

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

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
1	July 21, 2005	U. S. CODE TITLE 18	Stephen Ames Freeman
2		§ 371 Conspiracy to Defraud the USA &	Marco Emilio Rojas
3		§ 241 Conspiracy Against Rights &	Robert Michael Haber
4		§ 1346 Scheme/Artifice to Defraud &	Nicholas Stanham
5		§ 1344 Bank Fraud &	Nelson Slosbergas
6		§ 1961 <i>et seq.</i> – RICO &	Joseph Horn
7		FLORIDA STATUTES Title XLVI §817.155 - Fraudulent Practices & FLORIDA BAR RULES OF CONDUCT Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Ralph Horn Ricardo Eichenwald Bridgeloan Investors, Inc. Thomas Ralph Lehman LKLS+G, LLP Jerry M. Markowitz Ross Robert Hartog Markowitz Davis Hartog, <i>et al.</i> The Bank of New York Mellon The Continued Criminal Enterprise

On July 21, 2005, a Transnational Continued Criminal Enterprise¹ (“Criminal Enterprise” or “CCE”), entraps unsuspecting client² and borrower Charles Tavares (“Tavares”) in a \$7 million dollars sham loan, [maturing on August 1, 2007](#), for Tavares to purchase, for a total of about \$14.3 million dollars, a certain 9 Acres Riverfront property in Miami, Florida (“Miami River Property”), from an auction in a bankruptcy case³ at the U.S. Bankruptcy Court in Miami, FL. The Sham Loan is provided by [Bridgeloan Investors, Inc., a Florida corp.](#) (“BRIDGELOAN”) and Mellon United National Bank, N.A. n.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”) furthering an underlying scheme to extort Tavares of all properties and rights. Unbeknownst at the time, and never disclosed, Tavares’s attorneys Freeman, Haber, Rojas, *et al.*, representing Tavares’s companies Miami River Park Marina, Inc., a Florida corp. (“MRPM”) (Tax Id. #20-3168472), Brickell Village One, LLC, a Florida L.L.C. (“BV One”) (Tax Id. # 58-26748040, and 2147 S.W. 8 Street, LLC, a Florida L.L.C. (“2147”) (Tax Id. #59-3768934), are partners of BRIDGELOAN, and with Horn, Ralph, Eichenwald, Slosbergas, *et al.*, are all Associates of the CCE. The CCE’s scheme to deprive and extort Tavares of all properties and rights is predicated on conflicted representations

¹ The CCE is comprised of reckless attorneys, among others, [Stephen Ames Freeman](#) (“Freeman”) (Florida Bar No. 146.795), [Nelson Slosbergas](#) (“Slosbergas”) (Florida Bar No. 378.887), [Robert Michael Haber](#) (“Haber”) (Florida Bar No. 131.614), [Marco Emilio Rojas](#) (“Rojas”) (Florida Bar No. 940.453), and [Nicholas Stanham](#) (“Stanham”) (Florida 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 corporation (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 corporation](#) (Tax Id. #86-3280908), and [Bridgeinvest, LLC, a Florida limited liability company](#) (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 criminal schemes with absolute impunity, undermining the rule of law and our democracy. See 18 U.S.C.A. § 1961(4) (West 1984), stating, “An ‘enterprise’ is defined as

by the CCE's attorneys falsely pretending for more than 12 years to represent client Tavares' interests, when in truth and in fact, at all relevant times, they are furthering the CCE's schemes to deprive and extort unsuspecting Tavares, the United States, *et al.* Once the CCE embeds Associates around the victims, they launch the schemes, whereas the clients never see it coming, nor have anywhere to go since they are unsuspectingly surrounded by the CCE's Associates. In 2004, Tavares, after extensive due diligence, decides to pursue the purchase of a certain 9 Acres Miami Riverfront Property⁴ (the "Miami River Marina"), as Tavares believes Tavares can take the value for the property to over of \$100 million, due to its size, desirable Riverfront, Marina component, proximity to UM/Jackson Medical Center, and its location between Downtown and MIA Airport. Tavares agrees to allow Tavares' Brazilian investor Romulo Pina Dantas ("Dantas"),⁵ to be Tavares' sole investor in the project despite the fact Tavares at the time has more equity available⁶ from other investors than needed to buy the Miami River Marina property all cash. In March 2005, Tavares, represented by his attorneys Freeman, Haber, and Rojas at FHRS,⁷ with Bankruptcy specialized attorney Thomas R. Lehman ("Lehman") (Florida Bar No. 351.318), referred to Tavares by Rojas, starts working towards bidding for the property and related legal issues. At the end of March 2005, Tavares flies to Brazil to seal the deal for Dantas to be Tavares' sole investor in the Miami River Marina Project with a \$6 million cash investment in the project, and the balance to be provided by financing from BRIDGELoAN, and \$1.5 million second mortgage with Tavares' investor

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

² In 1992, Tavares is first introduced to attorneys Freeman, Haber, Slosbergas, Rojas, *et al.*, by real estate developer Eduardo Avila ("Avila"), while Tavares is working with Avila in the development of the St. Louis Condominium at 800 Claughton Island Drive, Brickell Key, Miami, Florida 33131, a project by Spaniard investor Jose Luis Llannes at Storta, Gonzaga et Suisse Group, Ltd., Inc., a Florida corp. ("Storta et Suisse Group") (Tax Id. #65-0479013) (www.sunbiz.org "SUNBIZ" Doc. #P94000020354).

³ In 2004, after extensive due diligence, Tavares starts to pursue the purchase of the 9 Acres Miami River Property, at the time, the largest continuous riverfront property in Miami, being sold by the Bankruptcy Court's Trustee Alan Goldberg ("Trustee Goldberg"), represented by Jerry M. Markowitz ("Markowitz") (Florida Bar No. 182.420), and Ross Robert Hartog ("Hartog") (Florida Bar No. 272.360), at Markowitz, Davis, Ringel and Trusty, P.A n.k.a. Markowitz Ringel Trusty + Hartog, P.A. ("MRTH"), with hundreds of bidders, including Related Group, and other developers. See In Re. Bankruptcy Chapter 11: Consolidated Yacht Corp., a Florida Corp. (Tax Id. #65-0242347) (SUNBIZ Doc. #S28046), Bankruptcy Case No. 2002-19483-BKC-RAM.

⁴ The Miami River Property, a former Boat Marina at 1142 NW 21 Avenue, 1975, 1995, and 2051 N.W. 11 Street, and 2000 NW 11 Street, Miami, FL 33125, is comprised of several lots, totaling about 9 Acres of (392.040 FS or 36,515 M2) of land and thousands of feet of Riverfront, making it the largest Riverfront property in Miami-Dade County, FL, see Folios #01-3134-101-0010; 01-3134-042-0040; 01-3134-042-0050; 01-3134-049-0090; and 01-3134-048-0170.

⁵ Dantas and Marcos Jose Bezerra Menezes ("Marcos Menezes") are Tavares' partners in the BV One project owning buildings in a 2.4 Acres Brickell West area, each owning about 1/3, and both agree to leverage BV One in the MRPM deal, indemnifying Tavares financially, and handing all their shares on Brickell BV One to Tavares, appraised at the time, about \$20 million, and the MRPM's value of \$55 million, a combined \$75 million for the sham \$7 million BRIDGELoAN/BNY Mellon loan. Rojas, and FHRS' attorneys also represent, since 2003, Dantas, Marcos Menezes, BV One, *et al.*, in willful conflict of interest to extort the clients.

⁶ Because Tavares' superb and impeccable track record in delivering great returns to investors for more than 10 years, Dantas invests in Tavares' Miami River Marina project even before seeing the property, which Dantas visits in for the first time in 2006.

⁷ To further the scheme, Rojas refers CCE's Associate Lehman to represent Tavares before the Bankruptcy auction, and Freeman recommends BRIDGELoAN as a lender for the additional funding to purchase the Miami River Marina property, and willfully allows BV One property mortgaged as additional collateral, charging \$10,000 legal fees for the sham representation.

Francisco Mesa Schuler⁸ (“Francisco Mesa”) at Valsana Investment, Inc., a Panama corp. (“VALSANA”). On July 21, 2005, the \$14.3 million purchase of the Miami River Marina property closes, showing Rojas signing⁹ on behalf of Tavares’ MRPM, BV One, and 2147, and representing Tavares personally as Guarantor in the \$7 million Sham Loan closing with sham lender BRIDGELoAN and Mellon United National Bank, N.A. n.k.a. The Bank of New York Mellon¹⁰ (“BNY Mellon”), as BRIDGELoAN uses funds from, e.g., BNY Mellon. Trustee Goldberg represents seller, under Chapter 11, Consolidated Yacht Corp. The record shows the Sham Loans with fatal conflicts of interest against Tavares are vitiated by fraud.

THE TRANSNATIONAL CONTINUED CRIMINAL ENTERPRISE’S (“CCE”) BACKGROUND

THE CCE’S FOUNDERS

1. [Stephen Ames Freeman](#)¹¹ (“Freeman”) (Florida Bar No. 146.795)
2. [Robert Michael Haber](#)¹² (“Haber”) (Florida Bar No. 131.614)
3. [Nelson Slosbergas](#)¹³ (“Slosbergas”) (Florida Bar No. 378.887)
4. [Joseph Horn](#)¹⁴ (“Horn”) (Florida Driver License No. H650-480-53-167-0)
5. [Ralph Horn](#) (“Ralph”)
6. [Ricardo Eichenwald](#)¹⁵ (“Eichenwald”)

⁸ Rojas to extort, also willfully represents Francisco Mesa in related legal matters in fatal conflict since at least 2003, to this day, and Rojas has Rojas’s office Janitor to falsely sign a Subordination of Loan from Montevina Financial, Inc. B.V.I. to BRIDGELoAN.

⁹ The Closing is scheduled for a date Tavares is out of the country, FHRS’s attorneys represent Tavares and Tavares’s Companies.

¹⁰ For unknown motives at the time, BNY Mellon is used as the “biggest investor” on Tavares’ loan for the MRPM, and is now known that BNY Mellon’s \$2.5 million is sent to FHRS’s Trust Account used to money launder, e.g., \$461 Million drug moneys.

¹¹ Freeman is admitted by the Florida Bar in 1972 and quickly creates various schemes, among others, trust account and financing schemes to launder funds and perpetrate tax frauds through his law firms, e.g., Freeman Haber Rojas & Stanham, LLP’s (“FHRS”) trust accounts at Banco Espirito Santo in Miami, FL (“BES”), *et al.*, using FHRS’s office cleaners – immigrants from Russia and Belarus (“Janitors”), among others, Yuzik Baskin (“Baskin”), Bella Itkina (“Itkina”), and Inna Maltseva (“Maltseva”), to systematically falsely sign sham corporate and loan documents for domestic and foreign corporations to further money laundering, tax evasion, allowing the CCE to avoid accountability. In May 1995, FHRS starts money laundering about \$461 million dollars of illicit and drug moneys for Peruvian Drug Kingpin Fernando Zevallos Gonzales (“Fernando Zevallos”) using the same schemes through FHRS’s Trust Accounts at BES. After the United States Treasury Department and law enforcement agencies close in on the schemes, Freeman flees to Israel, and Zevallos Gonzales is imprisoned in Peru for narcotics trafficking. On March 3, 2006, Freeman signs an Admission of Minor Misconduct for Trust Account Violations with the Florida Bar, enabling Freeman to commit bigger crimes. See *The Florida Bar Complaint v. Stephen A. Freeman*, Case No. 2005-70,276(11).

¹² Haber is admitted by the Florida Bar in 1971, and, at all relevant times, is a co-Founder and Associate of the CCE.

¹³ Slosbergas is admitted by the Florida Bar in 1983, and is a co-Founder and chief architect of the CCE, specializing in Corporate offshore and Brazilian clients, perpetrating massive global schemes of money laundering and tax frauds.

¹⁴ Horn is Ralph’s brother, and is also related to Elie Horn, the founder and controller of Cyrela Brazil Realty S.A. (“CYRELA”) (Stock OTCMKTS: CYRBY), and founder/managing director for Brazil’s Ourinvest Group, sent to Miami, FL, to run the business.

¹⁵ Eichenwald is sent to the USA in 1991 to run Brazil’s Ourinvest Group’s financial businesses, and with Horn in 1992, founded Dartley Securities Limited (Bahamas) and Dartley Bank & Trust Limited (Bahamas) (Collectively “DARTLEY Bahamas”). In 1996, Daniel Citron (“Citron”) leads CYRELA to its IPO and placement of ADR’s in New York. In 1997, Horn Eichenwald Investments, an SEC-registered investment firm is founded. In 1998, Ourinvest is renamed Bridgeloan Investors, Inc., a Florida corp., to, *inter alia*, disguise its money laundering and tax evasion, defrauding billions of dollars in financial instruments for BRIDGELoAN and wealthy Brazilian clients through offshore entities using the USA’s securities and real estate markets for schemes to launder moneys, tax evade and defraud. By December 31, 2016, OURINVEST sells DARTLEY Bahamas to CAINVEST a Cayman Isl. Bank (“CAINVEST Cayman”) a.k.a. COLPATBANCO International Bank a.k.a. Bank COLPATBANCO, a Cayman Bank (“COLPATBANCO Cayman”), a group founded by Charles Cohab at TRISOFT Textil Ltd. (Brazil), now led by Charles Aboulafia (“Aboulafia”).

GENESIS & EVOLUTION OF THE TRANSNATIONAL CCE

On June 24, 1981, Freeman, Helaine Freeman, and Martin Freeman founded Freeman Financial Corp., a Florida corp. (“Freeman Financial”) (Tax Id. #59-2107178) (SUNBIZ doc. #691717). On September 10, 1990, Ourinvest International Corporation, a Florida corp. (“Ourinvest Group”) (Tax Id.#65-0239661) ([SUNBIZ](#) Doc.#L98482) is founded, showing, among others, Horn, Ralph, Freeman and Slosbergas as officers and agents. On December 18, 1991, Freeman and Slosbergas, as Trustees provide a \$335,000 loan to Roy F. Custer, *et al.*, see Miami-Dade County, Florida Clerk’s Record (“[Clerk’s Record](#)”) Book 15317 at page 3055. On April 28, 1992, New Florida International Corporation, a Florida corp. (“Tax Id. #65-0329057) ([SUNBIZ](#) Doc. #V31785) is founded by Freeman and Brazilian Real Estate Developer Jose Mucio Ataide Frois a.k.a. Mucio Athayde¹⁶ (“Athayde”). On May 1, 1992, Wright International Inc., a B.V.I. corp., executes a Mortgage Deed to Freeman and Slosbergas as Trustees, see [Clerk’s Record](#) Book 15513 at page 2226. On May 28, 1992, H-Four Corp., a Florida corp. (Tax Id. #65-0339924), is founded by Horn and showing Slosbergas as Registered Agent, see [SUNBIZ](#) at Doc. #V39549. On July 1, 1992, Freeman’s FCS Enterprises, Inc. a.k.a. Transglobal Corporate Services, Inc, a Florida corp. (“Transglobal”) (Tax Id. #65-0342806) ([SUNBIZ](#) Doc. #V47410) starts its “Corporate Management Services” using, among others, Freeman’s law firm’s Janitors – cleaning their offices at 520 Brickell Key Drive, Suite 0-305, Miami, Florida 33131, to falsely sign as officers of domestic and foreign corporations, documents furthering the CCE’s schemes to defraud the United States of America, *et al.* On September 30, 1992, Signal Holdings Limited, a B.V.I. corp., executes a Mortgage Deed to Freeman and Slosbergas as Trustees, see [Clerk’s Record](#) Book 15672 at page 1731. On March 8, 1993, P.H. Retail, Inc., a Florida corp., executes a mortgage for \$2.5 million to Freeman and Slosbergas as Trustees, see [Clerk’s Record](#) Book 15838 at page 3706. On October 12, 1994, Horn and wife Lori Simon Horn (“Lori” or “Lory”), execute a mortgage for \$2 million for their homestead property at 330 Arvida Parkway, Coral Gables, Florida 33156-2317 (“Gables Estates” property) ([Folio](#) #03-5105-002-0130) to “lenders”¹⁷ Freeman and Slosbergas as Trustees. On June 1995, Freeman incorporates Merlot Enterprises, Inc., a Florida corp. (Tax Id. # 65-0593389) ([SUNBIZ](#) Doc. #P95000044981), showing Freeman’s Office’s Janitor Maltseva as

¹⁶ Athayde is shown on various Florida companies with Freeman, *e.g.*, New Florida Holdings, Inc., a Florida corporation (Tax Id. #65-0374936) ([SUNBIZ](#) Doc. #P92000008717), and New Florida Mortgage Corp., a Florida corp. (No Tax Id.) ([SUNBIZ](#) Doc. #P04000071752), and, with Lehman, *e.g.*, ZPO, Inc, a Florida corporation (Tax Id. #65-0329057) ([SUNBIZ](#) Doc. #V31785); New Florida Properties Corporation, a Florida corp. (Tax Id. #V42106) ([SUNBIZ](#) Doc. #V42106); and, New Florida Investments, Inc., a Florida corporation (Tax Id. #65-0653045). Lehman represented Athayde’s New Florida Properties in Miami Bankruptcy proceedings before Judge A. Jay Crystol (“Blue & Green Diamond Condominiums Bankruptcy”).

¹⁷ The sham mortgage from Freeman and Slosbergas as Trustees is set up to disguise the true origin of Horn’s moneys and further allow Horn to “earn” interest on his own money, deducting the interest payments to unduly minimize payments to the United States Department of the Treasury (“IRS”) on their tax returns, showing to Horn how Freeman and Slosbergas’ sham mortgages can be developed into a Global scheme defrauding the United States of America, banks, *et al.* On June 10, 1992, H-Four purchases from James Vaughan and Megan Vaughan, the Gables Estates Property, for \$2,115,000 with a \$1,115,000 purchase money mortgage, see Miami-Dade [Clerk’s Record](#) Book15556 at page 1194-1195. On October 12, 1994, Horn’s H-Four transfers for \$3,000,000, the Gables Estates Property to Horn (Florida Driver License No. H650-480-53-167-0) and wife Lori (Florida Driver License No. H650-539-55-6840) for \$3,000,000, see Warranty Deed at [Clerk’s Record](#) 16546 at page 1996, with a sham mortgage of \$2,000,000 from Freeman and Slosbergas as Trustees, see [Clerk’s Record](#) 16546 at page 1997 – 2002. On December 12, 1995, Freeman and Slosbergas file a satisfaction of the sham mortgage, see Record Book 17033 at page 3890. On January 8, 2001, Horn, and wife Lori, signing as Lory Simon Horn, execute a mortgage – revolving credit line, with City National Bank of Florida, a N.B.A. (“City National”) for \$2 million, see [Clerk’s Record](#) Book 19946 at pgs. 3119 – 3126. On June 24, 2021, Horn and Lori execute a Corrective Quit Claim Deed, prepared by [Michael J. Freeman](#) (“Michael Freeman”) (Florida Bar No. 155.834) for their Gables Estates property as “Lory Y. Horn,” see [Clerk’s Record](#) Book 32601 at pgs. 1989 – 1990.

President and Director, and Freeman as Assistant Secretary and Registered Agent. On November 28, 1995, Sergio Vilhena and wife Kathy Vilhena [deeds their homestead property at 10900 Snapper Creek Drive, Miami, Florida 33156](#) (Folio #30-5107-004-02 10) to [Alan Samuel Fine](#)¹⁸ (“Fine”) (Florida Bar No. 385.824) and wife Victoria Corrigan Fine (“Victoria”), see [Clerk’s Record](#) Book 17008 at pg. 1293. On May 16, 1996,¹⁹ Horn, Eichenwald, Ralph, Freeman, and Slosbergas, founded Ourinvest Mortgage Corporation, a Florida corp. (“Ourinvest” or “BRIDGELoAN”) n.k.a. Bridgeloan Investors, Inc., a Florida corp. (Tax Id. #65-0665516) ([SUNBIZ](#) at Doc. #P96000042015). On June 17, 1996, Haber, as Vice President of Storta et Suisse Group executes a \$225,000 mortgage prepared by Slosbergas, to lenders Freeman and Slosbergas as Trustees, see [Clerk’s Record](#) Book 17241 at pgs. 3072–3085. On October 29, 1996, Renato Glass, director of Signal Holdings Limited, a B.V.I. company, executes a \$1,000,000 mortgage prepared by Slosbergas, to BRIDGELoAN, see [Clerk’s Record](#) Book 17421 – 1838. On December 12, 1996, [Andrew Clifford Hall](#) (“Andy Hall”) (Florida Bar No. 111.480), files on behalf of Horn, a Notice of Voluntary Dismissal on *Joseph Horn v. Azimut, S.p.A., et al.*, [Case](#) No. 1996-20576-CA-11, in Miami-Dade County, Florida. On January 14, 1997, Fernando F. Toledo as attorney-in-Fact of Woodstone Investments Incorporated, a B.V.I. corp., executes a \$135,000 mortgage prepared by Haber and notarized by Slosbergas, to BRIDGELoAN, see [Clerk’s Record](#) Book 17506 at pgs. 0706 – 0719. On June 17, 1997, Horn Eichenwald Investments, Corp, a Florida corp. (“H2A”) is founded, and showing directors Horn, Ralph and Eichenwald, and [Daniel Ades](#) (“Ades”), and showing Slosbergas’ NS as its Registered Agent. On May 27, 1998, Slosbergas files with SUNBIZ, Articles Amending the list of directors and officers of FLICK Mortgage Investors, Inc., a Florida corp. (“FLICK Mortgage”) (Tax Id. #59-2936881) ([SUNBIZ](#) Doc. #K70965), showing, directors Jeffrey B. Flick (“Flick”), Sandra Fick (“Sandra”), Francisco Ruiz (“Ruiz”), Horn, Eichenwald, and Thomas E. Freiwald. On June 15, 1998, Elias Antonio Barreto²⁰ (“Barreto”), signs as vice president of SECISA B.V.I. Corp., a British Virgin Islands corp. (“SECISA, B.V.I.”), *inter alia*, an Assignment of mortgage for the property at 5959 SW 71 Street, Miami, FL 33143 (Folio # 09-4025-011-0240) (“Hotel Vila”), and an “*Individual Holder’s Statement Pursuant to Reg. Aa.. 9999-5, A-24 and A-27 Regarding Ownership of Issuer of Debt Obligations Qualifying for Portfolio Interest Exception Under Section 871(h) of the IRS Code of 1986*”, to BRIDGELoAN for \$2.3 million. On July 31, 1998, Freeman and Slosbergas, as Trustees, assign a \$1,250,000 loan to BRIDGELoAN, see [Clerk’s Record](#) Book 18224 pgs. 0413-0414. On February 17, 1999, [John S. Tenenholtz](#) (“Tenenholtz”) (Florida Bar No. 649665) at FHRS prepares & files with [SUNBIZ](#), articles of incorporation of Prestige Auction, Inc.,

¹⁸ At the time, and for many years, Fine is an attorney at Freeman’s law firm, together with, among others, Freeman, Haber, Tenenholtz, Rojas, Stanham, and Slosbergas, and Vilhena is a client of the firm, see, *e.g.*, Vilhena’s Uno Network, Inc., a Florida corporation (“UNO Money Remittance”) (Tax Id. #65-0548003) ([SUNBIZ](#) Doc. #P94000001207).

¹⁹ In 1995, at a time when Freeman is handling more than 1.000 offshore entities and Slosbergas is handling over 1.500 offshore entities, the attorneys, among others, Freeman, Slosbergas, and Fine, start splitting in different cells in order to avoid detection from regulators and law enforcement, and to allow entrapment of more unsuspecting clients by a larger number of the CCE’s “law firm cells” furthering the criminal schemes. On May 26, 1995, Slosbergas at Freeman’s law firm, founded NS Corporate Services, Inc., a Florida corp. (“NS”) (Tax Id. # 65-062-280) ([SUNBIZ](#) Doc. #P95000041594) to further the schemes.

²⁰ On May 14, 1990, Barreto, on behalf of SECISA International Ltda., Inc., a Florida corp. (“SECISA USA”) purchased the Hotel Vila Property, see [Clerk’s Record](#) Book 1455 at pg. 153. On March 22, 1991, Barreto as Vice President, together with Luis S. Barreto (“Luis Barreto”) as President of SECISA USA, executes a \$2.3 million mortgage for the Hotel Vila Property with SECISA B.V.I., signed by Barreto as President of SECISA B.V.I., see [Clerk’s Record](#) Book 14950 at pgs. 1926 – 1964. See also, Loan modifications for SECISA loans at [Clerk’s Record](#) Book 15513 at pgs. 3161 – 3166; *id.* 15826 at pgs. 0756 – 0770; and *id.* 16548 at pgs. 3531 – 3549. On May 24, 2002, SECISA USA, in a Warranty Deed prepared and witnessed by Slosbergas, deeds the Vila Hotel Property to Vila Residences, LLC, a Florida L.L.C. (“Vila Residences”) (Tax d. #04-3670419) ([SUNBIZ](#) Doc. #L02000010254).

a Florida corp. (“Prestige”) (Tax Id. # 65-0894683) ([SUNBIZ](#) Doc. #P980000 15532). Prestige shows Tennenholtz, Freeman, and their Janitor Baskin as directors and officers, and Ocean’s Edge Limited as shareholder. On May 27, 1999, Maltseva, an immigrant from Russia and a Janitor cleaning Freeman’s offices, signs as president of Bristol, Inc., a Florida corp.²¹ (“Bristol”) (Tax Id. # 65-0384626) ([SUNBIZ](#) Doc. #P93000005720) a Second Note and Mortgage Modification (“2nd Loan Modification”), see [Clerk’s Record](#) Book 18654 at pgs. 0429 – 432, relating to a \$1.1 million loan to Bristol from BRIDGELOAN, charging 13.5% interest, secured by properties in Osceola County, FL, see [Osceola County’s](#) Clerk Records Book 1307 at pg. 2720; & *Id.* 1509 at pg. 768. The loan documents are prepared by Slosbergas, signed by Peter D. Beebe (“Peter Beebe”) as president and Slosbergas as Vice President of BRIDGELOAN, witnessed by Haber, and notarized by Teresita B. Castro a.k.a. Teresita Bregolat (“Teri”) and Hildie-Lorie Aristondo²² (“Aristondo”). Here, the CCE’s Associates use several of their “Corporate Maintenance Services”²³ to further the schemes, among others, Multi Corporate Services, Inc., a Florida corp. (“Multi” or “CCE’s Corporate Services”) (Tax Id. #04-3680070) ([SUNBIZ](#) Doc. #P02000060 498). On December 10, 1999, XYZ, Corp., a Florida corp. (“XYZ Corp.”)(Tax Id. #65-1055275) ([SUNBIZ](#) Doc. #P99000107 161) is founded showing Associates Horn, Ralph, Eichenwald, Freeman, Haber, Beebe

²¹ Miami-Dade County [Clerk Records](#) show that: On November 20, 1995, in a document prepared by Stanham at FHRS, John F. Lowndes, individually and as a Trustee, signs a Partial Release for a \$1.5 million loan relating to a property in Osceola County, Florida, see [Osceola County’s](#) Clerk Records at Book 1109 at pg. 252; On February 1, 1998, Maltseva, as president of BRISTOL, signs a Mortgage Modification relating to loan of \$1.1 million, see [Osceola County’s](#) Clerk Records at Book 1307 at pg. 2720, with Freeman and Slosbergas as Trustees, as lenders, and showing Aristondo and Teri notarizing the signatures, see [Clerk Records](#) at Book 1797 at pgs. 3901 – 3902; On May 5, 1999, Maltseva, as president of BRISTOL, signs the 2nd Loan Modification with BRIDGELOAN, signed by Beebe as president and Slosbergas as vice president, witnessed by Haber, Guevara, and notarized by Teri; On January 23, 2002, 2004, a \$2 million Second Mortgage, showing collateral property at 7000 Island Boulevard Island, Unit 906, Aventura, Florida 33160 ([Folio](#) #28-2210-084-1640), is signed by borrowers BRISTOL, showing an address at 520 Brickell Key Drive, Suite 0-305, Miami, FL 33131 (“FHRS’s Offices”), and Zanzibar Severo as president of Charlton Business Corporation, a British Virgin Islands corp. (“CHARLTON BVI”) with [INTERCREDITBANK N.A.](#) (“INTERCREDITBANK”), and showing, *inter alia*, an statement by [Robin A. Lukacs](#) (“Lukacs”) (Florida Bar No. 521.787) that, “*This mortgage is given as additional collateral to secure obligation with mortgagee which is being secured by a Mortgage on a property located in Osceola County, Florida. Documentary Stamps and Intangible Taxes incident to the obligation secured by this mortgage were affixed to the mortgage recorded in Osceola County, Florida,*” see [Clerk Records](#) at Book 22041 at pgs. 1756 - 1787; On August 12, 2005, INTERCREDITBANK assigns BRISTOL’s \$2 million mortgage to Freeman as Trustee under the Flamingo Fountains Trust dated August 3, 2005, with an address at FHRS’s Offices, see [Clerk Records](#) at Book 23690 at pgs. 2845 – 2846, and, see also, Flamingo Fountains (Trademark Registration) ([SUNBIZ](#) Doc. #T94000000242), owned by BRISTOL with an address at FHRS’s Offices; and, on September 1, 2005, Freeman files a Satisfaction of the \$2 million mortgage, see [Clerk Records](#) at Book 23744 at pg. 2271. Bristol shows, at all relevant times, having Freeman, Slosbergas, Rojas, Stanham, Samuel Haven (“Samuel Haven”), and FHRS’s offices’ Janitors, among others, Baskin, Maltseva, Nazeyda Gaysina (“Gaysina”), as officers and directors, and Raymond Investments Corp, a British Virgin Islands company (“Raymond Investments B.V.I.”) as its Sole Shareholder.

²² Teri, Aristondo, and Ana C. Guevara (“Guevara”) and Frances Ortiz, are paralegals Associates of the CCE, working together with Freeman, Slosbergas, Haber, Rojas, Stanham, *et al.*, continuously perpetrating massive fraudulent schemes for decades.

²³ In addition to the CCE’s vast network of offshore Corporate Services, some of other CCE’s Corporate Services includes, *e.g.*, Multi Corporate Administration, Inc., a Florida corp. (Tax Id. #65-0342 806) ([SUNBIZ](#) Doc. #P03000058439); Multi Corporate Group, Inc., a Florida corp. (Tax Id. #20-2040504) ([SUNBIZ](#) Doc. #P04000 168686); Transglobal Corporate Services, Inc., a Florida corp. (Tax Id. #65-0342806) ([SUNBIZ](#) Doc. #V47410); Transglobal Corporate Administration, Inc., a Florida corp. (Tax Id. #65-0750045) ([SUNBIZ](#) Doc. #P97000020588); Transglobal Corporate Administration, LLC, a Florida L.L.C. (Tax Id. #90-0128925) ([SUNBIZ](#) Doc. #L03000052836); Transglobal Corporate Services, LLC, a Florida L.L.C. (Tax Id. #42-1612635) ([SUNBIZ](#) Doc. #L03000052837); Transglobal Corporate Consultants, LLC, a Florida L.L.C. (Tax Id. # NONE) ([SUNBIZ](#) Doc. #L07000114749); NS Corporate Services, Inc., a Florida corp. (Tax Id. #65-0620280) ([SUNBIZ](#) Doc. #P95000041594); and, [NS Company Services, LLC](#), a Florida L.L.C. (Tax Id. #87-3990956) ([SUNBIZ](#) Doc. #L21000442789), associated to [Boulder Group](#) f.k.a. AMS Financial Group.

and FHRS's Janitor Baskin as directors and officers. On August 8, 2000, Airplane Holding Corporation, a Florida corp. ("Airplane Corp.") (Tax Id. #NONE) ([SUNBIZ](#) Doc. #P00000075145) is founded by Freeman, with FHRS's Janitor Maltseva as director & president. On November 8, 2000, a Final Judgment for over \$1 million is entered in Miami-Dade County, FL, in the styled-action *BRIDGELOAN Investors, Inc. f/k/a Ourinvest Mortgage Corporation, a Florida corp. v. Alto Enterprises East Coast Corporation, a Florida corp.*, [Case](#) No. 2000-16609-CA-01, showing BRIDGELOAN represented by Fine. The CCE uses Ourinvest continuously to further schemes in securities, bank and mortgage frauds and tax evasion, laundering of billions of dollars through the United States of America, in the Cayman Islands, and in the Bahamas.

BANIF SCHEMES AND DEVELOPMENT OF THE CCE's GLOBAL SHADOW EXCHANGE-MARKET

On November 11, 2000, BANIF Financial Services, Inc., a Florida corp.²⁴ ("BANIF Financial" or "BANIF") (Tax Id. #65-1059887) ([SUNBIZ](#) Doc. #P00000110760) is incorporated by [Paulo Cesar de Miranda](#) a.k.a. Paulo Miranda²⁵ ("Paulo Miranda") (Brazil OAB-RJ No. 25.208), showing among other directors, officers, and registered agents, [Hugo Barreto Del Priore](#)²⁶ ("Del Priore"), Alvaro Cortes ("Cortes"), Sergio de Almeida Capela ("Capela"), [Edward DeCaso](#) ("DeCaso"), [Artur Manuel da Silva Fernandes](#) ("Artur Fernandes"), [Horacio Cruz](#) ("Cruz"), and Slosbergas NS Corporate Services. The record shows that the CCE corrupted BANIF's officers, directors and agents, and eventually hijacked BANIF's operations in various locations, including among others, in the United States of America, South America, Europe, Africa, and Asia, giving the CCE an unprecedented access to well-established banking, securities, and real estate structures to further the schemes in a global scale, allowing the CCE to exponentially expand its intercontinental money laundering, tax evasion, tax frauds, banking and mortgage, and portfolio tax-free operations, with a vast network of potential new Associates. Because of the hijacking of BANIF by the CCE, and the swindling of its securities and real estate portfolio, including the more than \$800 million dollars under custody at UBS Bank, and moving real estate assets, credits, tax credits, and other valuable considerations to Associates of the CCE, BANIF eventually [collapses](#) in December 2015, causing more than \$3 billion dollars in losses to governments, thousands of account holders, and many retirees, while the Associates of the CCE buy properties on, for example, ultra exclusive Fisher Island and Key Biscayne, Florida. Then, after helping to cause the collapse of BANIF, they are still using BANIF's structure around the world to further the ongoing schemes, tax defrauding the United States with sham tax deductions and transfers of assets, and showing the development of a sophisticated stealthy Global Shadow Exchange-Market ("Shadow Market") used for tax and law avoidance, and to exchange assets with the CCE's counterparts without detection, to bribe politicians, judges, law enforcement, *et al.*, with interests in securities and real estate, guaranteeing power and impunity for the Associates wherever they operate, successfully subverting national institutions, undermining the rule of law and democracy.

²⁴ BANIF was part of [BANIF Financial Group](#) (traded at EURONEXT: BNF), a Portuguese conglomerate with a banking, securities, and other financial services presence in Europe, United States of America, South America, Africa and Asia, with assets, at the time, of more than \$15 billion dollars, and more than 5,400 employees worldwide.

²⁵ Paulo Miranda is a Brazilian attorney based in Miami, FL, at the time at [Akerman Senterfitt, LLP](#) ("Akerman Law"), and Public Records show an address at 7936 Fisher Island Drive, Miami Beach, FL 33109 ([Folio](#) #30-4210-007-0300), and is father of [Bruno Martins Miranda](#) ("Bruno Miranda") (CRD #3130020) at [UBS Financial Services, Inc.](#) ("UBS Financial") (CRD #8174) in Coral Gables, Florida, and an earlier apprentice of [Julio Emilio Mendoza-Riglos](#) ("Julio Mendoza") (CRD#2537738).

²⁶ Tavares is introduced to Del Priore by Julio Mendoza, as Julio Mendoza was a partner of Tavares in a Kendall Project relating to The Car Wash Concept that Tavares developed. Because of Tavares outstanding record of very successful real estate projects and investments, Del Priore also invests with Tavares, and introduces, *e.g.*, BANIF's Chairman [Horácio Roque](#), *et al.*

On January 22, 2001, Ole Services, LLC, a Florida L.L.C. (Tax Id. #65-1068705) ([SUNBIZ Doc. #L01000001097](#)) is founded by Ruiz²⁷ and wife [Lucy D. Ruiz](#) (“Lucy”), showing Slosbergas’ NS as registered agent.

THE CCE’S FIRST ATTEMPT TO DEPRIVE, STEAL AND EXTORT TAVARES OF PROPERTIES AND RIGHTS

In 1995, Tavares, to implement his vision²⁸ allowing his large portfolio of qualified Brazilian investors to invest in, what Tavares saw as a great upcoming real estate market in Miami, FL, starts the funding of potential real estate projects through Star Investment Fund, Ltd., a B.V.I. Corp. (“STAR”), incorporated by Tavares’ attorneys Freeman, Slosbergas, and AMS Financial n.k.a. [Bolder Group](#). On March 19, 1998, Tavares’ STAR funds the purchase and the development of the Brickell Premier Project at 218 S.E. 14 Street, Brickell, Miami, Florida 33131(Folio #01-0210-050-2250). On September 20, 2001, Avila signs on behalf of Key Real Estate Development II, Corp., a Florida corp. (“Key Estate II”) (Tax Id.#65-0928326) ([SUNBIZ Doc. #P9800 0017834](#)), a [\\$500,000 mortgage with BRIDGELOAN](#), signed by Slosbergas and Beebe as officers of BRIDGELOAN, and loan documents by Haber, and Tavares’ STAR represented by Rojas at FHRS, see Clerk’s Record Book 19917 pgs. 3711 – 3729, in connection with the development of the Brickell Premier Project (“Brickell Premier”), and State of Florida UCC Financial Statement form, see Clerk’s Record Book 19917 at pgs. 3730–3735. Also, Haber at FHRS represents Tavares’ STAR relating to the Mortgage Subordination Agreement for BRIDGELOAN’s \$500,000 loan to Key Estate II, showing Beebe and Slosbergas signing on behalf of BRIDGELOAN, see Clerk’s Record Book 19926 at pgs. 0252 – 0255. Tavares’ STAR is funding the development of Avila’s Key Estate II for the Brickell Premier Project, starting with the land purchase for \$1.2 million of the Brickell Premier property on March 19, 1998, from Bayhaven Investments, Inc., a Florida corp. (“Bayhaven”) (Tax Id. #65-0677530) ([SUNBIZ Doc. #P96000054322](#)), see FHRS File No. 8682-3 (U.S. HUD Form), showing Rojas at FHRS representing, concurrently, Key Estate II as the mortgagor and STAR as the mortgagee in a \$1.3 million mortgage for the subject Brickell Premier property, see Clerk’s Record Book 18029 at pgs. 2541 – 2555. Freeman at FHRS referred Tavares to BRIDGELOAN for financing, and unbeknownst to Tavares, and never disclosed by Freeman, Slosbergas, Haber, Rojas, Beebe, Horn, Eichenwald or Ralph, they all are longtime partners in BRIDGELOAN, and in many other competing real estate and development companies. Indeed, the conflicted representation of Tavares by his attorneys Freeman, Slosbergas, Haber, and Rojas, is set by design so the Associates can easily entrap the unsuspecting clients and victims, as they surround the victims with Associates of the CCE. Starting in 1992, and at all relevant times, Freeman, Slosbergas, Haber, Rojas, Stanham, and other attorneys at FHRS are representing Tavares personally, and Tavares’

²⁷ Some of Ruiz’s Associated entities, *e.g.*, Promax Investments, LLC, a Florida L.L.C. (“PROMAX”) (Tax Id. #20-2404872) ([SUNBIZ Doc. #L05000018705](#)) with Freeman’s Transglobal as agent; Planet Security USA, LLC, a Florida L.L.C. (“Planet Security”) (Tax Id. #NONE) ([SUNBIZ Doc. #L05000090804](#)) with Freeman as Representative; GREENMAX, LLC, a Florida L.L.C. (“GREENMAX”) (Tax Id. #74-3216013) ([SUNBIZ Doc. #L07000052054](#)), with Ruiz and Ernesto Pereira Lopes Neto a.k.a. Ernesto Lopes (“Ernesto Lopes”) as directors and officers, and Slosbergas’ NS & Greenwich Business Center Condominium Association, Inc., a Florida Not for Profit corp. (“Greenwich Association”) (Tax Id. 26-2698582) ([SUNBIZ Doc.#N0800004305](#)) as agents; US Marina, LLC, a Florida L.L.C. (“US Marinas”) (Tax Id. #45-5262663) ([SUNBIZ Doc. #L12000023526](#)); FCC Overseas, Inc., a Florida corp. (“FCC Overseas”) (Tax Id. #61-1750434) ([SUNBIZ Doc. #P14000094175](#)) with [Robert B. Macaulay](#) (“Macaulay”) (Florida Bar No. 378.445) as registered agent; Mafe Properties, LLC, a Florida L.L.C. (Tax Id. #47-1443619) ([SUNBIZ Doc. #L14000118462](#)); and Drago Overseas, LLC, a Florida L.L.C. (Tax Id. #47-4748800) ([SUNBIZ Doc. #L15000118648](#)) with Macaulay agent. See also Ruiz’s Flick \$300,000 Mortgage to Ruiz & Lucy, prepared by Slosbergas, at Clerk’s Record at [Book 19389 at pgs. 0036-0047](#).

²⁸ Tavares, living and working in the underserved Brickell Area – which at the time had not even a drugstore, or barely any retail, envisioned the development of a vibrant neighborhood by the bay, where people could live, work, and play within a 15-minute walk, by developing World Class Mixed-Use projects in Brickell’s many vacant and underutilized properties at the time.

companies in dozens of deals and companies, including creating Tavares's STAR Fund, and all related documents. Shortly after the purchase of the Brickell Premier property, unusual impediments are created by the CCE's Associates sabotaging the Brickell Premier Project, with unsolicited low offers presented to Avila's Key Estate II, see, e.g., a \$2.4 million offer in June 1998, and \$2.9 Million offer of November 2, 1998, from Mike Mouriz and/or Assigns. The Conflict of Interest²⁹ by the CCE's attorneys and lenders is a central tenet of the CCE's system to stealthily deprive, steal, and extort, by carefully surrounding the prospective unsuspecting victims/clients/borrowers with Associates of the CCE to entrap, gather intelligence, interfere, sabotage, and extort the victims without any recourse. Because the Brickell Premier Property is purchased for a low price, and pre-development workings, and a good development team, with good market conditions at the time, it is now known that, among other things, Tavares' project became a target of the CCE, with Associates already in positions of fatal conflict against Tavares, and are, at all relevant times, interfering and sabotaging the project in order to cause the Project's failure to hijack the project. The market, and Tavares's investors³⁰ from Brazil behind STAR Fund were excited about the prospects for the project. In 2002, Freeman refers Tavares to [ODEBRECHT Contractors of Florida, Inc.](#), a Florida corp.³¹ n.k.a. OEC USA, Inc., a Florida corp. ("ODEBRECHT") (Tax Id. #65-0220703) (SUNBIZ Doc. #L94532), a subsidiary of Brazilian giant conglomerate ODEBRECHT S.A. n.k.a. NOVONOR, as a potential General Contractor for the Brickell Premier Project. After meetings at ODEBRECHT's Coral Gables offices, Paulo Arthur da Costa Ribenboim³² ("Ribenboim") at ODEBRECHT, submits a construction bid for construction costs for the Brickell Premier in the [amount of \\$9,113,336](#).

²⁹ The CCE's Associates, pretending, [for years](#), to be working as Tavares' personal and corporate attorneys, charging Tavares low legal fees in order to keep victim Tavares from going to other uncompromised law firms, and because their true business is not legal representation, but is stealing and extorting clients/victims of their properties and rights, see, for example, some of the invoices from the Associates of the CCE to Tavares: [On May 16, 1995, Slosbergas](#) at FHRs delivering STAR Fund corporate resolutions and charging client Tavares \$10,000; On May 5, 1997, Slosbergas at Slosbergas & Fernandez, LLP, charging Tavares for STAR Fund fees and maintenance of \$3,800; [On July 11, 1997](#), Slosbergas charging client Tavares \$800; On July 30, 1997, Freeman at FHRs invoice #10176 for Matter 8682-3, for \$450, relating to legal services for the purchase Brickell Premier property; [On February 12, 1998](#), Freeman at FHRs invoice #11557 for Matter 8682-4, for \$4,250, relating to Freeman's services with Fund revisions and calls; [On May 17, 1999](#), Freeman at FHRs invoice #13768 for Matter 8682-9, for \$350, relating to meetings with Tavares' investors; and [Rojas](#) at FHRs invoice of [March 24, 2000 for \\$1,200](#) relating to formation of a Tavares' company, showing the CCE's "attorneys" furthering same schemes together. On September 30, 2002, the BRIDGELOAN loan is paid off, see Clerk's Record Book 20699 at pg. 2855, with a new \$725,000 loan from PINETREE Financial Services, Inc., a Florida corp. ("PINETREE") (Tax Id. #65-0951795) (SUNBIZ Doc. #P99000078094), see Clerk's Record Book 20699 at pgs. 2824 – 2839. On October 28, 2002, [Erica L. English](#) ("English") (Florida Bar No. 599.328), at [Katz Barron Squitero & Faust](#) ("Katz Barron"), files, on behalf of Coastal Construction of South Florida, Inc., a Florida corp. ("Coastal"), a \$90,000 lien, relating to site work and test piling for the foundation of the building, for the Brickell Premier property, see Clerk's Record Book 20771 at pg. 0288.

³⁰ On March 7, 2000, Tavares' STAR Fund issues three (03) shares of \$50,000 each, for a total of \$150,000, to Principal Investments, Ltd., a Bahamian corporation ("Principal Bahamas"), a company owned by Paulo Henrique Tavares de Melo ("Paulo Melo"), introduced to Tavares by Julio Mendoza, a Vice President at UBS Coral Gables, FL. Paulo Miranda, then at Greenberg Traurig Law, represents Principal Bahamas, signing the subscription of STAR. Paulo Miranda is a former director of the Brazilian-American Chamber of Commerce of Florida, Inc. (SUNBIZ Doc. #760815), showing also Ruiz as Vice President.

³¹ [ODEBRECHT](#), one of Brazil's biggest conglomerates, was involved in construction of major projects, oil and gas, and started doing projects in Iraq, Africa, Latin America, and eventually entered in United States construction sector in Florida, Texas, and California. ODEBRECHT, from 2001, until it was [indicted](#) by the U.S. Dep. of Justice, engaged in a massive and unparalleled bribery and bid-rigging scheme for more than a decade. During that time, Odebrecht paid approximately \$788 million in bribes to government officials, their representatives, and political parties in a number of countries in order to win business.

³² The [Clerk Records](#) at Book 18001 pg. 2604, shows Slosbergas representing Ribenboim and wife Luciana Pinheiro Ribenboim in the \$600,000 purchase of Ribenboim's home at 570 Ridgewood Dr., Key Biscayne, Florida 33149 ([Folio #24-5205-002-0300](#)).

On June 10, 2002, because of systematic interferences and sabotaging³³ of the Brickell Premier Project by, at the time, unknown parties, Tavares finds a buyer for the Brickell Premier Project for \$6.3 million, bypassing Avila, assuring Tavares' investors return of moneys and a considerable profit. On December 16, 2002, Emerald Development L.C., a Florida L.L.C. company ("EMERALD") (Tax Id. #41-2046208) (SUNBIZ Doc. #L02000014349) closes on the purchase of the Brickell Premier Project with Key Estate II. Then, Tavares believing at the time that was solely Avila that was sabotaging the Brickell Premier, part ways with Avila's development ventures, pursuing independent developments of other projects.

On February 26, 2002, BANIF Mortgage Company, a Florida corp.³⁴ ("BANIF Mortgage" or "BANIF") (Tax Id. #32-0006395) (SUNBIZ Doc. #P02000022068) is founded, showing, *e.g.*, officers and directors Del Priore, Cortes, Capela, DeCaso, Cruz, Marco Antonio de Souza ("De Souza"), *et al.*, and Slosbergas' NS Corporate as registered agent. On May 24, 2002, BANIF-Banco Internacional de Funchal (Cayman) Ltd. ("BANIF CAYMAN" or "BANIF"), issues a \$485,000 loan to IPE Investments, Ltd., a Cayman Islands corp.³⁵ ("IPE Cayman") to purchase for \$500,000, condo unit #3202 at 808 Brickell Key Drive, Miami, FL ("Tequesta 2 Condo") (Folio #01-4206-059-0670), Paulo F. M. Del Priore ("Paulo Del Priore") signing as director of borrower IPE Cayman, and Valdemar B. Lopes ("Valdemar Lopes") on behalf of lender BANIF CAYMAN, witnessed by [Fernando Mota Mendes](#) ("Mendes"), see [Clerk's Record](#) at Book 204421 pgs. 082-0105. On May 1, 2003, BANIF CAYMAN issues a \$250,000 mortgage to Valdemar Lopes and wife Idalia Maria Lopes, *et al.*, with Slosbergas notarizing signatures of Valdemar Lopes, *et al.*, *Id.* 21239 pgs. 2224-2246, and on Deed of Unit 1412 at 801 Brickell Key Drive, Miami, FL, *Id.* 21239 pgs. 2221 - 2223.

On February 28, 2002, Horn purchases a condo at 14970 SW 48 Terrace, Miami, FL 33185 ("Meadow Condo") (Folio #30-4921-012-0340), see [Clerk's Record](#) at Book 2031 at pg. 3025 - 3026, with two (02)

³³ Tavares, since the beginning of the Brickell Premier Project is systematically bombarded by issues not encountered in similar projects, and despite that, Tavares finds better solutions, only to be undermined by Avila, *et al.*, for unknown reasons at the time. To this day, Tavares remembers the countless nights while living at Villa Regina Condo Unit 707 at 1581 Brickell Avenue, Miami, FL, having to regularly change the bedding two or three times at night due to excessive sweating because of the stress from the CCE's sabotage of the Project. At the time, Paulo Melo lives at Villa Regina Unit 505 (Folio #01-4139-041-1020), purchased on August 28, 1997 by Paulo Melo's company Glasgow Business Services, Inc., a Florida corp. ("GLASGLOW") (Tax Id. #65-0779250) (SUNBIZ Doc. #P97000075370); On January 1, 2001, GLASGOW deeds the Unit 505 to Paulo Melo's RETRO Advisors, Inc., a B.V.I. corp. ("RETRO BVI"), see [Clerk Records](#) at Book 19469 at pgs. 476 -477; On October 23, 2020, Paulo Melo's RETRO BVI deeds Unit 505 to Paulo Melo's Retro Advisors, LLC, a Florida L.L.C. ("RETRO USA") (Tax Id. #83-4055610) (SUNBIZ Doc. #L18000291239), showing agent [Stewart L. Kasner](#) ("Kasner") (Florida Bar No. 119.131) at [Holland & Knight](#) Law.

³⁴ On December 31, 2008, BANIF Mortgage and BANIF Forfeiting (USA), Inc., a Florida corp. ("BANIF Forfeiting" or "BANIF") (Tax Id. # NONE) (SUNBIZ Doc. #P06000054184), a company showing Capela, DeCaso, Valdemar Lopes, Antonio Julio M. Rodrigues ("Julio Rodrigues"), *et al.*, as directors and officers, and Slosbergas NS Corporate Services as its registered agent, merge with BANIF Mortgage, see Merger Documents by [Juan Carlos Cura](#) ("Cura") (Florida Bar No. 797.596) at Nelson Slosbergas, P.A., changing its name to BANIF Finance (USA), Corp., a Florida corp. ("BANIF FINANCE" or "BANIF"); On December 8, 2017, BANIF FINANCE changes its name to RIVIERA Capital USA Corp. ("RIVIERA CAPITAL" or "BANIF") (SUNBIZ Doc. #P02000022068), showing Cruz as President/CEO for the Amendment prepared by [Alfredo Domingo Xiques](#) ("Xiques") (Florida Bar No. 599.581) at Garcia & Xiques, P.A.; and, on January 11, 2018, RIVIERA CAPITAL changes its name to WESTON Capital USA, Corp., a Florida corp. ("WESTON USA" or BANIF"), showing De Souza and Cruz as directors and Xiques preparing the Amendment. The record shows that in 2017, Cruz founded [Weston Capital Group](#) ("WESTON GLOBAL") with offices in, *e.g.*, Miami, Amsterdam, São Paulo (Brazil), Lisbon (Portugal), and partnerships in Luxembourg, New York, Munich, and Madrid, providing, among other services, "Fund Management, Corporate Services, Private Equity, Cryptocurrency Exchange, and Property Management." On September 25, 2020, WESTON USA / BANIF is dissolved by the Florida Secretary of State Department of Corporations for lack of filing annual corporate filings and payment of fees.

³⁵ [IPE Cayman](#) is an entity controlled by BANIF's Del Priore, and the Tequesta 2 Condo is purchased as Del Priore's property.

mortgages,³⁶ in the amount of \$92,000, see *Id.* at Book 20313 at pgs. 3027 – 3050; and for \$11,500, see *Id.* at Book 20313 at pgs. 3051 – 3058. In 2013, Horn sells the Meadow Condo to Lili Torres (“Lili”).

On September 3, 2003, Alexandre Wolloch, as president of Raltron Electronics Corporation, a Florida corp. (“RALTRON”) (Tax Id. #59-2342778) (SUBIZ Doc. #G53588), and Grantor, signs a Deed of property at 10651 NW 19 Street, Miami, FL 33172 (Folio #30-3032-022-0010) (“19 ICP” property) to Horn’s 19 ICP, LLC, a Florida L.L.C.³⁷ (“19 ICP”) (Tax Id. #01-0796533) (SUNBIZ Doc. #L030 00031981), see [Clerk’s Records](#) at Book 21660 at pgs. 0320- 0321; On September 5, 2003, Horn as Manager of 19 ICP, and mortgagor, executes a \$4,690,000 mortgage prepared by Slosbergas, signed by Cortes as Managing Director of BANIF Mortgage Company, a Florida corp. a.k.a. BANIF Finance (USA) Corp. a.k.a. Riviera Capiral USA Corp. a.k.a. WESTON Capital USA Corp. (“BANIF”) (Tax Id. #P02000022068), see [Clerk’s Records](#) at Book 21660 at pgs. 336 – 0355; *Id.* at 21660 at pgs. 361 – 370; and, *Id.* at 21660 at pgs. 0356 – 359; on April 20, 2004, Del Priore as director of BANIF Mortgage Company (“BANIF”), executes as mortgagee, an Assignment to Munditrading Limited, a Cayman Islands company (“MUNDITRADING Cayman”) of the Mortgage and Promissory Note of \$4,690,000 from Borrower/ Mortgagor 19 IPC, executed by Horn as Manager, see *Id.* 22263 at pgs. 2570 – 2572; on May 8, 2007, Horn, president of 19 ICP, and mortgagor, executes a mortgage with Mortgagee HLT, LLC, a Florida L.L.C.³⁸ (“HLT”) (Tax Id.# 20-5616042) (SUNBIZ Doc. #L06000043346), stating among other things, “*This instrument is exempt from documentary stamp tax pursuant to FAC Section 12B-4.054 as a Contingent Obligation. This instrument is exempt from intangible tax as no Promissory Note was executed in connection herewith,*” see *Id.* 25771 at pgs. 3594 - 3600; on July 26, 2007, Lewis records again the same mortgage, with the same notarized signatures, stating on first page “*This Mortgage is being re-recorded to correct legal description*”, and only changing the legal description of the mortgaged properties to add Exhibit A with an additional “Parcel 2”, see *Id.* 25810 at pgs. 2583–2589; on May 15, 2007, DeRosa, Manager of HLT, mortgagee, signs a Satisfaction of Mortgage by 19 ICP, mortgagor, prepared by Lewis, for repayment of \$2,230,437.81, see *Id.* 26492 at pgs. 4078 – 4079; on July 11, 2008, Mendes as director of MUNDITRADING Cayman, and as director of FINAB Directors, Ltd. (“FINAB Offshore”), executes a Satisfaction of Mortgage for the 19 ICP “*mortgage recorded at Clerk’s Record at Book 21660 at pgs. 336 – 355 and Id. 25771 at pgs. 3601 – 3603*”, see *Id.* Book 26492 at pgs. 4076 - 4077; on July 17, 2008, Horn, as Manager of 19 ICP, executes as Grantor, a Deed for \$8,123,100, prepared by Slosbergas, to HLT as Grantee, see *Id.* 26487 at pg. 0160; and, on October 18, 2010, DeRosa as Manager of HLT, signs a Deed for \$8.5 million, to Red Apple at Doral, LLC, a Florida L.L.C. (Tax Id. #27-2923863) (SUNBIZ Doc. #L10000060664), see *Id.* 27471 at pgs. 1158 – 1160. The record shows that, the CCE after hijacking BANIF, starts systematically using, among other BANIF’s entities, MUNDITRADING Cayman to further their global money laundering schemes, tax frauds, and exchange of properties and assets between

³⁶ The record shows Horn using Greenpoint Mortgage Funding, Inc., a New York company (“Greenpoint Mortgage”), with an address at 100 Wood Hollow Drive, Novato, California 94945, for both \$11,500 and \$92,000 mortgages on the Meadow Condo property, and reselling the Meadow Condo to Lili for \$156,000 on May 30, 2013, in a Deed prepared by [Michael Freeman](#), see Clerk’s Record at Book 28670 at pgs. 2862 – 2864.

³⁷ SUNBIZ records shows 19 ICP founded by Slosbergas, and having Horn, [Fernando Braghin](#) (“Braghin” or “Eichenwald’s Son-in-law”), Slosbergas NS Corporate, [Gideon Djerassi](#) (“Djerassi”), and [Allan Kahane](#) (“Kahane”) as officers and agents.

³⁸ [SUNBIZ](#) records shows HLT founded by [Harold Leonard Lewis](#) (“Lewis”) (Florida Bar No. 441.643), and having managers Lewis and Anthony T. DeRosa a.k.a. Tony DeRosa (“DeRosa”).

counterparts³⁹ and others and bribing without detection by U.S. regulators and law enforcement.

On March 25, 2004, The Greenwich Development Group, LLC, a Florida L.L.C. (“Greenwich Group”) (Tax Id. #51-0511830) (SUNBIZ Doc. #L04000023235) is founded by Lopes and Denis Lacerda de Quieroz as Managers, and Slosbergas NS Corporate as registered agent. Greenwich Group is registered agent of

³⁹ See, e.g., Assignment of \$500,000 Mortgage on April 20, 2004, borrowers De Souza & wife Claudia A. de Souza (“Claudia De Souza”) and lender BANIF, signed by Del Priore to MUNDITRADING Cayman (a BANIF company), see Clerk’s Record at Book 22263 at pgs. 2530 – 2543; Mortgage of \$448,000 on May 11, 2005 from lender BANIF to Capela and wife Adele Tolli Capela (“Adele Capela”) for their Condo at 251 Crandon Boulevard, Unit 627, Key Biscayne, FL (Folio #24-4232-018-1570), prepared by Slosbergas at Nelson Slosbergas, P.A., showing Capela and Adele Capela’s signatures in Miami-Dade County, FL, notarized by New York Notary Public Joaquim M. Faneca (pgs. 15-16), *id.* 23502 at pgs. 4069 – 4089; Subordination of October 23, 2006 of a \$2.8 million mortgage from MUNDITRADING Cayman to Washington Mutual Bank, N.A. (“Washington Mutual”) for De Souza and Claudia De Souza’s new loan from Washington Mutual in the amount of \$3 million, prepared by Stanham at FHRS, *id.* Book 25895 at pgs. 4541 – 4543; Certificate of Resolution on October 30, 2006 by MUNDITRADING LTD. a.k.a. MUNDITRADING Cayman, nominating Fernando Mota Mendes (“Mendes”) (an “Accountant”), a BANIF director and director of FINAB Secretaries Ltd., a Cayman Islands company (“FINAB Offshore”) to authorize De Souza and Claudia DeSouza’s \$3 million mortgage subordination with Washington Mutual, *id.* 25067 at pgs. 93 – 94; Satisfaction on September 7, 2007 of a \$170,000 mortgage by MUNDITRADING Cayman from mortgage to BANIF’s employee and Notary Public Sylvia Bachman (“Sylvia Bachman”), signed by DeCaso as Executive Vice President of MUNDITRADING Cayman, showing an address at 1001 Brickell Bay Drive, Suite 1804, Miami, FL 33131, and “Attested” by Luisa Freitas (“Luisa Freitas”), a BANIF employee in Miami, FL, witnessed by Freitas and Isidoro Riguero (“Riguero”), from BANIF Miami, with DeCaso’s signature notarized by Luciana St. Peter (“Luciana St. Peter”), a BANIF agent, *id.* 25922 at pgs. 4593 – 4594; Assignment of a \$4 million Mortgage on December 27, 2007, from BANIF to BANIF’s MUNDITRADING Cayman from borrower 1831 James, LLC, a Florida L.L.C. (“1831 James”) (Tax Id. #93-0384542) (SUNBIZ Doc. #L04000011440), incorporated by Stanham at FHRS, and showing, *inter alia*, FHRS’s Transglobal Corporate and Slosbergas NS Corporate as registered agents, signed by Capela as BANIF’s CEO, in document prepared by Luisa Freitas and notarized by Luciana St. Peter, *id.* 26529 at pgs. 3421 – 3422; Satisfaction of a \$550,000 Mortgage for Devecorp. Inc., a B.V.I. Corp. (“DAVECORP”) on April 21, 2008 by MUNDITRADING Cayman, signed by Mendes as Director of MUNDITRADING Cayman and FINAB Offshore, showing an address at Genesis Building 3rd Floor, Georgetown, Grand Cayman, Cayman Islands, British West Indies, “Attested” by Luisa Freitas, *id.* 26359 at pgs. 3337 – 3337; Satisfaction of a \$100,000 Mortgage for Joseph and Srourian De Samman (“De Samman”) on April 21, 2008 by MUNDITRADING Cayman, signed by Mendes as Director of MUNDITRADING Cayman and FINAB Offshore, showing an address at Genesis Building 3rd Floor, Georgetown, Grand Cayman, Cayman Islands, British West Indies, “Attested” by Luisa Freitas, *id.* 26359 at pgs. 3406 – 3407; Satisfaction of a \$630,000 Mortgage for Kahane and wife Patricia D. Niemeyer Kahane (“Patricia Kahane”) on February 17, 2009 by MUNDITRADING Cayman, signed by Mendes as Director of MUNDITRADING Cayman and FINAB Offshore, showing an address at Genesis Building 3rd Floor, Georgetown, Grand Cayman, Cayman Islands, British West Indies, witnessed by Marco Duarte and Margaret Mendes (“Margaret Mendes”), and showing return address for recorded Satisfaction of Mortgage to Rojas & Stanham, LLP f.k.a. FHRS, at 1000 Brickell Avenue, Suite 215, Miami, Florida 33131, *id.* 26758 at pgs. 3777 - 3778; Mortgage Assumption of the \$4 million loan from BANIF to 1831 James, to new borrower Pestana Miami, LLC (“PESTANA”) (Tax Id. #42-1767053) (SUNBIZ Doc. #L08000110880), signed by Mendes as Director of MUNDITRADING Cayman and FINAB Offshore, showing an address at Genesis Building 3rd Floor, Georgetown, Grand Cayman, Cayman Islands, British West Indies, witnessed by Marco Duarte and Margaret Mendes, and showing the document prepared by Cura at Nelson Slosbergas, P.A., *id.* 26804 at pgs. 1578 - 1582; Assignment of the \$4 million PESTANA loan (outstanding balance of \$3,821,499.96) on July 9, 2009, from MUNDITRADING Cayman to Espirito Santo Bank, a Florida Banking corp. n.k.a. Brickell Bank (“BES Florida” or “BES”) (Tax Id. #59-1479450) (SUNBIZ Doc. #432780) (* BES collapsed in 2014 causing more than \$10 billion in losses, and BANIF collapsed in 2015 causing more than \$3 billion in losses), by Mendes as Director, *id.* 26940 at pgs. 3208–3209; Satisfaction on July 27, 2010 of Mortgage, prepared by Lukacs and signed by Mendes, mortgagee, for a \$195,000 loan between 200 Dolphin Park Corp., a Florida corp. (“200 Dolphin”) (Tax Id. # NONE) (SUNBIZ Doc. #P07000057365) to BANIF Mortgage Company, and assigned to MUNDITRADING Cayman, signed by Mendes, *id.* 27385 at pgs. 4062 – 4063; Satisfaction on July 27, 2010 of \$2.8 million loan, prepared by BANIF Finance (USA) Corp. at 1001 Brickell Bay Drive, Suite 2904, Miami, FL 33131, signed by Fernando Mendes as Director of MUNDITRADING Cayman for the loan/mortgage from BANIF Mortgage Company given to DeSouza and wife Claudia DeSouza for property at 365 Arvida Parkway, Coral Gables, FL 33156 (Folio# 03-5105-002-0110), *id.* 27385 at pgs. 4064 – 4065; Satisfaction of \$671,500 Mortgage on January 5, 2012 from borrowers Ernesto Pereira Lopes Neto a.k.a. Ernesto Lopes (“Lopes”) and wife Valeria Lopes (“Valeria Lopes”) and lender BANIF Mortgage a.k.a. MUNDITRADING Cayman, signed by Marco Duarte as Director of lenders, *id.* 27963 at pgs. 2194 – 2195; Satisfaction on November 15, 2013 of a \$1 million loan/mortgage to Slosbergas’ AVIVA Real Estate, L.L.C., a Florida L.L.C. (“Slosbergas’ AVIVA”) (Tax Id. #20-3862827) (SUNBIZ Doc. #L05000112307), signed by Candance Ebanks and Marco Duarte as Directors of MUNDITRADING Cayman showing an address in the Cayman Islands, *id.* 28917 at pgs. 4261 – 4262; Satisfaction on November 15, 2013 of a \$544,000 loan/mortgage to Jobernylson Prates Neves and wife Fatima Aguiar Prates Neves, signed by Candance Ebanks and Marco Duarte as Directors of MUNDITRADING Cayman showing an address in the Cayman Islands, *id.* 28917 at pgs. 4263 – 4264; Satisfaction of July 10, 2015, prepared by Luisa Freitas, of loan/mortgage of \$820,000 to Del Priore and companion Lidia Saad (“Lidia Saad”) from BANIF Mortgage Company a.k.a. MUNDITRADING Cayman, signed by DeCaso as Manager of BANIF Servicing, LLC, a Florida L.L.C. (“BANIF Servicing” or “BANIF”) (Tax Id. # NONE) (BANIF Servicing is founded on July 15, 2010 and shows DeCaso, Cruz and Riguero as officers, and is dissolved on September 28, 2018 by the Florida Department of State Division of Corporations for lack of filing and payment of annual fees, *id.* 29707 at pgs. 1879 – 1880.

GREENMAX, showing Lopes and Ruiz as managers and Slosbergas' NS Corporate as registered agent.

On March 1, 2005, to further tax schemes⁴⁰ against the United States of America, *et al.*, Rojas at FHRS incorporates San Isidro 2101, Inc., a Florida corp. ("San Isidro 2101") (Tax Id. #NONE) (SUNBIZ Doc. #P05000034453), using FHRS's office Janitor Baskin as the sole director of San Isidro 2101, and showing Guevara notarizing the signature, and FHRS's Transglobal Corporate as registered agent, to avoid taxes on large profits in the sale of condo Unit #2101 at 808 Brickell Key Drive, Miami, FL 33131 ([Folio](#) #01-4206-059-0190) ("Two Tequesta Condo"), purchased for \$470,000, and owned by San Isidro Group, Ltd., a B.V.I. company ("San Isidro B.V.I."); on April 5, 2005, San Isidro Quitclaim Deeds the Two Tequesta Condo to San Isidro 2101, signed by Baskin as director of San Isidro B.V.I., in documents prepared, witnessed and notarized by Rojas at FHRS, see [Clerk's Record](#) at Book 23253 at pg. 0431; on April 19, 2005, San Isidro 2101, showing FHRS's janitor Baskin as president of San Isidro 2101, Deeds the Two Tequesta Condo to Mark Mueller, for \$1.1 million, with documents prepared by Rojas, and janitor Baskin's signature notarized by Notary Public Elizabeth Rojas ("Elizabeth Rojas"). *Id.* 23488 at pg. 2359. On September 15, 2005, Rojas, using Transglobal Corporate and FHRS's Janitor Baskin's signature, files "Corporate Dissolutions for San Isidro 2101" with SUNBIZ (SUNBIZ #P0500003453), with no Tax Id. number for San Isidro 2101, showing how easily Rojas and the CCE systematically defraud the United States of America Treasury Department, *et al.*, by systematically fabricating sham corporate resolutions, mortgages, loans, securities trades, and other sham⁴¹ corporate and financial artifices.

On July 25, 2005, RICA Rentals, LLC, a Florida L.L.C. ("RICA") (Tax Id. #47-0846931) (SUNBIZ Doc. #L02000000062), showing managers Giancarlo Zanolini ("Zanolini") and Zanolini's Tucker Trading, LLC, a Florida L.L.C. (Tax Id. #77-0613651) (SUNBIZ Doc. #L03000044542), executes a Mortgage of \$140,800 with BANIF Mortgage Company, prepared by Rojas at FHRS on behalf of BANIF, see Orange County, FL Clerk's Record at Book 08090 at pgs. 3450 – 3575.

⁴⁰ The CCE's Associate Rojas, systematically defrauds the United States of America, *et al.*, of due taxes on the more than \$630,000 in profits from the sale, to also willfully entrap Rojas's Client, and the ultimate beneficiary of San Isidro B.V.I., a Brazilian industrialist ("Brazilian Client"), in a criminal scheme, thus allowing Rojas and the CCE to blackmail the Brazilian Industrialist at any given time, and eventually allowing the CCE to deprive, steal, and extort properties at will, and preventing the Client from going against Rojas or the CCE, showing the CCE's **Omertà Code**, silencing victims and Associates.

⁴¹ Among many other schemes by Associates of the CCE to systematically defraud the United States of America, the State of Florida, U.S. Citizens, Companies, *et al.*, Rojas, for example, uses the scheme of "Domesticating" his offshore companies, used for years to, *inter alia*, money launder ill-gotten moneys, tax defraud and tax evade, allowing the CCE's Associates to successfully perpetrate their schemes and bringing "Clean Assets" with the Domesticated entities into their portfolio, see, e.g., Domestication of Rojas' Jaros Limited, a British Virgn Islands company ("JAROS B.V.I.") into a "clean" Atherthon Ventures, Inc., a Florida corp. ("ATHERTON Florida") (Tax Id. # 65-08055427 (SUNBIZ #P97000107875); and, Del Priore's "Double-Sham" Domestication of Del Priore's Pebblestone Worldwide Limited Corp., a British Virgin Islands company ("PEBBLESTONE B.V.I.") into Pebblestone Worldwide Limited Corp., a Florida corp. ("PEBBLESTONE 1 Florida") (Tax Id. #65-1151603) (SUNBIZ #P18000031902) showing the CCE's Associate Breno Gomes ("Breno Gomes") at Tax House Corporate Services, LLC ("TAX HOUSE") (Tax Id. #81-3372611) (SUNBIZ #L16000126753); and Pebblestone Worldwide Limited Corp., a Florida corp. ("PEBBLESTONE 2 Florida") (Tax Id. #65-1151603) (SUNBIZ #F01000005791) showing [Sofia Powel-Cosio](#) ("Sofia Cosio") (Florida Bar No. 867.942) as Registered Agent and a longtime Associate of Miami based Brazilian attorney [Jose Maria Carneiro da Cunha](#) ("Carneiro da Cunha") ("Foreign Legal Consultant Florida Bar No. 32.611), showing the CCE's Associates systematically using sham offshore companies, sham officers and directors, with sham signatures and sham corporate documents to systematically defraud, and doubling on the schemes, as they use thousands of companies to defraud the USA, *et al.*

COUNTS

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

Count 2 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud, extort, injure, oppress, threaten, and intimidate Tavares and others in the free exercise and enjoyment of a right and a privilege secured to them by the Constitution and laws of the United States -- that is, among other things, the right to property and rights to proper legal representation free from intimidation, harassment, and extortion of properties and rights upon a Bankruptcy Federal Court in the USA, in violation of, among other things, 18 U.S.C. §241. *See, e.g.,* U.S. Const., Amend. XIV.

Count 3 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 4 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. ("BNY Mellon") (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, depriving and extorting borrower Charles Tavares ("Tavares") of properties and rights relating to a sham \$7 million loan of July 21, 2005 to Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., a Florida corp. ("MRPM"), Brickell Village One, LLC, a Florida L.L.C. ("BV One"), and 2147 S.W. 8 Street, LLC, a Florida L.L.C. ("2147"), by lenders Bridgeloan Investors, Inc., a Florida corp. ("BRIDGELoAN") (Tax Id. #65-0665516) and BNY Mellon, showing BNY Mellon providing at least \$2.5 million of the \$7 million sham loan, in violation of, 18 U.S.C. §1344.

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

Count 6 - The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by using, among other things, a sham legal representation of Tavares personally, and Tavares' Companies MRPM, BV One, and 2147 by attorneys Freeman, Haber, Rojas, and Stanham at FHRS, and Lehman at Levine Kellogg Lehman Schneider +Grossman, LLP ("LKLS+G"), Markowitz and Hartog at MRTH, before a sham loan of \$7 million to purchase the Miami River Marina property before a tainted auction upon the Federal Bankruptcy Court for Miami, Florida, by the CCE's lender BRIDGELoan and counterpart BNY Mellon, with the intent to deprive, steal, and extort Tavares and Tavares' Companies MRPM, BV One, and 2147 of all properties and rights, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 7 – Freeman, Haber, Rojas, and Stanham at FHRS, and Lehman at Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), and Markowitz and Hartog at MRTH, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort the client Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services, furthering major underlying criminals schemes of extortion, bank and mortgage frauds, intercontinental money laundering of illicit funds through the United States of America, trust account frauds, false an conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

8	From Before July 21, 2005 To After June 2007	<u>U. S. CODE TITLE 18</u>	Stephen Ames Freeman
9		§ 371 Conspiracy to Defraud the USA	Marco Emilio Rojas
10		&	Robert Michael Haber
11		§ 241 Conspiracy Against Rights	Nicholas Stanham
12		&	FHR&S, LLP
13		§ 1346 Scheme/Artifice to Defraud	Nelson Slosbergas
14		&	Joseph Horn
		§ 1344 Bank Fraud	Ralph Horn
		&	Ricardo Eichenwald
		§ 1961 <i>et seq.</i> – RICO	Elias Antonio Barreto
		&	Luciana Barreto
		<u>FLORIDA STATUTES</u>	Bridgeloan Investors, Inc.
		Title XLVI § 817.155 Fraudulent Practices	Thomas Ralph Lehman
		&	LKLS+G, LLP
	<u>FLORIDA CODE OF JUDICIAL CONDUCT</u>	Jerry M. Markowitz	
	Violations of Canons 1, 2, and 3	Ross Robert Hartog	
		Markowitz Davis Hartog, <i>et al</i>	
		The Bank of New York Mellon	
		Gabriela Machado Guimaraes	
		Paulo Henrique Tavares de Melo	
		Integra Solutions, LLC	
		The Continued Criminal Enterprise	

From before July 21, 2005, to after June 2007, the Associates of the Transnational Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”), continuously systematically interfere with Charles Tavares’ (“Tavares”) loans from the CCE’s Bridgeloan Investors, Inc., a Florida corp. (“BRIDGELoAN”), and Mellon United National Bank, N.A. a.k.a. The Bank of New York Mellon (“BNY Mellon”) and Valsana Investment, Inc., a Panamanian corp. (“VALSANA”), to cause borrower Tavares and Tavares’ Companies Miami River Park Marina, Inc., a Florida corp. (“MRPM”), Brickell Village One, LLC, a Florida L.L.C. (“BV One”), and 2147 SW 8 Street, LLC, a Florida L.L.C. (“2147”) to default so they can deprive, steal and extort Tavares of \$75 million of properties securing by the sham \$7 million loan of July 21, 2005. Tavares, at all relevant times, unsuspectingly,⁴² is represented by the CCE’s Associates Stephen Ames Freeman (“Freeman”), Robert Michael Haber (“Haber”), Marco Emilio Rojas (“Rojas”), and Nicholas Stanham (“Stanham”), at FHRs, which are partners, attorneys, and agents of BRIDGELoAN and Associates Joseph Horn (“Horn”), Ralph Horn (“Ralph”), Ricardo Eichenwald (“Eichenwald”), Nelson Slosbergas (“Slosbergas”), and Fernando Braghin (“Braghin”). The CCE’s Associate Thomas Ralph Lehman (“Lehman”) and wife Amy Lehman (“Amy Lehman”), introduced to Tavares by Rojas to represent Tavares in the 2005 purchase, and after, of the MRPM property in Bankruptcy court, continuously falsely befriend Tavares and Tavares’ wife in order to gain Tavares’ trust⁴³ needed for the CCE to extort Tavares of all properties and rights.

⁴² Tavares’ attorneys at FHRs never disclose that they are falsely representing Tavares in a fatal conflict of interest as Associates of the CCE and partners with sham lender BRIDGELoAN, and Associates, *e.g.*, Horn, Ralph, Eichenwald, Slosbergas, and Braghin continuously representing BRIDGELoAN in competing real estate investments, development, and financing, and that FHRs’ attorneys have been caught – and allowed to continue their underlying schemes with total impunity after money laundering + \$461 million of drug moneys for Drug lord Fernando Zevallos Gonzales (“Zevallos Gonzales”), by signing with the reckless enabler Florida Bar an admission of “*minor Trust Account violations*”, allowing Freeman to escape to Israel, avoiding USA law.

Concurrently, Associate Luciana Barreto⁴⁴ (“Luciana Barreto”), Elias Antonio Barreto’s (“Elias Barreto”) wife, surreptitiously approaches Tavares’ investor Dantas to further the scheme. Eichenwald’s daughter,⁴⁵ (“Nicole Eichenwald”) as part of the scheme involving, conning and extorting, surreptitiously approaches Dantas to enable Eichenwald to interfere with Tavares’ investor. Ruiz, furthering the scheme, frequently visits Tavares’ business The Car Wash Concept at Brickell (“Car Wash Concept”), located at 250 SW 7 Street, Brickell West, Miami, FL, and, upon gathering intelligence for the CCE on Tavares, Tavares’ family, and Tavares’ businesses, approaches Tavares’ wife at the Car Wash Concept offering, and buying Tavares’s wife car. Ruiz contacts and visits Tavares’ offices at 444 Brickell Avenue, Miami, FL, enquiring about properties for his investors, to gather intelligence for the CCE. On September 1, 2006, Flick Mortgage Investors, Inc., a Florida corp. (“Flick Mortgage”) (Tax Id. #59-2936881) furthering the scheme, provides a \$1 million mortgage for Tavares’ homestead at 218 SE 14 Street, Penthouse 1, Miami, FL, showing Rojas⁴⁶ representing Tavares in the closing and loans. Paulo Henrique Tavares de Melo⁴⁷ (“Paulo Melo”) a partner of Nelson Stabile (“Nelson Stabile”) and Gabriela Machado Guimaraes⁴⁸ (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), at Integra Solutions, LLC, a Florida L.L.C. (“INTEGRA”) (Tax Id. #20-3844303), incorporated on November 21, 2005 by Rojas at FHRS, is introduced to Tavares by Julio Mendoza-Riglos,⁴⁹ (“Julio Mendoza”), a senior vice president at UBS Financial Services USA, Coral Gables, FL (“UBS Bank”), becomes a Tavares’ investor, together with several of Paulo Melo’s family members from Brazil. Rojas and Stanham, to further schemes extorting Tavares of all properties and rights, become a 1.5% minority partner⁵⁰ in another of Tavares’ project

⁴³ One of the CCE’s Associates core tenets is conning their clients/victims to believe they are trustworthy, while gathering intelligence (“*keep your friends close and your enemies closer*”), so the Associates can extort their clients/victims easily.

⁴⁴ Luciana Barreto, a Brazilian-born, surreptitiously, to further the CCE’s scheme to extort Tavares of all properties, approaches and involves Tavares’ investor Dantas, offering, *inter alia*, real estate services, renting to Dantas, an apartment at the Portofino Tower at 300 South Pointe Dr., Miami Beach, FL, gathering intelligence, and tricking Tavares’ investor Dantas into the scheme.

⁴⁵ To further the CCE’s scheme to extort Tavares, and Tavares’ investor Dantas, Nicole Eichenwald, surreptitiously, and without any personal and business relationship with Dantas, contacts Dantas via email, provided by another Associate of the CCE, inviting Dantas – that does not yet know Eichenwald, for a “*surprise birthday party for Eichenwald in São Paulo-Brazil*”, in order to completely involve and surround Dantas, to allow conning Dantas to further schemes extorting Tavares of all properties.

⁴⁶ Rojas to further schemes to extort Tavares of all properties and rights, never discloses that Flick Mortgage is an entity used by the CCE to further its underlying schemes, and that Rojas, Horn, Eichenwald, Slosbergas, Ruiz, *et al.*, are partners with Flick.

⁴⁷ Paulo Melo’s father, Romildo Tavares de Melo, also Brazilian, after selling a business in Brazil, gifts Paulo Melo and sister Silvia Tavares de Melo, \$50 million each, placing the moneys at UBS and in the Bahamas.

⁴⁸ Guimaraes is the daughter of corrupt Brazilian politician Gilson Machado Guimaraes Filho (“Gilson Machado”), sent to Miami, FL, in a fraudulent business US Visa, to manage the money laundering of more than \$30 million dollars of bribes mostly from PETROBRAS S.A., through the real estate, banking, and securities markets in the United States. Guimaraes, even before allowed to work in the USA with the fraudulently obtained Visa, is already perpetrating schemes to defraud the IRS, *et al.*, working with Garry Nelson (“Nelson”) (Florida Bar No. 717.266), Rojas at FHRS, *et al.*, becoming an Associate of the CCE.

⁴⁹ Julio Mendoza also introduces to Tavares, among others, BANIF’s Hugo Barreto Del Priore (“Del Priore”), Leo Altstut (“Altstut”), Carlos Pesquera (“Pesquera”), and Bruno Miranda (“Bruno Miranda”), at UBS Bank.

⁵⁰ The CCE’s Associates Rojas and Stanham, following the improper representation, in fatal conflict of interest, in the same 139 TH project of, among other clients, Tavares, Francisco Mesa, Joao Evangelista da Costa Tenorio (“Joao Tenorio”) and Jose Tenorio Lins de Albuquerque Neto (“Jose Tenorio”), BANIF’s Del Priore, and Rojas and Stanham themselves as partners, and attorneys of 139 TH – continuously in fatal conflict, perpetrating systematic torts with an advantageous business relationship to defraud Tavares, *et al.*, successfully steals proceeds from a sham sale of 139 TH’s 29 Acres property on May 18, 2022.

