly and invalidly<sup>31</sup> removing Tavares as 139 TH's sole manager, president, director, and registered agent ("**Second Sham Resolution March of 22, 2018**"). Slosbergas attaches to the Sham Resolution of March 22, 2018, fabricated and [forged signature pages](#) of Members West Eighth Corp. ("West Eighth"), Rumo Business LTD, a Cayman Islands company n.k.a. [Rumo Business Limited Corp., a Florida corporation](#) ("RUMO"), Pebblestone Worldwide, a British Virgin Islands company n.k.a. Pebblestone Worldwide Limited, Corp., a Florida corporation ("Pebblestone"), M4 Investments LTD, a Cayman Islands company ("M4"). At all relevant times, criminals Slosbergas, [Marco E. Rojas](#) ("Rojas") (Florida Bar No. 940.453), and other Perpetrators, know they are committing crimes to further schemes extorting Tavares. The Record shows the CCE using same *Modus Operandi*<sup>32</sup> to extort.

<sup>30</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn's](#) ("Horn") Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and [portfolio tax-free bond frauds](#), tax frauds, and extortion, and providing, tax, bank, and securities' fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank's](#) ("BANIF") corrupt executives and [attorneys that hijacked BANIF](#), [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>31</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares' partner](#), West Eighth's principal Joao Tenorio ("Tenorio"), Tavares became 139 TH's 52% interest sole majority Member, and 139 TH's sole legal authority.

<sup>32</sup> The CCE uses same *Modus Operandi* as in Related Cases, extorting Tavares of properties and rights, *e.g.*, in the BRIDGELOAN Case, and in the BCP/Car Wash Case, showing the CCE's attorneys surrounding the unsuspecting victim and client in fatal conflicted representations to set up schemes entrapping the victim, then, systematically interfering with an advantageous business relationship, sabotaging deals, coercing Tavares' investors, extorting Tavares to sell cheap to the CCE, and because Tavares fights the extortion, the CCE causes Associates to hijack Tavares' Companies with sham fabricated, *inter alia*, corporate resolutions, Indicia of Membership Interest, and Power of Attorneys of Tavares' Companies, and often using Associates and bad actors in the Republic of Panamá, *e.g.*, Fernando Menendez Montes (fake "Montes") (Panamanian ID. #8-354-306), and Mirna Almanza (fake "Almanza") to fraudulently sign papers, or simply fabricating forged copy/pasted sham signatures from individuals in the Republic of Panamá in fabricated sham resolutions to further schemes and money launder the ill-gotten proceeds upon subverted proceedings in the Eleventh Judicial Circuit in Miami-Dade County, Florida ("Miami Courts"), depriving U.S. citizen Tavares, U.S. companies, the State of Florida, and the United States of America. See Record for the Nine (9) Related Cases, and [Tavares' Affidavit](#).

## COUNTS

**Count 73** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 74-** Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 75** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 76** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 77** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 78** - At all times relevant, shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to

false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 79** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, fabricating and forging sham indicia of membership interest and corporate resolutions of U.S. citizen Charles Tavares (“Tavares”) to steal and extort Tavares and Tavares’ 139 TH of properties and rights, and systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, to further underlying criminal schemes upon subverted Miami Courts, further depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
80	<b>March 29, 2018</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Nelson Slosbergas Nelson Slosbergas, P.A. NS Corporate Services, Inc.
81		§ 241 Conspiracy Against Rights &	Hugo Barreto Del Priore Ernesto Pereira Lopes
82		§ 1346 Scheme/Artifice to Defraud &	Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC
83		§ 1343 Wire Fraud &	Marco Emilio Rojas Nicholas Stanham
84		§ 1349 Conspiracy to Defraud &	Gabriela M. Machado Guimaraes <a href="#">Joseph Horn</a>
85		§ 1951 Extortion (Hobbs Act) &	Ralph Horn Ricardo Eichenwald
86		§ 1961 <i>et seq.</i> – RICO &	Fernando Braghin Bridgeloan Investors, Inc.
87		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise

On March 29, 2018, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>33</sup> (“CCE” or “Criminal Enterprise”) Associate Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), using his bar license as guise to coerce and extort, [files with the Florida Secretary of State \(“SUNBIZ”\)](#), with unclean hands,<sup>34</sup> a false and invalid<sup>35</sup> Amended Annual Report of Charles Tavares (“Tavares”) 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) (“**1<sup>st</sup> Sham SUNBIZ Report**”), to hijack 139 TH, furthering a brazen scheme depriving and extorting Tavares and Tavares’ 139 TH of properties and rights, following years of repeated, *inter alia*, attempts by the CCE to extort Tavares to sell 139 TH’s Properties<sup>36</sup> (“Properties”) cheap. Criminal Slosbergas signs “*WEST EIGHTH CORP*” as Manager of 139 TH, and Slosbergas “NS CORPORATE SERVICIES [sic] INC.” as 139 TH’s Registered Agent. At all relevant times, criminal Slosbergas, *et al.*, know in truth and in fact that, *inter alia*, Tavares has a 52% sole majority interest of 139 TH, and that their sham authority is predicated on fabricated indicia of membership interest, showing the CCE’s same *Modus Operandi*<sup>37</sup> systematically extorting Tavares in Related Cases.

<sup>33</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>34</sup> Criminal [Slosbergas](#) is BRIDGELOAN’s CCE [Consigliere](#) and mastermind of sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, and already extorted, under color of law. U.S. citizen Tavares of more than \$50 million dollars in sham loans by BRIDGELOAN and longtime counterpart [The Bank of New York Mellon](#) (“BNY Mellon”), now is required under BRIDGELOAN’s CCE’s [Omertà Code](#), to commit more brazen violations of law to further the CCE’s 139 TH’s scheme depriving and extorting Tavares of properties and rights.

<sup>35</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 Th’s sole legal authority.

<sup>36</sup> Since at least 2014, the CCE tries to extort Tavares to sell 139 TH’s Properties – 29 acres of vacant land at 13900 SW 8 Street, Miami, FL, for cents on the dollar, see sham offers, the CCE’s [ODEBRECHT in 2014](#), and to Associate [AHS, LLC a.k.a. RESIA, LLC for \\$3 million on August 4, 2017](#).

<sup>37</sup> The CCE uses same artifices extorting Tavares in Related Cases, see Record, *inter alia*, fabricating patently fraudulent indicia of membership interest and corporate resolutions, purportedly signed by bad actors in the Republic of Panamá without any authority over Tavares’ companies, to further schemes depriving U.S. citizen Tavares, U.S. companies, the State of Florida, and the United States of America. See Tavares [Affidavit](#).

## **COUNTS**

**Count 80** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 81**- Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 82** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 83** - Shameless criminal Nelson Slosbergas (“Slosbergas”), at 1110 Brickell Avenue, Suite 310, Miami, FL 33131 ([nelson@miami-intl-law.com](mailto:nelson@miami-intl-law.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of honest services, files with the Florida’s Secretary of State’s website SUNBIZ, knowingly and intentionally, transmitting, on March 29, 2018, Via Electronic Wire to wit - a certain false and invalid Amended Annual Report of Charles Tavares 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) (“**1<sup>st</sup> Sham SUNBIZ Report**”), for the purpose of executing schemes, in violation of Title 18 U.S.C. §1343.

**Count 84** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 85** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of



Tavares' properties and rights and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 86** - At all times relevant, shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 87** – Shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares' 139 TH, producing sham corporate resolutions of 139 TH, and transmitting aforesaid sham documents to, *inter alia*, the Florida Secretary of State's website SUNBIZ, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
88	<b>April 3, 2018</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Nelson Slosbergas Nelson Slosbergas, P.A. NS Corporate Services, Inc.
89		§ 241 Conspiracy Against Rights &	Hugo Barreto Del Priore Ernesto Pereira Lopes
90		§ 1346 Scheme/Artifice to Defraud &	Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC
91		§ 1341 Mail Fraud &	Marco Emilio Rojas Nicholas Stanham
92		§ 1349 Conspiracy to Defraud &	Gabriela M. Machado Guimaraes <a href="#">Joseph Horn</a>
93		§ 1951 Extortion (Hobbs Act) &	Ralph Horn Ricardo Eichenwald
94		§ 1961 <i>et seq.</i> – RICO &	Fernando Braghin Bridgeloan Investors, Inc.
95		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise

On April 3, 2018, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>38</sup> (“CCE” or “Criminal Enterprise”) Associate Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), using his bar license as guise to coerce and extort, transmits, Via U.S. Mail, with unclean hands,<sup>39</sup> a [Sham Letter](#) falsely stating that, 139TH Avenue SW 8 Street, LLC’s (“139 TH”) majority members<sup>40</sup> *duly approved* resolutions, on March 22, 2018, falsely removing Charles Tavares (“Tavares”) as 139 TH’s sole manager, president, director, and registered agent (“[Second Sham Resolution March 22, 2018](#)”). Slosbergas attaches to the Second Sham Resolution March 22, 2018, [forged signature pages](#) of Members West Eighth Corp. (“West Eighth”), Rumo Business LTD, a Cayman Islands company n.k.a. [Rumo Business Limited Corp., a Florida corporation](#) (“RUMO”), Pebblestone Worldwide, a British Virgin Islands company n.k.a. Pebblestone Worldwide Limited, Corp., a Florida corporation (“Pebblestone”), M4 Investments LTD, a Cayman Islands company (“M4”). At all relevant times, criminals Slosbergas, [Marco E. Rojas](#) (Florida Bar No. 940.453), Hugo Barreto Del Priore, *et al.*, know that the Second Sham Resolution of March 22, 2018 is not proper or valid, and is an artifice to further ongoing and continuous schemes depriving and extorting Tavares and Tavares’ 139 TH of all properties and rights, and showing the CCE’s same *Modus Operandi*.<sup>41</sup>

<sup>38</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>39</sup> Criminal [Slosbergas](#) is BRIDGELoAN’s CCE [Consigliere](#) and mastermind of sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, and already extorted, under color of law. U.S. citizen Tavares of more than \$50 million dollars in sham loans by BRIDGELoAN and longtime counterpart [The Bank of New York Mellon](#) (“BNY Mellon”), now is required under BRIDGELoAN’s CCE’s **Omertà Code**, to commit more brazen violations of law to further the CCE’s 139 TH’s scheme depriving and extorting Tavares of properties and rights.

<sup>40</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 TH’s sole legal authority.

<sup>41</sup> The CCE uses same artifices extorting Tavares in Related Cases, see Record, *inter alia*, fabricating patently fraudulent indicia of membership interest and corporate resolutions, purportedly signed by bad actors in the Republic of Panamá without any authority over Tavares’ companies, to further schemes depriving U.S. citizen Tavares, U.S. companies, the State of Florida, and the United States of America. See Tavares [Affidavit](#).

## **COUNTS**

**Count 88** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 89**- Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 90** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 91** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), at 1110 Brickell Avenue, Suite 310, Miami, FL 33131, and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services upon courts of law, knowingly and intentionally, transmits, [Via U.S. Mail](#), to wit - a certain [Certified U.S. Postal Mail of April, 3, 2018](#), from Slosbergas to Tavares, at 245 SE 1<sup>st</sup> Street, Suite 221, Miami, Florida 33131, containing the [Second Sham Resolutions of March 22, 2018](#), for the purpose of executing schemes, in violation of Title 18 U.S.C. §1341.

**Count 92** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 93** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of

Tavares' properties and rights and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 94** - At all times relevant, shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

**Count 95** – Shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
96	April 6, 2018	<b>U. S. CODE TITLE 18</b>	Nelson Slosbergas
		§ 371 Conspiracy to Defraud the USA	Nelson Slosbergas, P.A.
		&	NS Corporate Services, Inc.
97		§ 241 Conspiracy Against Rights	Hugo Barreto Del Priore
		&	Ernesto Pereira Lopes
98		§ 1346 Scheme/Artifice to Defraud	Rubens Menin Teixeira de Souza
		&	AHS Development a.k.a. RESIA, LLC
99		§ 1343 Wire Fraud	Marco Emilio Rojas
		&	Nicholas Stanham
100		§ 1349 Conspiracy to Defraud	Gabriela M. Machado Guimaraes
	&	<a href="#">Joseph Horn</a>	
101	§ 1951 Extortion (Hobbs Act)	Ralph Horn	
	&	Ricardo Eichenwald	
102	§ 1961 <i>et seq.</i> – RICO	Fernando Braghin	
	&	Bridgeloan Investors, Inc.	
103		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise

On April 6, 2018, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>42</sup> (“CCE” or “Criminal Enterprise”) Associate Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), using his bar license as guise to coerce and extort, [files with the Florida Secretary of State \(“SUNBIZ”\)](#), with unclean hands,<sup>43</sup> a false and invalid<sup>44</sup> Amended Annual Report of Charles Tavares (“Tavares”) 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) (“**2<sup>nd</sup> Sham SUNBIZ Report**”), to hijack 139 TH, furthering a brazen scheme depriving and extorting Tavares and Tavares’ 139 TH of properties and rights, following years of repeated, *inter alia*, attempts by the CCE to extort Tavares to sell 139 TH’s Properties<sup>45</sup> (“Properties”) below market value. Criminal Slosbergas signs “*Nelson Slosbergas PA*” as 139 Th’s attorney, and “*Nelson Slosbergas*” as 139 TH’s Registered Agent. At all relevant times, shameless criminal Slosbergas, *et al.*, know in truth and in fact that, *inter alia*, Tavares has a 52% sole majority interest of 139 TH, and that their sham authority is predicated on fabricated indicia of membership interest, showing the CCE’s same *Modus Operandi*<sup>46</sup> systematically extorting Tavares in Related Cases.

<sup>42</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>43</sup> Criminal [Slosbergas](#) is BRIDGELOAN’s CCE [Consigliere](#) and mastermind of sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, and already extorted, under color of law. U.S. citizen Tavares of more than \$50 million dollars in sham loans by BRIDGELOAN and longtime counterpart [The Bank of New York Mellon](#) (“BNY Mellon”), now is required under BRIDGELOAN’s CCE’s [Omertà Code](#), to commit more brazen violations of law to further the CCE’s 139 TH’s scheme depriving and extorting Tavares of properties and rights.

<sup>44</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 Th’s sole legal authority.

<sup>45</sup> Since at least 2014, the CCE tries to extort Tavares to sell 139 TH’s Properties – 29 acres of vacant land at 13900 SW 8 Street, Miami, FL, for cents on the dollar, see sham offers, the CCE’s [ODEBRECHT in 2014](#), and to Associate [AHS, LLC a.k.a. RESIA, LLC for \\$3 million on August 4, 2017](#).

<sup>46</sup> The CCE uses same artifices extorting Tavares in Related Cases, see Record, *inter alia*, fabricating patently fraudulent indicia of membership interest and corporate resolutions, purportedly signed by bad actors in the Republic of Panamá without any authority over Tavares’ companies, to further schemes depriving U.S. citizen Tavares, U.S. companies, the State of Florida, and the United States of America. See Tavares [Affidavit](#).

## **COUNTS**

**Count 96** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 97**- Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 98** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 99** - Shameless criminal Nelson Slosbergas (“Slosbergas”), at 1110 Brickell Avenue, Suite 310, Miami, FL 33131 ([nelson@miami-intl-law.com](mailto:nelson@miami-intl-law.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of honest, files with the Florida’s Secretary of State’s website SUNBIZ, knowingly and intentionally, transmitting, on April 6, 2018, Via Electronic Wire to wit - a certain false and invalid Amended Annual Report of Charles Tavares 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) (“**2<sup>nd</sup> Sham SUNBIZ Report**”), to further criminal schemes, in violation of Title 18 U.S.C. §1343.

**Count 100** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 101** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of



Tavares' properties and rights and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 102** - At all times relevant, shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 103** – Shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares' 139 TH, producing sham corporate resolutions of 139 TH, and transmitting aforesaid sham documents to, *inter alia*, the Florida Secretary of State's website SUNBIZ, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
104	July 18, 2018	<b>U. S. CODE TITLE 18</b>	Nelson Slosbergas
		§ 371 Conspiracy to Defraud the USA	Nelson Slosbergas, P.A.
		&	NS Corporate Services, Inc.
105		§ 241 Conspiracy Against Rights	Hugo Barreto Del Priore
		&	Ernesto Pereira Lopes
106		§ 1346 Scheme/Artifice to Defraud	Rubens Menin Teixeira de Souza
		&	AHS Development a.k.a. RESIA, LLC
107		§ 1343 Wire Fraud	Marco Emilio Rojas
		&	Nicholas Stanham
108		§ 1349 Conspiracy to Defraud	Gabriela M. Machado Guimaraes
		&	<a href="#">Joseph Horn</a>
109	§ 1951 Extortion (Hobbs Act)	Ralph Horn	
	&	Ricardo Eichenwald	
110	§ 1961 <i>et seq.</i> – RICO	Fernando Braghin	
	&	Bridgeloan Investors, Inc.	
111		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise

On July 18, 2018, Bridgeloan Investors, Inc.'s Transnational Continued Criminal Enterprise's<sup>47</sup> ("CCE" or "Criminal Enterprise") Associate Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), using his bar license as guise to coerce and extort, [files with the Florida Secretary of State](#) ("[SUNBIZ](#)"), with unclean hands,<sup>48</sup> a false and invalid<sup>49</sup> Amended Annual Report of Charles Tavares ("Tavares") 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH") (Tax Id. #65-1202407) ("**3<sup>rd</sup> Sham SUNBIZ Report**"), to hijack 139 TH, furthering a brazen scheme depriving and extorting Tavares and Tavares' 139 TH of properties and rights, following years of repeated, *inter alia*, attempts by the CCE to extort Tavares to sell 139 TH's Properties<sup>50</sup> ("Properties") below market value. Criminal Slosbergas signs "*West Eighth Corp.*" as 139 Th's Manager, and "*Nelson Slosbergas*" as 139 TH's Registered Agent. At all relevant times, shameless criminal Slosbergas, *et al.*, know in truth and in fact that, *inter alia*, Tavares has a 52% sole majority interest of 139 TH, and that their sham authority is predicated on fabricated indicia of membership interest, showing the CCE's same *Modus Operandi*<sup>51</sup> systematically extorting Tavares in Related Cases.

<sup>47</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn's](#) ("Horn") Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities' fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank's](#) ("BANIF") corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>48</sup> Criminal [Slosbergas](#) is BRIDGELoAN's CCE [Consigliere](#) and mastermind of sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, and already extorted, under color of law. U.S. citizen Tavares of more than \$50 million dollars in sham loans by BRIDGELoAN and longtime counterpart [The Bank of New York Mellon](#) ("BNY Mellon"), now is required under BRIDGELoAN's CCE's [Omertà Code](#), to commit more brazen violations of law to further the CCE's 139 TH's scheme depriving and extorting Tavares of properties and rights.

<sup>49</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares' partner](#), West Eighth's principal Joao Tenorio ("Tenorio"), Tavares became 139 TH's 52% interest sole majority Member, and 139 Th's sole legal authority.

<sup>50</sup> Since at least 2014, the CCE tries to extort Tavares to sell 139 TH's Properties – 29 acres of vacant land at 13900 SW 8 Street, Miami, FL, for cents on the dollar, see sham offers, the CCE's [ODEBRECHT in 2014](#), and to Associate [AHS, LLC a.k.a. RESIA, LLC for \\$3 million on August 4, 2017](#).

<sup>51</sup> The CCE uses same artifices extorting Tavares in Related Cases, see Record, *inter alia*, fabricating patently fraudulent indicia of membership interest and corporate resolutions, purportedly signed by bad actors in the Republic of Panamá without any authority over Tavares' companies, to further schemes depriving U.S. citizen Tavares, U.S. companies, the State of Florida, and the United States of America. See Tavares [Affidavit](#).

## **COUNTS**

**Count 104** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 105**- Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 106** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 107** - Shameless criminal Nelson Slosbergas (“Slosbergas”), at 1110 Brickell Avenue, Suite 310, Miami, FL 33131 ([nelson@miami-intl-law.com](mailto:nelson@miami-intl-law.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of honest services, files with the Florida’s Secretary of State’s website SUNBIZ, knowingly and intentionally, transmitting, on July 18, 2018, Via Electronic Wire to wit - a certain false and invalid Amended Annual Report of Charles Tavares 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) (“**3<sup>rd</sup> Sham SUNBIZ Report**”), to further criminal schemes, in violation of Title 18 U.S.C. §1343.

**Count 108** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 109** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of

Tavares' properties and rights and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 110** - At all times relevant, shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 111** – Shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares' 139 TH, producing sham corporate resolutions of 139 TH, and transmitting aforesaid sham documents to, *inter alia*, the Florida Secretary of State's website SUNBIZ, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
112	<b>August 30, 2018</b>	<b>U. S. CODE TITLE 18</b>	Nelson Slosbergas
		§ 371 Conspiracy to Defraud the USA	Nelson Slosbergas, P.A.
		&	NS Corporate Services, Inc.
113		§ 241 Conspiracy Against Rights	Hugo Barreto Del Priore
		&	Ernesto Pereira Lopes
114		§ 1346 Scheme/Artifice to Defraud	Rubens Menin Teixeira de Souza
		&	AHS Development a.k.a. RESIA, LLC
115		§ 1343 Wire Fraud	Marco Emilio Rojas
		&	Nicholas Stanham
116	§ 1349 Conspiracy to Defraud	Gabriela M. Machado Guimaraes	
	&	<a href="#">Joseph Horn</a>	
117	§ 1951 Extortion (Hobbs Act)	Ralph Horn	
	&	Ricardo Eichenwald	
118	§ 1961 <i>et seq.</i> – RICO	Fernando Braghin	
	&	Bridgeloan Investors, Inc.	
119		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise

On August 30, 2018, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>52</sup> (“CCE” or “Criminal Enterprise”) Associate Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), using his bar license as guise to coerce and extort, [files with the Florida Secretary of State \(“SUNBIZ”\)](#), with unclean hands,<sup>53</sup> a false and invalid<sup>54</sup> Amended Annual Report of Charles Tavares (“Tavares”) 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) (“**4<sup>th</sup> Sham SUNBIZ Report**”), to hijack 139 TH, furthering a brazen scheme depriving and extorting Tavares and Tavares’ 139 TH of properties and rights, following years of repeated, *inter alia*, attempts by the CCE to extort Tavares to sell 139 TH’s Properties<sup>55</sup> (“Properties”) cheap. Criminal Slosbergas signs “*West Eighth Corp.*” as 139 Th’s Manager, and “*Nelson Slosbergas*” as 139 TH’s Registered Agent. At all relevant times, shameless criminal Slosbergas, *et al.*, know in truth and in fact that, *inter alia*, Tavares has a 52% sole majority interest of 139 TH, and that their sham authority is predicated on fabricated indicia of membership interest, showing the CCE’s same *Modus Operandi*<sup>56</sup> systematically extorting Tavares in Related Cases.

<sup>52</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>53</sup> Criminal [Slosbergas](#) is BRIDGELoAN’s CCE [Consigliere](#) and mastermind of sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, and already extorted, under color of law. U.S. citizen Tavares of more than \$50 million dollars in sham loans by BRIDGELoAN and longtime counterpart [The Bank of New York Mellon](#) (“BNY Mellon”), now is required under BRIDGELoAN’s CCE’s [Omertà Code](#), to commit more brazen violations of law to further the CCE’s 139 TH’s scheme depriving and extorting Tavares of properties and rights.

<sup>54</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 Th’s sole legal authority.

<sup>55</sup> Since at least 2014, the CCE tries to extort Tavares to sell 139 TH’s Properties – 29 acres of vacant land at 13900 SW 8 Street, Miami, FL, for cents on the dollar, see sham offers, the CCE’s [ODEBRECHT in 2014](#), and to Associate [AHS, LLC a.k.a. RESIA, LLC for \\$3 million on August 4, 2017](#).

<sup>56</sup> The CCE uses same artifices extorting Tavares in Related Cases, see Record, *inter alia*, fabricating patently fraudulent indicia of membership interest and corporate resolutions, purportedly signed by bad actors in the Republic of Panamá without any authority over Tavares’ companies, to further schemes depriving U.S. citizen Tavares, U.S. companies, the State of Florida, and the United States of America. See Tavares [Affidavit](#).

## **COUNTS**

**Count 112** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 113**- Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 114** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 115** - Shameless criminal Nelson Slosbergas (“Slosbergas”), at 1110 Brickell Avenue, Suite 310, Miami, FL 33131 ([nelson@miami-intl-law.com](mailto:nelson@miami-intl-law.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of honest services, files with the Florida’s Secretary of State’s website SUNBIZ, knowingly and intentionally, transmitting, on August 30, 2018, Via Electronic Wire to wit - a certain false and invalid Amended Annual Report of Charles Tavares 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) (“**4<sup>th</sup> Sham SUNBIZ Report**”), to further criminal schemes, in violation of Title 18 U.S.C. §1343.

**Count 116** – Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 117** - Shameless criminal Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of

Tavares' properties and rights and selling and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 118** - At all times relevant, shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

**Count 119** – Shameless criminal Nelson Slosbergas ("Slosbergas") (Florida Bar No. 378.887), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares' 139 TH, producing sham corporate resolutions of 139 TH, and transmitting aforesaid sham documents to, *inter alia*, the Florida Secretary of State's website SUNBIZ, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).



**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
120	<b>August 30, 2018</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Peter Francis Valori Amanda Lara Fernandez Russell Marc Landy
121		§ 241 Conspiracy Against Rights &	Damian & Valori, LLP Marco Emilio Rojas
122		§ 242 Deprivation of Rights Under Color of Law &	Nelson Slosbergas Hugo Barreto Del Priore
123		§ 1343 Wire Fraud &	Ernesto Pereira Lopes Rubens Menin Teixeira de Souza
124		§ 1349 Conspiracy to Defraud &	AHS Development a.k.a. RESIA, LLC Gabriela M. Machado Guimaraes
125		§ 1951 Extortion (Hobbs Act) &	<a href="#">Joseph Horn</a> Ralph Horn
126		§ 1961 <i>et seq.</i> – RICO &	Ricardo Eichenwald Fernando Braghin
127		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On August 30, 2018, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>57</sup> (“CCE” or “Criminal Enterprise”) Associates Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), continuing using their bar license as guise to extort U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, improperly files,<sup>58</sup> with unclean hands,<sup>59</sup> a [sham lawsuit](#), using Tavares’ company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407), after hijacking 139 TH with sham authority fabricated by Slosbergas, *et al.* See *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“**139 TH Sham Case**”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”). The 139 TH Sham Case follows years of, *inter alia*, attempts by the CCE to extort Tavares to sell 139 TH’s Properties (“Properties”), valued over \$15 million for \$3 million. At all relevant times, criminal Slosbergas, *et al.*, know, in truth and in fact that, *inter alia*, Tavares has a 52% sole majority interest of 139 TH, and that their sham authority is predicated on fabricated indicia of membership interest, showing the CCE’s same *Modus Operandi*<sup>60</sup> systematically extorting Tavares in Related Cases upon subverted Miami Courts.

<sup>57</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>58</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 TH’s sole legal authority.

<sup>59</sup> Criminals [Slosbergas](#) and Rojas are longtime Associates of BRIDGELoAN’s CCE, continuously perpetrating sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, and having already extorted Tavares of more than \$50 million dollars in sham loans, in a conflicted representation to extort victim and client Tavares, by BRIDGELoAN and counterpart [The Bank of New York Mellon](#) (“BNY Mellon”), showing a clear continuous pattern of racketeering activity defrauding U.S. citizens, the State of Florida, and the United States.

<sup>60</sup> The CCE uses same artifices extorting Tavares in Related Cases, see Record, *inter alia*, fabricating patently fraudulent indicia of membership interest and corporate resolutions, purportedly signed by bad actors in the Republic of Panamá without any authority over Tavares’ companies, to further schemes depriving U.S. citizen Tavares, U.S. companies, the State of Florida, and the United States of America. See Tavares [Affidavit](#).

## COUNTS

**Count 120** - Shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 121**- Shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 122** - Shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”), in sham proceedings upon subverted Miami Courts, of Tavares’ properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 123** - Shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516) ([pvalori@dvllp.com](mailto:pvalori@dvllp.com)), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931)([afernandez@dvllp.com](mailto:afernandez@dvllp.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on August 30, 2018, [Via Electronic Wire](#), to wit - a certain [Sham Complaint](#) styled *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“**Sham 139 TH Case**”), see E-Filing #77268631, to further criminal schemes, in violation of Title 18 U.S.C. §1343.

**Count 124** – Shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and

extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 125** - Shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 126** - At all times relevant, shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 127** – Shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
128	<b>August 30, 2018</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Peter Francis Valori Amanda Lara Fernandez Russell Marc Landy
129		§ 241 Conspiracy Against Rights &	Damian & Valori, LLP Marco Emilio Rojas
130		§ 242 Deprivation of Rights Under Color of Law &	Nelson Slosbergas Hugo Barreto Del Priore
131		§ 1343 Wire Fraud &	Ernesto Pereira Lopes Rubens Menin Teixeira de Souza
132		§ 1349 Conspiracy to Defraud &	AHS Development a.k.a. RESIA, LLC Gabriela M. Machado Guimaraes
133		§ 1951 Extortion (Hobbs Act) &	<a href="#">Joseph Horn</a> Ralph Horn
134		§ 1961 <i>et seq.</i> – RICO &	Ricardo Eichenwald Fernando Braghin
135		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On August 30, 2018, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>61</sup> (“CCE” or “Criminal Enterprise”) Associates Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), continuing using their bar license as guise to extort U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, improperly files,<sup>62</sup> with unclean hands,<sup>63</sup> a [sham Plaintiff’s Verified Urgent Motion for Temporary Injunction](#) (“**Sham Motion for Injunction**”), by criminal Rojas signing as Vice-President of 139 TH, in the styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), to falsely remove Tavares from Tavares’ company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407), after hijacking 139 TH with sham authority fabricated by Slosbergas, *et al.* The 139 TH Sham Case follows years of, *inter alia*, attempts by the CCE to extort Tavares to sell 139 TH’s Properties (“Properties”), valued over \$15 million for \$3 million. At all relevant times, criminals Rojas, Peter, Fernandez, Slosbergas, *et al.*, know, in truth and in fact that, *inter alia*, Tavares has a 52% sole majority interest of 139 TH, and that their sham authority is predicated on fabricated indicia of membership interest, showing the CCE’s same *Modus Operandi* systematically extorting Tavares in Related Cases upon subverted Miami Courts.

<sup>61</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>62</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 TH’s sole legal authority.

<sup>63</sup> Criminals [Slosbergas](#) and Rojas are longtime Associates of BRIDGELoAN’s CCE, continuously perpetrating sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, and having already extorted Tavares of more than \$50 million dollars in sham loans, in a conflicted representation to extort victim and client Tavares, by BRIDGELoAN and counterpart [The Bank of New York Mellon](#) (“BNY Mellon”), showing a clear continuous pattern of racketeering activity defrauding U.S. citizens, the State of Florida, and the United States.

## COUNTS

**Count 128** - Shameless criminals Marco E. Rojas (“Rojas”), Nelson Slosbergas (“Slosbergas”), Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 129**- Shameless criminals Marco E. Rojas (“Rojas”), Nelson Slosbergas (“Slosbergas”), Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”) and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 130** - Shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”), in sham proceedings upon subverted Miami Courts, of Tavares’ properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 131** - Shameless criminals Peter F. Valori (“Peter”) ([pvalori@dvlip.com](mailto:pvalori@dvlip.com)), and Amanda Lara Fernandez (“Fernandez”) ([afernandez@dvlip.com](mailto:afernandez@dvlip.com)), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”) and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on August 30, 2018, [Via Electronic Wire](#), to wit - a certain [Sham Plaintiff’s Verified Urgent Motion for Temporary Injunction](#) (“**Sham Motion for Injunction**”) in the styled case *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), see E-Filing #77268631, to further criminal schemes, in violation of Title 18 U.S.C. §1343.

**Count 132** – Shameless criminals Marco E. Rojas (“Rojas”), Nelson Slosbergas (“Slosbergas”), Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”) and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to



further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 133** - Shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 134** - At all times relevant, shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 135** – Shameless criminals Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

136	<b>October 4, 2018</b>	<b><u>U. S. CODE TITLE 18</u></b> § 371 Conspiracy to Defraud the USA &	Peter Francis Valori Amanda Lara Fernandez Russell Marc Landy
137		§ 241 Conspiracy Against Rights &	Damian & Valori, LLP Marco Emilio Rojas
138		§ 242 Deprivation of Rights Under Color of Law &	Nelson Slosbergas Hugo Barreto Del Priore
139		§ 1343 Wire Fraud &	Ernesto Pereira Lopes Rubens Menin Teixeira de Souza
140		§ 1349 Conspiracy to Defraud &	AHS Development a.k.a. RESIA, LLC Gabriela M. Machado Guimaraes
141		§ 1951 Extortion (Hobbs Act) &	<a href="#">Joseph Horn</a> Ralph Horn
142		§ 1961 <i>et seq.</i> – RICO &	Ricardo Eichenwald Fernando Braghin
143		<b><u>FLORIDA STATUTES</u></b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On October 4, 2018, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>64</sup> (“CCE” or “Criminal Enterprise”) Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), continuing using their bar license as guise to extort U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, improperly files,<sup>65</sup> with unclean hands,<sup>66</sup> a sham [Notice of Evidentiary Hearing](#) (“**Sham Notice Hearing**”) on Plaintiff’s Verified Urgent Motion for Temporary Injunction (“Sham Motion for Injunction”), in the styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), to falsely remove Tavares from Tavares’ company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407), after hijacking 139 TH with sham authority fabricated by Slosbergas, *et al.* The 139 TH Sham Case follows years of, *inter alia*, attempts by the CCE to extort Tavares to sell 139 TH’s Properties (“Properties”), valued over \$15 million for \$3 million. At all relevant times, criminals Peter, Fernandez, Marco E. Rojas (“Rojas”) (Florida bar No. 940.453), Nelson Slosbergas (“Slosbergas”) (Florida Bar No. 378.887), *et al.*, know, in truth and in fact that, *inter alia*, Tavares has a 52% sole majority interest of 139 TH, and that their sham authority is predicated on fabricated indicia of membership interest, showing the CCE’s same *Modus Operandi*<sup>67</sup> systematically extorting Tavares in Related Cases upon subverted Miami Courts.

<sup>64</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked BANIF](#), [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), furthering schemes.

<sup>65</sup> Criminals Peter and Fernandez, knowingly and intentionally, notice the sham Evidentiary Hearing for a date they know Tavares is not able to attend, depriving Tavares of rights to further the scheme, and contrary to court’s rules. See [Presiding Judge Bronwyn C. Miller’s court’s rules](#).

<sup>66</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 Th’s sole legal authority.

<sup>67</sup> Criminals [Slosbergas](#) and Rojas are longtime Associates of BRIDGELoAN’s CCE, continuously perpetrating sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, and having already extorted Tavares of more than \$50 million dollars in sham loans, in a conflicted representation to extort victim and client Tavares, by BRIDGELoAN and counterpart [The Bank of New York Mellon](#) (“BNY Mellon”), showing a clear continuous pattern of racketeering activity defrauding U.S. citizens, the State of Florida, and the United States.



## COUNTS

**Count 136** - Shameless criminals Peter F. Valori ("Peter") (Florida Bar No. 43.516), and Amanda Lara Fernandez ("Fernandez") (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law ("Valori"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 137**- Shameless criminals Peter F. Valori ("Peter") (Florida Bar No. 43.516), and Amanda Lara Fernandez ("Fernandez") (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law ("Valori"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 138** - Shameless criminals Peter F. Valori ("Peter") (Florida Bar No. 43.516), and Amanda Lara Fernandez ("Fernandez") (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law ("Valori"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares ("Tavares"), in sham proceedings upon subverted Miami Courts, of Tavares' properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 139** - Shameless criminals Peter F. Valori ("Peter") (Florida Bar No. 43.516) ([pvalori@dvllp.com](mailto:pvalori@dvllp.com)), Amanda Lara Fernandez ("Fernandez") (Florida Bar No. 106.931)([afernandez@dvllp.com](mailto:afernandez@dvllp.com)), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law ("Valori") ([spitta@dvllp.com](mailto:spitta@dvllp.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares ("Tavares") and Tavares' company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH") of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on October 4, 2018, Via Electronic Wire, to wit - a certain Sham Notice of Hearing for October 15, 2018 ("Sham Notice Hearing") on Plaintiff's Verified Urgent Motion for Temporary Injunction ("**Sham Motion for Injunction**") in the styled case *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 ("Sham 139 TH Case"), see E-Filing #78876348, to further criminal schemes, in violation of Title 18 U.S.C. §1343.

**Count 140** – Shameless criminals Peter F. Valori ("Peter") (Florida Bar No. 43.516), Amanda Lara Fernandez ("Fernandez") (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law ("Valori"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further

the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 141** - Shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 142** - At all times relevant, Shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 143** – Shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT    APROX. DATE                                VIOLATIONS    PERPETRATORS**

144	<b>October 15, 2018</b>	<b>U. S. CODE TITLE 18</b>	Bronwyn C. Miller Miami Courts Peter Francis Valori Amanda Lara Fernandez Russell Marc Landy Damian & Valori, LLP The Continued Criminal Enterprise
		§ 371 Conspiracy to Defraud the USA	
145		&	
		§ 241 Conspiracy Against Rights	
146		&	
		§ 242 Deprivation of Rights Under Color of Law	
147		&	
		§ 1349 Conspiracy to Defraud	
148		&	
		§ 1961 <i>et seq.</i> – RICO	
149	<b>FLORIDA STATUTES</b>		
	Title XLVI § 817.155 Fraudulent Practices		
150	<b>FLORIDA CODE OF JUDICIAL CONDUCT</b>		
	Violations of Canons 1, 2, and 3		

On October 15, 2018, Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), in reckless disregard for, *inter alia*, [Judge Miller’s own court’s rules](#), due process of law, Tavares’ rights, and the record displayed showing a scheme depriving U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, in subverted proceedings in the sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No.2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), knowingly and intentionally, presides a **Kangaroo Court**, staging a sham Evidentiary Hearing on [Plaintiff’s Verified Motion for Temporary Injunction](#), willfully set by Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP (“Valori”), and Judge Miller,<sup>68</sup> in a date and time they all know Tavares is out of the country and could not attend.<sup>69</sup> The record displayed shows Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>70</sup> (“CCE” or “Criminal Enterprise”) ongoing brazen schemes to extort Tavares of all properties and rights, to further silence Tavares from exposing the CCE’s schemes upon subverted Florida Courts.<sup>71</sup> At all relevant times, reckless Judge Miller and the CCE’s Associates know, in truth and in fact, that they are willfully depriving Tavares of rights, and further depriving the State of Florida and the United States of America of honest services upon courts of law.

<sup>68</sup> [Judge Miller](#), like most corrupted Judges on Tavares’ Related Cases, see, *e.g.*, corrupt Judges Allan Lester Langer, Joseph I. Davis Jr., Alan S. Fine, Carlos Manuel Guzman, and Norma Shepard Lindsey, are appointed by then Governor Rick Scott, [who knowingly fails to enforce the law](#).

<sup>69</sup> Criminals Valori, knowingly and intentionally, notice the sham Evidentiary Hearing for a date they know Tavares is not able to attend, depriving Tavares of rights to further the scheme, and contrary to court’s rules. See [Presiding Judge Bronwyn C. Miller’s court’s rules](#). For Judge Miller’s reckless disregard for the law and the constitution, furthering schemes upon courts, she is appointed to be a Third DCA Judge by Gov. Rick Scott.

<sup>70</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked BANIF](#), [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), furthering schemes.

<sup>71</sup> BRIDGELoAN’s CCE, and its counterparts, are continuously perpetrating sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, systematic extortion of U.S. citizens and companies, and having extorted Tavares of + \$86 million dollars in subverted Florida courts, further depriving the State of Florida and the United States of honest services upon courts of law. The sophisticated scheme corrupting and subverting the, *inter alia*, judicial, political, and financial systems in the Unites States, is funded, *e.g.*, through the CCE’s offshore banks, and its **“Shadow Exchange-Market,”** covertly paying bribes with interests in LLCs’ holding the CCE’s assets. See [Tavares Affidavit](#).

## COUNTS

**Count 144** - Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States of America, in violation of Title 18 U.S.C. §371.

**Count 145**- Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, right to uncorrupted courts of law, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 146** - Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), Miam Courts, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally, systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”) in sham proceedings, and willfully deprive Tavares of properties and rights by entering a Sham Injunction, upon subverted Miami Courts, depriving Tavares of rights and properties, in violation of, 18 U.S.C. §242.

**Count 147** – Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 148** - At all times relevant, reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits,

influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

**Count 149** – Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices to deprive Tavares of rights and properties upon sham proceedings, further, knowingly and intentionally subverting Florida courts to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**Count 150** – Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), the Miami Courts, and other officers of the court implicated, did knowingly and intentionally, improperly use their judicial powers as guise to commit crimes, willfully participating in a brazen known criminal scheme, by, *inter alia*, presiding a **Kangaroo Court**, to, knowingly and intentionally deprive and extort U.S. citizen Charles Tavares’ (“Tavares”) in a Sham Evidentiary Hearing of October 15, 2018, to knowingly and intentionally further the systematic subversion of Florida Courts by, among others, BRIDGELoan’s CCE’S Associates, systematically depriving, extorting Tavares of all properties, and violating, under color of law, Tavares’ constitutionally guaranteed rights and due process of law, further depriving the State of Florida, and the United States of America, of honest services upon courts of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

**COUNT   APROX. DATE                      VIOLATIONS                                      PERPETRATORS**

151	<b>October 15, 2018</b>	<b>U. S. CODE TITLE 18</b>	Bronwyn C. Miller Miami Courts The Continued Criminal Enterprise
152		§ 371 Conspiracy to Defraud the USA &	
153		§ 241 Conspiracy Against Rights &	
154		§ 242 Deprivation of Rights Under Color of Law &	
155		§ 1349 Conspiracy to Defraud &	
156		§ 1961 <i>et seq.</i> – RICO &	
157		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices & <b>FLORIDA CODE OF JUDICIAL CONDUCT</b> Violations of Canons 1, 2, and 3	

On October 15, 2018, Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), in reckless disregard for, *inter alia*, [Judge Miller’s own court’s rules](#), due process of law, Tavares’ rights, and the record displayed showing a scheme depriving U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, in subverted proceedings in the sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No.2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), knowingly and intentionally, presides a **Kangaroo Court**, staging a sham Evidentiary Hearing on [Plaintiff’s Verified Motion for Temporary Injunction](#), willfully set by Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP (“Valori”), and Judge Miller,<sup>72</sup> in a date they all know Tavares is out of the country and could not attend,<sup>73</sup> knowingly and intentionally, granting Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s (“CCE” or “Criminal Enterprise”) Valori, Rojas, Slosbergas, *et al.’s* [Order on Plaintiff’s Motion for Temporary Injunction](#) (“**Sham Injunction**”), depriving and extorting Tavares of properties and rights, furthering the scheme to have the corrupted and subverted Miami Courts legalizing the illegal hijacking of Tavares’ 139 TH. The record displayed shows the CCE’s ongoing brazen schemes to extort Tavares of all properties and rights, to further silence Tavares from exposing the CCE’s schemes upon subverted Florida Courts.<sup>74</sup> At all relevant times, reckless Judge Miller knows, in truth and in fact, that she is depriving Tavares of properties and rights, under color of law, and depriving the State of Florida and the United States of America of honest services upon courts of law.

<sup>72</sup> [Judge Miller](#), like most corrupted Judges on Tavares’ Related Cases, see, *e.g.*, corrupt Judges Allan Lester Langer, Joseph I. Davis Jr., Alan S. Fine, Carlos Manuel Guzman, and Norma Shepard Lindsey (“Judge Lindsey”), are appointed by then Governor Rick Scott, [who knowingly fails to enforce the law](#). Like corrupt Judge Lindsey before, after showing her **Omertà Code** to the CCE, [Judge Miller is appointed to be a 3<sup>rd</sup> DCA Judge](#).

<sup>73</sup> Criminals Valori, knowingly and intentionally, notice the sham Evidentiary Hearing for a date they know Tavares is not able to attend, depriving Tavares of rights to further the scheme, and contrary to court’s rules. See [Presiding Judge Bronwyn C. Miller’s court’s rules](#). For Judge Miller’s reckless disregard for the law and the constitution, furthering schemes upon courts, she is nominated to be a Third DCA Judge by Gov. Rick Scott.

<sup>74</sup> BRIDGELoAN’s CCE, and its counterparts, are continuously perpetrating sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, systematic extortion of U.S. citizens and companies, and having extorted Tavares of + \$86 million dollars in subverted Florida courts, further depriving the State of Florida and the United States of honest services upon courts of law. The sophisticated scheme corrupting and subverting the, *inter alia*, judicial, political, and financial systems in the Unites States, is funded, *e.g.*, through the CCE’s offshore banks, and its “**Shadow Exchange-Market**,” covertly paying bribes with interests in LLCs’ holding the CCE’s assets. See [Tavares Affidavit](#).

## COUNTS

**Count 151** - Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), Miam Courts, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 152**- Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), Miam Courts, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, rights to uncorrupted courts of law, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 153** - Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), Miam Courts, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally, systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”) in sham proceedings, and willfully deprive Tavares of properties and rights by entering a Sham Injunction, upon subverted Miami Courts, depriving Tavares of rights and properties, in violation of, 18 U.S.C. §242.

**Count 154** – Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), Miam Courts, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 155** - At all times relevant, reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), Miam Courts, and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to, holding sham hearings extorting U.S. citizen Charles Tavares of properties and rights, and entering a Sham Injunction to deprive and extort, under color of law, Tavares of properties and rights, false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving



the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 156** – Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), shameless criminals Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP a.k.a. Damin | Valori | Culmo Law (“Valori”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices to deprive Tavares of rights and properties upon sham proceedings, further, knowingly and intentionally subverting Florida courts to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**Count 157** – Reckless Judge Bronwyn C. Miller (“Judge Miller”) (Florida Bar No. 119.441), the Miami Courts, and other officers of the court implicated, did knowingly and intentionally, improperly use their judicial powers as guise to commit crimes, willfully participating in a brazen known criminal scheme, by, *inter alia*, presiding a **Kangaroo Court**, to, knowingly and intentionally deprive and extort U.S. citizen Charles Tavares’ (“Tavares”) in a Sham Evidentiary Hearing of October 15, 2018, to knowingly and intentionally further the systematic subversion of Florida Courts by, among others, BRIDGELoan’S CCE’S Associates, systematically depriving, extorting Tavares of all properties, and violating, under color of law, Tavares’ constitutionally guaranteed rights and due process of law, further depriving the State of Florida, and the United States of America, of honest services upon courts of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
158	December 5, 2018	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Peter Francis Valori Adam Grant Schultz Amanda Lara Fernandez
159		§ 241 Conspiracy Against Rights &	Damian & Valori, LLP Marco Emilio Rojas
160		§ 242 Deprivation of Rights Under Color of Law &	Nelson Slosbergas Hugo Barreto Del Priore
161		§ 1343 Wire Fraud &	Ernesto Pereira Lopes Rubens Menin Teixeira de Souza
162		§ 1349 Conspiracy to Defraud &	AHS Development a.k.a. RESIA, LLC Gabriela M. Machado Guimaraes
163		§ 1951 Extortion (Hobbs Act) &	<a href="#">Joseph Horn</a> Ralph Horn
164		§ 1961 <i>et seq.</i> – RICO &	Ricardo Eichenwald Fernando Braghin
165		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On December 5, 2018, Bridgeloan Investors, Inc.'s Transnational Continued Criminal Enterprise's<sup>75</sup> ("CCE" or "Criminal Enterprise") Associates Peter F. Valori ("Peter") (Florida Bar No. 43.516), Adam Grant Schultz ("Schultz") (Florida Bar No. 121.111), and Amanda L. Fernandez ("Fernandez") (Florida Bar No. 106.931), Damian & Valori, LLP ("Valori"), and Marco E. Rojas ("Rojas") (Florida Bar No. 940.453), continuing using their bar licenses as guise to extort U.S. citizen Charles Tavares ("Tavares") of all properties and rights, under color of law, improperly files,<sup>76</sup> with unclean hands,<sup>77</sup> a sham [Plaintiff's Motion for Summary Judgment](#) ("**Sham Motion for Summary Judgment**"), in the styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 ("Sham 139 TH Case"), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL ("Miami Courts"), to falsely remove Tavares from Tavares' company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH") (Tax Id. #65-1202407), after hijacking 139 TH in an improper and invalid staged Evidentiary Hearing, producing a null and void Injunction, further predicated on fabricated indicia of membership interest of 139 TH. At all relevant times, criminals Peter, Rojas, *et al.*, know in truth and in fact that, *inter alia*, Tavares has a 52% sole majority interest of 139 TH, and that their sham authority is predicated on fabricated indicia of membership interest, after attempting to extort Tavares to sell 139 TH's Properties cheap, showing the CCE's same *Modus Operandi*, systematically depriving and extorting Tavares of properties and rights in Related Cases, upon subverted Miami Courts.

<sup>75</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn's](#) ("Horn") Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities' fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank's](#) ("BANIF") corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>76</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares' partner](#), West Eighth's principal Joao Tenorio ("Tenorio"), Tavares became 139 TH's 52% interest sole majority Member, and 139 Th's sole legal authority.

<sup>77</sup> Criminals [Slosbergas](#) and Rojas are longtime Associates of BRIDGELoAN's CCE, continuously perpetrating sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, and having already extorted Tavares of more than \$50 million dollars in sham loans, in a conflicted representation to extort victim and client Tavares, by BRIDGELoAN and counterpart [The Bank of New York Mellon](#) ("BNY Mellon"), showing a clear continuous pattern of racketeering activity defrauding U.S. citizens, the State of Florida, and the United States.

## COUNTS

**Count 158** - Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez") Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 159**- Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez") Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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, *inter alia*, the right to property, and rights to uncorrupted courts of law, rights to own properties in the United States of America, free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 160** - Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez") Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares ("Tavares"), in sham proceedings upon subverted Miami Courts, of Tavares' properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 161** - Shameless criminals Peter F. Valori ("Peter") ([pvalori@dvlip.com](mailto:pvalori@dvlip.com)), Adam Grant Schultz ("Schultz") ([aschultz@dvlip.com](mailto:aschultz@dvlip.com)), Amanda L. Fernandez ("Fernandez") ([afernandez@dvlip.com](mailto:afernandez@dvlip.com)), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori") ([spitta@dvlip.com](mailto:spitta@dvlip.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares ("Tavares") and Tavares' company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH") of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on December 5, 2018, Via [Electronic Wire](#), to wit - a certain [Sham Plaintiff's Motion for Summary Judgment](#) ("**Sham Motion for Summary Judgment**") in the sham styled-case *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 ("Sham 139 TH Case"), see E-Filing #81696666, and Via E-Mail, to Charles Tavares (i) [ctavares@bellsouth.net](mailto:ctavares@bellsouth.net) ; and (ii) [charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com), to further criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 162** – Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez") Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to

further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 163** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 164** - At all times relevant, shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 165** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

166	<b>January 16, 2019</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Peter Francis Valori Adam Grant Schultz Amanda Lara Fernandez
167		§ 241 Conspiracy Against Rights &	Damian & Valori, LLP Marco Emilio Rojas
168		§ 242 Deprivation of Rights Under Color of Law &	Nelson Slosbergas Hugo Barreto Del Priore
169		§ 1343 Wire Fraud &	Ernesto Pereira Lopes Rubens Menin Teixeira de Souza
170		§ 1349 Conspiracy to Defraud &	AHS Development a.k.a. RESIA, LLC Gabriela M. Machado Guimaraes
171		§ 1951 Extortion (Hobbs Act) &	<a href="#">Joseph Horn</a> Ralph Horn
172		§ 1961 <i>et seq.</i> – RICO &	Ricardo Eichenwald Fernando Braghin
173		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On January 16, 2019, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>78</sup> (“CCE” or “Criminal Enterprise”) Associates Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Adam Grant Schultz (“Schultz”) (Florida Bar No. 121.111), and Amanda L. Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP (“Valori”), and Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), continuing using their bar licenses as guise to extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, improperly files,<sup>79</sup> with unclean hands,<sup>80</sup> a [sham Notice for Non-Jury Trial](#) (“**Sham Notice of Trial**”), in the styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), to falsely remove Tavares from Tavares’ company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407), after hijacking 139 TH in an invalid staged Evidentiary Hearing, producing a null and void Injunction, further predicated on fabricated indicia of membership interest of 139 TH. At all relevant times, criminals Peter, Rojas, *et al.*, know, in truth and in fact that, *inter alia*, Tavares has a 52% sole majority<sup>81</sup> interest of 139 TH, and that their sham authority is predicated on fabricated indicia of membership interest to deprive and extort Tavares, under color of law, upon subverted Miami Courts.

<sup>78</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>79</sup> Peter, Schultz, Fernandez, and Damian & Valori, LLP (“Valori”), knowingly and intentionally, to further the scheme, under color of law, falsely states that, “*Please Take Notice that pursuant to Florida Rule of Civil Procedure 1.440, the above-styled cause is now at issue and ready to be set for trial*”, when they know, in truth and in fact, that there is, *inter alia*, before the court, a pending Motion for Summary Judgment, **showing the cause is not at issue pursuant to [Florida Rule of Civil Procedure 1.440\(a\)](#)**. See also Valori’s [Sham Cancellation of Hearing of April 22, 2019](#).

<sup>80</sup> Shameless criminals Peter, Fernandez, Rojas, Slosbergas, *et al.*, have continuously for years, perpetrated frauds and extortion of Tavares, under color of law, subverting the Miami Courts to further BRIDGELoAN’s CCE’s schemes extorting Tavares of +\$86 million dollars. See [Tavares Affidavit](#).

<sup>81</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 TH’s sole legal authority.

## COUNTS

**Count 166** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 167**- Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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, *inter alia*, the right to property, and rights to uncorrupted courts of law, rights to own properties in the United States of America, free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 168** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”), in sham proceedings upon subverted Miami Courts, of Tavares’ properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 169** - Shameless criminals Peter F. Valori (“Peter”) ([pvalori@dvlip.com](mailto:pvalori@dvlip.com)), Adam Grant Schultz (“Schultz”) ([aschultz@dvlip.com](mailto:aschultz@dvlip.com)), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”) ([spitta@dvlip.com](mailto:spitta@dvlip.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on January 16, 2019, Via [Electronic Wire](#), to wit - a certain [Sham Notice for Non-Jury Trial](#) (“**Sham Notice of Trial**”), in the sham styled-case *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), see E-Filing #83454056, and Via E-Mail, to Charles Tavares (i) [ctavares@bellsouth.net](mailto:ctavares@bellsouth.net) ; and (ii) [charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com), to further criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 170** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in



the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 171** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 172** - At all times relevant, shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 173** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).