[139 TH Avenue SW 8 Street, LLC, a Florida L.L.C.](#) (“139 TH”). Julio Mendoza introduces to Tavares and wife, a high-ranking law enforcement official⁵¹ (“Brazilian Official”), from São Paulo-Brazil, that surreptitiously befriends Tavares and Tavares’ wife to further the scheme by gathering intelligence from Tavares in Brazil, allowing the CCE to reach all of Tavares’ family members, assets, and other interests everywhere in the world where the CCE operates its Global schemes. Tavares, unsuspecting, and knowing no reason not to trust Tavares Florida Bar licensed attorneys at FHRS, in a dispute between Tavares’ [Granmix, LLC, a Florida L.L.C.](#) against J.C. Marble & Tile, Inc., a Florida corp., Tavares’ attorney Rojas refers Tavares to Associate Fine, to keep Tavares within the CCE’s realm,⁵² controlling the victim. Shortly after Tavares’ MRPM closes on the 9 Acres Miami River Marina riverfront property, Tavares starts engaging land use and environmental consultants, and architects, and developing the conceptual project to maximize the potential highest and best use of the unique largest riverfront property in Miami. Immediately, Tavares receives several bona fide offers to purchase the Miami River Marina property, from \$21 million to \$27 million, as well as offers for joint ventures, among others, a + \$325 million Condo-Marina⁵³ project, with [projected profits of more than \\$75 million](#), with developer Paul C. Murphy (“Paul Murphy”), that recently had developed major condo projects in Miami. At all relevant times, Rojas at FHRS is representing Tavares, and Dantas in contract negotiations, and it is now known that Rojas, an Associate of the CCE, is surreptitiously sabotaging and interfering with an advantageous business relationship on Tavares’ deals, allowing, e.g., Associate BRIDGELoAN, *et al.*, to continue extorting all related parties to cause Tavares’ sham loan with BRIDGELoAN and BNY Mellon to default so they can extort Tavares’ all of Tavares’ properties and rights. At the same time, Rojas and other Associates of the CCE implicated, are diligently interfering with all of Tavares’ investors, including among others, Tavares’ partners in The Car Wash Concept franchise project on Brickell, Joao Evangelista da Costa Tenorio (“Tenorio”) and Jose Tenorio Lins de Albuquerque Neto (“Jose Tenorio” or “Tenorio’s son”), Tavares’ investors in 139 TH, among others, Leonardo Altstut (“Altstut”), *et al.*,⁵⁴ in order to extort Tavares. While Braghin sends BRIDGELoAN’s [bank instructions](#) for their account at [Safra National Bank](#) (“SAFRA”) for Tavares to send MRPM’s monthly interest payments of about \$60,000, Braghin, *et al.*, they are all conspiring jointly and together to deprive, steal, and extort Tavares of all properties and rights.

⁵¹ The Brazilian Official has a \$1 million account with Julio Mendoza’s UBS Bank, as other related individuals do, e.g., Paulo Melo and family, Horn’s family, Guimaraes, Del Priore, and BANIF Bank’s \$800 million under custody in the Bahamas, *et al.*

⁵² One of the core tenets of the CCE is to always involve and keep their clients/victims, mostly wealthy foreign investors, within the CCE’s realm so when the CCE, after targeting a profitable victim for years, doing its due diligence with careful deliberations, intelligence gathering, and surrounding them by Associates, can deprive, steal, and extort the clients/victims without any recourse, and the victims having no idea what happened. The CCE’s business model also shows that Associates Slosbergas, Ruiz, and Miranda, in the [Brazilian-American Chamber of Commerce of Florida](#), and Rojas and Fine in the [Colombian-American Chamber of Commerce of Greater Miami](#), “fishing” prospective clients/victims, and then channeling them to other CCE’s Associates in banking, securities, real estate, and insurance, tricking the clients/victims with schemes, securing their allegiance by the CCE’s *Omertà Code*, allowing the CCE to exponentially grow its powers to corrupt and subvert with impunity.

⁵³ Tavares and Murphy’s joint venture for the Condo Marina, a highly desirable and financially rewarding project is willfully sabotaged by Rojas, falsely acting as Tavares’ attorney, since Tavares and Paul Murphy agreed to the project’s material terms in September 2005, starting pre-construction work, until Rojas kills the deal in December 2006 causing Tavares’ irreparable losses.

⁵⁴ Paulo Melo, a Tavares’ investor in several of Tavares’ projects, is co-opted into the CCE by Associate Guimaraes, *et al.*, and starts furthering the CCE’s underlying schemes of intercontinental money laundering and tax evasion and frauds, and following Tavares’ extortion, is rewarded by the CCE by, among other things, forming joint ventures with Horn’s friend and weekly Poker buddy, [Related Group of Florida’s Jorge M. Perez](#) (“Related Florida”), following [Related Florida’s 2012 joint venture in Brazil with Daniel Citron](#) (“Daniel Citron”), the former CFO and director of Horn’s family business CYRELA Brazil Realty (“CYRELA”).

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 America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection systems to further major criminal schemes against the United States, in violation of 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 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 honest services upon national banking and financial associations, to proper legal representation, free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, falsely acting to represent client/victim Tavares, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 10 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 11 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to willfully use, and defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. ("BNY Mellon") (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, depriving and extorting borrower Charles Tavares ("Tavares") of properties and rights relating to a sham \$7 million loan of July 21, 2005 to Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., a Florida corp., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C. , by lenders Bridgeloan Investors, Inc., a Florida corp. ("BRIDGELoAN") (Tax Id. #65-0665516) and BNY Mellon, showing BNY Mellon providing at least \$2.5 million of the \$7 million sham loan, in violation of, and money laundering the ill-gotten proceeds to further scheme through, among other National Banking Association, SAFRA Bank, in violation of 18 U.S.C. §1344.

Count 12 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 13 - The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by using, among other things, a sham legal representation of Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., a Florida corp., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C. (collectively "Tavares' Companies"), by attorneys Freeman, Haber, Rojas, and Stanham at FHRS, and Lehman at Levine Kellogg Lehman Schneider +Grossman, LLP ("LKLS+G"), and Trustees Markowitz and Hartog at Markowitz Ringel Trusty + Hartog, Trust Account ("MRTH Trustees"), before a sham loan of \$7 million to purchase the Miami River Marina property before a tainted auction upon the Federal Bankruptcy Court for Miami, Florida, by the CCE's Joseph Horn, Ralph Horn, Ricardo Eichenwald, Nelson Slosbergas, Fernando Braghin, *et al.*'s sham lender BRIDGELoan and counterpart BNY Mellon, with the intent to deprive, steal, and extort Tavares and Tavares' Companies of all properties and rights, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 14 – Freeman, Haber, Rojas, and Stanham at FHRS, and Lehman at Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Slosbergas, and Markowitz and Hartog at MRTH Trustess, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort the client Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services, furthering major underlying criminals schemes of extortion, bank and mortgage frauds, intercontinental money laundering of illicit funds through the United States of America, trust account frauds, false an conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
15	From Before June 2007 To After December 2009	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Marco Emilio Rojas Robert Michael Haber Nicholas Stanham
16		§ 241 Conspiracy Against Rights &	Nelson Slosbergas Joseph Horn
17		§ 1346 Scheme/Artifice to Defraud &	Ralph Horn Ricardo Eichenwald
18		§ 1344 Bank Fraud &	Fernando Braghin Elias Antonio Barreto
19		§ 1961 <i>et seq.</i> – RICO &	Bridgeloan Investors, Inc. Thomas Ralph Lehman
20		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	LKLS+G, LLP Markowitz Davis Hartog, <i>et al</i> Roberto A. Pedroso
21	FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	Pedro Gomez The Bank of New York Mellon Gabriela Machado Guimaraes Paulo Henrique Tavares de Melo Integra Solutions, LLC The Continued Criminal Enterprise	

From before June 2007, to after December 2009, the Associates of the Transnational Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”), continuously systematically interfere with Charles Tavares’ (“Tavares”) [loans](#) from the CCE’s Bridgeloan Investors, Inc., a Florida corp. (“BRIDGELOAN”), and Mellon United National Bank, N.A. a.k.a. The Bank of New York Mellon (“BNY Mellon”) and Valsana Investment, Inc., a Panamanian corp. (“VALSANA”), to cause borrower Tavares and Tavares’ Companies borrowers, Miami River Park Marina, Inc., a Florida corp. (“MRPM”), Brickell Village One, LLC, a Florida L.L.C. (“BV One”), and 2147 SW 8 Street, LLC, a Florida L.L.C. (“2147”) (collectively “Tavares’ Companies”) to default so they can deprive, steal, and extort Tavares and Tavares’ more than \$50 million of properties secured by the sham \$7 million loan of July 21, 2005. On May 25, 2007, VALSANA’s president Bruno Patricio Cerini executes a Satisfaction of the \$1.5 million second mortgage for Tavares and Tavares’s Companies, see [Clerk’s Record](#) at Book 25801 at pgs. 1686 – 1690, and showing [Slosbergas issuing, on July 2, 2007, a \\$1,909,739.50 check to VALSANA](#) paying off Tavares’ loan with VALSANA. On June 21, 2007, Tavares, represented in fatal conflict of interest, as part of the scheme to extort Tavares by [Marco Rojas](#) (“Rojas”) at FHRS, closes a new \$5 million sham loan⁵⁵ BRIDGELOAN & BNY Mellon, increasing the sham loans to \$12 million. BNY Mellon is represented by [Joseph Donald Wasil](#) (“Wasil”) at [Shutts & Bowen, LLP](#), and the record shows, *inter alia*, that Rojas at FHRS is also an attorney and partner of VALSANA’s principals.

⁵⁵ Tavares’ attorneys Rojas, Robert M. Haber, Nicholas Stanham, *et al.*, are longtime attorneys and Associates of BRIDGELOAN’s [Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, and Nelson Slosbergas](#) (“Slosbergas”), *et al.*, and they are Associates of the CCE, continuously defrauding the United States, U.S. citizens and companies with underlying schemes of intercontinental money laundering of illicit funds, bank and securities frauds, tax evasion and frauds, for the CCE, and third-parties, extortion, and violations of rights. Among the fraudulent documents produced at Closing to further the sham loan, [Rojas and Slosbergas fabricate a fraudulent “Certificate of Shareholder Resolution”, falsely stating, inter alia, that Rojas’ Multi Corporate Services, Inc. is the Sole Director of a Tavares’ Borrower entity, and showing Ana C. Guevara, nominated by Rojas’ Janitor as Vice President, fraudulently stating the resolution is adopted in June 28, 2007, while is notarized on June 21, 2007.](#)

At closing on June 21, 2007, Rojas issues a [Legal Opinion on behalf of Tavares](#), attesting to BRIDGELOAN, that has attended the closing on June 21, 2007 representing Tavares, the borrower and guarantor of the loan, with a Certificate of Tavares as the legal authority to sign personally and on behalf of Tavares' Companies. For unknown reasons, BRIDGELOAN's Slosbergas, days later, summons Tavares to go to his offices to sign a new closing statement, [changing the closing date to July 2, 2007](#). The Sham Loans with fatal conflicts of interest against Tavares are vitiated by fraud. On June 10, 2008, [CB Richard Ellis's Charles Foschini](#) emails Tavares and [Andy Sturner](#), an interested buyer for the Miami River Marina Property. [On October 14, 2008](#), Lehman asks Tavares about Environmental works at the Miami River Marina property informing Tavares' MRPM escrow moneys at \$525,000. [On November 12, 2008](#), Lehman sends a [Retainer Agreement](#) for Tavares representation on matters for BRIDGELOAN and BNY Mellon loans for Tavares to be ready in a dispute. The record obtained shows emails by BRIDGELOAN and Dantas, obtained through a 2013 lawsuit by Tavares against his former attorney [Lehman and LKLS+G, LLP](#), Case No. 2013-12223-CA-40, showing BRIDGELOAN's CCE starting corrupting and extorting Dantas into the scheme defrauding, stealing, and extorting Tavares of all properties and rights, see, for example, Dantas and BRIDGELOAN's Braghin's [emails of December 2008](#) and [January 2009](#), exchanging Tavares' confidential loan information on Tavares' back to extort Tavares. At the same time, Tavares continues to receive several bona fide offers⁵⁶ to purchase the MRPM property between \$22 million and \$27 million, and for the Brickell Village One buildings between \$22 million and \$25 million, and Dantas show no interest, or need on selling. Because Tavares knows that the properties are worth, at all relevant times, over \$50 million dollars, and each separately can be dumped quickly for millions more than the BRIDGELOAN and BNY Mellon loans, and Tavares' partners in the properties, Dantas and Marcos Menezes are worth hundreds of millions of dollars⁵⁷ with liquid assets in Brazil and Switzerland, Tavares see no reason why Dantas and Marcos Menezes would walk away from Tavares, the loan, and the properties, as the market in the Miami River and Brickell areas are dramatically increasing⁵⁸ in value

⁵⁶ Unknown to Tavares at the time, Tavares is surrounded and falsely represented by true criminals enabled, for years, by The Florida Bar ("Florida Bar"), and other law enforcement agencies, using their Florida Bar licenses as guise to commit systematic violations of law and rights, and are secretly conspiring, jointly and together with other Associates of the Criminal Enterprise, to deprive, steal and extort Tavares of all properties and rights, using their advantageous business relationship as Tavares' personal and corporate attorneys to set up Tavares into default of the BRIDGELOAN/BNY Mellon loan, secretly sabotaging deals for Tavares to sell or Joint Venture one of the properties to payoff the loan, and secretly conning and extorting Tavares' partners and investors. See Criminal definition under Merriam-Webster Dictionary: "one who has committed a crime;" "of an illegal act for which someone can be punished by the government." *See also*, Some of the more than 1.370 violations of State and Federal Statutes by associates of the Criminal Enterprise at E-Filing #78629565, at Miami-Dade Civil Cases Record.

⁵⁷ Dantas and Menezes, at the time, own one of Brazil's largest private company importer of [gas and other petroleum](#) from Russia, *et al.*, and one of the largest privately owned network of gas stations in Northeast Brazil, a trading company, and large liquid assets at UBS Bank, *et al.*, and are planning to invest over \$100 million dollars in a new E-Bike factory enterprise in Brazil.

⁵⁸ [Tavares founded www.welovebrickell.com](#), and for years, is directly involved with the City of Miami, successfully creating a better zoning allowing people to "Live, Work & Play" within a 15-minute walk from all, with a better and greener future. In 2009 [Miami 21](#) is adopted, and in doing so, Tavares' properties, [among](#) others, the 2.4 Acres Brickell Village One property and the 9 Acres Riverfront Miami River Marina property benefitted greatly with the new zoning and planning standards, allowing for example, the Brickell Village One property a higher density and higher number of floors due to its central location on Brickell, allowing beautiful Downtown and Bay views, next to the Metromover, shopping centers, restaurants, office towers, and large residential towers, taking the value for the property over \$60 million. Likewise, the Miami River Marina property with its large size, and dockage for large yachts, largest riverfront in Miami, five minutes from Downtown Miami, UM/Jackson Medical Centers, and MIA Miami Airport, is superbly positioned to take advantage of the new zoning that Tavares spent years helping to shape and improve on behalf of the whole community and City, taking the property to a value over \$100 million.

and in demand for large urban land for mixed use projects. Horn and Eichenwald agree to extend the loan for one year after maturity on May 1, 2009, and at all times relevant, led Tavares to believe they are working and processing paperwork extending⁵⁹ the loan. After BRIDGELOAN's Horn and Eichenwald verbally agree to extend Tavares' loan at the beginning of 2009, Tavares, Horn and Eichenwald hold meetings in New York and Miami to discuss details of the extension. On March 24, 2009 at 3:15 p.m., Livia Delgado ("Livia Delgado") at Breno Ranzoni Gomes' ("Breno Gomes") Tax House Corp., a Florida corp. ("Tax Id. #65-0948781) (SUNBIZ Doc. #P99000090 793) a.k.a. Tax House Corporate Services, LLC, a Florida L.L.C. (Tax Id. #81-3372611) (SUNBIZ Doc. #L160 00126753) (collectively "TAX HOUSE"), an Associate of the CCE, erroneously submits an [email](#) to Tavares requesting tax form K-1 for Omega Investments Group Corp., a Florida corp. ("OMEGA") (Tax Id. #20-5001713) (SUNBIZ #P06000023819), one of hundreds of entities⁶⁰ used by the CCE to tax defraud the United States and money launder ill-gotten moneys from Horn and Slosbergas' CCE, among others, Del Priore, Lidia Leite ("Lidia"), Ernesto Pereira Lopes Neto a.k.a. Ernesto Lopes ("Lopes"), *et al.* Since November 12, 2008, and through 2009, Horn, Pedro Gomez ("Pedro Gomez") and [Roberto A. Pedroso](#) ("Pedroso") at [Bank of New York Mellon's Wealth Management](#)⁶¹ are [discussing and negotiating](#) details of renewing the Sham Loan to Tavares as part of the scheme extorting Tavares of properties, with, *e.g.*, bogus appraisals for [Borrower Tavares'](#) loan for the 9 Acres Miami River Marina's property. On May 11, 2009, Pedroso at BNY Mellon's Wealth informs Horn and Eichenwald that the appraisal ordered by BNY Mellon to a conflicted⁶² CB Richard Ellis for the 9 Acres Riverfront Miami River Marina property shows a appraised value of \$4.8 million. Horn, on May 13, 2009, [submits a Letter](#) stating that Tavares' loan with BRIDGELOAN and BNY Mellon Bank has matured on May 1, 2009. Horn and Eichenwald, at all relevant times, as part of the scheme, willfully mislead Tavares to believe the loan is extended for one year from the May 2009 maturity date pursuant to the \$120,000 continued interest payments by Tavares, and BRIDGELOAN is just working out formalities with BNY Mellon. Pursuant to the agreement extending the loan, Tavares pays, and Horn and Eichenwald receive and cash the \$120,000 payments up to September 2009, see Tavares' [Check #1828 of 9/09/2009](#). Concurrently, in May 2009, CCE's Associate Elias Barreto, furthering the scheme, phones Tavares' Investor Dantas living at the time in New York,⁶³ in a [luxurious condo at 40 Bond Street](#),

⁵⁹ At meetings at BRIDGELOAN's offices, and in a New York, Horn tells Tavares that his uncle, Elie Horn at CYRELA, is the main investor in the loans to Tavares, contradicting previous statements of 2005 that BNY Mellon is the biggest investor in the loan.

⁶⁰ Horn, Slosbergas, Rojas, *et al.*'s CCE developed a highly sophisticated and simple transnational money laundering, securities, and tax defrauding enterprise with a trading Shadow Exchange-Market for assets, securities, and properties, predicated on using multiple offshore centers, *inter alia*, in the Bahamas, the Cayman Islands, the B.V.I., *et al.*, that was initially fronted by Janitors – cleaning their offices, and other Straw men signing sham corporate documents, securities, and loans, and after the [Panama Papers](#), the Associates simply started fabricating signatures previously used in the schemes from former Straw men, and having Associates notarize the sham signatures, often using the same entity multiple times by multiple Associates, and years later, they start the scheme of "[Domesticating](#)" these offshore entities into Florida, *et al.*'s companies, showing the perfect crime, allowing criminals Horn, Slosbergas, [Rojas, et al.](#), to live in [The Gables Estates](#) and [Key Biscayne](#), enjoying the security and comfort of the United States, provided by hard-working tax-paying Americans that they [systematically](#) steal from.

⁶¹ BNY Mellon is known as the "[Bank of Banks](#)", [managing more than \\$1.8 trillion dollars and \\$46 trillion dollars under custody](#), and Tavares could not imagine that BNY Mellon is a willful enabler of BRIDGELOAN's CCE, lending its moneys, securities, name, powers, and law firms for known schemes to stealing and extorting U.S. citizens/clients, U.S. companies, and the United States.

⁶² [CB Richard Ellis Appraisal is clearly bogus and conflicted, possibly retaliatory](#), and defies truth and facts, *inter alia*, that the most recent 2006 unbiased appraisal, before the Criminal Enterprise interferes with the appraisals, is [appraised at \\$55 million](#), and since then, the value has increased due to Miami 21 rezoning and higher demand for Central Urban Core large properties.

Unit 5D, to convince Dantas that Dantas should stop funding the payments for BRIDGELOAN's loan to strong-arm BRIDGELOAN to renegotiate the loan with the default. Immediately after Elias Barreto's call, Dantas, very distressed, calls Tavares in Miami telling Tavares that because Elias Barreto⁶⁴ told him to use the default on the loan to negotiate with BRIDGELOAN, he was going to stop to fund the payments. Tavares explains to Dantas the "default strategy" by Elias Barreto, causes the loan into default, placing Tavares and Dantas in a weaker position since the properties securing the loan are appraised at more than \$50 million, and Dantas has the means to continue funding payments. Concurrently, in May 2009, Associate [Gabriela Guimaraes](#) ("Guimaraes") (D.O.B. 07/17/2965, in Brazil) calls Tavares to further the scheme, stating that she "heard" the BRIDGELOAN loan is in default. In July 2009, [Horn and Eichenwald](#) continuing their scheme to extort Tavares, asks Tavares for patience since BNY Mellon "*promised Horn an answer to finalizing the loan extension within a few days*", while acknowledging receiving Tavares' \$120,000 check for payment of July for the agreed 1-year extension from May 2009. On September 25, 2009, Tavares, after negotiating a \$300,000 NN lease for 5 Acres of the Miami River Marina property – not including the valuable Riverfront dock area, is surprised by Tavares' investor Dantas not wanting the lease, showing⁶⁵ Dantas is corrupted into the CCE's schemes. Tavares signs the lease with David L. Fluss ("Fluss") and Jack Levy ("Levy") at Palofmine, Inc., a Florida corp. ("Palofmine"), brought by Broker [Manny Chamizo III](#) ("Chamizo") at [Fortune Realty](#), to allow income to carry costs for the properties, and increasing leverage in a possible bankruptcy proceeding to protect the valuable assets with a proper disposition bypassing BRIDGELOAN's Criminal Enterprise's schemes. On October 19, 2009, Pedroso at BNY Mellon Wealth Management, as part of the scheme, after almost a year of sham loan negotiations for "[Borrower Tavares](#)", sends an email with attachment, with the proposal for the loan renew. In November 2009, Horn to further the scheme informs Tavares that a friend in Brazil, [Renato Ochman](#) ("Renato Ochman") ([OAB-SP Brazil No.82.152](#); and, [OAB-RS No. 17.410](#)) is interested in buying the Brickell Village property. Because Tavares did not know Tavares is surrounded by criminals of the CCE, Tavares believing Horn, flies to São Paulo, Brazil and meets Renato Ochman at his offices. On December 1, 2009, Horn, as part of the scheme forwards to Dantas, c.c. Tavares, an email from Horn's associate [Daniel Citron](#) ("[Daniel Citron](#)") at [Tishman Speyer](#) with Renato Ochman's sham \$8 million offer, with the intent to devalue in the eyes of Dantas and Tavares' investors, the collateral assets for Tavares's loan with BRIDGELOAN and BNY Mellon, furthering the CCE's extortion of Tavares. BRIDGELOAN's CCE uses a powerful global network of Associates, enablers, counterparts, and reckless professionals to further major transnational criminal schemes, showing total disdain for the rule of law, U.S. citizens rights, and our democracy. The record shows lender BRIDGELOAN's unclean hands at all times against Borrowers.

⁶³ Following years of involving and conning Tavares' Investor Dantas by Associates Elias Barreto and wife Luciana Barreto, to further BRIDGELOAN's CCE's scheme to extort Tavares of all properties and rights, the Associates, in a willful and coordinated way, systematically interfering with the loan, by, among other things, continuously spreading false rumors and information, fabricating and producing sham appraisals and offers to devalue Borrower Tavares's collateral properties securing the sham loans with BRIDGELOAN and BNY Mellon, and extorting Tavares' investors, they successfully undermine Tavares' investors belief in the true value of the collateral properties securing the sham loan, to willfully cause the loan into default to extort.

⁶⁴ At the time, Tavares had no idea that Elias Barreto is an employee of BRIDGELOAN and that BRIDGELOAN and its principals are Associates of a Transnational Continued Criminal Enterprise, and that BNY Mellon is a willful enabler of BRIDGELOAN's intercontinental money laundering of illicit funds through the United States of America, tax frauds, and extortion schemes.

⁶⁵ Tavares, after August 2013, upon obtaining discovery from Tavares' malpractice lawsuit against Lehman and LKLS+G, starts to understand the scope and reach of the Criminal Enterprise's schemes corrupting Tavares' investors, partners, and attorneys, and others implicated, to deprive, steal, and extort Tavares of all his highly valuable and desirable properties and rights.

COUNTS

Count 15 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection systems to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 16 - 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 honest services upon national banking and financial associations, to proper legal representation, free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, falsely acting to represent client/victim Tavares, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 17 - 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 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 18 U.S.C. §1346.

Count 18 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to use and defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. ("BNY Mellon") (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, depriving and extorting borrower Charles Tavares ("Tavares") of properties and rights relating to the sham \$12 million loan to Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., a Florida corp., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C. , by lenders Bridgeloan Investors, Inc., a Florida corp. ("BRIDGELoAN") (Tax Id. #65-0665516) and BNY Mellon, showing BNY Mellon providing at least \$2.5 million of the \$7 million sham loan, in violation of, and money laundering the ill-gotten proceeds to further scheme through, among other National Banking Association, SAFRA Bank, in violation of 18 U.S.C. §1344.

Count 19 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record, and [Tavares Sworn Affidavit](#).

Count 20 - The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by using, among other things, a sham legal representation of Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., a Florida corp., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C. (collectively "Tavares' Companies"), by attorneys Freeman, Haber, Rojas, and Stanham at FHRS, and Lehman at Levine Kellogg Lehman Schneider +Grossman, LLP ("LKLS+G"), and Trustees Markowitz and Hartog at Markowitz Ringel Trusty + Hartog, Trust Account ("MRTH Trustees"), before a sham loan of \$7 million to purchase the Miami River Marina property before a tainted auction upon the Federal Bankruptcy Court for Miami, Florida, and the sham \$5 million loan of 2007, taking the sham loans to \$12 million, by the CCE's Joseph Horn, Ralph Horn, Ricardo Eichenwald, Nelson Slosbergas, Fernando Braghin, *et al.*'s sham lender BRIDGELOAN and counterpart BNY Mellon, with the intent to deprive, steal, and extort Tavares and Tavares' Companies of all properties and rights, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 21 – Freeman, Haber, Rojas, and Stanham at FHRS, and Lehman at Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Slosbergas, and Markowitz and Hartog at MRTH Trustees, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort the client Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services, furthering major underlying criminals schemes of extortion, bank and mortgage frauds, intercontinental money laundering of illicit funds through the United States of America, trust account frauds, false an conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
22	November 23, 2009	U. S. CODE TITLE 18	Andrew Clifford Hall Matthew Paul Leto Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Nelson Slosbergas Renata Carvalho Bertrand Bridgeloan Investors, Inc. The Continued Criminal Enterprise
23		§ 371 Conspiracy to Defraud the USA &	
24		§ 241 Conspiracy Against Rights &	
25		§ 1346 Scheme/Artifice to Defraud &	
26		§ 1341 Mail Fraud &	
27		§ 1961 <i>et seq.</i> – RICO &	
28		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	

On November 23, 2009, attorney Andrew C. Hall (“Andy Hall”) (Florida Bar No. 111.480), at Hall, Lamb and Hall, P.A. (“Hall & Lamb”), representing Bridgeloan Investors, Inc., a Florida corp.’s (“BRIDGELOAN”) submits, via U.S. Postal Mail, to further BRIDGELOAN’s ongoing scheme extorting borrower Charles Tavares (“Tavares”) and Tavares’ Companies Miami River Park Marina, Inc., a Florida corp. (“MRPM”), Brickell Village One, LLC, a Florida L.L.C. (“BV One”), and 2147 S.W. 8 Street, LLC, a Florida L.L.C. (“2147”) (collectively “Tavares’ Companies”) of more than \$50 million in collateral properties securing a sham \$12 million loan with BRIDGELOAN and BNY Mellon, a Letter demanding payment, and making false statements, and supported by a facially fraudulent [Sworn Affidavit](#)⁶⁶ by BRIDGELOAN’s principal Joseph Horn (“Horn”). Among other false and contradictory statements, Hall & Lamb states that: *“To accommodate to the borrower, Bridgeloan Investors, Inc. was willing to forbear on the exercise of its rights under the Note if it received \$120,000 per month while the parties were attempting to reach a further agreement to discharge this obligation. No payments have been received on this forbearance for the past two months. Therefore, this interim agreement is now at an end and the loan Note remains mature and is in default.”* See Hall & Lamb’s Letter Ref. #9776\00134380.2. The truth and the record shows that BRIDGELOAN agreed to one year extension from May 2009 through May 2010, while using BNY Mellon to, among other things, trick borrower Tavares to believe the delay with the paperwork is because of BNY Mellon, while BRIDGELOAN’s Associates continuously and systematically interfere with the loan with an advantageous businesses relationship, with, *e.g.*, sham appraisals and offers devaluing the collateral properties securing the loan and extorting Tavares’ investor Dantas to stop funding loan payments in [September 2009](#). Concurrently, Horn willfully signs in support of BRIDGELOAN’s demand, the facially fraudulent Affidavit of BRIDGELOAN’s Joseph Horn (“Horn”) (“[Horn’s Sham Affidavit of 11/23/2009](#)”) with false and contradictory statements that Horn and Hall & Lamb know are not true.

⁶⁶ [Horn’s Sham Affidavit of 11/23/2009](#), shows Horn’s signature notarized on November 23, 2009 by BRIDGELOAN’s [Renata Carvalho Bertrand](#) (“Renata Bertrand”), already displaying the styled-action “*Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al., Case No. 09-93058-CA-30,*” even though the styled-action is only filed a month later, on [December 24, 2009](#), showing, *e.g.*, the CCE’s **Omertà Code** binding the Associates upon launching the extortion schemes before the courts, and the forgery and fabrication mill of sham Affidavits, Corporate Resolutions, Fake Shareholders and Directors to defraud.

Furthering the scheme, Horn and Hall & Lamb, falsely state among other things, that the amount due under the Note is \$15,722,178.67, charging Tavares \$3,744,666.67 in late interest payments from February 28, 2009, through November 30, 2009, fraudulently inflating the amounts due, when in truth and in fact, Horn and Hall & Lamb know Tavares paid, and BRIDGELOAN did receive \$120,000 monthly interest payments until [September 2009](#), when BRIDGELOAN successfully extorted Tavares' investor Dantas to stop funding the interest payments. See Hall & Lamb's Sworn Affidavit signed by Horn on behalf of BRIDGELOAN at Doc. #9881\00190916.1. See [Tavares Checks Paying Until September 2009](#).

COUNTS

Count 22 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection systems to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 23 - 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 honest services upon national banking and financial associations, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 24 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 25 - Andy Hall, Hall & Lamb, *et al.*, did knowingly and intentionally, submit and transmit, a certain fraudulent BRIDGELOAN Demand Letter of November 23, 2009, to further a known criminal scheme depriving and extorting Tavares of properties and rights relating to a sham BRIDGELOAN and BNY Mellon loan, to wit, by using U.S. Mail to transmit the aforesaid Demand Letter to Tavares, and Tavares' Companies at 444 Brickell Ave., Suite 415, Miami, FL 33131, in violation of, 18, U.S.C., § 1341.

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

Count 27 - The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by using, among other things, Sham Loans by BRIDGELOAN and BNY Mellon to entrap and defraud borrower Tavares and Tavares' Companies, continuously and systematically using artifices to devalue Tavares' collateral properties securing the loan, having BRIDGELOAN's Associates and partners, among others, Stephen Ames Freeman, Robert Michael Haber, Marco Emilio Rojas, Nicholas Stanham, falsely representing Tavares in the BRIDGELOAN and BNY Mellon loan, never disclosing they are Associates and partners of BRIDGELOAN and in several other competing real estate and investment businesses, and never disclosing they are Associates in a Transnational Continued Criminal Enterprise depriving, stealing and extorting Tavares and Tavares' investors, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 28 – Andy Hall, Hall & Lamb, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort the client Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services, furthering major underlying criminals schemes of extortion, bank and mortgage frauds, intercontinental money laundering of illicit funds through the United States of America, trust account frauds, false and conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
29	December 1, 2009 at 10:43 AM	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Nelson Slosbergas Renato Ochman Daniel Citron Tishman Speyer Bridgeloan Investors, Inc. The Continued Criminal Enterprise
30		§ 241 Conspiracy Against Rights &	
31		§ 1346 Scheme/Artifice to Defraud &	
32		§ 1343 Wire Fraud &	
33		§ 1961 <i>et seq.</i> – RICO &	
34		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
35		FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	

On December 1, 2009, at 10:43 a.m., as part of a scheme by a Transnational Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”), extorting borrower [Charles Tavares](#) (“Tavares”) of properties and rights, in a sham \$12 million loan (“Sham Loan”) by the CCE’s Bridgeloan Investors, Inc., a Florida corp. (“BRIDGELoAN”), and Mellon United National Bank, N.A. n.k.a. The Bank of New York Mellon (“BNY Mellon”), [Daniel Citron](#)⁶⁷ (“Daniel Citron”) at [Tishman Speyer](#) Brazil (“Tishman Speyer”) in Brazil (dcitron@tishmanspeyer.com.br), submits via email across country lines to [Joseph Horn](#) (“Horn”) at BRIDGELoAN ([joseph@h2e.com](#)) in Miami, a sham \$8 million offer (“Sham Offer”) from [Renato Ochman](#) (“Renato Ochman”) in São Paulo, Brazil, to purchase one of two collateral properties securing borrower Tavares’s Sham Loans, the 2.4 Acres Brickell Village buildings (“Brickell Property”) owned by Tavares’ Brickell Village One, LLC, a Florida L.L.C. (“B V One”) and 2147 S.W. 8 Street, LLC (“2147”), [valued](#) and [appraised over \\$20 million](#). The sham loan scheme consists of BRIDGELoAN’s partners and/or attorneys, among others, [Stephen A. Freeman](#) (“Freeman”), [Robert Michael Haber](#) (“Haber”), [Nelson Slosbergas](#) (“Slosbergas”), [Marco Emilio Rojas](#) (“Rojas”), [Nicholas Stanham](#), and Associate [Thomas Ralph Lehman](#) to represent the unsuspecting client/ victim Tavares for years, including in the Sham Loan, earning Tavares’ trust, and gathering intelligence on Tavares’ assets, investors and partners, in order to entrap Tavares in the Sham Loans using, *e.g.*, BRIDGELoAN’s powerful enabler BNY Mellon and other Associates, to defraud, steal, and extort Tavares of all properties and rights. Then, the CCE’s Associates, continuously interfere with the loan by systematically undermining with sham appraisals and offers to devalue the collateral properties in the eyes of Tavares’ investors and partners, and third parties, by spreading false rumors, interfering, and threatening Tavares’ tenants, and extorting Tavares, Tavares’ attorneys, and partners not to fight the scheme, so BRIDGELoAN’s CCE successfully deprives, steals, and extorts all of Tavares’ properties and rights. Horn, to further undermining the value of the collateral properties securing the Sham Loans, forwards, on [December 1, 2009, at 10:52 a.m.](#), Renato Ochman’s Sham Offer to Tavares’ investor Romulo Pina Dantas (“Dantas”), and c.c. borrower Tavares, to further the extortion.

⁶⁷ It is now known that, Daniel Citron at Tishman Speyer is a former director and CFO of Horn’s family’s [Cyrela Brazil Realty](#) (“CYRELA”) (Stock [OTCMKTS](#): CYRBY), and that Renato Ochman is an attorney and friend of Horn, and that they jointly and together fabricated the sham offer to further the scheme depriving, stealing, and extorting Tavares of properties and rights.

COUNTS

Count 29 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection systems to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 30 - 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 honest services upon national banking and financial associations, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 31 - 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 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 18 U.S.C. §1346.

Count 32 - [Daniel Citron at Tishman Speyer Brazil, and Renato Ochman](#), did knowingly and intentionally, submit and transmit via wire, from Brazil to the United States, across country lines, using the email address dcitron@tishmanspeyer.com.br to Joseph Horn's email address at joseph@h2e.com, on December 1, 2009 at 10:43 a.m., a certain Sham Offer to purchase Charles Tavares' Brickell Village Buildings in Miami, Florida, for \$8 million dollars, to willfully devalue certain Tavares' properties securing a Sham \$12 million Loan with Bridgeloan Investors, Inc., a Florida corp. and Mellon United National Bank, N.A. n.k.a. The Bank of New York Mellon ("BNY Mellon"), to further the known ongoing scheme extorting Tavares of properties and rights in the United States of America, in violation of 18 U.S.C. §1343.

Count 33 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 34 - The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Tavares of properties and rights by using, among other things, Sham Loans by BRIDGELOAN and BNY Mellon to entrap and defraud borrower Tavares and Tavares' Companies, continuously and systematically using artifices to devalue Tavares' collateral properties securing the loan, having BRIDGELOAN's Associates and partners, among others, Stephen Ames Freeman, Robert Michael Haber, Marco Emilio Rojas, Nicholas Stanham, falsely representing Tavares in the BRIDGELOAN and BNY Mellon loan, never disclosing they are Associates and partners in BRIDGELOAN and in several other competing real estate and investment businesses, and never disclosing they are Associates in a Transnational Continued Criminal Enterprise depriving, stealing and extorting Tavares and Tavares' investors, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 35 – Nelson Slosbergas, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort the client Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services, furthering major underlying criminals schemes of extortion, bank and mortgage frauds, intercontinental money laundering of illicit funds through the United States of America, trust account frauds, false and conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

36	December 24, 2009 at 1:41 PM	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Joseph Horn Ralph Horn
37		§ 241 Conspiracy Against Rights &	Ricardo Eichenwald Fernando Braghin
38		§ 1346 Scheme/Artifice to Defraud &	Daniel Ades Nelson Slosbergas
39		§ 1961 <i>et seq.</i> – RICO &	Bridgeloan Investors, Inc. Matthew Paul Leto
40		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	Andrew Clifford Hall Hall, Lamb and Hall, P.A.
41		FLORIDA BAR RULES PROFESSIONAL CONDUCT Misconduct – Rule 4-8.4 (a)(b)(c)(d)	The Continued Criminal Enterprise

On December 24, 2009, [Bridgeloan Investors, Inc., a Florida corp.](#) (“BRIDGELoAN”), an entity used by Associates⁶⁸ of a Transnational Continued Criminal Enterprise⁶⁹ (“CCE” or “Criminal Enterprise”), files, with unclean hands,⁷⁰ represented by [Matthew Paul Leto](#) (“Leto”) and Andrew C. Hall (“Andy Hall”) at Hall, Lamb & Hall, P.A. (“Hall & Lamb”), an [initial sham complaint](#)⁷¹ (“Sham Complaint”) against Charles Tavares (“Tavares”), and Tavares’ Companies Miami River Park Marina, Inc, a Florida corp. (“MRPM”), Brickell Village One, LLC, a Florida L.L.C. (“BV One”), and 2147 SW 8 Street, LLC, a Florida L.L.C. (“2147”). The Sham Complaint, the first of nine (09) Related Cases⁷² by the CCE, stems from the \$12 million Sham Loan (“Sham Loan”) by BRIDGELoAN and The Bank of New York Mellon (“BNY Mellon”) to Tavares, as part of a scheme to deprive, steal, and extort Borrower Tavares of the two separate collateral properties valued more than \$50 million securing the Sham Loan with Tavares personal guaranty.

⁶⁸ See, among others, Associates [Joseph Horn](#) (Horn”), [Ralph Horn](#) (“Ralph”), [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”), and [Daniel Ades](#) (“Ades”).

⁶⁹ The CCE’s underlying schemes includes, among others, intercontinental money laundering of illicit funds though the United States of America, Tax evasion and frauds, bank, mortgage and security frauds, portfolio tax-free bond frauds, extortion of U.S. citizens and companies, corrupting and subverting national institutions to perpetuate the CCE’s businesses with total impunity.

⁷⁰ BRIDGELoAN and BNY Mellon’s loan is part of an underlying scheme to deprive, steal, and extort Tavares of all properties and rights, predicated on having Associates of the CCE, among others, Freeman, Slosbergas, [Robert Michael Haber](#) (“Haber”), [Marco Emilio Rojas](#) (“Rojas”), [Nicholas Stanham](#) (“Shanham”), and [Thomas Ralph Lehman](#) (“Lehman”) to falsely represent, as Tavares’ attorneys and Tavares’ Companies attorneys, for years, to entrap unsuspecting client/victim Tavares, allowing BRIDGELoAN’s extortion of Tavares upon court sham proceedings used to deprive and steal Tavares’ properties and rights.

⁷¹ The contradictory [Sham Complaint](#), styled *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al., Case No. 09-93058-CA-30*, falsely states, among other things, that: *On or about July 21, 2007, BRIDGELoAN authorized a loan to Defendants, Tavares, et al., in the original amount of \$7 million; On July 2, 2007, and pursuant a Future Advance of \$5 million, the total amount of the loan owed by Tavares, et al., increases to \$12 million.* In support of BRIDGELoAN’s Sham Complaint, Horn knowingly and intentionally, signs a [facially fraudulent Affidavit of 11/23/2009](#), falsely stating that BRIDGELoAN [did not receive interest payments from February 2009, through September 2009](#), and falsely inflating interest owed from February 2009, to November 2009, in the amount of \$3,744,666.67, as part of the CCE’s **Omertà Code**, as Associates willfully commit crimes upon the courts to show their commitment to the scheme, further preventing them from betraying the CCE in the future.

⁷² See, the [Related Cases](#), by the CCE, systematically depriving, stealing, and extorting Tavares of all properties and rights in sham proceedings upon Florida courts, to silence Tavares, allowing the CCE’s continued absolute impunity.

COUNTS

Count 36 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, and Judicial systems to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 37 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 38 - 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 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 18 U.S.C. §1346.

Count 39 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 40 - 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 fabricating, among other things, a [facially fraudulent Affidavit of Joseph Horn \("Horn"\) of November 23, 2009](#), on behalf of BRIDGELOAN, in support of false claims contained in BRIDGELOAN's Sham Complaint filed by Matthew Paul Leto ("Leto") and Andrew C. Hall ("Andy Hall") at Hall, Lamb & Hall, P.A. ("Hall & Lamb"), in violation of, §817.155, F.S. (Fraudulent Practices), further, knowingly and intentionally, committing violations of:

Count 40(a) - Perjury in Official Proceeding by Horn, BRIDGELOAN, Leto, Andy Hall, Hall & Lamb, *et al.*, to further the scheme to deprive and extort Tavares of properties in sham proceedings upon courts of law in the United States of America, by knowingly and intentionally, falsely stating in the [Sham Complaint](#), supported by [Horn's Fraudulent Affidavit of November 23, 2009](#), as part of the

scheme, that, **(a)** “On or about July 21, 2007, BRIDGELOAN INVESTORS, INC. (“BRIDGELOAN”), authorized a loan to Defendants, MIAMI RIVER PARK MARINA, INC. (“MIAMI RIVER”), BRICKELL VILLAGE ONE, LLC (“BRICKELL”), and 2147 SW 8 STREET, LLC (“2147 SW 8 STREET”), in the original principal amount of Seven Million Dollars (\$7,000,000.00) (the “Loan”), see [Sham Complaint](#) {Leto’s Document #MPL\00137088.1} p. 2 at ¶ 10.

Count 40(b) - Perjury in Official Proceeding by Horn, BRIDGELOAN, Leto, Andy Hall, Hall & Lamb, *et al.*, to further the scheme to deprive and extort Tavares of properties in sham proceedings upon courts of law in the United States of America, by knowingly and intentionally, falsely stating, as part of the scheme, that, **(b)** “On July 2, 2007 and pursuant to a Future Advance of \$5,000,000, the total principal amount of the loan owed by MIAMI RIVER, BRICKELL, and 2147 SW 8 STREET increased to \$12,000,000.00,” see [Sham Complaint](#) {Leto’s Document #MPL\00137088.1} p. 3 at ¶ 12.

Count 41 – Matthew Paul Leto, Andrew C. Hall, et al., at Hall, Lamb & Hall, P.A., and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, trust account frauds, false and conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions to further extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, 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.

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](#).

* 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](#).

* In July 2005, as part of an elaborate artifice in the underlying scheme by Associates of the Criminal Enterprise, among others, criminals Thomas R. Lehman ("Lehman") (Florida Bar No. 351.318), and Marco E. Rojas ("Rojas") (Florida Bar No. 940.453), both representing unsuspecting client Tavares upon the United States Bankruptcy for the Southern District of Florida ("Bankruptcy Court"), in a case presided by Judge Robert A. Mark ("Judge Mark") (Florida Bar No.260.886), where Tavares is buying a certain 9 acres Miami River Property at 2051 N.W. 11 Street, Miami, Florida 33125 ("Marina Property") – one of two Properties later extorted from Tavares in the BRIDGELOAN Case, from Consolidated Yacht Corporation ("Consolidated") (Tax Id. #65-0242347), having Alan L. Goldberg ("Trustee Goldberg"), and Ross Robert Hartog ("Hartog") (Florida Bar No. 272.360) at Markowitz Trustee, as Consolidated's Registered Agent, see www.sunbiz.org, at Document #S28046, 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

42	January 28, 2010 at 3:43 PM	U. S. CODE TITLE 18	Thomas Ralph Lehman LKLS+G, LLP The Continued Criminal Enterprise
43		§ 371 Conspiracy to Defraud the USA &	
44		§ 241 Conspiracy Against Rights &	
45		§ 1346 Scheme/Artifice to Defraud &	
46		§ 1341 Mail Fraud &	
47		§ 1961 <i>et seq.</i> – RICO &	
48		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & FLORIDA BAR RULES PROFESSIONAL CONDUCT Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On January 28, 2010, [Thomas R. Lehman](#) (“Lehman”) and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), falsely representing⁷³ client/victim Charles Tavares (“Tavares”), and Tavares’ Companies Miami River Park Marina, Inc., a Florida corp. (“MRPM”), Brickell Village One, LLC, a Florida L.L.C. (“BV One”), and 2147 SW 8 Street, LLC, a Florida L.L.C (“2147”) (collectively “Tavares’ Companies”), file, on behalf of Tavares personally, and Tavares’ Companies, [sham Answers and Affirmative Defenses](#)⁷⁴ (“LKLS+G’s Sham Defenses”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al.*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” case) before the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”). LKLS+G’s Sham Defenses does not rebut BRIDGELOAN’s Sham Complaint, nor moves to dismiss the facially and factually fraudulent pleadings supported by, *e.g.*, millions in inflated claims. Lehman & LKLS+G, at all times relevant, knew that BRIDGELOAN and its partners and attorneys, among others, Horn, [Ralph Horn](#) (“Ralph”), [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Daniel Ades](#) (“Ades”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen Ames Freeman](#) (“Freeman”), [Robert Michael Haber](#) (“Haber”), [Marco E. Rojas](#) (“Rojas”) and [Nicholas Stanham](#) (“Stanham”) are Associates of a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and that they have willfully entrapped Tavares in a Sham Loan with BRIDGELOAN and [The Bank of New York Mellon](#) (“BNY Mellon”) to defraud and extort Tavares of all properties and rights. As part of the scheme, Lehman and LKLS+G file Tavares’ Sham Defenses to show to other Associates Lehman and LKLS+G commitment to the scheme, showing the sham proceedings already vitiated by fraud upon the court, by officers of the court perpetrating extrinsic frauds to deprive and extort Tavares.

⁷³ Lehman is introduced in 2005 to unsuspecting client/victim Tavares by Rojas, and at all times relevant, Lehman and wife [Amy Lehman](#) (“Amy”) are conning Tavares and Tavares’ family into [trusting Lehman and Amy](#) so the CCE can easily extort Tavares.

⁷⁴ Lehman and other Associates of the CCE, use their Florida Bar licenses as guise to perpetrate crimes upon courts of law in the United States, using a simple codes upon the proceedings, or the CCE’s **Omertà Code**, by filing systematically erroneous claims contradicting truth and supporting exhibits, showing the Associates leaving the sham claims unchecked to make sure all officers of the courts are fully onboard with the scheme, and filing [Miami River Marina Park, Inc.](#) contrary to correct [Miami River Park Marina, Inc.](#), while Lehman conspires with, among others, [Lehman’s appraiser](#) to devalue client Tavares’ [MRPM](#) & [BV One](#) properties with bogus values for [MRPM](#) and [BV One](#) – contrary to truth and market value at the time, to willfully further BRIDGELOAN’s schemes depriving and extorting Tavares’ MRPM and BV One Properties valued over \$50 million.

COUNTS

Count 42 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, and corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 43 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 44 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 45 - Thomas Ralph Lehman ("Lehman") and Levine Kellogg Lehman Schnieder + Grossman, LLP ("LKLS+G"), falsely representing Charles Tavares personally, and Tavares Companies Miami River Park Marina, Inc., a Florida corp., Brickell Village One, LLC, a Florida L.L.C, and 2147 SW 8 Street, LLC, a Florida L.L.C., to further a brazen criminal scheme defrauding, stealing, and extorting Tavares of all properties and rights upon corrupted and subverted civil proceedings in a court of law in the United States of America, did knowingly and intentionally, submit and transmit, on January 28, 2011, certain fraudulent documents, as part of the scheme – to wit, "[*Answer and Affirmative Defenses of Defendants Miami River Marina Park \[sic\], Inc., Brickell Village One, LLC, 2147 SW 8 Street, and Charles Tavares*](#)", via U.S. Mail, to, "[*Mathew P. Leto, Attorneys for Plaintiff, Hall, Lamb and Hall, P.A., Offices at Grand Bay Plaza, 2665 Bayshore Drive, Penthouse 1, Miami, Florida 33131*](#)", in violation of, 18, U.S.C., § 1341.

Count 46 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 47 - 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 filing with the Eleventh Judicial Circuit for Miami-Dade County, Florida (“Miami Courts”), among other things, certain sham pleadings of January 28, 2010 in the Sham Bridgeloan Case, on behalf of client/victim Tavares, “[*Answer and Affirmative Defenses of Defendants Miami River Marina Park \[sic\], Inc., Brickell Village One, LLC, 2147 SW 8 Street, and Charles Tavares*](#)”, to further the scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 48 – Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, trust account frauds, false and conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions to further extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at [www.floridabar.org](#).

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

49	May 6, 2010	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Joseph Horn Ralph Horn
50		§ 241 Conspiracy Against Rights &	Ricardo Eichenwald Fernando Braghin
51		§ 242 Deprivation of Rights Under Color of Law &	Nelson Slosbergas Jeffrey B. Flick
52		§ 1346 Scheme/Artifice to Defraud &	Francisco Ruiz Flick Mortgage Investors
53		§ 1961 <i>et seq.</i> – RICO &	Marco Emilio Rojas The Bank of New York Mellon
54		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	Allan Lester Langer Miami Courts The Continued Criminal Enterprise

On May 6, 2010, as part of an underlying scheme⁷⁵ depriving and extorting Charles Tavares (“Tavares”) of properties and rights in sham proceedings vitiated by frauds by officers of the court, in the sham Related Case styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al.*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” case) before the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), The Bank of New York Mellon (“BNY Mellon”) files a foreclosure suit against Tavares, *The Bank of New York Mellon, as Trustee for the Certificate Holders CWALT, Inc., Alternative Loan Trust 2006-OA21, Mortgage Pass-Through Certificates, Series 2006-OA21 v. Charles Tavares*, Case No. 2010-26864-CA-30 (“BNY Mellon” Case) stemming from original mortgages by Flick Mortgage Investors, Inc., a Florida corp. (“Flick Mortgage”). [Flick Mortgage](#) is an entity used by BRIDGELOAN’s Transnational Continued Criminal Enterprise⁷⁶ (“CCE” or “Criminal Enterprise”). To further the scheme, Flick Mortgage assigns Tavares’ mortgage to BRIDGELOAN’s associate BNY Mellon, and further causes the Miami Courts to assign reckless corrupt Judge Allan Lester Langer (“Judge Langer”), already corruptly presiding the sham BRIDGELOAN Case to preside the BNY Mellon to continue extorting Tavares. At all relevant times, client/borrower/victim Tavares is corruptly surrounded by criminals disguised as attorneys and lenders to deprive, steal, and extort Tavares of all properties and rights.

⁷⁵ On July 21, 2005, BRIDGELOAN’s CCE entraps Tavares in the BRIDGELOAN Case to extort Tavares of over \$50 million dollars, after having failed in 2002 to successfully extort Tavares of a certain Brickell Premier Property at 218 S.E. 14 Street, Brickell East, Miami, Florida 33131, using the CCE’s standard artifices of surrounding the victims with Associates of the CCE pretending to be attorneys for the victims, and using sham lending entities to entrap the borrowers/victims, *e.g.*, BRIDGELOAN, followed by torts to interfere with the loan and with investors of the borrowers, and preventing deals. Now, BRIDGELOAN, learning from its past errors, surreptitiously and corruptly entraps victim Tavares with another sham loan for Tavares’ homestead property with sham lender Flick Mortgage, an entity controlled by, among others, BRIDGELOAN’s Associates to overwhelm the victim.

⁷⁶ Among other Associates of the CCE, [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”), [Robert Michael Haber](#) (“Haber”), [Marco E. Rojas](#) (“Rojas”), [Nicholas Stanham](#) (“Stanham”), and [Joseph Horn](#) (“Horn”), [Ralph Horn](#) (“Ralph”) [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Daniel Ades](#) (“Ades”), and Bridgeloan Investors, Inc., a Florida corp. (Tax ID. #65-0665516), Bridgeloan Partners Corp., a Florida corpor. n.k.a. H2A Capital Corp., a Florida corp. (Tax Id. #86-3280908) (collectively “BRIDGELOAN”), and Jeffrey B. Flick (“Jeff Flick”), Sandra Flick (“Sandra”), and Francisco Ruiz (“Ruiz”) at Flick Mortgage Investors, Inc., a Florida corp. (“Flick Mortgage”) (Tax Id. #59-2936881). Some of their ongoing criminal rackets include intercontinental money laundering of hundreds of millions of dollars of illicit funds through the United States of America, tax frauds, portfolio tax-free bond frauds, mortgage and bank fraud, systematic deprivation and extortion of citizens and U.S. companies, and the subversion and corruption of the judicial and political machinery in Florida, and elsewhere they operate, to further underlying criminal schemes with absolute impunity. See [Tavares’s Affidavit 11/27/2022](#).

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](#).

COUNTS

Count 49 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, and corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 50 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 51 – Nelson Slosbergas, The Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), Judge [Allan Lester Langer](#), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 52 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 53 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 54- The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Charles Tavares (“Tavares”) of properties and rights by filing with the Eleventh Judicial Circuit for Miami-Dade County, Florida (“Miami Courts”), among other things, entrapping borrower/client Tavares with sham loans to extort Tavares of all properties and rights, following systematic torts to cause the loans in default, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

55	June 22, 2010	<u>U. S. CODE TITLE 18</u>	Allan Lester Langer Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. The Continued Criminal Enterprise
56		§ 371 Conspiracy to Defraud the USA &	
57		§ 241 Conspiracy Against Rights &	
58		§ 242 Deprivation of Rights Under Color of Law &	
59		§ 1961 <i>et seq.</i> – RICO &	
60		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>FLORIDA CODE OF JUDICIAL CONDUCT</u> Violations of Canons 1, 2, and 3	

On June 22, 2010, Judge [Allan Lester Langer](#) a.k.a. Lester Langer (“Judge Langer”), in reckless disregard for the truth and record displayed showing sham pleadings containing patently false and contradictory claims by [Bridgeloan Investors, Inc., a Florida corp.](#) (“BRIDGELoAN”), an entity used by Associates of a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), represented by [Matthew Paul Leto](#) (“Leto”) and Andrew C. Hall (“Andy Hall”) at Hall, Lamb & Hall, P.A. (“Hall & Lamb”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al.*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” case) before the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), enters, to further the scheme depriving and extorting Charles Tavares (“Tavares”), an [Order Granting Defendants’ Motion for Protective Order Rescheduling the Deposition of Defendant Charles Tavares](#)⁷⁷ (“Order Rescheduling Tavares’ Deposition”). In the Order Rescheduling Tavares’ Deposition, Judge Langer, states, among other things, that: *“The Court having reviewed and considered the Motion for Protective Order, having reviewed the record in this matter, and otherwise being fully advised in the premises, it is ORDERED and ADJUDGED as follows: Defendants’ Motion for Protective Order is GRANTED. The Deposition of Charles Tavares is rescheduled for June 30, 2010, at 1:30 p.m. without any further continuances. Court reserve on Sanctions. DONE and ORDERED in Chambers at Miami-Dade County, Florida on this 22nd day of June 2010. /s/ Lester Langer Honorable Lester Langer – Circuit Court Judge”*, see Order Rescheduling Tavares’ Deposition. Reckless Judge Langer, attesting having reviewed the record in the matter that clearly shows a scheme upon the court, with material and relevant patent false and contradictory claims by BRIDGELoAN and Hall & Lamb, among others, that: *On or about July 21, 2007, BRIDGELoAN authorized a loan to Defendants, Tavares, et al., in the original amount of \$7 million; On July 2, 2007, and pursuant a Future Advance of \$5 million, the total amount of the loan owed by Tavares, et al., increases to \$12 million”*, shows that truth, facts, and the evidence do not matter, as Judge Langer is knowingly and intentionally enabling and participating in the scheme extorting U.S. citizen Tavares of properties and rights, under color of law, upon sham proceedings.

⁷⁷ After months of inexplicable – at the time, inaction by Tavares’ attorneys [Levine Kellog Lehman Schneider + Grossman, LLP](#) (“LKLS+G”) in filing, *e.g.*, meritorious counterclaims and pleadings showing the legal farce by BRIDGELoAN, *et al.*, [Tavares retains](#), on June 7, 2010, as co-counsel, [Peter W. Homer](#) (“Homer”) and [Luis E. Delgado](#) at [Homer Bonner, P.A.](#) (“Homer & Bonner”), that promptly files on July 20, 2010, a meritorious [Counterclaim against BRIDGELoAN and Third-Party Claim](#) against Tavares’ investor [Romulo Pina Dantas](#) (“Dantas”), that willfully failed obligations to Tavares in the \$12 million Sham Loan.

COUNTS

Count 55 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 56 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 57 - Judge [Allan Lester Langer](#), [Matthew Paul Leto](#), Andrew Clifford Hall, Hall, Lamb and Hall, P.A., and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 58 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 59 - Judge [Allan Lester Langer](#) ("Judge Langer"), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Charles Tavares ("Tavares") of properties and rights by using, under color of law, among other things, the judicial machinery in Florida to perpetrate frauds upon the courts against U.S. citizen Tavares, intentionally and knowingly depriving Tavares of rights under Florida's Constitution to deprive, steal, and extort Tavares of properties and rights, furthering underlying criminal schemes of money laundering illicit moneys through the United States, bank, mortgage, and securities frauds, portfolio tax-free bond frauds, tax frauds, and extortion of U.S. citizens by Bridgeloan Investors' Transnational Continued Criminal Enterprise, by among other things, falsely stating on Judge Langer's [Order Granting Defendants' Motion for Protective Order Rescheduling the Deposition of Defendant Charles Tavares](#) that his decision is based on reviewing the record in the matter – which shows to any reasonable honest observer, frauds upon the court by officers of the courts, perpetrating a scheme to extort Tavares of properties and rights, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 60 – Judge [Allan Lester Langer](#) (“Judge Langer”), 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.

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

61	August 4 2010	U. S. CODE TITLE 18	Marco Emilio Rojas Rojas & Stanham, LLP Alan Samuel Fine Alan S. Fine, P.A. Thomas Ralph Lehman LKLS+G, LLP The Continued Criminal Enterprise
62		§ 371 Conspiracy to Defraud the USA &	
63		§ 241 Conspiracy Against Rights &	
64		§ 1346 Scheme/Artifice to Defraud &	
65		§ 1343 Wire Fraud &	
66		§ 1961 <i>et seq.</i> – RICO &	
67		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & FLORIDA BAR RULES PROFESSIONAL CONDUCT Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On August 4, 2010, at 9:47 a.m., Charles Tavares' ("Tavares") longtime personal and corporate attorney, Marco E. Rojas ("Rojas") (MROjas@rsmiami.com), unknown to Tavares at the time, an Associate of a Transnational Continued Criminal Enterprise⁷⁸ ("CCE" or "Criminal Enterprise"), to further a scheme depriving and extorting client/victim Tavares of properties and rights, E-mails, in reference to "MRPM and Brickell Village One LLC", Lehman (trl@lklaw.com) at Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Tavares' personal and corporate attorneys representing Tavares in the styled-action Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al., Case No. 2009-93058-CA-30 ("BRIDGELOAN" Case), before the Eleventh Judicial Circuit in Miami-Dade County, Florida ("Miami Courts"), c.c. Fine (AFine@fine-law.com) at Alan S. Fine, P.A., stating, among other things, that, "Tom, Alan [Fine] and I left you a message. Alan is going to represent Romulo Pina Dantas". On August 4, 2010 at 9:53 a.m., or about six (06) minutes after Rojas' email to Lehman, Lehman replies to Rojas, c.c. Fine, without ever first consulting client Tavares, that: "Will call back today. There is not written appraisal of the properties^[79] yet. Thomas R. Lehman." Here, the record shows the CCE's Associates representing the unsuspecting client/victim Tavares, and now also representing Tavares' investor Dantas, in the sham BRIDGELOAN Case, all in an intentional fatal conflict of interest,⁸⁰ as Rojas, Lehman, Fine, BRIDGELOAN's principals Horn, Ralph, Eichenwald, Braghin, Ades, Slosbergas, *et al.*, are all Associates of the same CCE, furthering a scheme depriving and extorting Tavares of properties and rights upon sham proceedings.

⁷⁸ Among other Associates of the CCE, Joseph Horn ("Horn"), Ralph Horn ("Ralph"), Ricardo Eichenwald ("Eichenwald"), Fernando Braghin ("Braghin"), Daniel Ades ("Ades"), Nelson Slosbergas ("Slosbergas"), Stephen Ames Freeman ("Freeman"), Robert M. Haber ("Haber"), Alan Samuel Fine ("Fine"), Nicholas Stanham ("Stanham"), and Thomas R. Lehman ("Lehman").

⁷⁹ As part of the scheme, Lehman tricks Tavares to believe Lehman has to retain the appraiser for appraisals for Tavares' properties, picking an associate appraiser in order to jointly and together with the appraiser, devalue Tavares' properties.

⁸⁰ Rojas, Freeman, Haber, Stanham, Slosbergas, and Fine, all Tavares' longtime attorneys, and unknown to Tavares at the time, are also longtime attorneys and Associates of BRIDGELOAN and Associates of the CCE, perpetrating, *inter alia*, intercontinental money laundering of illicit funds through the USA, tax frauds, bank, mortgage and securities frauds, and extortion. The record now, after discovery obtained on Tavares' Malpractice Suit against Lehman & LKLS+G, see Related Case No. 2013-12223-CA-40, shows that, at all times relevant, Rojas, Lehman, Fine, *et al.*, are conspiring to extort Tavares of properties and rights.

COUNTS

Count 61 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, and corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 62 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 63 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 64 - Marco Emilio Rojas ("Rojas"), Rojas & Stanham, LLP ("R&S"), Alan Samuel Fine ("Fine"), Alan S. Fine, P.A. ("Fine Law"), Thomas Ralph Lehman (Lehman"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, electronic communications, to wit – among others, certain [E-mails](#) of; **(64a)** Wednesday, August 4, 2010 at 9:47 a.m., from Rojas at MRojas@rsmiami.com to Lehman at trl@lkllaw.com, c.c. Fine at AFine@fine-law.com; and, **(64b)** Wednesday, August 4, 2010 at 9:53 a.m., from Lehman at trl@lkllaw.com to Rojas at MRojas@rsmiami.com, c.c. Fine at AFine@fine-law.com, in violation of, 18, U.S.C., § 1343.

Count 65 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 66 - 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 submitting, among other things, certain email messages of August 4, 2010 at 9:47 a.m. and 9:53 a.m., to further the scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 67 – Marco Emilio Rojas (“Rojas”), Rojas & Stanham, LLP (“R&S”), Alan Samuel Fine (“Fine”), Alan S. Fine, P.A. (“Fine Law”), Thomas Ralph Lehman (Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, trust account frauds, false an conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions to further extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
68	August 5, 2010	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Manuel Vidal Deering Capital Joseph Horn
69		§ 241 Conspiracy Against Rights &	Ralph Horn Ricardo Eichenwald
70		§ 1346 Scheme/Artifice to Defraud &	Fernando Braghin Daniel Ades
71		§ 1951 Extortion (Hobbs Act) &	Nelson Slosbergas Bridgeloan Investors, Inc.
72		§ 1961 <i>et seq.</i> – RICO &	Sergio Capela de Almeida Hugo Barreto Del Priore
73		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	Marco Antonio de Souza The Continued Criminal Enterprise

On August 5, 2010, [Manuel Vidal](#) (“Manuel Vidal”), at [The Deering Capital, LLC](#), a Florida L.L.C.⁸¹ (“Deering Capital”), acting as an agent of [Bridgeloan Investors, Inc., a Florida corp.](#) (“BRIDGELOAN”), and [BANIF Mortgage Company](#) a.k.a. [BANIF Finance \(USA\)](#) (“BANIF”)⁸² a.k.a. [Riviera Capital USA Corp.](#) a.k.a. [Weston Capital USA Corp.](#)⁸³ (Tax Id. #32-0006395) (“BANIF”), longtime Associates of a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), furthering a brazen criminal scheme depriving and extorting Charles Tavares (“Tavares”) of properties and rights, relating to Sham Loans by BRIDGELOAN & Mellon United National Bank, N.A. a.k.a. The Bank of New York Mellon (“BNY Mellon”), knowingly and intentionally, trespass on Tavares’ properties located at 2051 NW 11 Street, Miami, FL 33125 (“Miami River Marina”). After illegally trespassing, Manuel Vidal,⁸⁴ to further the scheme, approaches Tavares’ Tenant, David Fluss (“Fluss”) from Palofmine, Inc. (“Tavares’ Tenant”), at the Miami River Marina Property, identifying himself as an Agent of BRIDGELOAN, and, *e.g.*, starts intimidating and coercing Tavares’ Tenant by issuing threats that BRIDGELOAN will be taking Tavares’ Miami River Marina Property, and Tavares’ Tenant should not lease the Property. Manuel Vidal, after being directed by Fluss to leave the property for unlawfully trespassing and making threats, walks away taking pictures from inside the Miami River Marina Property. The record shows BRIDGELOAN’s CCE systematically and repeatedly intimidating, coercing, and extorting Tavares, Tavares’ Tenants, Tavares’ investors and partners, appraisers of Tavares’ properties, attorneys, and judges, to deprive, steal, and extort Tavares’ collateral properties, valued over \$50 million, securing the Sham Loans. See [David Fluss Affidavit](#).

⁸¹ F.k.a. [CSF Real Estate Group, LLC, a Florida L.L.C.](#), a.k.a. [Deering Companies, LLC, a Florida L.L.C.](#) (collectively “Deering Capital”), showing, among others, Irving A. Padron Jr. a.k.a. Irving Padron (“Irving Padron”) as principal, and, among others, [Alberto J. Xiques](#) (“[Alberto Xiques](#)”) as an attorney/agent of Deering Capital.

⁸² BRIDGELOAN’s CCE, after hijacking [BANIF](#), and swindling over \$800 million dollars of assets and securities from BANIF, uses its Global financial, securities, and real estate entities, and Associates, to continue, to this date, laundering billions of dollars through the USA, tax evading and defrauding, and paying bribes to politicians and judges in the USA, and elsewhere.

⁸³ Among other Associates of the CCE, BANIF shows, [Hugo Del Priore](#) (“Del Priore”), [Sergio de Almeida Capela](#) (“Capela”), [Artur da Silva Fernandes](#) (“Artur Fernandes”) [Marco Antonio de Souza](#) (“De Souza”), [Nelson Slosbergas](#) (Slosbergas”), [Edward DeCaso](#) (“DeCaso”) [Horacio Cruz](#) (“Cruz”), and [Alfredo Domingo Xiques](#) (“Alfred Xiques”) as an attorney and agent of BANIF.

⁸⁴ It is not known if Manuel Vidal is related to [Espirito Santo Bank’s](#) manager [Raul A. Vidal](#) (“Vidal”), the manager for Freeman Haber Rojas & Stanham’s (“FHR&S”) [Trust Accounts](#) used to money launder billions of dollars of illicit funds through the USA, including more than [\\$461 million dollars for Peruvian Drug lord Fernando Zevallos Gonzales](#) (“Zevallos Gonzales”).

COUNTS

Count 68 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, and corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 69 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 70 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 71 - Manuel Vidal, Deering Capital, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., a Florida corp., Sergio de Almeida Capela, Hugo Barreto Del Priore, Artur da Siva Fernandes, Marco Antonio de Souza, Edward DeCaso, Horacio Cruz, BANIF, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically and repeatedly, coerce, intimidate, and extort Charles Tavares ("Tavares") of properties and rights, in order to further a continuous scheme depriving stealing, and extorting Tavares' properties, further engaging in monetary transactions in Tavares' properties derived from specified unlawful activity, selling and transferring the aforesaid properties across state lines, and successfully stealing millions of dollars in ill-gotten proceeds, money laundering the ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

Count 72 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 73 - The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Charles Tavares (“Tavares”) of properties and rights by, among other things, systematically and repeatedly, intimidating, coercing and extorting Tavares, Tavares’ Tenant David Fluss, Tavares’ investors and partners, Tavares’ attorneys, Tavares’ appraisers, and others, to further a successful extortion of Tavares’ properties securing a Sham Loan by Bridgeloan Investors, Inc., a Florida corp. and Mellon United National Bank, N.A. n.k.a. The Bank of New York Mellon (“BNY Mellon”), in violation of, §817.155, F.S. (Fraudulent Practices).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
74	August 16, 2010 at 3:22 PM	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Nelson Slosbergas Bridgeloan Investors, Inc. The Continued Criminal Enterprise
75		§ 241 Conspiracy Against Rights &	
76		§ 242 Deprivation of Rights Under Color of Law &	
77		§ 1346 Scheme/Artifice to Defraud &	
78		§ 1341 Mail Fraud &	
79		§ 1961 <i>et seq.</i> – RICO &	
80		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
81		FLORIDA BAR RULES PROFESSIONAL CONDUCT Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On August 16, 2010, [Bridgeloan Investors, Inc., a Florida corp.](#) (“BRIDGELOAN”), an entity used by Associates of a Transnational Continued Criminal Enterprise⁸⁵ (“CCE” or “Criminal Enterprise”), represented by [Matthew Paul Leto](#) (“Leto”) and Andrew C. Hall (“Andy Hall”) at Hall, Lamb & Hall, P.A. (“Hall & Lamb”), files, with unclean hands, [Plaintiff’s Answer and Affirmative Defenses to Defendant, Miami River Park Marina, Inc.’s Counterclaim](#)⁸⁶ (“BRIDGELOAN’s Answers & Defenses”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al.*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) before the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”). BRIDGELOAN, Leto, Hall, and Hall & Lamb, knowingly and intentionally, falsely deny, to further the scheme, the truth and facts showing, among other things, BRIDGELOAN systematically interfering with the loans by engaging in efforts to devalue the properties securing Tavares’ loans with sham appraisals and sham offers from associates of BRIDGELOAN to devalue Tavares’ properties, and repeatedly and systematically coercing Tavares’ investor Dantas and others, and having BRIDGELOAN’s Elias A. Barreto (“Barreto”), see E-filing #46357118, on BRIDGELOAN Case No. 2009-93058-CA-30 at pg.11 at ¶ 15., unduly coercing Dantas to stop funding the loan interest payments to falsely “*strong-arm*” BRIDGELOAN into negotiating by causing a default on the loan, and surrounding Tavares and Dantas by Associates of BRIDGELOAN, *inter alia*, [Freeman](#), [Slosbergas](#), [Marco E. Rojas](#), [Alan Samuel Fine](#), *et al.*, to easily extort client/borrower/victim Tavares of properties and rights.

⁸⁵ See, among others, Associates [Joseph Horn](#) (Horn”), [Ralph Horn](#) (“Ralph”), [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”), and [Daniel Ades](#) (“Ades”). See [Tavares’ Affidavit of 11/27/2022](#).

⁸⁶ Tavares’ co-counsels [Peter W. Homer](#) (“Homer”) and [Luis E. Delgado](#) (“Delgado”) at Homer & Bonner, P.A.’s (“Homer & Bonner”) file a meritorious [Counter Claim Against BRIDGELOAN and a Third-Party Claim](#) against Tavares’ investor [Romulo Pina Dantas](#) (“Dantas”) for willfully failing his obligations to Tavares relating to the sham BRIDGELOAN loan.

COUNTS

Count 74 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 75 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 76 - [Matthew Paul Leto](#) ("Leto") and Andrew C. Hall ("Andy Hall") at Hall, Lamb & Hall, P.A. ("Hall & Lamb"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort Charles Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 77 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 78 - [Matthew Paul Leto](#) ("Leto") and Andrew C. Hall ("Andy Hall") at Hall, Lamb & Hall, P.A. ("Hall & Lamb"), file the sham [Plaintiff's Answer and Affirmative Defenses to Defendant, Miami River Park Marina, Inc.'s Counterclaim](#) ("BRIDGELOAN's Answers & Defenses") to further a brazen criminal scheme defrauding, stealing, and extorting Tavares of all properties and rights upon corrupted and subverted civil proceedings in a court of law in the United States of America, did knowingly and intentionally, submit and transmit, on August 16, 2010, certain fraudulent documents, to further the scheme – to wit, "[Plaintiff's Answer and Affirmative Defenses to Defendant, Miami River Park Marina, Inc.'s Counterclaim](#)", via U.S. Mail, **Count 78(a)**, to: "*Thomas R. Lehman, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, Florida 33131*"; and, **Count 78(b)**, to: "*Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL, 33134*"; and, **Count 78(c)**, to: "*Luis E. Delgado, Esq., Homer and Bonner, P.A., 1200 Four Seasons Tower, 1441 Brickell Avenue, Miami Florida 33131. /s/ Mathew P. Leto,*" in violation of, 18, U.S.C., § 1341.

Count 79 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record, and [Tavares Sworn Affidavit](#).

Count 80 - 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 filing sham pleadings that they all know in truth and in fact to be false, among others, "[Plaintiff's Answer and Affirmative Defenses to Defendant, Miami River Park Marina, Inc.'s Counterclaim](#)", to further the scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 81 – Matthew Paul Leto ("Leto"), Andrew Clifford Hall ("Andy Hall"), Hall, Lamb and Hall, P.A. ("Hall & Lamb"), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort Charles Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, trust account frauds, false an conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions to further extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

82	From at Least, August 31, 2010, and Continuing	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Romulo Pina Dantas Ricardo Eichenwald Joseph Horn
83		§ 241 Conspiracy Against Rights &	Ralph Horn Fernando Braghin
84		§ 1346 Scheme/Artifice to Defraud &	Daniel Ades Nelson Slosbergas
85		§ 1951 Extortion (Hobbs Act) &	Elias Antonio Barreto Bridgeloan Investors, Inc.
86		§ 1961 <i>et seq.</i> – RICO &	Alan Samuel Fine Marco Emilio Rojas
87		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	Thomas Ralph Lehman LKLS+G, LLP The Continued Criminal Enterprise

On August 31, 2010 at 1:29 p.m., [Ricardo Eichenwald](#)⁸⁷ (“Eichenwald”), a principal, and an Associate of sham Bridgeloan Investors, Inc., a Florida corp.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), to further a scheme extorting Charles Tavares (“Tavares”) of properties and rights, transmits an E-mail to Tavares’ investor Romulo Pina Dantas (“Dantas”), relating to a conspiracy to defraud Tavares in the ongoing litigation in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”). The underlying scheme to extort Tavares of properties involves lenders BRIDGELOAN and Mellon United National Bank, N.A. n.k.a. The Bank of New York Mellon (“BNY Mellon”), lending \$12 million to Tavares, unsuspectingly represented, in intentional fatal conflict of interest, by Associates of BRIDGELOAN’s CCE, among others, [Marco Emilio Rojas](#) (“Rojas”), [Stephen A. Freeman](#) (“Freeman”), Robert Michael Haber (“Haber”), and Thomas Ralph Lehman (“Lehman”) that willful allows Tavares to pledge as collateral securing the loan, two (02) properties valued over \$50 million, followed by systematic torts, interference, coercion and extortion of Tavares, Tavares’ investors and partners, by, among others, Rojas, Lehman, Alan Samuel Fine, Elias A. Barreto, BRIDGELOAN, and its Associates, intentionally causing the loan into default so the CCE can easily extort Tavares, surrounded by criminals using their Florida Bar licenses and banking/mortgage licenses as guise to deprive, steal, and extort. The partial record obtained in 2013 by Tavares, pursuant to discovery on Tavares legal malpractice lawsuit against Lehman and LKLS+G, see Related Case No. 2013-12223-CA-40, shows extensive secret improper back-dealings between lender BRIDGELOAN, borrower Tavares’ investor Dantas, and Tavares’ personal and corporate attorney Rojas, while litigation is ongoing. See [Some Related Emails](#). The record shows that after the [secret back-dealings](#) by BRIDGELOAN and borrower Tavares’ investor Dantas, the Perpetrators, among others, BRIDGELOAN, Rojas, Fine, Lehman, and Dantas, develop an artifice to coerce Tavares to a sham settlement between BRIDGELOAN, Dantas, and Tavares, that would deprive Tavares of most of his properties and rights.

⁸⁷ As part of the scheme, Eichenwald’s daughter, [Nicole Eichenwald](#) Braghin (“Nicole Eichenwald” or “Fernando Braghin’s wife”), [starting July 2006](#), surreptitiously approaches borrower Tavares’ investor Dantas with false pretenses, to enable Eichenwald to start conning, coercing, and extorting Dantas into the scheme depriving Tavares of properties and rights.

COUNTS

Count 82 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 83 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 84 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 85 - Thomas Ralph Lehman ("Lehman"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Alan Samuel Fine, Alan S. Fine. P.A., and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically and repeatedly, coerce, intimidate, and extort Charles Tavares ("Tavares") of properties and rights, in order to further a continuous scheme depriving stealing, and extorting Tavares' properties, further engaging in monetary transactions in Tavares' properties derived from specified unlawful activity, selling and transferring the aforesaid properties across state lines, and successfully stealing millions of dollars in ill-gotten proceeds, money laundering the ill-gotten proceeds, in violation of 18 U.S.C. §1951 (Hobbs Act).

Count 86 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 87 - Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

<u>COUNT</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
88	September 1, and 2, 2010,	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Romulo Pina Dantas Ricardo Eichenwald Joseph Horn
89		§ 241 Conspiracy Against Rights &	Ralph Horn Fernando Braghin
90		§ 1346 Scheme/Artifice to Defraud &	Daniel Ades Nelson Slosbergas
91		§ 1343 Wire Fraud &	Bridgeloan Investors, Inc. The Continued Criminal Enterprise
92		§ 1961 <i>et seq.</i> – RICO	

On September 1, and 2, 2010, [Ricardo Eichenwald](#) (“Eichenwald”), a principal, and an Associate of sham lender Bridgeloan Investors, Inc., a Florida corp.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), to further a scheme extorting Charles Tavares (“Tavares”) of properties and rights, transmits an [E-Mail](#) to Tavares’ investor [Romulo Pina Dantas](#) (“Dantas”), relating to a conspiracy to defraud Tavares in the ongoing litigation in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”). The record here shows, that, Eichenwald, a principal of sham lender BRIDGELoAN that willfully entrapped borrower/victim Tavares in a \$12 million Sham Loan, together with its associate and co-lender Mellon United National Bank, N.A. n.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), followed by systematically interfering with Tavares’ Sham Loan, investors, and partners, to knowingly and intentionally cause the Sham Loan into default to further deprive and extort Tavares of two (02) separate collateral properties valued over \$50 million securing the Sham Loans, is successfully corrupting Third-Party Defendant into the scheme to deprive and extort Tavares with a sham settlement deal after having surrounded Dantas, to be represented with the CCE’s Associate [Alan Samuel Fine](#) (“Fine”), a criminal using his Florida Bar license as guise to commit crimes. In the [E-mail](#), Eichenwald, from Miami, FL, USA, states: “*Ref. Agreement [88]- Hi Romulo – Do you have an operating agreement or shareholders’ agreement from the entity that owns the Brickell Property? If you have, could you please send me? And appraisals too. Regards. Ricardo Eichenwald – Horn Eichenwald Investments Corp. 2601 South Bayshore Drive, Suite 1200 Miami FL 33133.*” See Eichenwald’s [E-Mail](#) of 9/01/2010 at 10:15 a.m.; and, Romulo’s response E-mail from Brazil: “*Agreement - Ricardo, I tried to speak to you today on your cellular and also in your direct office line and could not, so I left you a message for you to return my calls. Charles [Tavares] has the appraisals, ask your attorney to ask him for a copy. I am 5 hours ahead of your [Miami] time, call me anytime. Sincerely, RP [Romulo Pina]*”. And, on September 2, 2010, at 12:01 a.m., to further the scheme to extort Tavares, Dantas [E-mails](#) BRIDGELoAN’s Eichenwald with a Shareholders’s Agreements for Tavares’ Companies. Shortly thereafter, Tavares’ corrupted attorneys [Thomas Ralph Lehman, et al.](#), and Dantas’ [Alan S. Fine](#), start circulating a proposed sham settlement between Tavares and Dantas to surreptitiously extort Tavares.

⁸⁸ The record displayed here is obtained in discovery, in August 2013, in the legal malpractice suit *Charles Tavares v. Thomas R. Lehman and Levine Kellogg Lehman Schneider + Grossman, LLP*, Case No. 2013-12223-CA-40 (“Lehman & LKLS+G” Case), where Tavares started to see the scope of the conspiracy by Tavares’ own attorneys, together with BRIDGELoAN, Dantas, *et al.* to deprive, steal, and extort Tavares of properties and rights upon subverted proceedings.

COUNTS

Count 88 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 89 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 90 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 91 - Ricardo Eichenwald ("Eichenwald"), Bridgeloan Investors, Inc., a Florida corp. ("BRIDGELoAN"), Romulo Pina Dantas ("Dantas"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights upon subverted proceedings upon Miami Courts, electronic communications, to wit – among others, certain E-mails of; **91(a)** on September 1, 2010 at 10:15 a.m. by Eichenwald at ricardo@h2e.com in Miami, Florida, USA, to Dantas at romulo@bellsouth.net in Brazil; **91(b)** on September 1, 2010 at 9:20 p.m. by Dantas at romulo@bellsouth.net in Brazil, to Eichenwald in Miami, Florida, USA; and, **91(c)** on September 2, 2010 at 12:01 a.m., by Dantas at romulo@bellsouth.net in Brazil, to Eichenwald in Miami, Florida, USA, to further schemes to deprive and extort U.S. citizen Charles Tavares of properties and rights in the United States of America, in violation of 18 U.S.C. §1343.