**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

174	<b>January 24, 2019</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Carlos Manuel Guzman Miami Courts The Continued Criminal Enterprise
175		§ 241 Conspiracy Against Rights &	
176		§ 242 Deprivation of Rights Under Color of Law &	
177		§ 1349 Conspiracy to Defraud &	
178		§ 1343 Wire Fraud &	
179		§ 1961 <i>et seq.</i> – RICO &	
180		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices &	
181		<b>FLORIDA CODE OF JUDICIAL CONDUCT</b> Violations of Canons 1, 2, and 3	

On January 24, 2019, Judge [Carlos Manuel Guzman](#)<sup>82</sup> (“Judge Guzman”) (Florida Bar No. 115.990), in reckless disregard for, *inter alia*, [Florida Rule of Civil Procedure 1.440](#), due process of law, Tavares’ rights, and the record displayed showing a scheme depriving U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, in subverted proceedings in the sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No.2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), knowingly and intentionally, to further the scheme, enters an improper Order for Non-Jury Trial (“**Sham Order for Trial**”). The record displayed shows, *inter alia*, there are motions pending before the court, among others, [Plaintiff’s Motion for Summary Judgment](#). Reckless Judge Guzman, irreconcilably, against the law and rights, grants Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>83</sup> (“CCE” or “Criminal Enterprise”) Valori, Rojas, *et al.*’s, [Sham Notice of Non-Jury Trial](#) of January 16, 2019, to further the scheme depriving and extorting Tavares of properties and rights. At all relevant times, reckless Judge Guzman knows, *inter alia*, in truth and in fact, that, pursuant to Florida Rule of Civil Procedure 1.440(a) the styled-action is not ready to be set for trial, and knowingly and intentionally, showing intent to deprive Tavares of properties and rights, under color of law, entering, and transmitting, via E-mail across state lines, the Sham Order for Trial, further depriving the State of Florida and the United States of America of honest services upon courts of law, to willfully further known brazen criminal schemes by BRIDGELOAN’s Transnational CCE.

<sup>82</sup> BRIDGELOAN’s CCE causes corrupt Judge Guzman to preside the sham 139 TH Case after previous presiding corrupt Judge Bronwyn C. Miller (“Judge Miller”), knowingly and intentionally, staged a sham Evidentiary Hearing of October 15, 2018, in a date Judge Miller knew Tavares could not attend, to further enter a sham void Injunction removing Tavares, predicated on forged and fraudulent indicia of membership interest fabricated by CCE’s Associates Nelson Slosbergas (“Slosbergas”) (Florida Bar 378.887), Marco Emilio Rojas (“Rojas”) (Florida Bar No. 940.453), *et al.*, is rewarded for her criminal actions extorting Tavares under color of law, by being appointed to be a 3rd DCA of Florida Judge.

<sup>83</sup> BRIDGELOAN’s CCE, and its counterparts, are continuously perpetrating sophisticated bank, [mortgage](#), securities, tax-free bond, and tax fraud schemes through the United States, systematic extortion of U.S. citizens and companies, and having extorted Tavares of + \$86 million dollars in subverted Florida courts, further depriving the State of Florida and the United States of honest services upon courts of law. The sophisticated scheme corrupting and subverting the, *inter alia*, judicial, political, and financial systems in the Unites States, is funded, *e.g.*, through the CCE’s offshore banks, and its “**Shadow Exchange-Market**,” covertly paying bribes with interests in LLCs’ holding the CCE’s assets. See [Tavares Affidavit](#).

## **COUNTS**

**Count 174** - Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 175**- Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, rights to uncorrupted courts of law, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 176** - Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally, systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”) in sham proceedings, and willfully deprive Tavares of properties and rights by entering an Order for Trial, upon subverted Miami Courts, depriving Tavares of rights and properties, in violation of, 18 U.S.C. §242.

**Count 177** – Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 178** – Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), and Miami Courts, knowingly and intentionally conspiring together with BRIDGELoAN’s CCE to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, cause to be transmitted, Via Electronic Wire, across state lines, on January 24, 2019 at 2:36 p.m., to wit - a certain [Sham Notice for Trial](#), in the sham styled-case *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), see E-Filing #83852386, and Via E-Mail, to, *inter alia*, **(a)** Charles Tavares (i) [ctavares@bellsouth.net](mailto:ctavares@bellsouth.net) (ii) [charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com); **(b)** Maria Fernanda Vilela ([fernandavilela\\_advogada@hotmail.com](mailto:fernandavilela_advogada@hotmail.com)); **(c)** Mossack Fonseca & Co. (i) [geneva@mossfon.ch](mailto:geneva@mossfon.ch) (ii) [mf@mossfon.com](mailto:mf@mossfon.com) (iii) [clientrelations@mossfon.com](mailto:clientrelations@mossfon.com) ; **(d)** Hugo Barreto Del Priore ([hdelpriore@argonpart.com.br](mailto:hdelpriore@argonpart.com.br)); **(e)** Joao Evangelista da Costa Tenorio ([nader.silva@gmail.com](mailto:nader.silva@gmail.com)); **(f)** Amanda Lara Fernandez ([afernandez@dvllp.com](mailto:afernandez@dvllp.com)); **(g)** Nelson Slosbergas ([nelson@mimai-intl-law.com](mailto:nelson@mimai-intl-law.com)); and **(h)** Chief Judge Bertila Ana Soto ([bsoto@jud11.flcourts.org](mailto:bsoto@jud11.flcourts.org)), to further brazen criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 179** - At all times relevant, reckless Judge Carlos Manuel Guzman ("Judge Guzman") (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to, holding sham hearings extorting U.S. citizen Charles Tavares of properties and rights, and entering a Sham Injunction to deprive and extort, under color of law, Tavares of properties and rights, false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 180** – Reckless Judge Carlos Manuel Guzman ("Judge Guzman") (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices to deprive Tavares of rights and properties upon sham proceedings, further, knowingly and intentionally subverting Florida courts to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**Count 181** – Reckless Judge Carlos Manuel Guzman ("Judge Guzman") (Florida Bar No. 115.990), Miami Courts, and other officers of the court implicated, did knowingly and intentionally, improperly use their judicial powers as guise to commit crimes, willfully participating in a brazen known criminal scheme, by, *inter alia*, presiding a **Kangaroo Court**, to, knowingly and intentionally deprive and extort U.S. citizen Charles Tavares' ("Tavares") in sham proceedings, entering a sham Order for Trial to deprive and extort Tavares of properties and rights, knowingly and intentionally furthering the systematic subversion of Florida Courts by, among others, BRIDGELoan'S CCE'S Associates, systematically depriving, extorting Tavares of all properties, and violating, under color of law, Tavares' constitutionally guaranteed rights and due process of law, further depriving the State of Florida, and the United States of America, of honest services upon courts of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
182	April 1, 2019	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Carlos Manuel Guzman Miami Courts Peter Francis Valori Amanda Lara Fernandez Damian & Valori, LLP Lisa M. Sheib Mauricio Mendez Daughters Reporting, Inc. The Continued Criminal Enterprise
183		§ 241 Conspiracy Against Rights &	
184		§ 242 Deprivation of Rights Under Color of Law &	
185		§ 1349 Conspiracy to Defraud &	
186		§ 1961 <i>et seq.</i> – RICO &	
187		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices &	
188		<b>FLORIDA CODE OF JUDICIAL CONDUCT</b> Violations of Canons 1, 2, and 3	

On April 1, 2019, reckless Judge [Carlos Manuel Guzman](#) (“Judge Guzman”) (Florida Bar No. 115.990), after knowingly and intentionally entering a [Sham Notice of Non-Jury Trial on January 24, 2019](#), in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), contrary to, *inter alia*, [Florida Rule of Civil Procedure 1.440](#), due process of law, U.S. citizen Charles Tavares’ (“Tavares”) rights, and the record displayed showing that there are motions pending before the court, *e.g.*, a [Plaintiff’s Motion for Summary Judgment](#), presides a **Kangaroo Court**, staging a sham hearing on Tavares’ Motion to Continue Trial<sup>84</sup> improperly set for April 2019. The record displayed shows that Judge Guzman is totally corrupted<sup>85</sup> by Joseph Horn’s Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and its Associates.<sup>86</sup> At all relevant times, Judge Guzman and other Perpetrators know that they are extorting Tavares of properties and rights under color of law. Corrupt Judge Guzman, closes the sham hearing, not entering a ruling<sup>87</sup> on Tavares’ Motion to Continue the improperly set trial. Showing the evil powers of the CCE over the subverted Miami Courts, [as in other Related Cases](#), see [Tavares’ Affidavit](#), receives the [Hearing’s Transcript](#) (“Tr.”), noticing they are [fraudulently transcribed](#) to blur the record and deprive.

<sup>84</sup> [Tavares’ Motion to Continue Trial](#) was set for March 27, 2019, and Tavares arrives on March 27, 2019 for the set hearing, Tavares is simply informed by Judge Guzman’s assistant Deborah Sardina, that there will be no hearing, showing a pattern of violations of Tavares’ rights to extort.

<sup>85</sup> Corrupt Judge Guzman, during the sham hearing, knowingly and intentionally, makes repeated false statements to further the scheme, as Tavares shows that the case is not ready to be set for trial, for example, falsely stating, “*JUDGE GUZMAN: Well, there’s nothing pending before me,*” see *Tr.* at 10 ¶¶ 19 -20, contrary to truth, fact, and record displayed showing [Plaintiff’s Motion for Summary Judgment](#) before the court.

<sup>86</sup> Criminals Peter F. Valori (Florida Bar No. 43.516), and Amanda Lara Fernandez (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), knowingly and intentionally, make repeated false statements to further the scheme, for example, falsely stating, that, “*Mr. Tavares was removed as manager, and we filed the case to enforce the membership agreement and have a declaration of the same so that it can be sold – the property can be sold –*,” see *Tr.* at 10 ¶¶ 19 -23, when in truth and in fact, Valori knows that Tavares has a majority 52% interest on 139 TH, and Valori, *et al.*, are falsely representing Tavares’ 139 TH with fabricated evidence, hijacking 139 TH to sell cheap to the CCE’s Associate AHS Residential, LLC.

<sup>87</sup> Corrupt Judge Guzman, to willfully continue depriving Tavares of due process of law and rights, under color of law, states, relating to Tavares’ motion to continue trial, “*JUDGE GUZMAN: We’ll [BRIDGELOAN’s CCE] tell you my decision on the motion to continue. And if gets granted, then so be it. If it gets denied, what day it will get set,*” see *Tr.* at 20 ¶¶ 8 -11. **Judge Guzman never enters an Order granting or denying.** See *Tr.*

## COUNTS

**Count 182** - Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 183**- Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, rights to uncorrupted courts of law, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 184** - Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally, systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”) in sham proceedings, and willfully deprive Tavares of properties and rights by entering a Order for Trial, upon subverted Miami Courts, depriving Tavares of rights and properties, in violation of, 18 U.S.C. §242.

**Count 185** – Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 186** - At all times relevant, reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the

enterprise, and engaged in various related criminal activities, including but not limited to, holding sham hearings extorting U.S. citizen Charles Tavares of properties and rights, and entering a Sham Injunction to deprive and extort, under color of law, Tavares of properties and rights, false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 187** – Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices to deprive Tavares of rights and properties upon sham proceedings, further, knowingly and intentionally subverting Florida courts to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**Count 188** – Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, and other officers of the court implicated, did knowingly and intentionally, improperly use their judicial powers as guise to commit crimes, willfully participating in a brazen known criminal scheme, by, *inter alia*, presiding a **Kangaroo Court**, to, knowingly and intentionally deprive and extort U.S. citizen Charles Tavares’ (“Tavares”) in sham proceedings, entering a sham Order for Trial to deprive and extort Tavares of properties and rights, knowingly and intentionally furthering the systematic subversion of Florida Courts by, among others, BRIDGELoan’s CCE’S Associates, systematically depriving, extorting Tavares of all properties, and violating, under color of law, Tavares’ constitutionally guaranteed rights and due process of law, further depriving the State of Florida, and the United States of America, of honest services upon courts of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.



**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

189	<b>April 2, 2019</b>	<b>U. S. CODE TITLE 18</b>	Peter Francis Valori
		§ 371 Conspiracy to Defraud the USA	Adam Grant Schultz
190		&	Amanda Lara Fernandez
		§ 241 Conspiracy Against Rights	Damian & Valori, LLP
191		&	Marco Emilio Rojas
		§ 242 Deprivation of Rights Under Color of Law	Nelson Slosbergas
192		&	Hugo Barreto Del Priore
		§ 1343 Wire Fraud	Ernesto Pereira Lopes
193		&	Rubens Menin Teixeira de Souza
		§ 1349 Conspiracy to Defraud	AHS Development a.k.a. RESIA, LLC
194		&	Gabriela M. Machado Guimaraes
	§ 1951 Extortion (Hobbs Act)	<a href="#">Joseph Horn</a>	
195		&	Ralph Horn
	§ 1961 <i>et seq.</i> – RICO	Ricardo Eichenwald	
196		&	Fernando Braghin
	<b>FLORIDA STATUTES</b>	Bridgeloan Investors, Inc.	
	Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise	

On April 2, 2019, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>88</sup> (“CCE” or “Criminal Enterprise”) Associates Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Adam Grant Schultz (“Schultz”) (Florida Bar No. 121.111), Amanda L. Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP (“Valori”), and Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), continuing using their bar licenses as guise to extort U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, improperly files,<sup>89</sup> with unclean hands,<sup>90</sup> a Sham [Notice of appearance](#) on behalf of Third-Party Defendant Hugo Barreto Del Priore (“Del Priore”) (“**Valori Appear for Del Priore**”), in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo Barreto Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), to falsely remove Tavares from Tavares’ company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407), and steal all Properties and rights, after hijacking 139 TH in an invalid staged Evidentiary Hearing, producing a null and void Injunction, further predicated on fabricated indicia of membership interest of 139 TH. Now, the Record displayed shows shameless criminals at Valori appearing in the subverted proceedings to *defend* their co-conspirators in the same scheme extorting Tavares of properties and rights upon the subverted Miami Courts.

<sup>88</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), furthering schemes.

<sup>89</sup> Valori, *et al.*, know that, since [August 2013](#), Tavares, at all times, a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#) West Eighth’s principal Joao Tenorio, became 139 TH’s 52% interest sole majority Member and 139 Th’s sole legal authority. Valori’s representation of 139 TH is false and invalid, predicated on fabricated evidence and sham pleadings to hijack 139 TH under color of law.

<sup>90</sup> Shameless criminals Peter, Rojas, Slosbergas, *et al.*, Associates of BRIDGELOAN’s CCE, have continuously for years, perpetrated frauds and extortion of Tavares, under color of law, subverting the Miami Courts furthering schemes extorting Tavares of +\$86 million dollars, and fabricating sham lawsuits, *inter alia*, the BCP, the Sham Fraga I, and Fraga II Double-Jeopardy Sham Cases, see [Related Cases](#), and at all relevant times, are fraudulently representing 139 TH with fabricated evidence to hijack Tavares’ 139 TH and steal its Properties. See [Tavares Affidavit](#).



## **COUNTS**

**Count 189** - Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez"), Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 190**- Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez"), Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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, *inter alia*, the right to property, and rights to uncorrupted courts of law, rights to own properties in the United States of America, free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 191** - Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez"), Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares ("Tavares"), in sham proceedings upon subverted Miami Courts, of Tavares' properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 192** - Shameless criminals Peter F. Valori ("Peter") ([pvalori@dvlip.com](mailto:pvalori@dvlip.com)), Adam Grant Schultz ("Schultz") ([aschultz@dvlip.com](mailto:aschultz@dvlip.com)), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori") ([spitta@dvlip.com](mailto:spitta@dvlip.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares ("Tavares") and Tavares' company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH") of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on April 2, 2019, Via [Electronic Wire](#), to wit - a certain [Notice of Appearance on Behalf of Third-Party Defendant Hugo Barreto Del Priore](#) ("**Valori Appear for Del Priore**"), in the sham styled-case *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 ("Sham 139 TH Case"), see E-Filing #87355449, and Via E-Mail, to Charles Tavares (i) [ctavares@bellsouth.net](mailto:ctavares@bellsouth.net) ; and (ii) [charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com), to further criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 193** – Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez"), Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in

the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 194** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 195** - At all times relevant, shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 196** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
197	April 2, 2019	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Peter Francis Valori Adam Grant Schultz
198		§ 241 Conspiracy Against Rights &	Amanda Lara Fernandez Damian & Valori, LLP
199		§ 242 Deprivation of Rights Under Color of Law &	Marco Emilio Rojas Nelson Slosbergas
200		§ 1343 Wire Fraud &	Hugo Barreto Del Priore Ernesto Pereira Lopes
201		§ 1349 Conspiracy to Defraud &	Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC
202		§ 1951 Extortion (Hobbs Act) &	Gabriela M. Machado Guimaraes <a href="#">Joseph Horn</a>
203		§ 1961 <i>et seq.</i> – RICO &	Ralph Horn Ricardo Eichenwald
204		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Fernando Braghin Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On April 2, 2019, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>91</sup> (“CCE” or “Criminal Enterprise”) Associates Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Adam Grant Schultz (“Schultz”) (Florida Bar No. 121.111), Amanda L. Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP (“Valori”), and Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), continuing using their bar licenses as guise to extort U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, improperly files,<sup>92</sup> with unclean hands,<sup>93</sup> a Sham Motion to Respond Third-Party Complaint (“**Sham Motion Respond**”), on behalf of Third-Party Defendant Hugo Barreto Del Priore (“Del Priore”), in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo Barreto Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), to falsely remove Tavares from Tavares’ company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407), and steal Properties and rights, after hijacking 139 TH in an invalid staged Evidentiary Hearing, producing an invalid and void Injunction, further predicated on fabricated indicia of membership interest of 139 TH. The Record displayed shows shameless criminals Valori *defending* their co-conspirators in the same scheme extorting Tavares, under color of law, of properties and rights upon the subverted Miami Courts.

<sup>91</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>92</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 Th’s sole legal authority.

<sup>93</sup> Shameless criminals Peter, Rojas, Slosbergas, *et al.*, Associates of BRIDGELoAN’s CCE, have continuously for years, perpetrated frauds and extortion of Tavares, under color of law, subverting the Miami Courts furthering schemes extorting Tavares of +\$86 million dollars, and fabricating sham lawsuits, *inter alia*, the BCP, the Sham Fraga I, and Fraga II Double-Jeopardy Sham Cases, see [Related Cases](#), and at all relevant times, are fraudulently representing 139 TH with fabricated evidence to hijack Tavares’ 139 TH and steal its Properties. See [Tavares Affidavit](#).

## COUNTS

**Count 197** - Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez"), Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 198**- Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez"), Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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, *inter alia*, the right to property, and rights to uncorrupted courts of law, rights to own properties in the United States of America, free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 199** - Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez"), Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares ("Tavares"), in sham proceedings upon subverted Miami Courts, of Tavares' properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 200** - Shameless criminals Peter F. Valori ("Peter") ([pvalori@dvlip.com](mailto:pvalori@dvlip.com)), Adam Grant Schultz ("Schultz") ([aschultz@dvlip.com](mailto:aschultz@dvlip.com)), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori") ([spitta@dvlip.com](mailto:spitta@dvlip.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares ("Tavares") and Tavares' company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH") of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on April 2, 2019, Via [Electronic Wire](#), to wit - a certain [Motion to Extend Time to Respond to Third-Party Complaint](#) ("**Sham Motion to Respond**") on Behalf of Third-Party Defendant Hugo Del Priore, in the sham styled-case *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 ("Sham 139 TH Case"), see E-Filing #87355449, and Via E-Mail, to Charles Tavares (i) [ctavares@bellsouth.net](mailto:ctavares@bellsouth.net) ; and (ii) [charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com), to further criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 201** – Shameless criminals Peter F. Valori ("Peter"), Amanda Lara Fernandez ("Fernandez"), Adam Grant Schultz ("Schultz"), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law ("Valori"), Marco E. Rojas ("Rojas"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further

the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 202** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 203** - At all times relevant, shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 204** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

205	<b>April 2, 2019</b>	<b>U. S. CODE TITLE 18</b>	Ernesto Pereira Lopes Rubens Menin Teixeira de Souza AHS Residential a.k.a. RESIA, LLC Michael P. Bonner Law Officers of Michael P. Bonner Marco Emilio Rojas Nelson Slosbergas Hugo Barreto Del Priore Gabriela M. Machado Guimaraes <a href="#">Joseph Horn</a> Ralph Horn Ricardo Eichenwald Fernando Braghin Bridgeloan Investors, Inc. The Continued Criminal Enterprise
206		§ 371 Conspiracy to Defraud the USA &	
207		§ 241 Conspiracy Against Rights &	
208		§ 242 Deprivation of Rights Under Color of Law &	
209		§ 1343 Wire Fraud &	
210		§ 1349 Conspiracy to Defraud &	
211		§ 1951 Extortion (Hobbs Act) &	
211		§ 1961 <i>et seq.</i> – RICO &	
212		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	

On April 2, 2019, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>94</sup> (“CCE” or “Criminal Enterprise”) Associate AHS Development Group, LLC<sup>95</sup> a.k.a. AHS Residential, LLC a.k.a. RESIA, LLC (“AHS” or “RESIA”), files, through AHS’s attorney Michael P. Bonner (“Bonner”) (Florida Bar No. 827. 721), with unclean hands,<sup>96</sup> a sham Motion to Dismiss Third-Party Complaint (“**AHS Motion Dismiss**”), in the sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo Barreto Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”). AHS, *et al.*, know in truth and in fact that, they are conspiring jointly and together to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights. The Record shows a scheme extorting Tavares, by, *inter alia*, coercing Tavares to sell to AHS, Tavares’ 139TH Avenue SW 8 Street, LLC, a Florida L.L.C.’s (“139 TH”) Properties for cents on the dollar and hijacking 139 TH with invalid fabricated indicia of membership interest to further an underlying scheme depriving Tavares of all properties and rights upon subverted Miami Courts. To further the scheme, AHS and Bonner make false statements in writing<sup>97</sup> to deprive Tavares, under color of law, of properties and rights.

<sup>94</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), furthering schemes.

<sup>95</sup> AHS is a company owned and controlled by Ernesto Pereira Lopes (“Lopes”) and Rubens Menin Teixeira de Souza (“Rubens Menin”), [Associates of BRIDGELoAN’s CEE](#), together and jointly, furthering schemes to, *inter alia*, extort Tavares and Tavares’ 139 TH of Properties [since at least 2014](#).

<sup>96</sup> AHS, *et al.*, all know that, since [August 2013](#), Tavares, at all times, a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio, Tavares became 139 TH’s 52% interest sole majority Member, and 139 TH’s sole legal authority. Because Tavares did not accept to be extorted by [AHS’s sham offer of August 4, 2017](#), to buy Tavares’ 139 TH’s Properties valued +\$15 million dollars for \$3 million dollars, AHS and the CCE’s Associates hijack Tavares’ 139 TH with fabricated evidence, and sham court proceedings.

<sup>97</sup> Among other false statements, Bonner and AHS falsely state that, “*Tavares fails to provide a copy of the ‘offer’ or any other instrument to support his allegations against AHS*”, when in truth and in fact, the Record displayed shows Tavares’ [filed AHS’s Sham Offer](#) to defraud Tavares



## COUNTS

**Count 205** - Michael P. Bonner (“Bonner”), Ernesto Pereira Lopes (“Lopes”), Rubens Menin Teixeira de Souza (“Rubens Menin”), AHS Development Group, LLC a.k.a. AHS Residential, LLC a.k.a. RESIA, LLC (“AHS” or “RESIA”), and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 206**- Michael P. Bonner (“Bonner”), Ernesto Pereira Lopes (“Lopes”), Rubens Menin Teixeira de Souza (“Rubens Menin”), AHS Development Group, LLC a.k.a. AHS Residential, LLC a.k.a. RESIA, LLC (“AHS” or “RESIA”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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, *inter alia*, the right to property, and rights to uncorrupted courts of law, rights to own properties in the United States of America, free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 207** - Michael P. Bonner (“Bonner”), Ernesto Pereira Lopes (“Lopes”), Rubens Menin Teixeira de Souza (“Rubens Menin”), AHS Development Group, LLC a.k.a. AHS Residential, LLC a.k.a. RESIA, LLC (“AHS” or “RESIA”), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”), in sham proceedings upon subverted Miami Courts, of Tavares’ properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 208** - Michael P. Bonner (“Bonner”) ([service@boner-law.com](mailto:service@boner-law.com)), Ernesto Pereira Lopes (“Lopes”), Rubens Menin Teixeira de Souza (“Rubens Menin”), AHS Development Group, LLC a.k.a. AHS Residential, LLC a.k.a. RESIA, LLC (“AHS” or “RESIA”), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on April 2, 2019, [Via Electronic Wire](#), to wit - a certain [sham Motion to Dismiss Third-Party Complaint \(“AHS Motion to Dismiss”\)](#), on Behalf of Third-Party Defendant AHS Development Group, LLC, in the sham styled-case *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo Barreto Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), see E-Filing #87366583, to further criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 209** – Michael P. Bonner (“Bonner”), Ernesto Pereira Lopes (“Lopes”), Rubens Menin Teixeira de Souza (“Rubens Menin”), AHS Development Group, LLC a.k.a. AHS Residential, LLC a.k.a. RESIA, LLC (“AHS” or “RESIA”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to



further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 210** - Michael P. Bonner (“Bonner”), Ernesto Pereira Lopes (“Lopes”), Rubens Menin Teixeira de Souza (“Rubens Menin”), AHS Development Group, LLC a.k.a. AHS Residential, LLC a.k.a. RESIA, LLC (“AHS” or “RESIA”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 211** - At all times relevant, Michael P. Bonner (“Bonner”), Ernesto Pereira Lopes (“Lopes”), Rubens Menin Teixeira de Souza (“Rubens Menin”), AHS Development Group, LLC a.k.a. AHS Residential, LLC a.k.a. RESIA, LLC (“AHS” or “RESIA”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 212** – Michael P. Bonner (“Bonner”), Ernesto Pereira Lopes (“Lopes”), Rubens Menin Teixeira de Souza (“Rubens Menin”), AHS Development Group, LLC a.k.a. AHS Residential, LLC a.k.a. RESIA, LLC (“AHS” or “RESIA”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
213	April 8, 2019	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Peter Francis Valori Adam Grant Schultz
214		§ 241 Conspiracy Against Rights &	Amanda Lara Fernandez Damian & Valori, LLP
215		§ 242 Deprivation of Rights Under Color of Law &	Marco Emilio Rojas Nelson Slosbergas
216		§ 1343 Wire Fraud &	Hugo Barreto Del Priore Ernesto Pereira Lopes
217		§ 1349 Conspiracy to Defraud &	Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC
218		§ 1951 Extortion (Hobbs Act) &	Gabriela M. Machado Guimaraes <a href="#">Joseph Horn</a>
219		§ 1961 <i>et seq.</i> – RICO &	Ralph Horn Ricardo Eichenwald
		<b>FLORIDA STATUTES</b>	Fernando Braghin Bridgeloan Investors, Inc.
220		Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise

On April 8, 2019, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>98</sup> (“CCE” or “Criminal Enterprise”) Associates Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Adam Grant Schultz (“Schultz”) (Florida Bar No. 121.111), Amanda L. Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP (“Valori”), and Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), continuing using their bar licenses as guise to extort U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, improperly files,<sup>99</sup> with unclean hands,<sup>100</sup> a [Sham Notice of Appearance on behalf of longtime criminal Associates and Third-Party Defendants Rojas, Rojas’ R&S International Law Group, LLP \(“R&S”\), Nelson Slosbergas \(Florida Bar No. 378.887\), and Nelson Slosbergas, P.A. \(both “Slosbergas”\) \(“Valori Appearance for Rojas, R&S and Slosbergas”\), in the Sham styled-action 139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo Barreto Del Priore, and AHS Residential, LLC, Case No. 2018-29700-CA-04 \(“Sham 139 TH Case”\), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL \(“Miami Courts”\), to falsely remove Tavares from Tavares’ company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. \(“139 TH”\), and steal Properties and rights, after hijacking 139 TH in an invalid Evidentiary Hearing, producing an invalid void Injunction, predicated on fabricated indicia of membership interest of 139 TH. The Record shows criminals Valori \*defending\* their co-conspirators in the scheme extorting Tavares, under color of law.](#)

<sup>98</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly and together furthering Transnational schemes undermining the rule of law to prevent justice.

<sup>99</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 TH’s sole legal authority.

<sup>100</sup> Shameless criminals Peter, Rojas, Slosbergas, *et al.*, Associates of BRIDGELoAN’s CCE, have continuously for years, perpetrated frauds and extortion of Tavares, under color of law, subverting the Miami Courts furthering schemes extorting Tavares of +\$86 million dollars, and fabricating sham lawsuits, *inter alia*, the BCP, the Sham Fraga I, and Fraga II Double-Jeopardy Sham Cases, see [Related Cases](#), and at all relevant times, are fraudulently representing 139 TH with fabricated evidence to hijack Tavares’ 139 TH and steal its Properties. See [Tavares Affidavit](#).

## COUNTS

**Count 213** - Shameless criminals Peter Francis Valori, Amanda Lara Fernandez, Adam Grant Schultz, Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas, Nelson Slosbergas, and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 214-** Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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, *inter alia*, the right to property, and rights to uncorrupted courts of law, rights to own properties in the United States of America, free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 215** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”), in sham proceedings upon subverted Miami Courts, of Tavares’ properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 216** - Shameless criminals Peter F. Valori (“Peter”) ([pvalori@dvlip.com](mailto:pvalori@dvlip.com)), Adam Grant Schultz (“Schultz”) ([aschultz@dvlip.com](mailto:aschultz@dvlip.com)), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”) ([spitta@dvlip.com](mailto:spitta@dvlip.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on April 8, 2019, Via [Electronic Wire](#), to wit - a certain [Sham Notice of Appearance and Designation of Email Addresses](#) (“**Valori Appearance for Rojas, R&S and Slosbergas**”), on Behalf of Third-Party Defendant AHS Development Group, LLC, in the sham styled-case *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), see E-Filing #87649009, and Via E-Mail, to Charles Tavares **(i)** [ctavares@bellsouth.net](mailto:ctavares@bellsouth.net) ; and **(ii)** [charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com), to further criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 217** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further

the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 218** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 219** - At all times relevant, shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 220** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

221	<b>April 8, 2019</b>	<b>U. S. CODE TITLE 18</b>	Peter Francis Valori
		§ 371 Conspiracy to Defraud the USA	Adam Grant Schultz
222		&	Amanda Lara Fernandez
		§ 241 Conspiracy Against Rights	Damian & Valori, LLP
223		&	Marco Emilio Rojas
		§ 242 Deprivation of Rights Under Color of Law	Nelson Slosbergas
224		&	Hugo Barreto Del Priore
		§ 1343 Wire Fraud	Ernesto Pereira Lopes
225		&	Rubens Menin Teixeira de Souza
		§ 1349 Conspiracy to Defraud	AHS Development a.k.a. RESIA, LLC
226		Gabriela M. Machado Guimaraes	
	§ 1951 Extortion (Hobbs Act)	<a href="#">Joseph Horn</a>	
227		Ralph Horn	
	§ 1961 <i>et seq.</i> – RICO	Ricardo Eichenwald	
	&	Fernando Braghin	
228		<b>FLORIDA STATUTES</b>	Bridgeloan Investors, Inc.
	Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise	

On April 8, 2019, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>101</sup> (“CCE” or “Criminal Enterprise”) Associates Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Adam Grant Schultz (“Schultz”) (Florida Bar No. 121.111), Amanda L. Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP (“Valori”), and Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), continuing using their bar licenses as guise to extort U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, improperly files,<sup>102</sup> with unclean hands,<sup>103</sup> a [Sham Motion for Extension of Time](#) to the Extent Necessary to Respond to Defendant’s Unauthorized Third-Party Complaint on behalf of longtime criminal Associates and Third-Party Defendants Rojas, Rojas’ R&S International Law Group, LLP (“R&S”), Nelson Slosbergas (Florida Bar No. 378.887), and Nelson Slosbergas, P.A. (both “Slosbergas”) (“**Valori Motion for Rojas, R&S and Slosbergas**”), in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo Barreto Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), to falsely remove Tavares from Tavares’ company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”), and steal Properties and rights, after hijacking 139 TH in an invalid staged Evidentiary Hearing, producing an invalid void Injunction, predicated on fabricated indicia of membership interest of 139 TH. The Record shows criminals Valori *defending* their co-conspirators in the scheme extorting Tavares, under color of law.

<sup>101</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>102</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 TH’s sole legal authority.

<sup>103</sup> Shameless criminals Peter, Rojas, Slosbergas, *et al.*, Associates of BRIDGELoAN’s CCE, have continuously for years, perpetrated frauds and extortion of Tavares, under color of law, subverting the Miami Courts furthering schemes extorting Tavares of +\$86 million dollars, and fabricating sham lawsuits, *inter alia*, the BCP, the Sham Fraga I, and Fraga II Double-Jeopardy Sham Cases, see [Related Cases](#), and at all relevant times, are fraudulently representing 139 TH with fabricated evidence to hijack Tavares’ 139 TH and steal its Properties. See [Tavares Affidavit](#).



## COUNTS

**Count 221** - Shameless criminals Peter Francis Valori, Amanda Lara Fernandez, Adam Grant Schultz, Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas, Nelson Slosbergas, and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 222**- Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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, *inter alia*, the right to property, and rights to uncorrupted courts of law, rights to own properties in the United States of America, free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 223** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”), in sham proceedings upon subverted Miami Courts, of Tavares’ properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 224** - Shameless criminals Peter F. Valori (“Peter”) ([pvalori@dvlip.com](mailto:pvalori@dvlip.com)), Adam Grant Schultz (“Schultz”) ([aschultz@dvlip.com](mailto:aschultz@dvlip.com)), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”) ([spitta@dvlip.com](mailto:spitta@dvlip.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on April 8, 2019, Via [Electronic Wire](#), to wit - a certain [Sham Motion for Extension of Time](#) to the Extent Necessary to Respond to Defendant’s Unauthorized Third-Party Complaint on behalf of longtime criminal Associates and Third-Party Defendants Rojas, Rojas’ R&S International Law Group, LLP (“**Valori Motion for Rojas, R&S and Slosbergas**”), on Behalf of Third-Party Defendant AHS Development Group, LLC, in the sham styled-case *139 TH Avenue SW 8 TH Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), see E-Filing #87649009, and Via E-Mail, to Charles Tavares (i) [ctavares@bellsouth.net](mailto:ctavares@bellsouth.net) ; and (ii) [charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com), to further criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 225** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and



agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 226** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 227** - At all times relevant, shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 228** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
229	<b>April 10, 2019</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Gabriela M. Machado Guimaraes Peter Francis Valori Marco Emilio Rojas
230		§ 241 Conspiracy Against Rights &	Nelson Slosbergas NS Corporate Services, Inc.
231		§ 1343 Wire Fraud &	Wolters Kluwer Koutoulas & Relis, LLC
232		§ 1349 Conspiracy to Defraud &	Erick Schultz Magno Hugo Barreto Del Priore
233		§ 1951 Extortion (Hobbs Act) &	Ernesto Pereira Lopes Rubens Menin Teixeira de Souza
234		§ 1961 <i>et seq.</i> – RICO &	AHS Development a.k.a. RESIA, LLC <a href="#">Joseph Horn</a>
235		<b>U.S. CODE TITLE 26</b> - § 7206 – Tax Frauds &	Ralph Horn Ricardo Eichenwald
236		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On April 8, 2019, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>104</sup> (“CCE” or “Criminal Enterprise”) Associate Gabriela Maranhao Machado Guimaraes<sup>105</sup> (“Guimaraes”), furthering a continued and ongoing criminal scheme depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, improperly filing,<sup>106</sup> with unclean hands,<sup>107</sup> a fraudulent U.S. Tax Filing for 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) (“**139 TH’s Fraudulent IRS Filing**”), for taxable year 12/2018. Guimaraes, *et al.*, knowingly and intentionally fraudulently use Tavares’ company IBAC Asset Holders, Inc., a Florida corp. (“IBAC”), and Tavares’ IBAC’s address for 139 TH’s Fraudulent IRS Filing, without Tavares’ knowledge or consent. 139 TH’s Fraudulent IRS Filing is part of the ongoing scheme extorting Tavares in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo Barreto Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”). To further the scheme, Guimaraes willfully transmits, Via E-mail across state lines, 139 TH’s Fraudulent IRS Filing.

<sup>104</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>105</sup> [Guimaraes is a longtime criminal](#) Associate of BRIDGELoAN’s CCE, coming to the United States of America on March 27, 2001, with a fraudulent U.S. Visa, to, *inter alia*, money launder more than \$30 million dollars of her father’s – Brazilian politician Gilson Machado Guimaraes Filho (“Gilson Machado”), illicit funds from bribes, from among others, PETROBRAS S.A. (Nasdaq: PBR), systematically, and continuously to this date, perpetrating [Portfolio Tax-Free Bond and Tax Frauds](#), through the United States of America. Guimaraes is also implicated in the systematic deprivation and extortion of Tavares properties and rights to financially destroy and silence Tavares to prevent justice.

<sup>106</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 TH’s sole legal authority.

<sup>107</sup> Shameless criminals Guimaraes, Peter, Rojas, *et al.*, Associates of BRIDGELoAN’s CCE, have continuously for years, perpetrated frauds and extortion of Tavares, under color of law, subverting the Miami Courts furthering schemes extorting Tavares of +\$86 million dollars, and fabricating sham lawsuits, *inter alia*, the BCP, the Sham Fraga I, and Fraga II Double-Jeopardy Sham Cases, see [Related Cases](#), and at all relevant times, are fraudulently representing 139 TH with fabricated evidence to hijack Tavares’ 139 TH and steal its Properties. See [Tavares Affidavit](#).

## COUNTS

**Count 229** - Shameless criminals Gabriela Maranhao Machado Guimaraes, Marco E. Rojas, Nelson Slosbergas, and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 230**- Shameless criminals Gabriela Maranhao Machado Guimaraes, Marco E. Rojas, Nelson Slosbergas, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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, *inter alia*, the right to property, and rights to uncorrupted courts of law, rights to own properties in the United States of America, free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 231** - Shameless criminals Gabriela Machado Guimaraes ([gabriela@g2investusa.com](mailto:gabriela@g2investusa.com)), Marco E. Rojas ([mrojas@rsmiami.com](mailto:mrojas@rsmiami.com)), Nelson Slosbergas ([nelson@miami-intl-law.com](mailto:nelson@miami-intl-law.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares ("Tavares") and Tavares' company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH") of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of honest services, knowingly and intentionally, transmits, Via E-Mail, on April 10, 2019 at 5:10 pm, a certain email title "2018's Tax Returns 139 TH LLC & k1", containing fraudulent Tax Filings with the United States of America's Internal Revenue Service ("**139 TH's Fraudulent IRS Filing**"), in name, and with an address for Tavares' IBAC Asset Holders, Inc., a Florida corp., on behalf of 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. ("139 TH"), see IRS Filing #87410201812310002005030436512 024070000 2, to: **(a)** Charles Tavares ([ctavares@bellsouth.net](mailto:ctavares@bellsouth.net)); **(b)** Peter Valori ([pvalori@dvllp.com](mailto:pvalori@dvllp.com)); **(c)** Marco Rojas ([mrojas@rsmiami.com](mailto:mrojas@rsmiami.com)); **(d)** Veronica Vergara ([veronicavergara@inversionesemmi.com](mailto:veronicavergara@inversionesemmi.com)); **(e)** Franciso Mesa ([fmesa888@gmail.com](mailto:fmesa888@gmail.com)); **(f)** Mario A. Martins Pereira ([marcelademeyer@gmail.com](mailto:marcelademeyer@gmail.com)); **(g)** Magali Nader Vieira ([magaly@ruyvieira.com.br](mailto:magaly@ruyvieira.com.br)); **(h)** Steve Relis ([sr@krccpas.us](mailto:sr@krccpas.us)); **(i)** Elba Valdes ([flamarble@msn.com](mailto:flamarble@msn.com)); **(j)** Maria Fernanda Brandao Vilela ([fernandavilela\\_advogada@hotmail.com](mailto:fernandavilela_advogada@hotmail.com)); **(k)** Wolters Kluwer ([smallbusinesssteam@wolterskluwer.com](mailto:smallbusinesssteam@wolterskluwer.com)); **(l)** Eric Schultz Magno ([emagno@magnolaw.com](mailto:emagno@magnolaw.com)); **(m)** Jonathan Morton ([jonathan@grantmortonlaw.com](mailto:jonathan@grantmortonlaw.com)); and **(n)** Paulo Leite ([pauloleiteconsultoria@gmail.com](mailto:pauloleiteconsultoria@gmail.com)), to further known criminal schemes against U.S. citizens, the State of Florida, and the United States of America, in violation of Title 18 U.S.C. §1343.

**Count 232** – Criminals Gabriela Guimaraes, Marco Rojas, Nelson Slosbergas, and other Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, and the United States, in violation of, Title 18, U.S.C., § 1349.

**Count 233**- Shameless criminals Gabriela Maranhao Machado Guimaraes, Marco E. Rojas, Nelson Slosbergas, and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to

systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 234** - At all times relevant, shameless criminals Gabriela Machado Guimaraes, Marco E. Rojas, Nelson Slosbergas, and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, tax frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 235** – Shameless criminals Gabriela Guimaraes, Marco E. Rojas, Nelson Slosbergas, and other Perpetrators implicated, knowingly and intentionally, file through electronic wire, on April 10, 2019, a certain fraudulent Tax Filings with the United States of America’s Internal Revenue Service (“**139 TH’s Fraudulent IRS Filing**”), in name, and with an address for Tavares’ IBAC Asset Holders, Inc., a Florida corp., on behalf of 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”), see IRS Filing #8741 0 2018 1231 0002005030 4 3651202407 0000 2, to further tax schemes against the United States, as part of an underlying criminal scheme, contrary to, Title 26, U.S.C. §7206.

**Count 236** – Shameless criminals Gabriela Maranhao Machado Guimaraes, Marco E. Rojas, Nelson Slosbergas, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

237	<b>April 16, 2019 From</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the United States &	Carlos Manuel Guzman Chief Judge Bertila Ana Soto Miami Courts Peter Francis Valori Amanda Lara Fernandez Damian & Valori, LLP Marco Emilio Rojas Lisa M. Sheib Mauricio Mendez Samantha L. Todd Daughters Reporting, Inc. The Continued Criminal Enterprise
238		§ 241 Conspiracy Against Rights &	
239		§ 242 Deprivation of Rights Under Color of Law &	
240		§ 1349 Conspiracy to Defraud &	
241		§ 1961 <i>et seq.</i> – RICO &	
242		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices &	
243		<b>FLORIDA CODE OF JUDICIAL CONDUCT</b> Violations of Canons 1, 2, and 3	

On April 16, 2019, reckless and corrupt Judge [Carlos Manuel Guzman](#) (“Judge Guzman”) (Florida Bar No. 115.990), after knowingly and intentionally entering a [Sham Notice of Non-Jury Trial on January 24, 2019](#), in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), contrary to, *inter alia*, [Florida Rule of Civil Procedure 1.440](#), due process of law, U.S. citizen Charles Tavares’ (“Tavares”) rights, and the record displayed showing that there are motions pending before the court, *e.g.*, a [Plaintiff’s Motion for Summary Judgment](#), to further a brazen scheme systematically depriving and extorting Tavares of all properties and rights in subverted proceedings, presiding a **Kangaroo Court**, staging a sham Non-Jury Trial (“**Sham Trial of April 16, 2019**”). The Record displayed shows Joseph Horn’s Bridgeloan Investors, Inc.’s<sup>108</sup> (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and its Associates corrupting and subverting Miami Courts to extort Tavares of all properties and rights, under color of law. To further the scheme, corrupt Judge Guzman, knowingly and intentionally, never enters a proper<sup>109</sup> Order setting the Sham Trial of April 16, 2019, nor allows Tavares to call up witnesses properly served subpoenas, including, among others, the CCE’s Associates Nelson Slosbergas (“Slosbergas”), and Gabriela Machado Guimaraes (“Guimaraes”), falsely representing Tavares’ 139 Th with fabricated authority. As part of the scheme, longtime criminal Marco E. Rojas (“Rojas”) is the only witnesses for Associates Peter Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), and Damian & Valori (“Valori”), falsely representing Tavares’ 139 TH with hijacked authority of 139 TH, in a courtroom having two (02) armed Miami-Dade County Police Officers to further intimidate, coerce, and extort victim Tavares, under color of law.

<sup>108</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>109</sup> Corrupt Judge Guzman and the subverted Miami Courts, improperly and invalidly, set the Sham Trial of April 16, 2019, by allegedly “[ADVISED BOTH PARTIES TELEPHONICALLY](#)”, on April 3, 2019, in violation of [Fla. R. Civ. P. 1.440\(c\)](#), due process of law, and rights – and, despite the fact the Record shows eight (08) parties to the styled-action, and not two (02) - “**both parties**”, and willfully, to deprive and extort Tavares, never enters an Order granting or denying Tavares’ Motion to Continue Trial heard by corrupt Judge Guzman on a [Hearing of April 1, 2019](#).



Corrupt Judge Guzman, continuing to further the criminal scheme<sup>110</sup> upon subverted Miami Courts, depriving and extorting, under color of law, Tavares of properties and rights, presides over an invalid and improperly set and noticed<sup>111</sup> staged Sham Non-Jury Trial to extort Tavares. From 10:17 a.m., through 2:45 p.m., corrupt Judge Guzman presides the invalid sham Non-Jury Trial to extort Tavares, attended by criminals Peter, Fernandez, Rojas, and corrupt Court Reporter Lisa M. Sheib<sup>112</sup> (“Sheib”) at Daughters Reporting, Inc. (“Daughters Court Reporters”), two (02) Miami-Dade County Police officers, a clerk, and Tavares pro se. Because Judge Guzman and the Miami Courts’ violations of law, due process, and Tavares’ constitutional guarantees, Tavares is denied an opportunity to properly present Tavares’ meritorious cause, depose and call [duly subpoenaed and served](#) material witnesses.<sup>113</sup> During the sham proceedings, criminal Rojas, falsely appearing as 139 TH’s “*Vice President of Litigation*”, knowingly and intentionally, repeatedly commits perjury in an official proceeding, even lying under oath, that attorney Rojas never represented Tavares in conflict, see [Transcript of Sham Trial](#) (E-Filing #91756331, filed on 06/27/2019) (“Tr.”) 129 at ¶¶ 3 – 25, and *Id.* 130 at ¶¶ 1 – 17. During the improper and invalid Sham Trial of April 16, 2019, Tavares asks corrupt Judge Guzman if he had entered an Order on Tavares’ Motion to Continue Trial, heard by corrupt Judge Guzman on April 1, 2019. Shameless corrupt Judge Guzman responds, “I – we [ <sup>114</sup> ] *denied it after the calendar call* [April 1, 2019]. That’s why you’re here today [Sham Trial of April 16, 2019, purportedly Noticed to “*both parties telephonically*”]. See Tr. 169 at ¶¶ 23 – 24. The Record displayed shows that corrupt Judge Guzman and the subverted Miami Courts never enter of file an Order granting or denying Tavares’ Motion to Continue Trial, and that corrupt Judge Guzman and the subverted Miami Courts only entered an Order Denying Recusal on Tavares’ two (02) Motions to Recuse corrupt Judge Guzman for systematic violations of law, rules, due process of law, and Tavares’ rights, more than one (01) hour after the end of the Sham Trial of April 16, 2019. At all times relevant, Judge Guzman and the Perpetrators, knowingly and intentionally, systematically deprive and extort U.S. citizen Tavares of properties and rights, under color of law, and deprive the State of Florida and the United States of America of honest services upon courts of law.

<sup>110</sup> The Record displayed shows, among other things, BRIDGELOAN’s CCE continuing with ongoing schemes depriving and extorting Tavares of all properties and rights in Nine (09) Sham Related Cases, using coercion, intimidation, threats, and extortion against Tavares and others, and systematically fabricating false evidence in support of sham pleadings, and corrupting the judicial machinery to further the schemes and prevent justice, further depriving the State of Florida and the United States of America of honest services. See The Record & [Tavares Affidavit](#).

<sup>111</sup> The [Record displayed](#), purportedly shows that, the Court noticed verbally – “**Advised Both Parties Telephonically**”, when the Record also shows there are eight (08) Parties to the styled-action and not two (02), the sham Trial of April 16, 2019 on April 3, 2019, deeming the Notice of Trial invalid, and holding the Sham Trial of April 16, 2019 absolutely improper and invalid. See [Fla. R. Civ. P. 1.440](#), and see also, *Gawker Media, LLC v. Bollea*, 170 So. 3d 125, 129 (Fla. 2d DCA2015), stating, “*For years, the appellate courts of this state have emphasized that rule 1.440’s specifications are mandatory*”; and, *Precision Constructors, Inc. v. Valtec Constrc.*, 825 So. 2d 1062, 1063 (Fla 3d DCA 2002), stating, “*failure to adhere strictly to the mandates of rule 1.440 constitutes error.*” But because, *inter alia*, there are, at least, two (02) implicated judges in the Third District Court of Appeal of Florida (“3<sup>rd</sup> DCA”), corrupt Judges Norma Shepard Lindsey (“Judge Lindsey” (Florida Bar No. 994.812) and Bronwyn C. Miller (“Judge Miller”) (Florida Bar No.119.441), corrupt Judge Guzman and the CCE know they will not be corrected.

<sup>112</sup> The Record displayed shows BRIDGELOAN’s CCE corruptive powers by, *inter alia*, systematically corrupting Sheib and Daughters Court Reporters to, knowingly and intentionally, fabricating and defrauding the transcribed Transcript of sham proceedings, depriving and extorting Tavares, under color of law, of properties and rights. Because Tavares had noticed the scheme fraudulently transcribing sham proceedings in previous hearings, see, e.g., on the hearing of April 1, 2019 on Tavares’ Motion to Continue Trial, Tavares records the full hearing, and is able to show one hundred & nine (109) [fabricated and distorted paragraphs](#), clearly done to obstruct justice, showing artifices allowing the CCE to deprive and extort any citizen, company, the State of Florida, or the United States, of honest services. See [Tavares’ Demand of June 18, 2019](#).

<sup>113</sup> Among other material witnesses duly called for depositions and to be Tavares’ witnesses, Tavares’ partner Joao Tenorio, Francisco Mesa Schuler, and Third-Party Defendants Rojas, Rojas’ R&S, Slosbergas and Slosbergas, P.A., Hugo Barreto Del Priore, and AHS Development, LLC.

<sup>114</sup> When corrupt Judge Guzman states “*We denied it*”, he is referring to the Criminal Enterprise subverting the proceedings to extort.



## COUNTS

**Count 237** - Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 238**- Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, rights to uncorrupted courts of law, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 239** - Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally, systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”) in sham proceedings, and willfully deprive Tavares of properties and rights by entering a Order for Trial, upon subverted Miami Courts, depriving Tavares of rights and properties, in violation of, 18 U.S.C. §242.

**Count 240** – Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 241** - At all times relevant, reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the

enterprise, and engaged in various related criminal activities, including but not limited to, holding sham hearings extorting U.S. citizen Charles Tavares of properties and rights, and entering a Sham Injunction to deprive and extort, under color of law, Tavares of properties and rights, false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

**Count 242** – Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, Peter F. Valori (“Peter”) (Florida Bar No. 43.516), and Amanda Lara Fernandez (“Fernandez”) (Florida Bar No. 106.931) at Damian & Valori, LLP (“Valori”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices to deprive Tavares of rights and properties upon sham proceedings, further, knowingly and intentionally subverting Florida courts to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**Count 243** – Reckless Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, and other officers of the court implicated, did knowingly and intentionally, improperly use their judicial powers as guise to commit crimes, willfully participating in a brazen known criminal scheme, by, *inter alia*, presiding a **Kangaroo Court**, to, knowingly and intentionally deprive and extort U.S. citizen Charles Tavares’ (“Tavares”) in sham proceedings, entering a sham Order for Trial, and presiding an invalid set and noticed Sham Non-Jury Trial of April 16, 2019 to deprive and extort Tavares of properties and rights, knowingly and intentionally furthering the systematic subversion of Florida Courts by, among others, BRIDGELOAN’S CCE’S Associates, systematically depriving, extorting Tavares of all properties, and violating, under color of law, Tavares’ constitutionally guaranteed rights and due process of law, further depriving the State of Florida, and the United States of America, of honest services upon courts of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
244	<b>April 22, 2019 at 10:22 AM</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Peter Francis Valori Adam Grant Schultz Amanda Lara Fernandez
245		§ 241 Conspiracy Against Rights &	Damian & Valori, LLP Marco Emilio Rojas
246		§ 242 Deprivation of Rights Under Color of Law &	Nelson Slosbergas Hugo Barreto Del Priore
247		§ 1343 Wire Fraud &	Ernesto Pereira Lopes Rubens Menin Teixeira de Souza
248		§ 1349 Conspiracy to Defraud &	AHS Development a.k.a. RESIA, LLC Gabriela M. Machado Guimaraes
249		§ 1951 Extortion (Hobbs Act) &	<a href="#">Joseph Horn</a> Ralph Horn
250		§ 1961 <i>et seq.</i> – RICO &	Ricardo Eichenwald Fernando Braghin
251		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On April 22, 2019, Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s<sup>115</sup> (“CCE” or “Criminal Enterprise”) Associates Peter F. Valori (“Peter”) (Florida Bar No. 43.516), Adam Grant Schultz (“Schultz”) (Florida Bar No. 121.111), Amanda L. Fernandez (“Fernandez”) (Florida Bar No. 106.931), Damian & Valori, LLP (“Valori”), and Marco E. Rojas (“Rojas”) (Florida Bar No. 940.453), continuing using their bar licenses as guise to extort U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, improperly files,<sup>116</sup> with unclean hands,<sup>117</sup> a [Sham Notice of Cancellation of Hearing](#) on April 22, 2019 at 3:15 p.m. (“**Sham Notice Cancellation**”), on Valori’s Plaintiff’s Motion for Summary Judgment, showing, *inter alia*, that the action was not at issue, and displaying the brazen scheme depriving and extorting Tavares of properties and rights in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo Barreto Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”), to falsely remove Tavares from Tavares’ company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”), and steal Properties and rights, after hijacking 139 TH in an invalid staged Evidentiary Hearing, and staging an invalid Sham Trial of April 16, 2019. The Record shows, *inter alia*, the proceedings totally vitiated by fraud upon the court, showing the total corruption of shameless Judge Guzman, and the subversion of the Miami Courts, further depriving the State of Florida of honest services upon the courts.