Count 92 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record, and [Tavares Sworn Affidavit](#).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
93	September 2, 2010,	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA	Romulo Pina Dantas Ricardo Eichenwald
94		& § 241 Conspiracy Against Rights	Joseph Horn Ralph Horn
95		& § 1346 Scheme/Artifice to Defraud	Fernando Braghin Daniel Ades
96		& § 1343 Wire Fraud	Nelson Slosbergas Bridgeloan Investors, Inc.
97		& § 1961 <i>et seq.</i> – RICO	The Continued Criminal Enterprise

On September 2, 2010 at 4:01 a.m., [Ricardo Eichenwald](#) (“Eichenwald”), a principal, and an Associate of sham lender Bridgeloan Investors, Inc., a Florida corp.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), to further a scheme extorting Charles Tavares (“Tavares”) of properties and rights, transmits an [E-mail](#) to Tavares’ investor [Romulo Pina Dantas](#) (“Dantas”), relating to a conspiracy to defraud Tavares in the ongoing litigation in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”). The record here shows, that, Eichenwald, a principal of sham lender BRIDGELoAN that willfully entrapped borrower/victim Tavares in a \$12 million Sham Loan, together with its associate and co-lender Mellon United National Bank, N.A. n.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), followed by systematically interfering with Tavares’ Sham Loan, investors, and partners, to knowingly and intentionally cause the Sham Loan into default to further deprive and extort Tavares of two (02) separate collateral properties valued over \$50 million securing the Sham Loans, is successfully corrupting Third-Party Defendant into the scheme to deprive and extort Tavares with a sham settlement deal after having surrounded Dantas, to be represented with the CCE’s Associate [Alan Samuel Fine](#) (“Fine”), a criminal using his Florida Bar license as guise to commit crimes. In the [E-mail](#), Eichenwald, from Miami, FL, USA, states: “*Ref. Agreement [⁸⁹]- You [Dantas] did not answer if there is a shareholders’ agreement or a management agreement that regulates the relationship between the shareholders and the management of the entity owner of the Brickell property. The information is important for the discussion of alternatives relating to the participation of the minority shareholder. Good night and regards. R. [Ricardo Eichenwald]”. See Eichenwald’s [E-mail](#) of 9/02/2010 at 4:01 a.m.; and, Romulo’s response [E-mail](#) from Brazil: “*Agreement – Call me as soon as you wake up : Charles is the director of the company nominated by me that have 75 per cent of the shares. Sincerely, RP [Romulo Pina]”. See Dantas [E-mail](#) of 9/02/2010 at 3:31 a.m. [Brasilia time] [8:31 a.m. EST] Afterwards, Tavares’ corrupted attorneys, Dantas, and BRIDGELoAN started circulating proposals for a sham settlement to defraud and extort Tavares.**

⁸⁹ The record displayed here is obtained in discovery, in August 2013, in the legal malpractice suit *Charles Tavares v. Thomas R. Lehman and Levine Kellogg Lehman Schneider + Grossman, LLP*, Case No. 2013-12223-CA-40 (“Lehman & LKLS+G” Case), where Tavares started to see the scope of the conspiracy by Tavares’ own attorney together with BRIDGELoAN, Dantas, *et al.* to deprive, steal, and extort Tavares of properties and rights upon subverted proceedings.

COUNTS

Count 93 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 94 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 95 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 96 - Ricardo Eichenwald ("Eichenwald"), Bridgeloan Investors, Inc., a Florida corp. ("BRIDGELoAN"), Romulo Pina Dantas ("Dantas"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights upon subverted proceedings upon Miami Courts, electronic communications, to wit – among others, certain E-mails of; **96(a)** on September 2, 2010 at 4:01 a.m. by Eichenwald at ricardo@h2e.com in Miami, Florida, United States of America, to Dantas at romulo@bellsouth.net in Brazil; and, **96(b)** on September 2, 2010 at 3:31 a.m. Brasilia Time [8:31 a.m. EST] by Dantas at romulo@bellsouth.net in Brazil, to Eichenwald in Miami, Florida, United States of America, to further schemes to deprive and extort U.S. citizen Charles Tavares of properties and rights in the United States of America, , in violation of 18 U.S.C. §1343.

Count 97 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
98	September 6, 2010,	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Romulo Pina Dantas Ricardo Eichenwald Joseph Horn
99		§ 241 Conspiracy Against Rights &	Ralph Horn Fernando Braghin
100		§ 1346 Scheme/Artifice to Defraud &	Daniel Ades Nelson Slosbergas
101		§ 1343 Wire Fraud &	Bridgeloan Investors, Inc. The Continued Criminal Enterprise
102		§ 1961 <i>et seq.</i> – RICO	

On September 6, 2010 at 12:35 p.m., [Ricardo Eichenwald](#) (“Eichenwald”), a principal, and an Associate of sham lender Bridgeloan Investors, Inc., a Florida corp.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), to further a scheme extorting Charles Tavares (“Tavares”) of properties and rights, transmits an [E-mail](#) to Tavares’ investor [Romulo Pina Dantas](#) (“Dantas”), relating to a conspiracy to defraud Tavares in the ongoing litigation in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”). The record here shows, that, Eichenwald, a principal of sham lender BRIDGELOAN that willfully entrapped borrower/victim Tavares in a \$12 million Sham Loan, together with its associate and co-lender Mellon United National Bank, N.A. n.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), followed by systematically interfering with Tavares’ Sham Loan, investors, and partners, to knowingly and intentionally cause the Sham Loan into default to further deprive and extort Tavares of two (02) separate collateral properties valued over \$50 million securing the Sham Loans, is successfully corrupting Third-Party Defendant into the scheme to deprive and extort Tavares with a sham settlement deal after having surrounded Dantas, to be represented with the CCE’s Associate [Alan Samuel Fine](#) (“Fine”), a criminal using his Florida Bar license as guise to commit crimes. In the E-mail, Eichenwald, from Miami, FL, USA, states: “*Ref. China* [⁹⁰]- [www.cncoslight.com](#) Romulo, sorry for the delay. This is the site for the guys for the electric bikes. What do you thing? Ricardo Eichenwald Horn Eichenwald Investments Corp. 2601 South Bayshore Drive, Suite 1200 Miami FL 33133”. See Eichenwald’s [E-mail](#) of 9/06/2010 at 12:35 p.m.; and, Romulo’s response [E-mail](#) from Brazil: “*Okay Ricardo, I tried to speak with Marco Rojas, but today is a holiday there in the United States. I will try tomorrow..*” See Dantas [E-mail](#) of 9/02/2010 at 1:01 p.m. Afterwards, Tavares’ corrupted attorneys, Dantas, and BRIDGELOAN started circulating proposals for a sham settlement to defraud and extort Tavares.

⁹⁰ The record displayed here is obtained in discovery, in August 2013, in the legal malpractice suit *Charles Tavares v. Thomas R. Lehman and Levine Kellogg Lehman Schneider + Grossman, LLP*, Case No. 2013-12223-CA-40 (“Lehman & LKLS+G” Case), where Tavares started to see the scope of the conspiracy by Tavares’ own attorney together with BRIDGELOAN, Dantas, *et al.* to deprive, steal, and extort Tavares of properties and rights upon subverted proceedings. Here, we see Eichenwald and Dantas, simultaneously discussing the scheme to extort Tavares with a sham settlement secretly negotiated behind Tavares’ back, while discussing a Chinese manufacturer of electric bikes. Dantas, at the time was looking to set up a factory of electric bikes in Brazil from a Chinese company, and the side discussions with BRIDGELOAN’s Eichenwald shows conflicted interests.

COUNTS

Count 98 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 99 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 100 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 101 - Ricardo Eichenwald ("Eichenwald"), Bridgeloan Investors, Inc., a Florida corp. ("BRIDGELoAN"), Romulo Pina Dantas ("Dantas"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights upon subverted proceedings upon Miami Courts, electronic communications, to wit – among others, certain E-mails of; **101(a)** on September 6, 2010 at 12:35 p.m. by Eichenwald at ricardo@h2e.com in Miami, Florida, United States of America, to Dantas at romulo@bellsouth.net in Brazil; and, **101(b)** on September 6, 2010 at 1:01 p.m. by Dantas at romulo@bellsouth.net in Brazil, to Eichenwald in Miami, Florida, United States of America, to further schemes to deprive and extort U.S. citizen Charles Tavares of properties and rights in the United States of America, in violation of 18 U.S.C. §1343.

Count 102 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

103	September 7, 2010	<u>U. S. CODE TITLE 18</u>	Thomas Ralph Lehman LKLS+G, LLP The Continued Criminal Enterprise
104		§ 371 Conspiracy to Defraud the USA &	
105		§ 241 Conspiracy Against Rights &	
106		§ 242 Deprivation Rights Under Color of Law &	
107		§ 1346 Scheme/Artifice to Defraud &	
108		§ 1961 <i>et seq.</i> – RICO &	
109		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On September 7, 2010, Charles Tavares (“Tavares”) [fires](#) Tavares’ personal, and Tavares’ Companies Miami River Park Marina, Inc., a Florida corp. (MRPM”), Brickell Village One, LLC, a Florida L.L.C. (BV One”), and 2147 SW 8 Street, LLC, a Florida L.L.C.’s co-counsel in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al.*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), [Peter W. Homer](#) (“Homer”) and [Luis E. Delgado](#) (“Delgado”) at [Homer & Bonner, P.A.’s](#) (“Homer & Bonner”) after a systematic campaign by Tavares’ longtime attorney [Thomas Ralph Lehman](#) at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”) coercing Tavares to fire Homer & Bonner because, among other things, Homer & Bonner are overcharging Tavares for [legal fees](#), e.g., by “[overbilling Tavares for taking two \(02\) leading attorneys to Tavares’ Deposition](#)”. Because Tavares does not know – or suspect, that Lehman is an Associate of BRIDGELoAN’s Transnational Continued Criminal Enterprise⁹¹ (“CCE” or “Criminal Enterprise”), as Lehman is representing Tavares since 2005, referred by Tavares’ longtime attorney, and also unknown to Tavares at the time, another Associate of the CCE, [Marco Emilio Rojas](#) (“Rojas”), Tavares believes Lehman’s conning statements against Homer & Bonner, following Lehman’s sham advice. The CCE’s schemes extorting the unsuspecting client/borrower /victim Tavares is predicated on, at all relevant times, surreptitiously surrounding, for years, [Tavares with Associates of the CCE to gain trust](#), and gather intelligence, to successfully deprive and extort. Because Tavares trusted his attorney Lehman’s advice, Tavares followed it. With Homer & Bonner gone, the Criminal Enterprise now has the unsuspecting Tavares represented by criminals, among others, Lehman, LKLS+G, and Rojas, while Tavares’ Investor and Third-Party Defendant in BRIDGELoAN Case is also represented by a CCE’s Associate, and also a Tavares’ former attorney, [Alan Samuel Fine](#) (“Fine”) at Alan S. Fine, P.A., which the record shows, will embolden the CCE to systematically perpetrate the biggest scheme ever in a court of law in the USA, to deprive and extort, under color of law, Tavares of all properties and rights.

⁹¹ See, among others, Associates [Joseph Horn](#) (Horn”), [Ralph Horn](#) (“Ralph”), [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”), and [Daniel Ades](#) (“Ades”). See [Tavares’ Affidavit of 11/27/2022](#).

COUNTS

Count 103 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 104 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 105 - Thomas Ralph Lehman ("Lehman"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 106 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 107 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 108 - Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 109 – Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, trust account frauds, false an conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions to further extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
110	September 14, 2010 and Continuing	U. S. CODE TITLE 18	Alan Samuel Fine
111		§ 371 Conspiracy to Defraud the USA	Alan S. Fine, P.A.
112		&	Thomas Ralph Lehman
113		§ 241 Conspiracy Against Rights	Patrick J. Rengstl
114		&	Maria Alexis Carattini
115		§ 242 Deprivation Rights Under Color of Law	LKLS+G, LLP
116		&	Marco Emilio Rojas
117		§ 1346 Scheme/Artifice to Defraud	R & S, LLP
		&	Romulo Pina Dantas
		§ 1343 Wire Fraud	Joseph Horn
		&	Ralph Horn
	§ 1961 <i>et seq.</i> – RICO	Ricardo Eichenwald	
	&	Fernando Braghin	
	FLORIDA STATUTES	Daniel Ades	
	Title XLVI § 817.155 Fraudulent Practices	Bridgeloan Investors, Inc.	
	&	The Continued Criminal Enterprise	
	Florida Bar Rules of Professional Conduct		
	Misconduct – Rule 4-8.4 (a)(b)(c)(d)		

On September 14, 2010 at 3:52 p.m., and at all relevant times, to further a scheme extorting client/victim Charles Tavares (“Tavares”) of properties and rights in a sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., and v. Third-Party Defendant Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, by officers of the court, [Maria Alexis Carattini](#) (“Carattini”) and Thomas R. Lehman (“Lehman”), at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), Tavares’ personal and corporate attorneys in the BRIDGELOAN Case, [E-mail](#) sharing litigation documents and strategies with opposing Third-Party Defendant Romulo Pina Dantas’ (“Dantas”) attorney Alan S. Fine (“Fine”) at Alan S. Fine, P.A. Because Fine is an [Associate of BRIDGELOAN’s Transnational Continued Criminal Enterprise](#)⁹² (“CCE” or “Criminal Enterprise”), and is not providing proper legal work to Dantas, only covertly perpetrating artifices to coerce, intimidate, defraud, and extort Tavares, *et al.*, undetected in the shadows,⁹³ Fine does not make an appearance in the BRIDGELOAN Case, although [is representing Dantas](#), the Third-Party Defendant Tavares is suing in the BRIDGELOAN Case. At all relevant times, Tavares’ personal and corporate attorneys, among others, Lehman, Rengstl, Rojas, *et al.*, together with Associates Fine and BRIDGELOAN are conspiring to deprive, steal, and extort Tavares of properties and rights upon subverted court proceedings.

⁹² See, among others, Associates [Joseph Horn](#) (“Horn”), [Ralph Horn](#) (“Ralph”), [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”), [Daniel Ades](#) (“Ades”), [Marco Emilio Rojas](#) (“Rojas”), [Robert Michael Haber](#) (“Haber”), [Thomas Ralph Lehman](#) (“Lehman”), LKLS+G, Elias Antonio Barreto (“Elias Barreto”), and Gabriela Maranhao Machado Guimaraes. See [Tavares’ Affidavit of 11/27/2022](#).

⁹³ The record obtained in the legal malpractice Related Case by Tavares against Leman & LKLS+G, Case No. 2013-12223-CA-40, shows criminal Fine, an Associate of BRIDGELOAN’s CCE, is not only a Tavares’ former attorney, but also an attorney of BRIDGELOAN, and because of that, shamelessly, as part of the scheme, falsely represents Dantas in fatal conflict of interest as [a former attorney of BRIDGELOAN](#), Tavares, and Dantas, in the same styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. BRIDGELOAN, et al. v. Third-Party Defendant Dantas* to further the scheme.

COUNTS

Count 110 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 111 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 112 - Alan Samuel Fine ("Fine"), Alan S. Fine, P.A., Patrick J. Rengstl ("Rengstl"), Thomas Ralph Lehman ("Lehman"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Nelson Slosbergas ("Slosbergas"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 113 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 114 – Maria Alexis Carattini ("Carattini"), Thomas Ralph Lehman ("Lehman"), Patrick J. Rengstl ("Rengstl"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Alan Samuel Fine ("Fine"), Alan S. Fine, P.A., and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, electronic communications, to wit – among others, a certain E-mail of: **(114a)** Tuesday, September 14, 2014 at 3:17 p.m., from Carattini to Fine, c.c. Lehman; and, **(114b)** Tuesday, September 14, 2014 at 3:52 p.m., from Carattini to Fine, c.c. Lehman, in violation of, 18, U.S.C. § 1343.

Count 115 - At all times relevant, Alan Samuel Fine ("Fine"), Alan S. Fine, P.A., Patrick J. Rengstl ("Rengstl"), Thomas Ralph Lehman ("Lehman"), Maria Alexis Carattini ("Carattini"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Marco Emilio Rojas ("Rojas"), R&S, LLP, Romulo Pina Dantas ("Dantas"), Joseph Horn ("Horn"), Ralph Horn ("Ralph"), Ricardo Eichenwald ("Eichenwald"), Fernando Braghin ("Braghin"), Daniel Ades ("Ades"), Nelson Slosbergas ("Slosbergas"), 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, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 116 - Alan Samuel Fine (“Fine”), Alan S. Fine, P.A., Patrick J. Rengstl (“Rengstl”), Thomas Ralph Lehman (“Lehman”), Robin Barrera (“Barrera”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Marco Emilio Rojas (“Rojas”), R&S, LLP, Romulo Pina Dantas (“Dantas”), Joseph Horn (“Horn”), Ralph Horn (“Ralph”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Daniel Ades (“Ades”), Nelson Slosbergas (“Slosbergas”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 117 – Alan Samuel Fine (“Fine”), Alan S. Fine, P.A., Patrick J. Rengstl (“Rengstl”), Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Marco Emilio Rojas (“Rojas”), Nelson Slosbergas (“Slosbergas”), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, trust account frauds, false and conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions to further extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
118	September 21, 2010 and Continuing	U. S. CODE TITLE 18	Alan Samuel Fine
		§ 371 Conspiracy to Defraud the USA	Alan S. Fine, P.A.
		&	Thomas Ralph Lehman
119		§ 241 Conspiracy Against Rights	Patrick J. Rengstl
		&	Robin Barrera
120		§ 242 Deprivation Rights Under Color of Law	LKLS+G, LLP
		&	Marco Emilio Rojas
121		§ 1346 Scheme/Artifice to Defraud	R & S, LLP
		&	Romulo Pina Dantas
122		§ 1961 <i>et seq.</i> – RICO	Joseph Horn
		&	Ralph Horn
		FLORIDA STATUTES	Ricardo Eichenwald
123		Title XLVI § 817.155 Fraudulent Practices	Fernando Braghin
		&	Daniel Ades
		Florida Bar Rules of Professional Conduct	Bridgeloan Investors, Inc.
124		Misconduct – Rule 4-8.4 (a)(b)(c)(d)	The Continued Criminal Enterprise

On September 21, 2010 at 1:39 p.m., furthering an ongoing scheme by a Transnational Continued Criminal Enterprise⁹⁴ (“CCE” or “Criminal Enterprise”) extorting Charles Tavares (“Tavares”) of properties and rights upon sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al.*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, by officers of the court, the CCE’s Associate Alan S. Fine⁹⁵ (“Fine”), at Alan S. Fine, P.A., [emails](#) (“**Fine E-mails**”) client/victim’s personal and corporate attorney in the BRIDGELoAN Case, [Patrick J. Rengstl](#) (“**Rengstl**”) at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”) attempting to take over the listing of Tavares’ 9 Acres Miami River Marina Property – the single largest Riverfront property and the Brickell Village One buildings in a 2.4 Acres property, in Miami, FL (collectively “Tavares’ Properties”), to prevent⁹⁶ Tavares from selling the properties to payoff BRIDGELoAN, to further the extortion of Tavares. Associate Fine, among other things, as an artifice to coerce and extort Tavares, states to Rengstl: *“I have a professional firm prepared to jump if Charles [Tavares] agrees, but only if he agrees. We would split the net result with him in a fair way. Please discuss with him and let me know. Sincerely, Alan S. Fine, Esquire – Alan S. Fine, P.A.”*

⁹⁴ See, among others, Associates [Joseph Horn](#) (“Horn”), [Ralph Horn](#) (“Ralph”), [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”) Jeffrey B. Flick (“Flick”), [Daniel Ades](#) (“Ades”), [Marco Emilio Rojas](#) (“Rojas”), [Robert Michael Haber](#) (“Haber”), [Thomas Ralph Lehman](#) (“Lehman”), LKLS+G, Elias Antonio Barreto (“Elias Barreto”), and Gabriela Maranhao Machado Guimaraes. See [Tavares’ Affidavit of 11/27/2022](#).

⁹⁵ The CCE’s Associate Fine is a longtime former partner of Freeman, Slosbergas, Haber, Rojas, and Stanham, and is an attorney of BRIDGELoAN, and a Tavares’ former attorney, to further the extortion, covertly representing Tavares’ investor and Third-Party Defendant Romulo Pina Dantas (“Dantas”), in the same BRIDGELoAN Case to extort Tavares under color of law.

⁹⁶ Fine, *et al.*’s deploy the artifice to take over the listing to extort Tavares after the CCE improperly [receives confidential & attorney-client privileged information from Tavares’ attorneys](#) relating to Tavares ongoing negotiations to sell one of Tavares’ properties, to among others, Walmart, and other major companies, as it now known that Tavares’ attorneys Lehman and Rojas are Associates of the CCE, covertly working to undermine and prevent Tavares from selling any one of the two of Tavares’ properties valued over \$50 million, to pay off BRIDGELoAN’s Sham \$12 million Loan with associate Mellon United National Bank, N.A. n.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), as Tavares was able to do in 2002, saving Tavares from the previous extortion by BRIDGELoAN’s CCE in the *Brickell Premier Project* with same *Modus Operandi*, see this Brief.

COUNTS

Count 118 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 119 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 120 - Alan Samuel Fine ("Fine"), Alan S. Fine, P.A., Patrick J. Rengstl ("Rengstl"), Thomas Ralph Lehman ("Lehman"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Marco Emilio Rojas, R&S Law, Nelson Slosbergas ("Slosbergas"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 121 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 122 - At all times relevant, Alan Samuel Fine ("Fine"), Alan S. Fine, P.A., Patrick J. Rengstl ("Rengstl"), Thomas Ralph Lehman ("Lehman"), Robin Barrera ("Barrera"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Marco Emilio Rojas ("Rojas"), R&S, LLP, Romulo Pina Dantas ("Dantas"), Joseph Horn ("Horn"), Ralph Horn ("Ralph"), Ricardo Eichenwald ("Eichenwald"), Fernando Braghin ("Braghin"), Daniel Ades ("Ades"), Nelson Slosbergas ("Slosbergas"), 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, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record, and [Tavares Sworn Affidavit](#).

Count 123 - Alan Samuel Fine (“Fine”), Alan S. Fine, P.A., Patrick J. Rengstl (“Rengstl”), Thomas Ralph Lehman (“Lehman”), Robin Barrera (“Barrera”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Marco Emilio Rojas (“Rojas”), R&S, LLP, Romulo Pina Dantas (“Dantas”), Joseph Horn (“Horn”), Ralph Horn (“Ralph”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Daniel Ades (“Ades”), Nelson Slosbergas (“Slosbergas”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 124 – Alan Samuel Fine (“Fine”), Alan S. Fine, P.A., Patrick J. Rengstl (“Rengstl”), Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Marco Emilio Rojas (“Rojas”), Nelson Slosbergas (“Slosbergas”), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, trust account frauds, false an conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions to further extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

125	September 30, 2010	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Joseph Horn Ralph Horn Ricardo Eichenwald
126		§ 241 Conspiracy Against Rights &	Fernando Braghin Daniel Ades
127		§ 1346 Scheme/Artifice to Defraud &	Renata Carvalho Bertrand Nelson Slosbergas
128		§ 1344 Bank Fraud &	Matthew Paul Leto Hall Lamb and Hall, P.A.
129		§ 1961 <i>et seq.</i> – RICO &	Bridgeloan Investors, Inc. Dennis Joyce
130		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices &	Robert Parkinson The Bank of New York Mellon Erica L. English
131	<u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Harold Eugene Lindsey III Katz Barron Squitero Faust, P.A. The Continued Criminal Enterprise	

On September 30, 2010, Joseph Horn (“Horn”), a manager of sham lender Bridgeloan Investors, Inc., a Florida corp. (“BRIDGELoAN”), signs⁹⁷ a **sham Settlement Stipulation as to Intervenor MUNB Loan Holdings, LLC, a Delaware company** (“MUNB” or “BNY Mellon New York”) (“Sham Settlement BNY Mellon & BRIDGELoAN”). The sham Settlement BNY Mellon & BRIDGELoAN is an artifice⁹⁸ to further the brazen ongoing scheme extorting borrower Charles Tavares (“Tavares”) of two collateral properties valued over \$50 million dollars in lieu of a Sham \$12 million dollars Loan by BRIDGELoAN, an entity used by a Transnational Continued Criminal Enterprise⁹⁹ (“CCE” or “Criminal Enterprise”), together with associate and co-lender BNY Mellon, in corrupted proceedings in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., and v. Third-Party Defendant Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#), vitiated by fraud by officers of the court. The record shows false and contradictory claims by BRIDGELoAN and attorneys Matthew P. Leto (“Leto”), Andrew C. Hall (“Andy Hall”), and Hall, Lamb and Hall, P.A., as part of the scheme to extort, under color of law, Tavares of properties and rights.

⁹⁷ Horn’s signature is notarized by BRIDGELoAN’s employee Renata Carvalho Bertrand (“Bertrand”), and BNY Mellon’s Dennis Joyce signature is notarized by BNY Mellon’s attorney Erica L. English (“English”) at Katz Barron Squitero Faust (“Katz Barron”).

⁹⁸ The CCE’s artifice consists of, *inter alia*, corruptly using its longtime close associate BNY Mellon, that has repeatedly enabled BRIDGELoAN’s – and its affiliated entities, *e.g.*, Flick Mortgage, to further BRIDGELoAN’s money laundering, portfolio tax-free bond frauds, tax frauds, and extortions, to become a party in the BRIDGELoAN Case in order to further totally corrupt and subvert the judicial machinery to successfully deprive and extort Tavares of properties and rights in the sham proceedings. The record shows that Horn and Horn’s family in Brazil have major banking relationships with BNY Mellon, and at all relevant times, BNY Mellon knew, and/or had to know that, *inter alia*, BRIDGELoAN is committing frauds upon the court, and is part of the CCE. BNY Mellon’s former president in Brazil, years later is implicated in corruption scandals and arrested by Brazilian police.

⁹⁹ Among others, Associates Joseph Horn (Horn”), Ralph Horn (“Ralph”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Nelson Slosbergas (“Slosbergas”), Stephen A. Freeman (“Freeman”), Daniel Ades (“Ades”), Marco Emilio Rojas (“Rojas”), Robert Michael Haber (“Haber”), Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Elias A. Barreto (“Elias Barreto”), Gabriela Machado Guimaraes (“Guimaraes”, D.O.B. 08/17/1965, in Brazil) Jeffrey B. Flick (“Flick”), Flick Mortgage Investors, Inc., a Florida corp. (“Flick Mortgage”). See Tavares’ Affidavit of 11/27/2022.

COUNTS

Count 125 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 126 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 127 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 128 - Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, Dennis Joyce, Robert Parkinson, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. ("BNY Mellon") (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares ("Tavares") of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon's Shareholders, in violation of, 18 U.S.C. §1344.

Count 129 - The 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, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

Count 130 - At all relevant times, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, Dennis Joyce, Robert Parkinson, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon, and other Perpetrators implicated, knew and had to know that, among others, BRIDGELoAN is an entity used by a Transnational Continued Criminal Enterprise (“CCE”), and that the CCE is perpetrating frauds upon the courts in the BRIDGELoAN Case to deprive, steal, and extort U.S. citizen Charles Tavares of properties and rights upon a court of law in the United States of America, and despite of that, knowingly and intentionally, systematically commit fraudulent acts to further the brazen 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 131 – Mathew P. Leto, Andre Clifford Hall, Hall, Hall, Lamb and Hall, P.A., Nelson Slosbergas, Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, P.A., and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, trust account frauds, false an conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions to further extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
132	October 25, 2010	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Ricardo Eichenwald Joseph Horn Ralph Horn
133		§ 241 Conspiracy Against Rights &	Fernando Braghin Daniel Ades
134		§ 1346 Scheme/Artifice to Defraud &	Nelson Slosbergas Bridgeloan Investors, Inc.
135		§ 1343 Wire Fraud &	Romulo Pina Dantas The Continued Criminal Enterprise
136		§ 1961 <i>et seq.</i> – RICO	

On October 25, 2010 at 10:36 a.m., and, at 11:10 a.m., [Ricardo Eichenwald](#) (“Eichenwald”), a principal, and an Associate of sham lender Bridgeloan Investors, Inc., a Florida corp.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), to further a scheme extorting Charles Tavares (“Tavares”) of properties and rights, **transmits E-mails to Tavares’ investor Romulo Pina Dantas** (“Dantas”), relating to a conspiracy to defraud Tavares in the ongoing litigation in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”). The record here shows Eichenwald, a principal of sham lender BRIDGELOAN that willfully entrapped borrower/victim Tavares in a \$12 million Sham Loan, together with its associate and co-lender Mellon United National Bank, N.A. n.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), followed by systematically interfering with Tavares’ Sham Loan, investors, and partners, to knowingly and intentionally cause the Sham Loan into default to further extort Tavares of two (02) separate collateral properties valued over \$50 million securing the Sham Loans, has successfully corrupted Third-Party Defendant into the scheme to deprive and extort Tavares with an artifice using a sham settlement agreement after surrounding Dantas to be represented with the CCE’s Associate [Alan Samuel Fine](#) (“Fine”), a criminal using his Florida Bar license as guise to commit crimes. In the [E-mails](#), Eichenwald at ricardo@h2e.com, from Miami, FL, USA, to Dantas in Brazil at romulo@totalplus.com [¹⁰⁰], states: “*Good morning Boss. I want to talk to you but I can’t locate you in BR [Brazil]. Please, send me your information and give me a call. Regards. Ricardo Eichenwald Horn Eichenwald Investments Corp. 2601 South Bayshore Drive, Suite 1200 Miami FL 33133*”; and, again, Eichenwald at ricardo@h2e.com, from Miami, FL, USA, to Dantas in Brazil at romulo@totalplus.com, states on October 25, 2010 at 11:10 a.m.: “*Only thing you need is pick up the call there. I am available. Ricardo Eichenwald Horn Eichenwald Investments Corp. 2601 South Bayshore Drive, Suite 1200 Miami FL 33133.*” The record uncovered in discovery in the legal malpractice suit by Tavares against Tavares’ personal and corporate attorneys Thomas R. Lehman and Levine Kellogg Lehman Schneider + Grossman, LLP for frauds extorting client Tavares, see Related Case Lehman & LKLS+G, shows Tavares’ partner and Third-Party Defendant Dantas, and Plaintiff’s Eichenwald at BRIDGELOAN, at all times relevant, conspiring to defraud and extort Tavares¹⁰¹ of properties and rights.

¹⁰⁰ Dantas e-mail address at romulo@totalplus.com is for Dantas’ company “*Total Plus*”, one of the largest private Gas Station Chains in Northeast Brazil based in Recife, PE, together with Dantas’ partner Marcos Jose Bezerra Menezes (“Menezes”).

¹⁰¹ Investor and friend Dantas’ betrayal and extortion of Tavares, together with *Eichenwald, Horn, et al.*, - now known criminals disguised as lenders, shocks the conscious because Tavares always worked hard [providing highest returns and security](#) for all.

COUNTS

Count 132 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 133 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 134 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 135 - Ricardo Eichenwald ("Eichenwald"), Bridgeloan Investors, Inc., a Florida corp. ("BRIDGELoAN"), Romulo Pina Dantas ("Dantas"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights upon subverted proceedings upon Miami Courts, electronic communications, to wit – among others, certain [E-mails](#) of; **135(a)** on October 25, 2010 at 10:36 a.m. by Eichenwald at ricardo@h2e.com in Miami, Florida, United States of America, to Dantas at romulo@totalplus.com.br in Brazil; and, **135(b)** on October 25, 2010 at 11:10 a.m. by Eichenwald at ricardo@h2e.com in Miami, Florida, United States of America, to Dantas at romulo@totalplus.com.br in Brazil, to further schemes to deprive and extort U.S. citizen Charles Tavares of properties and rights in the United States of America.

Count 136 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record, and [Tavares Sworn Affidavit](#).

COUNT APROX. DATE VIOLATIONS PERPETRATORS

<u>COUNT</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
137	October 25, 2010	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Nelson Slosbergas Bridgeloan Investors, Inc. The Continued Criminal Enterprise
138		§ 241 Conspiracy Against Rights &	
139		§ 242 Deprivation Rights Under Color of Law &	
140		§ 1346 Scheme/Artifice to Defraud &	
141		§ 1341 Mail Fraud &	
142		§ 1961 <i>et seq.</i> – RICO &	
143		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices &	
144	<u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)		

On October 25, 2010 at 4:13 p.m., furthering an ongoing scheme by a Transnational Continued Criminal Enterprise¹⁰² (“CCE” or “Criminal Enterprise”) extorting Charles Tavares (“Tavares”) of properties and rights upon sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, by among other officers of the court, Matthew Paul Leto (“Leto”), and Andrew Clifford Hall (“Andy Hall”) at Hall, Lamb and Hall, P.A. (“Hall & Lamb”), file, with unclean hands, a sham contradictory [Plaintiff’s Motion for Summary Judgment of Foreclosure](#) – showing the CCE’s ***Omertà Code***¹⁰³. BRIDGELOAN’s sham Motion for Summary Judgment of Foreclosure, willfully falsely states, that : “*On or about July 21, 2007, Bridgeloan Investors, Inc. (“BRIDGELOAN”), authorized a loan to Defendants, Miami River Park Marina, Inc. (“Miami River”), Brickell Village One, LLC (“Brickell”), and 2147 SW 8 Street, LLC (“2147 SW 8 Street”), in the original amount of Seven Million Dollars (\$7,000,000.00)(the “Loan”) for use in connection with a plan to develop a certain real estate in Miami ...”* And; “*On July 2, 2007 and pursuant t to a Future Advance of \$5,000,000.00, the total principal amount of the loan owed by Miami River, Brickell, and 2147 SW 8 Street increased to \$12,000,000.00.”* Leto, Hall, *et al.*, know – and had to know that these, and other statements to the court are patently fraudulent to further the scheme extorting Tavares of properties and rights in subverted proceedings, and their filings is also to show to other Associates and officers of the court their commitment to the scheme, or ***Omertà Code***, further committing mail fraud by U.S. Post mailing the fraudulent pleadings.

¹⁰² Among others, Associates [Joseph Horn](#) (“Horn”), [Ralph Horn](#) (“Ralph”), [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”), [Daniel Ades](#) (“Ades”), [Marco Emilio Rojas](#) (“Rojas”), [Robert M. Haber](#) (“Haber”), [Thomas Ralph Lehman](#) (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Elias A. Barreto (“Elias Barreto”), Gabriela Machado Guimaraes (“Guimaraes”, D.O.B. 08/17/1965, in Brazil) Jeffrey B. Flick (“Flick”), Flick Mortgage Investors, Inc., a Florida corp. (“Flick Mortgage”). See [Tavares’ Affidavit of 11/27/2022](#).

¹⁰³ The CCE’s ***Omertà Code***, requires that Associates agree to commit, and display in the record, at least two (02) acts of racketeering activity in the conduct of the affairs of the CCE, to assure the CCE’s Associates, and observers, their commitment.

COUNTS

Count 137 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, further corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 138 - 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 honest services upon national banking and financial associations, and upon courts of law in the United States, and free from intimidation, harassment, and extortion of properties and rights by licensed attorneys from the constitutionally mandated Florida Bar, in violation of, among other things, 18 U.S.C. §241, §1346, and §1349.

Count 139 - Mathew Paul Leto ("Leto"), Andrew Clifford Hall ("Andy Hall"), Hall, Lamb and Hall, P.A. ("Hall & Lamb"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 140 - 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 Judicial Machinery, 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 141 – Mathew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, a certain U.S. Postal Mail with [fraudulent pleadings: \(141a\)](#) dated, October 25, 2010 to: "*Thomas R. Lehman, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131*"; and, **(141a)** dated, October 25, 2010 to: "*Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134. /s/ Mathew Paul Leto*", in violation of, 18, U.S.C., § 1341.

Count 142 - At all times relevant, the 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, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record, and [Tavares Sworn Affidavit](#).

Count 143 - Matthew Paul Leto (“Leto”), Andrew Clifford Hall (“Andy Hall”), Hall, Lamb and Hall, P.A. (“Hall & Lamb”), Joseph Horn (“Horn”), Ralph Horn (“Ralph”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Daniel Ades (“Ades”), Nelson Slosbergas (“Slosbergas”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 144 – Matthew Paul Leto (“Leto”), Andrew Clifford Hall (“Andy Hall”), Hall, Lamb and Hall, P.A. (“Hall & Lamb”), Nelson Slosbergas (“Slosbergas”), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in the known criminal scheme to deprive, steal, and extort Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, trust account frauds, false and conflicted legal representation against clients by being partners and attorneys in directly adversarial and conflicted positions to further extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
145	October 27, 2010	U. S. CODE TITLE 18	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Bridgeloan Investors, Inc. Jeffrey B. Flick Richard A. Buck Flick Mortgage Investors, Inc. Crescent Resources, LLC The Continued Criminal Enterprise
146		§ 371 Conspiracy to Defraud the USA &	
147		§ 241 Conspiracy Against Rights &	
148		§ 242 Deprivation Rights Under Color of Law &	
149		§ 1346 Scheme/Artifice to Defraud &	
150		§ 1343 Wire Fraud &	
151		§ 1344 Bank Fraud &	
152		§ 1961 <i>et seq.</i> – RICO &	
153		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On October 27, 2010 at 11:20 a.m., [Mathew P. Leto](#) (“Leto”) at Hall, Lamb and Hall, P.A. (“Hall & Lamb”), knowingly and intentionally, to further an ongoing scheme by a Transnational Continued Criminal Enterprise¹⁰⁴ (“CCE” or “Criminal Enterprise”) extorting Charles Tavares (“Tavares”) of properties and rights upon sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, transmits, via [E-mail](#), a certain fraudulent¹⁰⁵ Letter of Intent (“[Flick’s Sham Offer](#)”), purportedly offering to buy Tavares’ Brickell Village One Buildings (“Brickell Buildings”) – one of two of Tavares’ properties valued over \$50 million dollars securing a sham \$12 million dollars loan by sham lender BRIDGELoAN, and co-lender and enabler Mellon United National Bank, N.A. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), from [Richard A. Buck](#) (“Richard Buck”) at [Crescent Resources, LLC](#) (“Crescent”) to Jeffrey B. Flick (“Flick”) at Loan Rescue, LLC a.k.a. Flick Mortgage Investors, Inc., Associates of BRIDGELoAN’s CCE. At all relevant times, the Perpetrators knew that Flick’s Sham Offer is an artifice to devalue Tavares’ properties to further a scheme to extort Tavares.

¹⁰⁴ Among others, Associates [Joseph Horn](#) (Horn”), [Ralph Horn](#) (“Ralph”), [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”), [Daniel Ades](#) (“Ades”), [Marco Emilio Rojas](#) (“Rojas”), [Robert Michael Haber](#) (“Haber”), [Thomas Ralph Lehman](#) (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), [Elias A. Barreto](#) (“Elias Barreto”), [Gabriela Machado Guimaraes](#) (“Guimaraes”, D.O.B. 08/17/1965, in Brazil) [Jeffrey B. Flick](#) (“Flick”), and [Francisco Ruiz](#) (“Ruiz”). See [Tavares’ Affidavit of 11/27/2022](#).

¹⁰⁵ At all relevant times, the Perpetrators know that Flick does not own or represent Tavares’ Brickell Buildings. Further, Flick’s Sham Offer by Richard Buck at Crescent, dated October 20, 2010, and fraudulently E-mailed on October 27, 2010 at 11:20 a.m., to Tavares’ personal and corporate attorney Patrick J. Rengstl (“Rengstl”) at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), states, among other things, “*This proposal will expire if not accepted on or before October 26, 2010 at the close of the business day.*” Horn, later, upon questioning, states that “*Flick was at BRIDGELoAN’s offices and decided to make the offer*”, which clearly shows the reckless conspiracy to systematically devalue Tavares’ properties to extort Tavares upon the courts.

COUNTS

Count 145 - The Perpetrators, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically defraud the United States of America by using dishonesty, fraud, and deceit to impair, obstruct, and defeat the lawful functions of the United States of America's regulated Banking, Securities and Tax Collection, and corrupting and subverting the judicial machinery to further major criminal schemes against the United States, in violation of 18 U.S.C. §371.

Count 146 - 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 147 - Matthew Paul Leto ("Leto") Hall, Lamb and Hall, P.A. ("Hall & Lamb"), and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 148 - Matthew Paul Leto, Andrew C. Hall, Hall, Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Jeffrey B. Flick, Bridgeloan Investors, Inc., Richard A. Buck, Crescent Resources, LLC, 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 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 149 – Matthew Leto ("Leto"), at Hall, Lamb and Hall, P.A. ("Hall & Lamb"), and other Perpetrators implicated, did knowingly and intentionally, use as an artifice to further a criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, upon subverted proceedings upon Miami Courts, a certain E-mail; **(149a)** dated, October 27, 2010 at 11:20 a.m., with Flick's Sham Offer, to further the scheme upon the courts extorting Charles Tavares of properties and rights, from Leto at Hall & Lamb (MLeto@hlhlawfirm.com), to wit – among others, to: "*Patrick J. Rengstl, Esq. (pjr@lkllaw.com), at Levine, Kellogg, Lehman, Schneider & Grossman, LLP*, in violation of, 18, U.S.C., § 1343.

Count 150 – Matthew Paul Leto, Andrew C. Hall, Hall, Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Jeffrey B. Flick, Bridgeloan Investors, Inc., Richard A. Buck, Crescent Resources, LLC, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. ("BNY Mellon") (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares ("Tavares") of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares's Companies Miami River Park Marina, Inc.,

Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon's Shareholders, in violation of, 18 U.S.C. §1344.

Count 151 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 152 - Matthew Paul Leto, Andrew C. Hall, Hall, Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Jeffrey B. Flick, Bridgeloan Investors, Inc., Richard A. Buck, Crescent Resources, LLC, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 153 – Matthew Paul Leto, Hall, Lamb and Hall, P.A., and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

154	November 3, 2010	U. S. CODE TITLE 18	Erica L. English H. Eugene Lindsey III Katz Barron Squitero Faust Robert M. Parkinson David Fry The Bank of New York Mellon The Continued Criminal Enterprise
155		§ 371 Conspiracy to Defraud the USA &	
156		§ 241 Conspiracy Against Rights &	
157		§ 242 Deprivation Rights Under Color of Law &	
158		§ 1346 Scheme/Artifice to Defraud &	
159		§ 1341 Mail Fraud &	
160		§ 1344 Bank Fraud &	
161		§ 1961 <i>et seq.</i> – RICO &	
162		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On November 3, 2010, at 11:31 a.m., [Erica L. English](#) (“English”) and [Harold Eugene Lindsey III](#) (“Lindsey III”), at [Katz Barron Squitero Faust](#) (“Katz Barron”), attorneys for Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), to further a scheme by a Transnational Continued Criminal Enterprise¹⁰⁶ (“CCE” or “Criminal Enterprise”) extorting Charles Tavares (“Tavares”) of properties and rights upon sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, file a sham [BNY Mellon Motion to Intervene](#).¹⁰⁷ On **BNY Mellon’s sham Motion to Intervene**, Katz Barron fraudulently states, among other things, that: “*On or about July 2, 2007, Mellon United National Bank (“Mellon”) made a loan to Bridgeloan in the original principal sum of \$5,500,000.00, the purpose of which was to enable Bridgeloan to make a mortgage loan to Defendants, Miami River Park Marina, Inc., Brickell Village One, LLC, and 2147 S.W. 8 Street, LLC (collectively, the “Borrower Defendants”).*” Katz Barron fraudulent statements contradict the truth and supporting documents, *inter alia*, a [Collateral Assignment and Security Agreement of July 21, 2005](#) showing original loan of \$2,500,000.00. At all relevant times, BNY Mellon and Katz Barron know that, among other things, BNY Mellon is knowingly and intentionally, enabling and facilitating for years, sham lender BRIDGELOAN and the CCE’s Associates to, *e.g.*, money launder ill-gotten proceeds, tax defraud the United States, systematically perpetrating

¹⁰⁶ See, among others, Associates [Joseph Horn](#) (Horn”), [Ralph Horn](#) (“Ralph”), [Ricardo Eichenwald](#) (“Eichenwald”), [Fernando Braghin](#) (“Braghin”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”), [Daniel Ades](#) (“Ades”), [Marco Emilio Rojas](#) (“Rojas”), [Robert Michael Haber](#) (“Haber”), [Thomas Ralph Lehman](#) (“Lehman”), LKLS+G, Elias Antonio Barreto (“Elias Barreto”), and Gabriela Maranhao Machado Guimaraes. See [Tavares’ Affidavit of 11/27/2022](#).

¹⁰⁷ Katz Barron, showing the CCE’s **Omertà Code**, file, to further the ongoing scheme, the sham pleadings omitting material and relevant facts, and statements contradicting the truth and evidence in support of BNY Mellon’s sham Motion to Intervene.

bank and securities frauds, to further underlying schemes and extortion of U.S. citizens and companies through sham loans, mortgages, securities, and others bogus financial instruments in many jurisdictions the CCE operates, among others, in the United States, Brazil, Cayman Islands, the Bahamas and Europe.

COUNTS

Count 154 - 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 18 U.S.C. §371.

Count 155 - 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 156 - Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, BNY Mellon, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 157 - BNY Mellon, Erica L. English, Katz Barron Squitero Faust, 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 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 18 U.S.C. §1346.

Count 158 – Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, BNY Mellon, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, certain U.S. Postal Mail with pleadings to further the scheme upon the courts extorting Charles Tavares of properties and rights, the sham [BNY Motion to Intervene](#), to further the scheme: **(158a)** dated, November 1, 2010, to: “*Matthew P. Leto, Esq., Hall, Lamb and Hall, P.A., Offices at Grand Bay Plaza, 2665 South Bayshore Drive, Penthouse 1, Miami, FL 33131*; **(158b)** dated, November 1, 2010, to: “*Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon Boulevard, Coral Gables, FL 33134*”. **(158c)** dated, November 1, 2010, to: “*Thomas R. Lehman, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131.*” *Certificate of Service – We Hereby Certify that a true and correct copy of the foregoing [BNY Mellon Motion to Intervene] was furnished via U.S. Mail to all parties on the attached service list on this 1st day of November 2010. KATZ BARRON SQUITERO FAUST. By: /s/ Erica L. English – Erica L. English, Florida Bar No. 0599328 – H. Eugene Lindsey III, Florida Bar No. 0130338”, in violation of, 18, U.S.C., § 1341.*

Count 159 - BNY Mellon, Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. (“BNY Mellon”) (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares (“Tavares”) of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares’s Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon’s Shareholders, in violation of, 18 U.S.C. §1344.

Count 160 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 161 - BNY Mellon, Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 162 – Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

163	November 4, 2010	<u>U. S. CODE TITLE 18</u>	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Nelson Slosbergas Bridgeloan Investors, Inc. Erica L. English H. Eugene Lindsey III Katz Barron Squitero Faust The Bank of New York Mellon The Continued Criminal Enterprise
164		§ 371 Conspiracy to Defraud the USA &	
165		§ 241 Conspiracy Against Rights &	
166		§ 242 Deprivation Rights Under Color of Law &	
167		§ 1346 Scheme/Artifice to Defraud &	
168		§ 1341 Mail Fraud &	
169		§ 1344 Bank Fraud &	
170		§ 1961 <i>et seq.</i> – RICO &	
171		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On November 4, 2010, at 9:02 a.m., Matthew P. Leto (“Leto”), and Andrew C. Hall at Hall, Lamb and Hall, P.A. (“Hall & Lamb”), attorneys for Plaintiff Bridgeloan Investors, Inc., a Florida corp. (“BRIDGELOAN”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, file, with unclean hands, a **sham Motion of Plaintiff Bridgeloan Investors, Inc. to Approve and Adopt Settlement Stipulation as to Intervenor MUNB Loan Holdings, LLC** (“Motion Approve BNY Mellon Intervenor”). Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Mellon to money launder and tax defraud the ill-gotten proceeds. On BNY Mellon’s sham Motion to Intervene, Katz Barron fraudulently states, that: “*On or about July 2, 2007, Mellon United National Bank (“Mellon”) made a loan to Bridgeloan in the original principal sum of \$5,500,000.00, the purpose of which was to enable Bridgeloan to make a mortgage loan to Defendants, Miami River Park Marina, Inc., Brickell Village One, LLC, and 2147 S.W. 8 Street, LLC (collectively, ‘Borrower Defendants’).*” Katz Barron fraudulent statements contradict the truth and supporting documents, *inter alia*, a certain [Collateral Assignment and Security Agreement of July 21, 2005](#) showing original loan of \$2,500,000.00. At all relevant times, Leto, Hall & Lamb, BRIDGELOAN, BNY Mellon and Katz Barron, know that, among other things, BNY Mellon is knowingly and intentionally, enabling and facilitating for years, sham lender BRIDGELOAN and the CCE’s Associates to, *e.g.*, money launder ill-gotten proceeds, tax defraud the USA,

systematically perpetrating bank, mortgage, portfolio tax-free bond and securities frauds, to further underlying schemes, and extortion of U.S. citizens and companies through sham loans, mortgages, securities, and others bogus financial instruments in many jurisdictions the CCE operates, among others, in the United States of America, Brazil, Cayman Islands, the Bahamas and Europe.

COUNTS

Count 163 - 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 18 U.S.C. §371.

Count 164 - 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 165 - Matthew P. Leto, Andrew C. Hall, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 166 - Matthew P. Leto, Andrew C. Hall, Bridgeloan Investors, Inc., BNY Mellon, 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 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 18 U.S.C. §1346.

Count 167 – Matthew P. Leto, Andrew C. Hall, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, certain U.S. Postal Mail with sham pleadings to further the scheme upon the courts extorting Charles Tavares of properties and rights, the sham [Approve and Adopt Settlement Stipulation as to Intervenor MUNB Loan Holdings, LLC](#), to further the scheme, dated, November 4, 2010, **(167a)** to: “Thomas R. Lehman, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131”; **(167b)** to: “Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon Boulevard, Coral Gables, FL 33134”; and, **(167c)** to: “Erica L. English, Esq., Katz Barron Squitero Faust, 2699 South Bayshore Drive, 7th Floor, Miami, FL 33133 - *Certificate of Service – We Hereby Certify that a true and correct copy of the foregoing was served via facsimile and via U.S. Mail to all parties on the attached service list on this 4th day of November, 2010. By: /s/ Mathew P. Leto, in violation of, 18, U.S.C., § 1341.*

Count 168 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Bridgeloan Investors, Inc., BNY Mellon, Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. (“BNY Mellon”) (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares (“Tavares”) of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares’s Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon’s Shareholders, in violation of, 18 U.S.C. §1344.

Count 169 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

Count 170 - Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Bridgeloan Investors, Inc., BNY Mellon, Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 171 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, Nelson Slosbergas, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

172	November 24, 2010	U. S. CODE TITLE 18	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Nelson Slosbergas Renata Carvalho Bertrand Bridgeloan Investors, Inc. The Continued Criminal Enterprise
173		§ 371 Conspiracy to Defraud the USA &	
174		§ 241 Conspiracy Against Rights &	
175		§ 242 Deprivation Rights Under Color of Law &	
176		§ 1346 Scheme/Artifice to Defraud &	
177		§ 1341 Mail Fraud &	
178		§ 1344 Bank Fraud &	
179		§ 1961 <i>et seq.</i> – RICO &	
180		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On November 24, 2010, at 3:27 p.m., Matthew P. Leto (“Leto”), and Andrew C. Hall, at Hall, Lamb and Hall, P.A. (“Hall & Lamb”), attorneys for Plaintiff Bridgeloan Investors, Inc., (“BRIDGELOAN”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, [file](#), with unclean hands, a patently **fraudulent Affidavit of Joseph Horn** (“Horn”), on behalf of BRIDGELOAN. Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Mellon to money launder and tax defraud the ill-gotten proceeds. Among other patently fraudulent and contradictory statements to the Miami Courts, showing the CCE’s **Omertà Code**,¹⁰⁸ Horn, knowingly and intentionally, falsely states: “On or about July 21, 2007, Bridgeloan Investors, Inc. (‘BRIDGELOAN’), authorized a loan to Defendants, Miami River Park Marina, Inc. (‘Miami River’) Brickell Village One, LLC (‘Brickell’), and 2147 SW 8 Street, LLC (‘2147 SW 8 Street’), in the original principal amount of Seven Million Dollars (\$7,000,000.00) (the “Loan”) for use in connection with a plan to develop certain real estate in Miami...” And, “On July 2, 2007 and pursuant to a Future Advance of \$5,000,000.00, the total principal amount of the loan owed by Miami River, Brickell, and 2147 SW 8 Street increased to

¹⁰⁸ The CCE’s **Omertà Code** requires that Leto, Hall Lamb, Horn, and BRIDGELOAN, willfully show their commitment to the scheme extorting Tavares of properties and rights by, *inter alia*, filing the facially patently fraudulent Affidavit of Joseph Horn.

\$12,000,000.00.” These statements are patently facially false and contradictory showing **Omertà Code**. Horn, further, to brazenly display **Omertà Code** to other Associates of the CCE, and observers, knowingly and intentionally, fraudulently inflates¹⁰⁹ the default interest charged to borrower/victim Tavares to \$3,744,666.67, fraudulently charging Tavares for, among other things, “*unpaid interest*” from February 2009 through September 2009, when in truth and in fact, Tavares paid the \$120,000 monthly interest from February to September 2009,¹¹⁰ and Horn knows Tavares paid and Horn received these payments. Horn’s Affidavit, brazenly displaying to other Associates, and observers, that Horn is totally committed to the brazen criminal scheme, shows Horn’s fraudulent Affidavit notarized by BRIDGELoAN’s employee and Notary Public Renata Carvalho Bertrand (“Renata Bertrand”) with a false date of “November 23, 2009”, to demonstrate that they all know Horn’s Affidavit is facially and factually fraudulent and it is part of the CCE’s **Omertà Code**, providing an “*insurance policy*” to Associates that, Horn, the *Boss* of BRIDGELoAN’s CCE, is fully committed to the criminal scheme. At all relevant times, all the Perpetrators implicated know that Horn’s Affidavit is facially and patently fraudulent, and it is used as an artifice to defraud and extort borrower/victim Tavares of properties and rights upon sham proceedings vitiated by frauds, and to further defraud the United States of America of honest services upon courts of law in the United States of America and taxable income.

¹⁰⁹ In addition to displaying **Omertà Code** to the CCE’s Associates, and observers, showing that Horn, and other implicated Associates are fully committed to the brazen criminal scheme systematically extorting Tavares upon subverted proceedings in a court of law in the United States of America, Horn’s fraudulent inflated claims of \$15,772,178.67, including \$3,744,666.67 in fraudulent claims of default interest from Tavares’ loans, shows how the CCE feeds BRIDGELoAN, and affiliated entities and Associates, among others, Horn Eichenwald Investments, Inc., a Florida corp., h2acapital Corp., a Florida Corp. f.k.a. Bridgeload Partners, Corp. a Florida corp. (Tax Id. #86-3280908), Dartley Securities Limited (Bahamas) and Dartley Bank & Trust Limited (Bahamas), BRIDGEINVEST, LLC, BRIDGEINVEST Fund GP, LLC, a Delaware corp., BRIDGEINVEST Fund GP II, LLC, a Delaware corp., BRIDGEINVEST Fund GP III, LLC, a Delaware corp., and counterparts, among others, BANIF Securities, Inc., Cayman Islands (“BANIF”), and other BANIF affiliated entities hijacked by the CCE (“collectively, “BANIF”), and Integra Solutions, LLC, a Florida L.L.C. (“INTEGRA”) with millions of dollars in fraudulent claims and deductions of mortgage/loan/portfolio tax-free bonds interest, further defrauding the United States of millions of dollars of taxable income, allowing Associates of the CCE, e.g., Joseph Horn, Alex Horn, Slosbergas, Rojas, et al., to live in The Gables Estates and Key Biscayne, enjoying the security and comfort of the United States, provided by hard-working tax-paying Americans that they systematically steal from to improperly feed their lavishly lifestyle.

¹¹⁰ In October 2009, Tavares stops paying BRIDGELoAN & BNY Mellon’s sham loan because of BRIDGELoAN’s systematic and repeated torts successfully causing the loan into default, by among other things, systematically fabricating sham offers and appraisals to devalue Tavares’ two collateral properties valued over \$50 million dollars, securing the sham \$12 million loan, coercing and extorting Tavares attorneys to sabotage and undermine numerous deals Tavares successfully negotiated to sell one of the two properties, and/or join-venture, systematically coercing and extorting Tavares’ investor Romulo Pina Dantas (“Dantas”) not to fulfill its contractual obligations with Tavares to continue funding the interest payments, and other longtime Tavares’ investors and partners, while BRIDGELoAN fraudulently misleads Tavares to believe that BRIDGELoAN and BNY Mellon’s loan have been extended to May 2010 by agreeing to Tavares continuing to pay, and BRIDGELoAN continuing to receive, the \$120,000 monthly loan extension interest, while BRIDGELoAN, *et al.*, willfully, continuously and systematically perpetrate torts causing the loan default, to further the scheme, filing, on December 24, 2009, a sham lawsuit showing fraudulent and contradictory claims against Tavares, to successfully deprive, steal, and extort Tavares of properties and rights, under color of law, in sham proceedings subverted by BRIDGELoAN’s CCE in the sham BRIDGELoAN Case.

COUNTS

Count 172 - 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 18 U.S.C. §371.

Count 173 - 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 174 - Matthew P. Leto, Andrew C. Hall, Hall, Lamb and Hall, P.A., Joseph Horn, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 175 - Matthew P. Leto, Andrew C. Hall, Hall, Lamb and Hall, P.A., Joseph Horn, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., BNY Mellon, 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 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 18 U.S.C. §1346.

Count 176 – Matthew P. Leto, Andrew C. Hall, Hall, Lamb and Hall, P.A., Joseph Horn, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, certain U.S. Postal Mail with a facially patently fraudulent Sworn Affidavit of Joseph Horn on behalf of Bridgeloan Investors, Inc., to further a scheme upon the courts extorting Charles Tavares of properties and rights, the fraudulent Sworn Affidavit of Josep Hone, to further the scheme: **(176a)** dated, November 23, 2010, to: “*Thomas R. Lehman, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131*”; and, to **(176b)** dated, November 23, 2010, to: “*Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon Boulevard, Coral Gables, FL 33134*”. [Leto at Hall & Lamb willfully omit transmitting the sham filing with the facially and fraudulent Sworn Affidavit of Joseph Horn to Intervenor MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon] - *Certificate of Service – We Hereby Certify that a true and correct copy of the foregoing was served via facsimile and via U.S. Mail to all parties on the attached service list on this 23rd day of November, 2010. By: /s/ Mathew Paul Leto,* in violation of, 18, U.S.C., § 1341.

Count 177 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Joseph Horn, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. (“BNY Mellon”) (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares (“Tavares”) of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares’s Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon’s Shareholders, in violation of, 18 U.S.C. §1344.

Count 178 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 179 - Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Joseph Horn, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 180 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Nelson Slosbergas, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

181	December 2, 2010	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl
182		§ 241 Conspiracy Against Rights &	LKLS+G, LLP Marco Emilio Rojas
183		§ 242 Deprivation Rights Under Color of Law &	Alan Samuel Fine Romulo Pina Dantas
184		§ 1346 Scheme/Artifice to Defraud &	Joseph Horn Ralph Horn
185		§ 1961 <i>et seq.</i> – RICO &	Ricardo Eichenwald Fernando Braghin
186		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices &	Daniel Ades Nelson Slosbergas Bridgeloan Investors, Inc.
187		<u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	The Continued Criminal Enterprise

On December 2, 2010, at 10:51 a.m., Charles Tavares’ (“Tavares”) personal and corporate attorneys, [Thomas R. Lehman](#) (“Lehman”), [Patrick J. Rengstl](#) (“Rengstl”), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), covertly furthering a scheme extorting client/victim Tavares of properties and rights in sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further the scheme, produces an unsigned **sham Settlement Agreement between Plaintiff BRIDGELOAN, Defendant Tavares, and Tavares’ investor and Third-Party Defendant Romulo Pina Dantas** (“Dantas”) (“Sham Unsigned Settlement of 12/2010”). The artifice by criminals Lehman, [Marco Rojas](#) (“Rojas”), and [Alan S. Fine](#) (“Fine”), covertly representing [Dantas](#), and Associates of BRIDGELOAN’s Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and sham lender BRIDGELOAN,¹¹¹ is to coerce and trick Tavares to agree to the sham settlement, providing, *inter alia*, that; Tavares would give up sole control and authority of Tavares’ Companies Defendants, Miami River Park Marina, Inc. (“MRPM”), Brickell Village One, LLC (“BV One”), and 2147 SW 8 Street, LLC (“2147”), holding title to Tavares’ properties valued over \$50 million dollars, to two new Special Purpose Entities (“SPEs”), dividing interests among Tavares, Dantas and BRIDGELOAN. As part of the scheme, the sham agreement shows Lehman’s sham appraisals fraudulently appraising Tavares’ Properties to a combined \$22,800,000, to allow the CCE to covertly sell/buy the properties for a sham price. Tavares’ attorneys LKLS+G, at all relevant times, are covertly working to extort Tavares of properties and rights.

¹¹¹ Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by the CCE, together with co-lender Mellon United National Bank n.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”) an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is part of an underlying scheme to extort Tavares’ two collateral properties, [MRPM](#) & [BV One](#), valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Mellon to money launder and tax defraud the ill-gotten proceeds. The record obtained in 2013, from discovery on Tavares’ Related Case against Lehman & LKLS+G, shows, at all relevant times, criminals, *inter alia*, Lehman, LKLS+G, Rojas, Fine, and BRIDGELOAN, continuously perpetrating artifices to deprive and extort Tavares of properties and rights upon the courts, and here, after Lehman and LKLS+G receives attorney/client Tavares’ confidential information about [negotiations by Tavares to sell one of the properties](#), the CCE goes into desperate mode to prevent same as with prior extortion of Tavares in the Brickell Premier project.

COUNTS

Count 181 - 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 18 U.S.C. §371.

Count 182 - 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 183 - Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Nelson Slosbergas, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 184 - Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Nelson Slosbergas, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Romulo Pina Dantas, Marco Emilio Rojas, Alan Samuel Fine, 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 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 18 U.S.C. §1346.

Count 185 – At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Nelson Slosbergas, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Romulo Pina Dantas, Marco Emilio Rojas, Alan Samuel Fine, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.,* Record and [Tavares Sworn Affidavit](#).

Count 186 - Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Nelson Slosbergas, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Romulo Pina Dantas, Marco Emilio Rojas, Alan Samuel Fine, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 187 – Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Nelson Slosbergas, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

188	December 3, 2010	U. S. CODE TITLE 18	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Nelson Slosbergas Renata Carvalho Bertrand Bridgeloan Investors, Inc. The Continued Criminal Enterprise
189		§ 371 Conspiracy to Defraud the USA &	
190		§ 241 Conspiracy Against Rights &	
191		§ 242 Deprivation Rights Under Color of Law &	
192		§ 1346 Scheme/Artifice to Defraud &	
193		§ 1341 Mail Fraud &	
194		§ 1344 Bank Fraud &	
195		§ 1961 <i>et seq.</i> – RICO &	
196		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On December 3, 2010, at 3:08 p.m., Matthew P. Leto (“Leto”), and Andrew C. Hall (“Andy Hall”), at Hall, Lamb and Hall, P.A. (“Hall & Lamb”), attorneys for Plaintiff Bridgeloan Investors, Inc., (“BRIDGELOAN”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, [file](#), with unclean hands, a **Notice of Hearing on Plaintiff’s Motion to Approve & Adopt Settlement Stipulation as to Intervenor MUNB Loan Holdings, LLC** (“Notice of Hearing Motion to Approve Intervenor BNY Mellon”), setting a hearing for December 16, 2010 at 8:15 a.m. Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Mellon to money launder and tax defraud the ill-gotten proceeds. BRIDGELOAN’s Notice of Hearing to Approve Intervenor BNY Mellon is predicated on false and contradictory statements contained in the sham pleadings, *inter alia*, Motion to Approve Intervenor BNY Mellon, that the Perpetrators all know in truth and in fact to be false.

COUNTS

Count 188 - 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 18 U.S.C. §371.

Count 189 - 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 190 – Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 191 - Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., 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 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 18 U.S.C. §1346.

Count 192– Mathew P. Leto, Andrew C. Hall, Hall Lamb and Hall P.A., and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, a certain U.S. Postal Mail with the Sham [Notice](#) of Hearing on Plaintiff's Motion to Approve & Adopt Settlement Stipulation as to Intervenor MUNB Loan Holdings, LLC by Matthew P. Leto, stating that: "*WE HEREBY CERTIFY that a true and correct copy of the foregoing was served via facsimile and U.S. mail on this 2nd day of December, 2010 to*": **(192a)** "*Thomas R. Lehman, Esq., and Patrick J. Rengstl, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131*"; and, **(192b)** to "*Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134*"; **(192c)** and to "*Erica English, Esq., Katz Barron Squitiero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, Florida 33133.*" By: /s/ Mathew P. Leto - Matthew P. Leto, in violation of, 18, U.S.C., § 1341.

Count 193 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Joseph Horn, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad

actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. (“BNY Mellon”) (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares (“Tavares”) of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares’s Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon’s Shareholders, in violation of, 18 U.S.C. §1344.

Count 194 – At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 195 - Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 196 – Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

197	December 13, 2010	U. S. CODE TITLE 18	Patrick J. Rengstl Thomas Ralph Lehman LKLS+G, LLP Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Nelson Slosbergas Bridgeloan Investors, Inc. The Continued Criminal Enterprise
198		§ 371 Conspiracy to Defraud the USA &	
199		§ 241 Conspiracy Against Rights &	
200		§ 242 Deprivation Rights Under Color of Law &	
201		§ 1346 Scheme/Artifice to Defraud &	
202		§ 1961 <i>et seq.</i> – RICO &	
203		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On December 13, 2010, Charles Tavares’s (“Tavares”) personal attorney [Patrick J. Rengstl](#) (“Rengstl”) at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), covertly and fraudulently representing client/ victim Tavares to deprive and extort Tavares’ Properties¹¹² in sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further the scheme, with unclean hands, produces a **sham Affidavit of Patrick J. Rengstl**, as “one of the attorneys at LKLS+G who represents Charles Tavares, MRPM, BVO, and 2147”, with a sham Letter of Intent¹¹³ (“Flick’s Sham Offer”) to buy Tavares’ Brickell Buildings for \$8.1 million by Associates of BRIDGELOAN’S Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”). The Perpetrators all know in truth and in fact that Flick’s Sham Offer forwarded by BRIDGELOAN’s implicated attorney Matthew P. Leto at Hall, Lamb, and Hall, P.A., is an artifice to devalue Tavares’ properties securing BRIDGELOAN’s sham \$12 million loan. The record shows the CCE is in desperate mode to quickly deprive and extort Tavares of both properties, valued over \$50 million, after learning Tavares is in negotiations with some Fortune 500 companies interested in buying Tavares’ Properties, requiring that all Associates and bad actors implicated in the extortion, to, *inter alia*, display their **Omertà Code** so the CCE can expeditiously extort Tavares of properties and rights, before Tavares is able to sell. The record displayed shows one Associate after another displaying **Omertà Code** so all implicated officers of the courts and Associates know there is no turning back to extorting Tavares.

¹¹² Tavares’s Two Properties, the Brickell Buildings owned by Tavares’ Companies’ Defendants Brickell Village One, LLC (“BV One”) and 2147 SW 8 Street, LLC (“2147”), and the 9 Acres Miami River Park Marina, Inc. (“MRPM”) (“Tavares’ Properties”).

¹¹³ At all relevant times, the Perpetrators know that Flick does not own or represent Tavares’ Brickell Buildings. Further, Flick’s Sham Offer by Richard Buck at Crescent, dated October 20, 2010, and fraudulently E-mailed on October 27, 2010 at 11:20 a.m., by BRIDGELOAN’s attorney Mathew P. Leto at Hall, Lamb and Hall, P.A., to Tavares’ personal and corporate attorney Rengstl at LKLS+G, states, among other things, “This proposal will expire if not accepted on or before October 26, 2010 at the close of the business day.” Horn, later, upon questioning, states that “Flick was at BRIDGELOAN’s offices and decided to make the offer”, which clearly shows the reckless conspiracy to systematically devalue Tavares’ properties to extort Tavares upon the courts.

COUNTS

Count 197 - 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 18 U.S.C. §371.

Count 198 - 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 199 - Patrick J. Rengstl, Thomas R. Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 200 - Patrick J. Rengstl, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Nelson Slosbergas, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Romulo Pina Dantas, Marco Emilio Rojas, Alan Samuel Fine, Jeffrey B. Flick, Richard A. Buck, Crescent Resources, LLC, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., 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 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 18 U.S.C. §1346.

Count 201 – At all times relevant, Patrick J. Rengstl, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 202 - Patrick J. Rengstl, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Nelson Slosbergas, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Romulo Pina Dantas, Marco Emilio Rojas, Alan Samuel Fine, Jeffrey B. Flick, Richard A. Buck, Crescent Resources, LLC, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 203 – Patrick J. Rengstl, Thomas Ralph Lehman, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

204	December 14, 2010	<u>U. S. CODE TITLE 18</u>	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Nelson Slosbergas Renata Carvalho Bertrand Bridgeloan Investors, Inc. The Continued Criminal Enterprise
205		§ 371 Conspiracy to Defraud the USA &	
206		§ 241 Conspiracy Against Rights &	
207		§ 242 Deprivation Rights Under Color of Law &	
208		§ 1346 Scheme/Artifice to Defraud &	
209		§ 1341 Mail Fraud &	
210		§ 1344 Bank Fraud &	
211		§ 1961 <i>et seq.</i> – RICO &	
212		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On December 14, 2010, at 3:08 p.m., [Matthew P. Leto](#) (“Leto”), and Andrew C. Hall (“Andy Hall”), at Hall, Lamb and Hall, P.A. (“Hall & Lamb”), attorneys for Plaintiff Bridgeloan Investors, Inc., (“BRIDGELOAN”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, [file](#), with unclean hands, a sham and contradictory [Notice for Non-Jury Trial](#) (“BRIDGELOAN’s Sham Notice Trial”). BRIDGELOAN, by and through its implicated attorneys Leto, Andy Hall, and Hall & Lamb, knowingly and intentionally, falsely state to the Miami Courts that: “*this action is at issue and notices this cause for non-jury trial. It is estimated that the case will take approximately 2-3 days for trial.*” BRIDGELOAN, Leto, Andy Hall, and Hall & Lamb, all know that, in truth and in fact, their Notice for Non-Jury Trial is false, and directly contradicts [Florida Rule of Civil Procedure 1.440\(a\)](#), regulating when a cause is “*at issue*”, and allowing a party to give a notice of trial. The record displayed clearly shows the cause is not at issue because there are numerous undisposed¹¹⁴ motions by the court, demonstrating that the BRIDGELOAN cause is clearly not at issue pursuant to *Fla. R. Civ. P. 1.440(a)*. BRIDGELOAN, Leto, Andy Hall, in reckless disregard for the rule of law and Tavares’ rights to due process, proceeds with the scheme to extort Tavares, under color of law, of properties and rights upon subverted proceedings, displaying the CCE’s ***Omertà Code***.

¹¹⁴ See, among others undisposed motions and issues before the court, BRIDGELOAN’s Motion to Approve & Adopt Settlement Stipulation as to Intervenor MUNB Loan Holdings, LLC, to be heard in a [set](#) Hearing of December 16, 2010 at 8:15 a.m.; and, BRIDGELOAN’s Motion for Summary Judgment to be heard in a [set](#) Hearing of December 16, 2010 at 10:30 a.m., clearly demonstrating that BRIDGELOAN’s Notice for Non-Jury Trial is improper, contradicting *Fla. R. Civ. P. 1.440(a)*. See Record.

COUNTS

Count 204 - 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 18 U.S.C. §371.

Count 205 - 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 206 – Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 207 - Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., 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 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 18 U.S.C. §1346.

Count 208 - Mathew P. Leto, Andrew C. Hall, Hall Lamb and Hall P.A., and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, a certain U.S. Postal Mail with the Sham [Notice for Non-Jury Trial of December 14, 2010](#) by Matthew P. Leto, stating that: *"WE HEREBY CERTIFY that a true and correct copy of the foregoing was served via facsimile and U.S. mail on this 14th day of 2010 to":* **(208a)** *"Thomas R. Lehman, Esq., and Patrick J. Rengstl, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131";* and, **(208b)** *to "Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; (208c)* and to: *"Erica English, Esq., Katz Barron Squitiero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, Florida 33133."* By: /s/ Mathew P. Leto - Matthew P. Leto, in violation of, 18, U.S.C., § 1341.

Count 209 - Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. ("BNY Mellon") (NYSE: BK) by

artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares (“Tavares”) of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares’s Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon’s Shareholders, in violation of, 18 U.S.C. §1344.

Count 209 – At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 210 - Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 211 – Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

212	December 15, 2010	U. S. CODE TITLE 18	Allan Lester Langer Miami Courts The Criminal Enterprise (CCE)
213		§ 371 Conspiracy to Defraud the USA	
214		&	
215		§ 241 Conspiracy Against Rights	
216		&	
217		§ 242 Deprivation of Rights -Under Color of Law	
218		&	
219		§ 1346 Scheme/Artifice to Defraud	
		§ 1341 Mail Fraud	
		&	
		§ 1961 <i>et seq.</i> – RICO	
		&	
		FLORIDA STATUTES	
		TITLE XLVI § 817.155 Fraudulent Practices	
		&	
		FLORIDA CODE OF JUDICIAL CONDUCT	
		Violations of Canons 1, 2, and 3	

On December 15, 2010, Judge [Allan Lester Langer](#) (“Judge Langer”)(Florida Bar No.137.828), in reckless disregard for the law and rights, *inter alia*, Florida Rule of Civil Procedure 1.440, and Due Process of Law under the Fifth and Fourteenth Amendments of the U.S. Constitution, enters a [Sham Order for Trial](#)¹¹⁵ (“**Sham Trial Order of 12/15/2010**”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law. Unknown to borrower/victim Tavares at the time, BRIDGELoAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELoAN. The sham \$12 million loan by sham lender BRIDGELoAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELoAN and BNY Melon to money launder and tax defraud the ill-gotten proceeds. Corrupt Judge Langer signs the Sham Trial Order of 12/15/2010, to further the scheme, after implicated Associates of the CCE display in the record their **Omertà Code**, showing that, they knowingly and intentionally displaying violations of law in the record, allowing Judge Langer to know that all Perpetrators are willfully committing crimes upon the court, by officers of the courts, *et al.*, so they can proceed with the extortion of Tavares under color of law.

¹¹⁵ Reckless Judge Langer, knowingly and intentionally, enters the Sham Trial Order of 12/15/2010, to further the brazen scheme extorting tavares of properties and rights, under color of law, directly contradicting *Fla. R. Civ. P. 1.440*, Due Process of Law, and rights, because Judge Langer knows that the cause is not at issue, and clearly it is not ready to be set for trial since the record displayed shows, among other things, two undisposed motions, BRIDGELoAN’s Motion to Approve & Adopt Settlement Stipulation as to Intervenor MUNB Loan Holdings, LLC, [set](#) for Hearing of December 16, 2010 at 8:15 a.m.; and, BRIDGELoAN’s Motion for Summary Judgment [set](#) for Hearing of December 16, 2010 at 10:30 a.m., both to be heard and disposed by Judge Langer, showing Judge Langer is clearly shamelessly corrupted by the CCE’s scheme.

COUNTS

Count 212 - 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 18 U.S.C. §371.

Count 213 - Judge Allan Lester Langer, the 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 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 legal representation free from intimidation, harassment, and extortion of properties and rights upon a Bankruptcy Federal Court in the USA, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

Count 214 – Judge Allan Lester Langer, the Miami Courts, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 215 - Judge Allan Lester Langer, the 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 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 216 - Judge Allan Lester Langer, the Miami Courts, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, a certain U.S. Postal Mail with the [Sham Trial Order of 12/15/2010](#), by Judge Allan Lester Langer, to further a scheme extorting Charles Tavares of properties and rights under color of law, in subverted proceedings, fraudulently setting the BRIDGELoan Case for trial, contrary to, *inter alia*, Fla. R. Civ. P. 1.440 and Tavares' rights, **(216a)** to: "Andrew C. Hall, Esq., 2665 South Bayshore Drive #PH-1, Miami, FL 33133; **(216b)** to: "Thomas R. Lehman, Esq 201 S. Biscayne Blvd., #34 Floor Miami, FL 33131"; **(216c)** to "Jorge L. Fors, Esq., 1108 Ponce de Leon, Coral Gables, FL 33134; **(216d)** and to: "Erica English, Esq., 2699 S. Bayshore Drive, #7 Floor, Miami, Florida 33133." By: /s/ Judge Lester Langer - Lester Langer a.k.a. Allan Lester Langer, Circuit Court Judge, in violation of, 18, U.S.C., § 1341.

Count 217 – At all times relevant, Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, Brideloan Investors, Inc., BNY Mellon, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 218 - Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, Brideloan Investors, Inc., BNY Mellon, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 219 – Judge Allan Lester Langer, 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

220	December 16, 2010	U. S. CODE TITLE 18	Allan Lester Langer Miami Courts The Criminal Enterprise (CCE)
221		§ 371 Conspiracy to Defraud the USA &	
222		§ 241 Conspiracy Against Rights &	
223		§ 242 Deprivation of Rights -Under Color of Law &	
224		§ 1346 Scheme/Artifice to Defraud &	
225		§ 1961 <i>et seq.</i> – RICO &	
226		FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices & FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	

On December 16, 2010, reckless Judge [Allan Lester Langer](#) (“Judge Langer”) (Florida Bar No.137.828), in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, displaying **Omertà Code** to the Associates of the CCE, furthering the scheme, signs an [Order Granting](#) (“**Order Granting MUNB as Intervenor**”) BRIDGELOAN’s Motion to Approve and Adopt Settlement Stipulation as to Intervenor MUNB Loan Holdings, LLC a.k.a. BNY Mellon (“Motion to Approve Intervenor MUNB”). The disposition of BRIDGELOAN’s Motion to Approve Intervenor MUNB, shows among other things, that the cause was not at issue, pursuant [Florida Rule of Civil Procedure 1.440\(a\)](#), when, on December 15, 2010, reckless Judge Langer entered to further the scheme, a sham [Notice for Trial of 10/15/2010](#). Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Mellon to money launder and tax defraud the ill-gotten proceeds. Because the CCE learns from Tavares’ personal and corporate attorneys, among others, [Thomas R. Lehman](#), [Patrick J. Rengstl](#), [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (LKLS+G”), and [Marco E. Rojas](#), corruptly and covertly, at all relevant times, falsely and fraudulently representing client/victim Tavares to further BRIDGELOAN’s scheme to extort Tavares, that Tavares is [negotiations to sell](#) to, among other prospective buyers, a Fortune 500 company, one of Tavares’ two properties to pay off the sham loan, the CCE goes into desperate mode to finalize the extortion of Tavares’ properties and rights, under color of law, before Tavares is able sell, and successfully escape the extortion, as Tavares did before, in the Brickell Premier Project. See Record.

COUNTS

Count 220 - 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 18 U.S.C. §371.

Count 221 - Judge Allan Lester Langer, the 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 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 legal representation free from intimidation, harassment, and extortion of properties and rights upon a Bankruptcy Federal Court in the USA, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

Count 222 – Judge Allan Lester Langer, the Miami Courts, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 223 - Judge Allan Lester Langer, the 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 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 224 – At all times relevant, Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, Brideloan Investors, Inc., BNY Mellon, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 225 - Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, Brideloan Investors, Inc., BNY Mellon, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 226 – Judge Allan Lester Langer, 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

227	December 16, 2010	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights -Under Color of Law & § 1346 Scheme/Artifice to Defraud & § 1961 <i>et seq.</i> – RICO & FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices & FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	Allan Lester Langer Miami Courts The Criminal Enterprise (CCE)
228			
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On December 16, 2010, reckless Judge [Allan Lester Langer](#) (“Judge Langer”) (Florida Bar No.137.828), in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, displaying **Omertà Code** to the Associates of the CCE, furthering the scheme, signs an [Order Denying](#) (“**Order Denying Summary Judgement**”) on BRIDGELOAN’s Motion for Summary Judgment. The disposition of BRIDGELOAN’s Motion for Summary Judgment shows among other things, that the cause was not at issue, pursuant [Florida Rule of Civil Procedure 1.440\(a\)](#), when, on December 15, 2010, reckless Judge Langer entered, to further the scheme, a sham [Notice for Trial of 10/15/2010](#). Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Melon to money launder and tax defraud the ill-gotten proceeds. Because the CCE learns from Tavares’ personal and corporate attorneys, among others, Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (LKLS+G”), and Marco E. Rojas, corruptly and covertly, at all relevant times, falsely and fraudulently representing client/victim Tavares to further BRIDGELOAN’s scheme to extort Tavares, that Tavares is [negotiations to sell](#) to, among other prospective buyers, a Fortune 500 company, one of Tavares’ two properties to pay off the sham loan, the CCE goes into desperate mode to finalize the extortion of Tavares’ properties and rights, under color of law, before Tavares is able to sell, and successfully escape the extortion, as Tavares did before, in the Brickell Premier Project. See Record.

COUNTS

Count 227 - 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 18 U.S.C. §371.

Count 228 - Judge Allan Lester Langer, the 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 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 legal representation free from intimidation, harassment, and extortion of properties and rights upon a Bankruptcy Federal Court in the USA, in violation of, among other things, 18 U.S.C. §241. *See, e.g.*, U.S. Const., Amend. XIV.

Count 229 – Judge Allan Lester Langer, the Miami Courts, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 230 - Judge Allan Lester Langer, the 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 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 231 – At all times relevant, Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, Brideloan Investors, Inc., BNY Mellon, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 232 - Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, Brideloan Investors, Inc., BNY Mellon, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 233 – Judge Allan Lester Langer, 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

234	December 28, 2010	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A.
235		§ 241 Conspiracy Against Rights &	Norman Stuart Gerstein Joseph Horn
236		§ 242 Deprivation Rights Under Color of Law &	Ralph Horn Ricardo Eichenwald
237		§ 1346 Scheme/Artifice to Defraud &	Fernando Braghin Daniel Ades
238		§ 1341 Mail Fraud &	Nelson Slosbergas Bridgeloan Investors, Inc.
239		§ 1344 Bank Fraud &	Erica Lee English Harold Eugene Lindsey III
240		§ 1961 <i>et seq.</i> – RICO &	Katz Barron Squitiero Faust The Bank of New York Mellon
241		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	Thomas Ralph Lehman Patrick J. Rengstl
242		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d) &	LKLS+G, LLP Alan Samuel Fine Romulo Pina Dantas Allan Lester Langer
			Florida Judicial Code of Conduct – Canons 1,2,3

On December 28, 2010 at 4:22 p.m., Matthew P. Leto (“Leto”), and Andrew C. Hall at Hall, Lamb and Hall, P.A. (“Hall & Lamb”), attorneys for Plaintiff Bridgeloan Investors, Inc., (“BRIDGELOAN”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, file, with unclean hands, a [Notice of Stipulation of Sham Mediator Norman Gerstein](#) (“**Notice Sham Mediator Norman Gerstein**”), pursuant to corrupt Judge [Allan Lester Langer](#)’s sham Order of Mediation of December 15, 2010, fraudulently entered, in violation of, *inter alia*, Florida Rule of Civil Procedure 1.440(a), and the Due Process Clause under the Fifth and Fourteenth Amendments U.S. Constitution, to further the brazen scheme extorting Tavares. Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Mellon to money launder and tax defraud the ill-gotten proceeds. The CCE’s hastily artifice to extort Tavares in a sham mediation set to be held at Hall & Lamb’s offices, mediated by sham mediator Norman Gerstein – [based at same offices as Hall & Lamb, irreconcilably agreed](#) by the Perpetrators to extort, shows the scheme, and desperation by the Perpetrators upon learning from Tavares’s corrupt attorneys at LKLS+G that [Tavares is in negotiations to sell one of the two properties](#), valued over \$50 million dollars, to pay off

the sham loan. Because, at all relevant times, BRIDGELoAN, and BNY Mellon Bank's intent was never to simply receive interest payments and get paid the principal loan amount, they systematically, knowingly and intentionally, perpetrate torts to successfully interfere with the loan and cause its default, allowing them to deprive, steal, and extort, under color of law, in sham proceedings, Tavares of all collateral assets securing the sham loan, and further money laundering the ill-gotten proceeds, and creating millions of dollars in sham interest and portfolio interest-free bond deductions and credits, to defraud the United States of America of, *inter alia*, taxes on earned income. At all relevant times, the Perpetrators know, and agree to, the sham Mediation by sham mediator Norma Gerstein, as an artifice to further the brazen extortion, under color of law, of Tavares properties and rights. See Record.