<sup>115</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>116</sup> Since [August 2013](#), Tavares at all times a shareholder of 139 TH, pursuant to an [agreed settlement between Tavares and Tavares’ partner](#), West Eighth’s principal Joao Tenorio (“Tenorio”), Tavares became 139 TH’s 52% interest sole majority Member, and 139 TH’s sole legal authority.

<sup>117</sup> Shameless criminals Peter, Rojas, Slosbergas, *et al.*, Associates of BRIDGELoAN’s CCE, have continuously for years, perpetrated frauds and extortion of Tavares, under color of law, subverting the Miami Courts furthering schemes extorting Tavares of +\$86 million dollars, and fabricating sham lawsuits, *inter alia*, the BCP, the Sham Fraga I, and Fraga II Double-Jeopardy Sham Cases, see [Related Cases](#), and at all relevant times, are fraudulently representing 139 TH with fabricated evidence to hijack Tavares’ 139 TH and steal its Properties. See [Tavares Affidavit](#).

## **COUNTS**

**Count 244** - Shameless criminals Peter Francis Valori, Amanda Lara Fernandez, Adam Grant Schultz, Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas, Nelson Slosbergas, and other 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 245**- Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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, *inter alia*, the right to property, and rights to uncorrupted courts of law, rights to own properties in the United States of America, free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 246** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”), in sham proceedings upon subverted Miami Courts, of Tavares’ properties and constitutionally guaranteed rights, in violation of, 18 U.S.C. §242.

**Count 247** - Shameless criminals Peter F. Valori (“Peter”) ([pvalori@dvlip.com](mailto:pvalori@dvlip.com)), Amanda Lara Fernandez (“Fernandez”) ([afernandez@dvlip.com](mailto:afernandez@dvlip.com)), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”) ([spitta@dvlip.com](mailto:spitta@dvlip.com)), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, transmits, Via [Florida Courts E-Filing Portal](#), on April 22, 2019 at 10:22 a.m., Via Electronic Wire, to wit - a certain [Sham Notice of Cancellation of Hearing of April 22, 2019 at 3:15 p.m.](#), on Valori’s Plaintiff’s Motion for Summary Judgment, see E-Filing #88293425, and Via E-Mail, to Charles Tavares (i) [ctavares@bellsouth.net](mailto:ctavares@bellsouth.net) ; and (ii) [charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com), to further criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 248** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 249** - Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, deprive, and extort Charles Tavares (“Tavares”) of properties and rights, and other Members of 139 TH, to further an underlying continuous scheme depriving stealing, and extorting all of Tavares’ properties and rights, under color of law, upon subverted Miami Courts, and transferring the aforesaid properties across state lines, and stealing millions of dollars in ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

**Count 250** - At all times relevant, shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”) Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting the proper functions of courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See [Tavares Sworn Affidavit](#).

**Count 251** – Shameless criminals Peter F. Valori (“Peter”), Amanda Lara Fernandez (“Fernandez”), Adam Grant Schultz (“Schultz”), Damian & Valori, LLP a.k.a. Damian | Valori | Culmo Law (“Valori”), Marco E. Rojas (“Rojas”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares’ 139 TH, producing sham corporate resolutions of 139 TH, and fabricating a Sham 139 TH Case, transmitting a sham Complaint with false claims and fabricated evidence to, *inter alia*, [Florida Courts E-Filing Portal](#), to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

252	<b>April 23, 2019</b>	<b>U. S. CODE TITLE 18</b>	Norma Shepard Lindsey Ivan F. Fernandez Eric Wm. Hendon Third District Court Appeal Florida The Continued Criminal Enterprise
253		§ 371 Conspiracy to Defraud the United States &	
254		§ 241 Conspiracy Against Rights &	
255		§ 242 Deprivation of Rights Under Color of Law &	
256		§ 1349 Conspiracy to Defraud &	
257		§ 1961 <i>et seq.</i> – RICO &	
258		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices &	
		<b>FLORIDA CODE OF JUDICIAL CONDUCT</b> Violations of Canons 1, 2, and 3	

On April 23, 2019, a Two Panel<sup>118</sup> of reckless judges of the Third District Court of Appeal of Florida (“3<sup>rd</sup> DCA”), to further a criminal scheme depriving U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, and to prevent justice, knowingly and intentionally, recklessly enter, in *Charles Tavares v. 139 TH Avenue SW 8 Street, LLC*, Appeal No. 3D19-0249 (“Tavares’ Appeal”) before the Third District Court of Appeal of Florida (“3<sup>rd</sup> DCA”), from the lower case Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) a Sham [Order granting attorney’s fees and costs](#) against Tavares (“**Order Fees**”), contrary to, *inter alia*, Art. V, § 4(a), Florida Constitution – requiring a minimum of three (03) judges in a Panel adjudicating a matter, due process of law, and Tavares’ rights. The record shows corrupt Judge Lindsey<sup>119</sup> implicated in several underlying schemes depriving Tavares of properties and rights, and is placed in the Panel, tainting the proceedings, willfully continuing depriving Tavares of properties and rights. The Record shows Bridgeloan Investors, Inc.’s<sup>120</sup> (“BRIDGELOAN”) Transnational Criminal Enterprise (“CCE” or Criminal Enterprise”) total hold over Florida’s judicial machinery, depriving citizens, the State of Florida, and the United States.

<sup>118</sup> Judges Norma Shepard Lindsey (“Lindsey”) (Florida Bar No.994.812) is recused, and Ivan F. Fernandez (“Judge Fernandez”) (Florida Bar No. 977.926), and Eric Wm. Hendon (“Judge Hendon”) (Deceased) improperly form a two (2) Panel Judge, fraudulently adjudicating the matter contrary to the constitutionally required Panel of Three (03) appeal judges, as corrupt Judge Lindsey is recused for bias and conflicts.

<sup>119</sup> Judge Lindsey is directly implicated in dozens of violations of law, the constitution, rights, and Florida Code of Judicial Conduct, by, *inter alia*, knowingly and intentionally, to further schemes depriving and extorting Tavares of properties and rights, under color of law, upon subverting proceedings, presiding, in known [conflict of interest as wife to implicated opposing](#) attorney Harold Eugene Lindsey III (Lindsey III”), [four \(04\)](#) of Tavares’ [Related Cases](#), systematically holdings sham hearings, and entering reckless rulings against law and the constitution to extort Tavares, and depriving the State of Florida and the United States of America of honest services upon courts of law. See Record, and [Tavares’ Affidavit](#).

<sup>120</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.



## COUNTS

**Count 252** - Reckless Judges Norma Shepard Lindsey (“Lindsey”) (Florida Bar No.994.812), Ivan F. Fernandez (“Judge Fernandez”) (Florida Bar No. 977.926), and Eric Wm. Hendon (Deceased), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 253** - Reckless Judges Norma Shepard Lindsey (“Lindsey”) (Florida Bar No.994.812), Ivan F. Fernandez (“Judge Fernandez”) (Florida Bar No. 977.926), and Eric Wm. Hendon (Deceased), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, rights to uncorrupted courts of law, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 254** - Reckless Judges Norma Shepard Lindsey (“Lindsey”) (Florida Bar No.994.812), Ivan F. Fernandez (“Judge Fernandez”) (Florida Bar No. 977.926), and Eric Wm. Hendon (Deceased), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally, systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”) in sham proceedings, and willfully deprive Tavares of properties and rights by entering a Order for Trial, upon subverted Miami Courts, depriving Tavares of rights and properties, in violation of, 18 U.S.C. §242.

**Count 255** – Reckless Judges Norma Shepard Lindsey (“Lindsey”) (Florida Bar No.994.812), Ivan F. Fernandez (“Judge Fernandez”) (Florida Bar No. 977.926), and Eric Wm. Hendon (Deceased), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 256** - At all times relevant, reckless Judges Norma Shepard Lindsey (“Lindsey”) (Florida Bar No.994.812), Ivan F. Fernandez (“Judge Fernandez”) (Florida Bar No. 977.926), and Eric Wm. Hendon (Deceased), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to, entering sham orders extorting U.S. citizen Charles Tavares of properties and rights, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds,

systematically corrupting and subverting courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 257** – Reckless Judges Norma Shepard Lindsey (“Lindsey”) (Florida Bar No.994.812), Ivan F. Fernandez (“Judge Fernandez”) (Florida Bar No. 977.926), and Eric Wm. Hendon (Deceased), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices to deprive Tavares of rights and properties upon sham proceedings, entering invalid sham Orders, preventing justice, further, knowingly and intentionally subverting Florida courts to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**Count 258** – Reckless Judges Norma Shepard Lindsey (“Lindsey”) (Florida Bar No.994.812), Ivan F. Fernandez (“Judge Fernandez”) (Florida Bar No. 977.926), and Eric Wm. Hendon (Deceased), and other officers of the court implicated, did knowingly and intentionally, improperly use their judicial powers as guise to commit crimes, willfully participating in a brazen known criminal scheme, by, *inter alia*, fraudulently adjudicating – [with a two \(02\) judge Panel](#), contrary to, *inter alia*, Art. V, § 4(a), Florida Constitution – requiring a minimum of three (03) judges in a Panel adjudicating a matter, due process of law, and Tavares' rights, the Appeal *Charles Tavares v. 139TH Avenue SW 8 Street, LLC*, Case No. 3D19-0249, to, knowingly and intentionally deprive and extort U.S. citizen Charles Tavares' (“Tavares”) in sham proceedings, and entering, on April 23, 2019, a sham Order Granting criminals Peter F. Valori, Amanda Lara Fernandez, Adam Grant Schultz, Russell Marc Landy, and Damian & Valori, LLP, sham legal fees and costs for fraudulent services while falsely representing Tavares' 139TH Avenue SW 8 Street, LLC (“139 TH”), with false and invalid authority, predicated on fabricated indicia of membership interest of 139 TH, knowingly and intentionally furthering the systematic subversion of Florida Courts by, among others, BRIDGELoan'S CCE'S Associates, systematically depriving, extorting Tavares of all properties, and violating, under color of law, Tavares' constitutionally guaranteed rights and due process of law, further depriving the State of Florida, and the United States of America, of honest services upon courts of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

<b>COUNT</b>	<b>APROX. DATE</b>	<b>VIOLATIONS</b>	<b>PERPETRATORS</b>
259	<b>May 29, 2019 at 4:24 PM</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the United States &	Carlos Manuel Guzman Miami Courts The Continued Criminal Enterprise
260		§ 241 Conspiracy Against Rights &	
261		§ 242 Deprivation of Rights Under Color of Law &	
262		§ 1349 Conspiracy to Defraud &	
263		§ 1343 Wire Fraud &	
264		§ 1961 <i>et seq.</i> – RICO &	
265		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices &	
266	<b>FLORIDA CODE OF JUDICIAL CONDUCT</b> Violations of Canons 1, 2, and 3		

On May 29, 2019, reckless and corrupt Judge [Carlos Manuel Guzman](#) (“Judge Guzman”) (Florida Bar No. 115.990), after, among other things, knowingly and intentionally holding an invalid<sup>121</sup> and illegal Sham Non-Jury Trial of April 16, 2019 to willfully further a brazen criminal scheme systematically depriving and extorting U.S. citizen Charles Tavares (“Tavares”) in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) – and in other eight (08) Related Cases, enters a facially invalid and fraudulent [Final Judgment](#) (“**Sham Final Judgment**”). At all relevant times, shameless corrupt Judge Guzman, and the Miami Courts, know, in truth and in fact, that the Sham Final Judgment is predicated on an improperly held Non-Jury Trial of April 16, 2019, further predicated on, among other things, false and invalid authority fabricated by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise’s<sup>122</sup> (“Criminal Enterprise” or “CCE”) Associates Peter F. Valori (Florida Bar No. 43.516), Amanda Lara Fernandez (Florida Bar No. 106.931), Damian & Valori, LLP, Nelson Slosbergas (Florida Bar No. 378.88), and Marco E. Rojas (Florida Bar No. 940.453), acting with fraudulent authority of Tavares’ Company 139 TH Avenue SW 8 Street, LLC (“139 TH”), fabricated by Slosbergas, Rojas, *et al.*, to trick the Miami Courts in sham proceedings. The facially Sham Final Judgment fraudulently states, to further the scheme, that, “*This Cause having come before this Court on a bench trial on April 23, 2019, and the Court having considered the evidence, the testimony –*”, showing, *inter alia*, the Sham Final Judgment is fraudulent, and forever null and void.

<sup>121</sup> Corrupt Judge Guzman and the subverted Miami Courts, improperly and invalidly, set the Sham Trial of April 16, 2019, by allegedly “[ADVISED BOTH PARTIES TELEPHONICALLY](#)”, on April 3, 2019, in violation of [Fla. R. Civ. P. 1.440\(c\)](#), due process of law, and rights – and, despite the fact the Record shows eight (08) parties to the styled-action, and not two (02) - “*both parties*”, and willfully, to deprive and extort Tavares, never enters an Order granting or denying Tavares’ Motion to Continue Trial heard by corrupt Judge Guzman on a [Hearing of April 1, 2019](#).

<sup>122</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

## **COUNTS**

**Count 259** - Reckless corrupt Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 260**- Reckless corrupt Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, rights to uncorrupted courts of law, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 261** - Reckless corrupt Judge Carlos Manuel Guzman (“Judge Guzman”)(Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally, systematically deprive and extort, under color of law, U.S. citizen Charles Tavares (“Tavares”) in sham proceedings, and willfully deprive Tavares of properties and rights by entering an Order for Trial, upon subverted Miami Courts, depriving Tavares of rights and properties, in violation of, 18 U.S.C. §242.

**Count 262** – Reckless corrupt Judge Carlos Manuel Guzman (“Judge Guzman”)(Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 263** – Reckless corrupt Judge Carlos M. Guzman (“Judge Guzman”) (Florida Bar No. 115.990), and Miami Courts, knowingly and intentionally conspiring together with BRIDGELoan’s CCE to deprive and extort U.S. citizen Charles Tavares (“Tavares”) and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) of properties and rights, under color of law, furthering an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, further depriving the State of Florida and the United States of America of honest services, knowingly and intentionally, cause to be transmitted, Via Electronic Wire, across state lines, on May 29, 2019 at 4:24 p.m., a certain [Facially Fraudulent Final Judgment](#) (“**Sham Final Judgment**”), in the sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) see E-Filing #90265837, to, **(a)** AHS Development Group, LLC ([gss@saadelaw.com](mailto:gss@saadelaw.com)); **(b)** AHS Development Group, LLC ([drivera@ahsresidential.com](mailto:drivera@ahsresidential.com)); **(c)** AHS Development Group, LLC ([mbonner@bonner-law.com](mailto:mbonner@bonner-law.com)); **(d)** Adam Schultz ([aschultz@dvllp.com](mailto:aschultz@dvllp.com)); **(e)** Amanda Lara Fernandez ([spitta@dvllp.com](mailto:spitta@dvllp.com)) ([afernandez@dvllp.com](mailto:afernandez@dvllp.com)); **(f)** Antonio Carlos de Almeida Castro [KAKAY] ([kakay@almeidacastro.com.br](mailto:kakay@almeidacastro.com.br)); **(g)** Chief Judge Bertila Ana Soto ([bsoto@jud11.flcourts.org](mailto:bsoto@jud11.flcourts.org)); **(h)** Bruno

Patrice Cerini ([pcerini@aol.com](mailto:pcerini@aol.com)); (i) Charles Tavares ([charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com)) ([ctavares@bellsouth.net](mailto:ctavares@bellsouth.net)) ; (j) Corporate Management Services, LLC ([mrojas@rsmiami.com](mailto:mrojas@rsmiami.com)); (k) Emerson Tenorio ([emagno@magnolaw.com](mailto:emagno@magnolaw.com)) ([flaviaptenorio@gmail.com](mailto:flaviaptenorio@gmail.com)); (l) Fernando Menendez Montes<sup>123</sup> ([gabriela@g2investusa.com](mailto:gabriela@g2investusa.com)); (m) George K. Kidman ([investor.relations@wba.com](mailto:investor.relations@wba.com)); (n) Gabriela Maranhao Machado Guimaraes ([gabriela@g2investusa.com](mailto:gabriela@g2investusa.com)); (o) Hugo Barreto Del Priore ([hdelpriore@argonpart.com.br](mailto:hdelpriore@argonpart.com.br)); (p) Paulo Leite ([pauloleiteconsultoria@gmail.com](mailto:pauloleiteconsultoria@gmail.com)); (q) Peter F. Valori ([pvalori@dvllp.com](mailto:pvalori@dvllp.com)); and (r) Walgreens Boots Alliance, Inc. ([investor.relations@wba.com](mailto:investor.relations@wba.com)), to further brazen criminal schemes upon Florida courts, in violation of Title 18 U.S.C. §1343.

**Count 264** - At all times relevant, reckless corrupting Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to, holding sham hearings and a Sham Trial of April 16, 2019, entering a facially fraudulent final Judgment of May 29, 2019 fraudulently stating that the Sham Trial of April 16, 2019 was held on April 23, 2019, extorting U.S. citizen Charles Tavares of properties and rights, and entering a Sham Injunction to deprive and extort, under color of law, Tavares’ properties and rights, false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, systematically corrupting and subverting courts of law, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Charles Tavares’ properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 265** – Reckless corrupt Judge Carlos M. Guzman (Florida Bar No. 115.990), Miami Courts, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices to deprive Tavares of rights and properties upon sham proceedings and fraudulent invalid orders to extort Tavares, further, knowingly and intentionally subverting Florida courts to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services, in violation of, §817.155, F.S. (Fraudulent Practices).

<sup>123</sup> [Fernando Menendez Montes](#) (“Montes”), is a former sham straw man from the Republic of Panamá, used for many years by hundreds of [bad domestic and foreign actors](#) and reckless law firms systematically perpetrating tax frauds and money laundering of illicit monetary instruments through the United States of America. BRIDGELoan’s CCE’s Associates, *inter alia*, criminals [Gabriela Maranhao Machado Guimaraes](#) (“Guimaraes”), and [Marco Emilio Rojas](#) (“Rojas”) (Florida Bar No. 940.453), now systematically, to further schemes in the United States of America, simply forge and copy/paste Montes’ old signatures to fabricate fraudulent documents used in the schemes, avoiding liability for their crimes – as Rojas, *et al.*, systematically did with their law offices’ cleaners for years, easily defrauding U.S. citizens, the State of Florida, and the United States of America.

**Count 266** – Reckless corrupt Judge Carlos Manuel Guzman (“Judge Guzman”) (Florida Bar No. 115.990), did knowingly and intentionally, improperly use their judicial powers as guise to commit crimes, willfully participating in a brazen known criminal scheme, by, *inter alia*, presiding a **Kangaroo Court**, to, knowingly and intentionally deprive and extort U.S. citizen Charles Tavares’ (“Tavares”) in sham proceedings, entering a sham Order for Trial to deprive and extort Tavares of properties and rights, holding an improperly set and noticed sham Trial of April 16, 2019 to extort Tavares, entering a facially fraudulent and invalid Sham Final Judgment on May 29, 2019, fraudulently stating, because of brazen violations of law, legal precedents, and due process of law, that the Sham Trial of April 16, 2019 was held on April 23, 2019, knowingly and intentionally furthering the systematic subversion of Florida Courts by, among others, BRIDGELOAN’S CCE’S Associates, systematically depriving, extorting Tavares of all properties, and violating, under color of law, Tavares’ constitutionally guaranteed rights and due process of law, further depriving the State of Florida, and the United States of America, of honest services upon courts of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.



**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
267	April 7, 2021	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Steven Carlyle Cronig Hinshaw & Culbertson, LLP
268		§ 241 Conspiracy Against Rights &	Gabriela M. Machado Guimaraes Fernando Menendez Montes
269		§ 1346 Scheme/Artifice to Defraud &	Marco Emilio Rojas Peter Francis Valori
270		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	Nelson Slosbergas Francisco Alfonso Mesa Schuler Tax House, LLC
271		§ 1341 Mail Fraud &	Hugo Barreto Del Priore Ernesto Pereira Lopes
272		§ 1961 <i>et seq.</i> – RICO &	Rubens Menin Teixeira de Souza AHS Residential a.k.a. RESIA, LLC
273		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Joseph Horn Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On April 7, 2021, corrupt and reckless attorney Steven Carlyle Cronig<sup>124</sup> (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), and Hinshaw & Culbertson, LLP (“Hinshaw”), at all relevant times, conspiring with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise<sup>125</sup> (“Criminal Enterprise” or “CCE”), transmit, with unclean hands, Via U.S. Certified Mail, a certain [invalid & fraudulent Corporate Resolutions](#) (“Hinshaw’s Sham Resolutions”) of Charles Tavares’ (“Tavares”) company, 139TH Avenue SW 8 Street, LLC (“139 TH”), furthering continued schemes extorting Tavares of all properties and rights, under color of law, upon subverted proceedings in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) – and in eight (08) Related Cases. See [Tavares’ Affidavit](#). Hinshaw’s Sham Resolutions, show, *inter alia*, fabricated signatures of a certain former sham straw man in the Republic of Panamá, Fernando Menendez Montes (“Montes”), that the CCE’s Associates continue to use to avoid justice, by simply copying and pasting Montes’ previous signatures to fabricate false, invalid and fraudulent documents, *inter alia*, Hinshaw’s Sham Resolutions, appointing criminals Marco E. Rojas and Gabriela Machado Guimaraes as Vice-Presidents of 139 TH. Cronig, Hinshaw, *et al.*, further engage in fraudulent monetary transactions with Tavares’ 139 TH’s 29 Acres Property (the “Property”), and without proper notice to Tavares, at all times a Shareholder of 139 TH, demand a sham capital call in the sum of \$159,548.68, furthering the successful scheme extorting Tavares of properties and rights.<sup>126</sup>

<sup>124</sup> Since at least 2015, corrupt Cronig and Hinshaw have been implicated in the CCE’s underlying schemes to deprive and extort Tavares of all properties and rights, and at all relevant times, Cronig, Hinshaw, and other Perpetrators implicated, all know that Tavares is the sole 52% majority interest holder of Tavares’ 139 TH, and the sole legal authority of 139 TH since Tavares founded Tavares’ 139 TH in 2003.

<sup>125</sup> [BRIDGELOAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>126</sup> On August 30, 2018, BRIDGELOAN’s CCE, through Associates Nelson Slosbergas, Marco Emilio Rojas, Gabriela Machado Guimaraes, Peter F. Valori, *et al.*, hijack Tavares’ 139 TH with fabricated evidence, causing subverted Miami Courts to deprive Tavares of Properties and rights.

## COUNTS

**Count 267** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 268** - 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 property, and rights due process of law, to proper legal representation free from intimidation, harassment, and extortion of properties and rights upon a court of law in the United States, in violation of, among other things, 18 U.S.C. §241. *See, e.g.,* U.S. Const., Amend. XIV.

**Count 269** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using Electronic Wires to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 270** – At all times relevant, reckless attorney Steven Carlyle Cronig (“Cronig”), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction of U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely deal and steal the Properties in violation of, Title 18 U.S.C., § 1957.

**Count 271** – Reckless attorney Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), at 2525 Ponce de Leon Blvd., Fourth Floor, Coral Gables, FL 33134, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares (“Tavares”), and Tavares’ 139TH Avenue SW 8 Street, LLC (“139 TH”), of properties and rights (“Property”), under color of law, the transmission, Via U.S. Certified Mail, of certain false, invalid, and fraudulent correspondence, dated April 7, 2021, pertaining to sham resolutions of Tavares’ 139 TH, containing among other things, Sham Resolutions of 139 TH, fabricated by Cronig, Hinshaw, *et al.*, with forged signatures purportedly from straw man Fernando Menendez Montes (“Montes”), a bad actor in the Republic of Panamá without any authority whatsoever over Tavares’ 139 TH, see, *e.g.*, among ten (10) violations of Mail Fraud; From Cronig at Hinshaw to: **(i)** IBAC Asset Holders, Inc., Charles Tavares, Director, at 245 SE First Street, Suite 221, Maimi, FL 33131 by Certified U.S. Mail #7020 1290 0000 7000 0291; and **(ii)** to San Isidro of Florida, Inc., Charles Tavares, Director at 245 SE First Street, Miami, FL 33131, via Certified U.S. Mail #7020 1290 0000 7000 0284, in violation of, Title 18, U.S.C., § 1341 (Mail Fraud).

**Count 272** - At all times relevant, reckless attorney Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”) and other Perpetrators implicated, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, FL, 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, fabricating and filing false documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, fraudulent transfer of Properties, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, bribery of officers of the court to further a scheme depriving and extorting Tavares of properties and rights upon sham proceedings in a court of law in the United States, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, [Tavares Sworn Affidavit](#).

**Count 273** – Reckless attorney Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”) and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, *inter alia*, dealing with Charles Tavares’ (“Tavares”) stolen properties, and money laundering its ill-gotten proceeds, to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares to further a scheme upon the Miami Courts, systematically depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
274	<b>May 4, 2022</b>	<b>U. S. CODE TITLE 18</b>	Steven Carlyle Cronig Hinshaw & Culbertson, LLP Gabriela M. Machado Guimaraes Fernando Menendez Montes Marco Emilio Rojas Peter Francis Valori Nelson Slosbergas Hugo Barreto Del Priore Ernesto Pereira Lopes AHS Residential a.k.a. RESIA, LLC Bridgeloan Investors, Inc. Nelson Varona Sr. NV Sand Group, Inc., a Fla. Corp. Your Home Realty Group, Inc. Daniel J. Marzano First American Title Insurance Co. Lee S. Katsikos The Continued Criminal Enterprise
275		§ 371 Conspiracy to Defraud the USA &	
276		§ 241 Conspiracy Against Rights &	
277		§ 1346 Scheme/Artifice to Defraud &	
278		§ 1341 Mail Fraud &	
279		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	
280		§ 1956 Laundering of Monetary Instruments &	
281		§ 1961 <i>et seq.</i> – RICO & <b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	

On May 4, 2022, corrupt and reckless attorney Steven Carlyle Cronig<sup>127</sup> (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), and Hinshaw & Culbertson, LLP (“Hinshaw”), at all relevant times, conspiring with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise<sup>128</sup> (“Criminal Enterprise” or “CCE”), transmit, with unclean hands, Via U.S. Mail, a certain [Sham Letter](#) stating the CCE has sold, on May 3, 2022, Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) Properties, furthering continued schemes extorting Tavares of all properties and rights, under color of law, upon subverted proceedings in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11<sup>th</sup> Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) – and in eight (08) Related Cases. See [Tavares’ Affidavit](#). At all relevant times, Cronig, Hinshaw, and other Perpetrators implicated know that they are dealing with stolen properties, obtained by unlawful means, *inter alia*, from coercion, intimidation, extortion, fabrication of false, invalid and fraudulent indicia of membership interest of Tavares’ 139 TH, and the sham sale and transfer<sup>129</sup> of Tavares’ 139 TH’s 29 Acres Property (“[Sham Transfer 1](#)”), is an artifice to money launder the proceeds, and to prevent justice.

<sup>127</sup> Since at least 2015, corrupt Cronig and Hinshaw have been implicated in the CCE’s underlying schemes to deprive and extort Tavares of all properties and rights, and at all relevant times, Cronig, Hinshaw, and other Perpetrators implicated, all know that Tavares is the sole 52% majority interest holder of Tavares’ 139 TH, and the sole legal authority of 139 TH since Tavares founded Tavares’ 139 TH in 2003.