COUNTS

Count 234 - 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 18 U.S.C. §371.

Count 235 - 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 236 - Matthew P. Leto, Andrew C. Hall, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 237 - Matthew P. Leto, Andrew C. Hall, Bridgeloan Investors, Inc., BNY Mellon, 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 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 18 U.S.C. §1346.

Count 238 - Matthew P. Leto, Andrew C. Hall, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit -- among others, certain U.S. Postal Mail with sham pleadings to further the scheme upon the courts extorting Charles Tavares of properties and rights, the bogus [Notice Sham Mediator Norman Gerstein](#) to further the scheme: **(238a)** dated, December 28, 2010, to: "Thomas R. Lehman, Esq., and Patrick J. Rengstl, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131"; to **(238b)** to: "Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon Boulevard, Coral Gables, FL,

33134”; and, (238c) to: “Erica L. English, Esq., Katz Barron Squitiero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133 - *Certificate of Service – We Hereby Certify that a true and correct copy of the foregoing was served via facsimile and via U.S. Mail to all parties on the attached service list on this 28th day of December, 2010. By: /s/ Mathew P. Leto, in violation of, 18, U.S.C.,§ 1341.*

Count 239 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Bridgeloan Investors, Inc., BNY Mellon, Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. (“BNY Mellon”) (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares (“Tavares”) of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares’s Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon’s Shareholders, in violation of, 18 U.S.C. §1344.

Count 240 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 241 - Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Bridgeloan Investors, Inc., BNY Mellon, Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 242 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Norman Gerstein, Nelson Slosbergas, Erica L. English, Harold Eugene Lindsey III, Katz Barron Squitiero Faust, Thomas Ralph Lehman, Patrick J. Rensgtl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

Count 243 – Judge Allan Lester Langer, 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

244	January 18 and 19, 2011	<u>U. S. CODE TITLE 18</u>	Thomas Ralph Lehman Robin Barrera Patrick J. Rengstl LKLS+G, LLP The Continued Criminal Enterprise
245		§ 371 Conspiracy to Defraud the USA &	
246		§ 241 Conspiracy Against Rights &	
247		§ 242 Deprivation Rights Under Color of Law &	
248		§ 1346 Scheme/Artifice to Defraud &	
249		§ 1343 Mail Fraud &	
250		§ 1951 Extortion (HOBBS ACT)	
251		§ 1961 <i>et seq.</i> – RICO &	
252		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On January 18 and 19, 2011, Charles Tavares’s (“Tavares”) personal and corporate attorneys, Thomas R. Lehman (“Lehman”), [Patrick J. Rengstl](#) (“Rengstl”), and Robin Barrera (“Barrera”), at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), covertly and fraudulently representing client/victim Tavares to deprive and extort Tavares’ Properties¹¹⁶ in sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a continuing artifice to coerce and extort Tavares to enter into a sham¹¹⁷ settlement with BRIDGELOAN and Tavares’ Investor, and Third-Party Defendant, Romulo Pina Dantas (“Dantas”), [transmits emails](#), on January 18, 2011 at 9:25 p.m., and on January 19, 2011 at 5:58 p.m., with an attachment, with a draft sham Settlement Agreement between Tavares and Dantas (“**Sham Settlement Draft**”). Lehman and LKLS+G, at all relevant times, are knowingly and intentionally covertly acting to further Tavares’ extortion by BRIDGELOAN’S Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), fraudulently misrepresenting Tavares’ cause in the instant-action, systematically coercing Tavares to accept sham settlements, while willfully failing to properly pursue Tavares’ meritorious cause,

¹¹⁶ Tavares’s Two Properties, the Brickell Buildings owned by Tavares’ Companies’ Defendants Brickell Village One, LLC (“BV One”) and 2147 SW 8 Street, LLC (“2147”), and the 9 Acres Miami River Park Marina, Inc. (“MRPM”) (“Tavares’ Properties”).

¹¹⁷ The sham settlement is an artifice to extort Tavares’ Two Properties (“collateral properties”), valued over \$50 million dollars, securing the sham loan, by coercing Tavares to agree to surrender [Tavares’ sole control and legal authority of Tavares’ Companies BV One, 2147, and MRPM](#), see also [Tavares’ Affidavit](#), holding title to Tavares’ Properties, allowing the CCE to extort Tavares’ Properties, as BRIDGELOAN’s CCE is desperate to consummate the scheme after learning from [Lehman that Tavares is close to a sale of one of the properties](#), allowing Tavares to pay off the sham loan, and keeping the other property. See Record.

and unduly charging Tavares legal fees to deprive, steal, and extort Tavares. The sham settlement artifice developed by Lehman, Marco E. Rojas (“Rojas”), BRIDGELoAN, and BRIDGELoAN’s Associate Alan S. Fine (“Fine”), falsely and covertly representing Dantas, is to prevent Tavares from successfully paying off BRIDGELoAN and Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon’s (“BNY Mellon”) sham \$12 million dollars loan. Lehman, on January 18, 2011, at 9:25 p.m., states, *inter alia*, “Charles, attached is a draft of a proposed settlement agreement with Romulo. Please call me to discuss. Bridgeloan is pressing its foreclosure suit so I want to get a deal for you to get money out of both properties...” On January 19, 2011, at 5:58 p.m., Lehman, to further the scheme, emails Robin Barrera at LKLS+G. The record obtained in August 2013, in the Related *Tavares v. Lehman & LKLS+G*, shows that, the only thing Lehman and LKLS+G “wanted,” and tirelessly worked for, is to con, coerce, and extort Tavares of properties and rights. See Record.

COUNTS

Count 244 - 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 18 U.S.C. §371.

Count 245 - 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 246 - Thomas R. Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 247 - Thomas R. Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, 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 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 18 U.S.C. §1346.

Count 248 – Thomas R. Lehman (“Lehman”), Robin Barrera (“Barrera”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, conning, coercing, depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, [certain E-mails containing a proposed sham fraudulent settlement to extort Tavares of properties of rights; \(248a\)](#) on January 18, 2011 at 9:25 p.m., from Lehman (trl@lkllaw.com) to Tavares (ctavares@bellsouth.net); and, **(248b)** on January 19, 2011 at 5:58 p.m.. from Lehman (trl@lkllaw.com) to Robin Barrera at LKLS+G, in violation of 18 U.S.C. §1343.

Count 249 – Thomas Ralph Lehman, Roin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, intimidate, and extort Charles Tavares of properties and rights, in order to further a continuous scheme depriving stealing, and extorting his properties, 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 250 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

Count 251 - Thomas Ralph Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, systematically conning, coercing and extorting Tavares to accept a fraudulent settlement 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 252 –Thomas Ralph Lehman, Patrick J. Rengstl, Marco E. Rojas, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

253	January 25, 2011	<u>U. S. CODE TITLE 18</u>	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Nelson Slosbergas Renata Carvalho Bertrand Bridgeloan Investors, Inc. The Continued Criminal Enterprise
254		§ 371 Conspiracy to Defraud the USA &	
255		§ 241 Conspiracy Against Rights &	
256		§ 242 Deprivation Rights Under Color of Law &	
257		§ 1346 Scheme/Artifice to Defraud &	
258		§ 1341 Mail Fraud &	
259		§ 1344 Bank Fraud &	
260		§ 1961 <i>et seq.</i> – RICO &	
270		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On January 25, 2011, at 1:44 p.m., Matthew P. Leto (“Leto”), and Andrew C. Hall (“Andy Hall”), at Hall, Lamb and Hall, P.A. (“Hall & Lamb”), attorneys for Plaintiff Bridgeloan Investors, Inc., (“BRIDGELOAN”) in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, [file](#), with unclean hands, a Motion for Leave to File BRIDGELOAN’s Amended Complaint (“**BRIDGELOAN’S Amended Complaint**”), Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Melon to money launder and tax defraud the ill-gotten proceeds. BRIDGELOAN’s Amended Complaint is predicated on false and contradictory statements contained in the sham pleadings, *inter alia*, that: “*On or about July 21, 2007, Bridgeloan Investors, Inc. (“Bridgeloan”) authorized a loan to Defendants, Miami River Park Marina, Inc. (“Miami River”), Brickell Village One, LLC (“Brickell”), and 2147 SW 8 Street, LLC (“2147 SW 8 Street”), in the original principal amount of Seven Million Dollars (\$7,000,000.00) (the “Loan”) for use in connection with a plan to develop certain real estate in Miami..*” see ¶ 11; and, “*On July 2, 2007 and pursuant to a Future Advance of \$5,000,000.00, the total principal amount of the loan owed by Miami River, Brickell, and 2147 SW 8 Street increased to \$12,000,000.00,*” see ¶ 31. BRIDGELOAN’s sham Amended Complaint is willfully patently false and contradictory, displaying BRIDGELOAN and Hall & Lamb’s **Omertà Code**, committing to the extortion.

COUNTS

Count 253- 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 18 U.S.C. §371.

Count 254 - 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 255 – Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 256 - Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Bridgeloan Investors, Inc., 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 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 18 U.S.C. §1346.

Count 257– Mathew P. Leto, Andrew C. Hall, Hall Lamb and Hall P.A., and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, a certain U.S. Postal Mail with the [Sham BRIDGELOAN'S Amended Motion for Leave to File Amended Complaint](#), by Matthew P. Leto, stating that: "*WE HEREBY CERTIFY that a true and correct copy of the foregoing was served via facsimile and U.S. mail on this 25th day of January, 2011 to*: **(257a)** "*Patrick J. Rengstl, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131*"; and, **(257b)** to "*Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134*; **(257c)** and to: "*Erica English, Esq., Katz Barron Squitiero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, Florida 33133.*" By: /s/ Mathew P. Leto - Matthew P. Leto, in violation of, 18, U.S.C., § 1341.

Count 258 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Joseph Horn, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad

actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. (“BNY Mellon”) (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares (“Tavares”) of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares’s Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon’s Shareholders, in violation of, 18 U.S.C. §1344.

Count 259 – At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 260 - Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Nelson Slosbergas, Renata Carvalho Bertrand, Bridgeloan Investors, Inc., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 261 – Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Leto, P.A., and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

262	January 26 and 27, 2011	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Robin Barrera Patrick J. Rengstl LKLS+G, LLP The Continued Criminal Enterprise
263		§ 241 Conspiracy Against Rights &	
264		§ 242 Deprivation Rights Under Color of Law &	
265		§ 1346 Scheme/Artifice to Defraud &	
266		§ 1343 Wire Fraud &	
267		§ 1961 <i>et seq.</i> – RICO &	
268		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices &	
269		<u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On January 26 and 27 2011, Charles Tavares’s (“Tavares”) personal and corporate attorneys, Thomas R. Lehman (“Lehman”), and Robin Barrera (“Barrera”), at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), covertly and fraudulently representing client/victim Tavares to deprive and extort Tavares’ Properties in sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a continuing artifice to coerce and extort Tavares to enter into a sham settlement with BRIDGELOAN and Tavares’ Investor, and Third-Party Defendant, Romulo Pina Dantas (“Dantas”), [transmits emails](#), on January 26, 2011 at 4:48 p.m., and on January 27, 2011 at 3:40 p.m., with an attachment (ER3645.docx) containing a draft for the sham proposed Settlement Agreement between Tavares and Dantas (“**Sham Settlement Draft**”). Lehman and LKLS+G, at all relevant times, are knowingly and intentionally covertly acting to further Tavares’ extortion by BRIDGELOAN’S Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), fraudulently misrepresenting Tavares’ cause in the instant-action, systematically coercing Tavares to accept sham settlements, while willfully failing to properly pursue Tavares’ meritorious cause, and unduly charging Tavares legal fees to deprive, steal, and extort Tavares. The sham settlement artifice developed by Lehman, Marco E. Rojas (“Rojas”), BRIDGELOAN, and BRIDGELOAN’s Associate Alan S. Fine (“Fine”), falsely and covertly representing Dantas, is to prevent Tavares from successfully paying off BRIDGELOAN and Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon’s (“BNY Mellon”) sham \$12 million dollars loan. Lehman, on January 26, 2011, at 4:48 p.m., states, *inter alia*, “Subject: FW: Brickell Village – Settlement Agreement (redlined to reflect edits 1/26). Attached is a redline of the Settlement Agreement showing the changes you

Requested. Okay to send to Alan Fine?" On January 27, 2011, at 3:40 p.m., Lehman, to further the scheme, emails Tavares, stating: *"Subject: FW: Brickell Village – Settlement Agreement (redlined –1/27) Attachments: ER3645.docx - Charles, Alan Fine asked that I make the attached edits to the Settlement Agreement and send a revised agreement and he will sent it to Romulo. The revised agreement drops Menezes as a party and the rest of the changes are not material. Let me know if you have any objections to me sending Alan the revised agreement. Thanks. Thomas R. Lehman"* The record obtained in August 2013, in the Related *Tavares v. Lehman & LKLS+G*, shows that, the only thing Lehman and LKLS+G *"wanted,"* and tirelessly worked for, is to con, coerce, and extort Tavares of properties and rights. See Record.

COUNTS

Count 262 - 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 18 U.S.C. §371.

Count 263 - 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 264 - Thomas R. Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 265 - Thomas R. Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, 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 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 18 U.S.C. §1346.

Count 266 – Thomas R. Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, conning, coercing, depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, certain E-mails containing a proposed sham settlement to extort Tavares of properties and rights; **(266a)** on January 26, 2011 at 4:48 p.m., from Lehman (trl@lkllaw.com) to Tavares (ctavares@bellsouth.net); and, **(266b)** on January 27, 2011 at 3:40 p.m., from Lehman (trl@lkllaw.com) to Charles Tavares (ctavares@bellsouth.net), in violation of 18 U.S.C. §1343.

Count 267 – Thomas Ralph Lehman, Roin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, intimidate, and extort Charles Tavares of properties and rights, in order to further a continuous scheme depriving stealing, and extorting his properties, 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 268 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 269 - Thomas Ralph Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, systematically conning, coercing and extorting Tavares to accept a fraudulent settlement 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 270 –Thomas Ralph Lehman, Patrick J. Rengstl, Marco E. Rojas, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

271	January 26 and 27, 2011	<u>U. S. CODE TITLE 18</u>	Thomas Ralph Lehman Robin Barrera Patrick J. Rengstl LKLS+G, LLP The Continued Criminal Enterprise
272		§ 371 Conspiracy to Defraud the USA &	
273		§ 241 Conspiracy Against Rights &	
274		§ 242 Deprivation Rights Under Color of Law &	
275		§ 1346 Scheme/Artifice to Defraud &	
276		§ 1343 Wire Fraud &	
277		§ 1961 <i>et seq.</i> – RICO &	
278		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On January 26 and 27 2011, Charles Tavares’s (“Tavares”) personal and corporate attorneys, Thomas R. Lehman (“Lehman”), and Robin Barrera (“Barrera”), at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), covertly and fraudulently representing client/victim Tavares to deprive and extort Tavares’ Properties in sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a continuing artifice to coerce and extort Tavares to enter into a sham settlement with BRIDGELoAN and Tavares’ Investor, and Third-Party Defendant, Romulo Pina Dantas (“Dantas”), [transmits emails](#), on January 26, 2011 at 4:48 p.m., and on January 27, 2011 at 3:40 p.m., with an attachment (ER3645.docx) containing a draft for the sham proposed Settlement Agreement between Tavares and Dantas (“**Sham Settlement Draft**”). Lehman and LKLS+G, at all relevant times, are knowingly and intentionally covertly acting to further Tavares’ extortion by BRIDGELoAN’S Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), fraudulently misrepresenting Tavares’ cause in the instant-action, systematically coercing Tavares to accept sham settlements, while willfully failing to properly pursue Tavares’ meritorious cause, and unduly charging Tavares legal fees to deprive, steal, and extort Tavares. The sham settlement artifice developed by Lehman, Marco E. Rojas (“Rojas”), BRIDGELoAN, and BRIDGELoAN’s Associate Alan S. Fine (“Fine”), falsely and covertly representing Dantas, is to prevent Tavares from successfully paying off BRIDGELoAN and Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon’s (“BNY Mellon”) sham \$12 million dollars loan. Lehman, on January 26, 2011, at 4:48 p.m., states, *inter alia*, “Subject: FW: Brickell Village – Settlement Agreement (redlined to reflect edits 1/26). Attached is a redline of the Settlement Agreement showing the changes you Requested. Okay to send to Alan Fine?” On January 27, 2011, at 3:40 p.m., Lehman, to further the scheme, emails Tavares, stating: “Subject: FW: Brickell Village – Settlement Agreement (redlined –1/27)

Attachments: ER3645.docx - Charles, Alan Fine asked that I make the attached edits to the Settlement Agreement and send a revised agreement and he will sent it to Romulo. The revised agreement drops Menezes as a party and the rest of the changes are not material. Let me know if you have any objections to me sending Alan the revised agreement. Thanks. Thomas R. Lehman" The record obtained in August 2013, in the Related *Tavares v. Lehman & LKLS+G*, shows that, the only thing Lehman and LKLS+G "wanted," and tirelessly worked for, is to con, coerce, and extort Tavares of properties and rights. See Record.

COUNTS

Count 271 - 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 18 U.S.C. §371.

Count 272 - 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 273 - Thomas R. Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 274 - Thomas R. Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, 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 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 18 U.S.C. §1346.

Count 275 – Thomas R. Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, conning, coercing, depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, certain E-mails containing a proposed sham settlement to extort Tavares of properties and rights; **(275a)** on January 26, 2011 at 4:48 p.m., from Lehman (trl@lkllaw.com) to Tavares (ctavares@bellsouth.net); and, **(275b)** on January 27, 2011 at 3:40 p.m., from Lehman (trl@lkllaw.com) to Charles Tavares (ctavares@bellsouth.net), in violation of 18 U.S.C. §1343.

Count 276 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

Count 277 - Thomas Ralph Lehman, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, systematically conning, coercing and extorting Tavares to accept a fraudulent settlement 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 278 –Thomas Ralph Lehman, Patrick J. Rengstl, Marco E. Rojas, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

279	From January 31 through February 3, 2011 and Continuing	<u>U. S. CODE TITLE 18</u>	Thomas Ralph Lehman Patrick J. Rengstl Robin Barrera LKLS+G, LLP Marco Emilio Rojas Alan Samuel Fine Romulo Pina Dantas Olten Ayres de Abreu Jr. The Continued Criminal Enterprise
280		§ 371 Conspiracy to Defraud the USA &	
281		§ 241 Conspiracy Against Rights &	
282		§ 242 Deprivation Rights Under Color of Law &	
283		§ 1346 Scheme/Artifice to Defraud &	
284		§ 1343 Wire Fraud &	
285		§ 1961 <i>et seq.</i> – RICO &	
286		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

From January 31, through February 3, 2011, and continuing, Charles Tavares’s (“Tavares”) personal and corporate attorneys, [Thomas R. Lehman](#) (“Lehman”), Patrick J. Rengstl (“Rengstl”), Robin Barrera (“Barrera”) and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), covertly and fraudulently representing, in fatal conflict of interest, client/victim Tavares, to deprive and extort Tavares’ Properties upon sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, continuing artifices to con, coerce, and extort Tavares to enter into a sham settlement (“Sham Settlement”) with Tavares’ Investor, and Third-Party Defendant, [Romulo Pina Dantas](#) (“Dantas”), showing Dantas is also fraudulently represented [in fatal conflict of interest](#) by [Alan S. Fine](#) (“Fine”), exchange [certain E-mails](#) to further the scheme with client/victim Tavares and Associates.¹¹⁸ Lehman, *et al.*, change tactics after unsuccessfully, since July 2010, trying to con and coerce Tavares to sign the Sham Settlement giving control over Tavares’ Companies Defendants, and Tavares’ Properties, so the CCE can easily deprive and extort Tavares’ Properties and rights. The CCE’s new artifice, is for Fine to call Lehman’s *conflict of interest for* representing Tavares individually and Tavares’ Companies, so they can coerce Tavares’ new attorneys.¹¹⁹ Lehman, Fine, *et al.*, at all relevant times, know that they are, knowingly and intentionally falsely and fraudulently representing Tavares and Dantas in fatal conflict of interest to further the CCE’s scheme.

¹¹⁸ Unknown to Tavares at the time, one of the reasons Fine is covertly and fraudulently representing Tavares’ investor and Third-Party Defendant Dantas, not making an appearance on the record of the BRIDGELOAN Case, is because Fine is a [longtime Associate of BRIDGELOAN’s](#) Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), covertly acting to further the scheme to deprive, steal, and extort Tavares of Tavares’s Two Properties, the Brickell Buildings and the 9 Acres Miami River Marina Property, valued over \$50 million dollars securing a sham loan by BRIDGELOAN and its associate and longtime enabler, Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC n.k.a. The Bank of New York Mellon (“BNY Mellon”).

¹¹⁹ [On February 1, 2011](#), Tavares, after discussing the basic issues of the BRIDGELOAN case with attorney [Roy Black](#) (“Roy Black”) at [Black Srebnick Kornspan & Syumpf, P.A.](#) (“BSK&S” or “Black Srebnick”), retains Roy Black’s law firm.

The new artifice to con, coerce and extort Tavares to sign a Sham Settlement with Dantas, brings Dantas longtime Brazilian attorney and fixer, [Olten Ayres de Abreu Jr.](#)¹²⁰ (“Abreu Jr.”), based in [Switzerland](#) and in [Brazil](#), to Miami, FL, further the scheme. The record obtained in the Related Case *Tavares v. Lehman & LKLS+G*, Case No. 2013-12223-CA-40, shows, *inter alia*, behind the scenes, Lehman, Fine, and Abreu Jr., quickly corrupted Tavares’ new attorneys at Black & Srebnick, continuing systematically to further the scheme defrauding client/victim Tavares with artifices to extort, improperly providing confidential client/attorney information to BRIDGELoAN about Tavares’ negotiations to sell one of the properties to pay off the sham loan, interfering with Tavares’ investors and partners, successfully coercing appraisers to devalue Tavares’ properties, intentionally and knowingly, failing to prepare for a trial to defend Tavares and Tavares’s Companies meritorious claims against sham lender BRIDGELoAN and enabler BNY Mellon, fabricating false, invalid, and fraudulent Affidavits, and sham corporate resolutions, willfully failing to follow Tavares’ orders to file for Bankruptcy protection, repeatedly extorting Tavares not to fight the scheme, and to continue cover up the scheme after being exposed and fired by Tavares, as the sole legal authority for Tavares’ Companies Defendants Miami River Park Marina, Inc., (“MRPM”), Brickell Village One, LLC (“B V One”), and 2147 SW 8 Street, LLC (“2147”), fraudulently staying, for sixteen (16) months, in the BRIDGELoAN Case – and despite two Florida Bar Complaints, to prevent justice and cover up the massive frauds upon the court, by officers of the court, successfully furthering the scheme depriving, stealing, and extorting Tavares, under color of law, of properties and rights.

¹²⁰ Abreu Jr. a.k.a. “*The Money Bag Man*”, is a reckless attorney and fixer, at the time, based in Gevena, Switzerland at [FBT Avocats S.A.](#), and at [Abreu Junior & Associados](#) in São Paulo, Brazil, and now, at [Wilhelm Gilliéron Avocats](#) in Lausanne, Switzerland, and at [Abreu Jr. Advogados Corp.](#), in the Republic of Panamá – showing Associate Ramon Anzola-Robles’ (“Anzola-Robles”) Anzola-Robles & Associados as its Registered Agent, using his attorney licenses, and family connections to the Brazilian judiciary, to continuously further transnational organized crimes, among other things, major intercontinental money laundering of moneys from corruption and tax frauds, systematically using bribing to corrupt powerful politicians and judges, using offshore shell companies and offshore banking structures set up to hide the ultimate beneficiaries receiving bribes and ill-gotten moneys, and artifices furthering coercion, intimidation, and extortion, and cover-ups for continued impunity.

COUNTS

Count 279 - 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 18 U.S.C. §371.

Count 280 - 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 281 - Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Alan Samuel Fine, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 282 - Thomas R. Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Romulo Pina Dantas, Olten Ayres de Abreu Jr., 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 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 18 U.S.C. §1346.

Count 283 – Thomas R. Lehman (“Lehman”) (trl@lklaw.com), [Patrick J. Rengstl](#) (“Rengstl”) (pjr@lklaw.com), Robin Barrera (at LKLS+G), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Alan Samuel Fine (“Fine”) (AFine@fine-law.com), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, conning, coercing, depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – *inter alia*, [certain E-mails](#), as an artifice to further the systematic scheme depriving and extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, in sham proceedings; **(283a)** on **January 31, 2011 at 11:55 a.m., from Fine to Lehman**, stating, to further the scheme: “*Subject: Tavares - Hi Tom [Lehman] Your assistant told me you are out of town today. Apparently Charles [Tavares] sent the Third-Party Complaint to my client [Romulo Pina Dantas] in Brazil by FedEx. I assume he did this without your knowledge. In any event, the time has come for him to get his own attorney. I have no problem with you continuing to represent the companies [Tavares’ Companies] provided you do not represent Tavares or act on any instructions from him that you, in your independent judgment, do not believe are in the best interest of the corporations [Tavares’ Companies]. We are tired of him using the corporations [Tavares’ Companies] for his personal purposes. Sincerely, Alan S. Fine*”; **(283b)** on **February 1, 2011 at 12:14 p.m., from Lehman to Tavares, cc: Rengstl, and Robin Barrera (LKLS+G)**, stating, to further the scheme: “*Subject: Tavares – Charles, See below from Alan Fine. He is pointing out the conflict of interest I have if I continue to represent both you, Individually, in the Bridgeloan litigation and the companies. I called him about it and he said that if you get individual counsel, Romulo [Romulo Pina Dantas] is interested in negotiating a final settlement between the two of you. Alan said he would not be involved in such negotiations but that Romulo had another, personal attorney to negotiate with your attorney. Have you confirmed [Kendall Coffey’s \[Kendall Coffey\]](#) law firm as your lawyer? If so, I can send him stipulation for substitution of counsel. Please call to discuss. Thomas R. Lehman, Partner [LKLS+G]*”; **(283c)** on **February 1, 2011 at 1:52 p.m., from Tavares to Lehman**, stating: “*Subject: Tavares – Tom [Lehman] Good afternoon and thank you for the information. I am glad that Alan [Fine] acknowledges that his client received the summon for the Third-Party Complaint and is fully aware of his obligations and responsibilities as to this legal issue. --- As for these people to say I may be using the corporations for my personal use it is not only garbage, but an insult. Just have his client step out of his skirts and pay his obligations as has more money than needed to do so as we will prove beyond any doubts. --- So therefore, I do ask you not to contact any of my personal attorneys. I will finalize my strategy and get back to you. Thank you and regards, Charles [Tavares]*”; **(283d)** on **February 1, 2011 at 2:34 p.m., from Lehman to Tavares, cc. Rengstl, and Robin Barrera**, stating, to further the scheme extorting Tavares: “*Subject: RE: Tavares Charles, I understand your strategy. Do you know when your new attorney will be appearing for you in the Bridgeloan case? I can wait for two weeks, until February 15, for your new attorney to appear. Otherwise, I have to file a motion to withdraw from the Bridgeloan case because of a conflict of interest. When you speak to your attorney, be sure to tell him that Judge Langer gave you one last extension, until May 20, to serve the*

summons and complaint for your case against Romulo or your suit against him would be dismissed. Thomas R. Lehman, P.A. Partner LKLS+G": (283e) on **February 1, 2011 at 2:44 p.m., from Lehman to Fine, c.c. Rengstl, and Robin Barrera**, stating, to further the scheme extorting client/victim Tavares: "Subject: Tavares – Alan [Fine], Athis confirms that your client [Romulo Pina Dantas] will not insist that I file a motion to withdraw as attorney for Defendants in the Bridgeloan case if successor counsel for Charles Tavares' third party claim files an appearance and substitutes for my firm on that claim in the case on or before February 15 [2011]. Thomas R. Lehman, P.A. Partner LKLS+G"; (283f) on **February 1, 2011 at 2:50 p.m., from Lehman to Tavares, cc: Rengstl**, stating, to further the scheme: "Subject: Tavares – Charles, I sent the below to Alan to confirm my conversation with him confirming that Romulo does not insists that I withdraw from the Bridgeloan case now but to do so in two weeks if new counsel is not substituted on the third part claim. Alan asked that I tell you that Romulo's lawyer from Brazil is coming to Miami next week and would like to meet with you and your new lawyer"; (283g) on **February 1, 2011 at 5:47 p.m., from Lehman to Fine, cc: Tavares and Rengstl**, stating, to further the scheme: "Subject: Bridgeloan – Alan, Charles would like to meet with Romulo's lawyer when the lawyer is in Miami next week. I consent to the lawyer meeting with Charles without me being present. Please have the lawyer contact Charles directly at 305-371-0707 to schedule a meeting next week. Thanks. Thomas R. Lehman, P.A. Partner LKLS+G": (283h) on **February 2, 2011 at 9:51 a.m., from Fine to Lehman, c.c. Tavares and Rengstl**, stating, to further the scheme: "Subject: Bridgeloan – Tom, If there is going to be a meeting, I will also be there. I also asked to speak to Charles' attorney before the Brazilian attorney arrives here. If Charles is not going to hire another attorney should I meet with him without you? Sincerely, Alan S. Fine"; (283i) on **February 2, 2011 at 11:45 a.m., from Lehman to Fine, c.c. Tavares and Rengstl**, stating, to further the scheme: "Subject: Bridgeloan – Alan , Charles prefers to meet Romulo's attorney without bringing his own attorney. The Miami attorney he is retaining is a litigation attorney who would appear in the Bridgeloan case for Charles. If business terms are reached at the meeting, Charles would have another, transactional attorney represent him. I had anticipated that Charels and the Brazilian lawyer would meet one on one and discuss settlement in Portuguese. Is it absolutely necessary that two of Romulo's attorneys be negotiating with Charles? It may not foster the best atmosphere for settlement. Thomas R. Lehman, PA Partner LKLS+G"; (283j) on **February 2, 2011 at 11:52 a.m., from Fine to Lehman**, stating, to further the scheme: "Subject: Bridgeloan – The Brazilian lawyer won't meet with Charles unless I'm there. Alan S. Fine"; (283k) on **February 3, 2011 at 4:17 p.m., from Lehman to Fine, c.c. Tavares and Robin Barrera**, stating, to further the scheme: "Subject: Bridgeloan – Alan, I think it's best if there be a meeting of Charles and Romulo because a meeting of Charles and Romulo's lawyers will not conclude in a deal but will be subject to Romulo's review and approval. If Romulo and Charles meet and reach a deal, it can be documented quickly. As agreed, until February 15, I am still Charles' attorney in the Bridgeloan case. As his attorney and on behalf of Charles, I agree if Romulo were to meet with Charles, (1) Charles would not use the meeting to serve Charles' third party complaint against Romulo on him and (2) Charles agrees that Romulo attending a settlement meeting with Charles would not be a basis for a Florida Court having personal jurisdiction over Romulo. Can a meeting be set up? Thomas R. Lehman, P.A. – Partner LKLS+G": (283l) on **February 3, 2011 at 4:22 p.m., from Fine to Lehman**, stating, to further the scheme: "Subject: Bridgeloan – Tom: Because of Charles' threats [purportedly to pursue enforcement of Dantas' contractual obligations to Tavares in other jurisdictions] Romulo has delegated his attorneys to finalize the situation. His Brazilian attorney has authority to make a deal. Sincerely, Alan S. Fine"; (283m) on **February 3, 2011 at 4:27 p.m., from Lehman to Tavares**, stating: "Subject: Bridgeloan – See below from Alan: he says Brazilian attorney is

coming with settlement authority. Thomas R. Lehman, P.A. – Partner LKLS+G.” At all relevant times, Lehman, Rengstl, Robin Barrera, LKLS+G, and others implicated, all know in truth and in fact that, they are intentionally falsely and fraudulently representing client/victim Tavares in a known and fatal conflict of interest, to covertly con, coerce, trick, deprive, steal and extort Tavares of properties and rights, and that, Fine – [a Tavares’ former attorney](#), is an Associate of BRIDGELOAN’s Criminal Enterprise, falsely and fraudulently representing Tavares’ investor Dantas, covertly, without filing a notice of appearance, in a known and intentional fatal conflict of interest to further the scheme extorting Tavares, and that their sham emails are an artifice to further the scheme after not being able to coerce and extort Tavares to sign a Sham Settlement with Dantas, after learning Tavares is negotiating to possibly sell one of Tavares’ Properties to pay off the sham loan, keeping the second property free and clear, to partially escape BRIDGELOAN’s second grand scheme – after BRIDGELOAN’s first Grand Scheme, the Brickell Premier scheme, to extort Tavares of properties. Lehman, Rengstl, Barrera, LKLS+G, Fine, and Dantas’ willful actions using E-mail to further the scheme, is in violation of 18 U.S.C. §1343.

Count 284 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 285 - Thomas R. Lehman, Robin Barrera, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco E. Rojas, Alan S. Fine, Romulo Pina Dantas, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, systematically conning, coercing and extorting Tavares to accept a fraudulent settlement 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 286 –Thomas Ralph Lehman, Patrick J. Rengstl, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at [www.floridabar.org](#).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
287	From February 8, through February 17, 2011 and Continuing	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Robin Barrera LKLS+G, LLP The Continued Criminal Enterprise
288		§ 241 Conspiracy Against Rights &	
289		§ 242 Deprivation Rights Under Color of Law &	
290		§ 1346 Scheme/Artifice to Defraud &	
291		§ 1343 Wire Fraud &	
292		§ 1961 <i>et seq.</i> – RICO &	
293		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
294		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

From February 8, through February 17, 2011, and continuing, Charles Tavares’s (“Tavares”) personal and corporate attorneys, [Thomas R. Lehman](#) (“Lehman”), [Patrick J. Rengstl](#), Robin Barrera, and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), covertly and fraudulently representing, in continued fatal conflict of interest, client/victim Tavares, and Tavares’ Companies Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”), to extort Tavares’ Properties in sham proceedings in the sham *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, continuing artifices to con, coerce, and extort client/victim Tavares, stay in the conflicted representation of Tavares’ Companies BV One, 2147, and MRPM to further the scheme by BRIDGELOAN’s Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”) extorting Tavares of two Collateral Properties securing a Sham \$12 million dollars Loan by BRIDGELOAN and its enabler Mellon United National Bank, N.A. a.k.a. MUNB Loan holdings, LLC n.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), the Brickell Buildings, and the 9 Acres Miami River Marina Property, with a combined value of over \$50 million dollars. Lehman, still representing Tavares’ individually, to further the scheme, instructs Tavares’ new personal attorneys [Larry Stumpf](#) (“Stumpf”) and [Black Srebnick Kornspan & Stumpf, P.A.](#)¹²¹ (“Black Srebnick”), falsely stating on an E-mail of February 11, 2011 at 1:29 p.m., “Larry, The third party claim is what you’d be coming in the case for Charles on. Thomas R. Lehman,” so Lehman, and Alan S. Fine, covertly and fraudulently representing, in conflict of

¹²¹ Lehman, on an E-mail of February 8, 2011 at 3:22 p.m., upon learning Tavares’ hired co-counsel, *inter alia*, Stumpf, states: “I now [sic] Larry. He’s good. He was a partner of my current partners, Larry Kellogg and David Levine. The Chapter 11 is better available if we have contracts on the properties, preferably not subject to financing. Thomas R. Lehman.” On February 9, 2011 at 11:28 a.m., Tavares’ personal and corporate attorneys Lehman and LKLS+G, after requesting, receive from Tavares’ former co-counsels at [Homer & Bonner](#), an E-mail with copies of Tavares’ Amended Answer, Counter Claim, and Third-Party Complaint filed on behalf of Tavares in the BRIDGELOAN Case in July 2010, showing, among other things, that, Tavares’ personal and corporate attorneys Lehman and LKLS+G are solely working to con, deprive and extort Tavares of properties, under color of law.

interest, Tavares' investor and Third-Party Defendant [Romulo P. Dantas](#) ("Dantas"), together and jointly with Dantas' [Brazilian/ Swiss](#) fixer [Olten Ayres de Abreu Jr.](#) ("Abreu Jr."), BRIDGELOAN and BNY Mellon, can continue furthering the scheme extorting Tavares, under color of law, of Tavares' Properties.

COUNTS

Count 287 - 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 18 U.S.C. §371.

Count 288 - 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 289 - Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 290 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 291 – Thomas R. Lehman ("Lehman") and Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, conning, coercing, depriving, stealing and extorting client/victim Charles Tavares ("Tavares") of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – *inter alia*, a certain [E-mail](#), in response to Tavares' personal and corporate attorneys Lehman and LKLS+G's request to Tavares' former co-counsels at Homer & Bonner for certain Tavares' filed pleadings, among others, Tavares' Amended Answer, Counterclaim, and Third party Complaint, showing that, at all relevant times, Lehman and LKLS+G are falsely and fraudulently representing Tavares in the BRIDGELOAN Case, covertly furthering the scheme: **(291a)** on **February 9, 2011 at 11:28 a.m., from Cary Lopez** (CLopez@homerbonner.com) **to Lehman** (trl@lklaw.com), stating, "*Dear Mr. Lehman, Attached please find the Amended Answer, CC [Counterclaim] and Third Party Complaint we filed in the above matter;*" and, a certain [E-mail](#) falsely instructing Tavares' co-counsels at Black Srebnick to further the scheme: **(291b)** on **February 11, 2011 at 1:29 p.m., from Lehman** (trl@lklaw.com) **to Larry Stumpf** (lstumpf@royblack.com), **c.c. Tavares** (ctavares@bellsouth.net), falsely states: "*Larry, The third party complaint is what you'd be coming in the case for Charles on. Thomas R. Lehman – Partner LKLS+G,*" in violation of 18 U.S.C. §1343.

Count 292 - At all times relevant, Thomas R. Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 293 - Thomas Ralph Lehman, Parick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, systematically conning, coercing and extorting Tavares to accept a fraudulent settlement 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 294 –Thomas Ralph Lehman, Patrick J. Rengstl, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
295	February 11, 2011	U. S. CODE TITLE 18	Olten Ayres de Abreu Junior Romulo Pina Dantas Marcos Jose Bezerra Menezes Alan Samuel Fine Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP The Continued Criminal Enterprise
296		§ 371 Conspiracy to Defraud the USA &	
297		§ 241 Conspiracy Against Rights &	
298		§ 242 Deprivation Rights Under Color of Law &	
299		§ 1346 Scheme/Artifice to Defraud &	
300		§ 1952–Interstate Travel in-aid-of Racketeering &	
301		§ 1951 Extortion (Hobbs Act) &	
302		§ 1961 <i>et seq.</i> – RICO &	
		Florida Bar Rules of Professional Conduct	
		Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On February 11, 2011, [Brazilian/Swiss](#) attorney, fixer, and “*Money Bag Man*”, [Olten Ayres de Abreu Jr.](#) (“Abreu Jr.”) is sent to Miami, Florida, by Tavares’ investor and Third-Party Defendant [Romulo Pina Dantas](#) (“Dantas”), and [Marcos Jose Bezerra Menezes](#) (“Menezes”), to further a scheme extorting Charles Tavares (“Charles Tavares”) of properties and rights, under color of law, in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings LLC*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud. The record shows,¹²² *inter alia*, Dantas, Menezes, and sham¹²³ lender BRIDGELOAN stroke a side deal to extort Tavares of Tavares’ two Properties valued over \$50 million dollars securing the sham \$12 million dollars loan, caused into default by BRIDGELOAN’s systematic torts and interference. After months of trying to con, coerce and extort Tavares to sign a sham settlement with Dantas, the CCE changes artifices by requiring Tavares to hire a new co-counsel to represent Tavares personally in the Third-Party claims against Dantas, while keeping Lehman and LKLS+G continuing to covertly fraudulently represent Tavares’ Companies Defendants Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”) and Miami River Park Marina, Inc. (“MRPM”). Abreu Jr. travels to Miami,

¹²² In August 2013, Tavares obtained emails upon discovery in the Related Case, *Charles Tavares, Brickell Village One, LLC, and 2147 SW 8 Street, LLC v. Thomas R. Lehman and Levine Kellogg Lehman + Scheider +Grossman, LLP*, Case No. 2013-12223-CA-40, showing abundant evidence of a conspiracy to coerce, deprive, and extort Tavares of properties and rights in sham proceedings, by Thomas R. Lehman (“Lehman”), Alan S. Fine (“Fine”), Abreu Jr., Tavares’ corrupted co-counsels Black Srebnick Kornspan & Stumpf (“BSK&S” or “Black Srebnick”), BRIDGELOAN, Hall Lamb and Hall, BNY Mellon, and attorneys Katz Barron Faust Squitero, *et al.*, and, showing among other things, that, Tavares’ personal and corporate attorneys Lehman and LKLS+G, and personal co-counsel Black Srebnick, at all relevant times, are falsely and fraudulently representing client/victim Tavares, systematically conning, intimidating, coercing, and extorting Tavares of Tavares’ properties and rights, furthering BRIDGELOAN’s successful scheme depriving and extorting Tavares of properties and rights upon the sham proceedings. See Record.

¹²³ Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), enabler & facilitator of BRIDGELOAN.

Florida, to further the scheme, in aid-of-racketeering, repeatedly coercing, intimidating, and [making threats to Tavares and Tavares' family](#), to extort Tavares of properties and rights, corrupting and bribing officers of the courts in the BRIDGELoAN Case, among others, [Lehman](#), [Rengstl](#), [LKLs+G](#), [Fine](#), Alan S. Fine, P.A., [Marco Emilio Rojas](#), [R&S International Law](#), [Larry A. Stumpf](#), [Jared M. Lopez](#), [Black Srebnick Kornspan & Stumpf, P.A.](#) ("Black Srebnick" or "BSK&S"), and systematically depriving the United States of America, and the State of Florida, of honest services upon a court of law.

COUNTS

Count 295 - 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 18 U.S.C. §371.

Count 296 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 297 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 298 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 299 – Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney and a fixer for Romulo P. Dantas and Marcos Menezes, did knowingly and intentionally, as part of a scheme depriving, coercing, and extorting U.S. citizen Charles Tavares, travel in-aid-of racketeering to Miami, FL, on February 11, 2011, to, among other things, coerce, intimidate, extort, and bribe, among others, officers of the court, in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, and to coerce, [physically threat](#), steal, and extort Tavares of properties and rights in violation of 18 U.S.C. §1952 (Interstate Travel in-aid-of Racketeering).

Count 300 – Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a "Money Bag Man", for Romulo P. Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P.*

Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp., Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [made threats to Tavares and Tavares' family](#) to coerce, intimidate, deprive, and extort Tavares of properties and rights, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 301 - At all times relevant, Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Menezes, Thomas R. Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Erica L. English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or BSK&S"), 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, 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 302 –Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Scheider +Grossman, LLP ("LKLS+G, LLP"), Marco Emilio Rojas, R&S International Law, Alan Samuel Fine, Alan S. Fine, P.A., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A., and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, under color of law, and depriving the United States of America and the State of Florida of honest services upon a court of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
303	March 1, 2011	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Robin Barrera LKLS+G, LLP The Continued Criminal Enterprise
304		§ 241 Conspiracy Against Rights &	
305		§ 242 Deprivation Rights Under Color of Law &	
306		§ 1346 Scheme/Artifice to Defraud &	
307		§ 1343 Wire Fraud &	
308		§ 1961 <i>et seq.</i> – RICO &	
309		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
310		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On March 1, 2011, Charles Tavares’ (“Tavares”) personal¹²⁴ and corporate attorneys, [Thomas R. Lehman](#) (“Lehman”), [Patrick J. Rengstl](#), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), covertly and fraudulently representing, in continued fatal conflict of interest, client/victim Tavares, and Tavares’ Companies Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”), to extort Tavares’ Properties in sham proceedings in the sham *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, continuing artifices to con, coerce, and extort client/victim Tavares, stay in the conflicted representation of Tavares’ Companies BV One, 2147, and MRPM to further the scheme by BRIDGELOAN’s Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”) extorting Tavares of two Collateral Properties securing a Sham \$12 million dollars Loan by BRIDGELOAN and its enabler Mellon United National Bank, N.A. a.k.a. MUNB Loan holdings, LLC n.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), the Brickell Buildings, and the 9 Acres Miami River Marina Property, with a combined value of over \$50 million dollars, transmits, to further the scheme, an E-mail with LKLS+G’s bill for legal fees for Tavares, Tavares’ Companies BV One, 2147, and MRPM. At all relevant times, the record obtained upon discovery on the Related Case *Charles Tavares, Brickell Village One, LLC and 2147 SW 8 Street, LLC v. Thomas R. Lehman and Levine Kellogg Lehman Schneider + Grossman, LLP*, Case No. 2013-12223-CA-40, shows that Lehman and LKLS+G were, *inter alia*, conspiring to further the extortion of Tavares’ Properties and rights, knowingly and intentionally, falsely representing Tavares in a willful conflict of interest to defraud, systematically failing to prepare for trial, failing to obey orders from client/victim Tavares to file for Bankruptcy Protection to allow Tavares and Tavares’ Companies to, in an orderly and proper fashion, sell one of the properties to pay off BRIDGELOAN’s Sham Loan, while preserving the second property.

¹²⁴ Lehman and LKLS+G, withdraw on February 18, 2011 from individually representing Tavares, while willfully going on to continue representing Tavares’ Companies Defendants in known conflict, is an artifice to continue coercing and extorting Tavares of properties and rights, under color of law, after years of the known conflict of interest against client Tavares.

COUNTS

Count 303 - 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 18 U.S.C. §371.

Count 304 - 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 305 - Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 306 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 307 – Thomas R. Lehman (“Lehman”), Patrick J. Rengstl, Robin Barrera, and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, conning, coercing, depriving, stealing and extorting client/victim Charles Tavares (“Tavares”) of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – *inter alia*, a certain E-Mail, an U.S Postal Mail, with a [Bill #1550](#), for the [false, invalid, and fraudulent representation](#) for the month of February 2011, falsely and fraudulently charging Tavares the amount of \$17,073.84, from LKLS+G to Tavares’ Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (LKLS+G’s Client Code #70913). At all relevant times, Lehman and LKLS+G are falsely and fraudulently representing Tavares in the BRIDGELOAN Case, covertly furthering the scheme to covertly con, coerce, deprive, steal, and extort Tavares’ properties and rights, under color of law: **(307a) on March 1, 2011 , from LKLS+ to Tavares** (ctavares@bellsouth.net), at 444 Brickell Avenue, Suite 415, Miami, Florida 33131, for fraudulent legal services in the BRIDGELOAN case, in violation of 18 U.S.C. §1343.

Count 308 - At all times relevant, Thomas R. Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 309 - Thomas Ralph Lehman, Parick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, systematically conning, coercing and extorting Tavares to accept a fraudulent settlement 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 310 –Thomas Ralph Lehman, Patrick J. Rengstl, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
311	March 6, 2011 at 12:28 P.M.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Robin Barrera
312		§ 241 Conspiracy Against Rights &	LKLS+G, LLP Larry A. Stumpf
313		§ 242 Deprivation Rights Under Color of Law &	Jared M. Lopez Black Srebnick Kornspan & Stumpf
314		§ 1346 Scheme/Artifice to Defraud &	Alan Samuel Fine Marco Emilio Rojas
315		§ 1343 Wire Fraud &	Matthew Paul Leto Andrew Clifford Hall
316		§ 1961 <i>et seq.</i> – RICO &	Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. Erica Lee English
317		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	Harold Eugene Lindsey III Katz Barron Faust Squitero
318		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d) &	The Bank of New York Mellon Allan Lester Langer Miami Courts
319		FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	The Continued Criminal Enterprise

On March 6, 2011, at 12:28 p.m., Thomas R. Lehman (“Lehman”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), falsely and fraudulently representing client/victim Charles Tavares (“Tavares”), and Tavares’ Companies, covertly working for years, together with other Perpetrators, among others, Marco E. Rojas (“Rojas”), and Alan Samuel Fine (“Fine”), to further a scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”) to deprive and extort Tavares of two collateral properties, valued over \$50 million dollars, securing a Sham \$12 Million dollars loan, to further the scheme, submits an [email](#) to Tavares, stating among other things, relating to the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Tavares of properties and rights, under color of law: *“The Judge in the Bridgeloan lawsuit will hold the trial of the case sometime during the three weeks that begin April 4. On March 30, the Judge will have a hearing to determine which day during the three weeks the trial will occur. The Judge will not delay the trial because my firm has withdrawn as lawyer for the companies. If the companies do not retain another lawyer to represent them, the Judge will enter a default against the companies and award a judgment to Bridgeloan without a trial.”* Lehman, Rengstl, LKLS+G, and other Perpetrators, all knew that the BRIDGELoAN Case is a legal farce, vitiated by fraud upon the court by officers of the court, furthering a brazen scheme successfully coercing, intimidating, depriving, and extorting U.S. citizen Tavares of properties and rights, under color of law, and that the sham BRIDGELoAN Case was never a legal contest. See BRIDGELoAN Case [Docket](#).

COUNTS

Count 311 - 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 18 U.S.C. §371.

Count 312 - 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 313 - Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 314 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 315 – Thomas R. Lehman (“Lehman”), Robin Barrera, and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), falsely and fraudulently representing Charles Tavares (“Tavares”) and Tavares’ Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River park Marina, Inc., and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, conning, coercing, depriving, stealing and extorting client/victim Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – *inter alia*, a certain [E-Mail](#), covertly furthering the scheme to covertly con, coerce, deprive, steal, and extort Tavares’ properties and rights, under color of law: **(315a)** on **March 6, 2011, at 12:28 p.m., from Lehman** (trl@lklaw.com), **and LKLS+G to Tavares** (ctavares@bellsouth.net), in violation of 18 U.S.C. §1343.

Count 316 - At all times relevant, The Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.,* Record and [Tavares Sworn Affidavit](#).

Count 317 - The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, systematically conning, coercing and extorting Tavares to accept a fraudulent settlement 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 client/victim Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 318 –Thomas Ralph Lehman, Patrick J. Rengstl, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org

Count 319 – Judge Allan Lester Langer, 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

320	March 14, 2011 at 4:38 P.M.	<u>U. S. CODE TITLE 18</u>	Matthew Paul Leto Andrew Clifford Hall Hall, Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Nelson Slosbergas Bridgeloan Investors, Inc. Manuel Vidal Dennis Joyce Patrice Robinson The Bank of New York Mellon The Continued Criminal Enterprise
321		§ 371 Conspiracy to Defraud the USA &	
322		§ 241 Conspiracy Against Rights &	
323		§ 242 Deprivation Rights Under Color of Law &	
324		§ 1346 Scheme/Artifice to Defraud &	
325		§ 1341 Mail Fraud &	
326		§ 1344 Bank Fraud &	
327		§ 1961 <i>et seq.</i> – RICO &	
328		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On March 14, 2011, Matthew P. Leto (“Leto”), Andrew C. Hall, and Hall, Lamb and Hall, P.A., attorneys for Plaintiff Bridgeloan Investors, Inc. (“BRIDGELOAN”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, [file](#), with unclean hands, BRIDGELOAN’s Notice of Filing, *inter alia*, a Second patently **fraudulent Affidavit of Joseph Horn** (“Horn”) (“[Horn’s Second Fraudulent Affidavit](#)”). Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Mellon to money launder and tax defraud the ill-gotten proceeds. Among other patently fraudulent and contradictory statements to the Miami Courts, showing the CCE’s **Omertà Code**,¹²⁵ Horn, knowingly and intentionally falsely states: “On or about July 21, 2007, Bridgeloan Investors, Inc. (‘BRIDGELOAN’), authorized a loan to Defendants, Miami River Park Marina, Inc. (‘Miami River’) Brickell Village One, LLC (‘Brickell’), and 2147 SW 8 Street, LLC (‘2147 SW 8 Street’), in the original principal amount of Seven Million Dollars (\$7,000,000.00) (the “Loan”) for use in connection with a plan to develop certain real estate in Miami...”, see ¶ 2; And, “On July 2, 2007 and pursuant to a Future Advance of \$5,000,000.00, the total principal amount of the loan owed by Miami River, Brickell, and 2147 SW 8 Street increased to \$12,000,000.00,” see ¶ 4. These statements are false and contradictory,

¹²⁵ The CCE’s **Omertà Code** shows Leto, Hall Lamb, Horn, BRIDGELOAN, and BNY Mellon, willfully showing their commitment to the scheme extorting Tavares of properties and rights by filing Horn’s Second Fraudulent Affidavit, and [BNY Mellon’s Affidavits](#).

intentionally and knowingly showing the CCE's Omertà Code by Leto, Hall & Lamb, and BRIDGELOAN, and Manuel Vidal, together with Affidavits of BNY Mellon's Patrice Robinson ("Patrice Robinson"), and Dennis Joyce ("Dennis Joyce"). Horn, further brazenly displaying **Omertà Code** to other Associates of the CCE, and observers – *inter alia*, Tavares' new co-counsels at Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or "BKS&S"), knowingly and intentionally, fraudulently inflates¹²⁶ the default interest charged to borrower/victim Tavares to \$4,494,667.00, fraudulently charging Tavares for, among other things, "unpaid interest" from February 2009 through September 2009, when in truth and in fact, Tavares paid the \$120,000 monthly interest from February to September 2009,¹²⁷ and Horn knows Tavares paid and Horn received these payments. Horn's Second Fraudulent Affidavit, brazenly displays to other Associates, and observers, that Horn is totally committed to the brazen criminal scheme. Horn's Second Fraudulent Affidavit, follows Horn's First fraudulent Affidavit, also willfully filed, with unclean hands, by Hall & Lamb, on November 24, 2010, and notarized by BRIDGELOAN's employee and Notary Public Renata Carvalho Bertrand ("Renata Bertrand") with a false date of "November 23, 2009", to demonstrate that they all know Horn's First Affidavit is facially and factually fraudulent, and it is part of the CCE's **Omertà Code**, providing *insurance policy* to Associates that Horn, BRIDGELOAN's CCE Boss, is fully committed to the criminal scheme. At all relevant times, all the Perpetrators implicated know that Horn's Second Fraudulent Affidavit – and Horn's First Fraudulent Affidavit, are facially and patently fraudulent, and it is used as an artifice to defraud and extort borrower/victim Tavares of properties and rights upon sham proceedings vitiated by frauds, and to further defraud the United States of America of honest services upon courts of law in the United States of America, and due taxable income.

¹²⁶ In addition to displaying **Omertà Code** to the CCE's Associates, and observers, showing that Horn, and other implicated Associates are fully committed to the brazen criminal scheme systematically extorting Tavares upon subverted proceedings in a court of law in the United States of America, Horn's Second Fraudulent Affidavit inflated claims of \$16,534,248.15, including \$4,494,667.00 in fraudulent default interest from Tavares' loans, shows how the CCE feeds BRIDGELOAN, and affiliated entities and Associates, among others, Horn Eichenwald Investments, Inc., a Florida corp., h2acapital Corp., a Florida Corp. f.k.a. Bridgeloan Partners, Corp. a Florida corp. (Tax Id. #86-3280908), Dartley Securities Limited (Bahamas) and Dartley Bank & Trust Limited (Bahamas), BRIDGEINVEST, LLC, BRIDGEINVEST Fund GP, LLC, a Delaware corp., BRIDGEINVEST Fund GP II, LLC, a Delaware corp., BRIDGEINVEST Fund GP III, LLC, a Delaware corp., and counterparts, among others, BANIF Securities, Inc., Cayman Islands ("BANIF"), and other BANIF affiliated entities hijacked by the CCE ("collectively, "BANIF"), and Integra Solutions, LLC, a Florida L.L.C. ("INTEGRA") with millions of dollars in fraudulent claims and deductions of mortgage/loan/portfolio tax-free bonds interest, further defrauding the United States of millions of dollars of taxable income, allowing Associates of the CCE, e.g., Joseph Horn, Alex Horn, Nelson Slosbergas, Rojas, et al., to live in The Gables Estates and Key Biscayne, enjoying the security and comfort of the United States, provided by hard-working tax-paying Americans that they systematically steal from to improperly feed their lavishly lifestyle.

¹²⁷ In October 2009, Tavares stops paying BRIDGELOAN & BNY Mellon's sham loan because of BRIDGELOAN's systematic and repeated torts successfully causing the loan into default, by among other things, systematically coercing and extorting Tavares' attorneys to sabotage and undermine numerous deals Tavares successfully negotiated to sell one of the two properties, and/or joint-venture, systematically coercing and extorting Tavares' investor Romulo Pina Dantas ("Dantas") not to fulfill its contractual obligations with Tavares to continue funding the interest payments, and other longtime Tavares' investors and partners, while BRIDGELOAN fraudulently misleads Tavares to believe that BRIDGELOAN and BNY Mellon's loan have been extended to May 2010 by agreeing to Tavares continuing to pay, and BRIDGELOAN continuing to receive, the \$120,000 monthly loan extension interest, while BRIDGELOAN, *et al*, fabricating sham offers and appraisals to devalue Tavares' two collateral properties valued over \$50 million dollars, securing the sham \$12 million loan, willfully, continuously, and systematically perpetrate torts against Tavares and Tavares' Companies to further the scheme, and, filing, on December 24, 2009, a sham lawsuit showing fraudulent and contradictory claims against Tavares, supported by patently and fraudulent Affidavits of BRIDGELOAN's Horn, to successfully deprive, steal, and extort Tavares of properties and rights, under color of law, in sham proceedings in a court of law in the United States of America, subverted by BRIDGELOAN's CCE, in the sham BRIDGELOAN Case.

COUNTS

Count 320 - 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 18 U.S.C. §371.

Count 321 - 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 322 - Matthew P. Leto, Andrew C. Hall, Hall, Lamb and Hall, P.A., Joseph Horn, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 323 - Matthew P. Leto, Andrew C. Hall, Hall, Lamb and Hall, P.A., Joseph Horn, Bridgeloan Investors, Inc., BNY Mellon, 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 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 18 U.S.C. §1346.

Count 324 – Matthew P. Leto, Andrew C. Hall, Hall, Lamb and Hall, P.A., Joseph Horn (“Horn”), Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail dated March 11, 2011, to wit – a certain U.S. Postal Mail with a Notice of Filing, containing, *inter alia*, Horn’s Second Fraudulent Affidavit, on behalf of Bridgeloan Investors, Inc., to further a scheme upon the courts extorting Charles Tavares of properties and rights. Horn’s Second Fraudulent Affidavit: **324(a)** to: “Patrick J. Rengstl, Esq., Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131”; **324(b)** to: “Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon Boulevard, Coral Gables, FL 33134”; **324(c)** to: “Erica English, Esq., Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, Florida 33133”; and, **324(d)** to: “Larry Stumpf, Esq., Black Srebnick Kornspan Stumpf, 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131.” “Certificate of Service – We Hereby Certify that a true and correct copy of the foregoing was served via e-mail and via U.S. Mail on this 11th day of March, 2011. By: /s/ Mathew Paul Leto, in violation of, 18, U.S.C., § 1341.

Count 325 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Joseph Horn, Bridgeloan Investors, Inc., BNY Mellon, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. (“BNY Mellon”) (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares (“Tavares”) of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares’s Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon’s Shareholders, in violation of, 18 U.S.C. §1344.

Count 326 - At all times relevant, the Perpetrators, as well as other unnamed implicated Associates, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Miami-Dade County, Florida, and elsewhere. The Perpetrators, and others, known and unknown, constituted a criminal organization whose members and associates, as part of the conspiracy, that each criminal associate agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise, and engaged in various related criminal activities, including but not limited to false statements and writings, forgery, filing false documents, influencing witnesses, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 327 - Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Joseph Horn, Bridgeloan Investors, Inc., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices): **327(a)** - Perjury in Official Proceeding by Joseph Horn and Bridgeloan Investors, Inc., a Florida corp., and other Perpetrators implicated, to further the scheme by knowingly and intentionally, falsely stating to deprive Tavares of properties and rights, that: “*On or about July 21, 2007, Bridgeloan Investors, Inc. (‘BRIDGELoAN’), authorized a loan to Defendants, Miami River Park Marina, Inc. (‘Miami River’) Brickell Village One, LLC (‘Brickell’), and 2147 SW 8 Street, LLC (‘2147 SW 8 Street’), in the original principal amount of Seven Million Dollars (\$7,000,000.00) (the ‘Loan’) for use in connection with a plan to develop certain real estate in Miami...*”, see Horn’s Second Fraudulent Affidavit at ¶ 2, in violation of, §837.02, F.S. (Perjury in Official Proceeding); **327(b)** - Perjury in Official Proceeding by Joseph Horn and Bridgeloan Investors, Inc., a Florida corp., and other Perpetrators implicated, to further the scheme by knowingly and intentionally, falsely stating to deprive Tavares of properties and rights, that: “*On July 2, 2007 and pursuant to a Future Advance of \$5,000,000.00, the total principal amount of the loan owed by Miami River, Brickell, and 2147 SW 8 Street increased to \$12,000,000.00,*” see Horn’s Second Fraudulent Affidavit at ¶ 4, in violation of, §837.02, F.S. (Perjury in Official Proceeding); **327(c)** - Perjury in Official Proceeding by Joseph Horn and Bridgeloan Investors, Inc., a Florida corp., and other Perpetrators implicated, to further the scheme by knowingly and

intentionally, falsely stating to deprive Tavares of properties and rights, that: the “*Default interest calculated from February 28, 2009 through February 28, 2011 is \$4,494,667.00*”, see Horn’s Second Fraudulent Affidavit at ¶ 7, in violation of, §837.02, F.S. (Perjury in Official Proceeding); and, **327(d)** - Perjury in Official Proceeding by Joseph Horn and Bridgeloan Investors, Inc., a Florida corp., and other Perpetrators implicated, to further the scheme by knowingly and intentionally, falsely stating to deprive Tavares of properties and rights, that: “*TOTAL AMOUNT DUE UNDER NOTE: \$16,534,248.15*”, see Horn’s Second Fraudulent Affidavit at ¶ 7, in violation of, §837.02, F.S. (Perjury in Official Proceeding).

Count 328 – Matthew P. Leto, Andrew C. Hall, Hall & Lamb, Nelson Slosbergas, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
329	March 21, 2011 From 11:18 p.m. Through 1:30 p.m.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Olten Ayres de Abreu Junior Thomas Ralph Lehman Patricj k. Rengstl LKLS+G, LLP Larry A. Stumpf Black Srebnick Kornspan & Stumpf Romulo Pina Dantas Marcos Jose Bezerra Menezes The Continued Criminal Enterprise
330		§ 241 Conspiracy Against Rights &	
331		§ 242 Deprivation Rights Under Color of Law &	
332		§ 1346 Scheme/Artifice to Defraud &	
333		§ 1343 Wire Fraud &	
334		§ 1961 <i>et seq.</i> – RICO &	
335		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
336	Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)		

On March 21, 2011, Charles Tavares' ("Tavares"), and Tavares' Companies' Brickell Village One, LLC ("BV One"), 2147 SW 8 Street, LLC ("2147"), and Miami River Park Marina, Inc.'s ("MRPM") attorneys, among others, Thomas R. Lehman ("Lehman"), Patrick J. Rengstl ("Rengstl"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry A. Stumpf ("Stumpf"), and Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or "BSK&S"), furthering an ongoing scheme extorting client/victim Tavares of properties and rights in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Courts"), vitiated by fraud, exchange [E-mails](#), conspiring, and devising an artifice to deprive, steal and extort Tavares of properties and rights in an upcoming Sham¹²⁸ Mediation ("Sham Mediation") of March 29, 2011, together with Olten Ayres de Abreu Junior ("Abreu Jr."), a Swiss/Brazilian attorney, fixer, and "money bag man" for Third-Party Defendant Romulo Pina Dantas ("Dantas"), and Marcos Jose Bezerra Menezes ("Menezes"). The Record¹²⁹ shows a chain of emails by the Perpetrators, on March 21, 2011, setting up a conference call at 1:30 p.m. to coordinate the scheme to deprive and extort Tavares in the Sham Mediation. At all relevant times, Abreu Jr., Lehman, Rengstl, LKLS+G, Stumpf, and Black Srebnick, knowingly and intentionally, conspire to deprive and extort Tavares of properties and rights.

¹²⁸ The Sham Mediation of March 29, 2011, is set up by the Perpetrators to be held at BRIDGELoAN's attorneys' offices, Hall Lamb and Hall, P.A. ("Hall & Lamb"), mediated by sham mediator [Norman Stuart Gerstein](#) ("Sham Mediator Gerstein"), [based at the same offices of Hall & Lamb](#) at 2665 South Bayshore Drive, Penthouse One, Miami, Florida 33133, to coerce, intimidate, and extort Tavares to surrender Tavares' two collateral properties – valued over \$50 million dollars, securing a sham \$12 million dollars loan by sham lender Bridgeloan Investors, Inc. ("BRIDGELoAN"), an entity used by Joseph Horn's ("Horn") Transnational Continued Criminal Enterprise ("CCE" or "Criminal Enterprise"), together with enabler and co-lender Mellon United National Bank, N.K.A. a.k.a. MUND Loan Holdings, LLC a.k.a. The Bank of New York Mellon ("BNY Mellon").

¹²⁹ Record obtained in August 2013, through discovery, in the Related Case *Charles Tavares, Brickell Village One, LLC and 2147 SW 8 Street, LLC v. Thomas R. Lehman & LKLS+G*, Case No. 2013-12223-CA-40, showing the conspiracy to extort victim Tavares.

COUNTS

Count 329 - 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 18 U.S.C. §371.

Count 330 - 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 331 - Olten Ayres de Abreu Junior, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry Allen Stumpf, Black Srebnick Kornspan & Stumpf, P.A., and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 332 - Olten Ayres de Abreu Junior, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry Allen Stumpf, Black Srebnick Kornspan & Stumpf, P.A., 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 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 18 U.S.C. §1346.

Count 333 – Olten Ayres de Abreu Junior (“Abreu Jr.”) (oabreu@fbt.ch), Thomas Ralph Lehman (“Lehman”) (trl@lkllaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf (“Stumpf”) (LStumpf@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, [E-mails](#), dated March 21, 2011, to wit – *inter alia*, certain E-mails conspiring and coordinating artifices to further a scheme upon the courts extorting Charles Tavares of properties and rights: **333(a) at 11:18 a.m., From Abreu Jr. to Stumpf and cc Lehman**, “Subject: Bridgeloan Litigation 1:30 pm today for me is fine, what about Tom [Lehman]?”; **333(b) at 11:26 a.m., From Lehman to Abreu Jr. and Stumpf, cc Rengstl**, “Subject: TR : Bridgeloan Litigation 1:30 today is good for me. Thomas R. Lehman”; **333(c) at 11:31 a.m., From Stumpf to Abreu Jr. and Lehman, cc Rengstl**, “Subject: TR : Bridgeloan Is good for me – you can call my office, ask for ‘*95’ 9our confreerence call line) if that works ... Thanks Larry A. Stumpf”; **333(d) at 11:36 a.m., From Lehman to Stumpf and Abreu Jr., cc Rengstl**, “Subject: TR : Bridgeloan Litigation Will you be calling me? Thomas R. Lehman”; **333(e) at 11:36 a.m., From Diana Morrison (DMorrison@royblack.com) to Abreu Jr., Lehman, and Stumpf, cc Rengstl**, “Subject: TR : Bridgeloan Litigation GENTLEMEN: PLEASE ASK FOR*96 WHEN YOU CALL IN AT 1:30 P.M. TODAY”;

333(f) at 11:37 a.m., From Lehman to Diana Morrison, Abreu Jr., Stumpf, cc Rengstl, “Subject: TR : Bridgeloan Litigation Attachments: image001.gif Understood. Thomas R. Lehman”; **333(g) at 11:40 a.m., From Abreu Jr. to Lehman and Stumpf, cc Rengstl,** “Subject: TR : Bridgeloan Litigation As in a mobile pls connect me in the call (+55 11 99817171) Tnks.”; **333(h) at 12:00 p.m., From Abreu Jr. to Lehman, Diana Morrison and Stumpf, cc Rengstl,** “Subject: TR : Bridgeloan Litigation Pls call my mobile +55 11 99817171”; and, **333(i) at 12:27 p.m., From Stumpf to Lehman,** “Subject: TR : Bridgeloan Litigation Tom [Lehman] --- I’ll call you and you can ‘patch in’ Olten – call me if you to chat before the call ... thanks Larry A. Stumpf”. At all times relevant, Abreu Jr., Lehman, Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Stumpf, and Black Srebnick Kornspan & Stumpf, P.A. are conspiring to further a scheme depriving and extorting client/victim Charles Tavares of properties and rights upon subverted proceedings in the sham BRIDGELoAN Case, in violation of, 18, U.S.C., § 1343.

Count 334 - At all times relevant, Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Jose Bezerra Menezes, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry Allen Stumpf, Black Srebnick Kornspan & Stumpf, P.A., 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 335 - Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Jose Bezerra Menezes, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry Allen Stumpf, Black Srebnick Kornspan & Stumpf, P.A., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices):

Count 336 – Thomas R. Lehman, Patrick J. Rengstl, Larry Allen Stumpf, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

337	March 21, 2011 From Approx. 1:57 p.m. Through Approx. 8:45 p.m.	U. S. CODE TITLE 18	Olten Ayres de Abreu Junior Ramon Anzola-Robles Karla Solis Global Corporate Services, Inc. Anzola-Robles & Asociados Romulo Pina Dantas Marcos Joise Bezerra Menezes Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP The Continued Criminal Enterprise
338		§ 371 Conspiracy to Defraud the USA &	
339		§ 241 Conspiracy Against Rights &	
340		§ 242 Deprivation Rights Under Color of Law &	
341		§ 1346 Scheme/Artifice to Defraud &	
342		§ 1343 Wire Fraud &	
343		§ 1961 <i>et seq.</i> – RICO &	
344		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On March 21, 2011, Charles Tavares' ("Tavares"), and Tavares' Companies' Brickell Village One, LLC ("BV One"), 2147 SW 8 Street, LLC ("2147"), and Miami River Park Marina, Inc.'s ("MRPM") ("Tavares' Companies") attorneys, among others, [Thomas R. Lehman](#) ("Lehman"), [Patrick J. Rengstl](#) ("Rengstl"), [Levine Kellogg Lehman Schneider + Grossman, LLP](#) ("LKLS+G"), together with Olten Ayres de Abreu Junior ("Abreu Jr."), a reckless Swiss/ Brazilian attorney, fixer, and "money bag man" for Third-Party Defendant [Romulo Pina Dantas](#) ("Dantas"), and [Marcos Jose Bezerra Menezes](#) ("Menezes"), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Courts"), vitiated by fraud, together with reckless attorney [Ramon Anzola-Robles](#)¹³⁰ ("Anzola-Robles") at [Global Corporate Services](#) a.k.a. [Anzola Robles & Asociados](#) in the Republic of Panama, exchange [E-Mails](#), to further an artifice to fabricate [false, invalid, and fraudulent Limited Power of Attorneys](#) (the "Sham POAs"), falsely and fraudulently giving purported powers to Abreu Jr., to be used only during a Sham Mediation of March 29 ("Sham Mediation"), on behalf of Tavares' Companies, to falsely settle¹³¹ the BRIDGELoAN Case. Because, at all relevant times, the Perpetrators knew – and the record displayed shows that, Tavares, and Tavares only has sole legal authority over Tavares' Companies, the Perpetrators keep the Sham POAs' secret, to covertly deprive and extort Tavares of properties and rights in sham court proceedings.

¹³⁰ Reckless Anzola-Robles is an [Associate](#) of Abreu Jr., based at Avenida Nicanor de Obarrio – Plaza Credicorp Bank, piso 26, in Panamá City, Republic of Panama (+ 507 263-0003 & + 507 263-4224), specialized in providing sham offshore companies and sham Registered Agents to, *inter alia*, transnational money launders of corruption and illicit moneys and tax fraudsters.

¹³¹ Since 2010, Tavares' corrupt attorneys, *inter alia*, Lehman, Rengstl, LKLS+G, together with [Alan Samuel Fine](#), an Associate of BRIDGELoAN's Transnational Continued Criminal Enterprise ("CCE" or "Criminal Enterprise"), are unsuccessfully conning and coercing Tavares to sign a Sham Settlement to extort Tavares of Tavares' two collateral properties, valued over \$50 million dollars, securing BRIDGELoAN's Sham \$12 Million loan. After the unsuccessful artifice, the CCE devises the artifice to use Sham POAs' to extort Tavares at the Sham Mediation, willfully mediated at, and by, a Sham Mediator [Norman Stuart Gerstein](#), from, and [based](#) at Hall Lamb and Hall, BRIDGELoAN's reckless attorneys, to further the scheme. See [Record](#), and [Tavares' Affidavit](#).

COUNTS

Count 337 - Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Jose Bezerra Menezes, Ramon Anzola-Robles, Karla Solis, Global Corporate Services, Inc., Anzola-Robles & Asociados, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, 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 18 U.S.C. §371.

Count 338 - 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 339 - Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry Allen Stumpf, Black Srebnick Kornspan & Stumpf, P.A., and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 340 - Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Jose Bezerra Menezes, Ramon Anzola-Robles, Karla Solis, Global Corporate Services, Inc., Anzola-Robles & Asociados, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, 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 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 18 U.S.C. §1346.

Count 341 – Olten Ayres de Abreu Junior (“Abreu Jr.”) (oabreu@fbt.ch), a Brazilian/Swiss reckless attorney, Thomas Ralph Lehman (“Lehman”) (trl@lklaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”) in Miami, Florida, [Ramon Anzola-Robles](#) (“Anzola-Robles”) (rar@globcorp.net), Global Corporate Services, Inc. a.k.a. [Anzola-Robles & Asociados](#) in the Republic of Panamá, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, [E-mails](#) dated March 21, 2011, *inter alia*, certain [E-mails](#) conspiring and coordinating to fabricate false, invalid, and fraudulent Limited Power of Attorneys (“Sham POAs”) to be fraudulently used in court proceedings in the United States of America, to further a brazen scheme extorting U.S. citizen Charles Tavares of properties and rights in the Sham BRIDGELoAN Case, to wit: **341(a) at 12:57 p.m. (*Country time zone), From Abreu Jr. to Anzola-Robles, and cc Lehman, “Subject: Venetian and Hilo Daer [sic] Ramon, I need a noatrizd [sic] PoA from the mentioned co [companies] to act in a mediation in Miami next 29th, Tom [Lehman] (copied) will send you the terms and a dress [sic] to send**

it, unfortunately it ia [sic] short notice (sorry about it) Thks [sic] Olten [Abreu Jr.] ; **341(b) at 7:45 p.m. (*Country time zone), From Anzola-Robles to Abreu Jr., and cc Lehman**, "Subject: Venetian and Hilo Dear Olten [Abreu Jr.]: Thanks for your message. We will await Tom's [Lehman] contact with the terms and delivery address for the two POAs required for the mediation. Kind regards, RAR [Anzola-Robles]; **341(c) at 7:52 p.m. (*Country time zone), From Abreu Jr. to Anzola-Robles, and cc Lehman and Rengstl**, "Subject: Venetian and Hilo Dear Tom [Lehman] Pls liaise with Ramon in order to have it in your office till next Friday. Thks., Olten [Abreu Jr.]; **341(d) at 5:08 p.m. (*Country time zone), From Abreu Jr. to Anzola-Robles, and cc Lehman and Rengstl**, "Subject: Venetian and Hilo Dear Patrick/Tom, Those PoAs will come from Panama, so they must be executed today in order to be noatrized [sic] and delivered in proper time, pls email the drafts to Ramon [Anzola-Robles]. Rgds., Olten [Abreu Jr.]; and, **341(e) at 5:15 p.m. (*USA, EST), From Lehman to Abreu Jr. and Anzola-Robles, cc Rengstl**, "Subject: Venetian and Hilo Please deliver to: Tom Lehman 201 Biscayne Blvd., 34th Floor, Miami, FL 33131 U.S.A. 305-403-8788 Thomas R. Lehman." At all times relevant, Abreu Jr., Anzola-Robles, Lehman, Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, are conspiring to further a scheme depriving and extorting client/victim Charles Tavares of properties and rights upon subverted proceedings in a court of law in the United States of America, in the sham BRIDGELoan Case, in violation of, 18, U.S.C., § 1343.

Count 342 - At all times relevant, Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Jose Bezerra Menezes, Ramon Anzola-Robles, Karla Solis, Global Corporate Services, Inc., Anzola-Robles & Asociados, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

Count 343 - Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Jose Bezerra Menezes, Ramon Anzola-Robles, Karla Solis, Global Corporate Services, Inc., Anzola-Robles & Asociados, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, and other 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 fabricating the Sham POAs' for Tavares' Companies that they all know is false, invalid and fraudulent, to be secretly used to extort Tavares of properties and rights, under color of law, in a Sham Mediation in Miami, Florida, further using artifices to intimidate, coerce, threat, and extort victim Tavares, in violation of, §817.155, F.S. (Fraudulent Practices); and, **343(a)** Fraudulent issuance of sham membership interest on Tavares' Brickell Village One, LLC, a Florida L.L.C. , in violation of §817.19, F.S. (Fraudulent Issue of Membership Interest); **343(b)** Fraudulent issuance of sham membership interest on Tavares' 2147 SW 8 Street, LLC, a Florida L.L.C. in violation of §817.19, F.S. (Fraudulent Issue of Membership

Interest); **343(c)** Repeated coercion, intimidation, [physical threats](#), and extortion against Tavares and Tavares' family by Abreu Jr., *et al.*, in violation of §836.05, F.S. (Threats & Extortion).

Count 344 – Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

345	March 24, 2011	U. S. CODE TITLE 18	Allan Lester Langer Miami Courts The Criminal Enterprise (CCE)
346		§ 371 Conspiracy to Defraud the USA	
347		& § 241 Conspiracy Against Rights	
348		& § 242 Deprivation of Rights -Under Color of Law	
349		& § 1346 Scheme/Artifice to Defraud	
350		& § 1961 <i>et seq.</i> – RICO	
351	FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices & FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3		

On March 24, 2011, reckless Judge [Allan Lester Langer](#) (“Judge Langer”) (Florida Bar No.137.828), in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting [client](#) Charles Tavares (“Tavares”) of properties and rights under color of law, showing **Omertà Code** to the Associates of the CCE, furthering the scheme, enters an [Order Denying](#) (“**Order Denying Continue Trial & Compel Response**”) on Tavares’ Motions to Continue Trial and Compel. Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. The sham \$12 million loan by sham lender BRIDGELOAN and BNY Mellon is an artifice to extort Tavares of Tavares’ two collateral properties valued over \$50 million dollars, further enabling BRIDGELOAN and BNY Melon to money launder and tax defraud the ill-gotten proceeds. At all relevant times, reckless Judge Langer is systematically furthering the brazen ongoing scheme by BRRIDGELOAN’s CCE, together with implicated officers of the courts, among others, Tavares’ personal and corporate attorneys, Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (LKLS+G”), Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&”), BRIDGELOAN’s reckless attorneys Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., BNY Mellon and attorneys Erica L. English, Harold Eugene Lindsey III, and Katz Barron Faust Squitiero, systematically depriving and extorting Tavares of properties and rights, under color of law. At all relevant times, reckless Judge Langer knows, and the Record displayed shows, a brazen legal farce to extort Tavares of properties and rights, predicated on false and contradictory claims, supported by false and fraudulent evidence, *inter alia*, two (02) false and fraudulent financial [Sworn Affidavits of Joseph Horn](#) on behalf of BRIDGELOAN, and systematic frauds upon the court by officers of the court, including, by among others, Tavares’ corrupted attorneys LKLS+G and Black Srebnick, showing Judge Langer is corrupted into the scheme extorting Tavares.

COUNTS

Count 345 - 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 18 U.S.C. §371.

Count 346 - Judge Allan Lester Langer, the 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 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 347 – Judge Allan Lester Langer, the Miami Courts, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 348 - Judge Allan Lester Langer, the 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 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 349 – At all times relevant, Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, Brideloan Investors, Inc., BNY Mellon, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.,* Record and [Tavares Sworn Affidavit](#).

Count 350 - Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitero Faust, Brideloan Investors, Inc., BNY Mellon, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 351 – Judge Allan Lester Langer, 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, 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
352	March 24 and 25, 2011	U. S. CODE TITLE 18	Thomas Ralph Lehman Patrick J. Rengstl Jennifar M. Hill Elsa S. Fresco LKLS+G, LLP Larry Allen Stumpf Black Srebnick Kornspan & Stumpf Olten Ayres de Abreu Junior The Continued Criminal Enterprise
353		§ 371 Conspiracy to Defraud the USA &	
354		§ 241 Conspiracy Against Rights &	
355		§ 242 Deprivation Rights Under Color of Law &	
356		§ 1346 Scheme/Artifice to Defraud &	
357		§ 1343 Wire Fraud &	
358		§ 1961 <i>et seq.</i> – RICO &	
359		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On March 24 and 25, 2011, Charles Tavares' ("Tavares") [personal and corporate attorneys](#), [Thomas R. Lehman](#) ("Lehman"), [Patrick J. Rengstl](#), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) ("LKLS+G"), covertly and fraudulently representing client/victim Tavares, and Tavares' Companies Brickell Village One, LLC ("BV One"), 2147 SW 8 Street, LLC ("2147"), and Miami River Park Marina, Inc. ("MRPM") ("Tavares' Companies"), to extort Tavares' Properties in sham proceedings in the sham *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 ("BRIDGELOAN" Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Courts"), vitiated by fraud, responding to Tavares' many requests, including, *e.g.*, on March 24, 2011 at 4:17 p.m., to LKLS+G, as [Tavares' Companies sole legal authority](#), see also [Tavares' Affidavit](#), submits, via [E-mail](#), on March 25, 2011 at 11:19 a.m., the [Bankruptcy Schedules](#) for Tavares' Companies, for LKLS+G to file for Bankruptcy Protection, allowing Tavares to sell one of the two collateral properties, valued over \$50 million dollars, to one of several prospective buyers Tavares has been negotiating with, to pay off the sham \$12 million dollars loan by sham lender BRIDGELOAN and enabler Mellon United National Bank, N.A. a.k.a. MUNB Loan holdings, LLC n.k.a. [The Bank of New York Mellon](#) ("BNY Mellon"). Since Tavares first retained, in 2008, and continuing, Lehman to represent Tavares individually, and Tavares' Companies in the BRIDGELOAN Case, the specific reason client Tavares hired Lehman, is because Lehman is a "[Bankruptcy Specialized attorney](#)," and if Tavares could not resolve the issues with Sham Lender BRIDGELOAN, and Tavares' Investors Romulo Pina Dantas ("Dantas") and Marcos Jose Bezerra de Menezes ("Menezes"), responsible to make the interest payments for the Sham Loan, Tavares, could file for Bankruptcy protection to allow Tavares to orderly sell one of the two properties, saving millions of dollars in excess equity and still keep the second property free and clear. What Tavares did not know at that time, is that, at all relevant times, Lehman and LKLSG are falsely representing Tavares and Tavares' Companies, conspiring, together with BRIDGELOAN's Continued Criminal Enterprise ("CCE" or "Criminal Enterprise"), and other bad actors implicated, furthering the scheme depriving and extorting Tavares of properties and rights, and are secretly and fraudulently producing fraudulent Power of Attorneys to extort Tavares

of properties and rights upon a Sham Mediation of March 29, 2011, by [sham mediator Norman Stuart Gerstein](#), from BRIDGELoan's attorneys Hall Lamb and Hall's offices, and Lehman and LKLS+G never followed Tavares' orders to file for Bankruptcy Protection, as the sole legal authority for Tavares' Companies, knowingly and intentionally, causing Tavares losses over \$50 million dollars.

COUNTS

Count 352 - 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 18 U.S.C. §371.

Count 353 - 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 354 - Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 355 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 356 – Thomas R. Lehman (“Lehman”) (trl@lklaw.com), Patrick J. Rengstl (pjr@lklaw.com), Jennifar M. Hill, [Elsa S. Fresco](#), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, conning, coercing, depriving, stealing and extorting client/victim Charles Tavares (“Tavares”) of properties and rights, under color of law, in subverted proceedings upon Miami Courts, *inter alia*, certain E-Mails, dated March 25, 2011, to further a scheme extorting Tavares of properties and rights, by conning and defrauding client Tavares of proper legal representation, willfully failing to obey orders to file for Bankruptcy Protection for Tavares' Companies, to wit: **356(a) on March 25, 2011 at 8:44 a.m., from Lehman to Tavares (ctavares@bellsouth.net)**, cc Larry A. Stumpf (“Stumpf”), Jennifar M. Hill (“Hill”), Elsa S. Fresco (“Elsa Fresco”), Olten Ayres de Abreu Jr. (“Abreu Jr.”)(olten@fbt.ch), Rengstl: *“Subject: Re: Miami River Park Marina, Inc., Brickell Village One, LLC – Bankruptcy Strategy Charles, Elsa will be contacting you and sending you the bankruptcy schedules, statement of financial affairs and other papers the two companies must complete to file Chap. 11. I’d also like to have input on the Carlisle Contract so we are to make it complies with bankruptcy practice. When all of us meet*

Monday afternoon we can review the papers. Thomas R. Lehman”; **356(b)** on **March 25, 2011 at 11:02 a.m., from Tavares to Lehman, cc Stumpf, Hill, Elsa Fresco, Abreu Jr., and Rengstl**, *“Tom [Lehman] Have not yet received! Please have your office send it as soon as possible to allow my office to prepare the required documents so we have it for discussion Monday. Thank you. Charles”*; and, **356(c)** on **March 25, 2011 at 11:19 a.m., from Elsa Fresco to Tavares and Lehman, cc Stumpf, Hill, Elsa Fresco, Abreu Jr., and Rengstl**, *“Hi Charles, Attached are the form of the petition, schedules and statement of financial affairs. Please call me if you have any questions. Elsa S. Fresco, Paralegal LKLS+G”*. At all relevant times, Lehman and LKLS+G, Tavares’ Companies attorneys, are secretly conspiring with BRIDGELoAN, *et al.*, to deprive and extort Tavares of Tavares’ properties and rights, and never properly represented Tavares, and never intended, or followed Tavares’ orders to file for bankruptcy protection, since Lehman and LKLS+G are Associates of BRIDGELoAN’s Criminal Enterprise, and submit the sham E-mails to further the scheme extorting Tavares, in violation of Title 18, U.S.C., §1343.

Count 357 - At all times relevant, Thomas R. Lehman, Patrick J. Rengstl, Elsa S. Fresco, Levine Kellogg Lehman Schneider + Grossman, LLP, 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 358 - Thomas Ralph Lehman, Parick J. Rengstl, Elsa S. Fresco, Levine Kellogg Lehman Schneider + Grossman, LLP, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, inter alia, systematically conning, coercing and extorting Tavares to accept a fraudulent settlement 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 359 –Thomas Ralph Lehman, Patrick J. Rengstl, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
360	March 28, 2011 at 1:38 p.m.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl
361		§ 241 Conspiracy Against Rights &	Marlen Cabo LKLS+G, LLP
362		§ 242 Deprivation Rights Under Color of Law &	Olten Ayres de Abreu Junior Larry Allen Stumpf
363		§ 1346 Scheme/Artifice to Defraud &	Jared Michael Lopez Black Srebnick Kornspan & Stumpf
364		§ 1343 Wire Fraud &	The Continued Criminal Enterprise
365		§ 1961 <i>et seq.</i> – RICO &	
366		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On March 28, 2011 at 1:38 p.m., client/victim Charles Tavares' ("Tavares") corrupt attorneys Thomas R. Lehman ("Lehman"), and Patrick J. Rengstl ("Rengstl"), at Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry A. Stumpf ("Stumpf"), and Jared Michael Lopez ("Lopez"), at Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or "BSK&S"), together with reckless [Brazilian/Swiss](#) attorney, fixer, and "Money Bag Man", [Olten Ayres de Abreu Jr.](#) ("Abreu Jr."), sent to Miami, Florida, on March 28, 2011, by Tavares' investor and Third-Party Defendant [Romulo Pina Dantas](#) ("Dantas"), and [Marcos Jose Bezerra Menezes](#) ("Menezes"), to further a scheme extorting Charles Tavares ("Charles Tavares") of properties and rights, under color of law, in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case. No. 2009-93058-CA-30 ("BRIDGELoAN" Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Courts"), vitiated by fraud, exchange a certain E-mail at 1:38 p.m. to further an artifice to covertly deprive and extort client/victim Tavares of properties and rights, valued over \$50 million dollars, in a Mediation¹³² of March 29, 2011 ("Sham Mediation"), in the sham BRIDGELoAN Case relating to BRIDGELoAN's¹³³ and MUNB Loan Holdings, LLC, a Delaware company a.k.a. The Bank of New York Mellon's ("BNY Mellon") sham \$12 million dollars loan. The Perpetrators, after devising an artifice to secretly fabricate [false, invalid and fraudulent Limited Power of Attorneys for Tavares' Companies Defendants](#) Brickell Village One, LLC ("BV One"), 2147 SW 8 Street, LLC ("2147") and Miami River Park Marina, Inc. ("MRPM") ("Tavares' Companies"), to further the criminal scheme extorting Tavares of properties and rights in the Sham Mediation, exchange a certain [E-mail "Settlement Term Sheet"](#) to be used, together with secret fraudulent POAs' for Tavares' Companies that the Perpetrators fabricated to further the brazen scheme upon the Miami Courts.

¹³² The Perpetrators, willfully set up the Sham Mediation to be mediated at, and by, a Sham Mediator [Norman Stuart Gerstein](#), from, and [based](#) at Hall Lamb and Hall, BRIDGELoAN's reckless attorneys, to further the scheme, coercing, threatening, depriving, and extorting victim Tavares of properties and rights in sham proceedings. See [Record](#), and [Tavares' Affidavit](#).

¹³³ Unknown to borrower/victim Tavares at the time, BRIDGELoAN is a sham lender used by a Transnational Continued Criminal Enterprise ("CCE" or "Criminal Enterprise"), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) ("BNY Mellon"), enabler & facilitator of BRIDGELoAN.

COUNTS

Count 360 - 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 18 U.S.C. §371.

Count 361 - 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 362 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 363 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 364 – Thomas Ralph Lehman (“Lehman”) (trl@lkllaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lkllaw.com), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf (“Stumpf”) (LStumpf@royblack.com), Olten Ayres de Abreu Junior (“Abreu Jr.”) (oabreu@fbt.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings, certain [E-mail](#) of Monday, March 28, 2011 at 1:38 p.m., **From Lehman, To Stumpf, Abreu Jr., and cc Rengstl and LKLS+G**, to wit: **364(a)** *“Subject: FW Bridgeloan Term Sheet Attachments: image001.gif; EN1636.docx Attached is the Settlement Term Sheet that our side gave to Bridgeloan and Mellon Bank [BNY Mellon] last December. It may be the basis to begin negotiations tomorrow. We can discuss today. Thomas R. Lehman – Partner LKLS+G ”*; and, on March 28, 2011 at 1:35 p.m., an [E-mail](#), **364(b) From Marlen Cabo at LKLS+G, To Lehman** *“Subject: Bridgeloan Term Sheet” with attachment EN1636.docx.*, relating to the Perpetrators’ artifice to further a scheme to extort Tavares with [false, invalid, and fraudulent fabricated Power of Attorneys](#) to be covertly and fraudulently used to extort at a Sham Mediation of March 29, 2011, in violation of 18 U.S.C. §1343.

Count 365 - At all times relevant, Thomas R. Lehman, Patrick J. Rengstl, Marlen Cabo, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), 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, 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 366 –Thomas Ralph Lehman, Patrick J. Rengstl, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
367	March 28, 2011	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Olten Ayres de Abreu Junior Romulo Pina Dantas
368		§ 241 Conspiracy Against Rights &	Marcos Jose Bezerra Menezes Alan Samuel Fine
369		§ 242 Deprivation Rights Under Color of Law &	Ramon Anzola-Robles Karla Solis
370		§ 1346 Scheme/Artifice to Defraud &	Global Corporate Services, Inc. Anzola-Robles & Asociados
371		§ 1343 Wire Fraud &	Thomas Ralph Lehman Patrick J. Rengstl
372		§ 1952–Interstate Travel in-aid-of Racketeering &	LKLS+G, LLP Larry Allen Stumpf
373		§ 1951 Extortion (Hobbs Act) &	Jared Michael Lopez Black Srebnick Kornspan & Stumpf
374		§ 1961 <i>et seq.</i> – RICO	The Continued Criminal Enterprise

On March 28, 2011, [Brazilian/Swiss](#) attorney, fixer, and “*Money Bag Man*”, [Olten Ayres de Abreu Jr.](#) (“Abreu Jr.”) is sent to Miami, Florida, by Tavares’ investor and Third-Party Defendant [Romulo Pina Dantas](#) (“Dantas”), and [Marcos Jose Bezerra Menezes](#) (“Menezes”), to further a scheme extorting Charles Tavares (“Charles Tavares”) of properties and rights, under color of law, in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud. The record shows,¹³⁴ *inter alia*, Dantas, Menezes, and sham¹³⁵ lender BRIDGELOAN stroke a side deal to extort Tavares of Tavares’ two Properties valued over \$50 million dollars securing a sham \$12 million dollars loan caused into default by BRIDGELOAN’s systematic torts and interference. After the Perpetrators devised an artifice to fabricate [false, invalid and fraudulent Limited Power of Attorneys for Tavares’ Companies Defendants](#) Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”), to further the criminal scheme extorting Tavares of properties and rights upon court proceedings of Mediation, set for March 29, 2011, Abreu Jr. travels to Miami, FL, United States, in aid-of-racketeering. At all relevant times, the Perpetrators know that they are using court proceedings in a court of law in the United States to further schemes, *inter*

¹³⁴ In August 2013, Tavares obtained emails upon discovery in the Related Case, *Charles Tavares, Brickell Village One, LLC, and 2147 SW 8 Street, LLC v. Thomas R. Lehman and Levine Kellogg Lehman + Scheider +Grossman, LLP*, Case No. 2013-12223-CA-40, showing abundant evidence of a conspiracy to coerce, deprive, and extort Tavares of properties and rights in sham proceedings, by Thomas R. Lehman (“Lehman”), Alan S. Fine (“Fine”), Abreu Jr., Tavares’ corrupted co-counsels Black Srebnick Kornspan & Stumpf (“BSK&S” or “Black Srebnick”), BRIDGELOAN, Hall Lamb and Hall, BNY Mellon, and attorneys Katz Barron Faust Squitero, *et al.*, and, showing among other things, that, Tavares’ personal and corporate attorneys Lehman and LKLS+G, and personal co-counsel Black Srebnick, at all relevant times, are falsely and fraudulently representing client/victim Tavares, systematically conning, intimidating, coercing, and extorting Tavares of Tavares’ properties and rights, furthering BRIDGELOAN’s successful scheme depriving and extorting Tavares of properties and rights upon the sham proceedings. See Record.

¹³⁵ Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), enabler & facilitator of BRIDGELOAN.

alia, deprive the United States, and the State of Florida of honest services upon a court of law, deprive Tavares guaranteed rights to due process of law, and extort Tavares of properties and rights. To further the scheme, Abreu Jr., *et al.*, repeatedly coerces, intimidates, and [makes threats to Tavares and Tavares' family](#), to extort Tavares of properties and rights, corrupting and bribing officers of the courts in the BRIDGEOAN Case, among others, [Lehman, Rengstl, LKLS+G, Fine](#), Alan S. Fine, P.A., [Marco Emilio Rojas, R&S International Law, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A.](#)

COUNTS

Count 367 - 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 18 U.S.C. §371.

Count 368 - 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 369 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 370 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 371 – Olten Ayres de Abreu Junior (“Abreu Jr.”) (oabreu@fbt.ch), Karla Solis (“Karla Solis”) (KSolis@globcorp.net), Ramon Anzola-Robles (“Anzola-Robles”) (rar@globcorp.net), [Anzola-Robles & Asociados](#) a.k.a. Global Corporate Services, Inc. (“Anzola-Robles & Asociados”), Thomas Ralph Lehman (“Lehman”) (trl@lklaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lklaw.com), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings, certain [E-mail](#) of Monday, March 28, 2011 at 3:10 p.m., **From Abreu Jr. To Karla Solis and Anzola-Robles, cc Lehman, Rengstl and LKLS+G**, to wit: **291(a)** *“Subject: PoA Urgent Dear Karla [Karla Solis], I am in Miami, the mediation will take place tomorrow and Tom [Lehman], copied, did not receive, the PoAs, could you send me a scanned copy of each and tracking #? Asap. Thks., Olten [Abreu Jr.] Envoyé de mon iPhone”*, relating to the Perpetrators' scheme to further Tavares' extortion with [false, invalid, and fraudulent fabricated Power of Attorneys](#) to be covertly and fraudulently used to extort at a Sham Mediation of March 29, 2011, in violation of 18 U.S.C. §1343.

Count 372 – Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney and a fixer for Romulo Pina Dantas and Marcos Jose Bezerra de Menezes, did knowingly and intentionally, as part of a scheme depriving, coercing, and extorting U.S. citizen Charles Tavares, travel in-aid-of racketeering to Miami, FL, on March 28, 2011, to, among other things, coerce, intimidate, extort, and bribe, among others, officers of the court, in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, and to coerce, [physically threat](#), steal, and extort Tavares of properties and rights, in violation of 18 U.S.C. §1952 (Interstate Travel in-aid-of Racketeering).

Count 373 – Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a “*Money Bag Man*”, for Romulo Pina Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares’ family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 374 - At all times relevant, Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Jose Bezerra Menezes, Thomas R. Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Erica L. English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), 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, 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
375	March 28, 2011 at 6:05 p.m.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Olten Ayres de Abreu Junior Romulo Pina Dantas Marcos Jose Bezerra Menezes Alan Samuel Fine Ramon Anzola-Robles Karla Solis Global Corporate Services, Inc. Anzola-Robles & Asociados Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP The Continued Criminal Enterprise
376		§ 241 Conspiracy Against Rights &	
377		§ 242 Deprivation Rights Under Color of Law &	
378		§ 1346 Scheme/Artifice to Defraud &	
379		§ 1343 Wire Fraud &	
380		§ 1952–Interstate Travel in-aid-of Racketeering &	
381		§ 1951 Extortion (Hobbs Act) &	
382		§ 1961 <i>et seq.</i> – RICO	

On March 28, 2011, at 6:05 p.m., as part of an artifice to deprive and extort victim Charles Tavares (“Tavares”), a U.S. citizen, in court proceedings in the United States of America, in in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), reckless Panamanian attorney Ramon Anzola-Robles (“Anzola-Robles”) from Global Corporate Services, Inc. a.k.a. Anzola-Robles & Asociados (“Anzola-Robles & Asociados”), in the Republic of Panamá, following orders from [Associate Olten Ayres de Abreu Jr.](#) (“Abreu Jr.”), a reckless [Brazilian/Swiss](#) attorney, fixer, and “*Money Bag Man*”, travelling to Miami, Florida, sent by Tavares’ investor and Third-Party Defendant [Romulo Pina Dantas](#) (“Dantas”), and [Marcos Jose Bezerra Menezes](#) (“Menezes”), transmits, via E-mail, across country lines, an [E-mail](#), containing patently false, invalid, and fraudulent Power of Attorneys (“Sham POAs”) to be covertly used to falsely, invalidly and fraudulently settle the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud. At all relevant times, the Perpetrators implicated knew that Tavares, and Tavares only, had the sole legal authority over Tavares’ Companies Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”), and that, Tavares never authorized, nor authorize anyone to authorize the fabrication of Sham POAs’ to fraudulently settle the Sham BRIDGELOAN Case, and that Tavares issued express orders not to settle. Tavares did order LKLS+G to file for Bankruptcy Protection, to, *inter alia*, sell one of the two Tavares’ Properties, valued over \$50 million, securing the Sham BRIDGELOAN¹³⁶ \$12million loan, to pay off the Sham Loan, preserving millions of dollars in excess equity, and keeping the second property free and clear. At all times, the Perpetrators know they are conspiring to deprive and extort Tavares of properties and rights.

¹³⁶ Unknown to borrower/victim Tavares at the time, BRIDGELOAN is a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), enabler & facilitator of BRIDGELOAN.

COUNTS

Count 375 - 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 18 U.S.C. §371.

Count 376 - 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 377 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 378 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 379 – Karla Solis (“Karla Solis”) (KSolis@globcorp.net), Ramon Anzola-Robles (“Anzola-Robles”) (rar@globcorp.net), [Anzola-Robles & Asociados](#) a.k.a. Global Corporate Services, Inc. (“Anzola-Robles & Asociados”), Olten Ayres de Abreu Junior (“Abreu Jr.”) (oabreu@fbt.ch), Thomas Ralph Lehman (“Lehman”) (trl@lkllaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lkllaw.com), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings, a certain [E-mail](#) of Monday, March 28, 2011 at 6:05 p.m., **From Karla Solis and Anzola-Robles To Abreu Jr., cc Lehman, Rengstl, LKLS+G, and Anzola-Robles**, to wit: **379(a)** *“Subject: PoA Urgent Attachments: image001.png; image002.gif; image003.gif; HILO HATTIE INVESTMENTS INC. 28032011165758907.pdf; VENETIAN ISLES HOLDINGS INC. 280320111656466661.pdf - Dear Doctor Abreu: Thanks for your previous message and phone call today. In this respect, kindly find attached herein a scanned copy of the requested Powers of Attorneys of HILO HATTIE INVESTMENTS INC. and VENETIAN ISLES HOLDINGS INC. duly legalized by the Apostille. The original documents are being sent directly to the attention of Mr. Thomas R. Lehman by Courier DHL Express No. 813 5530 476. Should you require any further assistance, do not hesitate to contact us. Best regards, Karla Solis”*, relating to the Perpetrators’ scheme to further Tavares’ extortion with [SHAM POAs](#), the [false, invalid, and fraudulent fabricated Power of Attorneys](#) to be covertly and fraudulently used to extort at a Sham Mediation of March 29, 2011, in violation of 18 U.S.C. §1343.

Count 380 – Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney and a fixer for Romulo Pina Dantas and Marcos Jose Bezerra de Menezes, did knowingly and intentionally, as part of a scheme depriving, coercing, and extorting U.S. citizen Charles Tavares, travel in-aid-of racketeering to Miami, FL, on March 28, 2011, to, among other things, coerce, intimidate, threat, extort, and bribe, among others, officers of the court, in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, and to coerce, [physically threat](#), steal, and extort Tavares of properties and rights in violation of 18 U.S.C. §1952 (Interstate Travel in-aid-of Racketeering).

Count 381 – Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a “*Money Bag Man*”, for Romulo Pina Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, successfully bribes officers of the courts, among others, Tavares’ attorneys Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and Larry Allen Stumpf, Jared Michael Lopez, and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BKS&S”), and repeatedly, [makes threats to Tavares and Tavares’ family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 382 - At all times relevant, Olten Ayres de Abreu Junior, Ramon Anzola-Robles, Karla Solis, Anzola-Robles & Asociados, Romulo Pina Dantas, Marcos Menezes, Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Erica L. English, Harold Eugene Lindsey III, Katz Barron Faust Squitiero, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), 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, 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
383	March 29, 2011 From 10:00 a.m. Through To Around 4:00 p.m.	U. S. CODE TITLE 18	Olten Ayres de Abreu Junior Romulo Pina Dantas Marcos Jose Bezerra Menezes Ramon Anzola-Robles Thomas Ralph Lehman LKLS+G, LLP Larry Allen Stumpf Black Srebnick Kornspan & Stumpf Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Bridgeloan Investors, Inc. Matthew Paul Leto Hall Lamb and Hall, P.A. Erica Lee English Harold Eugene Lindsey III Katz Barron Faust Squitiero, P.A. The Bank of New York Mellon Allan Lester Langer Norman Stuart Gerstein The Continued Criminal Enterprise
384		§ 371 Conspiracy to Defraud the USA &	
385		§ 241 Conspiracy Against Rights &	
386		§ 242 Deprivation Rights Under Color of Law &	
387		§ 1346 Scheme/Artifice to Defraud &	
388		§ 1952–Interstate Travel in-aid-of Racketeering &	
389		§ 1951 Extortion (Hobbs Act) &	
390		§ 1961 <i>et seq.</i> – RICO &	
391		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d) & FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	

On March 29, 2011, starting from around 10:00 a.m., through around 4:00 p.m., as part of a scheme depriving and extorting Charles Tavares (“Tavares”) of properties and rights upon sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings LLC*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, a Sham Mediation¹³⁷ (“Sham Mediation”) is held at Plaintiff’s Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) reckless attorneys Hall Lamb and Hall, P.A.’s (“Hall & Lamb”) offices, mediated by a sham mediator [Norman Stuart Gerstein](#) (“Sham Mediator Gerstein”), based at the [same offices of Hall & Lamb](#). Unknown to Tavares at the time, BRIDGELOAN is a Transnational Continued Criminal Enterprise¹³⁸ (“CCE” of Criminal Enterprise”) led by “Boss,” [Joseph Horn](#) (“Horn”).

¹³⁷ The Sham Mediation is set up by Hall & Lamb, and Tavares’ corrupted personal and corporate attorneys [Thomas R. Lehman](#), and [Patrick J. Rengstl](#) at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”) after LKLS+G fails to coerce, to further the scheme, the client/victim Tavares to sign a sham settlement agreement giving control over Tavares’ Companies Defendants holding Tavares’ Two Properties, valued over \$50 million dollars in lieu of the Sham \$12 million BRIDGELOAN loan, and after LKLS+G’s learns from Tavares, that Tavares is negotiating to sell one of the properties to pay off the sham BRIDGELOAN loan.

¹³⁸ The CCE, uses, *inter alia*, [Horn Eichenwald Investments, Inc.](#), [h2acapital](#) f.k.a. [Bridgeloan Partners, Corp. a Florida corp.](#) (Tax Id. #86-3280908), [Dartley Securities Limited](#) (Bahamas) and [Dartley Bank & Trust Limited](#) (Bahamas), [BRIDGEINVEST, LLC](#), [BRIDGEINVEST Fund GP, LLC](#), a Delaware corp., [BRIDGEINVEST Fund GP II, LLC](#), a Delaware corp., [BRIDGEINVEST Fund GP III, LLC](#), a Delaware corp., and counterparts, *inter alia*, [BANIF Securities, Inc.](#), Cayman Islands (“BANIF”), and other BANIF affiliated entities hijacked by the CCE (“collectively, “BANIF”), and [Integra Solutions, LLC](#), a Florida L.L.C. (“INTEGRA”) with millions of dollars in fraudulent claims and deductions of mortgage/loan/portfolio tax-free bonds interest, further defrauding the United States of millions of dollars of taxable income, allowing Associates of the CCE, *e.g.*, [Joseph Horn](#), [Alex Horn](#), [Slosbergas](#), [Rojas](#), *et al.*, to live in [The Gables Estates](#) and [Key Biscayne](#), enjoying the security and comfort of the United States, provided by hard-working tax-paying Americans that they [systematically](#) steal from to improperly feed their lavishly lifestyle. See Record.

At 9:30 a.m., Tavares, and Tavares' attorneys [Larry A. Stumpf](#) ("Stumpf"), at [Black Srebnick Kornspan & Stumpf](#) ("Black Srebnick" or "BSK&S"), and Lehman at [LKLS+G](#), and Third-Party [Romulo P. Dantas](#) ("Dantas"), and [Marcos Menezes](#) ("Menezes") personal representative, [Brazilian/ Swiss](#) attorney, fixer, and "*Money Bag Man*", [Olten Ayres de Abreu Jr.](#)¹³⁹ ("Abreu Jr."), meet at the lobby of Sham Mediator Gerstein's office building – same as Hall & Lamb' offices. Immediately, Lehman, falsely states, on behalf of Tavares' Companies, that, the strategy is to give BRIDGELoAN Tavares' two separate properties, valued over \$50 million, securing the Sham \$12 million Loan, caused into default by BRIDGELoAN's systematic and repeated torts. Tavares is shocked because Tavares has repeatedly denied any sham settlement giving up two separate properties, each worth many millions of dollars more than the Sham Loan. Stumpf, already bribed and corrupted into the scheme extorting client/victim Tavares, falsely plays "*good cop*,"¹⁴⁰ responding to Lehman, "*You are already giving up everything! What are we doing here?*" Tavares, the sole legal authority for Tavares' Companies' Defendants, orders, again, his attorneys to file for Bankruptcy Protection. At 10:00 a.m., the Sham Mediation starts, attended by Tavares and Tavares' attorneys Stumpf and Lehman, and Third-Party Representative Abreu Jr., and Horn on behalf of BRIDGELoAN, and its reckless attorney [Mathew Paul Leto](#) ("Leto"), at Hall & Lamb, and Sham Mediator Gerstein, with Andrew C. Hall ("Andy Hall") in the back office. Immediately, Sham Mediator Gerstein, following Tavares' attorneys coercion and intimidation to extort Tavares' properties and rights, states, to coerce Tavares to settle, that, "*that fellow out there, Andy Hall, is pretty tough*", "*You are against very strong people,*" *That fellow out there, Andy Hall, beat Saddam Hussein, he beat Gaddafi, and Fidel Castro*", and "*that other fellow, Joseph Horn, he is as tough as Hall,*" which had nothing to do with the mediation, but it is an artifice to intimidate, coerce and extort Tavares. After a couple hours, as Tavares do not relent to be extorted, the parties break for lunch at the Ritz Carlton's Restaurant nearby. During lunch, Tavares again order his attorneys to file for Bankruptcy Protection, and again, Lehman refuses. Stumpf, pulls Tavares from lunch to go back to Hall & Lamb's offices, and tells Tavares, *inter alia*, "*what's wrong with this guy [Lehman]? You hired him to file Bankruptcy Protection and he refuses!*" Upon restarting mediation, after lunch, Tavares still refuses a settlement, and then, reckless Abreu Jr. states, "*Let me go out there and talk to Joseph Horn. We speak the same language*" A few minutes later, Abreu Jr. comes back to the mediation room, and states: "*It's settled!*" Tavares replies, "*Are you crazy?*" Abreu Jr., states, "*It is settled, and we give you \$2 million cash!*" Tavares refuses to settle and, again, orders Lehman to file for Bankruptcy Protection, and leaves the mediation. At around, 5:00 p.m., Stumpf Calls Tavares, trying to coerce Tavares, stating: "*Charles, take the money, is \$2 million dollars in the kitchen table.*" Tavares refuses the sham settlement. Unknown to Tavares at the time, Lehman, Rengstl, and Abreu Jr., *et al.*, have fabricated fraudulent POAs' to falsely and fraudulently settle, extorting Tavares.

¹³⁹ Abreu Jr. travels, on March 28, 2011, to Miami, Florida, in-aid-of racketeering, to further the scheme, coercing, intimidating, threatening, and extorting Tavares, after covertly developing an artifice, with Tavares' attorneys' Lehman, Rengstl, LKLS+G, Stumpf, [Jared Michael Lopez](#) ("Lopez"), Black Srebnick, and reckless Panamanian attorney [Ramon Anzola-Robles](#) ("Anzola-Robles"), and Karla Solis ("Karla Solis"), at [Global Corporate Services, Inc.](#) a.k.a. [Anzola-Robles & Asociados](#) ("Anzola-Robles & Asociados"), in the Republic of Panamá, to fabricate, and use at the Sham Mediation, [false, invalid and fraudulent Power of Attorneys](#) ("Sham POAs'") to falsely settle the BRIDGELoAN Case on behalf of [Tavares' Companies' Defendants](#), Brickell Village One, LLC, a Florida L.L.C., 2147 SW 8 Street, LLC, a Florida LLC, and Miami River Park Marina, Inc., a Florida corp. ("MRPM").

¹⁴⁰ The truth and the record displayed, uncovered through discovery in a legal malpractice suit against Tavares' personal and corporate attorneys Lehman and LKLS+G, see *Tavares, BV One and 2147 v. Thomas Lehman and LKLS+G*, Case No.2013-12223-CA-40, shows that, at all relevant times, Stumpf, Lopez, and Black Srebnick had been bribed and bought by Abreu Jr., and are covertly conspiring to further BRIDGELoAN's scheme to extort Tavares of properties and rights upon the sham proceedings.

COUNTS

Count 383 - 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 18 U.S.C. §371.

Count 384 - 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 385 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 386 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 387 – Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney and a fixer for Romulo Pina Dantas and Marcos Jose Bezerra de Menezes, did knowingly and intentionally, as part of a scheme depriving, coercing, and extorting U.S. citizen Charles Tavares, travel in-aid-of racketeering to Miami, FL, on March 28, 2011, to, among other things, coerce, intimidate, extort, and bribe, among others, officers of the court, in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, and to coerce, [physically threat](#), steal, and extort Tavares of properties and rights in violation of 18 U.S.C. §1952 (Interstate Travel in-aid-of Racketeering).

Count 388 – Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a “*Money Bag Man*”, for Romulo Pina Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [makes threats to Tavares and Tavares’ family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 389 - At all times relevant, Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Menezes, Ramon Anzola-Robles, Karla Solis, Global Corporate Services, Inc., Anzola-Robles & Asociados, Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Marco Emilio Rojas, Alan Samuel Fine, Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Erica L. English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), 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 and victims, coercing, threatening, 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 390 –Thomas Ralph Lehman, Patrick J. Rengstl, Larry Allen Stumpf, Jared Michael Lopez, Norman Stuart Gerstein, Mathhew Paul Leto, Andrew Clifford Hall, Alan Samuel Fine, Erica Lee English, Harold Eugene Lindsey III, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

Count 391 – Judge Allan Lester Langer, 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, 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
392	March 29, 2011 at 2:49 P.M. and Continuing	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Lauren Vargas LKLS+G, LLP Mickey Paillard Taillard Capital The Continued Criminal Enterprise
393		§ 241 Conspiracy Against Rights &	
394		§ 242 Deprivation Rights Under Color of Law &	
395		§ 1346 Scheme/Artifice to Defraud &	
396		§ 1343 Wire Fraud &	
397		§ 1951 Extortion (Hobbs Act) &	
398		§ 1961 <i>et seq.</i> – RICO &	
399		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On March 29, 2011, starting from, at least, 2:49 p.m., and continuing, as part of a scheme depriving and extorting Charles Tavares (“Tavares”) of properties and rights, during a Sham Mediation,¹⁴¹ knowingly and intentionally set up, by among others, Tavares’ corrupted personal and corporate attorneys Thomas Lehman (“Lehman”), and Patrick J. Rengstl (Rengstl”), at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and reckless Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) attorneys Mathew Paul Leto (“Leto”), and Andrew C. Hall (“Andy Hall”), *et al.*, to coerce, intimidate, threaten, and extort Tavares of two properties (“Tavares’ Properties”) valued over \$50 million dollars securing BRIDGELoAN’s Sham \$12 million dollars loan, in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings LLC*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, Lehman, to further the extortion of client/victim Tavares, exchanges [E-mails](#) with information and appraisals of client/victim Tavares’ Properties, with a prospective buyer,¹⁴² Mickey Taillard (“Mickey Taillard”), at Taillard Capital (“Taillard Capital”) at a time Lehman and LKLS+G should be providing proper legal advice at [mediation](#), and following Tavares’ orders to file for Bankruptcy Protection for Tavares’ Companies, showing Lehman, Rengstl, and LKLS+G, are totally corrupted into the scheme. At all times, corrupted attorneys LKLS+G are extorting [client](#) Tavares.

¹⁴¹ The Sham Mediation is set up by Hall & Lamb, and Tavares’ corrupted personal and corporate attorneys [Thomas R. Lehman](#), and [Patrick J. Rengstl](#) at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”) after LKLS+G fails to coerce, to further the scheme, the client/victim Tavares to sign a sham settlement agreement giving control over Tavares’ Companies Defendants holding Tavares’ Two Properties, valued over \$50 million dollars in lieu of the Sham \$12 million dollars BRIDGELoAN loan, and after LKLS+G’s learns from Tavares, that Tavares is negotiating to sell one of the properties to pay off the sham loan.

¹⁴² Lehman, Rengstl, Lauren Vargas (“Vargas”), and LKLS+G, all know, and the [record shows](#), that client Tavares, and Tavares only, has the [sole legal authority over Tavares’ Companies](#), Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc., holding title for Tavares’ Properties, and Tavares never authorized Lehman and LKS+G to, *inter alia*, market/negotiate to sell Tavares’ Properties. The record now shows that, at all relevant times, Tavares’ attorneys Lehman, Rengstl, LKLS+G, Stumpf, Lopez, and BSK&S, are conspiring, together with BRIDGELoAN, to extort [client/victim](#) Tavares of properties and rights, willfully failing to, *e.g.*, obey Tavares’ orders, and [covertly fabricating Sham POAs](#) to extort Tavares.

COUNTS

Count 392 - 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 18 U.S.C. §371.

Count 393 - 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 394 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 395 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 396 – Thomas Ralph Lehman (“Lehman”) (trl@lkllaw.com), Patrick J, Rengstl (“Rengstl”) (pjr@lkllaw.com), Lauren Vargas (“Lauren Vargas”) (LVargas@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Mickey Taillard (“Taillard”) (mtaillard@taillardcapital.com), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings, certain [E-mails](#) of March 28, 2011 – to wit: **396(a) at 2:49 p.m., From Lehman to Taillard cc. Rengstl:** *“Subject Patrick [Rengstl] will email you the appraisals Thomas R. Lehman”*; **396(b) at 2:52 p.m., From Taillard to Lehman cc. Rengstl:** *“Subject RE: Patrick [Rengstl] will email you the appraisals – Thanks, Patrick [Rengstl] Please send me the 2 appraisals asap. Sincerely, Mickey Taillard”*; **396(c) at 3:04 p.m., From Rengstl to Taillard and Lehman, cc Lauren Vargas:** *“Subject RE: Patrick [Rengstl] will email you the appraisals – Hi Mickey. I’m out of the office on business, but I’ll have my secretary email them to you asap. Lauren, in the Bridgeloan case, please email asap the affidavit of Anderw Magenheimer with attachments (there are two appraisals) to Mickey Taillard, who is copied on this email. You need to split up the emails because the appraisals are voluminous. Thanks”*; **396(d) at 3:28 p.m., From Lauren Vargas to Taillard, cc Rengstl:** *“Subject RE: Patrick [Rengstl] will email you the appraisals – Pursuant to Mr. Rengstl’s instructions, attached please find a copy of the Affidavit for A. Magenheimer. Thank you, Lauren Vargas Legal Assistant LKLS+G”*; and, **396(e) at 4:06 p.m., From Taillard to Lauren Vargas, cc Rengstl:** *“Subject RE: Patrick [Rengstl] will email you the appraisals – Thank you. Do you have the appraisal for the apartment buildings [Tavares’ Brickell Buildings]? I only see the appraisal for the mariner. Mickey”*, continuously conspiring behind client/victim Tavares’ back, to systematically deprive and extort Tavares of properties and rights, in violation of 18 U.S.C. §1343.

Count 397 – Thomas Ralph Lehman, Patrick J. Rengstl, Lauren Vargas, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), together with Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a “*Money Bag Man*”, for Romulo Pina Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly and systematically, [makes threats to Tavares and Tavares’ family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 398 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Lauren Vargas, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), 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, 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 399 –Thomas Ralph Lehman, Patrick J. Rengstl, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

400	March 30, 2011	U. S. CODE TITLE 18	Allan Lester Langer Miami Courts The Criminal Enterprise (CCE)
401		§ 371 Conspiracy to Defraud the USA &	
402		§ 241 Conspiracy Against Rights &	
403		§ 242 Deprivation of Rights -Under Color of Law &	
404		§ 1346 Scheme/Artifice to Defraud &	
405		§ 1961 <i>et seq.</i> – RICO &	
406	FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices & FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3		

On March 30, 2011, reckless Judge [Allan Lester Langer](#) (“Judge Langer”) (Florida Bar No.137.828), in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further a scheme upon the Miami Courts extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, signs an [Order Granting](#) (“**Order Granting Motion to Sever Third-Party Complaint**”) on Tavares’ Motion to Sever Third-Party Claim from BRIDGELOAN Case. At all relevant times, the record demonstrates a brazen legal farce to extort Tavares, with false and contradictory claims, supported by, among other things, [Two Fraudulent Financial Sworn Affidavits of BRIDGELOAN’s Joseph Horn](#) (“Horn”), falsely inflating millions of dollars in claims against Tavares, showing officers of the court, *inter alia*, reckless Judge Langer, Tavares’ personal and corporate attorneys Thomas R. Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), Levine Kellogg Lehman Schneider + Grossman, LLP (LKLS+G”), Larry A. Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), and Black Srebnick Kornspan & Stumpf, P.A. (Black Srebnick” or BSK&S”), together with reckless attorneys Matthew Paul Leto (“Leto”), Andrew Clifford Hall (“Andy Hall”), and Hall Lamb and Hall, P.A. (“Hall & Lamb”), and Erica Lee English (“English”), Harold Eugene Lindsey III (“Lindsey III”), and Katz Barron Faust Squitiero (“Katz Barron”), systematically depriving and extorting Tavares of Tavares’ two collateral properties valued over \$50 million dollars in lieu of a sham \$12 million dollars by BRIDGELOAN, a sham lender used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender Mellon United National Bank, N.A. a.k.a. MUNB Loan Holdings, LLC, a Delaware L.L.C. a.k.a. [The Bank of New York Mellon](#) (“BNY Mellon”), an enabler and facilitator of BRIDGELOAN. Among other things, the Record, and the Case’s Docket, shows, Plaintiff’s BRIDGELOAN sham and contradictory undisposed [Second Motion for Summary Judgment](#) (“Second Motion Summary for Judgment”), filed on March 14, 2011 – and without any responses from Tavares’ personal and corporate attorneys LKLS+G and Black Srebnick. The Order Granting Motion to Sever Third Party Complaint is filed on March 31, 2011, and there is no Notice, or Order scheduling, for a specific date or time, any court proceedings.

COUNTS

Count 400 - 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 18 U.S.C. §371.

Count 401 - Judge Allan Lester Langer, the 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 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 legal representation free from intimidation, harassment, and extortion of properties and rights upon a Bankruptcy Federal Court in the USA, in violation of, among other things, 18 U.S.C. §241. *See, e.g.,* U.S. Const., Amend. XIV.

Count 402 – Judge Allan Lester Langer, the Miami Courts, and other Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 403 - Judge Allan Lester Langer, the 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 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 404 – At all times relevant, Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitero Faust (“Katz Barron”), Brideloan Investors, Inc., The Bank of New York Mellon (“BNY Mellon”), 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, securities frauds, crimes against the United States, intercontinental money laundering of illicit funds, extortion, and systematic violation of rights, contrary to 18 U.S.C. §1961 *et seq.* *See, e.g.,* Record and [Tavares Sworn Affidavit](#).

Count 405 - Judge Allan Lester Langer, the Miami Courts, Matthew Paul Leto, Andrew Clifford Hall, Hall, Lamb and Hall, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider +

Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), Erica Lee English, Harold Eugene Lindsey III, Katz Barron Squitero Faust (“Katz Barron”), Brideloan Investors, Inc., The Bank of New York Mellon (“BNY Mellon”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 406 – Judge Allan Lester Langer, 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, 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
407	March 30, 2011 at 5:04 P.M. and, at 5:48 P.M.	U. S. CODE TITLE 18	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Olten Ayres de Abreu Junior Romulo Pina Dantas Marcos Jose Bezerra Menezes The Criminal Enterprise (CCE)
408		§ 371 Conspiracy to Defraud the USA &	
409		§ 241 Conspiracy Against Rights &	
410		§ 242 Deprivation of Rights -Under Color of Law &	
411		§ 1346 Scheme/Artifice to Defraud &	
412		§ 1343 Wire Fraud &	
413		§ 1961 <i>et seq.</i> – RICO &	
414		FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On March 30, 2011, criminals,¹⁴³ Thomas R. Lehman (“Lehman”), and Patrick J. Rengstl (“Rengstl”), at Levine Kellogg Lehman Schneider + Grossman, LLP, at all relevant times, [conspiring](#) to deprive and extort [client/victim](#) Charles Tavares (“Tavares”) of properties and rights, in the sham styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, to further a scheme, invalidly and fraudulently, on behalf of [Tavares’ Companies Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc., (collectively “Tavares’ Companies”), agree¹⁴⁴ to terms of an [agreed Fraudulent Settlement](#) with Bridgeloan Investors, Inc. (“BRIDGELOAN”) (“Fraudulent Settlement”). To further the scheme, fraudulently giving sham lender BRIDGELOAN Tavares’ Two Properties, valued over \$50 million in lieu of a Sham \$12 million loan, with BRIDGELOAN’s reckless attorney Matthew P. Leto (Leto”), at Hall Lamb and Hall, transmits an [E-mail](#), stating, “Dear Patrick and Thomas, In light of the stipulation regarding the judgment amount and on liability, the only issue is the mechanism by which a sale will occur. Bridgeloan will agree to two separate sales...” At all relevant times, Leto, Lehman, Rengstl, Abreu Jr., *et al.*, know the [settlement is invalid and fraudulent](#), and that the \$16.5 million sham ‘agreed’ judgment is predicated on [Joseph Horn’s Fraudulent Affidavits](#) claiming millions of dollars in inflated default interest paid by Tavares, and [received by BRIDGELOAN](#).

¹⁴³ See Criminal definition under Merriam-Webster Dictionary: “one who has committed a crime;” “of an illegal act for which someone can be punished by the government.” *See also*, some of the more than 1.370 violations of State and Federal Statutes by Associates of the Criminal Enterprise at E-Filing #78629565, at Miami-Dade Civil Cases Record.

¹⁴⁴ Unknown to Tavares at the time, Tavares’ corrupt attorneys Lehman, Rengstl, and LKLS+G, and Larry A. Stumpf, Jared Michael Lopez, and Black Srebnick Kornspan & Stumpf, P.A., together with reckless Swiss / Brazilian attorney Dantas’ personal representative Olten Ayres de Abreu Junior (“Abreu Jr.”), and reckless Panamanian attorney Ramon Anzola-Robles, [secretly fabricated fraudulent Power of Attorneys for Tavares’ Companies](#) (“Sham POAs”) to be used to fraudulently settle the sham BRIDGELOAN Case, at a [Sham Mediation](#) of March 29, 2011, in case the Perpetrators could not successfully coerce, threat, and extort [client](#) Tavares to accept, on behalf of [Tavares’ Companies Defendants](#), a Fraudulent Settlement at the Sham Mediation.

COUNTS

Count 407 - 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 18 U.S.C. §371.

Count 408 - 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 409 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 410 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 411 – Matthew P. Leto (“Leto”) (MLeto@hlhlawfirm.com), Hall Lamb and Hall, P.A. (“Hall & Lamb”), Thomas R. Lehman (“Lehman”) (trl@lklaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Olten Ayres de Abreu Junior (“Abreu Jr.”) (olten@fbc.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings, certain [E-Mails](#) of March 30, 2011 – to wit: **411 (a) at 5:04 p.m., From Leto to Rengstl, cc Lehman:** *“Subject Bridgeloan – For Settlement Purposes Only - Dear Patrick and Thomas In light of the stipulation regarding the judgment amount and on liability, the only issue is the mechanism by which a sale will occur. Bridgeloan will agree to two separate sales. The first sale will be the Brickell property, in which Bridgeloan will have a \$11.5 million credit bid [fraudulently placing the Lion’s share of the debt allocation on Tavares’ Collateral Property]. The Second sale will be of the Miami River property, in which Bridgeloan will have a credit bid for the difference on the judgment, or approximately \$6 million [fraudulently placing the lowest debt allocation on BRIDGELoan/BNY MELLON’S Sham Loan’s subject property] . Should there be a bid on the first property in excess of \$11.5 million, the credit bid for the Miami River property will be reduced by this excess amount and any additional funds will go to Bridgeloan to pay down the remaining part of the loan. Should no bids occur in the Brickell property, Bridgeloan’s credit bit on the Miami River property will remain \$6 million. However, if a bidder purchases the Miami River for an amount in excess of \$6 million, Bridgeloan will be entitled to those funds up to the fill amount owed on the loan, or \$16.5 mm plus taxes owed and any additional costs. Please be advised that any acceptance of this procedure must be approved by MUNB [The Bank of New York Mellon] Very Truly yours, Matthew Leto”;* and **411(b) at 5:48 p.m., From Lehman to Abreu Jr.**

“Subject FW: Bridgeloan – Attachments image001.gif [Forwarded E-mail of Leto] - Thomas R. Lehman LKLS+G”, showing Lehman, Rengstl, et al., continuously conspiring behind client/victim Tavares’ back, to systematically deprive and extort Tavares of properties and rights, in violation of 18 U.S.C. §1343.

Count 412 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Olten Ayres de Abreu Junior (“Abreu Jr.”), Romulo Pina Dantas (“Dantas”), Marcos Jose Bezerra Menezes (“Menezes”), Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A. (“Hall & Lamb”), Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., 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, fabricating and filing false documents and Affidavits, influencing witnesses, coercing, threatening, 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 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, e.g., Record and [Tavares Sworn Affidavit](#).

Count 413 – Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Olten Ayres de Abreu Junior (“Abreu Jr.”), Romulo Pina Dantas (“Dantas”), Marcos Jose Bezerra Menezes (“Menezes”), Matthew P. Leto, Andrew Hall, Hall Lamb and Hall, P.A. (“Hall & Lamb”), Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., and other 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, [covertly fabricating false, invalid, and fraudulent Power of Attorneys](#) of client/victim Charles Tavares’ (“Tavares”) [Companies Defendants](#) in the BRIDGELoAN Case, to further a scheme extorting Tavares of properties and rights, and systematically conning, intimidating, threatening, coercing, and extorting client Charles Tavares to further the scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 414 – Thomas Ralph Lehman, Patrick J. Rengstl, Matthew Paul Leto, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at [www.floridabar.org](#).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
415	March 31, 2011 at 3:28 P.M.	U. S. CODE TITLE 18	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Olten Ayres de Abreu Junior Romulo Pina Dantas Marcos Jose Bezerra Menezes The Criminal Enterprise (CCE)
416		§ 371 Conspiracy to Defraud the USA &	
417		§ 241 Conspiracy Against Rights &	
418		§ 242 Deprivation of Rights -Under Color of Law &	
419		§ 1346 Scheme/Artifice to Defraud &	
420		§ 1343 Wire Fraud &	
421		§ 1961 <i>et seq.</i> – RICO &	
422		FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On March 31, 2011, criminals Thomas R. Lehman (“Lehman”), and Patrick J. Rengstl (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), at all relevant times, conspiring to deprive and extort client/victim Charles Tavares (“Tavares”) of properties and rights, in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the Eleventh Judicial Circuit for Miami-Dade County, Florida (“Miami Courts”), vitiated by fraud, to further the scheme, falsely, invalidly and fraudulently, on behalf of Tavares’ Companies Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”), states, in a sham E-mail to reckless BRIDGELOAN’s attorney Matthew Paul Leto (“Leto”) at Hall Lamb and Hall, P.A., copied to reckless, and Third-Party Defendant Romulo Pina Dantas’ (“Dantas”), personal representative, Brazilian/Swiss attorney, fixer, and “Money Bag Man”, Olten Ayres de Abreu Junior (“Abreu Jr.”), that, “*Matthew, Subject to the finalizing an agreed judgment of foreclosure acceptable to the defendants the corporate defendants accept the proposal for two sales and splitting the plaintiff’s credit bid...*” Lehman, Rengstl, LKLS+G, Leto, Hall & Lamb, Abreu Jr., BRIDGELOAN, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon (“BNY Mellon”), *et al.*, all know in truth and in fact that, Tavares, and Tavares only, has the sole legal authority of Tavares’ Companies Defendants a.k.a. “*corporate defendants,*” and Tavares never authorized, nor authorized anyone to authorize, or agree to a settlement¹⁴⁵ in the BRIDGELOAN Case on behalf of Tavares’ Companies Defendants. The Fraudulent Settlement, fraudulently ‘agreed’ by officers of the court furthering a scheme upon the court, *inter alia*, by Tavares’ attorneys LKLS+G & Black Srebnick, *et al.*, is, and always will be, false, invalid, and fraudulent (“Fraudulent Settlement”), forever, null and void.

¹⁴⁵ The Fraudulent Settlement, follows years of continued and systematic torts and interferences by sham lender BRIDGELOAN’s Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), together with co-lender BNY Mellon – an enabler and associate of BRIDGELOAN, and Tavares’ corrupted attorneys, to deprive, steal, and extort Tavares of Tavares’ Two Collateral properties valued over \$50 million dollars in lieu of BRIDGELOAN-BNY Mellon’s Sham \$12 million loan.

COUNTS

Count 415 - 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 18 U.S.C. §371.

Count 416 - 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 417 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 418 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 419 – Thomas Ralph Lehman (“Lehman”) (trl@lklaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Matthew Paul Leto (“Leto”) (MLeto@hlhlawfirm.com), Hall Lamb and Hall, P.A. (“Hall & Lamb”), and Olten Ayres de Abreu Junior (“Abreu Jr.”) (olten@fht.ch”), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings, a certain [E-Mail](#) of March 31, 2011 – to wit: **419 (a) at 3:28 p.m., From Lehman to Leto and Rengstl, cc Abreu Jr.:** *“Subject Re: Bridgeloan – Attachments: image001.gif - Matthew, Subject to the finalizing an agreed judgment of foreclosure acceptable to the defendants **the corporate defendants accept the proposal for two sales and splitting the plaintiff’s credit bid.** One issue we have is the credit bid amounts. A mortgagee is entitled to credit bid up the total amount of the debt, \$16,534,248.15 plus accrued interest, publication expenses and protective advances. Your credit bid totals \$17.5 million. How about a credit bid of \$10,534,248.15 plus interest on Brickell and \$6 million on the Marina? Or any other allocation that totals \$16,534,248 plus interest. I assume the gross up to \$17.5 million is to cover outstanding taxes. Here’s our proposal to deal with your concern about including the unpaid tax liability as part of a settlement: The judgment can include a provision providing (1) if the successful bidder for one of the properties is a third party who is not an assignee of the plaintiff’s credit bid on the property, the sales proceeds in excess of the credit bid amount for such property would be paid to plaintiff up to an amount equal to the sum of the 2008, 2009, and 2010 real estate taxes paid or redeemed by plaintiff; and (2) if the successful bidder for one or more of the properties is plaintiff or plaintiff’s assignee, the amount of any deficiency shall include the sum of the unpaid 2008, 2009 and 2010 taxes for the property (that’s the law anyway).*”

*If (1) occurs, the third party purchaser will take subject to any unpaid taxes so the taxes will no longer be an issue for Bridgeloan; If Bridgeloan is redeeming the 2008 tax certificates between now and the foreclosure sale, (1) makes sure Bridgeloan is covered. Would you like me to prepare a proposed judgment? Thomas R. Lehman – LKLS+G”. Lehman, Rengstl, LKLS+G, Leto, Hall & Lamb, Abreu Jr., et al., all know in truth and in fact, and the [Record](#) shows, that Tavares, and Tavares only, has the sole legal authority of Tavares’ Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc., and Tavares [never authorized anyone](#), nor authorized anyone to authorize, the fraudulent settlement on behalf of Tavares’ Companies BV One, 2147, and MRPM. The Sham Agreed Judgement shows millions of dollars in inflated and fraudulent claims for “Default Interest” from [Joseph Horn’s Sham Affidavits](#) that Tavares paid, and BRIDGELoAN received, showing, *inter alia*, the Sham Settlement is predicated on frauds by officers of the court, upon the court, extorting Tavares of properties and rights, rendering the court’s orders vitiated by fraud, fraudulent & void, in violation of 18 U.S.C. §1343.*

Count 420 - At all times relevant, Thomas Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Olten Ayres de Abreu Junior, Romulo Dantas, Marcos Menezes, Matthew Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, 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, 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 421 – Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Olten Ayres de Abreu Junior, Matthew Leto, Hall Lamb and Hall, P.A., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 422 –Thomas Lehman, Patrick Rengstl, Matthew Leto, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

423	April 1, 2011 From 11:18 a.m. Through 12:46 p.m. and Continuing	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights -Under Color of Law & § 1346 Scheme/Artifice to Defraud & § 1343 Mail Fraud & § 1961 <i>et seq.</i> – RICO & <u>FLORIDA STATUTES</u> TITLE XLVI § 817.155 Fraudulent Practices & <u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Olten Ayres de Abreu Junior Romulo Pina Dantas Marcos Jose Bezerra Menezes Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf The Criminal Enterprise (CCE)
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On April 1, 2011, criminals Thomas R. Lehman (“Lehman”), and Patrick J. Rengstl (“Rengstl”), at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), at all relevant times, conspiring to extort client/victim Charles Tavares (“Tavares”) of properties and rights, in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the Eleventh Judicial Circuit for Miami-Dade County, Florida (“Miami Courts”), vitiated by fraud, to further a scheme, invalidly and fraudulently, on behalf of Tavares’ Companies Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”), states, in a sham E-mail at 11:23 a.m., to reckless BRIDGELoAN’s attorney Matthew Paul Leto (“Leto”) at Hall Lamb and Hall, P.A., copied to reckless, and Third-Party Romulo P. Dantas’ (“Dantas”), personal representative, Brazilian/ Swiss attorney, fixer, and “*Money Bag Man*”, Olten Ayres de Abreu Junior (“Abreu Jr.”), that, “*Matt, Attached is a form of two sale foreclosure judgement I had entered in another case. It needs some modifying for possible deal being discussed by the parties. I will take a shot at drafting one for our case unless you don’t want me to. Thomas R. Lehman LKLS+G*”. Lehman, Rengstl, LKLS+G, Stumpf, Lopez, Black Srebnick, *et al.*, know that Tavares has the sole legal authority for Tavares’ Companies, and Tavares repeatedly ordered LKLS+G and Black Srebnick not to settle with BRIDGELoAN, and instead, to file for Bankruptcy Protection to preserve millions of dollars in equity of Tavares’ Two Properties, valued over \$50 million dollars, in lieu of a \$12 million dollars Sham Loan. Tavares’ attorneys LKLS+G and Black Srebnick, showing they are corrupted into BRIDGELoAN’s scheme extorting Tavares, systematically disobey Tavares’ orders not settle, and orders to file for Bankruptcy, and secretly agree to a fraudulent judgment of \$16.5 million, including millions of dollars in false Default Interest, fraudulently claimed on Joseph Horn’s Fraudulent Affidavits, fabricated by BRIDGELoAN’s attorney Leto, and providing Zero (\$0.00) dollars to Tavares, showing extortion and fraud upon the courts by officers of the court, rendering the court’s decisions null & void.

COUNTS

Count 423 - 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 18 U.S.C. §371.

Count 424 - 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 425 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 426 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 427 – Thomas Ralph Lehman (“Lehman”) (trl@lklaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf (“Stumpf”) (LStumpf@royblack.com), Matthew P. Leto (“Leto”) (MLeto@hlhlawfirm.com), Hall Lamb and Hall, P.A. (“Hall & Lamb”), and Olten Ayres de Abreu Junior (“Abreu Jr.”) (olten@fbt.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings, certain [E-mails](#) of April 1, 2011 – to wit: **427 (a) at 11:18 a.m., From Lehman To Stumpf:** *“Larry I sent the below response to Matt Leto’s proposal. He responded that I was correct about the maximum amount of the aggregate credit bid. Now that Bridgeloan has agreed to Defendant’s only remaining defense, there should be two sales, I am preparing an agreed judgment to circulate. Thomas R. Lehman”*; **427 (b) at 11:23 a.m., From Lehman to Leto, cc Rengstl, Abreu Jr., and Stumpf:** *“Subject Bridgeloan v. Miami River et al – Matt, Attached is a form of two sale foreclosure judgement I had entered in another case. It needs some modifying for possible deal being discussed by the parties. I will take a shot at drafting one for our case unless you don’t want me to. Thomas R. Lehman LKLS+G”*; **427 (c) at 11:27 a.m., From Leto to Lehman, cc Rengstl, Abreu Jr., and Stumpf:** *“Subject Bridgeloan v. Miami River et al– Thomas [Lehman] - There is one issue I want to raise based upon your prior email. In your email, you state that any money received by Plaintiffs over the credit bid would go to Plaintiff only upon to the amount of unpaid taxes. I assume then that anything over that amount would go to the Defendants. Under our procedure, anything over the credit bid would go to Plaintiffs up to the amount of the entire judgment. However, that would effectively reduce the credit bid in the second sale”*;

427 (d) at 12:18 p.m., From Lehman To Leto, cc Rengstl, Abreu Jr., and Stumpf: “Subject Bridgeloan v. Miami River et al – Understood. I will have it reflected in a draft judgment. Thomas R. Lehman LKLS+G”; **427 (e) at 12:46 p.m., From Stumpf To Lehman, cc Lopez:** “Subject FW: Bridgeloan – will the judgment provide for no judgment on guaranty” Larry A. Stumpf.” Tavares’ corrupt attorneys Lehman, Rengstl, LKLS+G, Stumpf, Lopez, and Black Srebnick, at all times relevant, conspiring to coerce, deprive and extort Tavares of properties and rights, under color of law, and repeatedly disobeying [client/victim Tavares’ orders as the sole legal authority for Tavares’ Companies Defendants](#) Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”), together with reckless BRIDGELoAN’s attorneys Leto, Hall & Lamb, and Abreu Jr., *et al.*, all know in truth and in fact, and the [Record](#) shows, that Tavares, and Tavares only, has the sole legal authority of Tavares’ Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc., and Tavares never authorized anyone, nor authorized anyone to authorize, among others, Lehman, Rengstl, LKLS+G, Stumpf, BSK&S, Leto, Hall & Lamb, Abreu Jr., BRIDGELoAN, to agree to settle the BRIDGELoAN Case on behalf of Tavares’ Companies BV One, 2147, and MRPM. The Fraudulent *agreed* Settlement includes false inflated claims of millions of dollars in fabricated “Default Interest,” predicated on BRIDGELoAN’s [Joseph Horn’s Two Fraudulent Affidavits](#), that the record shows, and [BRIDGELoAN’s Horn acknowledges receiving](#) from Tavares. The [sham agreed judgement of \\$16.5 million Settlement](#), predicated on extortion, and frauds upon the courts, by officers of the courts, *et al.*, see [E-mails](#), is invalid, false, and fraudulent, forever null and void, furthering a scheme to extort Tavares, in violation of 18 U.S.C. §1343.

Count 428 - At all times relevant, Thomas R. Lehman, Patrick Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Korsan & Stumpf, P.A., Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Menezes, Matthew P. Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, 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 false documents and Affidavits, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail & 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 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 429 – Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Korsan & Stumpf, P.A., Olten Ayres de Abreu Junior, Matthew Leto, Hall Lamb and Hall, P.A., Bridgeloan Investors, Inc., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent

Count 430 – Thomas Ralph Lehman, Patrick J. Rengstl, Larry Allen Stumpf, Jared Michael Lopez, Matthew Paul Leto, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of false, invalid, and fraudulent Power of Attorneys of client/victim Charles Tavares to secretly and fraudulently settle the BRIDGELOAN Case against client/victim Tavares orders not to settle, systematically omitting relevant facts and the truth from the client/victim Charles Tavares, fabricating sham corporate documents, systematically furthering known underlying tax fraud schemes upon the sham court proceedings, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

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

431	April 1, 2011 From 2:52 P.M. Through April 4, 2011 at 9:59 A.M. And Continuing	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights -Under Color of Law & § 1346 Scheme/Artifice to Defraud & § 1343 Mail Fraud & § 1961 <i>et seq.</i> – RICO & FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf The Criminal Enterprise (CCE)
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On April 1, 2011, at 2:52 p.m., Charles Tavares (“Tavares”), after receiving bits¹⁴⁶ of information, from Tavares’ corrupt attorneys [Thomas R. Lehman](#) (“Lehman”), [Patrick J. Rengstl](#) (“Rengstl”), [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), [Larry A. Stumpf](#) (“Stumpf”), [Jared Michael Lopez](#) (“Lopez”), and [Black Srebnick Kornspan & Stumpf, P.A.](#) (“Black Srebnick” or “BSK&S”), about a Sham Settlement with BRIDGELoAN on behalf of Tavares’ Companies Defendants, Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”), in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, submits an [E-mail](#) at 2:52 p.m., summoning Tavares’ attorneys LKLS+G and Black Srebnick for a meeting on April 6, 2011, to discuss strategies for trial, as Tavares continues believing a settlement will not be possible with the “greedy lenders.” At all relevant times, [Tavares](#) [personal and corporate attorneys LKLS+G](#) and Black Srebnick are knowingly and intentionally conspiring together with BRIDGELoAN, [Matthew P. Leto](#), Hall & Lamb, Third-Party Defendant [Romulo Pina Dantas’](#) personal representative [Olten Abreu Junior](#) (“Abreu Jr.”), *et al.*, to deprive and extort, under color of law, Tavares of properties and rights, upon sham court proceedings.

¹⁴⁶ Unknown to unsuspecting [client/victim](#) Tavares, Tavares’ corrupt attorneys [LKLS+G](#) and [Black Srebnick](#), at all relevant times, are conspiring jointly to covertly extort client Tavares, and Tavares’ Companies Defendants of properties and rights upon the sham proceedings, and [have already secretly agreed](#), against client/victim Tavares’ orders not to settle, to an “agreed” \$16.5 million dollars judgment, providing Zero (\$0.00) dollars to Tavares, while including millions in false *Default Interest* predicated on fraudulent claims on BRIDGELoAN’s [Joseph Horn’s Two Fraudulent Affidavits](#), that LKLS+G and Black Srebnick know, and the record shows, are patently false, and fraudulent, while, to further the scheme, knowingly and intentionally failing to prepare for “trial”, and willfully disobeying client Tavares’ orders to file for Bankruptcy Protection to properly and orderly sell one of Tavares’ Two Properties, valued over \$50 million dollars, allowing Tavares to pay off the Sham \$12 million dollars BRIDGELoAN loan, preserving millions of dollars in excess equity, and further allowing Tavares to keep Tavares’ second property free & clear.

COUNTS

Count 431 - 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 18 U.S.C. §371.

Count 432 - 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 433 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 434 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 435 – Thomas R. Lehman (“Lehman”) (trl@lkllaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf (“Stumpf”) (LStumpf@royblack.com), and Olten Ayres de Abreu Junior (“Abreu Jr.”) (olten@fbt.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares (“Tavares”) (ctavares@bellsouth.net) of properties and rights upon sham court proceedings, certain [E-Mails](#) of April 1, through 4, 2011 – to wit: **435 (a), on April 1, 2011 at 2:52 p.m., From Tavares To Lehman, Rengstl, Stumpf, cc Tavares’ assistant Eliane Arce:** *“Subject: Meeting - Tom [Lehman], Good afternoon. I would like to see if we could set up a meeting sometime convenient to you all, on Wednesday 6th to discuss trial scheduled for Friday, the 8th as I do not believe we will be able to settle with greedy lenders et al, and certainly I do not agree with anything I have heard from the parties so far, therefore I have a couple options I would like to discuss with you before we move forward with strategy for the trial. Thank you and regards. Charles [Tavares]”*; **435 (b), on April 2, 2011 at 4:11 p.m., From Lehman To Tavares, Rengstl, Stumpf, cc Eliane Arce, and Lehman adding Abreu Jr.:** *“Subject : RE: Meeting – My Wednesday is open. Larry, Patrick? Charles, so far it appears that Bridgeloan is willing to have two foreclosure sales with \$10 MM credit bid for Brickell [Tavares’ Brickell Buildings] and about a \$6.4 MM credit bid for the Marina [Tavares’ 9 Acres Miami River Marina Property]”*; **435 (c), on April 4, 2011 at 9:21 a.m., From Tavares To Lehman, Rengstl, Stumpf, cc Tavares’ assistant Eliane Arce and Abreu Jr.:** *“Subject: Meeting - Tom [Lehman], Good morning and thank you for the reply. I believe it is in the best interest of our corporations and assets to explore options as I would like to discuss with you all In Wednesday relating to our defenses,*

counter claims, and recent discoveries I have done. Please confirm time. Thank you Charles [Tavares]"; **435 (d)**, on April 4, 2011 at 9:47 a.m., From Lehman To Tavares, Rengstl, Stumpf, cc Tavares' assistant Eliane Arce and Abreu Jr.: "Wednesday at 10 or anytime in the afternoon after 1:30 Thomas R. Lehman"; and, **435 (e)**, on April 4, 2011 at 9:59 a.m., From Stumpf To Tavares, Lehman, Rengstl, cc Tavares' assistant Eliane Arce "Subject: Meeting – 10am works better for me (I could do 1:30 if that's best for others..) Larry A. Stumpf". Tavares' corrupt attorneys Lehman, Rengstl, LKLS+G, Stumpf, Lopez, and Black Srebnick, at all times relevant, conspiring to coerce, deprive and extort Tavares of properties and rights, under color of law, repeatedly disobeying Tavares' orders, as the sole legal authority for [Tavares' Companies Defendants](#) Brickell Village One, LLC ("BV One"), 2147 SW 8 Street, LLC ("2147"), and Miami River Park Marina, Inc. ("MRPM"), together with reckless BRIDGELOAN's attorneys Leto, Hall & Lamb, and Abreu Jr., et al., have already secretly and fraudulently *agreed* to a Fraudulent Judgment of \$16.5 million, see secret [E-Mail](#) of March 31, 2011, willfully depriving and extorting Tavares of Tavares' Two Properties valued in excess of \$50 million dollars to further the scheme extorting Tavares of properties and rights, under color of law in sham proceedings. Because, at all relevant times, [Tavares' attorneys Lehman, Rengstl, LKLS+G](#), Stumpf, Jared Michael Lopez, and Black Srebnick, know Tavares has ordered them not settle, and instead file for Bankruptcy, and proceed with defenses and counter claims, they [secretly fabricate false, invalid and fraudulent Power of Attorneys](#) for [Tavares' Companies' Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. to falsely and secretly settle with BRIDGELOAN. Tavares never authorized anyone, nor authorized anyone to authorize, among others, Lehman, Rengstl, LKLS+G, Stumpf, BSK&S, Leto, Hall & Lamb, Abreu Jr., BRIDGELOAN, to agree to settle the BRIDGELOAN Case on behalf of Tavares' Companies BV One, 2147, and MRPM. The Fraudulent *agreed* \$16.5 million Settlement includes patently false inflated claims of millions of dollars in fabricated "*Default Interest*," predicated on BRIDGELOAN's [Joseph Horn's Two Fraudulent Affidavits](#), that the record shows, and LKLS+G and BSK&S know to be fraudulent, and that [BRIDGELOAN acknowledges receiving](#) from Tavares. The Sham Settlement, predicated on extortion, and frauds upon the courts, by officers of the courts, et al., furthering the scheme to extort Tavares, see [E-mails](#), is invalid, false, and fraudulent, forever null and void, in violation of 18 U.S.C. §1343.

Count 436 - At all times relevant, Thomas R. Lehman, Patrick Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornsan & Stumpf, P.A., Olten Ayres de Abreu Junior, Romulo Pina Dantas, Marcos Menezes, Matthew P. Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, 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, furthering a scheme to extort Tavares, 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 et seq. See, [Tavares Sworn Affidavit](#).

Count 437 – Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornsan & Stumpf, P.A., Olten Ayres de Abreu Junior, Matthew Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 438 – Thomas Ralph Lehman, Patrick J. Rengstl, Larry Allen Stumpf, Jared Michael Lopez, Matthew Paul Leto, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of false, invalid, and fraudulent Power of Attorneys of client/victim Charles Tavares to secretly and fraudulently settle the BRIDGELoan Case against client/victim Tavares orders not to settle, systematically omitting relevant facts and the truth from the client/victim Charles Tavares, fabricating sham corporate documents, systematically furthering known underlying tax fraud schemes upon the sham court proceedings, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

439	April 5, 2011 at 12:04 P.M.	U. S. CODE TITLE 18	Thomas Ralph Lehman Patrick J. Rengstl Robin Barrera LKLS+G, LLP Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf Olten Ayres de Abreu Junior The Criminal Enterprise (CCE)
440		§ 371 Conspiracy to Defraud the USA &	
441		§ 241 Conspiracy Against Rights &	
442		§ 242 Deprivation of Rights -Under Color of Law &	
443		§ 1346 Scheme/Artifice to Defraud &	
444		§ 1343 Mail Fraud &	
445		§ 1961 <i>et seq.</i> – RICO &	
445		FLORIDA STATUTES	
446		TITLE XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 5, 2011, at 12:04 p.m., criminals [Thomas R. Lehman](#)¹⁴⁷ (“Lehman”), at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), falsely representing client/victim Charles Tavares (“Tavares”), continuously for years, to further a scheme to covertly con, coerce, deprive, steal, and extort Tavares of Tavares’ Properties and rights, in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, to further the scheme, forwards Tavares’ [E-mail](#) of April 5, 2011 at 11:26 a.m., to Third-Party Defendant [Romulo Pina Dantas](#) (“Dantas”), personal representative, [Brazilian/Swiss](#) attorney, fixer, and “*Money Bag Man*”, [Olten Ayres de Abreu Junior](#) (“Abreu Jr.”). On the forwarded E-Mail, Tavares, states, *inter alia*, “*we have an opportunity to get a business resolution on this matter thru a successful Bankruptcy filing to protect the assets...*”

¹⁴⁷ Lehman, is introduced to Tavares in early 2005, by Tavares’ longtime attorneys [Stephen Ames Freeman](#) (“Freeman”), [Robert Michael Haber](#) (“Haber”), and [Marco Emilio Rojas](#) (“Rojas”), at Freeman Haber Rojas & Stanham (“FHR&S”), as a [Bankruptcy specialized attorney](#), to represent [Tavares in the purchase](#) of a 9 Acres Miami River Marina property (“MRPM’s Property”) being auctioned off by the Federal Bankruptcy Court of Miami, Florida, Chapter 11: Consolidated Yacht Corp., a Florida corp., Case No.:2002-19483 BKC-RAM. Since that time, Lehman has continuously, represented Tavares and Tavares’ companies, and in 2008, [Tavares engages Lehman](#) to also [represent Tavares individually, and Tavares’ Companies](#) Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”) in the BRIDGELOAN matter, in case Tavares is not able to amicably resolve the issues relating to BRIDGELOAN’s tortious interference, *inter alia*, with Tavares’ investors funding BRIDGELOAN’s and its enabler [The Bank of New York Mellon](#) (“BNY Mellon”) \$12 million dollars Sham Loan, secured by Tavares’ Two Properties valued over \$50 million dollars. As part of an underlying scheme to extort Tavares of all properties and rights by BRIDGELOAN’s Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”) – which, unknown to Tavares at the time, Freeman, Rojas, *et al.*, are CCE’s Associates. Lehman, to gain Tavares trust and confidence, falsely befriends Tavares, and Tavares’ family for years – [having diners at Tavares’ home and restaurants](#), inviting Tavares’ family to Lehman and wife [Amy Lehman’s country house in Massachusetts](#), at 10 Stoneledge Road, Lenox, 01240, to allow BRIDGELOAN’s CCE to have Associate Lehman representing Tavares to covertly con, coerce, deprive, and extort Tavares of properties and rights. At all times, the record shows Lehman is working to extort Tavares of properties and rights.

COUNTS

Count 439 - 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 18 U.S.C. §371.

Count 440 - 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 441 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 442 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 443 – Thomas R. Lehman (“Lehman”) (trl@lkllaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lkllaw.com), Robin Barrera (“Robin Barrera”) (RBarrera@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and Olten Ayres de Abreu Junior (“Abreu Jr.”) (olten@fbt.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings, a certain [E-Mail](#) of April 5, 2011 – to wit: **443 (a) at 12:04 p.m., From Lehman To Abreu Jr., cc Rengstl and Robin Barrera: “Subject: FW [Tavares’ E-mail of April 5, 2011 at 11:26 a.m.] Miami River & Brickell Village One x Bridgeloan et al – Importance: High** [Lehman & LKLS+G have willfully deleted the text of this, and many other E-Mails obtained through discovery in the legal malpractice suit, Charles Tavares, Brickell Village One, LLC, and 2147 SW 8 Street, LLC v. Thomas R. Lehman & Levine Kellogg Lehman Schneider + Grossman, LLP, Related Case No. 2013-12223-CA-40]. Lehman, conspiring to further a brazen scheme depriving and extorting client/victim Charles Tavares of properties and rights, under color of law, upon sham proceedings, vitiated by frauds upon the court, by officers of the court, is in violation of 18 U.S.C. §1343.

Count 444 - At all times relevant, Thomas Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, Olten Ayres de Abreu Junior, Romulo Dantas, Marcos Menezes, Matthew Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., 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, 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 of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 445 – Thomas Ralph Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP, Olten Ayres de Abreu Junior, and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 446 –Thomas Ralph Lehman, Patrick J. Rengstl, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
447	April 5, 2011 at 12:11 P.M.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Robin Barrera LKLS+G, LLP Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf Olten Ayres de Abreu Junior Alan Samuel Fine The Criminal Enterprise (CCE)
448		§ 241 Conspiracy Against Rights &	
449		§ 242 Deprivation of Rights -Under Color of Law &	
450		§ 1346 Scheme/Artifice to Defraud &	
451		§ 1343 Mail Fraud &	
452		§ 1961 <i>et seq.</i> – RICO &	
453		FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices &	
454		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 5, 2011, criminals Thomas R. Lehman (“Lehman”), and Patrick J. Rengstl (“Rengstl”), at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), at all relevant times, conspiring to extort client/victim Charles Tavares (“Tavares”) of properties and rights, in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the Eleventh Judicial Circuit for Miami-Dade County, Florida (“Miami Courts”), vitiated by fraud, falsely, invalidly, and fraudulently, on behalf of Tavares’ Companies Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”), in furtherance of the scheme extorting Tavares of properties and rights, exchange secret E-mails with Alan Samuel Fine (“Fine”), covertly¹⁴⁸ representing Third-Party Defendant – and Tavares’ investor, Romulo Pina Dantas (“Dantas”), and with Dantas’ Swiss/Brazilian attorney, fixer, and “*Money Bay Man*”. Because criminals Lehman, Rengstl, Stumpf, Lopez, Fine, Abreu Jr., *et al.*, know that, among other things, Tavares, and Tavares only, has the sole legal authority over Tavares’ Companies’ Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (“Tavares’ Companies”), and that Tavares has ordered Tavares’ attorneys Lehman, Rengstl, LKLS+G, Stumpf, Lopez, and Black Srebnick not to settle BRIDGELoAN’s sham Case on behalf of Tavares’ Companies, and ordered them to file for Bankruptcy protection to sell one of Tavares’ Two Properties valued over \$50 million securing BRIDGELoAN’s sham \$12 million loan, they systematically, knowingly and intentionally, omit relevant E-mails from client/victim Tavares to further the scheme.

¹⁴⁸ Fine is a longtime Associate, and attorney of BRIDGELoAN’s Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and a Tavares’ former attorney, knowingly and intentionally representing Dantas – and willfully not making a court appearance in the Third-Party Claims by Tavares against Dantas, because Fine is, *inter alia*, in fatal conflict of interest against all parties, and is covertly depriving and extorting Dantas, to further BRIDGELoAN’s schemes upon the subverted Miami Courts.

COUNTS

Count 447 - 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 18 U.S.C. §371.

Count 448 - 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 449 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 450 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 451 –Thomas Lehman (“Lehman”) (trl@lkllaw.com), Patrick Rengstl (“Rengstl”) (pjr@lkllaw.com), Robin Barrera (“Robin Barrera”) (RBarrera@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf (“Stumpf”)(LStumpf@royblack.com), Matthew Paul Leto (“Leto”) (MLeto@hljlaw.com), Olten Ayres de Abreu Junior (“Abreu Jr.”) (olten@fbt.ch), Alan S. Fine (“Fine”) (AFine@fine-law.com), and other Perpetrators implicated, did knowingly and intentionally, to further a criminal scheme, systematically coercing, and extorting Charles Tavares (“Tavares”) of properties and rights, under color of law, upon sham court proceedings, use certain [E-Mails](#) of April 5, 2011 – to wit: **451 (a), at 12:11 p.m., From Lehman To Leto, Abreu Jr., Stumpf, and Lopez, cc Rengstl, and Robin Barrera:** *“Subject: FW: Bridgeloan – Final Judgment of Foreclosure - All, Attached is a proposed Judgment of Foreclosure providing for two sales and two separate credit bids. The boilerplate all caps notice provisions required by Chap. 45 have to be added to paragraphs 6 and 11 but that can be done later. In addition, Charles has asked the judgment include the mortgagor defendants been granted one year options to purchase the properties for the amounts of the credit bids plus interest. **I haven’t spoken to my client about Charles’ proposal** [¹⁴⁹] **so I do not know if mortgagor defendants have a position on Charles’ [Tavares] request.** Larry can provide more details on it. Thomas R. Lehman – LKLS+G”; and,*

¹⁴⁹ At all relevant times, Tavares, and Tavares only, is the [sole legal authority](#) for “mortgagor defendants,” and at all relevant times, [Lehman and LKLS+G are Tavares’ Companies mortgagor defendants’ attorneys](#). Lehman and LKLS+G’s statements show that Lehman and LKLS+G are knowingly and intentionally, under color of law, covertly depriving and extorting client/victim Charles Tavares of properties and rights, to further BRIDGELoAN’s scheme upon the Miami Courts. After Tavares is forwarded Lehman’s sham [E-mail](#) of 12:11 p.m., Tavares [emails](#) Lehman, stating, *inter alia*, “**Tom** [Lehman], --- **I did not understand what you mean by ‘your client’? Sorry for requesting clarifications as I am not really versed in law! Thank you. Charles** [Tavares].

451 (b), at 4:42 p.m., From Lehman To Fine: *“Subject: FW: Bridgeloan – Final Judgment of Foreclosure – Attachments: image.001.gif; EY8424.doc [the E-mail’s text, obtained in discovery on Tavares’ Legal Malpractice suit against Lehman & LKLS+G, Related Case No. 2013-12223-CA-40, has been willfully deleted by Lehman and LKLS+G] LKLS+G”.* Tavares’ corrupt attorneys Lehman, Rengstl, LKLS+G, Stumpf, Lopez, and Black Srebnick, at all times relevant, are conning, conspiring, coercing, depriving, and extorting client/victim Tavares of properties and rights, under color of law, repeatedly disobeying Tavares’ orders, as the sole legal authority for [Tavares’ Companies Defendants](#) Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”), together with reckless BRIDGELoAN’s attorneys Leto, Hall & Lamb, and Abreu Jr., *et al.*, have already secretly and fraudulently *agreed* to a Fraudulent Judgment of \$16.5 million, see secret [E-Mail](#) of March 31, 2011, willfully depriving and extorting Tavares of Tavares’ Two Properties valued in excess of \$50 million dollars to further the scheme extorting Tavares of properties and rights, under color of law in sham proceedings. Because, at all relevant times, [Tavares’ attorneys Lehman, Rengstl, LKLS+G](#), Stumpf, Jared Michael Lopez, and Black Srebnick, know Tavares has ordered them not settle, and instead file for Bankruptcy, and proceed with defenses and counter claims, they secretly fabricate false, invalid and fraudulent Power of Attorneys for Tavares’ Companies’ Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc., to falsely and secretly settle with BRIDGELoAN. Tavares never authorized anyone, nor authorized anyone to authorize, among others, Lehman, Rengstl, LKLS+G, Stumpf, Black Srebnick, Leto, Hall & Lamb, Abreu Jr., and BRIDGELoAN, to ever settle the BRIDGELoAN Case on behalf of Tavares’ Companies BV One, 2147, and MRPM. The Fraudulent *agreed* \$16.5 million Settlement includes false inflated claims of millions of dollars in fabricated *“Default Interest,”* predicated on BRIDGELoAN’s [Joseph Horn’s Two Fraudulent Affidavits](#), that the record shows, and LKLS+G and Black Srebnick know to be fraudulent, containing millions of dollars in falsely inflated claims, and that [BRIDGELoAN acknowledges receiving](#) from Tavares. The Sham *“agreed”* Settlement, predicated on extortion and frauds upon the courts, by officers of the courts, see [E-mails](#), is invalid and fraudulent, forever null and void, furthering a scheme to extort Tavares, in violation of 18 U.S.C. §1343.

Count 452 - At all times relevant, Thomas R. Lehman, Patrick Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornsan & Stumpf, P.A., Olten Ayres de Abreu Junior, Alan Samuel Fine, Romulo Pina Dantas, Marcos Menezes, Matthew P. Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 453 – Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornsan & Stumpf, P.A., Olten Ayres de Abreu Junior, Alan Samuel Fine, Matthew Leto, Hall Lamb and Hall, P.A., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 454 – Thomas Ralph Lehman, Patrick J. Rengstl, Alan Samuel Fine, Larry Allen Stumpf, Jared Michael Lopez, Matthew Leto, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of false, invalid, and fraudulent Power of Attorneys of client/victim Charles Tavares ("Tavares"), to secretly and fraudulently settle the BRIDGELoan Case against client/victim Tavares orders not to settle, systematically omitting relevant facts and the truth from the client/victim Tavares, fabricating false, invalid and fraudulent Power of Attorneys of Tavares' Companies Defendants, sham corporate documents, and systematically furthering a known underlying tax fraud schemes upon the sham court proceedings, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

455	April 6, 2011 at 10:00 A.M.	U. S. CODE TITLE 18	Thomas Ralph Lehman LKLS+G, LLP Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf The Criminal Enterprise (CCE)
456		§ 371 Conspiracy to Defraud the USA &	
457		§ 241 Conspiracy Against Rights &	
458		§ 242 Deprivation of Rights -Under Color of Law &	
459		§ 1346 Scheme/Artifice to Defraud &	
460		§ 1951 Extortion (Hobbs Act) &	
461		§ 1961 <i>et seq.</i> – RICO &	
462	FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)		

On April 6, 2011, at 10:00 a.m., a meeting is held at [Black Srebnick Kornspan & Stumpf’s, P.A.](#) (“BSK&S” or “Black Srebnick”) offices, summoned by client Charles Tavares (“Tavares”). Attending is, Tavares, and Tavares’ attorneys [Larry Allen Stumpf](#) (“Stumpf”) and [Jared Michael Lopez](#) (“Lopez”) at Black Srebnick, and [Thomas R. Lehman](#) (“Lehman”) at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”). As Tavares starts the meeting, Tavares asks Lehman, what Lehman meant when he said, on an [E-mail](#) of April 5, 2011, at 12:11 p.m., that ***“I haven’t spoken to my client about Charles’ proposal so I do not know if mortgagor defendants have a position on Charles’ [Tavares] request.”***¹⁵⁰ *Thomas R. Lehman – LKLS+G,*” because, since Tavares first [hired Lehman in 2005 to represent Tavares’ Companies](#), and, [at all relevant times](#), Tavares, and Tavares only has [sole legal authority of Tavares’ Companies Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Marina, Inc.](#) (“Tavares’ Companies” or “mortgagor defendants”). Lehman, exposed taking orders from an “unknown secret client” – that has corrupted Lehman and LKLS+G, to coerce, deprive, and extort Tavares of properties and rights, replies, that, “Rojas [¹⁵¹] told Lehman that somebody else had legal authority of Tavares’ Companies.” Tavares shocked, states that Lehman knows, the truth, and [all records](#) show that client Tavares has sole legal authority of “mortgagor defendants.” Lehman, exposed, leaves the meeting. Stumpf, falsely playing good cop,¹⁵² states: ***“Lehman is bought.” “Charles, this is a Criminal Enterprise”, “There is nothing I can do for you”, “I wish I was in the case six months ago.”*** Tavares, stunned, wonders what kind of *Criminal Enterprise* is so powerful to totally cower and render Black Srebnick powerless to defend their client

¹⁵⁰ Lehman, LKLS+G, Stumpf, Lopez, and Black Srebnick represent Tavares, and Tavares’ Companies in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, by officers of the court, furthering BRIDGELoAN’s schemes.