<sup>128</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>129</sup> The [Sham Transfer 1](#), recorded with the [Clerk of Courts](#), on May 18, 2022 at 11:28 a.m., see [CFN 2022R0402953](#), showing a sale on May 3, **2020**, to NV Sand Group, Inc., a Florida corp. (“Varona”), in the amount of \$15,125,000, simultaneously recorded with a [Second Sham Transfer 2](#), from Varona to 137 TH AVE 8 ST, Holdings, LLC, and followed by [Sham Transfer 3](#), and [Sham Transfer 4](#), showing artifices to fraudulently cover up the scheme, and money launder ill-gotten proceeds. Tavares’ 139 TH’s Property was not publicly marketed by the CCE. See Record.

## COUNTS

**Count 274** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 275** - 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 property, and rights due process of law, to proper legal representation free from intimidation, harassment, and extortion of properties and rights upon a court of law in the United States, in violation of, among other things, 18 U.S.C. §241. *See, e.g.,* U.S. Const., Amend. XIV.

**Count 276** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using Electronic Wires to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 277** – Reckless attorney Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), at 2525 Ponce de Leon Blvd., Fourth Floor, Coral Gables, FL 33134, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares (“Tavares”), and Tavares’ 139TH Avenue SW 8 Street, LLC (“139 TH”), of properties and rights, under color of law, the transmission, [Via U.S. Mail](#), of certain false, invalid, and [fraudulent correspondence dated Mail 4, 2022](#), pertaining to a false, invalid and fraudulent Transfer and Sale of Tavares’ 139 TH’s Properties and rights (“Property”) (“[Sham Transfer 1](#)”) to NV Sand Group, Inc., containing among other things, a fraudulent Settlement Statement (Form HUD-1), fabricated by Cronig, Hinshaw, *et al.*, and signed by criminal Gabriela Maranhao Machado Guimaraes, with invalid and fraudulent authority of 139 TH, predicated on fabricated indicia of membership interest, and forged – copy/paste signatures, purportedly from former straw man Fernando Menendez Montes (“Montes”), a bad actor in the Republic of Panamá without any authority whatsoever over Tavares’ 139 TH. The Sham documents is transmitted by Cronig at Hinshaw to: **(i)** IBAC Asset Holders, Inc., Charles Tavares President, at 245 SE First Street, Suite 221, Maimi, FL 33131, in violation of, Title 18, U.S.C., § 1341 (Mail Fraud).

**Count 278** – At all times relevant, reckless attorney Steven Carlyle Cronig (“Cronig”), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely deal and steal the Properties in violation of, Title 18 U.S.C., § 1957.

**Count 279** – At all times relevant, reckless attorney Steven Carlyle Cronig (“Cronig”), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely deal and steal the Properties and money launder the proceeds,<sup>130</sup> in violation of, Title 18 U.S.C., § 1956.

**Count 280** - At all times relevant, reckless attorney Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”) and other Perpetrators implicated, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, FL, 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, fabricating and filing false documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, fraudulent transfer of Properties, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, bribery of officers of the court to further a scheme depriving and extorting Tavares of properties and rights upon sham proceedings in a court of law in the United States, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, [Tavares Sworn Affidavit](#).

**Count 281**– Reckless attorney Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”) and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, *inter alia*, dealing with Charles Tavares’ (“Tavares”) stolen properties, and money laundering its ill-gotten proceeds, to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares to further a scheme upon the Miami Courts, systematically depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

<sup>130</sup> See, Hinshaw’s Fraudulent Transfer and Sale of Tavares’ 139 TH’s 29 Acres to NV Sand Group, Inc., a Florida corp. (“NV Sand”) (FEI# 87-1122591) presided by Nelson Varona, Sr. (“Varona”), on May 3, 2022, for \$15,125,000.00, and net sales proceeds were \$13,999,158.45, and that, accordingly, Tavares’ proceeds will be \$737,021, despite Tavares having a 52% interest on 139 TH. Cronig attaches to his letter, a bogus Settlement Statement (“HUD-1”) (File # CLGL-122) form with five pages showing criminal Guimaraes signing on for seller 139 TH on May 2, 2022 and no signature for Varona’s NV Sand. The HUD-1 form shows that 139 TH paid a total of \$907,500.00 (Nine Hundred Seven Thousand Five Hundred Dollars) in commissions to brokers The Katsikos Group, Inc., a Florida corp. (FEI#20-3165923) presided by Lee S. Katsikos (jointly “Katsikos”) receiving \$453,750.00, and “Your Commercial Realty Group”<sup>27</sup> also receiving \$453,750.00. The settlement agent is CM Law Group, LLC a.k.a. Coscolluela & Marzano, P.A. with attorneys Michael Coscolluela (“Coscolluela”) (Fla. Bar No. 189.480) and Daniel J. Marzano (“Marzano”) (Fla. Bar No.189.804) as agents for First American Title Insurance Company a.k.a First American Financial Corporation (“First American”) (stock symbol NYSE “FAF”) charging \$36,575.00 for the owner’s Title Insurance Policy, and charging 139 TH \$400.00 for “Title Search Fee to First American.” The United States’ HUD-1 Form also shows charges to 139 TH for “City/ County Tax/Stamps Deed” in the amount of \$68,062.50 and “State Tax/ Stamps deed mortgage \$90,750.00. The HUD-1 also shows 139 TH paying “Lien Letters to One-Step Lien Search LLC (FEI #65-11 36977) in the amount of \$798.00 (Seven Hundred Ninety Eight Dollars), and “legal fees” paid to Hinshaw Law in the amount of \$50,000.00 to participate in the brazen scheme extorting and depriving Tavares of properties and rights, and the State of Florida, and the United States of America. See [Sham Transfer 1](#).



**COUNT** **APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

282	<b>May 18, 2022 at 11:28:31 AM</b>	<b>U. S. CODE TITLE 18</b>	Steven Carlyle Cronig Hinshaw & Culbertson, LLP <a href="#">Grove Bank &amp; Trust</a>
283		§ 371 Conspiracy to Defraud the USA &	Gabriela M. Machado Guimaraes Fernando Menendez Montes
284		§ 241 Conspiracy Against Rights &	Marco Emilio Rojas Peter Francis Valori
285		§ 1346 Scheme/Artifice to Defraud &	Nelson Slosbergas Hugo Barreto Del Priore
286		§ 1343 Wire Fraud &	AHS Residential a.k.a. RESIA, LLC Bridgeloan Investors, Inc. Nelson Varona Sr.
287		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	NV Sand Group, Inc., a Fla. Corp. Your Home Realty Group, Inc.
288		§ 1956 Laundering of Monetary Instruments &	Daniel J. Marzano First American Title Insurance Co.
289		§ 1961 <i>et seq.</i> – RICO & <b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Lee S. Katsikos The Continued Criminal Enterprise

On May 18, 2022, shameless criminal Steven Carlyle Cronig (Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), and Hinshaw & Culbertson, LLP (“Hinshaw”), at all relevant times, conspiring with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Criminal Enterprise<sup>131</sup> (“Criminal Enterprise” or “CCE”), to further an underlying scheme depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, cause to be filed, with unclean hands, with the Clerk of the Courts, the [First Sham](#) Special Warranty Deed of Tavares’ 139 TH Avenue SW 8 Street, LLC’s (“139 TH”) 29 Acres Properties (“Property”) (“[Sham Transfer 1](#)”), see [Record](#) at [CFN#2022R0402953](#), selling and transferring Tavares’ 139 TH’s Property to Nelson Varona Sr.’s NV Sand Group, Inc., a Florida corp. (“Varona”) (Tax Id.# 87-1122591) for \$15, 125,000, fraudulently dating the day of the transfer on the Special Warranty Deed **May 3, 2020**. Simultaneously, back-to-back, criminal Cronig, *et al.*, records another fraudulent Warranty Deed from Varona’s NV Sand Group, Inc. to Rodolfo Alvarez and Maria Gonzalez’s 137 TH AVE 8 TH ST Holdings, LLC, a Florida L.L.C. (“137 Holdings”) (Tax Id. #88-12 78066) for \$100 (“[Sham Transfer 2](#)”), see [CFN#2022R0402954](#). The Sham Transfer 1 & Sham Transfer 2, is another artifice by the CCE to, *inter alia*, blur the record, money launder, and tax evade the ill-gotten proceeds from underlying schemes in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11th Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) – and in eight (08) Related Cases. See [Tavares’ Affidavit](#). At all relevant times, Cronig, Hinshaw, and other Perpetrators implicated know that they are dealing with stolen properties, obtained by unlawful means, *inter alia*, from Tavares’ extortion, under color of law, in subverting proceedings, further depriving the United States of honest services.

<sup>131</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

## COUNTS

**Count 282** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 283** - 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 property, and rights due process of law, to proper legal representation free from intimidation, harassment, and extortion of properties and rights upon a court of law in the United States, in violation of, among other things, Title 18 U.S.C. §241.

**Count 284** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using Electronic Wires to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 285** – Shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), at 2525 Ponce de Leon Blvd., Fourth Floor, Coral Gables, FL 33134, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares (“Tavares”), and Tavares’ 139TH Avenue SW 8 Street, LLC (“139 TH”), of properties and rights, under color of law, the transmission through electronic wire, of millions of dollars from the false, invalid and fraudulent transfer and sale of Tavares’ 139 TH’s Properties and rights, for \$15,125,000, (“[Sham Transfer 1](#)”) to NV Sand Group, Inc., containing among other things, a fraudulent Settlement Statement (Form HUD-1), fabricated by Cronig, Hinshaw, *et al.*, and signed by criminal Gabriela Machado Guimaraes, with invalid and fraudulent authority of 139 TH, predicated on fabricated indicia of membership interest, and forged – copy/paste signatures, purportedly from former straw man Fernando Menendez Montes (“Montes”), a bad actor in the Republic of Panamá without any authority whatsoever over Tavares’ 139 TH, further defrauding the United States of America, in violation of, Title 18, U.S.C., § 1343 (Wire Fraud).

**Count 286** – At all times relevant, shameless criminals Steven Carlyle Cronig (“Cronig”), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a fraudulent monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely and fraudulently deal and steal the Properties, in violation of, Title 18 U.S.C., § 1957.

**Count 287** – At all times relevant, shameless criminal Steven Carlyle Cronig (“Cronig”), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely deal and steal the Properties and money launder the ill-gotten proceeds,<sup>132</sup> in violation of, Title 18 U.S.C., § 1956.

**Count 288** - At all times relevant, shameless criminal Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”) and other Perpetrators implicated, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, FL, 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, fabricating and filing false documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, fraudulent transfer of Properties, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, bribery of officers of the court to further a scheme depriving and extorting Tavares of properties and rights upon sham proceedings in a court of law in the United States, and systematic violations of rights, contrary to Title 18 U.S.C. §1961 *et seq.* See, [Tavares Sworn Affidavit](#).

**Count 289** – Shameless criminal Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, dealing with Charles Tavares’ (“Tavares”) stolen properties, and money laundering its ill-gotten proceeds, to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares to further a scheme upon the Miami Courts, systematically depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

<sup>132</sup> See, Hinshaw’s Fraudulent Transfer and Sale of Tavares’ 139 TH’s 29 Acres to NV Sand Group, Inc., a Florida corp. (“NV Sand”) (FEI# 87-1122591) presided by Nelson Varona, Sr. (“Varona”), on May 3, 2022, for \$15,125,000.00, and net sales proceeds were \$13,999,158.45, and that, accordingly, Tavares’ proceeds will be \$737,021, despite Tavares having a 52% interest on 139 TH. Cronig attaches to his letter, a bogus Settlement Statement (“HUD-1”) (File # CLGL-122) form with five pages showing criminal Guimaraes signing on for seller 139 TH on May 2, 2022 and no signature for Varona’s NV Sand. The HUD-1 form shows that 139 TH paid a total of \$907,500.00 (Nine Hundred Seven Thousand Five Hundred Dollars) in commissions to brokers The Katsikos Group, Inc., a Florida corp. (FEI#20-3165923) presided by Lee S. Katsikos (jointly “Katsikos”) receiving \$453,750.00, and “Your Commercial Realty Group”<sup>27</sup> also receiving \$453,750.00. The settlement agent is CM Law Group, LLC a.k.a. Cosculluela & Marzano, P.A. with attorneys Michael Cosculluela (“Cosculluela”) (Fla. Bar No. 189.480) and Daniel J. Marzano (“Marzano”) (Fla. Bar No.189.804) as agents for First American Title Insurance Company a.k.a First American Financial Corporation (“First American”) (stock symbol NYSE “FAF”) charging \$36,575.00 for the owner’s Title Insurance Policy, and charging 139 TH \$400.00 for “Title Search Fee to First American.” The United States’ HUD-1 Form also shows charges to 139 TH for “City/ County Tax/Stamps Deed” in the amount of \$68,062.50 and “State Tax/ Stamps deed mortgage \$90,750.00. The HUD-1 also shows 139 TH paying “Lien Letters to One-Step Lien Search LLC (FEI #65-11 36977) in the amount of \$798.00 (Seven Hundred Ninety Eight Dollars), and “legal fees” paid to Hinshaw Law in the amount of \$50,000.00 to participate in the brazen scheme extorting and depriving Tavares of properties and rights, and the State of Florida, and the United States of America. See [Sham Transfer 1](#).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
290	<b>May 18, 2022 at 11:28:31 AM</b>	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Daniel Joseph Marzano Coscolluela & Marzano, P.A. Nelson Varona Sr.
291		§ 241 Conspiracy Against Rights &	NV Sand Group, Inc., a Fla. Corp. Rodolfo Alvarez
292		§ 1346 Scheme/Artifice to Defraud &	Maria Gonzalez 137 TH AVE 8TH ST Holdings, LLC
293		§ 1343 Wire Fraud &	Steven Carlyle Cronig Hinshaw & Culbertson, LLP
294		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	Gabriela M. Machado Guimaraes Fernando Menendez Montes
295		§ 1956 Laundering of Monetary Instruments &	Marco Emilio Rojas Nelson Slosbergas
296		§ 1961 <i>et seq.</i> – RICO &	Ernesto Pereira Lopes AHS Residential a.k.a. RESIA, LLC
297		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc. First American Title Insurance Co. The Continued Criminal Enterprise

On May 18, 2022, reckless attorney Daniel J. Marzano (“Marzano”) (Florida Bar No. 189.804), and other Perpetrators implicated, at all relevant times, conspiring with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise’s<sup>133</sup> (“Criminal Enterprise” or “CCE”), Associates to further an underlying scheme extorting U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, cause to be filed, with unclean hands, with the Clerk of the Courts, a Second Sham Warranty Deed for Tavares’ 139 TH Avenue SW 8 Street, LLC’s (“139 TH”) 29 Acres Properties (“Property”), from<sup>134</sup> Nelson Varona Sr.’s NV Sand Group, Inc., a Florida corp. (“Varona”) (Tax Id. #87 1122591) to Rodolfo Alvarez and Maria Gonzalez’s 137 TH AVE 8 TH ST Holdings, LLC, a Florida L.L.C. (“137 Holdings”) (Tax Id. #88-12 78066) for \$100 (“[Sham Transfer 2](#)”), see Clerk Records at [CFN#2022R0402954](#). At all relevant times, Marzano, and other Perpetrators Implicated, know that they are engaging in monetary transactions in property derived from specified unlawful activity, and are furthering artifices to money launder and tax evade ill-gotten proceeds from Tavares’ 139 TH’s Property from underlying schemes in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11th Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) – and in eight (08) Related Cases. See [Tavares’ Affidavit](#). The record shows Marzano, and other Perpetrators Implicated, conscious of guilt, knowingly and intentionally, fabricating and causing to be filed and recorded with the Clerk of the Court in Miami-Dade County, Florida, patently facially contradictory and fraudulent Deeds furthering schemes.

<sup>133</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>134</sup> Marzano, *et al.*, cause two (02) fraudulent Deeds of Tavares 139 TH’s Properties to be recorded simultaneously on May 18, 2022, see, [Sham Transfer 1](#) & [Sham Transfer 2](#), to blur the record, and further money launder and tax evade the ill-gotten proceeds from the scheme extorting Tavares, under color of law, upon sham proceedings in the Miami Courts, further depriving the United States of honest services.

## COUNTS

**Count 290** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 291** - 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 property, and rights due process of law, to proper legal representation free from intimidation, harassment, and extortion of properties and rights upon a court of law in the United States, in violation of, among other things, Title 18 U.S.C. §241.

**Count 292** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using Electronic Wires to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 293** – Reckless attorney Daniel Joseph Marzano (“Marzano”) (Florida Bar No. 189.804), Cosculluela & Marzano, P.A., and other Perpetrators implicated, did knowingly and intentionally, use electronic wire, as an artifice to further a brazen criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares (“Tavares”), and Tavares’ 139TH Avenue SW 8 Street, LLC (“139 TH”), of properties and rights, under color of law, relating to a certain false, invalid, and fraudulent transfer and sale, for \$100, of Tavares’ 139 TH’s 29 Acres Properties and rights (“Property”), from Nelson Varona Sr.’s NV Sand Group, Inc., a Florida corp. (“Varona”) to Rodolfo Alvarez and Maria Gonzalez’s 137 AVE 8TH ST Holdings, LLC, a Florida L.L.C. (“137 Holdings”) (Tax Id. #88-1378066) (“[Sham Transfer 2](#)”), recorded with the Clerk of the Court in Miami-Dade County, Florida, on May 18, 2022 at 11:28:31 AM, and the patently fraudulent sham Warranty Deed dated May 3, 2022, see Clerk’s Record at CFN #2022R0402954, furthering criminals schemes defrauding Tavares of properties and rights, and depriving the State of Florida and the United States of America of honest services upon courts of law in the United States of America, in violation of, Title 18, U.S.C., § 1343 (Wire Fraud).

**Count 294** – At all times relevant, reckless attorney Daniel Joseph Marzano (“Marzano”) (Florida Bar No. 189.804), Cosculluela & Marzano, P.A., and other Perpetrators implicated, knew, and had to know that they were all engaging in a fraudulent monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely and fraudulently deal and steal the Properties, in violation of, Title 18 U.S.C., § 1957.



**Count 295** – At all times relevant, reckless attorney Daniel Joseph Marzano (“Marzano”) (Florida Bar No. 189.804), Cosculluela & Marzano, P.A., and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely deal and steal the Properties and money launder the ill-gotten proceeds,<sup>135</sup> in violation of, Title 18 U.S.C., § 1956.

**Count 296** - At all times relevant, reckless attorney Daniel Joseph Marzano (“Marzano”) (Florida Bar No. 189.804), Cosculluela & Marzano, P.A., and other Perpetrators implicated, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, FL, 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, fabricating and filing false documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, fraudulent transfer of Properties, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, bribery of officers of the court to further a scheme depriving and extorting Tavares of properties and rights upon sham proceedings in a court of law in the United States, and systematic violations of rights, contrary to Title 18 U.S.C. §1961 *et seq.* See, [Tavares Sworn Affidavit](#).

**Count 297**– Shameless criminal Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”) and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, dealing with Charles Tavares’ (“Tavares”) stolen properties, and money laundering its ill-gotten proceeds, to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares to further a scheme upon the Miami Courts, systematically depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

<sup>135</sup> See, Hinshaw’s Fraudulent Transfer and Sale of Tavares’ 139 TH’s 29 Acres to NV Sand Group, Inc., a Florida corp. (“NV Sand”) (FEI# 87-1122591) presided by Nelson Varona, Sr. (“Varona”), on May 3, 2022, for \$15,125,000.00, and net sales proceeds were \$13,999,158.45, and that, accordingly, Tavares’ proceeds will be \$737,021, despite Tavares having a 52% interest on 139 TH. Cronig attaches to his letter, a bogus Settlement Statement (“HUD-1”) (File # CLGL-122) form with five pages showing criminal Guimaraes signing on for seller 139 TH on May 2, 2022 and no signature for Varona’s NV Sand. The HUD-1 form shows that 139 TH paid a total of \$907,500.00 in commissions to brokers The Katsikos Group, Inc., a Florida corp. (FEI#20-3165923) presided by Lee S. Katsikos (jointly “Katsikos”) receiving \$453,750.00, and “Your Commercial Realty Group”<sup>27</sup> also receiving \$453,750.00. The settlement agent is CM Law Group, LLC a.k.a. Cosculluela & Marzano, P.A. with attorneys Michael Cosculluela (“Cosculluela”) (Fla. Bar No. 189.480) and Daniel J. Marzano (“Marzano”) (Fla. Bar No.189.804) as agents for First American Title Insurance Company a.k.a First American Financial Corporation (“First American”) (stock symbol NYSE “FAF”) charging \$36,575.00 for the owner’s Title Insurance Policy, and charging 139 TH \$400.00 for “Title Search Fee to First American.” The United States’ HUD-1 Form also shows charges to 139 TH for “City/ County Tax/Stamps Deed” in the amount of \$68,062.50 and “State Tax/ Stamps deed mortgage \$90,750.00. The HUD-1 also shows 139 TH paying “Lien Letters to One-Step Lien Search LLC (FEI #65-11 36977) in the amount of \$798.00 (Seven Hundred Ninety Eight Dollars), and “legal fees” paid to Hinshaw Law in the amount of \$50,000.00 to participate in the brazen scheme extorting and depriving Tavares of properties and rights, and the State of Florida, and the United States. See [Sham Transfer 1](#).



**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

298	<p><b>June 23, 2022 at 11:26 AM</b></p>	<p><b><u>U. S. CODE TITLE 18</u></b> § 371 Conspiracy to Defraud the USA &amp;</p>	<p>Steven Carlyle Cronig Hinshaw &amp; Culbertson, LLP <a href="#">Grove Bank &amp; Trust</a></p>
299		<p>§ 241 Conspiracy Against Rights &amp;</p>	<p>Gabriela M. Machado Guimaraes Fernando Menendez Montes</p>
300		<p>§ 1346 Scheme/Artifice to Defraud &amp;</p>	<p>Marco Emilio Rojas Peter Francis Valori</p>
301		<p>§ 1343 Wire Fraud &amp;</p>	<p>Nelson Slosbergas Hugo Barreto Del Priore</p>
302		<p>§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &amp;</p>	<p>AHS Residential a.k.a. RESIA, LLC Bridgeloan Investors, Inc. Nelson Varona Sr.</p>
303		<p>§ 1956 Laundering of Monetary Instruments &amp;</p>	<p>NV Sand Group, Inc., a Fla. Corp. Your Home Realty Group, Inc.</p>
304		<p>§ 1961 <i>et seq.</i> – RICO &amp;</p>	<p>Daniel J. Marzano First American Title Insurance Co.</p>
305		<p><b><u>FLORIDA STATUTES</u></b> Title XLVI § 817.155 Fraudulent Practices</p>	<p>Lee S. Katsikos The Continued Criminal Enterprise</p>

On June 23, 2022, shameless criminal Steven Carlyle Cronig (Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), at all relevant times, conspiring with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Criminal Enterprise<sup>136</sup> (“Criminal Enterprise” or “CCE”), to further an underlying scheme extorting U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, cause to be filed, with unclean hands, with the [Clerk of the Courts](#), a **Third Sham** Special Warranty Deed for Tavares’ 139 TH Avenue SW 8 Street, LLC’s (“139 TH”) Properties (“Property”) (“**Sham Transfer 3**”), see, [CFN #2022R0508565](#), transferring Tavares’ 139 TH’s Property to Nelson Varona Sr.’s NV Sand Group, Inc., a Florida corp. (“Varona”) (Tax Id.# 87-1122591) for \$0 (Zero dollars), again, fraudulently dating the day of the transfer on the forged *Special Warranty Deed* **May 3, 2020**, to, *inter alia*, blur the record to cover up schemes, money launder, and tax evade the ill-gotten proceeds from underlying schemes in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11th Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) – and in eight (08) Related Cases. See [Tavares’ Affidavit](#). See also, Hinshaw’s fraudulent recorded, back-to-back, on May 18, 2022, Sham **Transfer 1** at CFN #2022R0402953, and **Sham Transfer 2**, at CFN #2022R0402954. At all relevant times, Cronig, Hinshaw, and other Perpetrators implicated know that they are furthering criminal schemes, and dealing with stolen properties, obtained by unlawful means, *inter alia*, from Tavares’ extortion, under color of law, in subverting proceedings, further depriving the United States of America of honest services. Despite Tavares’ repeated formal demands to Hinshaw, *et al.*, to stop the schemes and return Tavares’ Property and rights, the shameless criminals continue the schemes, and prevent justice.

<sup>136</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

## COUNTS

**Count 298** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 299** - 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 property, and rights due process of law, to proper legal representation free from intimidation, harassment, and extortion of properties and rights upon a court of law in the United States, in violation of, among other things, Title 18 U.S.C. §241. See, e.g., U.S. Const., Amend. XIV.

**Count 300** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using Electronic Wires to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 301** – Shameless criminal Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), at 2525 Ponce de Leon Blvd., Fourth Floor, Coral Gables, FL 33134, and other Perpetrators implicated, did knowingly and intentionally, use electronic wires, as an artifice to further their criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares (“Tavares”), and Tavares’ 139TH Avenue SW 8 Street, LLC (“139 TH”), of properties and rights, under color of law, relating to a certain false, invalid, and fraudulent sham special Warranty Deed, **falsely dated May 3, 2020**, and recorded with the Clerk of the Courts in Miami-Dade County, Florida, on June 23, 2022 at 11:26 AM, fraudulently transferring U.S. citizen Charles Tavares (“Tavares”) 139 TH Avenue SW 8 Street, LLC’s (139 TH) Properties and rights (“Property”) from “139th Avenue S.W. Eighth Street, LLC, a Florida Limited liability company” to NV Sand Group, Inc., a Florida corp., and further falsely stating that, *inter alia*, “*This Special Warranty is being re-recorded in order to pay the Surtax on the Deed which was not collected at the time of original recording on 5/18/2022, in ORB 33192, Page 3521, Miami-Dade County, FL*”, see [Sham Transfer 3](#) at CFN #2022R0508565, when in truth and in fact, Cronig and Hinshaw know that they are recording the patently facially Third fraudulent *Special Warranty Deed* to, *inter alia*, blur the record, money launder and tax evade the ill gotten proceeds extorted from Tavares, in violation of, Title 18, U.S.C., § 1343 (Wire Fraud).

**Count 302** – At all times relevant, shameless criminal Steven Carlyle Cronig (“Cronig”), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knew, and had to know that they were all Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, *inter alia*, U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”),

systematically depriving and extorting Tavares and Tavares' 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares' 139 TH, allowing the Perpetrators to falsely and fraudulently deal and steal the Properties, in violation of, Title 18 U.S.C., § 1957.

**Count 303** – At all times relevant, shameless criminal Steven Carlyle Cronig (“Cronig”), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely deal and steal the Properties and money launder the ill-gotten proceeds, in violation of, Title 18 U.S.C., § 1956.

**Count 304** - At all times relevant, shameless criminal Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”) and other Perpetrators implicated, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, FL, 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, fabricating and filing false documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, fraudulent transfer of Properties, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, bribery of officers of the court to further a scheme depriving and extorting Tavares of properties and rights upon sham proceedings in a court of law in the United States, and systematic violations of rights, contrary to Title 18 U.S.C. §1961 *et seq.* See, [Tavares Sworn Affidavit](#).