¹⁵¹ [Marco Emilio Rojas](#) (“Rojas”), introduced Lehman to Tavares in 2005, and unknown to Tavares at the time, Rojas and Lehman are Associates of BRIDGELoAN’s Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”).

Tavares. Tavares, at the time, still not knowing that Tavares' attorneys are corrupted into the scheme extorting Tavares, believing and trusting¹⁵³ Stumpf, Lopez, and Black Srebnick, leaves Black Srebnick's offices stunned with the day's sordid revelations. As Lehman is exposed, the record shows that, *inter alia*, as part of the scheme to extort Tavares of properties and rights, under color of law, Lehman, with wife [Amy Lehman](#), befriend Tavares, and Tavares family for years, to gain Tavares' trust, to covertly con, coerce, deprive and extort Tavares. Because Lehman & LKLS+G are corrupted, they disobey Tavares' orders to file for Bankruptcy Protection to save over \$50 million dollars in equity from Tavares' Two Properties – and the reason Tavares hired Lehman, which is to file Bankruptcy Protection for Tavares' Companies, in an “*unique situation*” - as stated by Lehman in 2008, since Tavares' Companies/ mortgagor defendants, hold two valuable and desirable properties, the *Brickell Buildings*, and the *9 Acres Miami River Marina*, valued over \$50 million dollars, since Tavares could sell one of Tavares' properties, paying off the Sham \$12 million dollars BRIDGELoAN-[BNY Mellon](#) loan, preserving millions of dollars in excess equity from the sale of one property, and keeping the second property free and clear. Lehman & LKLS+G, at all times, conspire to, *inter alia*, selling out to client Tavares' opposing parties, fabricating false, invalid, and fraudulent Power of Attorneys of Tavares' Companies' Defendants to secretly and fraudulently *agree* – without authority, to an “*agreed*” settlement, covertly acting against Tavares and Tavares' Companies Defendants, fabricating bogus appraisals with Lehman's Appraiser Andrew Magenheimer, interfering with buyers of Tavares' properties, to further the criminal scheme depriving and extorting, *inter alia*, U.S. citizen Tavares of properties and rights, and the United States, and the State of Florida of, *inter alia*, honest services upon courts, and upon exposed, shameless Lehman, LKLS+G, *et al.*, systematically continues coercing and extorting Tavares, under color of law.

¹⁵² The record obtained through discovery in August 2013, in the Related Legal Malpractice and Fraud Case by Tavares against Lehman and LKLS+G, *Charles Tavares, Brickell Village One, LLC and 2147 SW 8 Street, LLC v. Thomas Ralph Lehman and Levine Kellogg Lehman Schneider + Grossman, LLP* (“Lehman & LKLS+G Case”), Case No.:2013-12223-CA-40, shows that, at all relevant times, Stumpf, Lopez, and Black Srebnick are conspiring, jointly and together, with Lehman, [Olten Ayres de Abreu Junior](#) (“Abreu Jr.”) a.k.a. “The Money Bag Man” for Third-Party Defendant Romulo Pina Dantas (“Dantas”) and Marco Jose Bezerra de Menezes (“Menezes”), and BRIDGELoAN, to covertly con, coerce, threaten, deprive, steal, and extort Tavares of properties and rights, under color of law, upon subverted proceedings in the Miami Courts, while charging over \$111,000 in false legal bills, for about three (3) months of Sham Legal work, knowingly and intentionally, to extort client/victim Tavares under color of law.

¹⁵³ At all relevant times, until discovery in the Lehman & LKLS+G Case, Tavares believed and trusted his attorneys Stumpf, Lopez, and Black Srebnick. Stumpf, falsely playing to be effective and aggressive in front of client/victim Tavares – for example, in interviewing in March 2011, BRIDGELoAN's Associate Paulo Henrique Tavares de Melo (“Paulo Melo”) at Integra Solutions, LLC, a Florida L.L.C.'s (“INTEGRA”), at 2828 Coral Way, Suite 303, Miami, Florida 33145, while, on Tavares' back, allowing, and covertly participating in the ongoing extortion of Tavares, willfully failing to prepare proper defenses in the BRIDGELoAN Case, filing a sham “Tavares' Amended Counter Claim,” after getting Tavares' former co-counsels at Homer & Bonner's **Microsoft Word** version of Tavares' initial “Counter Claims” so Black Srebnick could edit the Initial Counter Claim, filing the sham Amended Counter Claim, charging Tavares thousand of dollars in sham billings, knowingly and intentionally agreeing to a false, invalid and fraudulent \$16.5 million dollars Final Judgment against client Tavares, including millions of dollars in patently fraudulent inflated “Default Interest” claimed by [BRIDGELoAN's Joseph Horn's Two Fraudulent Sworn Affidavits](#), and upon “*knowing*,” on April 6, 2011 at 10:00 a.m., that Tavares' Co-Counsel “**Lehman is Bought**,” willfully fails to, *inter alia*, notify the Miami Courts in a Motion, the FBI, and, demand Lehman and LKLS+G to withdraw from representing Tavares' Companies Defendants. Instead, Tavares' attorneys Black Srebnick, systematically continues extorting Tavares of honest services and moneys, in furtherance of the underlying extortion of Tavares' Properties and rights valued at the time, over \$50 million dollars, and now, valued over \$150 million dollars. Tavares, unsuspecting, and trusting Stumpf, had, for example, upon Stumpf mentioning to Tavares that he would love to have a jersey autographed by Brazilian soccer player [Pelé](#) (“Edson Arantes do Nascimento”), Tavares had [Pelé](#) personally autograph a soccer jersey “*from Pelé to Larry*,” while Larry Stumpf is despicably and systematically conning, coercing, threatening, depriving and extorting Tavares of properties and rights, under color of law.

COUNTS

Count 455 - 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 18 U.S.C. §371.

Count 456 - 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 457 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 458 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 459 - Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a "*Money Bag Man*", for Romulo Pina Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [makes threats to Tavares and Tavares' family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under the powers of BRIDGELoAN's Criminal Enterprise, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 460 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), 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, perjury, mail and wire frauds, bank frauds, securities

frauds, crimes against the United States of America, 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 of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 461 – Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices); and, **461(a)** Systematically, and repeatedly, intimidating, coercing, threatening, and extorting client/victim Charles Tavares (“Tavares”) to prevent Tavares from fighting the ongoing scheme depriving and extorting Tavares of properties and rights, in sham proceedings upon the Miami Courts, by, among others, officers of the court, in violation of, Title XLVI § 836.05, Florida Statutes (Threats & Extortion).

Count 462 –Thomas Ralph Lehman, Patrick J. Rengstl, Larry Allen Stumpf, Jared Michael Lopez, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

463	April 6, 2011 at 12:33 P.M. and at 2:46 P.M.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights -Under Color of Law & § 1346 Scheme/Artifice to Defraud & § 1343 Wire Fraud & § 1961 <i>et seq.</i> – RICO & FLORIDA STATUTES TITLE XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Thomas Ralph Lehman Patrick J. Rengstl Robbin Barrera LKLS+G, LLP Olten Ayres de Abreu Junior Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf The Criminal Enterprise (CCE)
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On April 6, 2011, at 12:33 p.m., Charles Tavares’ (“Tavares”) corrupted attorneys, [Thomas R. Lehman](#) (“Lehman”), Patrick J. Rengstl (“Rengstl”), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), replying to Tavares’ [E-mail](#)¹⁵⁴ of April 6, 2011, at 11:40 a.m., in which Tavares reasserts the truth and the record displayed, that Lehman, *et al.*, all know, that Tavares, and Tavares only, has [sole legal authority of Tavares’ Companies Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (“Tavares’ Companies” or “*mortgagor defendants*”), following Lehman’s submission of patently false, invalid and fraudulent Power of Attorneys (“Sham POAs”) for Tavares’ Companies, see [E-mail](#) of April 6, 2011, at 11:05 a.m., unashamed and unrepentant, after exposed, at a meeting, for “**being bought**” by opposing parties, perpetrating crimes against client Tavares, continues the scheme to extort Tavares of properties and rights, under color of law, in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud. Lehman, furthering the extortion, falsely states, that: “Charles [Tavares] and Larry [Stumpf], Trial of Bridgeloan’s foreclosure case is specially set for Friday morning [April 8, 2011] at 9. --- Rather than engage in a debate over whether you [Tavares], Olten [Olten Ayres de Abreu Junior, “The Money Bag Man”] or anyone else has authority to instruct me, as attorney for the foregoing defendant mortgagor companies [Tavares’ Companies], on settlement negotiations in a case are certain to lose, I suggest to work together to negotiate an agreed judgment of foreclosure.” Tavares’ co-counsels Black Srebnick Kornspan & Stumpf, P.A., at all times relevant, corrupted, willfully fails to stop the extortion.

¹⁵⁴ Lehman’s false statements to coerce and extort client Tavares that, *inter alia*, it does not matter that Lehman is following orders from opposing parties, and disobeying client Tavares’ orders, is totally preposterous, showing an evil unrepentant state of mind from corrupt Lehman. Indeed, with Lehman & LKLS+G’s fraudulent representation, there was never proper litigation, only sham proceedings by corrupt officers of the court, *inter alia*, Lehman, Rengstl, Stumpf, Jared M. Lopez, Matthew P. Leto, *et al.*, at all relevant times, using the Miami Courts to systematically extort Tavares of properties and rights, under color of law.

COUNTS

Count 463 - 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 18 U.S.C. §371.

Count 464 - 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 465 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 466 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 467 - Thomas R. Lehman ("Lehman") (trl@lkllaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lkllaw.com), Robin Barrera ("Robin Barrera") (RBarrera@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Jared Michael Lopez ("Lopez") (JLopez@royblack@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("BSK&S" or "Black Srebnick"), Olten Ayres de Abreu Junior ("Abreu Jr.") (olten@fht.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares ("Tavares") (ctavares@bellsouth.net) of properties and rights upon sham court proceedings, certain E-mails of April 6, 2011 – to wit: **467 (a) E-mail at 12:33 p.m., From Lehman To Tavares, Stumpf, Lopez, cc Abreu Jr., Rengstl and Robin Barrera:** *"Subject: RE: Powers of Attorney attached for Hilo Hattie Investments Inc. & The Venetian Isles Holdings, Inc. to Olten Abreu Ayres Junior [sic] - Charles [Tavares] and Larry [Stumpf], Trial of Bridgeloan's foreclosure case is specially set for Friday morning [April 8, 2011] at 9. --- Rather than engage in a debate over whether you [Tavares], Olten [Olten Ayres de Abreu Junior a.k.a. "The Money Bag Man"] or anyone else has authority to instruct me, as attorney for the foregoing defendant mortgagor companies [Tavares' Companies], on settlement negotiations in a case are certain to lose, I suggest to work together to negotiate an agreed judgment of foreclosure... Thomas R. Lehman – Partner LKLS+G";* and **467 (b) E-mail at 2:46 p.m., From Abreu Jr. to Lehman, cc Rengstl and Robin Barrera:** *"Text Deleted"*. Lehman & LKLS+G have willfully deleted the text of this, and many other E-Mails obtained through discovery in the legal malpractice suit, Charles Tavares, Brickell Village One, LLC, and 2147 SW 8 Street, LLC v. Thomas R. Lehman & Levine Kellogg Lehman Schneider + Grossman, LLP, Related Case No. 2013-12223-CA-40], to further the scheme extorting Tavares of properties and rights, is in violation of 18 U.S.C. §1343.

Count 468 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a “*Money Bag Man*”, for Romulo Pina Dantas and Marcos Menezes, Matthew Paul Leto, Hall Lamb and Hall, P.A., 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 making false statements and pleadings, forgery, fabricating and filing false documents and Sham 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, [Tavares Sworn Affidavit](#).

Count 469 – Thomas Ralph Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices); and, **469(a)** Systematically, and repeatedly, intimidating, coercing, threatening, and extorting client/victim Charles Tavares (“Tavares”) to prevent Tavares from fighting the ongoing scheme depriving and extorting Tavares of properties and rights, in sham proceedings upon the Miami Courts, by, among others, officers of the court, in violation of, Title XLVI § 836.05, Florida Statutes (Threats & Extortion).

Count 470 – Thomas Ralph Lehman, Patrick J. Rengstl, Larry Allen Stumpf, Jared Michael Lopez, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

471	April 7, 2011 at 9:42 A.M. and 9:46 A.M.	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights -Under Color of Law & § 1346 Scheme/Artifice to Defraud & § 1343 Wire Fraud & § 1951 Extortion (Hobbs Act) & § 1961 <i>et seq.</i> – RICO & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf The Criminal Enterprise (CCE)
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On April 7, 2011, Charles Tavares’ (“Tavares”) corrupt¹⁵⁵ attorneys Larry A. Stumpf (“Stumpf”), [Jared Michael Lopez](#) (“Lopez”), [Black Srebnick Kornspan & Stumpf’s, P.A.](#) (“Black Srebnick” or BSK&S”), and [Thomas R. Lehman](#) (“Lehman”), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), at all relevant times, [fraudulently representing Tavares individually, and Tavares’ Companies’ Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Park Marina, Inc. (“[Tavares’ Companies](#)” or “Mortgagor Companies”), covertly furthering an underlying scheme to deprive and extort Tavares of properties and rights in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, exchange, to further the scheme, sham [E-mails](#) pertaining to a sham [agreed](#) Final Judgment of Foreclosure, secretly [agreed](#) by the Perpetrators to deprive Tavares of Tavares’ [Two Properties valued over \\$50 million dollars](#), securing a sham \$12 million dollars BRIDGELOAN/[BNY Mellon](#) loan, without Tavares knowledge, or consent as the sole legal authority for Tavares’ Companies. At all times, the Perpetrators are willfully extorting client Tavares.

¹⁵⁵ In a meeting of April 7, 2011, at 10:00 a.m., at Black Srebnick’s offices, summoning Tavares’ attorneys, and attended by Tavares, Stumpf, Lopez, and Lehman at LKLS+G, to prepare for defenses, *inter alia*, Bankruptcy filing to protect over \$50 million dollars of Tavares’ Companies, allowing Tavares to sell one of the properties to pay off BRIDGELOAN’s sham \$12 million dollars loan, preserving excess equity, and allowing Tavares to keep Tavares’ second property free & clear, Lehman is exposed secretly working to defraud and extort client Tavares, by, *inter alia*, [secretly fabricating patently false, invalid, and fraudulent Power of Attorneys](#) of Tavares’ Companies to secretly settle the case against client Tavares’ express orders not to settle, and instead, to file for Bankruptcy. The record shows that, at all relevant times, Lehman, LKLS+G, Stumpf, Lopez, Black Srebnick, are jointly conspiring with Third-Party Defendant [Romulo Pina Dantas](#)’ agent [Olten Ayres de Abreu Junior](#), BRIDGELOAN, and its attorney [Matthew P. Leto](#), to further the scheme extorting Tavares. Stumpf, Lopez & Black Srebnick playing *good cop*, at the meeting, states, “*Lehman is bought*”, “*Charles, this is a Criminal Enterprise*”, “*There is nothing I can do for you*”, “*I wish I was in the case six months ago,*” when in truth and in fact, were not Stumpf, Lopez, and Black Srebnick totally corrupted into the scheme extorting [client/victim](#) Tavares, they could, and should, *inter alia*, expose the scheme to the Miami Courts, to the FBI, and other parties, and properly defend Black Srebnick’s client Tavares, preserving Tavares’ properties, rights, and the rule of law.

COUNTS

Count 471 - 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 472 - 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 473 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 474 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 475 - Thomas R. Lehman ("Lehman") (tr@lklaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Jared Michael Lopez ("Lopez") (JLopez@royblack@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("BSK&S" or "Black Srebnick"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares ("Tavares") (ctavares@bellsouth.net) of properties and rights upon sham court proceedings, certain E-mails of April 7, 2011 – to wit: **475 (a) E-mail at 9:42 a.m., From Stumpf To Lehman, cc Lopez:** *"Subject: Re: FW: FW: Bridgeloan – Final Judgment of Foreclosure – Tom [Lehman] – Based on the recent flow of emails, I understand that the following is where we now stand --- 1. Bridgeloan has rejected to [sic] request for an option, 2. Bridgeloan is 'considering' the request for language in the judgment waiving deficiency judgment (in our view, Bridgeloan has previously agreed to 'no deficiency' re: Charles [Tavares], and 3. If testimony re the 'two sales' issue is needed tomorrow, it will come from the appraiser Please let me know how can I help get this (an agreed, satisfactory form of judgment) completed today and if the above is not accurate. Thanks Larry A. Stumpf, Esq."* **475 (b) E-mail at 9:46 a.m., From Lehman to Stumpf, , cc Lopez and Rengstl:** *"Subject: Re: FW: FW: Bridgeloan – Final Judgment of Foreclosure – **Accurate but looks like settled so no appraiser needed. Thomas R. Lehman**".* Tavares' corrupt attorneys, at all relevant times, conspiring to defraud Tavares of properties and rights, under color of law, shamelessly continue, even after Lehman is exposed, on April 6, 2011, fabricating and using false, invalid, and fraudulent Power of Attorneys of client Tavares' Companies Defendants to secretly and fraudulently agree to a sham settlement with BRIDGELoAN to extort Tavares of Two Properties valued in excess of \$50 million dollars, continue the scheme to extort client/victim

Tavares. Stumpf, Lopez, and Black Srebnick, knowing that, among other things, that Tavares' Companies Defendants' attorney "**Lehman is bought**", and that Bridgeloan Investors, Inc. is a sham lender used by a Transnational Continued Criminal Enterprise to deprive and extort, "**Charles, this is a Criminal Enterprise**", falsely stating that Stumpf and Black Srebnick cannot protect and defend client Tavares from the Criminal Enterprise, "**There is nothing I can do for you**", shamelessly coerces and extorts client Tavares, "**I wish I was in the case six months ago.**" Stumpf, Lopez, Lehman, Rengstl, and LKLS+G's emails, furthering the scheme extorting client/victim Tavares, is in violation of Title 18, U.S.C. §1343 (Wire Fraud).

Count 476 - Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a "**Money Bag Man**", for Romulo Pina Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares' family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under powers of BRIDGELoAN's Criminal Enterprise, in violation of Title 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 477 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), 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, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States of America, 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 of America, and systematic violations of rights, contrary to Title 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 478 –[Thomas R. Lehman](#), [Patrick J. Rengstl](#), [Larry Stumpf](#), [Jared M. Lopez](#), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

479	April 7, 2011 at 1:11 P.M.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights -Under Color of Law & § 1346 Scheme/Artifice to Defraud & § 1343 Wire Fraud & § 1951 Extortion (Hobbs Act) & § 1961 <i>et seq.</i> – RICO & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf The Criminal Enterprise (CCE)
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On April 7, 2011, Charles Tavares’ (“Tavares”) corrupt attorneys Larry A. Stumpf (“Stumpf”), [Jared Michael Lopez](#) (“Lopez”), [Black Srebnick Kornspan & Stumpf’s, P.A.](#) (“Black Srebnick” or BSK&S”), at all relevant times, conspiring, jointly and together with, *inter alia*, Tavares’ co-counsels Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), to further a scheme depriving and extorting Tavares of properties and rights in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, shamelessly continuing to coerce and extort Tavares to capitulate to the scheme, [E-mails](#) client Tavares, falsely state, *e.g.*, “Charles – as we have discussed (and exchanged emails about) several times, we see no method by which a ‘stay’ of the resolution of this case by the entry of a foreclosure judgment tomorrow can be delayed. At the risk of being repetitious, but to confirm our many prior discussions, the situation in which you now find yourself results from activity (or the lack of activity) in this case well before we were retained in February.” Stumpf and Black Srebnick know that, *inter alia*, the *agreed* settlement is invalid and fraudulent, and is predicated on fraudulent Power of Attorneys of Tavares’ Companies’ Defendants, fabricated, and secretly used by LKLS+G to extort Tavares. Stumpf and Black Srebnick also know that Bridgeloan Investors, Inc. (“BRIDGELOAN”) is a sham lender used by Joseph Horn’s Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and that the sham proceedings are being used to extort Tavares, under color of law. Tavares, at the time, still believing and trusting Tavares’ attorneys Stumpf and Black Srebnick, in shock upon learning that Tavares’ co-counsels at LKLS+G are **bought** and extorting Tavares, replies, *inter alia*, “**Larry – Again, I will not accept giving any rights to pursue these criminals thereafter in lieu of an agreement tomorrow or ever**”, after Stumpf, on April 6, 2011, told Tavares that Tavares is victim of a powerful Criminal Enterprise, and that Black Srebnick cannot do anything to defend client Tavares from. In August 2013, in the Related Case *Tavares v. Lehman & LKLS+G*, Case No.2013-12223-CA-40, Tavares found out that Stumpf and Black Srebnick were also **criminals**, using their Bar licenses to systematically con, coerce, deprive, and extort Tavares.

COUNTS

Count 479 - 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 480 - 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 481 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 482 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 483 - Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Jared Michael Lopez ("Lopez") (JLopez@royblack@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("BSK&S" or "Black Srebnick"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme coercing, and extorting Charles Tavares ("Tavares") (ctavares@bellsouth.net) of properties and rights upon sham court proceedings, certain [E-mails](#) of April 7, 2011 – to wit: **483 (a) E-Mail at 1:11 p.m., From Stumpf To Tavares, cc Lopez:** *"Subject: Bridgeloan – Final Judgment of Foreclosure – "Charles – as we have discussed (and exchanged emails about) several times, we see no method by which a 'stay' of the resolution of this case by the entry of a foreclosure judgment tomorrow can be delayed. At the risk of being repetitious, but to confirm our many prior discussions, the situation in which you now find yourself results from activity (or the lack of activity) in this case well before we were retained in February":* and **483 (b) E-Mail at 1:58 p.m., From Tavares to Stumpf, cc Lopez:** *"Subject: Re: Bridgeloan – Final Judgment of Foreclosure – Larry [Stumpf], Thank you for the email below and I do understand the circumstances and the fact, unfortunately or fortunately, as this criminal organization continued [sic] their fraud scheme, leaving every day that goes by, more and more irrefutable evidence showing this is an organized crime type of enterprise, operating at their free will, it is what it is now and I do appreciate your help. Having said that, and also don't wanting to be repetitive, I do not and I will not accept relinquishing nor giving up my rights to pursue claims against Bridgeloan Investors and its agents and associates. This, I shall make myself very clear and specific and I do ask you to please rely [sic] that to Tom Lehman, which is representing Miami River Park Marina, Inc., Brickell Village One, LLC and 2147 SW 8 Street, in which I am the duly authorized officer for these entities, even if that means no agreed judgment or release of my personal guaranty and so forth.*

*As for the \$2 M offer, as you know, my appraised interest and equity on BV One is about \$2,850,000 plus my bloody sweat equity and I rather lose all than be a corroborator on this Criminal Organizations scheme. We need to play hard ball with these criminals and I do believe we do not need more time to gather evidence, but just present the evidences tomorrow to the Honorable Lester [Judge Allan Lester Langer], as these new evidence of fraud and so forth have been completely documented as of today. Again, I will not accept giving up my rights to pursue these criminals thereafter in lieu of an agreement tomorrow or ever. Thank you and please relate that to Tom Lehman in legal terms as he mentioned to us that 'he has another client, other than me' [Client Tavares]! Charles" [Tavares]. Tavares' corrupt attorneys Stumpf, Lopez and Black Srebnick Kornspan & Stumpf, P.A., at all relevant times, conspiring to coerce and extort the unsuspecting client/victim Tavares of properties and rights, under color of law, shamelessly continue, even after Lehman is exposed, on April 6, 2011, fabricating and using false, invalid, and fraudulent Power of Attorneys of client Tavares' Companies Defendants to secretly and fraudulently agree to a sham settlement with BRIDGELoAN to extort Tavares of Two Properties valued in excess of \$50 million dollars, continue the scheme to extort client/victim Tavares. Stumpf, Lopez, and Black Srebnick, knowing that, among other things, that Tavares' Companies Defendants' attorney "**Lehman is bought**", and that Bridgeloan Investors, Inc. is a sham lender used by a Transnational Continued Criminal Enterprise, "**Charles, this is a Criminal Enterprise**", falsely stating that Stumpf and Black Srebnick cannot protect and defend client Tavares from the Criminal Enterprise, "**There is nothing I can do for you**", shamelessly coerces and extorts client Tavares, "**I wish I was in the case six months ago.**" Stumpf, Lopez, Black Srebnick Kornspan & Stumpf, P.A.'s emails, furthering the scheme extorting client Tavares, is in violation of Title 18, U.S.C. §1343 (Wire Fraud).*

Count 484 - Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a "*Money Bag Man*", for Romulo Pina Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares' family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under powers of BRIDGELoAN's Criminal Enterprise, in violation of Title 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 485 - At all times relevant, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A., 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, 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 486 – [Larry Stumpf](#), [Jared M. Lopez](#), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

487	April 7, 2011 at 3:03 P.M.	<u>U. S. CODE TITLE 18</u>	Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Alan Samuel Fine The Criminal Enterprise (CCE)
488		§ 371 Conspiracy to Defraud the USA &	
489		§ 241 Conspiracy Against Rights &	
490		§ 242 Deprivation of Rights -Under Color of Law &	
491		§ 1346 Scheme/Artifice to Defraud &	
492		§ 1343 Wire Fraud &	
493		§ 1951 Extortion (Hobbs Act) &	
494		§ 1961 <i>et seq.</i> – RICO &	
		Florida Bar Rules of Professional Conduct	
		Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 7, 2011, Charles Tavares’ (“Tavares”) corrupt attorneys [Thomas R. Lehman](#) (“Lehman”), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), at all relevant times, [fraudulently representing Tavares individually, and Tavares’ Companies’ Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Park Marina, Inc. (“[Tavares’ Companies](#)” or “Mortgagor Companies”), covertly furthering an underlying scheme to deprive and extort Tavares of properties and rights in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, to further the scheme, exchange a sham E-mail, secretly forwarding client Tavares’ [E-mail](#) of April 7, 2011 at 2:35 p.m., to Alan Samuel Fine¹⁵⁶ (“Fine”) relating to client Tavares’ statements, as the sole legal authority for Tavares’ Companies Defendants, relating to any sham [agreed](#) Final Judgment of Foreclosure, secretly and fraudulently [agreed](#) by the Perpetrators, without authority, to deprive Tavares of Tavares’ [Two Properties valued over \\$50 million dollars](#), securing a sham \$12 million BRIDGELOAN/[BNY Mellon](#) loan, without Tavares knowledge, or consent as the sole legal authority for Tavares’ Companies. At all times, the Perpetrators are knowingly and intentionally conspiring, jointly and together with BRIDGELOAN’s Criminal Enterprise to covertly coerce, deprive and extort Tavares of properties and rights, under color of law, upon sham proceedings, vitiated by fraud upon the court by officers of the courts.

¹⁵⁶ Fine is a longtime [Associate, and attorney](#) of BRIDGELOAN’s Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and a [Tavares’ former attorney](#), knowingly and intentionally representing Dantas – and willfully not making a court appearance in the Third-Party Claims by Tavares against Dantas, because Fine is, *inter alia*, in fatal conflict of interest against all parties, and is covertly depriving and extorting Dantas, to further BRIDGELOAN’s schemes upon the subverted Miami Courts.

COUNTS

Count 487 - 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 488 - 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 489 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 490 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 491 - Thomas R. Lehman (“Lehman”) (trl@lkllaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Alan Samuel Fine (“Fine”) (AFine@fine-law.com), Larry Allen Stumpf (“Stumpf”) (LStumpf@royblack.com), Jared Michael Lopez (“Lopez”) (JLopez@royblack.com), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares (“Tavares”) (ctavares@bellsouth.net) of properties and rights upon sham court proceedings, certain E-mails of April 7, 2011 – to wit: **491 (a) E-mail at 3:03 p.m., From Lehman To Fine:** “Subject: FW: Bridgeloan Investors x Brickell Village One LLC, Miami River Park Marina, Inc., 2147 SW 8 Street LLC & Charles Tavares, personally - [Lehman and LKLS+G, have willfully deleted, in discovery obtained, the text of this, and many other sham E-mails, furthering Tavares’ extortion] *Thomas R. Lehman, Partner LKLS+G:* **491 (b) E-mail 2:34 p.m., From Tavares To Lehman, Stumpf, Lopez and Rengstl:** “Subject: Bridgeloan Investors x Brickell Village One LLC, Miami River Park Marina, Inc., 2147 SW 8 Street LLC & Charles Tavares, personally - Tom [Lehman], Good afternoon. I just would like to confirm on behalf of the corporations and myself, that I will not accept nor authorize you or anyone else, to relinquish our rights to pursue lenders and other parties relating to this suit. Therefore, any proposed agreement should reflect that as this is paramount and a non-negotiable issue. Please let me know if you have any questions in regards to this and other issues. Also, please send me any drafts as I want to review them before we agreed or execute it. Thank you. Charles Tavares, as President & Director of Miami River Park Marina, Inc. – Charles Tavares, as Managing Partner for Brickell Village One, LLC and President for its associated companies – Charles Tavares, as Managing Partner for 2147 SW 8 Street, LLC – Charles Tavares, Personally”; **491 (c) E-mail 3:31 p.m., From Lehman To Fine:** “Subject: FW: Powers of Attorney

attached for Hillo Hattie Investments Inc. & The Venetian Isles Holdings, Inc. [sic] to Olten Abreu Ayres Junior [sic] – Attachments: Image001.gif [Text has been deleted by Lehman and LKLS+G upon providing discovery in the legal malpractice and fraud suit by Tavares, et al. v. Lehman and LKLS+G] LKLS+G”. Tavares’ corrupt attorneys Lehman, Patrick J. Rengstl, LKLS+G, at all relevant times, conspiring to defraud the unsuspecting client/victim Tavares of properties and rights, under color of law, shamelessly continue, even after Lehman is exposed, on April 6, 2011, fabricating and using false, invalid, and fraudulent Power of Attorneys of client Tavares’ Companies Defendants to secretly and fraudulently agree to a sham settlement with BRIDGELoan to extort Tavares of Two Properties valued in excess of \$50 million dollars, continue the scheme to extort client/victim Tavares. Tavares’ co-counsel, Stumpf, Lopez, and Black Srebnick, knowing that, among other things, that Tavares’ Companies Defendants’ attorney **“Lehman is bought”**, and that Bridgeloan Investors, Inc. is a sham lender used by a Transnational Continued Criminal Enterprise, **“Charles, this is a Criminal Enterprise”**, falsely states that Stumpf and Black Srebnick cannot protect and defend client Tavares from the Criminal Enterprise, **“There is nothing I can do for you”**, shamelessly coerces and extorts client Tavares, **“I wish I was in the case six months ago.”** Lehman, LKLS+G, and Fine emails, furthering the scheme extorting client Tavares, is in violation of Title 18, U.S.C. §1343 (Wire Fraud).

Count 492 - Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a **“Money Bag Man”**, for Romulo Pina Dantas and Marcos Menezes, Alan Samuel Fine, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [makes threats to Tavares and Tavares’ family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under the powers of BRIDGELoan’s Criminal Enterprise, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 493 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Alan Samuel Fine, 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, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States of America, 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 of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

Count 494 –Thomas Ralph Lehman, Patrick J. Rengstl, Larry Allen Stumpf, Jared Michael Lopez, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

495	April 7, 2011 at 3:23 P.M.	<u>U. S. CODE TITLE 18</u>	Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP The Criminal Enterprise (CCE)
496		§ 371 Conspiracy to Defraud the USA &	
497		§ 241 Conspiracy Against Rights &	
498		§ 242 Deprivation of Rights -Under Color of Law &	
499		§ 1346 Scheme/Artifice to Defraud &	
500		§ 1343 Wire Fraud &	
501		§ 1951 Extortion (Hobbs Act) &	
502		§ 1961 <i>et seq.</i> – RICO &	
		Florida Bar Rules of Professional Conduct	
		Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 7, 2011, Charles Tavares’ (“Tavares”) corrupt attorneys [Thomas R. Lehman](#) (“Lehman”), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), at all relevant times, [fraudulently representing Tavares individually, and Tavares’ Companies’ Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Park Marina, Inc. (“[Tavares’ Companies](#)” or “Mortgagor Companies”), covertly furthering an underlying scheme to deprive and extort Tavares of properties and rights in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, to further the scheme, submits a sham [E-mail](#) of April 7, 2011 at 3:23 p.m. to client Tavares, replying to Tavares [E-mail](#) relating to client Tavares’ statements, as the sole legal authority for Tavares’ Companies Defendants, relating to any sham [agreed](#) Final Judgment of Foreclosure, secretly *agreed* by the Perpetrators to deprive Tavares of Tavares’ [Two Properties valued over \\$50 million dollars](#), securing a sham \$12 million BRIDGELoAN/[BNY Mellon](#) loan, without Tavares knowledge, or consent as the sole legal authority for Tavares’ Companies. Lehman, continuing to con, coerce, deprive, and extort [client](#)/victim Tavares of properties and rights, under color of law, falsely stating, in the E-mail: “Charles [Tavares], *While I do not agree with all of the statements contained in your email below* [Tavares’ E-mail of April 7, 2011 at 2:34 p.m.], *if you want to maintain the defenses to Bridgeloan’s claims, you must come to testify at the trial tomorrow [April 8, 2011] morning on your knowledge of the facts which support defenses. Will you appear and testify?* Thomas R. Lehman, Partner LKLS+G.” Lehman and LKLS+G, shamelessly, after being exposed on a meeting of April 6, 2011 at 10:00 a.m., fraudulently agreeing to settle the BRIDGELoAN Case against Tavares’ orders not to settle, and producing patently fabricated false, invalid, and fraudulent Power of Attorneys of Tavares’ Companies, unrepentant, continues, together with Tavares’ co-counsels Larry A. Stump, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A., and other Perpetrators implicated, with the brazen scheme coercing, depriving and extorting client Tavares of properties and rights, under color of law, upon a court of law.

COUNTS

Count 495 - 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 496 - 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 497 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 498 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 499 - Thomas R. Lehman ("Lehman") (trl@lkllaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Alan Samuel Fine ("Fine") (AFine@fine-law.com), Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Jared Michael Lopez ("Lopez") (JLopez@royblack.com), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares ("Tavares") (ctavares@bellsouth.net) of properties and rights upon sham court proceedings, certain E-mails of April 7, 2011 – to wit: **499 (a) E-mail at 3:23 p.m., From Lehman To Fine:** *"Subject: Bridgeloan Investors x Brickell Village One LLC, Miami River Park Marina, Inc., 2147 SW 8 Street LLC & Charles Tavares, personally - "Charles [Tavares], While I do not agree with all of the statements contained in your email below [Tavares' E-mail of April 7, 2011 at 2:34 p.m.], if you want to maintain the defenses to Bridgeloan's claims, you must come to testify at the trial tomorrow [April 8, 2011] morning on your knowledge of the facts which support defenses. Will you appear and testify? Thomas R. Lehman, Partner LKLS+G."* **499 (b) E-mail 2:34 p.m., From Tavares To Lehman, Stumpf, Lopez and Rengstl:** *"Subject: Bridgeloan Investors x Brickell Village One LLC, Miami River Park Marina, Inc., 2147 SW 8 Street LLC & Charles Tavares, personally - Tom [Lehman], Good afternoon. I just would like to confirm on behalf of the corporations and myself, that I will not accept nor authorize you or anyone else, to relinquish our rights to pursue lenders and other parties relating to this suit. Therefore, any proposed agreement should reflect that as this is paramount and a non-negotiable issue. Please let me know if you have any questions in regards to this and other issues. Also, please send me any drafts as I want to review them before we agreed or execute it. Thank you. Charles Tavares, as President & Director of Miami River Park Marina, Inc. – Charles Tavares, as Managing Partner for Brickell Village One, LLC and President for its*

associated companies – Charles Tavares, as Managing Partner for 2147 SW 8 Street, LLC – Charles Tavares, Personally.” Tavares’ corrupt attorneys Lehman, LKLS+G, at all relevant times, conspiring to defraud the unsuspecting client/victim Tavares of properties and rights, under color of law, shamelessly continue, even after Lehman is exposed, on April 6, 2011, fabricating and using false, invalid, and fraudulent Power of Attorneys of client Tavares’ Companies Defendants to secretly and fraudulently agree to a sham settlement with BRIDGELOAN to extort Tavares of Two Properties valued in excess of \$50 million dollars, continue the scheme to extort client/victim Tavares. Tavares’ co-counsels, Stumpf, Lopez, and Black Srebnick, knowing that, among other things, that Tavares’ Companies Defendants’ attorney “**Lehman is bought**”, and that Bridgeloan Investors, Inc. is a sham lender used by a Transnational Continued Criminal Enterprise, “**Charles, this is a Criminal Enterprise**”, falsely stating that Stumpf and Black Srebnick cannot protect and defend client Tavares from the Criminal Enterprise, “**There is nothing I can do for you**”, shamelessly coerces and extorts client Tavares, “**I wish I was in the case six months ago.**” Lehman, LKLS+G, and Fine emails, furthering the scheme extorting client Tavares, is in violation of Title 18, U.S.C. §1343 (Wire Fraud).

Count 500 - Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a “*Money Bag Man*”, for Romulo Pina Dantas and Marcos Menezes, Alan Samuel Fine, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [makes threats to Tavares and Tavares’ family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under the powers of BRIDGELOAN’s Criminal Enterprise, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 501 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Alan Samuel Fine, 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, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States of America, 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 of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

Count 502 –Thomas Ralph Lehman, Patrick J. Rengstl, Larry Allen Stumpf, Jared Michael Lopez, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

503	April 7, 2011 at around 4:00 P.M.	U. S. CODE TITLE 18	Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf The Criminal Enterprise (CCE)
504		§ 371 Conspiracy to Defraud the USA &	
505		§ 241 Conspiracy Against Rights &	
506		§ 242 Deprivation of Rights -Under Color of Law &	
507		§ 1346 Scheme/Artifice to Defraud &	
508		§ 1343 Wire Fraud &	
509		§ 1951 Extortion (Hobbs Act) &	
510		§ 1961 <i>et seq.</i> – RICO &	
		Florida Bar Rules of Professional Conduct	
		Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 7, 2011, Charles Tavares’ (“Tavares”) corrupt attorneys Larry A. Stumpf (“Stumpf”), [Jared Michael Lopez](#) (“Lopez”), [Black Srebnick Kornspan & Stumpf’s, P.A.](#) (“Black Srebnick” or BSK&S”), at all relevant times, conspiring, jointly and together with, *inter alia*, [Tavares’ co-counsels Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), to further a scheme depriving and extorting Tavares of properties and rights in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, to further the scheme, submits an [E-mail](#) to client Tavares, continuing to, knowingly and intentionally, falsely advising client Tavares that Tavares must capitulate to the fraudulent “*agreed*” sham settlement with BRIDGELOAN & MUNB Loan Holdings, LLC (“BNY Mellon”), despite knowing the sham settlement is, *e.g.*, fraudulently entered against [Tavares’ orders not to settle](#), predicated on secret [sham Power of Attorneys of Tavares’ Companies fabricated](#) by Tavares’ **bought** co-counsels Lehman, LKLS+G, *et al.*, fraudulently stating: “Charles – We need to have no misunderstanding here -- 1. As we have repeatedly discussed and confirmed with you, all parties (including you) have, through their counsel, advised the Court that the parties have agreed t the entry of a foreclosure judgment tomorrow. **The Court will not hear any ‘evidence of fraud’, or any other evidence, tomorrow.** The only issue for tomorrow is the form of the judgment to be entered, and it appears that there is, or will soon be, agreement on the form of a **judgment that is advantageous to you.** For some time we have been operating on the agreed game plan – negotiate the best possible judgment of foreclosure and attempt to preserve your claims against Dantas, which claims have been severed, and you contemplated claims against Bridgeloan. 2. The ‘evidence’ that you have assembled to date and that we have briefly discussed, would, in any event, not, in our view, be sufficient to establish the defenses to a foreclosure judgment that have been asserted on your behalf. **3. It is our view that any attempt to offer any evidence tomorrow would be detrimental to your subsequent claims.** 4. Your position regarding the control of the entities was plainly expressed to Tom [Lehman] at our meeting yesterday. Please call if you want to discuss in more detail... Larry A. Stumpf, Esq.” At all relevant times, Lopez, Stumpf, and Black Srebnick, are covertly conspiring to further the scheme extorting the unsuspecting client Tavares of properties and rights, under color of law, upon the courts.

COUNTS

Count 503 - 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 504 - 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 505 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 506 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 507 - Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Jared Michael Lopez ("Lopez") (JLopez@royblack@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("BSK&S" or "Black Srebnick"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme coercing, and extorting Charles Tavares ("Tavares") (ctavares@bellsouth.net) of properties and rights upon sham court proceedings, certain E-mails of April 7, 2011 – to wit: **507 (a) E-Mail at around 4:00 p.m., From Stumpf To Tavares, cc Lopez: "Subject: Bridgeloan – Final Judgment of Foreclosure – ""Charles – We need to have no misunderstanding here -- 1. As we have repeatedly discussed and confirmed with you, all parties (including you) have, through their counsel, advised the Court that the parties have agreed t the entry of a foreclosure judgment tomorrow. **The Court will not hear any 'evidence of fraud', or any other evidence, tomorrow.** The only issue for tomorrow is the form of the judgment to be entered, and it appears that there is, or will soon be, agreement on the form of a **judgment that is advantageous to you.** For some time we have been operating on the agreed game plan – negotiate the best possible judgment of foreclosure and attempt to preserve your claims against Dantas, which claims have been severed, and you contemplated claims against Bridgeloan. 2. The 'evidence' that you have assembled to date and that we have briefly discussed, would, in any event, not, in our view, be sufficient to establish the defenses to a foreclosure judgment that have been asserted on your behalf. 3. **It is our view that any attempt to offer any evidence tomorrow would be detrimental to your subsequent claims.** 4. Your position regarding the control of the entities was plainly expressed to Tom [Lehman] at our meeting yesterday. Please call if you want to discuss in more detail... Larry A. Stumpf".** Unknown to unsuspecting client Tavares, still trusting Tavares' attorneys Stumpf, Lopez, and Black Srebnick, are also **criminals** using their Florida Bar as guise to extort Tavares.

Tavares' co-counsel, Stumpf, Lopez, and Black Srebnick, knowing that, *inter alia*, [Tavares' Companies Defendants' attorney](#) "**Lehman is bought**", and that Bridgeloan Investors, Inc. is a sham lender used by a Criminal Enterprise, "**Charles, this is a Criminal Enterprise**", falsely states Stumpf and Black Srebnick cannot protect and defend client Tavares from the Criminal Enterprise, and "**The Court will not hear any evidence of fraud, or any other evidence, tomorrow**", including that the agreed settlement is fraudulent, predicated on Tavares' attorneys LKLS+G being **bought** by opposing parties, and is against Tavares' orders not to settle. Stumpf, Lopez, and Black Srebnick's [E-mail](#), shamelessly furthering the scheme extorting client Tavares, shows that they are also systematically, covertly conning, coercing, depriving, and extorting client/victim Tavares, under color of law, of properties and rights, in a court of law in the United States of America, in violation of Title 18, U.S.C. §1343 (Wire Fraud).

Count 508 - Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or BSK&S"), Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a "*Money Bag Man*", for Romulo Pina Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [makes threats to Tavares and Tavares' family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under the powers of BRIDGELoAN's Criminal Enterprise, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 509 - At all times relevant, Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), 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, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States of America, 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 of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

Count 510 – Larry Stumpf, Jared Lopez, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme extorting Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent Powers of Attorney to falsely settle the case, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, and depriving the United States and the State of Florida of honest services, in violation of, *inter alia*, Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

511	April 7, 2011 at 4:24 P.M.	U. S. CODE TITLE 18	Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Olten Ayres de Abreu Junior Romulo Pina Dantas Marcos Jose Bezerra Menezes Alan Samuel Fine The Criminal Enterprise (CCE)
512		§ 371 Conspiracy to Defraud the USA &	
513		§ 241 Conspiracy Against Rights &	
514		§ 242 Deprivation of Rights -Under Color of Law &	
515		§ 1346 Scheme/Artifice to Defraud &	
516		§ 1343 Wire Fraud &	
517		§ 1951 Extortion (Hobbs Act) &	
518		§ 1961 <i>et seq.</i> – RICO & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 7, 2011, Charles Tavares’ (“Tavares”) corrupt attorneys [Thomas R. Lehman](#) (“Lehman”), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), at all relevant times, [fraudulently representing Tavares individually, and Tavares’ Companies’ Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Park Marina, Inc. (“[Tavares’ Companies](#)” or “Mortgagor Companies”), covertly furthering an underlying scheme to deprive and extort Tavares of properties and rights in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, to further the scheme, submits a sham [E-mail](#) of April 7, 2011 at 4:24 p.m. to Olten Ayres de Abreu Junior (“Abreu Jr.” or “Money Bag Man”), representing Third-Party Defendant Romulo Pina Dantas (“Dantas”), and Marcos Jose Bezerra Menezes (“Menezes”), and copied to Alan Samuel Fine¹⁵⁷ (“Fine”), Patrick J. Rengstl (“Rengstl”), and Robin Barrera (“Robin Barrera”) at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”). The record shows that, Tavares’ attorneys Lehman, Rengstl, and LKLS+G are corrupted, and “**bought**” by Abreu Jr., and BRIDGELoAN, and at all relevant times, are conspiring, together with other Perpetrators implicated, to deprive and extort client Tavares of Tavares’ [Two Properties valued over \\$50 million dollars](#), securing a sham \$12 million dollars BRIDGELoAN/[BNY Mellon](#) loan. The record shows that Lehman, in a meeting of April 6, 2011 at 10:00 a.m., is exposed being **bought** defrauding client Tavares, and taking orders from opposing parties Abreu Jr. and BRIDGELoAN, and [fabricating patently false, invalid and fraudulent Power of Attorneys of Tavares’ Companies](#) to [secretly and fraudulently settle](#) the sham Bridgeloan Case against [client Tavares’ express orders not to settle](#), and orders to file for Bankruptcy Protection for Tavares’ companies.

¹⁵⁷ Fine is a longtime [Associate, and attorney](#) of BRIDGELoAN’s Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and a [Tavares’ former attorney](#), knowingly and intentionally representing Dantas – and willfully not making a court appearance in the Third-Party Claims by Tavares against Dantas, because Fine is, *inter alia*, in fatal conflict against all parties, covertly extorting Dantas, to further BRIDGELoAN’s schemes upon the subverted Miami Courts.

The Record obtained in the Related Malpractice & Fraud Case by *Charles Tavares, Brickell Village One, LLC and 2147 SW 8 Street, LLC v. Thomas R. Lehman & LKLS+G*, Case No. 2013-12223-CA-40, shows that, shameless criminals Lehman and LKLS+G, at all relevant times, are coercing, threatening, and extorting client Tavares, brazenly furthering the underlying scheme extorting Tavares of properties and rights.

COUNTS

Count 511 - 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 512 - 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 513 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 514 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 515 - Thomas R. Lehman ("Lehman") (trl@lkllaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lkllaw.com), Robin Barrera ("Robin Barrera") (RBarrera@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Alan Samuel Fine ("Fine") (AFine@fine-law.com), Olten Ayres de Abreu Junior ("Abreu Jr.") (olten@fbt.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares ("Tavares") of properties and rights upon sham court proceedings, a certain [E-mail](#) of April 7, 2011 – to wit: **515 (a) E-mail at 4:24 p.m., From Lehman To Abreu Jr., cc Fine, Rengstl and Robin Barrera:** *"Subject: Bridgeloan - "Olten [Abreu Jr.], A conflict has arisen in my continued involvement as attorney for the companies in the Bridgeloan case. It is explained below and is apparent in the emails I have forwarded you today and yesterday. I am attempting to resolve the conflict before trial tomorrow morning. I have spoken to Charles' [Tavares] attorney who is working to resolve the problem as well. I have reached out to Alan Fine to help us too on the corporate issues. The Florida Secretary of State's records show that Charles has not been removed as manager and president of the companies. It was my understanding until yesterday that the shareholders had Charles removed as manager and president. In his [Tavares] capacity as president and manager, he has instructed me to move forward with the defense of the case and not settle. I recognize that the controlling shareholders of all the companies want the settlement. However, the officer/manager with apparent authority to direct the companies'*

litigation (**Charles**) [Tavares] **has told me the companies do not accept the settlement.** This has created a conflict for me to continue to represent the companies in the Bridgeloan case. Charles' [Tavares] attorney believes the settlement is in Charles' [Tavares] best interest and between now and tomorrow, he will attempt to convince Charles [Tavares] to agree to the settlement. If the conflict is not resolved, by trial, I must inform the court of the conflict, request authorization to withdraw and ask the court for a continuance of trial. Thomas R. Lehman – Partner LKLS+G". Tavares' corrupt attorneys Lehman, Rengstl, LKLS+G, et al., at all relevant times, conspiring to defraud the unsuspecting client Tavares of properties and rights, under color of law, know that Tavares, and Tavares only, has sole legal authority of Tavares' Companies Defendants. Lehman, disingenuously, states, among other things, that Lehman knows to be untrue and false, that: **(a)** "A conflict has risen in my continued representation as attorney," since at all relevant times, Lehman knows he is fraudulently representing Tavares' Companies while secretly taking orders from Fine, Abreu Jr., and BRIDGELOAN, to further the scheme against client Tavares. **(b)** "I have spoken to Charles' [Tavares] attorney who is working to resolve the problem as well", meaning that Lehman has requested Tavares' co-counsels to continue coercing and threatening Tavares to capitulate to the extortion. **(c)** "The Florida Secretary of State's records show that Charles has not been removed as manager and president of the companies. It was my understanding until yesterday that the shareholders had Charles [Tavares] removed as manager and president", as Lehman, et al., all know that Tavares, at all relevant times has sole legal authority, and no one else could properly and legally remove Tavares from Tavares' Companies. **(d)** "I recognize that the controlling shareholders of all the companies want the settlement", which Lehman knows is not true because Tavares, the controlling shareholder of Tavares' Companies, repeatedly ordered Tavares' attorneys Lehman and LKLS+G not to settle. **(e)** "However, the officer/manager with apparent authority to direct the companies' litigation (**Charles**) [Tavares] **has told me the companies do not accept the settlement**", which is true, since Tavares, repeatedly ordered Tavares' Companies' attorneys Lehman and LKLS+G not to settle and ordered LKLS+G to file for Bankruptcy for Tavares' Companies. But the record shows, that, despite these facts and truth, Lehman & LKLS+G, knowingly and intentionally, without authority, agreed to a sham Settlement on March 31, 2011, against Tavares' orders, and against Tavares, and Tavares' Companies best interests, because "**Lehman is bought**". **(f)** "This has created a conflict for me to continue to represent the companies in the Bridgeloan case", which is patently false, because the conflict existed at all relevant times, as Lehman and LKLS+G are "**bought**", covertly working to coerce, defraud, and extort client Tavares. **(g)** "Charles' [Tavares] attorney [Stumpf and Black Srebnick] **believes the settlement is in Charles' [Tavares] best interest and between now and tomorrow, he will attempt to convince Charles [Tavares] to agree to the settlement,**" which is patently false, as Stumpf and Black Srebnick know that, *inter alia*, Lehman and LKLS+G are "**bought**", and Tavares is being extorted by a "**Criminal Enterprise**" with a false and invalid settlement by the Perpetrators, fraudulently agreed, without legal authority, giving BRIDGELOAN Tavares' two properties valued \$50 million dollars, in lieu of a sham \$12 million loan, and Tavares receiving Zero (\$0.00) dollars, is only *advantageous* to the **Criminals** implicated; and **(h)** "If the conflict is not resolved, by trial, I must inform the court of the conflict", which is Lehman telling his co-conspirators that they must successfully coerce & extort Tavares to capitulate to the scheme, or Lehman will not participate on the unscheduled sham proceeding of April 8, 2011, in which the Perpetrators, desperate to deprive and steal Tavares' properties and rights, are planning to improperly hold, no matter what, to successfully extort Tavares, under color of law.

Count 516 - Thomas Ralph Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a “*Money Bag Man*”, for Romulo Pina Dantas and Marcos Menezes, Alan Samuel Fine, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo P. Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares’ family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under color of law, to further BRIDGELoAN’s Criminal Enterprise’s schemes, in violation of 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 517 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Robin Barrera, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a “*Money Bag Man*”, for Romulo Pina Dantas and Marcos Menezes, Alan Samuel Fine, 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, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States of America, 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 of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, *e.g.*, Record and [Tavares Sworn Affidavit](#).

Count 518 –Thomas Ralph Lehman, Patrick J. Rengstl, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

519	April 7, 2011 at 4:39 P.M. and at 4:49 P.M.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf
520		§ 241 Conspiracy Against Rights &	Thomas Ralph Lehman Patrick J. Rengstl
521		§ 242 Deprivation of Rights -Under Color of Law &	LKLS+G, LLP Matthew Paul Leto
522		§ 1346 Scheme/Artifice to Defraud &	Andrew Clifford Hall Hall Lamb and Hall, P.A.
523		§ 1343 Wire Fraud &	Joseph Horn Ricardo Eichenwald
524		§ 1951 Extortion (Hobbs Act) &	Bridgeloan Investors, Inc. Alan Samuel Fine
525		§ 1961 <i>et seq.</i> – RICO &	Olten Ayres de Abreu Junior Romulo Pina Dantas
526		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Marcos Jose Bezerra Menezes The Criminal Enterprise (CCE)

On April 7, 2011, Charles Tavares’ (“Tavares”) corrupt attorneys [Thomas R. Lehman](#) (“Lehman”), Patrick J. Rengstl (“Rengstl”), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), at all relevant times, [fraudulently representing Tavares individually, and Tavares’ Companies’ Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Park Marina, Inc. (“[Tavares’ Companies](#)” or “Mortgagor Companies”), furthering an underlying scheme to deprive and extort client Tavares of properties and rights in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, to further the scheme, submits a sham [E-mail](#) of April 7, 2011 at 4:39 p.m., stating, “*One of you please call me. Matt Leto called me to tell me the settlement is approved and they are just working out the MUNB [Bank of New York Mellon] issues. I had to explain that I am in a conflict situation which I am trying to resolve. He said if the conflict is not resolved and I must withdraw, he will ask the court to hear Bridgeloan’s summary judgment motion.* **Larry [Stumpf] and Jared [Lopez], you must try to convince Charles [Tavares] to withdraw his position opposing the companies agreeing to the settlement. Thomas R. Lehman – Partner LKLS+G**”. Tavares’ co-counsels, Larry A. Stumpf (“Stumpf”), and Jared M. Lopez (“Lopez”), and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), corrupted into the scheme, are following orders from Tavares’ corrupt attorneys Lehman and LKLS+G, despite knowing **Lehman is bought**, systematically coercing, threatening, and extorting client Tavares to capitulate to the fraudulently *agreed* settlement, because, among other things, **it is Black Srebnick’s view that any attempt to offer any evidence of frauds at the unscheduled sham “trial” would hamper Tavares’ future claims against BRIDGELoAN, Third Party Defendant Dantas, et al.** And, that, Tavares is being victimized, upon the courts, by a **Criminal Enterprise**, and **there is nothing Black Srebnick can do to protect client Tavares**. Client Tavares, unsuspecting, believed and trusted Tavares’ attorneys Black Srebnick, and followed their legal advice, not knowing that, at all relevant times, Black Srebnick attorneys are criminals, covertly coercing, threatening, and extorting Tavares to further the scheme extorting Tavares, under color of law, of properties and rights.

COUNTS

Count 519 - 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 520 - 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 521 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 522 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 523 - Thomas Ralph Lehman ("Lehman") (trl@lkllaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Jared Michael Lopez ("Lopez") (JLopez@royblack@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("BSK&S" or "Black Srebnick"), Alan Samuel Fine ("Fine") (AFine@fine-law.com), Olten Ayres de Abreu Junior ("Abreu Jr.") (olten@fbt.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme coercing, and extorting Charles Tavares ("Tavares") of properties and rights upon sham court proceedings, certain E-mails of April 7, 2011 – to wit: **523 (a) [E-Mail](#) at 4:39 p.m., From Lehman To Stumpf, Lopez, cc Fine, Abreu Jr., and Rengstl:** *"Subject: Bridgeloan - One of you please call me. **Matt Leto called me to tell me the settlement is approved and they are just working out the MUNB** [The Bank of New York Mellon] **issues.** I had to explain that I am in a conflict situation which I am trying to resolve. He said if the conflict is not resolved and I must withdraw, he will ask the court to hear Bridgeloan's summary judgment motion. **Larry** [Stumpf] **and Jared** [Lopez], **you must try to convince Charles** [Tavares] **to withdraw his position opposing the companies agreeing to the settlement. Thomas R. Lehman – Partner LKLS+G":** and **523 (b) [E-Mail](#) at 4:49 p.m., From Lopez to Stumpf, Lehman, cc Fine, Abreu Jr., and Rengstl:** *"Subject: Re: Bridgeloan – Tom [Lehman], Charles does not object to the companies agreeing to a settlement, provided the form of the judgment is consistent with the draft you sent earlier and contains language whereby Bridgeloan agrees to waive any right to seek a deficiency judgment against Charles personally. I hope this settles whatever confusion existed over this point. Please send the final form of the judgment for our review ASAP. Jared M. Lopez, Esq. Black Srebnick Kornspan & Stumpf, P.A."* Tavares' attorneys Black Srebnick, shamelessly, knowing Tavares is being deprived and*

extorted of properties and rights, under color of law, in sham court proceedings in the United States of America, instead of protecting and defending client Tavares, Black Srebnick further coerces and extorts Tavares by threats and intimidation, knowing that Tavares is a victim of a **Criminal Enterprise**, and that, Tavares' co-counsels Lehman, Rengstl, and LKLS+G – are exposed fabricating, and false, invalid, and fraudulent Power of Attorneys of Tavares' Companies, are "**bought**", and are covertly taking orders from the **Criminal Enterprise**, and there is **nothing Black Srebnick can do for client Tavares now**, only coerce and threaten Tavares further, and that, if Tavares does not capitulate to the scheme extorting Tavares of Two Properties valued over \$50 million dollars, getting Zero Dollars (\$0.00) from a known sham agreed settlement, and that, in Black Srebnick's legal opinion, it is going to hamper Tavares' future claims against the parties depriving and extorting Tavares of properties and rights, if Tavares goes to court to expose the frauds. Stumpf, Lopez, Lehman, Rengstl, Fine, and Abreu Jr.'s emails, furthering the scheme extorting client Tavares, is in violation of Title 18, U.S.C. §1343 (Wire Fraud).

Count 524 - Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Alan Samuel Fine, Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a "**Money Bag Man**", for Romulo Pina Dantas and Marcos Menezes, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares' family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under powers of BRIDGELoAN's Criminal Enterprise, in violation of Title 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 525 - At all times relevant, Larry A. Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Alan Samuel Fine, Olten Ayres de Abreu Junior, a Swiss/Brazilian attorney, fixer, and a "**Money Bag Man**", for Romulo Pina Dantas and Marcos Menezes, Bridgeloan Investors, Inc., Joseph Horn, Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitiero, The Bank of New York Mellon, 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, 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 526 – Thomas Ralph Lehman, Patrick J. Rengstl, Alan Samuel Fine, Larry Allen Stumpf, Jared Michael Lopez, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme coercing, threatening, depriving and extorting Tavares,¹⁵⁸ and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

¹⁵⁸ Tavares' attorneys Larry Allen Stumpf, Jared Michael Lopez, and Black Srebnick Kornspan & Stumpf's willful and repeated actions, *inter alia*, systematically coercing, intimidating, threatening, and extorting client Tavares to capitulate to the falsely, invalidly and fraudulently agreed settlement with Plaintiff's Bridgeloan Investors, Inc., secretly *agreed* by Tavares' corrupt attorneys Stumpf, Lopez, Black Srebnick Kornspan & Stumpf, Lehman, Rengstl, and Levine Kellogg Lehman Schneider + Grossman, LLP, against client Tavares repeated orders not to settle, as the sole legal authority for Tavares' Companies' Defendants a.k.a Mortgagor Companies, further predicted on false, invalid, and fraudulent authority of sham Power of Attorneys of Tavares' Companies Defendants, fabricated, and used by, among others, Tavares' corrupt and "**bought**" co-counsels Thomas Ralph Lehman, Patrick J. Rengstl, and Levine Kellogg Lehman Schneider + Grossman, LLP, to fraudulently settle, constitutes **extrinsic fraud upon the court**, by officers of the court, rendering the court's decisions, forever null and void. See [Lamb v. Leiter](#), 603 So. 2d 632, 635 (Fla. 4th DCA 1992), "**holding that duress and coercion constitute extrinsic fraud.**"

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

<u>COUNT</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
527	April 7, 2011 at 4:39 P.M.	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Lauren Vargas LKLS+G, LLP Julia Rivera Taylor Jonovic & Kircher-Echarte The Criminal Enterprise (CCE)
528		§ 241 Conspiracy Against Rights &	
529		§ 242 Deprivation of Rights -Under Color of Law &	
530		§ 1346 Scheme/Artifice to Defraud &	
531		§ 1343 Wire Fraud &	
532		§ 1951 Extortion (Hobbs Act) &	
533		§ 1961 <i>et seq.</i> – RICO &	
534		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 7, 2011, Charles Tavares' ("Tavares") corrupt attorneys [Thomas R. Lehman](#) ("Lehman"), Patrick J. Rengstl, Lauren Vargas, and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) ("LKLS+G"), at all relevant times, [fraudulently representing Tavares individually, and Tavares' Companies' Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Park Marina, Inc. ("[Tavares' Companies](#)" or "Mortgagor Companies"), covertly furthering an underlying scheme to deprive and extort Tavares of properties and rights in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), vitiated by fraud, to further the scheme, submits a sham [E-mail](#) of April 7, 2011 at 4:39 p.m., to Julia Rivera ("Julia Riverra") at Taylor Jonovic White Gendron & Kircher-Echarte a.k.a. [Taylor, Jonovic, White & Gendron, P.A.](#) (Taylor Jonovic Reporters") (Tax Id. #59-2101118), requesting a Court Reporter for a sham "[Trial on April 8, 2011, at 9:00 a.m.](#)" At all relevant times, [Tavares' attorneys LKLS+G](#), "[bought](#)", fraudulently representing Tavares, while covertly taking orders from opposing parties to further a scheme coercing, depriving, and extorting client Tavares of Two Properties valued over \$50 million dollars in lieu of a sham \$12 million dollars loan by sham lender BRIDGELoAN and its associate and enabler The Bank of New York Mellon a.k.a. MUNB Loan Holdings, LLC ("BNY Mellon"), falsely, invalidly, and fraudulently *agreeing* to a sham settlement giving Tavares' Properties to sham lender BRIDGELoAN, while fraudulently acting with fraudulent Power of Attorneys of Tavares' Companies that Lehman, LKLS+G, *et al.*, secretly fabricated and used to deprive and extort Tavares. Because BRIDGELoAN's Transnational Continued Criminal Enterprise ("Criminal Enterprise" or "CCE") has completely subverted the Miami Courts, and officers of the courts, among others, corrupt Judge Allan Lester Langer ("Judge Langer"), Tavares' co-counsels Lehman, Rengstl, LKLS+G, Larry Allen Stumpf ("Stumpf"), Jared Michael Lopez (Lopez"), and Black Srebnick Kornspan & Stumpf, P.A., they all shamelessly agree to hold an unnoticed sham *Trial* on April 8, 2011, to have the subverted Miami Courts legalize the scheme extorting Tavares of rights and properties, under color of law, and further allowing BRIDGELoAN and BNY Mellon to money launder the ill-gotten proceeds upon the court.

Tavares' Attorneys LKLS+G's Sham [E-Mail](#) of April 7, 2011 at 4:39 P.M. Requesting a Court Reporter for an Unscheduled Trial on April 8, 2011 at 9:00 AM to Fraudulently Legalize a Scheme Extorting Tavares

"From: Lauren Vargas (LVargas@lkllaw.com)
Date: **April 7, 2011 at 4:39 PM**
To: Julia Rivera (tjscheduling@msn.com)
Subject: **Scheduling – Trial on April 8, 2011 at 9:00 am**

Hi Julia,

Attached is a notice of hearing for reference to style and case information only. **We do not have a notice of trial**, however we have been confirmed at the calendar call for trial tomorrow at 9:00 am before the honorable Lester Langer in room 507 in Miami-Dade County Courthouse.

Please confirm a court reporter will be present.

Lauren Vargas, Legal Assistant LKLS+G"

"From: Julia Rivera (tjscheduling@msn.com)
Date: **April 7, 2011 at 4:43 PM**
To: Lauren Vargas (LVargas@lkllaw.com)
Subject: **Scheduling – Trial on April 8, 2011 at 9:00 am**

Got it

Thank you
Julia Rivera – Office Manager – Ft. Lauderdale
Taylor Jonovic White Gendron & Kircher-Echarte"

From: Lauren Vargas (LVargas@lkllaw.com)
Date: **April 7, 2011 at 4:43:40 PM**
To: Julia Rivera (tjscheduling@msn.com)
Subject: **Scheduling – Trial on April 8, 2011 at 9:00 am**

So we are confirmed?

"From: Julia Rivera (tjscheduling@msn.com)
Date: **April 7, 2011 at 4:47 PM**
To: Lauren Vargas (LVargas@lkllaw.com)
Subject: **Scheduling – Trial on April 8, 2011 at 9:00 am**

Yes

Julia Rivera – Office Manager – Ft. Lauderdale
Taylor Jonovic White Gendron & Kircher-Echarte"

"From: Lauren Vargas (LVargas@lkllaw.com)
Date: **April 7, 2011 at 4:48 PM**
To: Patrick J. Rengstl (pjr@lkllaw.com)
Subject: **FW: Scheduling – Trial on April 8, 2011 at 9:00 am**".

COUNTS

Count 527 - 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 528 - 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 529 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 530 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 531 - Lauren Vargas ("Lauren Vargas") (LVargas@lkllaw.com) , Patrick J. Rengstl ("Rengstl") (pjr@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Julia Rivera ("Julia Rivera") (tjscheduling@msn.com), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares ("Tavares") of properties and rights upon sham court proceedings, a certain [E-mails](#) of April 7, 2011 – to wit: **531 (a)** E-mail at **4:39 p.m., From Lauren Vargas To Julia Rivera:** "Subject: **Scheduling – Trial on April 8, 2011 at 9:00 am** – *"Hi Julia, Attached is a notice of hearing for reference to style and case information only. We do not have a notice of trial, however we have been confirmed at the calendar call for trial tomorrow at 9:00 am before the honorable Lester Langer in room 507 in Miami-Dade County Courthouse. Please confirm a court reporter will be present. Lauren Vargas, Legal Assistant LKLS+G"*; **531 (b)** E-mail at **4:43 p.m., From Julia Rivera To Lauren Vargas:** "Subject: **Scheduling – Trial on April 8, 2011 at 9:00 am** - Got it Thank you Julia Rivera – Office Manager – Ft. Lauderdale Taylor Jonovic White Gendron & Kircher-Echarte"; **531 (c)** E-mail at **4:43:30 p.m., From Lauren Vargas To Julia Rivera:** "Subject: **Scheduling – Trial on April 8, 2011 at 9:00 am** - So we are confirmed?" ; **531 (d)** E-mail at **4:47 p.m., From Julia Rivera To Lauren Vargas:** "Subject: **Scheduling – Trial on April 8, 2011 at 9:00 am** – Yes Julia Rivera – Office Manager – Ft. Lauderdale Taylor Jonovic White Gendron & Kircher-Echarte"; and **531 (e)** E-mail at **4:48 p.m., From Lauren Vargas To Rengstl:** " FW: Subject: **Scheduling – Trial on April 8, 2011 at 9:00 am**". At all relevant times, Tavares' attorneys LKLS+G know that there is no scheduled "Trial" on April 8, 2011, and there was never a Notice of Trial of April 8, 2011 at 9:00 a.m. The Record also shows, *inter alia*, Plaintiff's BRIDGELoan undisposed second sham [Motion for Summary Judgment of March 14, 2011](#). At all relevant times, [Tavares' attorneys LKLS+G](#) are extorting Tavares of properties and rights.

Count 532 - Thomas Ralph Lehman, Patrick J. Rensgtl, Lauren Vargas, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares' family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under powers of BRIDGELoAN's Criminal Enterprise, in violation of Title 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 533 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rensgtl, Lauren Vargas, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), 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, 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 534 – Thomas Ralph Lehman, Patrick J. Rensgtl, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

535	April 7, 2011 at 5:02 P.M.	<u>U. S. CODE TITLE 18</u>	Jared Michael Lopez Larry Allen Stumpf Black Srebnick Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Alan Samuel Fine Olten Ayres de Abreu Junior The Criminal Enterprise (CCE)
536		§ 371 Conspiracy to Defraud the USA &	
537		§ 241 Conspiracy Against Rights &	
538		§ 242 Deprivation of Rights -Under Color of Law &	
539		§ 1346 Scheme/Artifice to Defraud &	
540		§ 1343 Wire Fraud &	
541		§ 1951 Extortion (Hobbs Act) &	
542		§ 1961 <i>et seq.</i> – RICO & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 7, 2011, Charles Tavares’ (“Tavares”) corrupt attorneys Jared Michael Lopez (“Lopez”), Larry Allen Stumpf (“Stumpf”), and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), at all relevant times, conspiring jointly and together with Tavares corrupt co-counsels [Thomas Ralph Lehman](#) (“Lehman”), Patrick J. Rengstl, and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), [fraudulently representing Tavares individually, and Tavares’ Companies’ Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Park Marina, Inc. (“[Tavares’ Companies](#)” or “Mortgagor Companies”), in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, to further the scheme, exchange sham [E-mails](#) of April 7, 2011 at 5:02 p.m., stating: ***“I will be there. Seems to me it will be helpful to circulate, at a minimum, an outline of the basic terms so we know what is being agreed to. When you say Leto called to say the “settlement is approved” what does that mean? Jared M. Lopez, Esq. Black Srebnick Kornspan & Stumpf, P.A.”*** Less than one hour before, Tavares’ co-counsels Stumpf and Lopez at Black Srebnick, following orders from Tavares’ corrupt co-counsel Lehman at LKLS+G, successfully coerces, threatens, and extorts Tavares to capitulate to the secretly and fraudulently agreed settlement, against Tavares’ orders not to settle, depriving and extorting Tavares of Two Properties valued over \$50 million dollars. And, just over 24 hours before, Lehman and LKLS+G, in a meeting of April 6, 2011 at 10:00 am, attended by client Tavares, Tavares’ attorneys Stumpf, Lopez, and Lehman, at Black Srebnick’s offices, Lehman and LKLS+G are exposed having fabricated false, invalid, and fraudulent Power of Attorneys of Tavares’ Companies Defendants, to secretly and fraudulently settle, during a sham mediation of March 29, 2011, the case against Tavares’ orders not to settle. Although, Stumpf and Lopez state ***“Lehman is bought”***, Tavares is being victimized by a ***“Criminal Enterprise”***, and ***There is nothing Black Srebnick can do to protect and preserve the client Tavares’ rights and the rule of law***, Stumpf, Lopez, and Black Srebnick, also corrupted into the scheme, covertly defrauding client Tavares, systematically and repeatedly, coerces and threatens Tavares, successfully extorting Tavares to capitulate to the scheme.

COUNTS

Count 535 - 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 536 - 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 537 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 538 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 539 - Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Jared Michael Lopez ("Lopez") (JLopez@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or BSK&S"), Thomas Ralph Lehman ("Lehman") (trl@lkllaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Alan Samuel Fine ("Fine") (AFine@fine-law.com), Olten Ayres de Abreu Junior ("Abreu Jr.") (olten@fbt.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares ("Tavares") of properties and rights upon sham court proceedings, a certain [E-Mails](#) of April 7, 2011 – to wit: **539 (a) E-mail at 5:02 p.m., From Lopez To Stumpf, Lehman, cc Fine, Abreu Jr., and Rengstl:** "Subject: Bridgeloan Attachments: ATT00001; ATT00002..gif; ATT00003..jpg - *I will be there. Seems to me it will be helpful to circulate, at a minimum, an outline of the basic terms so we know what is being agreed to. When you say Leto called to say the 'settlement is approved' what does that mean? Jared M. Lopez, Esq. Black Srebnick Kornspan & Stumpf, P.A.*"; **539 (b) E-mail at 4:59 p.m., From Lehman To Stumpf and Lopez:** "Subject: Bridgeloan – Jared and Larry, Matt and MUNB [The Bank of New York Mellon] coming to court at 8:15 a.m. to work with us on form of agreed foreclosure judgment. Will one of you be there? Thomas R. Lehman – Partner LKLS+G". At all relevant times, Tavares' attorneys Black Srebnick and LKLS+G know that there is no "agreed" Final Judgment of Foreclosure, and that Tavares is coerced and extorted, under color of law, to capitulate to the scheme by Tavares' own attorneys Stumpf, Lopez, Black Srebnick, Lehman, Rengstl, and LKLS+G, conspiring jointly and together with Abreu Jr. and BRIDGELoAN to extort Tavares of properties, and that there is no scheduled "*Trial*" on April 8, 2011, and there was never a Notice of Tial of April 8, 2011 at 9:00 a.m. The

Record also shows, *inter alia*, Plaintiff's BRIDGELOAN undisposed second sham [Motion for Summary Judgment of March 14, 2011](#). At all relevant times, [Tavares' attorneys LKLS+G](#) are extorting Tavares of properties and rights. The Final Judgment of Foreclosure, predicated on massive frauds upon the court, and extortion of Tavares, by officers of the court, systematically furthering a scheme coercing, intimidating, threatening, depriving, stealing, and extorting client/victim Tavares of properties and rights upon subverted proceedings, forever null and void, is in violation of 18 U.S.C. § 1343.

Count 540 - Larry Allen Stumpf ("Stumpf"), Jared Michael Lopez ("Lopez"), Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or BSK&S"), Thomas Ralph Lehman ("Lehman"), Patrick J. Rengstl ("Rengstl"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Alan Samuel Fine ("Fine") Olten Ayres de Abreu Junior ("Abreu Jr."), and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares ("Tavares") of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares' family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under powers of BRIDGELOAN's Criminal Enterprise, in violation of Title 18 U.S.C. § 1951 (Extortion / Hobbs Act).

Count 541 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry Allen Stumpf, Patrick J. Rengstl, LKLS+G, Alan Samuel Fine, Olten Ayres de Abreu, 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, 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 542 – Thomas Ralph Lehman, Patrick J. Rengstl, Larry Allen Stumpf, Jared Michael Lopez, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

543	April 7, 2011 at 9:22 P.M.	<u>U. S. CODE TITLE 18</u>	Thomas Ralph Lehman Patrick J. Rengstl Robin Barrera LKLS+G, LLP Jared Michael Lopez Larry Allen Stumpf Black Srebnick Alan Samuel Fine Olten Ayres de Abreu Junior Bridgeloan Investors, Inc. Matthew Paul Leto Hall Lamb and Hall, P.A. The Bank of New York Mellon Katz Barron Faust Squitero The Criminal Enterprise (CCE)
544		§ 371 Conspiracy to Defraud the USA &	
545		§ 241 Conspiracy Against Rights &	
546		§ 242 Deprivation of Rights -Under Color of Law &	
547		§ 1346 Scheme/Artifice to Defraud &	
548		§ 1343 Wire Fraud &	
549		§ 1951 Extortion (Hobbs Act) &	
550		§ 1961 <i>et seq.</i> – RICO &	
		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 7, 2011, Charles Tavares’ (“Tavares”) corrupt attorneys [Thomas Ralph Lehman](#) (“Lehman”), Patrick J. Rengstl, and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), at all relevant times, conspiring together with Tavares’ co-counsels attorneys Jared M. Lopez (“Lopez”), Larry Allen Stumpf (“Stumpf”), and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), [fraudulently representing Tavares individually, and Tavares’ Companies’ Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Park Marina, Inc. (“[Tavares’ Companies](#)” or “Mortgagor Companies”), in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, to further the scheme, exchange sham E-mails of April 7, 2011 at 9:22 p.m., stating: ***“Looks good to me except defendant is Miami River Park Marina, Inc. Instead of how it is repeated in judgment. Also, at the beginning you may want to change ‘on the evidence presented to ‘ on the evidence proffered without objection’. That way we can make a proffer on the evidence that would be presented that supports the two sale finding in the judgment. Thomas R. Lehman, Partner LKLS+G”***. The record shows that, *inter alia*, Tavares’ attorneys Lehman, Rengstl, and LKLS+G, fabricated sham Power of Attorneys of client Tavares’ Companies Defendants to secretly agree to the false, invalid, and fraudulent \$16.5 million dollars Final Judgment of Foreclosure, patently falsely inflated with millions of dollars in fraudulent claims contained on [two fraudulent Affidavits by BRIDGELoAN’s Joseph Horn](#) (“Horn”), and used the artifice of *two sales* for Tavares’ Two Properties, valued over \$50 million dollars, securing a sham \$12 million dollars BRIDGELoAN/BNY Mellon Bank’s loan, to extort Tavares of both properties and rights, under color of law, in subverted proceedings. Because they know Tavares is negotiating to sell one of Tavares’ Two Properties, and that one Property alone can be sold separately for over the amount of the sham Final Judgment, the Perpetrators devise the scheme of placing the *Lion’s share* of the sham judgment on Tavares’ Brickell Buildings Property, and further, planning to stage a sham unnoticed “trial” on April 8, 2011 at 9:00 a.m., to make sure the Perpetrators can freely deprive and extort Tavares of properties and rights, and having the subverted court to legalize the scheme.

COUNTS

Count 543 - 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 544 - 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 545 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 546 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 547 - Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Jared Michael Lopez ("Lopez") (JLopez@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or BSK&S"), Thomas Ralph Lehman ("Lehman") (trl@lkllaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lkllaw.com), Robn Barrera ("Robin Barrera") (RBarrera@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Olten Ayres de Abreu Junior ("Abreu Jr.") (olten@fbt.ch), Matthew Paul Leto ("Leto") (MLeto@hlhlawfirm.com), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares ("Tavares") of properties and rights upon sham court proceedings, a certain E-Mails of April 7, 2011 – to wit: **547 (a)** E-mail at 9:22 p.m., **From Lehman To Leto and Lopez, cc Stumpf, Abreu Jr., Robin Barrera, and Rengstl:** "Subject: *Bridgeloan v. Miami River et al – FOR SETTLEMENT – Looks good to me except defendant is Miami River Park Marina, Inc. Instead of how it is repeated in judgment. Also, at the beginning you may want to change 'on the evidence presented to 'on the evidence proffered without objection'. That way we can make a proffer on the evidence that would be presented that supports the two sale finding in the judgment. Thomas R. Lehman, Partner LKLS+G*"; **547 (b)** E-mail at 6:29 p.m., **From Lehman To Stumpf and Lopez:** " *Subject: Bridgeloan v. Miami River et al – FOR SETTLEMENT – Attached is a redlined proposed final judgment. It includes updated calculations bringing the interest current and also includes language from MUNB [The Bank of New York Mellon] pertaining to the sale dates. I have made some corrections to incorporate your changes from prior versions and have also provided this to MUNB's counsel. So, I am awaiting their approval on this version as well as yours.*" At all relevant times, they all know in truth and in fact that the "agreed" Final Judgment of Foreclosure is false, invalid, and fraudulent, and that the sham proceedings is vitiated by fraud upon the court by officers of the courts, systematically, jointly and together, extorting Tavares of properties and rights, under color of law.

Count 548 - Larry Allen Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Alan Samuel Fine (“Fine”) Olten Ayres de Abreu Junior (“Abreu Jr.”), and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares’ family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under powers of BRIDGELoAN’s Criminal Enterprise, in violation of Title 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 549 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Patrick J. Rengstl, LKLS+G, Alan Samuel Fine, Olten Ayres de Abreu, 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, 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 550 – Thomas Ralph Lehman, Patrick J. Rengstl, Larry Allen Stumpf, Jared Michael Lopez, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

551	April 8, 2011 at 8:08 A.M.	<u>U. S. CODE TITLE 18</u>	Jared Michael Lopez Larry Allen Stumpf Black Srebnick Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Alan Samuel Fine Olten Ayres de Abreu Junior The Criminal Enterprise (CCE)
552		§ 371 Conspiracy to Defraud the USA &	
553		§ 241 Conspiracy Against Rights &	
554		§ 242 Deprivation of Rights -Under Color of Law &	
555		§ 1346 Scheme/Artifice to Defraud &	
556		§ 1343 Wire Fraud &	
557		§ 1951 Extortion (Hobbs Act) &	
558		§ 1961 <i>et seq.</i> – RICO & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 8, 2011, Charles Tavares' ("Tavares") corrupt attorneys Jared M. Lopez ("Lopez"), Larry Allen Stumpf ("Stumpf"), and Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), at all relevant times, conspiring jointly and together with Tavares corrupt co-counsels [Thomas Ralph Lehman](#) ("Lehman"), Patrick J. Rengstl ("Rengstl"), Robin Barrera ("Robin Barrera"), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) ("LKLS+G"), [fraudulently representing Tavares individually, and Tavares' Companies' Defendants](#) Brickell Village One, LLC, 2147 SW 8 Street, LLC, & Miami River Park Marina, Inc. ("[Tavares' Companies](#)" or "Mortgagor Companies"), in the sham styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), vitiated by fraud, to further the scheme extorting client Tavares of properties and rights, under color of law, transmits an [E-mail](#), replying to a previous E-mail from Mathew Paul Leto ("Leto"), Lehman, Rengstl, Robin Barrera, and Olten Ayres de Abreu Junior ("Abreu Jr."), - willfully omitting client Tavares, with a fraudulently *agreed* Judgment, stating: "*Looks good to us as well. Jared M. Lopez, Esq., Black Srebnick.*" Tavares' corrupt attorneys Lopez, Stumpf, and Black Srebnick, know that the "*agreed*" Final Judgment is invalid, and fraudulent, because is predicated on, *inter alia*, an *agreed* settlement with BRIDGELoAN, fraudulently entered against Tavares' repeated orders not to settle, and instead, file Bankruptcy for Tavares' Companies to preserve Tavares' Two Properties valued over \$50 million dollars. Black Srebnick also knows that Lehman and LKLS+G are "***bought,***" and are taking orders from opposing parties to further the scheme extorting Tavares. The record shows that, at all times, Tavares' attorneys Black Srebnick are covertly conning, coercing, intimidating, threatening, and extorting Tavares to capitulate to agreeing to be extorted of Tavares' Properties and rights, and that, Black Srebnick fraudulently advised client Tavares not to fight the extortion, to preserve future claims against BRIDGELoAN, *et al.*, and falsely stating that ***the court will not hear any evidence of fraud, or any evidence whatsoever*** at the unscheduled sham "trial" on April 8, 2011, to be staged by the Perpetrators, with corrupt Judge Allan Lester Langer, to consummate the successful extortion of Tavares' properties and rights, under color of law, by officers of the court.

COUNTS

Count 551 - 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 552 - 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 553 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 554 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 555 - Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Jared Michael Lopez ("Lopez") (JLopez@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or BSK&S"), Thomas Ralph Lehman ("Lehman") (trl@lklaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lklaw.com), Robin Barrera ("Robin Barrera") (RBarrera@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Matthew Paul Leto ("Leto") (MLeto@hlhlawfirm.com), Olten Ayres de Abreu Junior ("Abreu Jr.") (olten@fvt.ch), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares ("Tavares") of properties and rights upon sham court proceedings, a certain [Email](#) of April 8, 2011 – to wit: **555 (a) E-mail at 8:08 a.m., From Lopez To Leto, Lehman, cc Stumpf, Abreu Jr., Robin Barrera & Rengstl: "Subject: Bridgeloan v. Miami River et al – FOR SETTLEMENT - Looks good to us as well. Jared M. Lopez, Esq., Black Srebnick";** **555 (b) E-mail at 9:55 a.m., From Charles Tavares (ctavares@bellsouth.net) To Stumpf: "Subject: Miami River & Brickell Village"** - Tavares, stunned by the sordid events of the last few days, among others, the exposing of Tavares' longtime attorney Lehman secretly depriving and extorting client Tavares with false, invalid and fraudulent Power of Attorneys of Tavares' Companies Defendants, secretly used by Lehman, et al., to fraudulently settle the case, invalidly giving BRIDGELoAN Tavares' properties and rights valued over \$50 million dollars in lieu of a sham \$12 million dollars loan, expresses to Tavares' attorney Stumpf at Black Srebnick these facts, unsuspecting the fact that Stumpf, Lopez and Black Srebnick, at all relevant times, are conspiring together with Lehman, BRIDGELoAN, Abreu Jr., et al., to deprive and extort Tavares, and have been systematically conning, coercing, threatening, and extorting Tavares to capitulate to the scheme, and not to fight against the extortion, and to not show up at the sham staged "trial" on April 8, 2011, in violation of Title 18 U.S.C. §1343.

Count 556 - Larry Allen Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Alan Samuel Fine (“Fine”) Olten Ayres de Abreu Junior (“Abreu Jr.”), and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares’ family](#), coercing, intimidating, depriving, and extorting Tavares of properties and rights, under powers of BRIDGELoAN’s Criminal Enterprise, in violation of Title 18 U.S.C. § 1951 (Extortion / Hobbs Act).

Count 557 - At all times relevant, Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP Larry A. Stumpf, Patrick J. Rengstl, LKLS+G, Alan S. Fine, Olten Ayres de Abreu, Bridgeloan Investors, Inc., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Daniel Ades, Matthew Paul Leto, Hall Lamb and Lamb, P.A., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, The Bank of New York Mellon, 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, 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 558 – Thomas R. Lehman, Patrick J. Rengstl, Larry A. Stumpf, Jared M. Lopez, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies of properties, rights, and honest services upon courts of law, furthering underlying schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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 violation of Florida Bar Rule 4-8.4 MISCONDUCT. See, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

559	April 8, 2011 at 9:00 A.M.	<u>U. S. CODE TITLE 18</u>	Allan Lester Langer Miami Courts Jared Michael Lopez Larry Allen Stumpf Black Srebnick Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Mathew Paul Leto Hall Lamb and Hall, P.A. Ricardo Eichenwald Bridgeloan Investors, Inc. Erica Lee English Harold Eugene Lindsey III Katz Barron Faust Squitiero The Bank of New York Mellon Taylor Jonovic Court Reporters The Criminal Enterprise (CCE)
560		§ 371 Conspiracy to Defraud the USA &	
561		§ 241 Conspiracy Against Rights &	
562		§ 242 Deprivation of Rights -Under Color of Law &	
563		§ 1346 Scheme/Artifice to Defraud &	
564		§ 1344 Bank Fraud &	
565		§ 1951 Extortion (Hobbs Act) &	
566		§ 1961 <i>et seq.</i> – RICO &	
567		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules - Misconduct – Rule 4-8.4	

On April 8, 2011, Judge [Allan Lester Langer](#), in reckless disregard for the truth, law, and the record, showing, among other things, that the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), is a sham case¹⁵⁹ vitiated by fraud, by officers of the court, presides an unnoticed¹⁶⁰ patently staged sham proceeding to deprive Charles Tavares (“Tavares”) of properties & rights under color of law. The sham unscheduled *trial* is attended,¹⁶¹ with unclean hands, by Tavares’ corrupt attorneys [Thomas Ralph Lehman](#) (“Lehman”), at [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), and [Jared Michael Lopez](#) (“Lopez”), at [Black Srebnick Kornspan & Stumpf, P.A.](#) (“Black Srebnick” or “BSK&S”), and by BRIDGELoAN’s reckless attorney [Matthew Paul Leto](#) (“Leto”),

¹⁵⁹ The record shows that, Plaintiff Bridgeloan Investors, Inc. (“BRIDGELoAN”), is a sham lender, used by a Criminal Enterprise (“Criminal Enterprise” or “CCE”), with [associate](#) and [enabler](#) [The Bank of New York Mellon](#) (“BNY Mellon”), to further, *inter alia*, intercontinental money laundering, tax frauds, bank, securities, mortgage & portfolio tax-free bond frauds, and extortion, and BRIDGELoAN’s pleadings and claims are false and contradictory, supported by fabricated evidence, *e.g.*, BRIDGELoAN’s [Joseph Horn’s Fraudulent Affidavits](#), fabricated by Leto. *See, Hazel-Atlas Co. v. Hartford-Empire Co.*, 322 U.S. 238, 64 S. Ct. 997 (1944), stating: **“The fabrication of evidence by a party in which an attorney is implicated, will constitute fraud on the court.”**

¹⁶⁰ The Perpetrators know that, in truth and in fact, the staged legal farce, “*Trial of April 8, 2011*”, was never noticed and scheduled, and is held in desperation to quickly deprive Tavares of properties and rights before Tavares is able to sell one of Tavares’ Two Properties securing the sham loan, to pay off the sham loan, keeping excess equity, and the second property.

¹⁶¹Tavares’ attorneys Stumpf, Lopez, and Black Srebnick, corrupted into the scheme, systematically coerce, threaten and extort Tavares to capitulate to the known fraudulent Final Judgment, entered by Tavares’ attorneys against [Tavares’ orders not to settle, falsely advising Tavares](#) not to come to the sham trial as **“the court will not hear any evidence of fraud, or any evidence at all,”** as they cannot allow client Tavares to expose that Tavares’ attorneys are **“bought,”** and have [fraudulently settle](#) the case, using, *e.g.*, [fraudulent Power of Attorneys of Tavares’ Companies](#) that they [secretly fabricated](#), successfully producing an invalid and fraudulent [Final Judgment of Foreclosure](#), and [Final Judgment on Intervenor](#). *See* [Transcript of Sham Trial](#).

at Hall Lamb and Hall, P.A., and MUNB Loan Holdings, LLC a.k.a. [BNY Mellon's attorney Erica Lee English](#) ("English"), at [Katz Barron Faust & Squitiero](#) ("Katz Barron"), and BRIDGELoAN's [Ricardo Eichenwald](#) ("Eichenwald"). The record shows that, [Tavares' attorneys](#), Lehman, Rengstl, LKLS+G, and Stumpf, Lopez, and Black Srebnick, at all relevant times, are **bought**, and are conspiring together, with opposing parties, BRIDGELoAN, and Third Party Defendant [Romulo Pina Dantas](#) ("Dantas"), to covertly deprive and extort Tavares, and Tavares Companies' Defendants. Lehman, from July 2010, through January 2011, as part of the scheme, systematically try, unsuccessfully, to coerce Tavares into a [sham settlement with Tavares' investor Dantas](#), requiring Tavares to surrender sole control over [Tavares' Companies](#), to a new Special Purpose Entity ("SPE"). Then, Lehman, after confidentially [learning from client Tavares](#) that Tavares is negotiating to sell one of [Tavares' Two Properties, valued over \\$50 million dollars](#), securing the sham BRIDGELoAN/BNY Mellon \$12 million dollars loan, to pay off the loan, enters in panic mode to expedite the unsuspecting client Tavares' extortion. Lehman, [taking orders from opposing parties, inter alia](#), Dantas's [Brazilian/Swiss attorney](#), and *fixer*, [Olten Ayres de Abreu Junior](#) ("Abreu Jr."), devise an artifice to secretly fabricate false, invalid, and [fraudulent Power of Attorneys of Tavares' Companies Defendants](#) ("Sham POAs"), to secretly settle the BRIDGELoAN Case at a [sham mediation of March 29, 2011, against client Tavares' orders not to settle](#), and orders to Lehman to file Bankruptcy protection so Tavares can orderly sell one property. The record also shows Lehman is also [secretly dealing to extort Tavares' Properties with unrelated parties](#). Tavares' attorneys Lehman, Rengstl, LKLS+G, Stumpf, Lopez, and Black Srebnick, together with BRIDGELoAN's reckless attorney Leto and Hall & Lamb, to further the scheme, despite [Tavares' orders not to settle](#), covertly proceed with '[an agreed" settlement on March 30, 2011](#)'. A few days later, upon Tavares hearing about the unauthorized sham *agreed* settlement, [Tavares summons Tavares' attorneys](#) Lehman, LKLS+G, Stumpf, Lopez, and Black Srebnick, for a meeting on April 6, 2011, when [Lehman is exposed](#) invalidly and fraudulently acting with the fabricated Sham POAs'. Stumpf, Lopez, and Black Srebnick, falsely pretending not been corrupted, state, at the meeting, *e.g.*: "**Lehman is bought, This is a Criminal Enterprise, Charles, there is nothing I [Stumpf] can do for you now**". The reason Black Srebnick could do nothing to protect client Tavares, and to preserve the rule of law, is because, at all times, Stumpf, Lopez, and Black Srebnick are corrupted into the scheme extorting client Tavares. Tavares' corrupt attorneys Lehman, Rengstl, LKLS+G, Stumpf, Lopez, and Black Srebnick, in panic mode to extort, [embark in a frenetic campaign conning, coercing, intimidating](#), and threatening client Tavares to capitulate to the scheme, and to agree to the fraudulent settlement as the only way forward, in order **to preserve Tavares' subsequent claims against BRIDGELoAN and Dantas**. Then, on April 8, 2011, the shameless Perpetrators, criminals using their Florida Bar as guise to deprive and extort, coming with unclean hands, into **an unscheduled sham trial** improperly held, and presided by corrupt Judge Langer, to consummate the brazen scheme coercing, depriving, stealing, and extorting U.S. citizen Tavares of properties and rights, under color of law, in a court of law in the United States of America, stage the sham trial knowing that, in truth and in fact, that the sham *agreed* settlement of Final Judgment is false, invalid and fraudulent, and forever null and void. The record displayed shows that there was never a scheduled or set trial on April 8, 2011, in the Bridgeloan Case, and that there was never a Notice of Trial for April 8, 2011, *see* [Docket](#). The record shows that, among other things, there are undisposed motions before the court, *see, e.g.*, Plaintiff's Second Motion for [Summary Judgment filed on March 14, 2011](#). The short Transcript of the sham Trial, shows the Perpetrators staging the false, invalid, and unscheduled sham trial, and stating, among other things: **JUDGE LANGER:** "You all want to make your appearances on the record?" **LETO:** Matthew Leto, Hall, Lamb and Hall for Plaintiff." **ENGLISH:** "Erica English, Katz Barron, Squitiero Faust for MUNB Loan Holdings, Intervenors." **LOPEZ:** "Jared Lopez from Black Srebnick Korsnspar & Stumpf on behalf of Charles Tavares personally."

LEHMAN: "Tom Lehman on behalf of Miami River Park Marina, Inc, Brickell Village One, LLC and 2147 SW 8 Street, LLC." **LETO:** "And let me introduce my client, Ricardo Eichenwald from Bridgeloan Investors is here with us today well". **JUDGE LANGER:** "Okay. What's going on everybody?" **LETO:** "We're happy to say we've reached a settlement of all issues in this case." **JUDGE LANGER:** "Wonderful, okay." See Sham Trial [Transcript](#) ("Tr.") 3 at ¶¶ 2 – 21. **LEHMAN:** "We've prepared a judgment in the case that I'm involved in, involving my client's that own the actual real estate and Bridgeloan – and in which your Honor is instructing the foreclosure clerk to issue two notices of sale", See Tr. 5 at ¶¶ 4 – 8, "Tavares, who is the guarantor. **So we've cleaned up the whole thing and you won't see us again**"¹⁶², see Tr. at ¶¶ 16 – 18, "A final judgment which will say that proffers were made and admitted without objection", see Tr. 6 at ¶¶ 24 – 25; *Id.* 7 at ¶ 1. **LETO:** "No objection." **JUDGE LANGER:** "No objection?" **ENGLISH:** "No", see Tr. 7 at ¶¶ 13 – 15. **JUDGE LANGER:** "As long as it's agreed and everybody is okay with the language, I don't think we need to bring – you've already pretty much put everything on the record and as long as you bring it back to me and it's okay." **LEHMAN:** "And Matt, you can walk it through and once you've signed" – **JUDGE LANGER:** "-- and bring it back to me with envelopes or whatever else you need and it shouldn't be a problem, Thank you. Have a good morning," see Tr. 11 at ¶¶ 14 – 25. Afterwards, the Perpetrators, continuing covertly [cooking](#) the ill-gotten false, invalid, and fraudulent Final Judgment, and falsely stating, among other things, that, "**THIS ACTION was tried before the Court on April 8, 2011 on notice to all parties**", which is patently false and fraudulent, see [Docket](#). On April 8, 2011, at around 1:51 p.m., hours after the Perpetrators staged the sham unscheduled trial, producing the false, invalid, and fraudulent Final Judgment, and Final Judgment of Intervenor, Leto, fraudulently tries to file with the Clerk of the Court, a [sham late Notice of Hearing for April 8, 2011 at 9:00 a.m.](#), to cover up the scheme, **showing their conscious of guilt**, as the Perpetrators realize there was never any proceedings set, or noticed for April 8, 2011, in the BRIDGELoAN Case, and, the record shows that they, knowingly and intentionally, held a patently sham "trial" to further a scheme depriving and extorting Tavares of properties and rights,¹⁶³ under color of law, upon subverted Miami Courts. The record displayed shows to any honest outside observer that, *inter alia*, the Final Judgment, and Final Judgment of Intervenor, predicated on massive extrinsic fraud¹⁶⁴ upon the court by officers of the court, is false, invalid, and fraudulent, rendering the sham Judgments forever null and void.

¹⁶² Lehman's statements proved also not to be true, as the Perpetrators, in panic, rushing the sham settlement in the unscheduled sham invalid *trial*, on April 8, 2011, at 9:00 a.m., have to go back, hours later, to corrupt Judge Langer, to enter a new order, as their scheme required the Sham Final Judgment to place the *lion's share* of the sham Final Judgment on Tavares' Brickell Buildings' Property, going for auction first, contrary to the initial Final Judgment entered in the sham trial at 9:00 a.m.

¹⁶³ The improperly held unnoticed sham trial on April 8, 2011, is held in patent violation of Tavares' constitutional rights to due process of law, stating, in pertinent parts, that, "A party will receive a fundamentally fair, orderly, and just judicial proceeding," see, U.S. Const. Amend. V; and "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protections of the laws." See, U.S. Const. amend XIV, § 1.

^{xxx} Client Tavares' systematic coercion, threats, and extortion by Tavares' attorneys Lehman, Stumpf, Lopez, to capitulate to the sham settlement, constitutes extrinsic fraud on the court. See [Lamb v. Leiter](#), 603 So. 2d 632, 635 (Fla. 4th DCA 1992), "*holding that duress and coercion constitute extrinsic fraud*"; and Tavares' attorneys Lehman and Rengstl's fabrication of invalid, and fraudulent Power of Attorneys of Tavares' Companies' Defendants to secretly settle the case against Tavares' knowledge and orders no to settle, constitute extrinsic fraud on the court. Prevention on an unsuccessful party (from) presenting his case, by fraud or deception practiced by his adversary; keeping the opponent away from court; Falsely promising a compromise: ignorance of the adversary about the existence of the suit or the acts of the plaintiff; fraudulent representation of a party without his consent and connivance in his defeat; and so on. In other words, extrinsic fraud occurs where defendant has somehow been prevented from participating in a cause. See, [Yohan v. DeClaire](#), 421 So. 2d 551 (Fla. 4th DCA 1982).

COUNTS

Count 559 - 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 560 - 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 561 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 562 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 563 - Allan Lester Langer, Larry Stumpf, Jared Lopez, Black Srebnick Kornspan & Stumpf, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Matthew Paul Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, Alan Samuel Fine, Olten Ayres de Abreu Junior, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. ("BNY Mellon") (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares ("Tavares") of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon's Shareholders, in violation of, 18 U.S.C. §1344.

Count 564 - Allan Lester Langer, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or BSK&S"), Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Matthew Paul Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, The Bank of New York Mellon, Alan Samuel Fine,

Olten Ayres de Abreu Junior, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares’ family](#), systematically and repeatedly coercing, intimidating, depriving, and extorting Charles Tavares of properties and rights, under color of law, in violation of Title 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 565 - At all times relevant, Allan Lester Langer, Thomas R. Lehman, Patrick J. Rengstl, LKLS+G, Larry Stumpf, Patrick Rengstl, Alan Fine, Olten Ayres de Abreu, Romulo P. Dantas, Bridgeloan Investors, Inc., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Daniel Ades, Matthew Paul Leto, Hall Lamb and Lamb, P.A., Erica English, H. Eugene Lindsey III, Katz Barron, The Bank of New York Mellon, 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, 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 566 - Allan Lester Langer, Matthew P. Leto, Ricardo Eichenwald, Bridgeloan Investors, Inc., BNY Mellon, Erica L. English, Katz Barron Squitero Faust, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices); **566(a)** - The Perpetrators, knowingly and intentionally, to further the scheme, fraudulently state in the Final Judgment that, **“THIS ACTION was tried before the Court on April 8, 2011 on notice to all parties”**, in violation of, §837.02, F.S. (Perjury in Official Proceeding).

Count 567— Thomas R. Lehman, Patrick J. Rengstl, Larry A. Stumpf, Jared M. Lopez, Matthew Paul Leto, Erica Lee English, Harold Eugene Lindsey III, Allan Lester Langer, Alan Samuel Fine, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies of properties, rights, and honest services upon courts of law, furthering underlying schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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 violation of Florida Bar Rule 4-8.4 MISCONDUCT. See, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

567	April 8, 2011 at around 1:51 P.M.	<u>U. S. CODE TITLE 18</u>	Mathew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. The Criminal Enterprise (CCE)
568		§ 371 Conspiracy to Defraud the USA &	
569		§ 241 Conspiracy Against Rights &	
570		§ 242 Deprivation of Rights -Under Color of Law &	
571		§ 1346 Scheme/Artifice to Defraud &	
572		§ 1961 <i>et seq.</i> – RICO &	
573		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 8, 2011, Matthew Leto (“Leto”), Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), representing Bridgeloan Investors, Inc.¹⁶⁵ (“BRIDGELoAN”), in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, to cover up a scheme by officers of the court, after having successfully, hours before, **falsely staged a sham, unscheduled, and unnoticed sham trial on April 8, 2011 at 9:00 a.m.**, causing the Miami Courts to enter a sham Final Judgment of Foreclosure (“Final Judgment”), and a Final Judgment on Intervenor MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon (“BNY Mellon”), shamelessly, file, with unclean hands, a sham [Notice of Hearing for April 8, 2011 at 9:00 a.m.](#), on BRIDGELoAN’s Motion for Summary Judgement (“Sham Notice of Hearing”). At all relevant times, Leto, Andy Hall, Hall & Lamb, and other Perpetrators implicated, know that the Sham Notice of Hearing is fraudulent, and it is used to cover up the scheme by the Perpetrators,¹⁶⁶ extorting and depriving Defendant Charles Tavares (“Tavares”), and Tavares’ Companies’ Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (“Tavares’ Companies”) of properties and rights, valued over \$50 million dollars. As the massive frauds upon the Miami Courts start to unravel, the Criminal Enterprise viciously file seven (07) consecutive sham suits to steal, destroy, and silence victim Tavares. See [Related Cases](#).

¹⁶⁵ The record shows that, BRIDGELoAN is a sham lender, used by a Transnational Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”), with [associate](#) and [enabler The Bank of New York Mellon](#) (“BNY Mellon”), to further, *inter alia*, intercontinental money laundering, tax frauds, bank, securities, mortgage & portfolio tax-free bond frauds, and extortion, and BRIDGELoAN’s pleadings and claims are false and contradictory, supported by fabricated evidence, *e.g.*, BRIDGELoAN’s [Joseph Horn’s Fraudulent Affidavits](#), fabricated, and filed with the court by Leto to further the scheme upon the Miami Courts.

¹⁶⁶ Among other Perpetrators implicated, corrupt presiding Judge Allan Lester Langer, Tavares’ corrupt attorneys Thomas R. Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), together with Third Party Defendant Romulo Pina Dantas (“Dantas”), and Danta’s agent, and fixer, Olten Ayres de Abreu Junior (“Abreu Jr.”), and Intervenor BNY Mellon, and its attorneys Erica Lee English, Harold Eugene Lindsey III, at Katz Barron Faust Squitiero (“Katz Barron”).

Reckless Attorney [Matthew Leto's](#) Fraudulent [Notice of Hearing on April 8, 2011](#) at around 1:51 p.m., for a Hearing on April 8, 2011 at 9:00 a.m. for BRIDGELoAN's Motion for Summary Judgment

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

BRIDGELoAN INVESTORS, INC.,
a Florida corporation,
Plaintiff,

CIVIL DIVISION
CASE NO.: 09-93058 CA 30

v.

MIAMI RIVER MARINA PARK, INC. [sic],
a Florida Corporation, BRICKELL VILLAGE ONE, LLC, a Florida
Corporation [sic], 2147 SW 8 STREET, LLC, a Florida Corporation [sic],
Charles Tavares, individually,
DAVID PLUMMER & ASSOCIATES, INC., a Florida Corporation,
and the CITY OF MIAMI
Defendants.

**FILED FOR RECORD
April 8, 2011 at 1:51 PM**

**TOREY STEWART
* NOT TIMELY FILED**

NOTICE OF HEARING

PLEASE TAKE NOTICE that the undersigned attorneys have set down for hearing before the **Honorable Lester Langer**, Judge of the Circuit Court, 73 West Flagler Street, **Room 511**, Miami, Florida, on **Friday April 8, 2011 at 9:00 a.m.** or soon thereafter as the same can be heard the following:

Plaintiff's Motion for Summary Judgment

The undersigned does hereby certify that a bona fide effort to agree on a stipulated order, or to narrow the issues, has been or will be made prior to the date of this hearing.

Respectfully submitted,

HALL, LAMB AND HALL, P.A.
2665 South Bayshore Drive, Penthouse 1
Miami, Florida 33133
Telephone: (305) 374-5030 Facsimile: (305) 374-5033
By: /s/ Matthew Paul Leto
ANDREW C. HALL, Esq. – Florida Bar No. 111.480
MATTHEW P. LETO, Esq. - Florida Bar No. 14.504

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CERTIFICATE OF SERVICE [¹⁶⁷]

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-mail and U.S. Mail on this 7th day of April, 2011 to: **Patrick J. Rengstl, Esq.**, Levine Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd, Miami, FL 33131 and **Jorge L. Fors**, Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; **Erica English, Esq.**, Katz Barron Squitiero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, Florida 33131; and **Larry Stumpf, Esq.**, Black Srebnick Kornspan, 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131.”

¹⁶⁷ Leto, and Hall & Lamb, showing their conscious of guilt, also, willfully omit signature certification on Certificate of Service.

COUNTS

Count 567 - 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 568 - 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 569 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 570 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 571 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Lamb, P.A., 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, 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 572 - Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices); **572(a)** - The Perpetrators, knowingly and intentionally, to further the scheme, fraudulently state in the Sham Notice of Hearing, that, "*WE HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-mail and U.S. Mail on this 7th day of April, 2011 to: **Patrick J.***

Rengstl, Esq., Levine Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd, Miami, FL 33131 and **Jorge L. Fors**, Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; **Erica English, Esq.**, Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, Florida 33131; and **Larry Stumpf, Esq.**, Black Srebnick Kornspan, 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131,” when in truth and in fact, and the record show, that they did not serve the Sham Notice of Hearing, in violation of, §837.02, F.S. (Perjury in Official Proceeding).

Count 573 –Matthew Paul Leto, Andrew Clifford Hall, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies of properties, rights, and honest services upon courts of law, furthering underlying schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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 violation of Florida Bar Rule 4-8.4 MISCONDUCT. See, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
574	From April 11, through April 14, 2011	U. S. CODE TITLE 18	Allan Lester Langer
		§ 371 Conspiracy to Defraud the USA	Miami Courts
		&	Jared Michael Lopez
575		§ 241 Conspiracy Against Rights	Larry Allen Stumpf
		&	Black Srebnick
576		§ 242 Deprivation of Rights -Under Color of Law	Thomas Ralph Lehman
		&	Patrick J. Rengstl
577		§ 1346 Scheme/Artifice to Defraud	LKLS+G, LLP
		&	Mathew Paul Leto
578		§ 1344 Bank Fraud	Hall Lamb and Hall, P.A.
	&	Ricardo Eichenwald	
579	§ 1951 Extortion (Hobbs Act)	Bridgeloan Investors, Inc.	
	&	Erica Lee English	
580	§ 1961 <i>et seq.</i> – RICO	Harold Eugene Lindsey III	
	&	Katz Barron Faust Squitiero	
581	§ 1343 Wire Fraud	The Bank of New York Mellon	
	&	Olten Ayres de Abreu Junior	
	FLORIDA STATUTES	Alan Samuel Fine	
582	Title XLVI § 817.155 Fraudulent Practices	The Criminal Enterprise (CCE)	

From April 11, through April 14, 2011, the Perpetrators, Associates and/or corrupted by a Transnational Continued Criminal Enterprise¹⁶⁸ (“CCE” or “Criminal Enterprise”), knowingly and intentionally, using a court of law¹⁶⁹ in the United States to further criminal schemes against U.S. citizen Charles Tavares (“Tavares”), and Tavares’ Companies Defendants Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”) (collectively “Tavares’ Companies”), in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, Intervenor*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, by officers of the court, exchange [E-mails](#) to further the brazen scheme depriving and extorting Tavares of properties and rights in sham proceedings. The E-mails are obtained in 2013, upon discovery in the Related Case, *Tavares v. Thomas R. Lehman & LKLS, LLP*, Case No. [2013-12223-CA-40](#).

¹⁶⁸ The CCE is led by sham lender Bridgeloan Investors Inc.’s (“BRIDGELoAN”) principal Joseph Horn (“Horn”), Ralph Horn (“Ralph”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Daniel Ades (“Ades”), and Nelson Slosbergas (“Slosbergas”), together with, *inter alia*, associate and facilitator The Bank of New York Mellon a.k.a. MUNB Loan Holdings, LLC (“BNY Mellon”), and the CCE’s global network of reckless Associates in law, banking, securities, and real estate.

¹⁶⁹ On April 8, 2011 at 9:00 a.m., corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), in reckless disregard for the law, rules, and rights, improperly holds, and presides a sham unnoticed “*trial*” to further the deprivation and extortion of Tavares’ properties and rights, as the Perpetrators got desperate that Tavares was about to sell one of Tavares’ two properties, valued over \$50 million dollars, to pay off the sham BRIDGELoAN/BNY Mellon \$12 million loan. Because of their desperation, the Perpetrators simply stage a sham *Trial* amongst them, to produce two false, invalid and fraudulent judgements, predicated on a [sham settlement with invalid authority](#) from false, invalid and fraudulent Power of Attorneys of Tavares’ Companies Defendants fabricated by Tavares’ attorneys. See The fraudulent [Final Judgment of Foreclosure](#), and the [Final Judgment on Intervenor](#). The Perpetrators, showing conscious of guilt, and shameless disregard for the rule of law and rights, after realizing that the fraudulent Final Judgment of Foreclosure and Final Judgment on Intervenor were issued on an invalid unnoticed sham *Trial*, fraudulently attempt, hours after the fraudulent judgments are fabricated and entered, to file a sham [Notice of Hearing](#) for the sham [Trial](#) that had already taken place. See Sham [Notice of Hearing April 8, 2011 at 9:00 a.m.](#)

COUNTS

Count 574 - 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 575 - 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 576 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 577 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 578 - Allan Lester Langer, Larry Stumpf, Jared Lopez, Black Srebnick Kornspan & Stumpf, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Matthew Paul Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, Alan Samuel Fine, Olten Ayres de Abreu Junior, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. ("BNY Mellon") (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares ("Tavares") of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., and BNY Mellon, showing BNY Mellon repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon's Shareholders, in violation of, 18 U.S.C. §1344.

Count 579 - Allan Lester Langer, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or BSK&S"), Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Matthew Paul Leto, Hall Lamb and Hall, P.A., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Fernando Braghin, Daniel Ades, Bridgeloan Investors, Inc., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, The Bank of New York Mellon, Alan Samuel Fine,

Olten Ayres de Abreu Junior, and other Perpetrators, did knowingly and intentionally, as part of a scheme to deprive and extort U.S. citizen Charles Tavares (“Tavares”) of properties and rights in related proceedings in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC, a Delaware corp.*, Case No. 2009-93058-CA-30 in the 11th Judicial Circuit in and for Miami-Dade County, FL, repeatedly, [make threats to Tavares and Tavares’ family](#), systematically and repeatedly coercing, intimidating, depriving, and extorting Charles Tavares of properties and rights, under color of law, in violation of Title 18 U.S.C. §1951 (Extortion / Hobbs Act).

Count 580 - At all times relevant, Allan Lester Langer, Thomas R. Lehman, Patrick J. Rengstl, LKLS+G, Larry Stumpf, Patrick Rengstl, Alan Fine, Olten Ayres de Abreu, Romulo P. Dantas, Bridgeloan Investors, Inc., Joseph Horn, Ralph Horn, Ricardo Eichenwald, Daniel Ades, Matthew Paul Leto, Hall Lamb and Lamb, P.A., Erica English, H. Eugene Lindsey III, Katz Barron, The Bank of New York Mellon, 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, 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 581 - Jared Michael Lopez (“Lopez”) (JLopez@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), Thomas Ralph Lehman (“Lehman”) (trl@lklaw.com), Patrick J. Rengstl (“Rengstl”) (pjr@lklaw.com), Robin Barrera (“Robin Barrera”) (rb@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Alan S. Fine (“Fine”) (AFine@fine-law.com), Matthew Paul Leto (“Leto”) (MLeto@hlhlawfirm.com), Olten Ayres de Abreu Junior (“Abreu Jr.”) (olten@fbt.ch), Erica Lee English (“English”) (ele@katzbarron.com), Katz Barron Faust Squitero, The Bank of New York Mellon, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares (“Tavares”) of properties and rights upon sham court proceedings, certain [E-mails](#)— to wit: **581 (a)** E-mail on **Monday, April 11, 2011 at 6:17 a.m., From Abreu Jr. To Lehman:** “Subject: RE: Revised Foreclosure Judgment” – The contents of the email has been erased by Lehman to cover up the scheme: **581 (b)** E-mail **April 11, 2011 at 9:57 a.m., From Lopez to Leto, Lehman, and c.c. Rengstl, Robin Barrera:** “Subject: RE: Revised Foreclosure Judgment – Did Judge Langer sign the Judgment? I have not seen it come through. Jared M. Lopez”: **581 (c)** E-mail **April 11, 2011 at 10:00 a.m., From Leto To Lopez, Lehman, and c.c. Rengstl and Robin Barrera:** “RE: Revised Foreclosure Judgment - I just picked up. Will send today. Matthew P. Leto – Hall Lamb and Hall, P.A.”: **581 (d)** E-mail **April 11, 2011 at 2:55 p.m., From Leto To Lopez, Lehman, and cc Rengstl, Robin Barrera, and English:** “Subject: RE: Revised Foreclosure Judgment – Attached are the two judgments entered by the Judge on Friday afternoon: **581 (e)** E-mail **April 11, 2011 at 5:07 p.m., From Lehman To Leto, Lopez, and cc Rengstl, Robin Barrera, and English:** “RE: Revised Foreclosure Judgment – Don’t see the sale date for MUNB sale. Was one set? Thomas R. Lehman LKLS+G”: **581 (f)** E-mail **April 11, 2011 at 5:07 p.m., From Leto To Lehman, Lopez, and cc Rengstl, Robin Barrera, and English:** “RE: Revised Foreclosure Judgment – I have to go back and get a sale date. I didn’t have a check with me”:

581 (g) E-mail **April 11, 2011 at 5:18 p.m., From Lehman To Leto, Lopez, and cc Rengstl, Robin Barrera, and English:** *“RE: Revised Foreclosure Judgment – You are getting it for MUNB’s intervenor judgment? Still going to wait and see before setting Bridgeloan’s two sales? Thomas R. Lehman LKLS+G”*: **581 (h)** E-mail **April 12, 2011 at 11:16 a.m., From Lehman To Fine, cc Abreu Jr.:** *“Subject: Bridgeloan – Attachments: Image001.gif; Final Judgment on Intervenor Complaint for Enforcement of Collateral Assignment of Mortgage (00207977).PDF; Final Judgment of Foreclosure (00207978).PDF; Court – [Ord Grtg CT Mtn to Sever 3rd Pty Compl.pdf](#) – Alan, Attached is the MUNB judgment against Bridgeloan, the Bridgeloan foreclosure judgment and the order severing Charles’ third party claim against Romulo. The latter [order](#) was entered at the calendar call on March 30 but we just received a copy today. The final judgment of MUNB against Bridgeloan allows MUNB to set the first foreclosure sale of its pledge of the note and mortgage. Bridgeloan plans on paying its MUNB debt before the sale of its note and mortgage so the MUNB sale will likely be cancelled. Sale date is being set this week. Bridgeloan judgment sales will be set later, after Bridgeloan either pays its loan to MUNB or lets its mortgage and note be sold at auction. Thomas R. Lehman LKLS+G”*: **581 (i)** E-mail **April 13, 2011 at 11:11 p.m., From Fine To Lehman:** *“Subject: Bridgeloan – Hi Tom; I thought I read an email from you from Monday enclosing a copy of the judgment but now I can’t find it. Please resend it to me as soon as you get a chance. Thanks, Alan Fine”*: **581 (j)** E-mail **April 14, 2011 at 8:18 a.m., From Lehman To Fine:** *“Subject: Bridgeloan – Attachments: image001.gif; image002.jpg – Ok. Thomas R. Lehman”*: and **581 (k)** E-mail **April 14, 2011 at 3:02 p.m., From Lehman To Fine, cc Abreu Jr. and Rengstl:** *“Subject: FW: Bridgeloan – Attachments: ATTO6389.dat; image001.gif; Final Judgment on Intervenor Complaint for Enforcement of Collateral Assignment of Mortgage (00207977).PDF; Final Judgment of Foreclosure (00207978).PDF; Court – Ord Grtg CT Mtn to Sever 3rd Pty Compl.pdf - Alan, Attached is the MUNB judgment against Bridgeloan, the Bridgeloan foreclosure judgment and the order severing Charles’ third party claim against Romulo. The latter order was entered at the calendar call on March 30 but we just received a copy on Monday. The final judgment of MUNB against Bridgeloan allows MUNB to set the first foreclosure sale of its pledge of the note and mortgage. Bridgeloan plans on paying its MUNB debt before the sale of its note and mortgage so the MUNB sale will likely be cancelled. The order setting the sale date is being submitted this week or next, depending on whether Bridgeloan pays off the MUNB debt which its attorney said it would. Bridgeloan judgment sales will be set later, after Bridgeloan either pays its loan to MUNB or lets its mortgage and note be sold at auction. Bridgeloan’s lawyer said that if it paid MUNB next week, then the Bridgeloan sale would likely be set to take place sometime in June. Let me know if you have any questions about the judgment and order. Thomas R. Lehman LKLS+G”*. At all times, all the Perpetrators implicated here, know, in fact and in truth, that the Final Judgment of Foreclosure and the Final Judgment on Intervenor (collectively “Final Judgments”) are false, invalid, and fraudulent, and are predicated on systematic coercion, threats and extortion of Tavares by his own attorneys Lehman, Rengstl, LKLS+G, Stumpf, Lopez, and Black Srebnick (“Tavares’ Attorneys”), and on a patently false, invalid and fraudulent settlement predicated on false and invalid authority from invalid and fraudulent Power of Attorneys of Tavares’ Companies Defendants, secretly fabricated and used by Tavares’ Attorneys to invalidly and fraudulently settle the case against Tavares’ orders not to settle. They also know in truth and in fact that, the false, invalid, and fraudulent Final Judgments are entered in an unnoticed and invalid sham “trial” of April 8, 2011 at 9:00 a.m., and is forever null and void. To further the schemes depriving and extorting Tavares of properties and rights upon sham proceedings in a court of law in the United States, the Perpetrators use E-mails, in violation of Title 18 U.S.C. §1343.

Count 582 - The 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 upon a court of law in the United States of America, by among other things, systematically and repeatedly, under color of law, using artifices of intimidation, coercion, threats, and extortion of U.S. citizen Charles Tavares, fabricating false and fraudulent claims, pleadings, and evidence filed in the Miami Courts, committing forgery and repeatedly making false and fraudulent statements, and corrupting and subverting the Miami Courts, to further the brazen criminal scheme, in violation of, §817.155, F.S. (Fraudulent Practices).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
583	April 13, 2011 at 2:18 P.M.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Norman Stuart Gerstein Claudia Leone
584		§ 241 Conspiracy Against Rights &	Norman S. Gerstein, P.A. Larry Allen Stumpf
585		§ 242 Deprivation Rights Under Color of Law &	Black Kornspan Srebnick & Stumpf Thomas Ralph Lehman
586		§ 1346 Scheme/Artifice to Defraud &	Lauren Vargas Patrick J. Rengstl
587		§ 1343 Wire Fraud &	LKLS+G, LLP The Continued Criminal Enterprise
588		§ 1961 <i>et seq.</i> – RICO &	
589		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
590		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 13, 2011, Claudia Leone (“Claudia Leone”), assistant to corrupt mediator Norman S. Gerstein at Norman S. Gerstein, P.A. (collectively “Gerstein”) (Tax Id. #80-0579681), submits an [E-mail](#) with a sham Invoice #1067-A, for a total amount of \$3,200.00, relating to eight (8) hours of mediation by Gerstein in the Sham Mediation of March 29, 2011 (“Sham Mediation”), in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, by officers of the court. Gerstein is a sham mediator [based at same](#) Plaintiff Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) attorneys Hall, Lamb and Hall, P.A.’s (“Hall & Lamb”) offices at 2665 South Bayshore Drive, Penthouse One, Miami, FL. To further the scheme in sham proceedings in the Miami Courts depriving and extorting Tavares of two (2) separate properties valued more than \$50 million dollars, in lieu of a sham \$12 million dollars loan by BRIDGELoAN and associate The Bank of New York Mellon’s (“BNY Mellon”), together with Tavares’ corrupted attorneys, intentionally caused into default by BRIDGELoAN and BNY Mellon’s systematic torts¹⁷⁰ interfering with the loan, and Tavares’ investors and buyers, the Perpetrators, including Tavares’ own attorneys Larry Allen Stumpf (“Stumpf”), Black Kornspan Srebnick & Stumpf P.A. (“Black Srebnick”), [Thomas R. Lehman](#), (“Lehman”), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), set up the Sham Mediation by Sham Mediator Gerstein at Hall & Lamb’s offices, surrounding Tavares by criminals using their Bar licenses, and position of trust as officers of the court to commit crimes under color of law, to freely coerce, threaten, deprive, and extort¹⁷¹ Tavares of properties and rights.

¹⁷⁰ Amongst other torts, knowingly and intentionally committed by BRIDGELoAN and BNY Mellon to further the scheme, they systematically produce fabricated sham offers and appraisals to devalue Tavares’ Properties securing the sham loan, interfere and threaten Tavares and Tavares’ investors funding the loan, and subvert the proceedings upon the Miami Courts.

¹⁷¹ Unknown to Tavares at the time, the Sham Mediation is part of a grander scheme to fraudulently settle the case against Tavares’ orders not to settle, as Tavares’ corrupt attorneys Lehman, LKLS+G, *et al.*, have secretly fabricated invalid, false, and [fraudulent Power of Attorneys of Tavares’s Companies](#) to secretly and fraudulently settle the case at the Sham Mediation.

COUNTS

Count 583 - 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 18 U.S.C. §371.

Count 584 - 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 585 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 586 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 587 – Norman Stuart Gerstein (“Gerstein”) (nsgmia@aol.com), Claudia Leone (“Claudia Leone”), Larry Allen Stumpf (“Stumpf”) (LStumpf@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Thomas Ralph Lehman (“Lehman”) (trl@lkllaw.com), Patrick J, Rengstl (“Rengstl”) (pjr@lkllaw.com), Lauren Vargas (“Lauren Vargas”) (LVargas@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings of Mediation of March 29, 2011, certain [E-mails](#) of April 13, 2011 – to wit: **587(a) at 2:18 p.m., From Claudia Leone & Gerstein To Stumpf and Black Srebnick:** *“Subject Invoice from Norman S. Gerstein BRIDGELoan INVESTORS – Attachments: Inv_1067A_from_Norman_S_G.pdf – Good afternoon, Thank you for allowing Norman S. Gerstein, P.A. the opportunity to mediate your case. I have attached a statement for the mediation. If you have any questions please feel free to call me or email me back. It would be greatly appreciated if this statement could be paid within thirty days, Claudia Leone Executive Assistant to Norman S. Gerstein, P.A. Offices at Grand Bay Plaza Penthouse One 2665 South Bayshore Drive, Miami, Florida 33133”*; **587(b) on April 18, 2011 at 3:23 p.m., From Rengstl To Stumpf, cc Lehman and Lauren Vargas:** *“Subject: RE: Bridgeloan Mediation Bill – Larry [Stumpf], We received a bill from the mediator (retired Judge Gerstein) for \$1.064. The borrower defendants paid the full mediation deposit of \$500, which has reduced the amount due from our side to Judge Gerstein to \$564 (this was not reflected in the bill, but we called Judge Gerstein’s office to confirm). Do you have an opinion of who should pay the remaining \$564? Patrick J. Rengstl, LKLS+G”*; and **587(b) on April 18, 2011 at 3:33 p.m., From Lauren Vargas to Rengstl:** *“Subject: Bridgeloan Mediation Bill – “BLANK”, showing the Perpetrators continuously using E-mails to further*

the scheme systematically depriving and extorting U.S. citizen Charles Tavares of properties and rights, under color of law, upon subverted proceedings in a court of law in the United States of America, in violation of 18 U.S.C. §1343.

Count 588 - At all times relevant, Norman Stuart Gerstein ("Gerstein") Claudia Leone ("Claudia Leone"), Larry Allen Stumpf ("Stumpf"), Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), Thomas Ralph Lehman ("Lehman") (trl@lkllaw.com), Patrick J, Rengstl ("Rengstl"), Lauren Vargas ("Lauren Vargas"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), 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, 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 Tavares of properties and rights upon sham proceedings in a court of law in the United States of America, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, e.g., Record and [Tavares Sworn Affidavit](#).

Count 589 - Norman Stuart Gerstein ("Gerstein") Claudia Leone ("Claudia Leone"), Larry Allen Stumpf ("Stumpf"), Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), Thomas Ralph Lehman ("Lehman") (trl@lkllaw.com), Patrick J, Rengstl ("Rengstl"), Lauren Vargas ("Lauren Vargas"), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), 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, among other things, systematically and repeatedly, under color of law, using artifices of, Sham Mediation, fraudulent billings of court proceedings of Sham Mediation, and intimidation, coercion, threats, and extortion of U.S. citizen Charles Tavares, fabricating false and fraudulent claims, pleadings, and evidence filed in the Miami Courts, committing forgery and repeatedly making false and fraudulent statements, and corrupting and subverting the Miami Courts, to further the brazen criminal scheme, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 590 – Norman Stuart Gerstein, Larry Allen Stumpf, Thomas Ralph Lehman, Patrick J. Rengstl, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known criminal scheme depriving and extorting Charles Tavares, and Tavares' Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law in the United States of America, furthering major underlying criminals schemes of extortion, systematic forgery and fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States of America, and further depriving the United States and the State of Florida of honest services, 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, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See [The Florida Bar Rules of Professional Conduct](#), Rule 4-8.4, at www.floridabar.org.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

591	April 29, 2011	<u>U. S. CODE TITLE 18</u>	David Applebaum The Bank of New York Mellon Erica Lee English Harold Eugene Lindsey III Shari Ben Moussa Katz Barron Squitero Faust The Continued Criminal Enterprise
592		§ 371 Conspiracy to Defraud the USA &	
593		§ 241 Conspiracy Against Rights &	
594		§ 242 Deprivation Rights Under Color of Law &	
595		§ 1346 Scheme/Artifice to Defraud &	
596		§ 1343 Wire Fraud &	
597		§ 1344 Bank Fraud &	
598		§ 1961 <i>et seq.</i> – RICO & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On April 29, 2011, David Applebaum (“Applebaum”), as President of MUNB Loan Holdings, LLC, a Delaware company a.k.a. The Bank of New York Mellon (“BNY Mellon”), in reckless disregard for the record displayed¹⁷² in the sham styled-case *Bridgeloan Investors, Inc., a Florida corp. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case. No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), showing a criminal scheme by sham lender Bridgeloan Investors, Inc.’s¹⁷³ (“BRIDGELoAN”), together with longtime Facilitator BNY Mellon, systematically¹⁷⁴ depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of two (2) separate properties (“Tavares’ Properties”) and rights, valued over \$50 million dollars, in lieu of a sham \$12 million loan by BRIDGELoAN and BNY Mellon (“Sham Loan”), executes, to further the scheme, a sham [Satisfaction of Collateral Assignment and a sham Satisfaction of Judgment](#) (“BNY Mellon’s Sham Satisfaction”). BNY Mellon, knowingly and intentionally, enables and facilitates BRIDGELoAN’s Criminal Enterprise to use its bank and securities instruments to perpetrate bank/mortgage/securities fraud, tax evasion, and money laundering the proceeds extorted from Tavares’ Properties in sham subverted court proceedings in the United States. At all relevant times, BNY Mellon, its executives, and agents, knew they were committing major crimes against Tavares, the United States, the State of Florida, and against BNY Mellon’s shareholders.

¹⁷² The record displayed shows to any honest outside observer, that, *inter alia*, the invalid and fraudulent Final Judgment of Foreclosure and the Final Judgment on Intervenor BNY Mellon is predicated on an [unnoticed and invalid “trial” of April 8, 2011](#).

¹⁷³ BRIDGELoAN is an entity used by a Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), led by, *inter alia*, Joseph Horn (“Horn”), Ralph Horn (“Ralph”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Daniel Ades (“Ades”), and Nelson Slosbergas (“Slosbergas”), perpetrating, continuously since 1996, *inter alia*, intercontinental money laundering of illicit funds through the United States banking, securities, and real estate markets, mortgage and bank frauds, portfolio tax-free bond frauds, tax frauds, and extortion, showing a clear pattern of continued racketeering.

¹⁷⁴ For years, BRIDGELoAN & BNY Mellon, systematically, commit torts, interfering with Tavares’ loan, Tavares’s investors, and fabricating bogus appraisals and offers to willfully devalue Tavares’ two properties securing the Sham Loan, causing its default, and despite repeated notices to BNY Mellon showing evidence of the frauds, BNY Mellon willfully fails to do the right thing.

COUNTS

Count 591 - 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 592 - 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 593 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 594 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 595 - David Applebaum, MUNB Loan Holdings, LLC, a Delaware company a.k.a. The Bank of New York Mellon ("BNY Mellon"), Erica Lee English, Harold Eugene Lindsey III, Shari Nen Moussa, Katz Barron Faust Squitero, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to defraud, among others, BNY Mellon (NYSE: BK) by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enables and facilitates the deprivation and extortion of borrower Charles Tavares ("Tavares") of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., and BNY Mellon, showing BNY Mellon, and its agents, repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon's Shareholders, in violation of, 18 U.S.C. §1344.

Count 596 - At all times relevant, David Applebaum, MUNB Loan Holdings, LLC, a Delaware company a.k.a. The Bank of New York Mellon ("BNY Mellon"), Erica Lee English, Harold Eugene Lindsey III, Shari Nen Moussa, Katz Barron Faust Squitero, 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, 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 597 - David Applebaum, MUNB Loan Holdings, LLC, a Delaware company a.k.a. The Bank of New York Mellon (“BNY Mellon”), Erica Lee English, Harold Eugene Lindsey III, Shari Nen Moussa, Katz Barron Faust Squitiero, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent, *inter alia*, enabling and facilitating the sham loan to Bridgeloan Investors, Inc. to further acts in an underlying criminal scheme coercing, threatening, depriving, stealing, and extorting U.S. citizen Charles Tavares of properties and rights, under color of law, in sham proceedings upon Miami Courts, subverted by the Perpetrators, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 598 – Erica Lee English, Harold Eugene Lindsey III, Shari Nen Moussa, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies of properties, rights, and honest services upon courts of law, furthering underlying schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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 violation of Florida Bar Rule 4-8.4 MISCONDUCT. See, at www.floridabar.org.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
599	May 5, 2011 and continuing	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl
600		§ 241 Conspiracy Against Rights &	Robin Barrera Lauren Vargas
601		§ 242 Deprivation Rights Under Color of Law &	Carol A. Greco LKLS+G, LLP
602		§ 1346 Scheme/Artifice to Defraud &	The Continued Criminal Enterprise
603		§ 1341 Mail Fraud &	
604		§ 1961 <i>et seq.</i> – RICO &	
605		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
606		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	

On May 5, 2011, U.S. citizen & victim Charles Tavares (“Tavares”), [files](#) a Florida Bar complaint¹⁷⁵ against Tavares’ former personal & corporate attorney Thomas R. Lehman (“Lehman”) at Levine Kellogg Lehman Schneider + Grossman, P.A. (“LKLS+G”) for, *inter alia*, defrauding client Tavares of properties and rights, knowingly and intentionally disobeying client Tavares’ orders not to settle the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), failing to prepare for trial, disobeying client Tavares’ orders to file a notice of bankruptcy for Tavares’ Companies Defendants Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), Miami River Park Marina, Inc. (“MRPM”) (collectively “Tavares’ Companies”), and taking orders from Plaintiff Bridgeloan Investors, Inc. (“BRIDGELoAN”), and opposing Third Party Defendant Romulo Pina Dantas (“Dantas”), and Danta’s fixer and *money bag man*, Brazilian/Swiss attorney Olten Ayres de Abreu Junior (“Abreu Jr.”), fabricating and secretly using false, invalid and fraudulent Power of Attorneys of Tavares’ Companies Defendants to fraudulently settle the case at a sham mediation of March 29, 2011, willfully depriving and extorting Tavares of Properties valued over \$50 million dollars. On August 4, 2011, shameless criminal Lehman [submits a sham letter](#) to Tavares denying the accusations of fraud and malpractice. It is now know that, at all relevant times, Lehman is covertly defrauding client Tavares to further the underlying scheme.¹⁷⁶ On August 13, 2011, Tavares [submits](#) to Lehman & LKLS+G a demand for [refund fees](#) paid by Tavares.

¹⁷⁵ See, *The Florida Bar v. Thomas R. Lehman*, File No. 2011-71,184(III), which, despite clear and abundant evidence of fraud and malpractice by Lehman against client Tavares, is dismissed to cover up the CCE’s continued schemes upon Florida courts.

¹⁷⁶ After Tavares is successfully coerced, threatened, intimidated, and extorted by Tavares’ own attorneys, *inter alia*, Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Lehman, Patrick J. Rengstl, and LKLS+G not to appear at an unnoticed and improperly held staged sham *Trial* of April 8, 2011 depriving Tavares of properties and rights, stops any new business ventures, and starts investigating – to this day, what happened, since at all relevant times, Tavares did not know Tavares is surrounded by criminals using their Florida Bar licenses as guise to deprive and extort, under color of law.

COUNTS

Count 599 - 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 600 - 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 601 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 602 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 603 - Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting U.S. citizen and client Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, a certain [U.S. Postal Mail](#), **603(a)** dated August 4, 2011, from Thomas Ralph Lehman at LKLS+G at 201 South Biscayne Boulevard, 34th Floor, Miami, Florida 33131 to Charles Tavares at Miami River Park Marina and Brickell Village One, LLC at 444 Brickell Avenue, Suite 720, Miami, Florida 33131 knowingly and intentionally, falsely stating that: *"RE: Charles Tavares – The Florida Bar File No. 2011-71,184(III) – Dear Mr. Tavares: I am in receipt of your correspondence dated July 28, 2011. Your accusations of fraud ad malpractice are simply unfounded. I have reviewed your inquiry to the Florida Bar and responded accordingly. I refer you to my response for further explanation regarding my compliance with the rules regulating the Florida Bar. Sincerely, /s/ Thomas R. Lehman – Thomas Ralph Lehman, P.A. – Levine Kellogg Lehman Schneider + Grossman, P.A. (LKLS+G document #FA9583)".* The record indisputably demonstrates Tavares' former personal and corporate attorneys Lehman and LKLS+G's frauds and malpractice, by among other reckless things, secretly fabricating false, invalid and fraudulent Power of Attorneys of client Tavares' Companies Defendants to fraudulently settle the BRDIGELOAN Case against client Tavares' orders not to settle, and by Lehman and LKLS+G selling out to opposing parties BRIDGELoan and Third Party Defendant Romulo Pina Dantas and its fixer Olten Ayres de Abreu Junior ("Abreu Jr."), to covertly defraud, deprive, coerce and extort Tavares of properties and rights in sham proceedings subverted by Lehman, LKLS+G, and other Perpetrators, transmitting, Via U.S. Postal Mail, the aforesaid sham Letter to further the scheme, in violation of, Title 18, U.S.C., §1341.

Count 604 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rensgtl, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Alan Samuel Fine, Olten Ayres de Abreu, 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, 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 605 - Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares’s Companies to fraudulently settle the BRIDGELOAN Case against client Tavares’ orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 606 – Thomas Ralph Lehman, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
607	May 6, 2011 at 1:58 PM	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Robin Barrera
608		§ 241 Conspiracy Against Rights &	Lauren Vargas Carol A. Greco
609		§ 242 Deprivation Rights Under Color of Law &	LKLS+G, LLP Olten Ayres de Abreu Junior
610		§ 1346 Scheme/Artifice to Defraud &	FBT Avocats S.A. (Switzerland) Romulo Pina Dantas
611		§ 1343 Wire Fraud &	Larry Allen Stumpf Black Srebnick Kornspan & Stumpf
612		§ 1961 <i>et seq.</i> – RICO &	Matthew Paul Leto Hall Lamb and Hall, P.A.
613		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	Erica Lee English Katz Barron Faust Squitero
614		Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	The Bank of New York Mellon The Continued Criminal Enterprise

On May 6, 2011, at 1:58 p.m., shameless criminal Thomas Ralph Lehman (“Lehman”), at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS_G”), furthering the scheme¹⁷⁷ depriving and extorting U.S. citizen and client Charles Tavares (“Tavares”) of properties and rights in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), transmits a certain [E-mail](#) to opposing Third-Party Defendant Romulo Pina Dantas’ (“Dantas”) fixer and money bag man Olten Ayres de Abreu Junior (“Abreu Jr.”) (olten@fbt.ch), with PDF files containing a Sham Final Judgment of Foreclosure, Satisfaction of Collateral Assignment, and Satisfaction of MUNB (“BNY Mellon”) Judgment, previously transmitted, on May 6, 2011 at 1:33 p.m., by Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) attorney Matthew P. Leto to Lehman, Tavares, Patrick J. Rengstl, Larry Allen Stumpf, and BNY Mellon’s attorney Erica Lee English at Katz Barron Faust Squitero. The Perpetrators implicated all know in truth and in fact that the Sham Final Judgment of Foreclosure and the Sham Final Judgment on Intervenor MUNB a.k.a. BNY Mellon, is predicated on a false, invalid and fraudulent settlement by BRIDGELOAN, Third Party Defendant Dantas, and Intervenor BNY Mellon to deprive and extort Defendant Tavares of Tavares’ Two Properties valued over \$50 million dollars, falsely and invalidly *agreed* by Tavares’ attorneys LKLS+G, using invalid authority of Tavares’ Companies Defendants from totally false, invalid, and fraudulent Power of Attorneys of Tavares’ Companies Defendants, secretly fabricated by Lehman, LKLS+G, Abreu Jr., *et al.*, to secretly and invalidly settle the BRIDGELOAN Case at a sham Mediation of March 29, 2011. Then, the Perpetrators fearing Tavares is about to sell one of Tavares’ two Properties to pay off the sham BRIDGELOAN/BNY Mellon loan, stage a sham invalid and unnoticed trial on April 8, 2011 at 9:00 a.m. to fabricate the sham Judgments, showing that the Final Judgments are forever null and void.

¹⁷⁷ At all relevant times, Lehman is a shameless criminal using his Florida Bar license as guise to commit crimes, *inter alia*, conning, depriving, and extorting client Tavares of properties and rights, covertly working for BRIDGELOAN’s Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and other opposing parties that **“bought”** Lehman and LKLS+G.

COUNTS

Count 607 - 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 608 - 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 609 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 610 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 611 - Thomas Ralph Lehman ("Lehman") (trl@lkllaw.com), Patrick J, Rengstl ("Rengstl") (pjr@lkllaw.com), Carol C. Greco ("Greco") (CG@lkllaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry Allen Stumpf ("Stumpf") (LStumpf@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), Erica Lee English ("English") (ele@katzbarron.com), Matthew Paul Leto ("Leto") at Hall Lamb and Hall, P.A. ("Hall & Lamb"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Courts"), subverted by the Perpetrators to further the scheme, certain [E-mails](#) of May 6, 2011 – to wit: **611(a) at 1:33 p.m., From Leto To Lehman, cc Tavares, Rengstl, Stumpf, English:** "*Subject Miami River & Brickell Village One Properties – Dear All: Attached is a copy of the (i) recorded satisfaction of judgment pertaining to the MUNB/Bridgeloan judgment; (ii) recorded satisfaction of collateral assignment; and (iii) Final judgment of foreclosure which identifies the sates of sale. The first sale of the Brickell property will be on June 9 and the second sale of the marina will be June 20. Very truly yours, Matthew P. Leto – Hall Lamb and Hall, P.A.*"; and **611(b) at 1:58 p.m., From Lehman To Abreu Jr., cc Greco:** "*Subject: FW: Miami River & Brickell Village One Properties – Attachments: Final Judgment of Foreclosure (00210830).PDF; Satisfaction of Collateral Assignment (00210829).PDF; Satisfaction of MUNB Judgment (00210828).PDF*"; transmitted via E-mail to further the brazen scheme depriving and extorting U.S. citizen, the United States of America, and the State of Florida, in violation of, Title 18, U.S.C., §1343.

Count 612 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rensgtl, Robin Barrera, Carol C. Greco, Lauren Vargas, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Olten Ayres de Abreu Junior, FBT Avocats S.A. (“FBT Avocats”), Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon (“BNY Mellon”), 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, 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 613 - Thomas Ralph Lehman, Patrick J. Rensgtl, Robin Barrera, Carol C. Greco, Lauren Vargas, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Olten Ayres de Abreu, FBT Avocats S.A. (“FBT Avocats”), Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon (“BNY Mellon”), 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares’s Companies to fraudulently settle the BRIDGELoan Case against client Tavares’ orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 614 – Thomas Ralph Lehman, Patrick J. Rensgtl, Larry Allen Stumpf, Jared Michael Lopez, Matthew Paul Leto, Erica Lee English, Harold Eugene Lindsey III, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
615	May 11, 2011 and continuing	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Alan Samuel Fine Alan S. Fine, P.A.
616		§ 241 Conspiracy Against Rights &	Ramon Anzola-Robles Karla Solis
617		§ 242 Deprivation Rights Under Color of Law &	Mirna Almanza Global Corporate Services, Inc.
618		§ 1346 Scheme/Artifice to Defraud &	Anzola-Robles & Asociados Olten Ayres de Abreu Junior
619		§ 1341 Mail Fraud &	FBT Avocats S.A. (Switzerland) Romulo Pina Dantas
620		§ 1343 Wire Fraud &	Marcos Joise Bezerra Menezes Thomas Ralph Lehman
621		§ 1961 <i>et seq.</i> – RICO &	Patrick J. Rengstl LKLS+G, LLP
		FLORIDA STATUTES	Marco Emilio Rojas
622		Title XLVI § 817.155 Fraudulent Practices	The Continued Criminal Enterprise

On May 11, 2011, Alan S. Fine¹⁷⁸ (“Fine”) following [orders](#) from criminal Thomas R. Lehman (“Lehman”), to cover up actions depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, upon sham proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Courts”), vitiated by fraud, [transmits](#), via U.S. Postal Mail, and E-Mail, a false, invalid, and fraudulent *Written Action of the Sole Shareholder and The Sole Director of B.V. One Properties, Inc.* (“**Sham Written Action of Venetian**”), and a sham *Notice of Special Meeting of Members of Brickell Village One, LLC* (“**Notice Board Meeting BV One**”). Both invalid and fraudulent Sham Written Action of Venetian Isles and Notice Board Meeting BV One are purportedly falsely signed by Mirna Almanza (“Mirna Almanza”), in the Republic of Panamá, as Sole Director of Venetian Isles and as President of B. V. One Properties, Inc., without any authority whatsoever over Brickell Village One, LLC, a Florida L.L.C. (“BV One”), B.V. One Properties, Inc., a Florida corp. (“BV”), and Venetian Isles Holdings, Inc., a B.V.I. company (“Venetian Isles”) (collectively “[Tavares’ Companies](#)”)¹⁷⁹. At all relevant times, Tavares, and Tavares only, has the sole legal authority over Tavares’ Companies, and [Tavares never authorized](#), nor authorized anyone to produce the aforesaid patently fraudulent Resolutions.

¹⁷⁸ Fine is a longtime Associate of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), and, at all relevant times, is covertly and fraudulently representing Third Party Romulo Pina Dantas in the BRIDGELoAN Case to further the deprivation and extortion of Tavares’ Properties, and Mirna Almanza is a criminal based at Ramon Anzola-Robles’ offices of Anzola-Robles & Asociados, and Global Corporate Services, Inc. (collectively “Anzola-Robles”), in the Republic of Panamá, and Associate of Brazilian/Swiss reckless attorney and fixer Olten Ayres de Abreu Junior (“Abreu Jr.”), all previously implicated in the [fraudulent fabrication of Sham Power of Attorneys](#) of Tavares’ Companies (“Sham POAs”), secretly used to invalidly and fraudulently settle the BRIDGELoAN Case at [sham mediation](#) of March 29, 2011.

¹⁷⁹ At all relevant times, to this date, Tavares is the sole shareholder, director, president and manager of Tavares’ Companies. The Perpetrators, after been exposed invalidly and fraudulently settling with Sham POAs’, now continue to fabricate more fraudulent resolutions to further the schemes, and to cover up their brazen frauds with more patent frauds, shown on its face, as the Perpetrators falsely and erroneously show Tavares’ 2147 SW 8 Street, LLC, a Florida L.L.C., as a “Member” of BV One.

The Sham Written Action of Venetian Falsely & Invalidly Removing Tavares from Tavares' Companies

“WRITTEN ACTION OF THE SOLE SHAREHOLDER AND THE SOLE DIRECTOR OF B.V. ONE PROPERTIES, INC.

The undersigned being the sole shareholder [¹⁸⁰]and, upon the effect of these resolutions, the sole director of B.V. One Properties, Inc., a corporation organized and existing under the laws of the State of Florida (the “Corporation”), acting pursuant to §§ 607.0704 and 607.0821, Florida Statutes, hereby take the following written action and adopt the following resolutions:

RESOLVED that the sole shareholder hereby removes Charles Tavares as a director of the Corporation, effectively immediately.

FURTHER RESOLVED that the shareholder hereby elects the following individual, effective immediately, to serve as the sole director of the Corporation, until such time as his successor is elected and qualified or until his earlier resignation or removal.

Mirna Almanza

FURTHER RESOLVED that the newly-appointed director, as the sole director, hereby removes Charles Tavares as President and Secretary of the Corporation, effective immediately.

FURTHER RESOLVED that the director elects the following individuals, effective immediately, to serve in the following offices, until their successors are elected and qualified or until their earlier resignation or removal.

Mirna Almanza

President and Secretary

The foregoing resolutions are in compliance with the Articles of Incorporation and Bylaws of the Corporation.

VENETIAN ISLES HOLDINGS, INC.
a British Virgin Islands corporation
Sole Shareholder

By: */s/ “Ineligible Signature”*
ADMINISTRALT MANAGEMENT CORP.

Date: 11th day of May, 2011

/s/ Mirna Almanza
Mirna Almanza – Sole Director
Date: 11th day of May, 2011”.

¹⁸⁰ The Perpetrators all knew, and the record displayed shows that, Charles Tavares (“Tavares”), at all relevant times, is the Sole Shareholder of Venetian Isles Holdings, Inc., a B.V.I. company (“Venetian Isles”), B.V. One Properties, Inc., a Florida corp. (“BV”), Brickell Village One, LLC, a Florida L.L.C. (“BV One”) (collectively “Tavares’ Companies”), and Tavares never authorized the purported unauthorized representatives, or anyone else, to fabricate the Sham Written Action of Venetian Isles. Criminal Fine, following the CCE’s **Omertà Code**, executes Associate Thomas Ralph Lehman’s [orders](#) to cover up the “Corporate Issues” relating to the fraudulent settlement, and fraudulent Final Judgment of Foreclosure and fraudulent Final Judgment on Intervenor BNY Mellon in an unnoticed and invalid sham Trail of April 8, 2011 at 9:00 a.m., in the BRIDGELoan Case, using Romulo Pina Dantas’ fixer and money bag man Swiss/Brazilian attorney Olten Ayres de Abreu Junior and Associate Ramon Anzola-Robles (“Anzola-Robles”), in the Republic of Panama to fabricate additional patently false, invalid, and fraudulent Corporate Resolutions of Tavares’ Companies to hijack the companies. Tavares, upon receiving, on May 11, 2011, the fraudulent Resolutions, repeatedly, via e-mail, facsimile, FedEx, and telephone calls, [submits](#) dozens of requests to Mirna Almanza at Anzola-Robles’s offices demanding a response, *inter alia*, as how and with which authority they believed they could fabricate the fraudulent Resolutions, as Tavares, and Tavares only, has the sole legal authority over Tavares’s Companies. Shameless criminals Anzola-Robles, Mirna Almanza, *et al.*, never responds to the certified received demands from Tavares.

The Sham Notice For a Board Meeting of Tavares' Brickell Village One, LLC, a Florida L.L.C.

“NOTICE [¹⁸¹] OF SPECIAL MEETING OF MEMBERS [¹⁸²] OF BRICKELL VILLAGE ONE, LLC

TO: B.V. One Properties, Inc., Member
Mirna Almanza, President
Credicorp Bank Plaza, 26th Floor - Nicanor de Obarrio Avenue, 50th Street
Panama City, Republic of Panama - Fax: (507) 263-0006

2147 SW 8th LLC [sic], Member [¹⁸³]
Charles Tavares, President
444 Brickell Avenue, Suite 415 - Miami, Florida 33131 - Fax: (305) 371.3677

IBAC Asset Holders, Inc. Member
Charles Tavares, President
444 Brickell Avenue, Suite 415 - Miami, Florida 33131 - Fax: (305) 371.3677

VIA US First Class Mail and Fax

NOTICE IS HEREBY GIVEN that a Special Meeting of the Members of BRICKELL VILLAGE ONE, LLC, a Florida limited liability company (the “Company”), has been called by BV One Properties, Inc., the majority owner of the Company’s membership units.

The Special Meeting of the Members of the Company will be held on Monday, May 23, 2011 at 4:00 p.m. at 255 Alhambra Circle, Suite 850, Coral Gables, 33134 [Alan Samuel Fine’s Offices], to consider and act on the following:

1. To remove Charles Tavares, the initial Manager, as Manager;
2. To elect new Managers to serve until their successors shall be elected and qualifies; and
3. To transact such other business as may properly come before the meeting and any adjournment thereof.

BY ORDER OF THE MAJORITY MEMBER:

B. V. One Properties, Inc.

/s/ Mirna Almanza

Mirna Almanza

Title: President / Secretary

¹⁸¹ The Criminals, predicated on a false and invalid Sham Written Action of May 11, 2011 of Charles Tavares’ Venetian Isles Holdings, Inc., a B.V.I. company (“Venetian”), knowingly and intentionally fabricate, without any proper and legal authority, *inter alia*, a patently invalid and fraudulent Sham Notice of Board Meeting of Tavares’ Brickell Village One, LLC (the “Notice”), showing among other patently fatal defective errors, do not date the Notice. See also, Criminal definition under Merriam-Webster Dictionary: “one who has committed a crime;” “of an illegal act for which someone can be punished by the government.”

¹⁸² The Criminals, to further the criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”) of properties and rights, the State of Florida, and the United States of America of honest services, in reckless disregard for the law, rights, and the truth, recklessly and erroneously, falsely state in the sham Notice that Tavares’ 2147 SW 8 Street, LLC, a Florida limited liability company (“2147”) is a “Member of Brickell Village One, LLC” – which Charles Tavares’ 2147 was never a Member, showing that truth, facts, and the law do not matter to the CCE, as they know that they are untouchable by the law.

¹⁸² The Criminals falsely stating that Charles Tavares’ (“Tavares”) 2147 SW 8 Street, LLC, a Florida limited liability company (“2147”) is a “Member of Brickell Village One, LLC”, cannot even correctly write Tavares’s 2147 proper and correct name.

Criminal Alan Samuel Fine, Knowingly and Intentionally, to Further the Scheme Extorting U.S. Citizen Charles Tavares of Properties and Rights, Transmits Via U.S. Postal Mail the Sham Documents

COUNT #1 OF MAIL FRAUD – Title 18, United States Code, Section 1341

From "ALAN S. FINE, P.A.
ATTORNEYS AND COUNSELORS
255 Alhambra Circle, Suite 850
Coral Gables, Florida 33134

\$0.44
US POSTAGE – FIRST CLASS
062S0006910403
33134

[To]
IBAC Asset Holders, Inc., Member
Charles Tavares, President
444 Brickell Avenue, Suite 415
Miami, FL 33131

33131+2405".

COUNT #2 OF MAIL FRAUD – Title 18, United States Code, Section 1341

From "ALAN S. FINE, P.A.
ATTORNEYS AND COUNSELORS
255 Alhambra Circle, Suite 850
Coral Gables, Florida 33134

\$0.44
US POSTAGE – FIRST CLASS
062S0006910403
33134

[To]
2147 SW 8th LLC [sic], Member
Charles Tavares, President
444 Brickell Avenue, Suite 415
Miami, FL 33131

33131+2405".

COUNT #3 OF MAIL FRAUD – Title 18, United States Code, Section 1341

From "ALAN S. FINE, P.A.
ATTORNEYS AND COUNSELORS
255 Alhambra Circle, Suite 850
Coral Gables, Florida 33134

\$0.44
US POSTAGE – FIRST CLASS
062S0006910403
33134

[To]
Charles Tavares, President
444 Brickell Avenue, Suite 415
Miami, FL 33131

33131+2405".

COUNTS

Count 615 - 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 616 - 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 617 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 618 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 619 - Alan Samuel Fine, Alan S. Fine, P.A. (collectively "Fine"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting U.S. citizen and client Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, transmitting correspondences containing certain sham Written Action of the Sole Shareholder and the Sole Director of B.V. One Properties, Inc. and Notice of Special Meeting of Members of Brickell Village One, LLC, that Fine knows is invalid and fraudulent, to further an underlying scheme depriving and extorting U.S. citizen Charles Tavares of properties and rights, Via U. S. Postal Mail: **619(a)** dated May 11, 2011, **From** ALAN S. FINE, P.A. Attorneys and Counselors at 255 Alhambra Circle, Suite 850, Coral Gables, Florida 33131 **TO** IBAC Asset Holders, Inc., Member - Charles Tavares, President, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131; **619(b)** dated May 11, 2011, **From** ALAN S. FINE, P.A. Attorneys and Counselors at 255 Alhambra Circle, Suite 850, Coral Gables, Florida 33131 **TO** 2147 SW 8th LLC [sic], Member - Charles Tavares, President, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131; and **619(c)** dated May 11, 2011, **From** ALAN S. FINE, P.A. Attorneys and Counselors at 255 Alhambra Circle, Suite 850, Coral Gables, Florida 33131 **TO** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131", in violation of Title 18, United States Code, Section 1341.

Count 620 - Alan Samuel Fine, Alan S. Fine (collectively "Fine") (AFine@fine-law.com), Romulo Pina Dantas ("Dantas") (romulo@bellsouth.net & robbinho@totalplus.com.br), Marcos Jose Bezerra de Menezes ("Menezes") (mm@totalplus.com.br), Olten Ayres de Abreu Junior ("Abreu Jr.") (olten@fbt.ch), Marco Emilio Rojas ("Rojas") (mrojas@rsmiami.com), Thomas Ralph Lehman

("Lehman") (trl@lklaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry A. Stumpf ("Stumpf") (LStumpf@royblack.com), Jared M. Lopez ("Lopez")(JLopez@royblack.com), Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or "BSK&S"), Matthew Paul Leto ("Leto") at Hall Lamb and Hall, P.A. ("Hall & Lamb"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Courts"), subverted by the Perpetrators to further the scheme, certain E-mails of May 11 through May 13, 2011 – to wit: **620(a) May 12, 2011 at 4:08 p.m., From Fine To Tavares, cc Lehman:** "Subject: Written Action – Sent on behalf of Venetian Isles Holdings, Inc. and B.V. One Properties, Inc. Alan S. Fine, Esquire Alan S. Fine, P.A.": and **620(b) May 12, 2011 at 5:01 p.m., From Tavares To Fine, Rojas, Stumpf, Lopez, Abreu Jr., Dantas, Menezes, Leto, cc. Lehman:** "Subject: Written Action – Dear Alan Samuel Fine & Gentlemen, Good afternoon. This is to confirm, I have received today, May 11, 2011, another fraudulently produced documents regarding "B.V. One Properties, Inc.", which in addition to the already documented evidence of a coordinated and deliberate actions of fraud, forgery, conspiracy to defraud which further shows the ongoing criminal enterprise been orchestrated by you, which certainly falls under Chapter 96 of Title 18 of the United States Code, 18, U.S.C. / 1961-1968, against myself and which has also defrauded the Eleventh Judicial Circuit in Miami-Dade along with the Honorable Judge Langer Lester [¹⁸³], by producing and presenting to his Court a fraudulent settlement on Case No, 09-93058 CA 30 [the BRIDGELoAN Case]. Therefore, I would like to inform you formally, that I do not recognize nor find it to be truthful or legal said documents as well as the previous fraudulent Power of Attorneys which attorney Thomas R. Lehman and others have used to defraud me and the companies, as well as the United States of America Judicial System. Therefore the requested meeting is hereby not authorized nor recognized. I have taken proper actions in requiring investigations with the Florida BAR, Florida Office of Financial Regulation, Comptroller of the Currency, The Swiss FEDPOL, Federal and Justice Police, Brazilian Courts and since this is certainly a very sophisticated criminal enterprise, I have contacted the Federal Bureau of Investigations to present documentation and evidence beyond any doubts of this "business Modus Operandi"; reminiscent from the Madoff, Rothstein and Rajaratnam era. My GOD bring justice to all of us. Sincerely, Charles Tavares, as President, Director, Managing Partner for B.V. Properties, Inc. For Brickell Village One, LLC"; **620(c) May 13, 2011 at 3:19 p.m., From Fine To Tavares, Rojas, Stumpf, Lopez, Abreu Jr., Dantas, Menezes, Leto, Rengstl cc. Lehman:** "Subject: Written Action – Dear Mr. Tavares; Thank you for email of May 12, 2011 at 5:01 p.m. acknowledging receipt of your removal as an officer and director of B.V. Properties, Inc. Your refusal to acknowledge the legitimacy of the act by the sole shareholder of B.V. Properties One, Inc., Venetian Isles Holdings, Inc., is ill-informed and of no effect. If you know of a reason why Venetian Isles Holdings, Inc. cannot take the act it took, I am interested in learning of it. Otherwise, your position is absurd as the allegations of wrongdoing that you have made in the same email. I caution you to seek legal representation before your further expose yourself to liability for defamation for your wild reckless allegations. Sincerely, Alan S. Fine, Esquire Alan S. Fine, P.A. 255 Alhambra Circle, Suite 850, Coral Gables Florida 33134"; and **620(d) May 13, 2011**

¹⁸³ Unknown to Tavares at the time, Judge Allan Lester Langer ("Langer"), presiding the sham proceedings, at all relevant times, is corrupted, recklessly furthering the scheme extorting Tavares of properties and rights, under color of law.

at 4:22 p.m., From Tavares, To Fine, Rojas, Stumpf, Lopez, Abreu Jr., Dantas, Menezes, Leto, Rensgtl, cc. Lehman: *"Subject: Alan Samuel Fine – Republic of Panama Fraudulent Documents – Miami, 5.1.11 - Dear Alan Samuel Fine, As opposed to your position accepting and knowingly acting solely upon fake, forged and unlawful documents from Panama, known to you and others to be a gross forge and fraudulent, I am including therein, again, just a few documentation that not only you sent us, clearly been perpetrated thru a coordinated conspiracy to defraud me and the United States of America Judicial System, which has been temporally been accomplished, I may say, but undisputed evidence of the facts I stated before and confirming further the unlawful and illicit acts you are hereby confirming to be part of it. Furthermore, I am including attachment therein (letter sent to you via email and certified mail RRR #7011 0110 0000 9659 0837), which was delivered to you almost a month ago, requesting your confirmation as to if you were representing Romulo Pina Dantas on this matter or not, and not surprisingly, I may ad, a month later, you 'sent a piece of paper' which I can only call it 'Minnie Mouse! The Mickel Mouse document was the 'Thomas R. Lehman' POA which you are, now trying to create some shred of resemblance to a forged document. Sorry, but I cannot explain in any other way these 'documents' which defy dumbness and stupidity and which were grossly forged and falsified. What is next [¹⁸⁴]? Again, I would like to ask you, who or what obscure organization are you acting upon or representing? At least we all would know what to call it! As for defamation, I am more afraid of having Osama Bin Laden filing a defamation suit against me for calling him a bad guy that you, because I am showing you and whoever cares for the truth, evidence of these incredible and illicit acts. By doing that, you are doing what the Communists do in communist countries, which is to have 'an authority', like yourself, get a piece of paper saying to a homeowner that his or her home is not his or hers, because a grossly fraudulent document, and then, you continue doing over and over! This is still America not a little Communist Country! I not only welcome Justice but I embrace it and there is why I am doing what I am doing. And again for the record, the documents and actions you represent are deemed to be a fraud and therefore not to be considered. Charles Tavares as Managing Partner, President, Director for Brickell Village One, LLC & Miami River Park Marina, Inc."* Fine's transmission of fabricated fraudulent Corporate Resolutions, and threats, via E-mail, to further the scheme depriving and extorting U.S. citizen Charles Tavares, the United States of America, and the State of Florida, is in violation of, Title 18, U.S.C., §1343.

Count 621 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rensgtl, Robin Barrera, Carol C. Greco, Lauren Vargas, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), Olten Ayres de Abreu Junior, FBT Avocats, S.A. ("FBT Avocats"), Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon ("BNY Mellon"), 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

¹⁸⁴ BRIDGELOAN's CCE, after U.S. citizen Charles Tavares ("Tavares") starts to uncover and expose the massive brazen frauds depriving and extorting Tavares upon subverted Miami Courts, launch a continued and ongoing barrage of sham lawsuits and retaliatory actions against Tavares to financially destroy, falsely incriminate, and to silence Tavares, see [Related Cases](#).

witnesses, coercing, extorting, acts involving theft, 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 622 - Alan Samuel Fine, Romulo Pina Dantas, Marcos Jose Bezerra de Menezes, Olten Ayres de Abreu Junior, FBT Avocats S.A. (“FBT Avocats”), Marco Emilio Rojas, Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider, LLP (“LKLS+G”), Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), Matthew Paul Leto, Hall Lamb and Hall, P.A., and other Perpetrators implicated, knowingly and intentionally, systematically conspire and 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 to defraud, fabricating false, invalid, and fraudulent Power of Attorneys, and indicial of membership interest of Charles Tavares’ Companies Venetian Isles Holdings, Inc., B.V. One Properties, Inc., Brickell Village One, LLC, to fraudulently settle the BRIDGELoAN Case against client Tavares’ orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, and upon successfully depriving and extorting Charles Tavares of properties and rights, under color of law, upon subverted sham court proceedings, continue to commit fraudulent acts to prevent justice and to cover up the scheme, in violation of, §817.155, F.S. (Fraudulent Practices).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
623	May 19, 2011 and continuing	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman LKLS+G, LLP Marco Emilio Rojas Olten Ayres de Abreu Junior FBT Avocats S.A. The Continued Criminal Enterprise
624		§ 241 Conspiracy Against Rights &	
625		§ 242 Deprivation Rights Under Color of Law &	
626		§ 1346 Scheme/Artifice to Defraud &	
627		§ 1343 Wire Fraud &	
628		§ 1961 <i>et seq.</i> – RICO &	
629		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

On May 19, 2011, criminal Thomas R. Lehman¹⁸⁵ (“Lehman”), at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), following a scheme causing two invalid and fraudulent Final Judgments in a staged sham Trial of April 8, 2011, extorting U.S. citizen Charles Tavares (“Tavares”) of properties and rights,¹⁸⁶ under color of law, in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, continuing to falsely represent Tavares’ Companies Defendants Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”) (collectively “Tavares’ Companies”), after Tavares fired Lehman and LKLS+G, and after Tavares’ Florida Bar complaint of May 5, 2011, conspiring to further, and to cover up the scheme, *inter alia*, fabricating false, invalid and fraudulent Power of Attorneys of Tavares’ Companies to secretly and fraudulently settle the BRIDGELOAN Case, transmits certain [E-Mails](#) to Associate¹⁸⁷ Marco Emilio Rojas (“Rojas”), and Olten Ayres de Abreu Junior (“Abreu Jr.”), relating to artifices to fabricate more invalid and fraudulent Resolutions of Tavares’ Companies to hijack Tavares’ Companies after they are exposed.