**Count 305**– Shameless criminal Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, dealing with Charles Tavares’ (“Tavares”) stolen properties, and money laundering its ill-gotten proceeds, to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares to further a scheme upon the Miami Courts, systematically depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

306	<b>July 19, 2022</b>	<b><u>U. S. CODE TITLE 18</u></b>	<b><u>Grove Bank &amp; Trust</u> Steven Carlyle Cronig Hinshaw &amp; Culbertson, LLP Gabriela M. Machado Guimaraes Fernando Menendez Montes Marco Emilio Rojas R&amp;S International Law Gorup Peter Francis Valori Damian &amp; Valori, LLP Nelson Slosbergas NS Corporate Services, Inc. Hugo Barreto Del Priore Ernesto Pereira Lopes AHS Residential a.k.a. RESIA, LLC Bridgeloan Investors, Inc. The Continued Criminal Enterprise</b>
307		§ 371 Conspiracy to Defraud the USA &	
308		§ 241 Conspiracy Against Rights &	
309		§ 1346 Scheme/Artifice to Defraud &	
310		§ 1343 Wire Fraud &	
311		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	
312		§ 1956 Laundering of Monetary Instruments &	
313		§ 1961 <i>et seq.</i> – RICO &	
		<b><u>FLORIDA STATUTES</u></b>	
		Title XLVI § 817.155 Fraudulent Practices	

On July 19, 2022, shameless criminals Steven Carlyle Cronig (Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), and Hinshaw & Culbertson, LLP (“Hinshaw”), at all relevant times, conspiring with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Criminal Enterprise<sup>137</sup> (“Criminal Enterprise” or “CCE”), to further an underlying scheme extorting U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, cause, with unclean hands, Grove Bank & Trust (“Grove Bank”) (Tax ID. 59-0199400) ([www.grovebankandtrust.com](http://www.grovebankandtrust.com)), to issue sham financial instruments, *see, e.g.*, a sham [Grove Bank Cashier’s Check No. 6054](#) , showing remitter Hinshaw & Culbertson, LLP IOTA Trust Account Real Estate – Re: Our Matter# 1049001 – 139 AVE SW 8 TH ST Sale of Land (“Hinshaw’s Sham Sale Tavares’ 139 TH Property”) <sup>138</sup>, in the amount of \$737,021.0 (“**Hinshaw’s Sham Sale Check**”), to further underlying schemes depriving and extorting U.S. citizen Charles Tavares (“Tavares”), under color of law, of all properties and rights upon sham proceedings in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11th Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) – and in eight (08) Related Cases, *see, Tavares’ Affidavit*, further money laundering the ill-gotten proceeds from Hinshaw’s Sham Sale Tavares’ 139 TH Property. At all relevant times, Cronig, Hinshaw, and Grove Bank know they are engaging in monetary transactions derived from specified unlawful activity, and know they are using artifices to money launder proceeds from properties extorted from Tavares’ 139 TH.

<sup>137</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>138</sup> *See*, Hinshaw’s [Sham Transfer 1](#), recorded with the [Clerk of Courts](#), on May 18, 2022 at 11:28 a.m., *see* [CFN 2022R0402953](#), showing a sale on May 3, **2020**, to NV Sand Group, Inc., a Florida corp. (“Varona”), in the amount of \$15,125,000, simultaneously recorded with a [Second Sham Transfer 2](#), from Varona to 137 TH AVE 8 ST, Holdings, LLC, and followed by [Sham Transfer 3](#), and [Sham Transfer 4](#), showing artifices to fraudulently cover up the scheme, and money launder ill-gotten proceeds. Tavares’ 139 TH’s Property was not publicly marketed by the CCE.

## COUNTS

**Count 306** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 307** - 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 property, and rights due process of law, to proper legal representation free from intimidation, harassment, and extortion of properties and rights upon a court of law in the United States, in violation of, among other things, Title 18 U.S.C. §241.

**Count 308** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using Electronic Wires to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 309** – Shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), at 2525 Ponce de Leon Blvd., Fourth Floor, Coral Gables, FL 33134, Grove Bank & Trust (“Grove Bank”) ([www.grovebankandtrust.com](http://www.grovebankandtrust.com)), and other Perpetrators implicated, did knowingly and intentionally, use electronic wires, as an artifice to further known criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares (“Tavares”), and Tavares’ 139TH Avenue SW 8 Street, LLC (“139 TH”), of properties and rights, under color of law, relating to a certain false, invalid, and fraudulent sham special Warranty Deed, **falsely dated May 3, 2020**, and recorded with the Clerk of the Courts in Miami-Dade County, Florida, on June 23, 2022 at 11:26 AM, fraudulently transferring U.S. citizen Charles Tavares (“Tavares”) 139 TH Avenue SW 8 Street, LLC’s (139 TH”) Properties and rights (“Property”) from “139th Avenue S.W. Eighth Street, LLC, a Florida Limited liability company” to NV Sand Group, Inc., a Florida corp., and knowingly and intentionally engaging in monetary transactions in Tavares’ 139 TH’s Property derived from specified unlawful activity, and engaging in, and issuing sham financial instruments to wit, among others, a certain [Grove Bank Cashier’s Check No. 6054](#), of July 19, 2022, to IBAC Asset Holders, Inc., in the amount of \$737,021.70, to money launder ill-gotten proceeds extorted from Tavares, in violation of, Title 18, U.S.C., § 1343 (Wire Fraud).

**Count 310** – At all times relevant, Steven Carlyle Cronig (“Cronig”), Hinshaw & Culbertson, LLP (“Hinshaw”), Grove Bank & Trust (“Grove Bank”) ([www.grovebankandtrust.com](http://www.grovebankandtrust.com)), and other Perpetrators implicated, knew, and had to know that they were all Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, inter alia, U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting

Tavares and Tavares' 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares' 139 TH, allowing the Perpetrators to falsely and fraudulently deal and steal the Properties, in violation of, Title 18 U.S.C., § 1957.

**Count 311** – Shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), at 2525 Ponce de Leon Blvd., Fourth Floor, Coral Gables, FL 33134, Grove Bank & Trust (“Grove Bank”) ([www.grovebankandtrust.com](http://www.grovebankandtrust.com)), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely deal and steal the Properties and money launder the ill-gotten proceeds, in violation of, Title 18 U.S.C., § 1956.

**Count 312** - Shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), at 2525 Ponce de Leon Blvd., Fourth Floor, Coral Gables, FL 33134, Grove Bank & Trust (“Grove Bank”) ([www.grovebankandtrust.com](http://www.grovebankandtrust.com)), and other Perpetrators implicated, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, FL, 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, fabricating and filing false documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, fraudulent transfer of Properties, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, bribery of officers of the court to further a scheme depriving and extorting Tavares of properties and rights upon sham proceedings in a court of law in the United States, and systematic violations of rights, contrary to Title 18 U.S.C. §1961 *et seq.* See, [Tavares Sworn Affidavit](#).

**Count 313**– Shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), at 2525 Ponce de Leon Blvd., Fourth Floor, Coral Gables, FL 33134, Grove Bank & Trust (“Grove Bank”) ([www.grovebankandtrust.com](http://www.grovebankandtrust.com)), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, *inter alia*, dealing with Charles Tavares’ (“Tavares”) stolen properties, and money laundering its ill-gotten proceeds, to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares to further a scheme upon the Miami Courts, systematically depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).



**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
314	<b>July 20, 2022 at 3:20 PM</b>	<b>U. S. CODE TITLE 18</b>	Daniel Joseph Marzano
		§ 371 Conspiracy to Defraud the USA	Coscolluela & Marzano, P.A.
315		&	Nelson Varona Sr.
		§ 241 Conspiracy Against Rights	NV Sand Group, Inc., a Fla. Corp.
316		&	Rodolfo Alvarez
		§ 1346 Scheme/Artifice to Defraud	Maria Gonzalez
317		&	137 TH AVE 8TH ST Holdings, LLC
		§ 1343 Wire Fraud	Steven Carlyle Cronig
318		&	Hinshaw & Culbertson, LLP
		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity	Gabriela M. Machado Guimaraes
319	&	Fernando Menendez Montes	
	§ 1956 Laundering of Monetary Instruments	Marco Emilio Rojas	
320	&	Nelson Slosbergas	
	§ 1961 <i>et seq.</i> – RICO	Ernesto Pereira Lopes	
321	&	AHS Residential a.k.a. RESIA, LLC	
	<b>FLORIDA STATUTES</b>	Bridgeloan Investors, Inc.	
	Title XLVI § 817.155 Fraudulent Practices	First American Title Insurance Co.	
		The Continued Criminal Enterprise	

On July 20, 2022, reckless attorney Daniel J. Marzano (“Marzano”) (Florida Bar No. 189.804), and other Perpetrators implicated, at all relevant times, conspiring with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise’s<sup>139</sup> (“Criminal Enterprise” or “CCE”) Associates to further an underlying scheme extorting U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, cause to be filed, with unclean hands, with the Clerk of the Courts, a Fourth Sham Warranty Deed of Tavares’ 139 TH Avenue SW 8 Street, LLC’s (“139 TH”) 29 Acres Properties (“Property”), from<sup>140</sup> Nelson Varona Sr.’s NV Sand Group, Inc., a Florida corp. (“Varona”) (Tax Id. #87 1122591) to Rodolfo Alvarez and Maria Gonzalez’s 137 TH AVE 8 TH ST Holdings, LLC, a Florida L.L.C. (“137 Holdings”) (Tax Id. #88-12 78066) for \$100 (“Sham Transfer 4”), see Clerk Records at CFN#2022R0402954. At all relevant times, Marzano, and other Perpetrators Implicated, know that they are engaging in monetary transactions in property derived from specified unlawful activity, and are furthering artifices to money launder and tax evade ill-gotten proceeds from Tavares’ 139 TH’s Property from underlying schemes in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC, Case No. 2018-29700-CA-04* (“Sham 139 TH Case”), in the 11th Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) – and in eight (08) Related Cases. See Tavares’ Affidavit. The record shows Marzano, and other Perpetrators Implicated, conscious of guilt, knowingly and intentionally, fabricating and causing to be filed and recorded with the Clerk of the Court in Miami-Dade County, Florida, patently facially contradictory and fraudulent Deeds furthering schemes.

<sup>139</sup> BRIDGELoAN, is an entity used by Joseph Horn’s (“Horn”) Transnational CCE, specialized in intercontinental money laundering billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF, ODEBRECHT offshoots, and other reckless real estate developers, jointly furthering schemes.

<sup>140</sup> The CCE causes two (02) fraudulent Deeds of Tavares 139 TH’s Properties to be recorded simultaneously on May 18, 2022, see, Sham Transfer 1 & Sham Transfer 2, to blur the record, and further schemes money laundering and tax evading ill-gotten proceeds from the scheme extorting Tavares, under color of law, upon sham proceedings in the Miami Courts, further depriving the United States of honest services.

## COUNTS

**Count 314** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 315** - 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 property, and rights due process of law, to proper legal representation free from intimidation, harassment, and extortion of properties and rights upon a court of law in the United States, in violation of, among other things, Title 18 U.S.C. §241.

**Count 316** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using Electronic Wires to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 317** – Reckless attorney Daniel Joseph Marzano (“Marzano”) (Florida Bar No. 189.804), Cosculluela & Marzano, P.A., and other Perpetrators implicated, did knowingly and intentionally, use electronic wire, as an artifice to further a brazen criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares (“Tavares”), and Tavares’ 139TH Avenue SW 8 Street, LLC (“139 TH”), of properties and rights, under color of law, relating to a certain false, invalid, and fraudulent transfer and sale, for \$100, of Tavares’ 139 TH’s 29 Acres Properties and rights (“Property”), from Nelson Varona Sr.’s NV Sand Group, Inc., a Florida corp. (“Varona”) to Rodolfo Alvarez and Maria Gonzalez’s 137 AVE 8TH ST Holdings, LLC, a Florida L.L.C. (“137 Holdings”) (Tax Id. #88-1378066) (“[Sham Transfer 4](#)”) recorded with the Clerk of the Court in Miami-Dade County, Florida, on July 20, 2022 at 3:20 PM, and the fraudulent sham Warranty Deed dated July 1, 2022, see [Clerk’s Record](#) at [CFN #2022R0580169](#), furthering criminals schemes defrauding Tavares of properties and rights, and depriving the State of Florida and the United States of America of honest services upon courts of law in the United States of America, in violation of, Title 18, U.S.C., § 1343 (Wire Fraud).

**Count 318** – At all times relevant, reckless attorney Daniel Joseph Marzano (“Marzano”) (Florida Bar No. 189.804), Cosculluela & Marzano, P.A., and other Perpetrators implicated, knew, and had to know that they were all engaging in a fraudulent monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely and fraudulently deal and steal the Properties, in violation of, Title 18 U.S.C., § 1957.

**Count 319**– At all times relevant, reckless attorney Daniel Joseph Marzano (“Marzano”) (Florida Bar No. 189.804), Cosculluela & Marzano, P.A., and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely deal and steal the Properties and money launder the ill-gotten proceeds,<sup>139</sup> in violation of, Title 18 U.S.C., § 1956.

**Count 320** - At all times relevant, reckless attorney Daniel Joseph Marzano (“Marzano”) (Florida Bar No. 189.804), Cosculluela & Marzano, P.A., and other Perpetrators implicated, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, FL, 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, fabricating and filing false documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, fraudulent transfer of Properties, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, bribery of officers of the court to further a scheme depriving and extorting Tavares of properties and rights upon sham proceedings in a court of law in the United States, and systematic violations of rights, contrary to Title 18 U.S.C. §1961 et seq.

**Count 321**– Shameless criminal Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”) and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, *inter alia*, dealing with Charles Tavares’ (“Tavares”) stolen properties, and money laundering its ill-gotten proceeds, to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares to further a scheme upon the Miami Courts, systematically depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

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<sup>141</sup> See, Hinshaw’s Fraudulent Transfer and Sale of Tavares’ 139 TH’s 29 Acres to NV Sand Group, Inc., a Florida corp. (“NV Sand”) (FEI# 87-1122591) presided by Nelson Varona, Sr. (“Varona”), on May 3, 2022, for \$15,125,000.00, and net sales proceeds were \$13,999,158.45, and that, accordingly, Tavares’ proceeds will be \$737,021, despite Tavares having a 52% interest on 139 TH. Cronig attaches to his letter, a bogus Settlement Statement (“HUD-1”) (File # CLGL-122) form with five pages showing criminal Guimaraes signing on for seller 139 TH on May 2, 2022 and no signature for Varona’s NV Sand. The HUD-1 form shows that 139 TH paid a total of \$907,500.00 in commissions to brokers The Katsikos Group, Inc., a Florida corp. (FEI#20-3165923) presided by Lee S. Katsikos (jointly “Katsikos”) receiving \$453,750.00, and “Your Commercial Realty Group”<sup>27</sup> also receiving \$453,750.00. The settlement agent is CM Law Group, LLC a.k.a. Cosculluela & Marzano, P.A. with attorneys Michael Cosculluela (“Cosculluela”) (Fla. Bar No. 189.480) and Daniel J. Marzano (“Marzano”) (Fla. Bar No.189.804) as agents for First American Title Insurance Company a.k.a First American Financial Corporation (“First American”) (stock symbol NYSE “FAF”) charging \$36,575.00 for the owner’s Title Insurance Policy, and charging 139 TH \$400.00 for “Title Search Fee to First American.” The United States’ HUD-1 Form also shows charges to 139 TH for “City/ County Tax/Stamps Deed” in the amount of \$68,062.50 and “State Tax/ Stamps deed mortgage \$90,750.00. The HUD-1 also shows 139 TH paying “Lien Letters to One-Step Lien Search LLC (FEI #65-11 36977) in the amount of \$798.00 (Seven Hundred Ninety Eight Dollars), and “legal fees” paid to Hinshaw Law in the amount of \$50,000.00 to participate in the brazen scheme extorting and depriving Tavares of properties and rights, and the State of Florida, and the United States. See [Sham Transfer 1](#).

**COUNT** **APROX. DATE****VIOLATIONS****PERPETRATORS**

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
322	January 25, 2023	<b>U. S. CODE TITLE 18</b> § 371 Conspiracy to Defraud the USA &	Steven Carlyle Cronig Hinshaw & Culbertson, LLP
323		§ 241 Conspiracy Against Rights &	Gabriela M. Machado Guimaraes Fernando Menendez Montes
324		§ 1346 Scheme/Artifice to Defraud &	Wolters Kluwer, N.V. Nelson Slosbergas
325		§ 1343 Wire Fraud &	Hugo Barreto Del Priore Ernesto Pereira Lopes
326		§ 1349 Conspiracy to Defraud &	Rubens Menin Teixeira de Souza AHS Development a.k.a. RESIA, LLC
327		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	Marco Emilio Rojas Peter Francis Valori
328		§ 1961 <i>et seq.</i> – RICO &	<a href="#">Joseph Horn</a> Ralph Horn
329		<b>FLORIDA STATUTES</b> Title XLVI § 817.155 Fraudulent Practices	Ricardo Eichenwald Bridgeloan Investors, Inc. The Continued Criminal Enterprise

On January 25, 2023, shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), and other Perpetrators, at all relevant times, conspiring with other Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise<sup>142</sup> (“Criminal Enterprise” or “CCE”), to further an underlying scheme extorting U.S. citizen Charles Tavares (“Tavares”) and Tavares’ 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) of Properties and rights (“Property”), file, with unclean hands, 139 TH’s [2023 Annual Report](#) with the [Florida Secretary of State website](#) (“SUNBIZ”) (“Cronig’s Fraudulent SUNBIZ Report”), see Document #L03000029150, on 01/25/2023. Cronig, to further the scheme successfully depriving and extorting Tavares of Property, fraudulently signs as “Manager” of Tavares’ 139 TH, and Associate CT Corporation System a.k.a. Wolters Kluwer, N.V. (“Wolters Kluwer”) at 1200 South Pine Island Road, Plantation, Florida 33324, as 139 TH’s Registered Agent. Cronig reports to SUNBIZ that, 139 TH’s “Current Principal Place of Business” is at 3193 Oak Avenue, Coconut Grove, Miami, Florida 33133 (“Guimaraes’ Home Address”); and “Current Mailing Address” is 80 SW 8<sup>th</sup> Street, Suite 2000, Miami, Florida 33130 (“Guimaraes’ Regus’ Shared Office Address”). At all relevant times, Cronig, Hinshaw, *et al.*, know that they are furthering schemes to deprive Tavares of properties and rights, under color of law, and after successfully stealing proceeds from a sham sale of Tavares’ 139 TH’s Property, staging Four (04) Sham Transfers<sup>143</sup> to cover up the schemes, and money launder the ill-gotten proceeds, they continue filing sham official documents of Tavares’ 139 TH to cover up scheme, and to prevent justice.

<sup>142</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>143</sup> See, the [Four \(04\) Sham Warranty Deeds](#), fraudulently transferring Tavares’ 139 TH Property and Rights; (1) [Sham Transfer 1](#), for \$15,125,000, and (2) [Sham Transfer 2](#), for \$100, on 5/18/2022 at 11:28 AM; (3) [Sham Transfer 3](#), for \$0, on 6/23/2022; and (4) [Sham Transfer 4](#), for \$100, on 7/20/2022, to cover up the schemes extorting Tavares, and money launder the proceeds, depriving the United States of America.

## **COUNTS**

**Count 322** - Shameless criminals Steven Carlyle Cronig, Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 323** - Shameless criminals Steven Carlyle Cronig, Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 324** - Shameless criminals Steven Carlyle Cronig, Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 325** - Shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of Properties and rights (“Property”), and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”), and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, money laundering the ill-gotten proceeds from Tavares’ Property, further depriving the State of Florida and the United States of honest services, files with the Florida’s Secretary of State’s website SUNBIZ, knowingly and intentionally, transmit, with unclean hands, on January 25, 2023, [Via Electronic Wire](#) to wit - a certain false and invalid [2023 Annual Report](#) of Tavares’ 139 TH with the [Florida Secretary of State website](#) (“SUNBIZ”) (“**Cronig’s Fraudulent SUNBIZ Report**”), see Document #L03000029150, on 01/25/2023, for the purpose of executing schemes and preventing justice, in violation of Title 18 U.S.C. §1343.

**Count 326** – Shameless criminals Steven Carlyle Cronig, Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles



Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 327** - Shameless criminals Steven Carlyle Cronig ("Cronig") (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP ("Hinshaw"), Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knew, and had to know, that they are all Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, *inter alia*, U.S. citizen Charles Tavares' ("Tavares") and Tavares' 139TH Avenue SW 8 Street, LLC's ("139 TH") Properties and rights ("Property"), extorted and stolen Properties by Cronig, Hinshaw, Guimaraes, *et al.* The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.'s ("BRIDGELoAN") Transnational Continued Criminal Enterprise ("CCE" or "Criminal Enterprise"), systematically depriving and extorting Tavares and Tavares' 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares' 139 TH, allowing the Perpetrators to falsely and fraudulently deal and steal the Properties, in violation of, Title 18 U.S.C., § 1957.

**Count 328** - At all times relevant, shameless criminals Steven Carlyle Cronig ("Cronig") (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP ("Hinshaw"), Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 329** – Shameless criminals Steven Carlyle Cronig ("Cronig") (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP ("Hinshaw"), Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares' 139 TH, producing sham corporate resolutions of 139 TH, and transmitting aforesaid sham documents to, *inter alia*, the Florida Secretary of State's website SUNBIZ, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).



**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

330	<b>March 6, 2024 at 11:39 AM</b>	<b><u>U. S. CODE TITLE 18</u></b> § 371 Conspiracy to Defraud the USA &	Gabriela M. Machado Guimaraes Steven Carlyle Cronig Hinshaw & Culbertson, LLP
331		§ 241 Conspiracy Against Rights &	<a href="#">Grove Bank &amp; Trust</a> Fernando Menendez Montes
332		§ 1346 Scheme/Artifice to Defraud &	Marco Emilio Rojas Peter Francis Valori
333		§ 1343 Wire Fraud &	Nelson Slosbergas Hugo Barreto Del Priore
334		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	AHS Residential a.k.a. RESIA, LLC Bridgeloan Investors, Inc. Nelson Varona Sr.
335		§ 1956 Laundering of Monetary Instruments &	NV Sand Group, Inc., a Fla. Corp. Your Home Realty Group, Inc.
336		§ 1961 <i>et seq.</i> – RICO &	Daniel J. Marzano First American Title Insurance Co.
337		<b><u>FLORIDA STATUTES</u></b> Title XLVI § 817.155 Fraudulent Practices	Lee S. Katsikos The Continued Criminal Enterprise

On March 6, 2024, shameless criminal Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil) at all relevant times, conspiring with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Criminal Enterprise<sup>144</sup> (“Criminal Enterprise” or “CCE”), to further an underlying scheme depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, transmits, with unclean hands, [fraudulent Federal Tax Returns and K-1’s of Tavares’ company 139 TH Avenue SW 8 Street, LLC’s](#) (“139 TH”) (“**Guimaraes Fraudulent Tax Return**”), after extorting and stealing<sup>145</sup> Tavares’ 139 TH’s Properties (“Property”). The Sham Transfers are artifices by the CCE to, *inter alia*, blur the record, money launder, and tax evade the ill-gotten proceeds from underlying schemes in the Sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139 TH Avenue SW 8 Street, LLC, v. Third-Party Defendants Marco E. Rojas, Nelson Slosbergas, Hugo B. Del Priore, and AHS Residential, LLC*, Case No. 2018-29700-CA-04 (“Sham 139 TH Case”), in the 11th Judicial Circuit in Miami-Dade County, FL (“Miami Courts”) – and in eight (08) Related Cases. See [Tavares’ Affidavit](#). At all relevant times, Guimaraes, and other Perpetrators implicated know that they are dealing with stolen properties, obtained by unlawful means, *inter alia*, from Tavares’ extortion, under color of law, in subverting proceedings, further depriving the United States of honest services, and they are continuing to perpetrate crimes depriving Tavares, Tavares’ 139 TH, the State of Florida, and the United States.

<sup>144</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn’s](#) (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked BANIF](#), [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>145</sup> See, the [Sham Transfer 1](#) & [Sham Transfer 2](#), fraudulently simultaneously recorded with the Clerk of the Courts on May 18, 2022 at 11:28:31 AM, the [Sham Transfer 3](#) fraudulently recorded on June 23, 2022, and the [Sham Transfer 4](#) fraudulently recorded on July 20, 2022, to blur the record, money launder and tax evade ill-gotten proceeds from the schemes.

## COUNTS

**Count 330** - 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 by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States' Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 331** - 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 property, and rights due process of law, to proper legal representation free from intimidation, harassment, and extortion of properties and rights upon a court of law in the United States, in violation of, among other things, Title 18 U.S.C. §241.

**Count 332** - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using Electronic Wires to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 333** – Shameless criminal Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil) ([gabriela@g2investusa.com](mailto:gabriela@g2investusa.com)), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares (“Tavares”), and Tavares’ 139TH Avenue SW 8 Street, LLC (“139 TH”), of properties and rights, under color of law, the transmission through electronic wire, of fraudulent [Federal Tax Returns for the year ending 12/2023 for Tavares’ 139 TH Avenue SW 8 Street, LLC](#), a Florida L.L.C., signed by criminal Guimaraes, predicated on authority by invalid and false forged signatures, purportedly from straw man Fernando Menendez Montes (“Montes”), a bad actor in the Republic of Panamá without any authority whatsoever over Tavares’ 139 TH, to wit, *Via Email* to, *inter alia*, (a) Charles Tavares ([charlesatavares@hotmail.com](mailto:charlesatavares@hotmail.com)) (b) Flavia P. Tenorio ([flaviaptenorio@gmail.com](mailto:flaviaptenorio@gmail.com)); (c) Marco E. Rojas ([mrojas@rslaw.com](mailto:mrojas@rslaw.com)); (d) Hugo Barreto Del Priore ([hdelpriore@argonpart.com.br](mailto:hdelpriore@argonpart.com.br)); (e) Peter F. Valori ([pvalori@dvllp.com](mailto:pvalori@dvllp.com)); and (f) Francisco Alfonso Mesa Schuler ([fmesa888@aol.com](mailto:fmesa888@aol.com)), further defrauding the United States of America, in violation of, Title 18, U.S.C., § 1343 (Wire Fraud).

**Count 334** – At all times relevant, shameless criminal Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knew, and had to know that they were all engaging in a fraudulent monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely and fraudulently deal and steal the Properties, in violation of, Title 18 U.S.C., § 1957.

**Count 335** – At all times relevant, shameless criminal Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for U.S. citizen Charles Tavares’ (“Tavares”) 139TH Avenue SW 8 Street, LLC’s (“139 TH”) extorted and stolen Properties. The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), systematically depriving and extorting Tavares and Tavares’ 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares’ 139 TH, allowing the Perpetrators to falsely deal and steal the Properties and money launder the ill-gotten proceeds,<sup>144</sup> in violation of, Title 18 U.S.C., § 1956.

**Count 336** - At all times relevant, shameless criminal Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, FL, 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, fabricating and filing false documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, fraudulent transfer of Properties, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, bribery of officers of the court to further a scheme depriving and extorting Tavares of properties and rights upon sham proceedings in a court of law in the United States, and systematic violations of rights, contrary to Title 18 U.S.C. §1961 *et seq.* See, [Tavares Sworn Affidavit](#).

**Count 337** – Shameless criminal Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, *inter alia*, dealing with Charles Tavares’ (“Tavares”) stolen properties, and money laundering its ill-gotten proceeds, to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares to further a scheme upon the Miami Courts, systematically depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

<sup>146</sup> See, Hinshaw’s Fraudulent Transfer and Sale of Tavares’ 139 TH’s 29 Acres to NV Sand Group, Inc., a Florida corp. (“NV Sand”) (FEI# 87-1122591) presided by Nelson Varona, Sr. (“Varona”), on May 3, 2022, for \$15,125,000.00, and net sales proceeds were \$13,999,158.45, and that, accordingly, Tavares’ proceeds will be \$737,021, despite Tavares having a 52% interest on 139 TH. Cronig attaches to his letter, a bogus Settlement Statement (“HUD-1”) (File # CLGL-122) form with five pages showing criminal Guimaraes signing on for seller 139 TH on May 2, 2022 and no signature for Varona’s NV Sand. The HUD-1 form shows that 139 TH paid a total of \$907,500.00 in commissions to brokers The Katsikos Group, Inc., a Florida corp. (FEI#20-3165923) presided by Lee S. Katsikos (jointly “Katsikos”) receiving \$453,750.00, and “Your Commercial Realty Group”<sup>27</sup> also receiving \$453,750.00. The settlement agent is CM Law Group, LLC a.k.a. Cosculluela & Marzano, P.A. with attorneys Michael Cosculluela (“Cosculluela”) (Fla. Bar No. 189.480) and Daniel J. Marzano (“Marzano”) (Fla. Bar No.189.804) as agents for First American Title Insurance Company a.k.a First American Financial Corporation (“First American”) (stock symbol NYSE “FAF”) charging \$36,575.00 for the owner’s Title Insurance Policy, and charging 139 TH \$400.00 for “Title Search Fee to First American.” The United States’ HUD-1 Form also shows charges to 139 TH for “City/ County Tax/Stamps Deed” in the amount of \$68,062.50 and “State Tax/ Stamps deed mortgage \$90,750.00. The HUD-1 also shows 139 TH paying “Lien Letters to One-Step Lien Search LLC (FEI #65-11 36977) in the amount of \$798.00 (Seven Hundred Ninety Eight Dollars), and “legal fees” paid to Hinshaw Law in the amount of \$50,000.00 to participate in the brazen scheme extorting and depriving Tavares of properties and rights, and the State of Florida, and the United States. See [Sham Transfer 1](#).

**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

338	<b>March 18, 2024</b>	<b><u>U. S. CODE TITLE 18</u></b>	Gabriela M. Machado Guimaraes
339		§ 371 Conspiracy to Defraud the USA	Fernando Menendez Montes
340		&	Wolters Kluwer, N.V.
341		§ 241 Conspiracy Against Rights	Steven Carlyle Cronig
342		&	Hinshaw & Culbertson, LLP
343		§ 1346 Scheme/Artifice to Defraud	Nelson Slosbergas
344		&	Hugo Barreto Del Priore
345		§ 1343 Wire Fraud	Ernesto Pereira Lopes
		&	Rubens Menin Teixeira de Souza
		§ 1349 Conspiracy to Defraud	AHS Development a.k.a. RESIA, LLC
		&	Marco Emilio Rojas
		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity	Peter Francis Valori
		&	<a href="#">Joseph Horn</a>
		§ 1961 <i>et seq.</i> – RICO	Ralph Horn
		&	Ricardo Eichenwald
		<b>FLORIDA STATUTES</b>	Bridgeloan Investors, Inc.
		Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise

On March 18, 2024, shameless criminals Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators, at all relevant times, conspiring with other Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise<sup>147</sup> (“Criminal Enterprise” or “CCE”), to further an underlying scheme extorting U.S. citizen Charles Tavares (“Tavares”) and Tavares’ 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) of Properties and rights (“Property”), cause to be filed, with unclean hands, 139 TH’s [2024 Annual Report](#) with [Florida Secretary of State website](#) (“SUNBIZ”) (“**Guimaraes Fraudulent SUNBIZ Report**”), see Document #L03000029150, on 03/18/2024. Guimaraes, *et al.*, to further the scheme successfully depriving and extorting Tavares of Property, fraudulently signs as “*WEST EIGHTH CORP. Manager*” of Tavares’ 139 TH, and Associate CT Corporation System a.k.a. Wolters Kluwer, N.V. (“Wolters Kluwer”), at 1200 South Pine Island Road, Plantation, Florida 33324, as 139 TH’s Registered Agent. Guimaraes Fraudulent SUNBIZ Report shows 139 TH’s “*Current Principal Place of Business*” at 3193 Oak Avenue, Coconut Grove, Miami, FL 33133 (“Guimaraes’ Home Address”); and “*Current Mailing Address*” at 80 SW 8<sup>th</sup> Street, Suite 2000, Miami, FL 33130 (“Guimaraes’ Regus’ Shared Office Address”). At all relevant times, Guimaraes, *et al.*, know that they are furthering schemes depriving Tavares of properties and rights, under color of law, and after successfully stealing proceeds from a sham sale of Tavares’ 139 TH’s Property, staging Four (04) Sham Transfers<sup>148</sup> to cover up the schemes, and money launder the ill-gotten proceeds, they continue filing sham official documents to prevent justice.

<sup>147</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and [attorneys that hijacked](#) BANIF, [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>148</sup> See, the [Four \(04\) Sham Warranty Deeds](#), fraudulently transferring Tavares’ 139 TH Property and Rights; (1) [Sham Transfer 1](#), for \$15,125,000, and (2) [Sham Transfer 2](#), for \$100, on 5/18/2022 at 11:28 AM; (3) [Sham Transfer 3](#), for \$0, on 6/23/2022; and (4) [Sham Transfer 4](#), for \$100, on 7/20/2022, to cover up the schemes extorting Tavares, and money launder the proceeds, depriving the United States of America.

## COUNTS

**Count 338** - Shameless criminals Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 339**- Shameless criminals Gabriela Maranhao Machado Guimaraes, Steven Carlyle Cronig, Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 340** - Shameless criminals Gabriela Maranhao Machado Guimaraes, Steven Carlyle Cronig, Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 341** - Shameless criminals Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators, and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of Properties and rights (“Property”), and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”), and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, money laundering the ill-gotten proceeds from Tavares’ Property, further depriving the State of Florida and the United States of honest services, file with the Florida’s Secretary of State’s website SUNBIZ, knowingly and intentionally, transmitting, with unclean hands, on March 18, 2024, Via Electronic Wire to wit - a certain false and invalid [2024 Annual Report](#) of Tavares’ 139 TH with the [Florida Secretary of State website](#) (“SUNBIZ”) (“Cronig’s Fraudulent SUNBIZ Report”), see Document #L03000029150, on 03/18/2024, for the purpose of executing schemes and preventing justice, in violation of Title 18 U.S.C. §1343.

**Count 342** – Shameless criminals Gabriela Maranhao Machado Guimaraes, Steven Carlyle Cronig (“Cronig”), Hinshaw & Culbertson, LLP (“Hinshaw”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent



documents and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 343** - Shameless criminals Steven Carlyle Cronig ("Cronig") (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP ("Hinshaw"), Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knew, and had to know, that they are all Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, *inter alia*, U.S. citizen Charles Tavares' ("Tavares") and Tavares' 139TH Avenue SW 8 Street, LLC's ("139 TH") Properties and rights ("Property"), extorted and stolen Properties by Cronig, Hinshaw, Guimaraes, *et al.* The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.'s ("BRIDGELoAN") Transnational Continued Criminal Enterprise ("CCE" or "Criminal Enterprise"), systematically depriving and extorting Tavares and Tavares' 139 TH by coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares' 139 TH, allowing the Perpetrators to falsely and fraudulently deal and steal the Properties, in violation of, Title 18 U.S.C., § 1957.

**Count 344** - At all times relevant, shameless criminals Gabriela Maranhao Machado Guimaraes, Steven Carlyle Cronig, Hinshaw & Culbertson, LLP ("Hinshaw"), and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 345** – Shameless criminals Steven Carlyle Cronig ("Cronig") (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP ("Hinshaw"), Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares' 139 TH, producing sham corporate resolutions of 139 TH, and transmitting aforesaid sham documents to, *inter alia*, the Florida Secretary of State's website SUNBIZ, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).



**COUNT APROX. DATE**

**VIOLATIONS**

**PERPETRATORS**

346	<b>April 1, 2024</b>	<b><u>U. S. CODE TITLE 18</u></b>	Steven Carlyle Cronig
347		§ 371 Conspiracy to Defraud the USA	Hinshaw & Culbertson, LLP
348		&	Gabriela M. Machado Guimaraes
349		§ 241 Conspiracy Against Rights	Fernando Menendez Montes
350		&	Nelson Slosbergas
351		§ 1346 Scheme/Artifice to Defraud	Hugo Barreto Del Priore
352		&	Ernesto Pereira Lopes
353		§ 1343 Wire Fraud	Rubens Menin Teixeira de Souza
		&	AHS Development a.k.a. RESIA, LLC
		§ 1349 Conspiracy to Defraud	Marco Emilio Rojas
		&	Peter Francis Valori
		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity	<a href="#">Joseph Horn</a>
		&	Ralph Horn
		§ 1961 <i>et seq.</i> – RICO	Ricardo Eichenwald
		&	Bridgeloan Investors, Inc.
		<b><u>FLORIDA STATUTES</u></b>	The Continued Criminal Enterprise
		Title XLVI § 817.155 Fraudulent Practices	

On April 1, 2024, shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), and other Perpetrators, at all relevant times, conspiring with other Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise<sup>149</sup> (“Criminal Enterprise” or “CCE”), to further an underlying scheme extorting U.S. citizen Charles Tavares (“Tavares”) and Tavares’ 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202407) of Properties and rights (“Property”), cause to be filed, with unclean hands, 139 TH’s [Amended 2024 Annual Report](#) with [Florida Secretary of State website](#) (“SUNBIZ”) (“**Cronig’s Fraudulent SUNBIZ Amended Report**”), see Document #L03000029150, on 04/01/2024. Cronig, *et al.*, to further the scheme successfully depriving and extorting Tavares of Property, fraudulently signs as “WEST EIGHTH CORP. Manager” of Tavares’ 139 TH, and Cronig signs as 139 TH’s Registered Agent at 2811 Ponce de Leon Boulevard, Suite 1000, Coral Gables, FL 33134. Cronig’s Fraudulent SUNBIZ Report shows 139 TH’s “Current Principal Place of Business” at 3193 Oak Avenue, Coconut Grove, Miami, FL 33133 (“Guimaraes’ Home Address”); and “Current Mailing Address” at Guimaraes’ Home Address. At all relevant times, Cronig, Hinshaw, Guimaraes, *et al.*, know that they are furthering schemes depriving Tavares of properties and rights, under color of law, and after successfully stealing proceeds from a sham sale of Tavares’ 139 TH’s Property, staging Four (04) Sham Transfers<sup>150</sup> to cover up the schemes, and money launder the ill-gotten proceeds, they continue filing sham official documents to prevent justice.

<sup>149</sup> [BRIDGELoAN](#), is an entity used by [Joseph Horn](#)’s (“Horn”) Transnational CCE, specialized in [intercontinental money laundering](#) billions of dollars, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, tax, bank, and securities’ fraud schemes through the United States to reckless domestic and international investors, joined together by [BANIF Bank](#)’s (“BANIF”) corrupt executives and [attorneys that hijacked BANIF](#), [ODEBRECHT offshoots](#), and other [reckless real estate developers](#), jointly furthering schemes.

<sup>150</sup> See, the Four (04) Sham Warranty Deeds, fraudulently transferring Tavares’ 139 TH Property and Rights; (1) [Sham Transfer 1](#), for \$15,125,000, and (2) [Sham Transfer 2](#), for \$100, on 5/18/2022 at 11:28 AM; (3) [Sham Transfer 3](#), for \$0, on 6/23/2022; and (4) [Sham Transfer 4](#), for \$100, on 7/20/2022, to cover up the schemes extorting Tavares, and money launder the proceeds, depriving the United States of America.

## COUNTS

**Count 346** - Shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States’ Judicial, Banking, Securities and Tax Collection systems in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 347**- Shameless criminals Steven Carlyle Cronig, Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Charles 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 property and rights, to proper and honest legal representation by Florida bar licensees, rights to own properties in the United States of America free from intimidation and extortion of properties and rights, in violation of, among other things, Title 18 U.S.C. §241.

**Count 348** - Shameless criminals Steven Carlyle Cronig, Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Courts, Banking, Securities, and Housing markets, and defraud and extort citizens of properties and rights to further underlying criminal schemes in Florida, and elsewhere they operate, further using mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

**Count 349** - Shameless criminals Steven Carlyle Cronig (“Cronig”) (New York Bar No. 4.977.419 and Florida Bar No. 307.068), Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), and other Perpetrators, and other Perpetrators implicated, knowingly and intentionally conspiring to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of Properties and rights (“Property”), and Tavares’ company 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”), and to further an underlying scheme subverting Florida courts to steal, deprive, and extort Tavares of all rights and properties, money laundering the ill-gotten proceeds from Tavares’ Property, further depriving the State of Florida and the United States of honest services, file with the Florida’s Secretary of State’s website SUNBIZ, knowingly and intentionally, transmitting, with unclean hands, on April 1, 2024, Via Electronic Wire to wit - a certain false and invalid [Amended 2024 Annual Report](#) of Tavares’ 139 TH with the [Florida Secretary of State website](#) (“SUNBIZ”) (“Cronig’s **Fraudulent SUNBIZ Report**”), see Document #L03000029150, on 04/01/2024, for the purpose of executing schemes and preventing justice, in violation of Title 18 U.S.C. §1343.

**Count 350** – Shameless criminals Steven Carlyle Cronig, Hinshaw & Culbertson, LLP (“Hinshaw”), Gabriela Maranhao Machado Guimaraes, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use, submit and transmit, via wire across state and countries lines, fraudulent documents

and/or instruments, to further the known criminal scheme depriving and extorting U.S. citizen Charles Tavares, courts of law in the United States of America, and the United States of America, in violation of, Title 18, U.S.C., § 1349.

**Count 351** - Shameless criminals Steven Carlyle Cronig ("Cronig") (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP ("Hinshaw"), Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knew, and had to know, that they are all Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, *inter alia*, U.S. citizen Charles Tavares' ("Tavares") and Tavares' 139TH Avenue SW 8 Street, LLC's ("139 TH") Properties and rights ("Property"), extorted and stolen Properties by Cronig, Hinshaw, Guimaraes, *et al.* The record displayed shows a brazen underlying scheme by Bridgeloan Investors, Inc.'s ("BRIDGELoAN") Transnational Continued Criminal Enterprise ("CCE" or "Criminal Enterprise"), systematically depriving and extorting Tavares and Tavares' 139 TH by, coercion, intimidation, extortion, fabrication of evidence and false authority of 139 TH, and subverting Florida courts to legalize the hijacking of Tavares' 139 TH, allowing the Perpetrators to falsely and fraudulently deal and steal the Properties, in violation of, Title 18 U.S.C., § 1957.

**Count 352** - At all times relevant, shameless criminals Steven Carlyle Cronig, Hinshaw & Culbertson, LLP ("Hinshaw"), Gabriela Maranhao Machado Guimaraes, and other Perpetrators implicated, and other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, fabricating and filing fraudulent documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, bribery of officers of the court to further a scheme coercing, depriving, stealing and extorting Chares Tavares' properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, engaging in monetary transactions in property derived from specified unlawful activity, and depriving the State of Florida and the United States of America of honest services upon courts of law, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

**Count 353** – Shameless criminals Steven Carlyle Cronig ("Cronig") (New York Bar No. 4.977.419 & Florida Bar No. 307.068), Hinshaw & Culbertson, LLP ("Hinshaw"), Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/17/1965, in Brazil), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting Tavares and other Members of 139 TH, fabricating and forging false and invalid indicia of membership interest of Tavares' 139 TH, producing sham corporate resolutions of 139 TH, and transmitting aforesaid sham documents to, *inter alia*, the Florida Secretary of State's website SUNBIZ, to further underlying criminal schemes upon the Miami Courts, depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).



## COUNTS

**Count 354** - Chief Judge Bertila Ana Soto, Administrative Judge Jennifer D. Bailey, the Miami Courts, and the Miami Court's Counsel, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States 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 in order to further major criminal schemes against the United States, in violation of Title 18 U.S.C. §371.

**Count 355** - Chief Judge Bertila Ana Soto, Administrative Judge Jennifer D. Bailey, the Miami Courts, and the Miami Court's Counsel, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States -- that is, among other things, the right to an uncorrupted and not subverted judicial machinery, due process of law, the right to be free from intimidation, harassment, and abuse in a court of law, and rights to property, in violation of, among other things, Title 18 U.S.C. §241.

**Count 356** - Judge Bertila Ana Soto, Judge Jennifer D. Bailey, the Miami Courts, and the Miami Court's Counsel, Enablers and other Perpetrators implicated, as officers of the courts, 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, Title 18 U.S.C. §242.

**Count 357** - Chief Judge Bertila Ana Soto, Administrative Judge Jennifer D. Bailey, the Miami Courts, and the Miami Court's Counsel, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America, the State of Florida, and citizens, of the right to honest services upon courts of law in the United States, by among other things, corrupting and subverting the judicial machinery to further an underlying criminal scheme upon, and by the subverted Miami Courts of law, in violation of Title 18 U.S.C. §1346.

**Count 358** - At all times relevant, Chief Judge Bertila Ana Soto, Administrative Judge Jennifer D. Bailey, the Miami Courts, and the Miami Court's Counsel, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, crimes against the United States, money laundering of illicit funds, extortion, and systematic violation of rights, contrary to Title 18 U.S.C. §1961 *et seq.* See, e.g., the Record filed in this matter, and [Tavares Sworn Affidavit](#).

**Count 359** - Chief Judge Bertila Ana Soto ("Chief Judge Soto"), Administrative Judge Jennifer D. Bailey ("Judge Bailey"), shameless corrupt Judge Carlos Manuel Guzman ("Judge Guzman") (Fla. Bar No. the Miami Courts, and the Miami Court's Counsel, and other Perpetrators implicated, knowingly and intentionally, commit fraudulent acts to further a brazen known scheme extorting Defendant and victim

Charles Tavares (“Tavares”) of all properties and rights, under color of law, upon *Kangaroo Courts*, in several sham Related Cases, *e.g.*, in the sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares v. 139TH Avenue SW 8 Street, LLC, v. AHS Residential, LLC v. Marco Emilio Rojas, v. R&S International Law Group v. Nelson Slosbergas v. Nelson Slosbergas, P.A. v. Hugo Barreto Del Priore*, Case No. 2018-29700-CA-04 (“139 TH Sham Case”), and in Eight (08) other sham Related Cases, in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”). See [Tavares’ Affidavit](#). The record displayed shows to any reasonable outside honest observer that the 139 TH Sham Case is filed by longtime criminals Peter Francis Valori (“Peter”) (Fla. Bar No. 43.516), Amanda Lara Fernandez (“Fernandez”) (Fla. Bar No. 106.931), Russell Marc Landy (“Landy”)(Fla. Bar No. 44.417), Damian & Valori, LLP (“Valori”), using the CCE’s same *Modus Operandi, e.g.*, fabricating and forging false and invalid indicia of membership interest and authority of 139 TH, corrupting and subverting court proceedings and officers of the court, filing sham and contradictory claims, two fraudulent and contradictory Declarations to the Court by criminal Marco Emilio Rojas (“Rojas”) (Fla. Bar No. 940.453) in support of sham claims, and the Miami Courts’ systematic violations of law, due process, and Tavares’ rights, by, *inter alia*, repeatedly and systematically holding improperly set and noticed invalid proceedings to knowingly and intentionally deprive and extort Tavares of properties and rights, under color of law. See Record. At all relevant times, the Miami Courts, Chief Judge Soto, Judge Bailey, the Miami Court’s Counsel, the judges implicated, and other Perpetrators implicated, knew, and had to know of the schemes systematically depriving and extorting Tavares of Properties and rights under color of law in the 139 TH Sham Case, and in other sham Related Cases, and knowingly and intentionally failed to stop the schemes in order to further the schemes and protect the Perpetrators, in violation of, §817.155, F.S. (Fraudulent Practices).

**Count 360** – Chief Judge Bertila Ana Soto, Judge Jennifer D. Bailey, the Miami Courts, and other officers of the court implicated, did knowingly and intentionally, use their judicial powers as guise to commit crimes, willfully participating in the brazen and known criminal scheme, to further the systematic subversion of the courts by the Associates implicated, systematically depriving, extorting, and violating Tavares’ rights, of constitutionally guaranteed rights, due process, to further a known brazen scheme depriving and extorting Tavares of his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.06, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.



361	<b>From at Least in or Around 2011 and Continuing</b>	<b>U. S. CODE TITLE 18</b>	The Florida Bar Joshua E. Doyle John F. Harkness The Board of Governors Fla. Bar Annemarie C. Craft Arlene Kalish Sankel
362		§ 371 Conspiracy to Defraud the United States of America &	
363		§ 241 Conspiracy Against Rights &	
364		§ 242 Deprivation of Rights Under Color of Law &	
365		§ 1346 Scheme/Artifice to Defraud Honest Services &	
366		§ 1341 Mail Fraud & <b>FLORIDA BAR RULES OF CONDUCT</b> Misconduct –Dishonesty-Fraud-Deceit Rule 4-8.4 (a)(b)(c)(d)	

From at least 2011, and continuing, The Florida Bar,<sup>153</sup> and its Directors and attorneys, (all “Florida Bar”), knowingly and intentionally, in reckless disregard for the law, the Constitution, rights, Fla. R. Civ. P., the Florida Bar’s constitutional mandate and Rules of Professional Conduct, systematically deprives the United States, the State of Florida, Florida courts, the Florida Bar’s 122,000 members, and citizens, of, *inter alia*, honest Services, by, recklessly and systematically choosing not to enforce its own rules and mandate, allowing and enabling reckless members of the Florida Bar, known Associates of a Continued Criminal Enterprise (“CCE”), to systematically perpetrate violations of law, the Constitution, rights, Fla. R. Civ. P., and Rules of Professional Conduct, to further rackets against Charles Tavares (“Tavares”), the United States, the State of Florida, Florida courts, and the Florida Bar, showing the Florida Bar’s reckless disregard for the law, the public, and its own rules and mandate. Despite Tavares’ served complaints<sup>154</sup> against implicated attorneys using their Florida Bar licenses as guise to systematically commit crimes against Tavares, *et al.*, perpetrating frauds upon Florida courts to further schemes, *e.g.*, fabricating fraudulent settlements predicated on fabricated sham authority, depriving, stealing and extorting Tavares, and Tavares’s Companies of properties and rights, under color of law in subverted proceedings, threatening and extorting Tavares, under color of law, filing fraudulent claims, pleadings, Affidavits, and settlements, that they all know to be false and invalid, repeatedly holding unnoticed invalid staged sham *Trials* to legalize the extortion, depriving Tavares of all properties and rights, money laundering ill-gotten proceeds across state lines, abuse of process, showing criminal misconduct, in violation of, Title 18, U.S.C., §§, 371, 241, 242, 1341, 1343, 1344, 1346, 1349, 1951, 1956, 1957, and, 1961, *et seq.*; XLVI § 817.155, TITLE XLVI § 837.02, F.S.; and, Fla. Bar Misconduct – Rule 4-8.4 (a)(b)(c)(d). *See Record.*

<sup>153</sup> Among implicated officers of the Florida Bar, recklessly and knowingly allowing and enabling Florida Bar licensees, known Associates of the CCE, Joshua E. Doyle (Florida Bar No. 25.902), John F. Harkness (Florida Bar No. 123.390), Annemarie C. Craft (Florida Bar No. 520.373), and, Arlene Kalish Sankel (Florida Bar No. 272.981). *See Tavares Sworn Affidavit.*

<sup>154</sup> Among other complaints against licensees Associates of the CCE, see, *e.g.*, Florida Bar Complaints: No.2011-71,18(III); No.2013-70,433(11G); No.2015-70,081(11L); No.2019-12874; No.2019-12875; and, 12877, against criminals Thomas R. Lehman (Florida Bar No. 351.318), Marco E. Rojas (Florida Bar No.940.453), Nelson Slosbergas (Florida Bar No.378.887), Peter F. Valori (Florida Bar No.43.516), Matthew Paul Leto (RFA No.16-7373), and Richard Allen Morgan (RFA No. 16-7371).

## **THE FLORIDA BAR – BACKGROUND**

The Florida Bar (“Florida Bar”) is the integrated<sup>155</sup> bar association for the State of Florida. The Florida Bar currently shows more than 122,000 members, and it is led by a President, a President-Elect, an Executive Director, and a 52-member Board of Governors.

Article V, Section 15 of the Constitution of the State of Florida gives the Supreme Court of Florida exclusive and ultimate authority to regulate the admission of persons to the practice of law and the discipline of those persons who are admitted to practice. The Court performs those official functions through two separate arms: the Florida Board of Bar Examiners, which screens, tests and certifies candidates for admission to the practice, and The Florida Bar, the investigative and prosecutorial authority in the lawyer regulatory process. Neither of these two agencies, nor any of their functions, is supported by state tax<sup>156</sup> 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](http://www.floridabar.org) Mission Statement on October 14, 2023; and;

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

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

“I do solemnly swear:

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

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

<sup>155</sup> See, [The 1949 Decision by the Supreme Court of Florida.](#)

<sup>156</sup> The Florida Bar, although not directly supported by “State or Federal Tax Dollars”, is a beneficiary of, *e.g.*, tax exemptions to pay State and Federal Tax Dollars under its claimed State and Federal tax-exempt status. At this time, Tavares has not found Federal or State Tax Records for The Florida Bar, but only for its affiliated entity, The Florida Bar Foundation, Inc, a Not For Profit Corporation (“Bar Foundation”) (Tax Id. #59-1004604) also, tax-exempt. See [www.sunbiz.org](http://www.sunbiz.org) at Document #702751.

## COUNTS

**Count 361** - 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 362**- 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 363** - 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 364**- 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 365** - The Florida Bar, and its implicated Members, 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 366** - The Florida Bar, and its implicated Members, 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 known criminals using their Florida Bar licenses as guise to commit crimes against, *inter alia*, clients, U.S. citizens, the State of Florida, and the United States of America. The Florida Bar, responding to Tavares' complaints against implicated Florida Bar licensees, further makes repeated false statements in writing to cover up the scheme, depriving, 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, Joseph Horn's ("Horn") Bridgeloan Investors, Inc.'s ("BRIDGELoAN") Transnational Continued Criminal Enterprise ("CCE" or "Criminal Enterprise") has successfully subverted, *inter alia*, the judicial machinery in Florida, and elsewhere they operate, in order to systematically and repeatedly 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 CCE's 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 CCE operates, corrupting courts of law in the United States of America, The Florida Bar, major companies, banks, insurance companies, officers of the courts, politicians, and willing partners, into criminal schemes, benefacting them all with the ill-gotten gains, causing irreparable damages to all 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 shocking schemes and injustice to continue to erode the very fabric of our society, subverting and corrupting all pillars of justice and democracy, as we all need to stop this impunity now, sending a clear and direct message to these shameless criminals 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, upholding the Constitution, protecting citizens, property, and rights from this shameless Transnational Continued Criminal Enterprise, clearly presenting a danger to our society and to our national institutions, and democracy. 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: September 25, 2024

FURTHER AFFIANT SAYETH NAUGHT

/s/ Charles A. Tavares

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