¹⁸⁵ Unknown to Tavares, Lehman, at all relevant times, is a criminal using his Florida Bar license as guise to commit crimes, with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), against clients. Tavares first engaged Lehman in 2005, to represent Tavares in an auction to buy a certain 9 Acres Miami River property (“Miami River Marina Property”) being sold upon the Bankruptcy Court in Miami, FL. From 2005, through 2011, Lehman represented Tavares and Tavares’ companies, and as part of the underlying scheme, falsely befriends Tavares, and Tavares’ family in order to gain Tavares’ trust to easily con, deprive, and extort Tavares in the sham BRIDGELOAN Case.

¹⁸⁶ Tavares is deprived and extorted of two separate properties, the BV One and 2147’s Brickell Buildings (“Brickell Buildings”), and the Miami River Marina Property, valued over \$50 million dollars, in an unnoticed and improperly held sham trial on April 8, 2011 at 9:00 a.m., producing an invalid and fraudulent Final Judgment of Foreclosure and a Final Judgment on Intervenor MUNB Loan Holdings, LLC (a.k.a. “BNY Mellon”), predicated on a false, invalid and fraudulent settlement, further predicated on false, invalid and fraudulent Power of Attorneys of Tavares’ Companies Defendants secretly fabricated, and used by criminals Lehman, LKLS+G, BRIDGELOAN, and BNY Mellon, to invalidly and fraudulently settle against Tavares’ orders not to settle.

¹⁸⁷ Criminal Rojas, is an Associate of BRIDGELOAN’s CCE, and for years, falsely represents client Tavares, to further the underlying scheme to deprive and extort Tavares of all properties and rights. See [Tavares’ Affidavit](#) and [Related Cases](#).

COUNTS

Count 623 - 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 624 - 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 625 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 626 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 627 - Thomas Ralph Lehman ("Lehman") (trl@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Marco Emilio Rojas ("Rojas") (mrojas@rsmiami.com), Olten Ayres de Abreu Junior ("Abreu Jr.") (olten@fbt.ch), at FBT Avocats, Geneve, Switzerland ("FBT Avocats"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Courts"), subverted by the Perpetrators to further the scheme, certain [E-mails](#) of May 19, 2011 – to wit: **627(a) at 4:56 a.m., From Abreu Jr. To Lehman:** "*Subject: RE: Miami River – Dear Tom [Lehman], Marco Rojas may have delivered the shares to Charles [Tavares], eventhough [sic] there is custody doc. With Romulo [Dantas], what can arise from that" Rgds., Olten [Abreu Jr.]*"; **627(b) at 10:13 a.m., From Abreu Jr. To Lehman:** "*Subject: FW: Miami River - - The content of this Message has been deliberately erased by Lehman to cover up the crimes;* **627(c) at 2:49 p.m. (10:49 a.m. EST), From Lehman To Abreu Jr.:** "*Subject: RE: RE: Miami River – The content of this Message has been deliberately erased by Lehman to cover up the crimes; and **627(d) at 1:31 p.m., From Lehman To Rojas, cc Abreu Jr.:** "*Subject: FW: Miami River - Marco [Rojas], Olten Abreu, the attorney for the controlling shareholders of the companies, asked the question below about the shares and other corporate matters. Are you able to answer his questions? Thomas R. Lehman*", transmitting, via E-mail, to further schemes depriving and extorting U.S. citizen Charles Tavares of properties and rights, and the United States of America, and the State of Florida of, *inter alia*, honest services upon courts of law, in violation of, Title 18, U.S.C., §1343.*

Count 628 - At all times relevant, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Olten Ayres de Abreu Junior, FBT Avocats S.A., in Geneve Switzerland, (“FBT Avocats”), Marco Emilio Rojas, R&S International Law Group (“R&S”), 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, 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 629 - Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Olten Ayres de Abreu Junior, FBT Avocats S.A., in Geneve Switzerland, (“FBT Avocats”), Marco Emilio Rojas, R&S International Law Group (“R&S”), 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares’s Companies to fraudulently settle the BRIDGELoan Case against client Tavares’ orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE VIOLATIONS PERPETRATORS

630	May 25, 2011	<u>U. S. CODE TITLE 18</u>	Allan Lester Langer Miami Courts The Continued Criminal Enterprise
631		§ 371 Conspiracy to Defraud the USA &	
632		§ 241 Conspiracy Against Rights &	
633		§ 242 Deprivation Rights Under Color of Law &	
634		§ 1346 Scheme/Artifice to Defraud &	
635		§ 1341 Mail Fraud &	
636		§ 1961 <i>et seq.</i> – RICO &	
637	<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>FLORIDA CODE OF JUDICIAL CONDUCT</u> Violations of Canons 1, 2, and 3		

On May 25, 2011, after U.S. citizen and victim Charles Tavares (“Tavares”) started to uncover and expose massive frauds upon the court, by officers of the court, causing Tavares’ to be deprived and extorted of rights, and two properties valued over \$50 million dollars in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case) in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), by,¹⁸⁸ *inter alia*, Tavares’ attorneys Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), presiding Judge Allan Lester Langer (“Judge Langer”), unknown to Tavares at the time, a criminal implicated¹⁸⁹ in the brazen scheme, [transmits](#), via U.S. Postal Mail, to Tavares, a letter, *inter alia*, confirming receiving Tavares’ letter and supporting evidence of May 16, 2011. Corrupt Judge Langer, disingenuously, despite the indisputable evidence of fraud upon his court by officers of the court, advises Tavares to take Tavares’ complaints to the Florida Bar, and submitting copies to, LKLS+G, Erica L. English (“English”) at Katz Barron Faust Squitiero (“Katz Barron”), Matthew Paul Leto (“Leto”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), Jorge L. Fors (“Fors”), and Larry Allen Stumpf (“Stumpf”), at Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), further stating in the letter: “NOTE: *The package that Mr. Tavares sent me is in my office if any of the other parties would like to review it.*”

¹⁸⁸ Unknown to Tavares at the time, the sham BRIDGELOAN Case is a sophisticated scheme set up by Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), with BRIDGELOAN’s Associates Marco Emilio Rojas (“Rojas”), Lehman, *et al.*, for years, falsely representing Tavares, and Tavares’ Companies, while covertly and secretly, conning, coercing, stealing, depriving, and extorting Tavares of properties and rights, and BRIDGELOAN has **corrupted and subverted all officers of the court in the BRIDGELOAN Case** to further the brazen scheme depriving and extorting Tavares of properties and rights valued over \$50 million dollars in sham proceedings upon subverted Miami Courts. *See Related Cases.*

¹⁸⁹ Judge Langer is continuously implicated in the schemes, willfully extorting Tavares of rights and properties, under color of law, in subverted proceedings, and, *inter alia*, presides an unnoticed and improperly held sham *Trial* of April 8, 2011, willfully entering invalid and fraudulent Final Judgments of Foreclosure and Judgment on Intervenor, to further an invalid & fraudulent settlement, further predicated on authority from fraudulent Power of Attorneys of Tavares’ companies. *See also Related Cases.*

COUNTS

Count 630 - 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 631 - 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 632 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 633 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 634 - Shameless corrupt Judge Allan Lester Langer (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), 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”) of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, transmitting a correspondence containing a certain [sham Correspondence Letter](#) disingenuously coercing Tavares not to seek relief from the Miami Courts, *inter alia*, from the intimidation, threats, deprivation, and extortion of Tavares’, causing the deprivation and extortion of Tavares’ properties and rights valued over \$50 million dollars, in massive frauds upon the court by officers of the court in the BRIDGEOAN Case, Via U. S. Postal Mail: **634(a)** dated May 25, 2011, **From** Miami Courts Circuit Judge Lester Langer **TO** Charles Tavares, President, Miami River Park Marina, Inc., at 444 Brickell Avenue, Suite 415, Miami, Florida 33131; **634(b)** dated May 25, 2011, **From** Miami Courts Circuit Judge Lester Langer **TO** Levine Kellogg Lehman Schneider + Grossman, LLP at 201 South Biscayne Boulevard, 34th Floor, Miami, FL 33131; **634(c)** dated May 25, 2011, **From** Miami Courts Circuit Judge Lester Langer **TO** Erica L. English at Katz Barron Faust Squitiero at 2699 Bayshore Drive, 7th Floor, Miami, FL 33133; **634(d)** dated May 25, 2011, **From** Miami Courts Circuit Judge Lester Langer **TO** Matthew P. Leto at Hall Lamb and Hall, P.A. at 2665 South Bayshore Drive, PH-1, Miami, FL 33133; **634(e)** dated May 25, 2011, **From** Miami Courts Circuit Judge Lester Langer **TO** Jorge L. Fors, Esq., at 1108 Ponce de Leon Boulevard, Coral Gables, FL 33134; and **634(f)** dated May 25, 2011, **From** Miami Courts Circuit Judge Lester Langer **TO** Larry A. Stumpf, at Black Srebnick Kornspan & Stumpf, P.A., at 201 South Biscayne Blvd., Suite 1300, Miami, FL 33131, furthering the scheme, in violation of, Title 18, U.S.C., Section 1341.

Count 635 - At all times relevant, shameless corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort Charles Tavares (“Tavares”), and Tavares’ Companies, influencing witnesses and other officers of the court, coercing, extorting, acts involving theft, 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 636 - Shameless corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, deprive and extort, holding and presiding sham hearings and proceedings to enter sham Orders and Final Judgments predicated on a sham unnoticed and invalid staged Trial of April 8, 2011, intimidating, coercing, and extorting Tavares, and other officers of the courts, to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 637 – Shameless corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), 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 U.S. citizen Charles Tavares’ (“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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE VIOLATIONS PERPETRATORS

638	June 6, 2011	<u>U. S. CODE TITLE 18</u>	Larry Allen Stumpf Jared Michael Lopez Black Srebnick Kornspan & Stumpf The Continued Criminal Enterprise
639		§ 371 Conspiracy to Defraud the USA &	
640		§ 241 Conspiracy Against Rights &	
641		§ 242 Deprivation Rights Under Color of Law &	
642		§ 1346 Scheme/Artifice to Defraud &	
643		§ 1343 Wire Fraud &	
644		§ 1961 <i>et seq.</i> – RICO &	
645		<u>FLORIDA STATUTES</u>	
		Title XLVI § 817.155 Fraudulent Practices &	
		<u>Florida Bar Rules of Professional Conduct</u>	
	Misconduct – Rule 4-8.4 (a)(b)(c)(d)		

On June 6, 2011, Larry A. Stumpf (“Stumpf”), Jared M. Lopez (“Lopez”), and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&”), criminals using their Florida Bar licenses to, *e.g.*, con, coerce, threaten, and intimidate client U.S. citizen Charles Tavares (“Tavares”), in furtherance of an underlying scheme extorting Tavares of properties and rights valued over \$50 million dollars in the styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), transmit, Via E-Mail, to further the scheme, a [fraudulent Invoice](#) for **\$99,850.46 in sham fees** in the BRIDGELoAN Case. It is now¹⁹⁰ known that, at all relevant times, Tavares’ attorneys Black Srebnick are corrupted and **bought** by opposing parties Romulo Pina Dantas (“Dantas”), and Dantas’ *fixer* Olten Ayres de Abreu Junior (“Abreu Jr.”), and together with Bridgeloan Investors, Inc.¹⁹¹ (“BRIDGELoAN”), conspire to deprive and extort Tavares of two properties valued over \$50 million dollars, in lieu of a \$12 million dollars BRIDGELoAN and The Bank of New York Mellon Bank sham loan (“BNY Mellon”), intentionally caused into default by the Criminal Enterprise, as part of the underlying scheme to extort Tavares upon subverted Courts.

¹⁹⁰ Tavares, only upon discovery in late 2013, in one the [Related Cases](#), *Charles Tavares, Brickell Village One, and 2147 SW 8 Street, LLC v. Thomas Ralph Lehman and Levine Kellogg Lehman Schneider + Grossman, LLP*, Case No. 2013-12223-CA-40 (“Lehman & LKLS+G Fraud & Malpractice Suit”), starts to uncover that Tavares’ attorneys Stumpf, Lopez, and Black Srebnick are also corrupted and **bought** by opposing parties in the BRIDGELoAN Case, together with Tavares’ co-counsels Thomas R. Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”).

¹⁹¹ BRIDGELoAN is an entity used by Joseph Horn’s Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion. On April 6, 2011, at 10:00 a.m., at Black Srebnick’s offices, Stumpf and Lopez discloses that Tavares is being deprived and extorted by a **Criminal Enterprise**, and that Tavares’ co-counsels Lehman, LKLS+G are **bought**, and have fraudulently settled the case against Tavares’ orders not to settle, and **there is nothing Black Srebnick can do to protect client Tavares** and preserve the rule of law, and that, **Tavares should accept quietly the extortion to preserve future claims, and not go to expose the frauds upon the courts by officers of the court** in an unnoticed **staged sham Trial of April 8, 2011**, when the criminals, together with corrupt Judge Lester Langer, shamelessly produce Final void Judgments predicated on the fraudulent settlement.

COUNTS

Count 638 - 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 639 - 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 640 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 641 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 642 - Corrupt Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick" or BSK&S"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, depriving, and extorting client Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Courts"), subverted by the Perpetrators to further the scheme, transmit, Via E-mail, a [certain email](#) containing a Sham Invoice #4 for Account #56.01 ("Tavares"), of June 6, 2011 – to wit: **642(a) From Black Srebnick To Tavares: Subject: Invoice June 6, 2011, containing a Sham Invoice for fraudulent legal services in the amount of \$99,850.46, by Black Srebnick to client Tavares**, when in truth and in fact, Black Srebnick is, at all relevant times, covertly conning, coercing, intimidating, threatening, defrauding, and extorting Tavares of properties and rights in the BRIDGELoAN Case. Black Srebnick's transmission, Via E-mail, of the known fraudulent E-mail containing the known sham invoice, is in violation of, Title 18, U.S.C., §1343.

Count 643 - At all times relevant, corrupt Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), 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, conning, coercing, intimidating, threatening, and extorting client Charles Tavares, acts involving theft, 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 644 - Corrupt Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares’s Companies to fraudulently settle the BRIDGELoan Case against client Tavares’ orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 645 – Corrupt Larry Allen Stumpf, Jared Michael Lopez, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

646	June 13 , 2011	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation Rights Under Color of Law & § 1346 Scheme/Artifice to Defraud & § 1341 Mail Fraud & § 1961 <i>et seq.</i> – RICO & FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)	Larry Allen Stumpf Jared Michael Lopez Joshua Shore Black Srebnick Kornspan & Stumpf The Continued Criminal Enterprise
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On June 13, 2011, Larry A. Stumpf (“Stumpf”), Jared M. Lopez (“Lopez”), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&”), criminals using their Florida Bar licenses to, *e.g.*, con, coerce, threaten, and intimidate client U.S. citizen Charles Tavares (“Tavares”), in furtherance of an underlying scheme extorting Tavares of properties and rights valued over \$50 million dollars in the styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), transmit, to further the extortion, Via U.S. Postal Mail, a [Notice of Withdraw](#) (“**Black Srebnick Notice Withdraw**”), after causing the successful deprivation and extortion of client Tavares, and the sham sale of Tavares’ Brickell Buildings. Tavares’ attorneys Black Srebnick are corrupted and **bought** by opposing parties Romulo Pina Dantas (“Dantas”), and Dantas’ fixer Olten Ayres de Abreu Junior (“Abreu Jr.”), and together with Bridgeloan Investors, Inc.¹⁹² (“BRIDGELoAN”), conspire to deprive and extort Tavares of two properties valued in excess of \$50 million dollars, in lieu of a \$12 million dollars BRIDGELoAN and The Bank of New York Mellon Bank sham loan (“BNY Mellon”), intentionally caused into default by the Criminal Enterprise, as part of the underlying scheme to extort Tavares upon the Miami Courts. It is now know that, *inter alia*, at all relevant times, Tavares’ attorneys Black Srebnick, while charging client Tavares over \$111,000.00 in just over three (03) months of fraudulent services, are **bought**, and covertly working to extort Tavares.

¹⁹² BRIDGELoAN is an entity used by Joseph Horn’s Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion. On April 6, 2011, at 10:00 a.m., at Black Srebnick’s offices, Stumpf and Lopez discloses that Tavares is being deprived and extorted by a **Criminal Enterprise**, that Tavares’ co-counsels Lehman, LKLS+G are **bought**, and have fraudulently settled the case against Tavares’ orders not to settle, and that, **there is nothing Black Srebnick can do to protect client Tavares** and preserve the rule of law, and **Tavares should accept quietly the extortion to preserve future claims, and not go to expose the frauds upon the courts by officers of the court** in an unnoticed **staged sham Trial of April 8, 2011** when the Perpetrators, with corrupt Judge Lester Langer shamelessly produce Final void Judgments predicated on a fraudulent settlement, and sham trial.

COUNTS

Count 646 - 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 647 - 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 648 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 649 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 650 - Corrupt Larry Allen Stumpf, Jared Michael Lopez, Joshua Shore, Black Srebnick Kornspan & Stumpf, P.A. at 201 S. Biscayne Boulevard, Suite 1300, Miami, FL 33131 ("Black Srebnick" or BSK&S"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, conning, coercing, intimidating, threatening, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Court"), transmitting, Via U.S. Postal Mail, on June 13, 2011, a [certain correspondence](#) containing **Black Srebnick Notice of Withdraw** in representing client and victim U.S. citizen Charles Tavares ("Tavares"), after systematically conning, coercing, intimidating, threatening, depriving, and successfully extorting Tavares of properties and rights upon sham proceedings subverted by officers of the court, to wit - **650(a) From** Larry A. Stumpf at Black Srebnick **TO** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131: **650(b) From** Larry A. Stumpf at Black Srebnick **TO** Matthew P. Leto, Esq., at Hall Lamb and Hall, P.A., at 2665 S. Bayshore Drive, Penthouse 1, Miami, FL 33133; **650(c) From** Larry A. Stumpf at Black Srebnick **TO** Patrick J. Rengstl, Esq., at Levine Kellogg Lehman Schneider + Grossman, LLP, at 201 S. Biscayne Blvd., 34th Floor, Miami, FL 33131; **650(d) From** Larry A. Stumpf at Black Srebnick **TO** Jorge L. Fors, Esq., at Jorge L. Fors, P.A., at 1108 Ponce de Leon, Coral Gables, FL 33134: and, **650(e) From** Larry A. Stumpf at Black Srebnick **TO** Erica L. English, Esq., at Katz Barron Faust Squitero, at 2699 South Bayshore Dr., 7th Floor, Miami, FL 33133, in furtherance of the scheme, and in violation of, Title 18, U.S.C., § 1341.

Count 651 - At all times relevant, corrupt Larry Allen Stumpf, Jared Michael Lopez, Joshua Shore, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), 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, conning, coercing, threatening, intimidating, depriving and extorting client Charles Tavares, acts involving theft, 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 652 - Corrupt Larry Allen Stumpf, Jared Michael Lopez, Joshua Shore, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or BSK&S”), 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares’s Companies to fraudulently settle the BRIDGELoAN Case against client Tavares’ orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 653 – Corrupt Larry Allen Stumpf, Jared Michael Lopez, Joshua Shore, and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

654	From June 10, through June 30, 2011	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl
655		§ 241 Conspiracy Against Rights &	Carol A. Greco LKLS+G, LLP
656		§ 242 Deprivation Rights Under Color of Law &	Olten Ayres de Abreu Junior FBT Avocats S.A.
657		§ 1346 Scheme/Artifice to Defraud &	The Continued Criminal Enterprise
658		§ 1343 Wire Fraud &	
659		§ 1961 <i>et seq.</i> – RICO &	
660		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

From June 10, through June 30, 2011, criminals Thomas R. Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), and Carol A. Greco (“Carol Greco”), at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), together with *fixer* Olten Ayres de Abreu Junior (“Abreu Jr.”), after successfully depriving and extorting¹⁹³ U.S. citizen and victim Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, shamelessly continuing to falsely represent Tavares’ Companies Defendants Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”) (collectively “Tavares’ Companies”), staying in the BRIDGELOAN Case to prevent justice and cover up the schemes by officers of the court upon the Miami Courts, after Tavares fires Lehman and LKLS+G, and files a Florida Bar Complaint, exchange [E-mails](#) to further the scheme. The Record¹⁹⁴ now shows that Tavares’ LKLS+G attorneys are **bought**, continuing fabricating sham Corporate Resolutions to hijack Tavares’ Companies, as they know, and the record shows, Tavares is the sole authority of Tavares’ Companies.

¹⁹³ Unknown to Tavares, Lehman and Rengstl at LKLS+G, at all relevant times, are criminals using their Florida Bar licenses as guise to commit crimes, together with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), against clients, and also are **bought** by Abreu Jr., conspiring, jointly and together, to cause a sham settlement (“Fraudulent Settlement”), predicated on false and invalid authority, purportedly from false, invalid, and fraudulent Power of Attorneys of Tavares’ Companies (“Sham POAs”), and upon being exposed with the Fraudulent Settlement, Tavares’ attorneys embark in a relentless campaign to con, coerce, intimidate, deprive and extort client Tavares not to oppose the Fraudulent Settlement, that the Perpetrators, fearing Tavares is about to sell one of Tavares’ two properties to pay off the sham \$12 million BRIDGELOAN/BNY Mellon loan, stage an unnoticed and sham **Trial** of April 8, 2011.

¹⁹⁴ Only after some limited discovery in one of the [Related Cases](#), at the end of 2013, that Tavares starts to comprehend the scope of the massive brazen frauds and extortion by Tavares’ attorneys, among others, Lehman, Rengstl, LKLS+G, and Larry A. Stumpf, Jared M. Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), together with opposing parties BRIDGELOAN and Romulo Pine Dantas (“Dantas”), MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon (“BNY Mellon”), and corrupt Judge Allan Lester Langer (“Judge Langer”), all implicated in the scheme depriving and extorting Tavares of two properties, valued over \$50 million dollars, and rights, defrauding BNY Mellon’s shareholders, and depriving the United States of America and the State of Florida of honest services upon a court of law in the United States of America.

COUNTS

Count 654 - 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 655 - 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 656 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 657 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 658 - Thomas Ralph Lehman ("Lehman") (trl@lkllaw.com), Patrick J. Rengstl ("Rengstl") (pjr@lkllaw.com), Carol A. Greco ("Carol Greco") (cg@lkllaw.com.com), Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Olten Ayres de Abreu Junior ("Abreu Jr.") (olten@fbot.ch), at FBT Avocats, Geneve, Switzerland ("FBT Avocats"), Matthew Paul Leto ("Leto") (MLeto@hlhlawfirm.com), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELOAN" Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Courts"), subverted by the Perpetrators to further the scheme, certain [E-mails](#) from June 10, through June 30, 2011 – to wit: **658(a) On June 10, 2011 at 7:15 a.m., From Lehman To Leto, cc Rengstl:** "Subject: *Bridgeloan – What result from the Brickell Village sale yesterday? Thomas R. Lehman*"; **658(b) On June 10, 2011 at 7:30 a.m., From Leto To Lehman, cc Rengstl:** "Subject: *Bridgeloan – Bridgeloan got it for a few thousand dollars Matthew P. Leto Hall Lamb and Hall P.A.*"; **658(c) On June 10, 2011 at 7:31 a.m., From Lehman To Leto, cc Rengstl:** "Subject: *Bridgeloan – Thanks Thomas R. Lehman*"; **658(d) On June 27, 2011 at 22:59 [4:59 p.m. EST], From Lehman To Abreu Jr., cc Carol Greco:** "Subject: *Miami River Park Marina Environmental Trustee Account – Olten*" – LEHMAN & LKLS+G have willfully erased the email contents to avoid self-incrimination when providing discovery in the Related Legal Malpractice and Fraud Suit by Tavares; **658(e) On June 27, 2011 at 5:00 p.m., From Lehman To Abreu Jr., cc Carol Greco:** "Subject: *FW: Miami River Park Marina Environmental Trustee Account*" – ERASED, *Id.*: **658(f) On June 27, 2011 at 5:01 p.m., From Lehman To Abreu Jr., cc Carol Greco:** "Subject: *FW: Miami River Park Marina Inc.* [after the successful extortion Tavares' properties, Lehman starts to

use Miami River Park Marina Inc.'s correct and legal name, as opposed to before, showing one of their **Omertà Codes**, see, e.g., Lehman, and the implicated officers of the court's sham pleadings in the BRIDGELoAN Case showing, while they are on the schemes, using "**Miami River Marina Park, Inc.**" and not the correct name Miami River Park Marina, Inc.] *Attachments: Statement-06-11.jpg*". – ERASED, *Id.*; **658(g) On June 27, 2011 at 5:27 p.m., From Abreu Jr. To Lehman, cc Carol Greco**: "*Subject: RE: Miami River Park Marina Environmental Trustee Account – Dear Tom,- ERASED, Id. – Olten*"; and **658(h) On June 30, 2011 at 7:30 p.m., From Lehman To Carol Greco**: "*Subject: FW: Miami River Park Marina Environmental Trustee Account*" – ERASED, *Id.* At all relevant times, Lehman, Rengstl, Carol Greco, LKLS+G, Abreu Jr., FBT Avocats S.A., Mathew Paul Leto, Hall Lamb and Hall, P.A., and other Perpetrators implicated, know that they are furthering schemes depriving and extorting U.S. citizen and victim Charles Tavares of properties and rights upon subverted proceedings, and that they are also depriving shareholders of The Bank of New York Mellon of honest services, and The United States of America and the State of Florida of, *inter alia*, honest services upon courts of law in the United States. To further the brazen schemes, the Perpetrators implicated herein, knowingly and intentionally, transmit E-mails, in violation of, Title 18, U.S.C., §1343.

Count 659 - At all times relevant, Thomas Ralph Lehman, Patrick J. Rengstl, Carol A. Greco, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Olten Ayres de Abreu Junior, FBT Avocats S.A., in Geneve Switzerland, ("FBT Avocats"), Matthew Paul Leto, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 660 - Thomas Ralph Lehman, Patrick J. Rengstl, Carol A. Greco, Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G"), Olten Ayres de Abreu Junior, FBT Avocats S.A., in Geneve Switzerland, ("FBT Avocats"), Matthew Paul Leto, Hall Lamb and Hall, P.A., 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares's Companies to fraudulently settle the BRIDGELoAN Case against client Tavares' orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE VIOLATIONS PERPETRATORS

661	July 6, 2011	<u>U. S. CODE TITLE 18</u>	Alan Samuel Fine Alan S. Fine, P.A. Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Mirna Almanza Ramon Anzola-Robles Anzola-Robles & Asociados Olten Ayres de Abreu Junior The Continued Criminal Enterprise
662		§ 371 Conspiracy to Defraud the USA &	
663		§ 241 Conspiracy Against Rights &	
664		§ 242 Deprivation Rights Under Color of Law &	
665		§ 1346 Scheme/Artifice to Defraud &	
666		§ 1341 Mail Fraud &	
667		§ 1343 Wire Fraud &	
668		§ 1961 <i>et seq.</i> – RICO & <u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On July 6, 2011, criminal [Alan Samuel Fine](#) (“Fine”), to further a scheme depriving and extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, [following orders](#) from Tavares’s former attorneys, [Thomas R. Lehman](#)¹⁹⁵ (“Lehman”), and [Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”), together with [fixer Olten Ayres de Abreu Junior](#) (“Abreu Jr.”), [transmits](#), Via U.S. Postal Mail and E-Mail, to further the scheme, a certain false, invalid and fraudulent “*Written Action of the Sole Shareholder of Miami River Park Marina, Inc.*”, falsely removing Tavares, following similar artifices to fraudulently hijack other of Tavares’ Companies, *inter alia*,¹⁹⁶ Brickell Village One, LLC, and 2147 SW 8 Street, LLC.

¹⁹⁵ Lehman and [Patrick J. Rengstl](#), at LKLS+G, at all relevant times, are criminals using their Florida Bar licenses as guise to commit crimes, together with Associates of Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), against clients, and also are **bought** by Abreu Jr., conspiring, jointly and together, to cause a sham settlement (“Fraudulent Settlement”), predicated on false and invalid authority purportedly from false, invalid, and fraudulent Power of Attorneys of Tavares’ Companies (“Sham POAs”), and upon being exposed with the Fraudulent Settlement, Tavares’ attorneys embark in a relentless campaign to con, coerce, intimidate, deprive and extort client Tavares not to oppose the Fraudulent Settlement, that the Perpetrators, fearing Tavares is about to sell one of Tavares’ two properties to pay off the sham \$12 million BRIDGELOAN/BNY Mellon loan, stage an unnoticed and sham **Trial** of April 8, 2011, and following the successful extortion of Tavares’s properties valued over \$50 million dollars, stay, shamelessly in an unauthorized fraudulent representation of Tavares’ Companies, after fired by Tavares, for sixteen (16) months, to prevent justice and cover up.

¹⁹⁶ Then, the Criminal Enterprise, despite [warnings](#), embarks on continuous hijackings of Tavares’ Companies, using some of the same Perpetrators implicated in the BRIDGELOAN Case, with same *Modus Operandi* – conspiring together and jointly with Associates in the Republic of Panama, fabricating totally sham and contradictory Corporate Resolutions to hijack Tavares’ Companies, and predicated on subverted Miami Courts, presided by the same implicated Judges, among others, corrupt Judges [Allen Lester Langer](#) (“Judge Langer”), and [Norma S. Lindsey](#) (“Judge Lindsey”), depriving and extorting the same victim U.S. Citizen Tavares, upon courts of law in the United States. *See, e.g.*, in the *Brickell Commerce Plaza, Inc., et al. v. Charles Tavares, Related Case* No. 2011-29624-CA-30, where Lehman’s apprentice, [Peter F. Valori](#) (“Valori”), [Marco E. Rojas](#) (“Rojas”), [Gabriela Machado Guimaraes](#), [Stewart L. Kasner](#) (“Kasner”), and Mossack Fonseca & Co., fabricate on July 28, 2011, sham “*Written Resolutions of Sole Shareholder of BCP*”, causing the successful extortion of Tavares’ Properties valued over \$15 million dollars.

COUNTS

Count 661 - 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 662 - 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 663 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 664 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 665 - Criminal Alan Samuel Fine, at Fine & Associates, P.A. (collectively "Fine"), at 255 Alhambra Circle, Suite 850, Coral Gables, Florida 33133, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, conning, coercing, intimidating, threatening, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELOAN" Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Court"), transmitting, Via U.S. Postal Mail, on July 6, 2011, a certain [sham Letter](#) and false, invalid and fraudulent Corporate Resolutions for Tavares' Company Miami River Park Marina, Inc. ("MRPM"), to falsely hijack Tavares' MRPM to, *inter alia*, cover up the successful scheme extorting \$50 million dollars of properties from Tavares' Companies, to wit - **665(a) From Fine To** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131: and **650(b) From Fine To** Larry A. Stumpf, at Black Srebnick Kornspan & Stumpf, P.A., at 201 S. Bayshore Dr., Suite 1300, Miami, FL 33133. To further the scheme, Fine transmits the sham Letter, via US Postal Mail, in violation of, Title 18, U.S.C., §1341.

Count 666 - Criminal Alan Samuel Fine, at Fine & Associates, P.A. (collectively "Fine") (AFine@fine-law.com) , at 255 Alhambra Circle, Suite 850, Coral Gables, Florida 33133, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, coercing, depriving, and extorting Charles Tavares ("Tavares") of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELOAN" Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#)

("Miami Courts"), subverted by the Perpetrators to further the scheme, a certain [E-mail](#) letter of July 6, 2011, containing statements, to further the scheme, that Fine knows is false and fraudulent, together with a sham Corporate Resolution for Tavares' Company Miami River Park Marina, Inc. ("MRPM"), to cover up the frauds successfully depriving and extorting Tavares of over \$50 million dollars, in two separate properties, to wit: **666(a) On July 6, 2011, From Fine to Tavares (ctavares@bellsouth.net), see Letter of July 6, 2011; and 666(b) On July 6, 2011, From Fine to Larry Allen Stumpf at Black Srebnick Kornspan & Stumpf, P.A. (LStumpf@royblack.com), see Letter of July 6, 2011.** At all relevant times, Fine, and other Perpetrators implicated, know that they are furthering schemes depriving and extorting U.S. citizen and victim Charles Tavares of properties and rights upon subverted proceedings, and that they are also depriving shareholders of The Bank of New York Mellon of honest services, and The United States of America and the State of Florida of, *inter alia*, honest services upon courts of law in the United States. To further the brazen schemes, the Perpetrators implicated herein, knowingly and intentionally, transmits the sham E-mails, in violation of, Title 18, U.S.C., §1343.

Count 667 - At all times relevant, Alan Samuel Fine, Fine & Associates, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Olten Ayres de Abreu Junior, FBT Avocats, S.A., Ramon Anzola-Robles, Mirna Almanza, Anzola-Robles & Asociados, 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 668 - Alan Samuel Fine, Fine & Associates, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Olten Ayres de Abreu Junior, FBT Avocats, S.A., Ramon Anzola-Robles, Mirna Almanza, Anzola-Robles & Asociados, 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares's Companies to fraudulently settle the BRIDGELOAN Case against client Tavares' orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

669	August 5, 2011	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Joseph Horn Ralph Horn Ricardo Eichenwald Fernando Braghin Daniel Ades The Continued Criminal Enterprise
670		§ 241 Conspiracy Against Rights &	
671		§ 242 Deprivation Rights Under Color of Law &	
672		§ 1346 Scheme/Artifice to Defraud &	
673		§ 1341 Mail Fraud &	
674		§ 1343 Electronic Wire Fraud &	
675		§ 1961 <i>et seq.</i> – RICO &	
676		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On August 5, 2011, shameless and reckless attorneys Matthew Paul Leto (“Leto”), and Andrew Clifford Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, [file](#), with unclean hands, after Tavares starts to uncover and expose the scheme, a sham Motion to Direct the Clerk to Issue Certificate of Title (“**Motion Directing Clerk to Issue Title**”). At all relevant times, Leto, Andy Hall, and Bridgeloan Investors, Inc.’s¹⁹⁷ (“BRIDGELOAN”) principals, Joseph Horn (“Horn”), Ralph Horn (“Ralph”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), and Daniel Ades (“Ades”), know that, *inter alia*, they have subverted the Miami Courts to cause false, invalid, and fraudulent Final Judgements predicated on sham pleadings, fraudulent Sworn Affidavits of Horn, and on an invalid and fraudulent settlement further predicated on false, invalid and fraudulent Power of Attorneys (“Sham POAs”) of Tavares’ Companies’ Defendants, secretly fabricated, and used, by Tavares’ corrupt attorneys Thomas R. Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), Levine Kellogg Lehman Schneider +Grossman, LLP (“LKLS+G”), Larry Allen Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick” or “BSK&S”), together with BRIDGELOAN and Third Party Defendant Romulo Pina Dantas (“Dantas”). Leto, Hall & Lamb, and BRIDGELOAN, knowingly and intentionally, to further the scheme, falsely states that, *e.g.*, “*On the day of trial [April 8, 2011], the parties announced on the record that they reached an agreement...*”, when in truth and in fact, the shameless Perpetrators all know in truth and in fact, that, there was never a “*trial*,” as they simply staged a sham unnoticed proceeding, improperly presided by corrupt Judge Allen Lester Langer, to falsely legalize the invalid and fraudulent settlement predicated on the Sham POAs’, that they all know is false, invalid, and fraudulent.

¹⁹⁷ BRIDGELOAN is an entity used by Horn’s Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors.

COUNTS

Count 669 - 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 670 - 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 671 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 672 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 673 - Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A. (collectively “Hall & Lamb”), at 2665 South Bayshore Drive, Penthouse 1, Miami, Florida 33133, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Court”), [transmitting](#), Via U.S. Postal Mail, on August 5, 2011, a certain Sham Motion Directing the Clerk to Issue Tittle, knowingly and intentionally, to cover up the successful scheme extorting \$50 million dollars of properties from Tavares' Companies, falsely stating that: “*“On the day of trial [April 8, 2011], the parties announced on the record that they reached an agreement...”*”, to wit - **673(a) From** Hall & Lamb **To** Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **673(b) From** Hall & Lamb **To** Erica English, Esq., Katz Barron Faust Squitero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; **673(c) From** Hall & Lamb **To** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and Via Certified Mail **673(d) From** Hall & Lamb **To** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131, to further the schemes, in violation of, Title 18, U.S.C., §1341.

Count 674 - Matthew Paul Leto (MLeto@hlhlawfirm.com), Andrew Clifford Hall, Hall Lamb and Hall, P.A. (collectively "Hall & Lamb"), at 2665 South Bayshore Drive, Penthouse 1, Miami, Florida 33133, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Court"), [transmitting](#), Via Electronic Facsimile, on August 5, 2011, a certain Sham Motion Directing the Clerk to Issue Tittle, knowingly and intentionally, to cover up the successful scheme extorting \$50 million dollars of properties from Tavares' Companies, falsely stating that: " *On the day of trial [April 8, 2011], the parties announced on the record that they reached an agreement...*", to wit - **674(a) From** Hall & Lamb **To** Thomas R. Lehman, Esq., (trl@lklaw.com), Levine Kellogg Lehman Schneider + Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **674(b) From** Hall & Lamb **To** Erica English, Esq. (ELE@katzbarron.com), Katz Barron Faust Squitero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; and **674(c) From** Hall & Lamb **To** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134, to further the schemes, in violation of, Title 18, U.S.C., §1343.

Count 675 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 676 - Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further the brazen scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

677	August 10, 2011	<u>U. S. CODE TITLE 18</u>	Alan Samuel Fine Alan S. Fine, P.A. Romulo Pina Dantas Olten Ayres de Abreu Junior The Continued Criminal Enterprise
678		§ 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights &	
679		§ 242 Deprivation Rights Under Color of Law &	
680		§ 1346 Scheme/Artifice to Defraud &	
681		§ 1341 Mail Fraud &	
682		§ 1961 <i>et seq.</i> – RICO &	
683		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On August 10, 2011, criminal [Alan S. Fine](#) (“Fine”), to further a scheme depriving and extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, files, with unclean hands, a [Sham Special Appearance and Motion to Dismiss Amended Third-Party Complaint](#) (“**Fine’s Sham Special Appearance**”) in the BRIDGELoAN Case, purportedly representing¹⁹⁸ Third Party Defendant Romulo Pina Dantas (“Dantas”). Fine, to further the scheme, transmits, Via U.S. Postal Mail, Fine’s Sham Special Appearance. At all relevant times, Fine knows that he is conspiring, jointly and together with BRIDGELoAN’s CCE, and Associates Lehman, Marco E. Rojas (“Rojas”), and Dantas’ fixer and money bag man, attorney Olten Ayres de Abreu Junior (“Abreu Jr.”), to systematically and repeatedly, coerce, threaten, intimidate, deprive, and extort U.S. Charles Tavares (“Tavares”) of properties and rights, upon a court of law in the United States of America, subverted by BRIDGELoAN’s CCE and its Associates, further depriving BNY Mellon’s shareholders, the State of Florida, and the United States of America of honest services.

¹⁹⁸ Fine, is a criminal, and longtime Associate of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), using his Florida Bar license as guise to deprive and extort, *inter alia*, clients, the State of Florida, and the United States of America. Fine, since July 2010, is covertly, and falsely representing Dantas as part of sham lender BRIDGELoAN’s scheme to deprive and extort, together with Tavares’ corrupt and **bought** personal and corporate attorneys [Thomas Ralph Lehman](#) (“Lehman”), [Patrick J. Rengstl](#) (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Tavares of two (02) separate properties valued over \$50 million dollars, in lieu of a sham \$12 million dollars loan by BRIDGELoAN and associate [The Bank of New York Mellon Corporation](#) a.k.a. MUN Loan Holdings, LLC (“BNY Mellon”) (collectively “Sham Lenders”), intentionally and knowingly, caused into default by the Sham Lenders. And, Fine, since [April 7, 2011](#), after CCE’s Associate Lehman orders Fine to fix the corporate issues of Tavares’ Companies Defedannts Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”), Fine, shamelessly, fabricates, together with bad actors in the Republic of Panama, totally erroneous, false, invalid and fraudulent Corporate Resolutions of Tavares’ Companies to hijack Tavares’ Companies. After Fine makes Fine’s Sham Special Appearance to further the scheme, Fine is nominated, along with other bad actors implicated, *e.g.*, [Joseph I. Davis Jr.](#), [Norma Shepard Lindsey](#), by, then Governor [Rick Scott](#) (“Rick Scott”), to be a Circuit Judge upon Miami Courts, the same court that Fine, *et al.*, systematically defrauded, showing the CCE’s powers, and corruptive moneys in the Cayman Islands, for all to see, and not dare to stand up to.

COUNTS

Count 677 - 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 678 - 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 679 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 680 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 681 - Alan Samuel Fine, Alan S. Fine, P.A. (collectively "Fine"), at 255 Alhambra Circle, Suite 850, Coral Gables, Florida 33134, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Court"), U.S. Posta Mail, transmitting, on August 10, 2011, a certain [Fine' Sham Special Appearance](#) in the sham BRIDGELoAN Case, to wit - **681(a) From Fine To** Levine Kellogg Lehman Schneider + Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **681(b) From Fine To** Erica L. English, Esquire, Katz Barron Faust Squitero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; **681(c) From Fine To** Matthew P. Leto, Esquire, Hall, Lamb, and Hall, P.A. at 2665 South Bayshore Drive, Penthouse 1, Miami, FL 33133; **681(d) From Fine To** Jorge L. Fors, Esquire, Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and **681(e) From Fine To** Charles Tavares Pro Se, at 444 Brickell Avenue, Suite 720, Miami, FL 33131, to further the schemes, in violation of, Title 18, U.S.C., §1341.

Count 682 - At all times relevant, Alan Samuel Fine, Fine & Associates, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Romulo Pina Dantas, Olten Ayres de Abreu Junior, FBT Avocats, S.A., Ramon Anzola-Robles, Mirna Almanza, Anzola-Robles & Asociados, 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 683 - Alan Samuel Fine, Fine & Associates, P.A., Thomas Ralph Lehman, Patrick J. Rengstl, Levine Kellogg Lehman Schneider + Grossman, LLP, Romulo Pina Dantas, Olten Ayres de Abreu Junior, FBT Avocats, S.A., Ramon Anzola-Robles, Mirna Almanza, Anzola-Robles & Asociados, 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares's Companies to fraudulently settle the BRIDGELoAN Case against client Tavares' orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

684	September 15, 2011	<u>U. S. CODE TITLE 18</u>	Gabriela Machado Guimaraes
		§ 371 Conspiracy to Defraud the USA	Joao Evangelista da Costa Tenorio
685		&	Maria Fernanda Brandao Vilela
		§ 241 Conspiracy Against Rights	Stewart L. Kasner
686		&	Mossack Fonseca & Co.
		§ 242 Deprivation Rights Under Color of Law	Peter Francis Valori
687		&	Russell Marc Landy
		§ 1346 Scheme/Artifice to Defraud	Damian & Valori, LLP
688		&	Marco Emilio Rojas
	§ 1343 Wire Fraud	R&S International Law Group	
689	&	Allan Lester Langer	
	§ 1961 <i>et seq.</i> – RICO	Norma Shepard Lindsey	
690		&	Miami Courts
		<u>FLORIDA STATUTES</u>	Third District Court of Appeal FL
		Title XLVI § 817.155 Fraudulent Practices	Supreme Court of Florida
			The Continued Criminal Enterprise

On September 15, 2011, Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), to continue depriving and extorting U.S. citizen and victim Charles Tavares (“Tavares”) of all properties and rights, upon subverted courts in the United States of America, deploy, concurrently, their third Sham [Related Case](#) against Tavares. The CCE follows the same *Modus Operandi*,¹⁹⁹ using Associates²⁰⁰ using their Florida Bar licenses as guise to commit crimes to further the affairs of the CCE against U.S. citizens, the State of Florida, and the United States of America. Because they know, at all relevant times, that they have systematically corrupted and subverted the judicial and political machinery in Florida, the CCE’s Associates know they are **untouchables**, and are not afraid of the law, or responsible law enforcement agencies, as the rule of law does not apply to the CCE. BRIDGELOAN’s CCE is a long running Criminal Enterprise, starting in the United States of America *circa* 1990, and evolving into a powerful Global Continued Criminal Enterprise,²⁰¹ using its Associations in Brazil, and elsewhere to spread its corruptive and subversive powers undermining rule of law and democracy wherever it chooses to freely operate, causing long lasting damages to communities.

¹⁹⁹ The CCE causes Associates in Miami, FL, and in the Republic of Panama, to fabricate contradictory, false, invalid, & fraudulent Corporate Resolutions of Tavares’ Companies Brickell Commerce Plaza, Inc., a Florida corp., and The Car Wash Concept, Inc., a Florida corp. (collectively “Tavares’ Companies”), to falsely hijack Tavares’ Companies, in order to file a Sham Suit in the subverted Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), that the CCE causes to be presided by its corrupt Judges, assuring the easy and successful deprivation of Tavares’ properties and rights, under color of law, in a continuous, and ongoing, barrage of sham suits to deprive, extort, destroy, and silence Tavares from fighting back.

²⁰⁰ Among other Associates, Marco E. Rojas (“Rojas”), Peter Francis Valori (“Valori”) – an apprentice of Associate Thomas R. Lehman (“Lehman”), reckless attorney Stewart L. Kasner (“Kasner”), and [Mossack Fonseca & Co.](#), in the Republic of Panama.

²⁰¹ The record shows that Horn’s CCE has teamed up in the United States of America, with Brazil’s largest builders, *inter alia*, Horn’s family’s [Cyrela Brazil Realty S.A.](#) (“CYRELA”) (Stock [OTCMKTS](#): CYRBY), [MRV Engenharia S.A.](#) a.k.a. AHS Residential, LLC a.k.a. [RESIA, LLC](#) (“collectively “RESIA”), and offshoots of [ODEBRECHT Construction](#), developing a Global powerhouse of purveyors of tax frauds, bank/mortgage/securities/tax-free bond frauds, corruption, subversion, and extortion, in a covertly, sophisticated, and monumental scale, now threatening national institutions, rule of law, and democracy. On September 8, 2011, Horn’s son, [Alex Horn](#) (“Alex Horn”), to further the CCE, founds [BRIDGEINVEST, LLC, a Florida L.L.C.](#) (Tax Id. #45-3188071),

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](#).

* 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.

COUNTS

Count 684 - 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 685 - 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 686 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 687 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 688 - BRIDGELoAN'S Associates, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the [Related Cases](#) upon the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Court"), U.S. Posta Mail, transmitting, hundreds of false, invalid, and fraudulent documents to further schemes depriving and extorting, among others, U.S. citizen Charles Tavares of properties and rights, 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., §1341.

Count 689 - At all times relevant, BRIDGELoAN's Associates, 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 690 - BRIDGELOAN's Associates, 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares's Companies to fraudulently settle the BRIDGELOAN Case against client Tavares' orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

691	November 11, 2011 at 4:01 PM	<u>U. S. CODE TITLE 18</u>	Matthew Paul Leto
692		§ 371 Conspiracy to Defraud the USA	Andrew Clifford Hall
693		&	Hall Lamb and Hall, P.A.
694		§ 241 Conspiracy Against Rights	Joseph Horn
695		&	Ralph Horn
696		§ 242 Deprivation Rights Under Color of Law	Ricardo Eichenwald
		&	Fernando Braghin
		§ 1346 Scheme/Artifice to Defraud	Daniel Ades
		&	Nelson Slosbergas
		§ 1961 <i>et seq.</i> – RICO	Priscila Volpato
		&	Avi Cohen
		<u>FLORIDA STATUTES</u>	Bridgeloan Investors, Inc.
		Title XLVI § 817.155 Fraudulent Practices	Bridgeriv Management LLC
			BANIF Securities, Inc
			BRIXRIV, LLC
			RIVBRIX, LLC
			The Continued Criminal Enterprise

On August 11, 2011, shameless attorneys Matthew Paul Leto (“Leto”), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, [file](#), with unclean hands, a Notice of Filing Bridgeloan Investors, Inc.’s²⁰² (“BRIDGELOAN”) Assignment of Judgement (“**Sham Assignment**”) dated November 27, 2011, for Tavares’ Properties owned by Tavares’ Companies Brickell Village One, LLC, a Florida L.L.C. (“BV One”), 2147 SW 8 Street, LLC, a Florida L.L.C. (“2147”), and Miami River Park Marina, Inc., a Florida corporation (“MRPM”), invalidly and fraudulently obtained by BRIDGELOAN in an unnoticed sham trial of April 8, 2011, predicated on a false, invalid, and fraudulent settlement predicated on secretly fabricated Power of Attorneys for Tavares’ Companies. The Sham Assignment,²⁰³ executed by BRIDGELOAN’s principal Horn, witnessed by BRIDGELOAN’s employees Priscila Volpato (“Volpato”), and Avi Cohen (“Avi Cohen”), and notarized²⁰⁴ by Mayra Moses (“Mayra Moses”) shows BRIDGELOAN assigning interests on Tavares’ Properties to BRIXRIV, LLC, a Florida L.L.C. (“BRIXRIV”) (Tax Id.# None), and to RIVBRIX, LLC, a Florida L.L.C. (“RIVBRIX”) (Tax Id.# None). BRIXRIV and RIVBRIX are entities created by BRIDGELOAN and BANIF to further continued racketeering schemes. Reckless attorney Leto do not file the service notice.

²⁰² BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

²⁰³ The Sham Assignment (Leto’s Doc. #9881\00236528.1) is another artifice of BRIDGELOAN’s CCE to cover up the schemes, money launder the ill-gotten proceeds, and tax defraud the United States of America.

²⁰⁴ Notary Public Maya Moses does not date the day Horn’s signature is acknowledged on the Assignment of Judgment.

COUNTS

Count 691 - 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 692 - 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 693 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 694 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 695 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 696 – Matthew Paul Leto 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further the brazen scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

697	November 11, 2011 at 4:01 PM	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A.
698		§ 241 Conspiracy Against Rights &	Joseph Horn Ralph Horn
699		§ 242 Deprivation Rights Under Color of Law &	Ricardo Eichenwald Fernando Braghin
700		§ 1346 Scheme/Artifice to Defraud &	Daniel Ades Nelson Slosbergas
701		§ 1341 Mail Fraud &	Bridgeloan Investors, Inc. Bridgeriv Management LLC
702		§ 1961 <i>et seq.</i> – RICO &	BANIF Securities, Inc BRIXRIV, LLC
703		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	RIVBRIX, LLC The Continued Criminal Enterprise

On August 11, 2011, shameless attorneys Matthew Paul Leto (“Leto”), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, [file](#), with unclean hands, on behalf of Bridgeloan Investors, Inc.²⁰⁵ (“BRIDGELOAN”), a Sham Motion to Direct the Clerk to Issue Certificate of Title (“**Sham Motion Direct Clerk Issue Title**”) for Tavares’ Properties owned by Tavares’ Companies Brickell Village One, LLC, a Florida L.L.C. (“BV One”), 2147 SW 8 Street, LLC, a Florida L.L.C. (“2147”), and Miami River Park Marina, Inc., a Florida corporation (“MRPM”), invalidly and fraudulently obtained by BRIDGELOAN in an unnoticed sham trial of April 8, 2011, predicated on a false, invalid, and fraudulent settlement, further predicated on secretly fabricated Power of Attorneys for Tavares’ Companies. The Sham Motion Direct Clerk Issue Title to BRIXRIV, LLC, a Florida L.L.C. (“BRIXRIV”) (Tax Id.# None), and to RIVBRIX, LLC, a Florida L.L.C. (“RIVBRIX”) (Tax Id.# None) is another artifice of BRIDGELOAN’s Criminal Enterprise to cover up the schemes extorting Tavares of properties and rights, under color of law, and further tax defraud the United States of America by using BRIXRIV and RIVBRIX, entities created by BRIDGELOAN and BANIF to unduly avoid taxes. As part of the scheme, reckless BRIDGELOAN’s attorney Leto files the Sham Final Judgment of Foreclosure, falsely stating to defraud the Court, among other things, that **“THIS Action [BRIDGELOAN Case] was tried before the Court on April 8, 2011 on notice to all parties,”** see Final Judgment of Foreclosure Page 1 at ¶ 1., when in truth and in fact, Leto, *et al.*, know that there was never a trial on April 8, 2011, or ever. *See also* Leto’s Sham Late Notice of Hearing of April 8, 2011, filed hours after Leto, *et al.*, fraudulently stage the Sham unnoticed Trial of April 8, 2011.

²⁰⁵ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

COUNTS

Count 697 - 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 698 - 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 699 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 700 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 701 – Matthew Leto, Andrew Hall, Hall Lamb and Hall, P.A. (collectively “Hall & Lamb”), at 2665 South Bayshore Drive, Penthouse 1, Miami, FL 33133, and other Perpetrators implicated, did knowingly and intentionally use as an artifice to further a criminal scheme, depriving and extorting Charles Tavares (“Tavares”) of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Court”), transmitting, Via U.S. Postal Mail, on November 29, 2011, a certain Sham Motion Directing the Clerk to Issue Certificate of Tittle (Leto’s Doc. #9881\00221518.1), knowingly and intentionally, to cover up the scheme extorting \$50 million dollars of properties from Tavares’ Companies, falsely states that: **“On the day of trial [April 8, 2011], the parties announced on the record that they reached an agreement...”**, to wit - **701(a) From** Hall & Lamb **To:** Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”)²⁰⁶, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **701(b) From** Hall & Lamb **To:** Erica English, Esq., Katz Barron Faust Squitiero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; **701(c) From** Hall & Lamb **To:** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and Via Certified Mail **701(d) From** Hall & Lamb **To:** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131, to further the schemes, in violation of, Title 18, U.S.C., §1341.

²⁰⁶ Reckless attorneys LKLS+G, criminals using their Florida Bar licenses as guise to perpetrate frauds and extortion against former client Tavares and Tavares’ Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc., willfully stay in an unauthorized and fraudulent representation, after being fired, to prevent justice and cover up schemes.

Count 702 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 703 - Matthew Paul Leto 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further the brazen scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

704	November 11, 2011 at 4:01 PM	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A.
705		§ 241 Conspiracy Against Rights &	Joseph Horn Ralph Horn
706		§ 242 Deprivation Rights Under Color of Law &	Ricardo Eichenwald Fernando Braghin
707		§ 1346 Scheme/Artifice to Defraud &	Daniel Ades Nelson Slosbergas
708		1341 Mail Fraud &	Bridgeloan Investors, Inc. Bridgeriv Management LLC
709		§ 1343 Wire Fraud &	BANIF Securities, Inc BRIXRIV, LLC
710		§ 1961 <i>et seq.</i> – RICO &	RIVBRIX, LLC The Continued Criminal Enterprise
711		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On August 11, 2011, shameless attorneys Matthew Leto (“Leto”), and Andrew Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to further a criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, [file](#), with unclean hands, on behalf of Bridgeloan Investors, Inc.²⁰⁷ (“BRIDGELOAN”), a [Sham Notice of Hearing for December 1, 2011 at 10:30 a.m.](#) (“**Sham Notice**”), on BRIDGELOAN’s Sham Motion to Direct the Clerk to Issue Certificate of for Tavares’ Properties owned by Tavares’ Companies Brickell Village One, LLC, a Florida L.L.C. (“BV One”), 2147 SW 8 Street, LLC, a Florida L.L.C. (“2147”), and Miami River Park Marina, Inc., a Florida corporation (“MRPM”), invalidly and fraudulently obtained by BRIDGELOAN in an unnoticed sham trial of April 8, 2011, predicated on a false, invalid, and fraudulent settlement predicated on secretly fabricated Power of Attorneys for Tavares’ Companies. The Sham Motion Direct Clerk Issue Title to BRIXRIV, LLC, a Florida L.L.C. (“BRIXRIV”) (Tax Id.# None), and to RIVBRIX, LLC, a Florida L.L.C. (“RIVBRIX”) (Tax Id.# None) is another artifice of BRIDGELOAN’s CCE to cover up the schemes extorting Tavares of properties and rights, under color of law, and further tax defraud the United States of America by using BRIXRIV and RIVBRIX, entities created by BRIDGELOAN and BANIF to unduly avoid taxes. The Clerk of the Courts duly rejects the Sham Notice of Hearing as “**Not Timely**”, showing the Sham Notice of Hearing improperly scheduling a Sham Hearing a couple days after the Sham filing. Shameless Leto and other perpetrators implicated know no boundaries, as they systematically and continuously use their Florida Bar licenses as guise to subvert the judicial machinery to further deprive and extort Tavares of rights and properties, under color of law.

²⁰⁷ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

COUNTS

Count 704 - 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 705 - 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 706 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 707 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 708 – Matthew P. Leto, Andrew C. Hall, Hall Lamb and Hall, P.A. (collectively “Hall & Lamb”), at 2665 South Bayshore Drive, Penthouse 1, Miami, Florida 33133, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Court”), transmitting, Via U.S. Postal Mail, on November 29, 2011, a certain [Sham Notice of Hearing](#) on Motion to Issue Certificate of Tittle (Leto’s Doc. #9881\00221518.1], knowingly and intentionally, to cover up the successful scheme extorting \$50 million dollars of properties from Tavares’ Companies, falsely stating that: “**On the day of trial [April 8, 2011], the parties announced on the record that they reached an agreement...**”, to wit - **708(a) From Hall & Lamb To:** Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”)²⁰⁸, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **708(b) From Hall & Lamb To:** Erica English, Esq., Katz Barron Faust Squitero, 2699 South Bayshore Drive, 7th Floor, Miami, FL 33133; **708(c) From Hall & Lamb To:** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and Via Certified Mail **708(d) From Hall & Lamb To:** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131, to further the schemes, in violation of, Title 18, U.S.C., §1341.

²⁰⁸ Reckless attorneys LKLS+G, criminals using their Florida Bar licenses as guise to perpetrate frauds and extortion against former client Tavares and Tavares’ Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc., willfully stay in an unauthorized and fraudulent representation, after being fired, to prevent justice and cover up schemes.

Count 709 – Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A. (collectively “Hall & Lamb”), at 2665 South Bayshore Drive, Penthouse 1, Miami, Florida 33133, Facsimile number 305-374-5033, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, upon subverted proceedings upon Miami Courts, electronic communications, to wit – among others, a certain Facsimile transmission of November 29, 2011, from Matthew P. Leto at Hall & Lamb, to wit: **709(a) From** Hall & Lamb **To** Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **709(b) From** Hall & Lamb **To** Erica English, Esq., Katz Barron Faust Squitero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; **709(c) From** Hall & Lamb **To** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and Via Certified Mail **709(d) From** Hall & Lamb **To** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131, to further the schemes, in violation of, Title 18, U.S.C., §1343.

Count 710 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 711 - Matthew Paul Leto 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further the brazen scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

712	December 1, 2011	<u>U. S. CODE TITLE 18</u>	Allan Lester Langer Miami Courts Mathew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. Thomas Ralph Lehman Patrick J. Rengstl LKLS+G, LLP Erica Lee English Harold Eugene Lindsey III Katz Barron Faust Squitero The Bank of New York Mellon Jorge L. Fors Jorge L. Fors, P.A. The Continued Criminal Enterprise
713		§ 371 Conspiracy to Defraud the USA &	
714		§ 241 Conspiracy Against Rights &	
715		§ 242 Deprivation Rights Under Color of Law &	
716		§ 1346 Scheme/Artifice to Defraud &	
717		§ 1344 Bank Fraud &	
718		§ 1961 <i>et seq.</i> – RICO &	
719		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>FLORIDA CODE OF JUDICIAL CONDUCT</u> Violations of Canons 1, 2, and 3	

On December 1, 2011, reckless Judge Allan Lester Langer (“Judge Langer”), continuing to knowingly and intentionally perpetrating crimes, under color of law, to further a scheme depriving and extorting U.S. citizen and victim Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), enters,²⁰⁹ with unclean hands, a [sham Order on a Motion to Direct Clerk to Issue Certificate of Title](#) (“**Sham Order to Issue Title**”) to BRIXRIV, LLC, a Florida L.L.C. (“BRIXRIV”) (Tax Id. #None), and BRIXRIV, LLC, a Florida L.L.C. (“RIVBRIX”) (Tax Id. #None) (collectively “BRIDGELoAN & BANIF”)²¹⁰. At all relevant times, the Perpetrators all know – and had to know, in truth and in fact, that the sham proceedings is an artifice to continue to systematically deprive and extort Tavares of properties and rights, and covering up the brazen scheme to prevent justice.²¹¹

²⁰⁹ Reckless Judge Langer, systematically and repeatedly violating the law and rights to further the scheme, enters the Sham Order to Issue Title in another invalid and fraudulent hearing, [falsely and invalidly set on November 29, 2011](#) by reckless attorney Matthew P. Leto (“Leto”) to further the scheme, that had been duly rejected by the Clerk of the Courts.

²¹⁰ Previously, on August 26, 2011, the Clerk had issued Certificate of Sale of Tavares’ Properties to BRIDGELoAN, and because Tavares exposes the frauds and extortion of BRIDGELoAN’s CCE, the Perpetrators, to cover up, money launder, and tax defraud, devise the artifice to trick the Clerk of the Courts to reissue title in name of BRIXRIV & RIVBRIX in a sham proceeding.

²¹¹ The Perpetrators know that the invalid Sham Order to issue Title is predicated on an invalid Notice of Hearing, and is an artifice to deprive and extort Tavares of properties and rights, depriving the United States of America of honest services upon courts of law in the United States, and continuously using The Bank of New York Mellon (“BNY Mellon”) as a tool to perpetrate crimes, depriving BNY Mellon’s Shareholders. The Record shows, and the Miami Courts, and all Perpetrators implicated further know that Tavares’ former reckless attorneys Thomas R. Lehman (“Lehman”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”) continue to falsely, invalidly and fraudulently representing Tavares’ Companies Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC and Miami River Park Marina, Inc. to prevent justice and cover up the brazen schemes, after being exposed and fired by client Tavares since April 2011, and after a Florida Bar Complaint for frauds and malpractice.

COUNTS

Count 712 - 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 713 - 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 714 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 715 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 716 - Shameless corrupt Judge Allan Lester Langer (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to further an underlying scheme, under color of law, defrauding, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. (“BNY Mellon”) (NYSE: BK), by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enabling and facilitating the deprivation and extortion of borrower and U.S. citizen Charles Tavares (“Tavares”) of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares’s Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, further showing BNY Mellon and its agents and representatives repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon’s Shareholders, in violation of, 18 U.S.C. §1344.

Count 717 - At all times relevant, shameless corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), 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, 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 718 - Shameless corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares’s Companies to fraudulently settle the BRIDGELoAN Case against client Tavares’ orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 719 – Shameless corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

720	December 5, 2011	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Clerk of the Miami Courts Miami Courts Allan Lester Langer
721		§ 241 Conspiracy Against Rights &	Mathew Paul Leto Andrew Clifford Hall
722		§ 242 Deprivation Rights Under Color of Law &	Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc.
723		§ 1346 Scheme/Artifice to Defraud &	Thomas Ralph Lehman Patrick J. Rengstl
724		§ 1344 Bank Fraud &	LKLS+G, LLP Erica Lee English
725		§ 1961 <i>et seq.</i> – RICO &	Harold Eugene Lindsey III Katz Barron Faust Squitero
726		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	The Bank of New York Mellon Jorge L. Fors Jorge L. Fors, P.A. The Continued Criminal Enterprise

On December 5, 2011, the Clerk of the Courts in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), in reckless disregard for, *inter alia*, the record displayed showing a brazen scheme in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), and Defendant’s Charles Tavares’ (“Tavares”) pleadings showing a scheme systematically and continuously depriving and extorting Tavares and Tavares’ Companies Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”) (“Tavares’ Companies”) of properties and rights, under color of law, issues²¹² a sham [Certificate of Title](#) (“**Sham Title MRPM**”) for Tavares’ 9 Acres MRPM Property (the “Miami River Marina”), see Miami Courts Record CFN #2011R0823883, and an [Amended Certificate of Title](#) (“**Sham Amended Title BV One & 2147**”) to BRIXRIV, LLC (“BRIXRIV”), and for Tavares’ BV One & 2147 Brickell Properties (“Brickell Buildings”) to RIVBRIX, LLC (“RIVBRIX”), see Miami Courts Record CFN #2011R0823816. Both, the Sham Title MRPM and Sham Amended Title BV One & 2147 are invalid and fraudulent, inasmuch as they are predicated on a false, invalid and fraudulent Order on Motion to Direct Clerk to Issue Certificate of Title of December 1, 2011, and further predicated on a sham staged and invalid *Trial* of April 8, 2011, used by the Perpetrators to enter a sham Final Judgment predicated on a sham settlement predicated on invalid, and fraudulent Power of Attorneys of Tavares’ Companies Defendants fabricated by Tavares’ attorneys Levine Kellogg Lehman Schneider + Grossman, LLP (LKLS+G)²¹³ and opposing parties. See Record.

²¹² Previously, on August 26, 2011, the Clerk of the Courts had already issued a [Certificate of Sale](#) for Tavares’ BV One & 2147 Properties to BRIDGELoAN, see Miami Courts Record CFN #2011R0587029, and because Tavares starts to expose the frauds and extortion of BRIDGELoAN’s CCE, the Perpetrators, to cover up, money launder, and tax defraud, devise the artifice to trick the Clerk of the Courts to reissue title in name of BRIXRIV and RIVBRIX in a sham and invalid proceeding of December 1, 2011.

²¹³ The Record shows Tavares’ former attorneys LKLS+G, fired by Tavares since April 2011, in a continuous unauthorized and fraudulent representation of Tavares’ Companies, to willfully prevent justice and cover up the brazen schemes upon the Court.

COUNTS

Count 720 - 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 721 - 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 722 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 723 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 724 - The Clerk of the Courts, shameless corrupt Judge Allan Lester Langer (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to further an underlying scheme, under color of law, defrauding, among others, Mellon United National Bank, N.B.A. n.k.a. The Bank of New York Mellon N.A. ("BNY Mellon") (NYSE: BK), by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enabling and facilitating the deprivation and extortion of borrower and U.S. citizen Charles Tavares ("Tavares") of properties and rights stemming from sham loans totaling \$12 million to Tavares personally, and Tavares's Companies Miami River Park Marina, Inc., Brickell Village One, LLC, a Florida L.L.C., and 2147 S.W. 8 Street, LLC, a Florida L.L.C., by sham lender Bridgeloan Investors, Inc., a Florida corp. and BNY Mellon, further showing BNY Mellon and its agents and representatives repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and BNY Mellon's Shareholders, in violation of, 18 U.S.C. §1344.

Count 725 - At all times relevant, The Clerk of the Courts, shameless corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), 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, 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 726 - Shameless corrupt Judge Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent Power of Attorneys of client Tavares’s Companies to fraudulently settle the BRIDGELoAN Case against client Tavares’ orders not to settle, intimidating, coercing, and extorting client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
727	February 13, 2012	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Joseph Horn Ralph Horn
728		§ 241 Conspiracy Against Rights &	Ricardo Eichenwald Fernando Braghin
729		§ 242 Deprivation Rights Under Color of Law &	Daniel Ades Nelson Slosbergas
730		§ 1346 Scheme/Artifice to Defraud &	Geania A. Fraga Bridgeloan Investors, Inc.
731		§ 1343 Wire Fraud &	Hugo Barreto Del Priore Marco Antonio de Souza
732		§ 1951 Extortion (Hobbs Act) &	BANIF Gabriela Machado Guimaraes
733		§ 1961 <i>et seq.</i> – RICO &	Maritza C. Calix Dunia Irene Pacheco
734		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	Peter Francis Valori Russell Marc Landy Damian & Valori, LLP Joseph I. Davis Jr. Miami Courts The Continued Criminal Enterprise

On February 13, 2012, as part of a scheme to falsely incriminate, outspend, and silence U.S. victim Charles Tavares (“Tavares”) in the underlying scheme²¹⁴, Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise²¹⁵ (“CCE” or “Criminal Enterprise”), causes another sham strategic lawsuit (“SLAPP”) against Tavares. The Perpetrators use Manager & Agent Geania Alves Fraga (“Fraga”), supported by false witnesses Maritza C. Calix (“Calix”), Dunia Irene Pacheco (“Pacheco”), and CCE’s Associate Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B 08/17/2965, in Brazil), and totally fabricated and false claims, to file the first²¹⁶ Domestic Repeat Violence Suit (the first “**Sham Fraga I**”) against Tavares, see Case No. 2012-003753-FC-04 in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”). BRIDGELOAN’s CCE causes the Sham Fraga I case to be presided by an Associate, reckless corrupt Judge Joseph I. Davis Jr. (“Judge Davis Jr.”). As with the other sham Related Cases against Tavares, the Perpetrators surround the sham proceedings with their Associates, and systematically and continuously threaten, coerce, and extort Tavares and Tavares’ attorneys.

²¹⁴ See the sham *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon v. Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (the “BRIDGELOAN Case”) before the subverted Miami Courts.

²¹⁵ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

²¹⁶ After the Sham Fraga I case is dismissed, without prejudice, by corrupt Judge Davis Jr. on July 11, 2012, BRIDGELOAN’s CCE causes, on October 3, 2012, a second sham SLAPP against Tavares, again using the same Associates, among others, Fraga, Calix, Pacheco, Guimaraes, Peter Francis Valori (“Valori”), Russell Marc Landy (“Landy”), and corrupt Judge Davis Jr., with same sham false and contradictory claims, and without any shred of evidence, see *Geania A. Fraga v. Charles Tavares*, Case No. 2012-24483-FC-04 (the “Double-Jeopardy Fraga II”), against Tavares’ rights, the law, and the Constitution’s Double-Jeopardy Clause.

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](#).

* In July 2005, as part of an elaborate artifice in the underlying scheme by Associates of the Criminal Enterprise, among others, criminals Thomas R. Lehman ("Lehman") (Florida Bar No. 351.318), and Marco E. Rojas ("Rojas") (Florida Bar No. 940.453), both representing unsuspecting client Tavares upon the United States Bankruptcy for the Southern District of Florida ("Bankruptcy Court"), in a case presided by Judge Robert A. Mark ("Judge Mark") (Florida Bar No.260.886), where Tavares is buying a certain 9 acres Miami River Property at 2051 N.W. 11 Street, Miami, Florida 33125 ("Marina Property") – one of two Properties later extorted from Tavares in the BRIDGELOAN Case, from Consolidated Yacht Corporation ("Consolidated") (Tax Id. #65-0242347), having Alan L. Goldberg ("Trustee Goldberg"), and Ross Robert Hartog ("Hartog") (Florida Bar No. 272.360) at Markowitz Trustee, as Consolidated's Registered Agent, see www.sunbiz.org, at Document #S28046, 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.

COUNTS

Count 727 - 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 728 - 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 729 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 730 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 731 - The Perpetrators Implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the FRAGA I SLAPP, and in [Related Cases](#) upon the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Court”), Electronic Mail, transmitting dozens of false, invalid, and fraudulent documents by electronic means to further schemes depriving and extorting, among others, U.S. citizen Charles Tavares of properties and rights, 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.

Count 732 - Peter Francis Valori (“Peter”), Thomas Ralph Lehman (“Lehman”), Marco Emilio Rojas (“Rojas”), Hugo Barreto Del Priore (“Del Priore”), Olten Ayres de Abreu Junior (“Abreu Jr.”), and other Perpetrators implicated, Associated with BRIDGELoAN’s CCE, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, and extort Charles Tavares of properties and rights, in order to further a continuous scheme depriving stealing, and extorting his properties, 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 733 - At all times relevant, the 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 734 - The Perpetrators Implicated, knowingly and intentionally, file the Sham Fraga I lawsuit ("SLAPP") upon the subverted Miami Courts, presided by corrupt Judge Joseph I. Davis, Jr. ("Judge Davis Jr.") against U.S. citizen and victim Charles Tavares ("Tavares"), with false, fabricated, and fraudulent claims and pleadings, supported by false witnesses Geania Alves Fraga ("Fraga"), Maritza C. Calix ("Calix"), Dunia Irene Pacheco ("Pacheco"), and Gabriela Maranhao Machado Guimaraes ("Guimaraes"), and systematically coerces, threaten, intimidate, deprive, and extort victim Tavares of properties and rights, under color of law, furthering an underlying scheme extorting Tavares of all properties and rights, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

735	February, 28, 2012	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Alan Samuel Fine Alan S. Fine, P.A. The Continued Criminal Enterprise
736		§ 241 Conspiracy Against Rights &	
737		§ 242 Deprivation Rights Under Color of Law &	
738		§ 1346 Scheme/Artifice to Defraud &	
739		§ 1341 Mail Fraud &	
740		§ 1961 <i>et seq.</i> – RICO &	
741		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices &	
742	<u>Florida Bar Rules of Professional Conduct</u> Misconduct – Rule 4-8.4 (a)(b)(c)(d)		

On February 28, 2012, criminal Alan Samuel Fine (“Fine”), an attorney and Associate of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Criminal Enterprise,²¹⁷ to further a brazen scheme, systematically and continuously depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), files, with unclean hands,²¹⁸ a sham **Notice of Change of Address** (“Fine’s Sham Change of Address”). Fine’s Sham Change of Address, is to, among other things, show to other Associates²¹⁹ of BRIDGELoAN’s CCE, Fine’s continued commitment to the scheme – the CCE’s **Omertà Code**, depriving and extorting Tavares upon the sham proceedings.

²¹⁷ BRIDGELoAN is an entity used by Joseph Horn’s (“Horn”) Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF.

²¹⁸ Fine is a longtime Associate and attorney of BRIDGELoAN, and as part of the underlying scheme to deprive and extort Tavares and Tavares’ Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”) of properties valued in excess of \$50 million dollars (“Tavares’ Properties”). As part of the scheme, Fine covertly represents, in fatal conflict of interest, Tavares’ investor and Third-Party Defendant Romulo Pina Dantas (“Dantas”). After the successful extortion of Tavares’ Properties in a **sham staged unnoticed and invalid Trial** of April 8, 2011, predicated on a sham settlement further predicated on sham Power of Attorneys of Tavares’ Companies, fabricated by Thomas R. Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and opposing parties, Fine, following orders of April 7, 2011 from CCE’s Associate Lehman, starts fabricating totally false, invalid, and fraudulent Corporate Resolutions and Indicia of Membership Interest of Tavares’ Companies to hijack Tavares’ companies and cover up the brazen schemes upon the Court.

²¹⁹ The Record shows Tavares’ former attorneys Lehman and LKLS+G, fired by Tavares since April 2011, in a continuous unauthorized and fraudulent representation of Tavares’ Companies to willfully prevent justice and cover up the schemes.

COUNTS

Count 735 - 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 18 U.S.C. §371.

Count 736 - 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 737 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 738 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 739 – Alan Samuel Fine, Alan S. Fine, P.A. (collectively “Fine”), at 255 Aragon Avenue, 2nd Floor, Coral Gables, Florida 33134 – Telephone: (305) 424-2400 and Telefax: (305) 424-2401, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, U.S. Postal Mail, to wit – among others, certain U.S. Postal Mail with a certain sham **Notice of Change of Address**, signed and dated on February 24, 2012, to further the scheme upon the courts extorting Charles Tavares of properties and rights. Fine’s sham Notice of Change of Address to further the scheme, is mailed on February 24, 2012, and filed with the Miami Courts on February 28, 2012, stating, *inter alia*, “*Certificate of Service – I Hereby Certify that a true and correct copy of the foregoing was served on this 24th day of February 2012, via U.S. Mail to*” **(739a)** “*Levine, Kellogg, Lehman, Schneider & Grossman, LLP, Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131*”; To **(739b)** “*Erica L. English, Esq., Katz Barron Squitero Faust, 2699 South Bayshore Drive, 7th Floor, Miami, FL 33133*”; **(739c)** to: “*Matthew P. Leto, Esquire, Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133*”; **(739d)** to: “*Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134*”; and, **(739e)** To: “*Charles Tavares, Pro Se, 444 Brickell Ave., Suite 720, Miami, FL, 33131*”. “ALAN S. FINE, P.A. – Attorneys for Third-Party Defendant Romulo Pina Dantas – 255 Alhambra Circle, Suite 850, Coral Gables, Florida 33130 [33134] Tel. 305-424-2400 Fax: 305-424.2401 /s/ Alan S. Fine Alan S. Fine, FBN 385.824”, in violation of, 18, U.S.C., § 1341.

Count 740 - At all times relevant, Alan Samuel Fine (“Fine”), 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, 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 741 – Alan Samuel Fine (“Fine”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 742 – Alan Samuel Fine (“Fine”) (Florida Bar Number 385.824), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

743	May 22, 2012	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Deutsche Bank Allan Lester Langer Norma Shepard Lindsey Jennifer D. Bailey Victoria Siegler Gisela Cardonne Ely Miami Courts The Continued Criminal Enterprise
744		§ 241 Conspiracy Against Rights &	
745		§ 242 Deprivation Rights Under Color of Law &	
746		§ 1346 Scheme/Artifice to Defraud &	
747		§ 1344 Bank Fraud &	
748		§ 1343 Wire Fraud &	
749		§ 1961 <i>et seq.</i> – RICO &	
750		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On May 22, 2012, Bridgeloan Investors, Inc.'s ("BRIDGELOAN") Transnational Continued Criminal Enterprise ("CCE" or "Criminal Enterprise"), to continue depriving and extorting U.S. citizen and victim Charles Tavares ("Tavares") of all properties and rights, upon subverted courts in the United States of America, causes to be filed, concurrently, their fifth Sham [Related Case](#) against Tavares, the *Deutsche National Bank & Trust v. Charles Tavares*, Case No. 2012-20197-CA-30 ("Deutsche Bank" Case), to, *inter alia*, outwear, destroy and silence Tavares from fighting the ongoing underlying scheme extorting Tavares of more than \$50 million dollars in the BRIDGELOAN Case.²²⁰ As part of the underlying scheme, during more than fifteen (15) years, Tavares' attorneys, among others, Stephen Ames Freeman ("Freeman"), Robert Michael Haber ("Haber"), Nelson Slosberas ("Slosbergas"), Alan Samuel Fine ("Fine"), Marco Emilio Rojas ("Rojas"), and Nicholas Stanham ("Stanham"), covertly, intentionally and knowingly, entrap Tavares in sham loans with BRIDGELOAN and associated partners,²²¹ while systematically undermining, with privileged information, Tavares' real estate businesses and properties securing the sham loans, and coercing Tavares' partners, investors, and prospective buyers to stop deals with Tavares, to cause defaults and hardships, so BRIDGELOAN's CCE can extort Tavares of all properties and rights, under color of law, upon subverted Miami Courts. As part of the scheme, BRIDGELOAN causes corrupt Judge Langer to preside the Deutsche Bank Case, while **concurrently presiding three (3) other Related Cases** against Tavares, in order to deprive, extort, and cover up the schemes, preventing justice. Upon the retirement of corrupt Judge Langer in December 2012, BRIDGELOAN's CCE causes corrupt Judge Lindsey, to preside the sham Deutsche Bank Case to continue the extortion, and the cover up to prevent justice.

²²⁰ See, *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC* a.k.a. The Bank of New York Mellon ("BNY Mellon"), Case No. 2009-93058-CA-30 upon the subverted Miami Courts, and intentionally presided by the same corrupt implicated Judge Allan Lester Langer ("Judge Langer"), and upon Judge Langer's retirement, by corrupt Norma Shepard Lindsey ("Judge Lindsey") – wife to BNY Mellon's implicated attorney Harold Eugene Lindsey III ("Lindsey III").

²²¹ In the Sham Deutsche Bank loan, as part of the underlying scheme, Tavares is unsuspectingly represented by attorneys Rojas and Haber, longtime Associates of BRIDGELOAN's CCE.

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

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

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

** On October 12, 1994, criminals Freeman and Slosbergas at FHR&S a.k.a. Freeman, Newman & 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.

COUNTS

Count 743 - 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 744 - 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 745 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 746 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 747 - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to further an underlying scheme, under color of law, defrauding, among others, Deutsche National Bank & Trust ("Deutsche Bank") (NYSE: "DB"), by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enabling and facilitating the deprivation and extortion of borrower and U.S. citizen Charles Tavares ("Tavares") of properties and rights stemming from sham loans further showing Deutsche Bank and its agents and representatives repeatedly enabling and facilitating the scheme depriving and extorting, *inter alia*, Tavares, the United States of America, and Deutsche Bank's Shareholders in subverted court proceedings in the sham case *Deutsche Bank & National Trust v. Charles Tavares*, Case No. 2012-20197-CA-30 in The Eleventh Judicial Circuit in and for Miami-Dade County, Florida, in violation of, 18 U.S.C. §1344.

Count 748 - The Perpetrators Implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the Deutsche Bank Case, and in upon the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Court"), Electronic wire, transmitting dozens of false and fraudulent documents by electronic means to further schemes depriving and extorting, among others, U.S. citizen Charles Tavares of properties and rights, 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.

Count 749 - At all times relevant, the 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, 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 750 - The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid, and fraudulent claims and pleadings, intimidating, coercing, and extorting client Charles Tavares of properties and rights in the *Deutsche National Bank & Trust v. Charles Tavares*, Case No. 2012-20197-CA-30 (“Deutsche Bank” Case), and furthering underlying schemes, in violation of, §817.155, F.S. (Fraudulent Practices).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
751	June 6, 2012	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Ross Robert Hartog Jerry Maurice Markowitz Markowitz Ringel Trusty Hartog, P.A.
752		§ 241 Conspiracy Against Rights &	Joseph Horn Ralph Horn
753		§ 242 Deprivation Rights Under Color of Law &	Ricardo Eichenwald Fernando Braghin
754		§ 1346 Scheme/Artifice to Defraud &	Bridgeloan Investors, Inc. Marco Antonio de Souza
755		§ 1343 Wire Fraud &	BANIF Brickell, LLC BRIXRIV, LLC
756		§ 1961 <i>et seq.</i> – RICO &	Matthew Paul Leto Andrew Clifford Hall
757		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	Hall Lamb and Hall, P.A. Olten Ayres de Abreu Junior Miami Courts The Continued Criminal Enterprise

On June 6, 2012, Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), to continue depriving and extorting U.S. citizen and victim Charles Tavares (“Tavares”) of all properties and rights, upon subverted courts in the United States of America, causes to be filed, concurrently, their **Sixth Sham Related Case** against Tavares’ Company Miami River Park Marina, Inc. (“MRPM” or “Tavares’ Company”), the *Markowitz Ringel Trusty & Hartog, P.A., Escrow Agent v. BRIXRIV, LLC, and Miami River Park Marina, Inc.*, Case No. 2012-21795-CA-22 (“Markowitz” Case), to, *inter alia*, deprive and extort Tavares and Tavares’ Companies of moneys, outwear, destroy and silence Tavares from fighting the ongoing underling scheme extorting Tavares of more than \$50 million dollars in the BRIDGELOAN Case.²²⁰ As part of the underlying scheme, BRIDGELOAN’s CCE causes Tavares’ MRPM’s Escrow Agent Markowitz Ringel Trusty & Hartog, P.A. f/k/a Markowitz Davis Ringel & Trusty, P.A. (“Markowitz”), with unclean hands, to file a sham lawsuit to release Tavares’ MRPM’s escrow moneys to a non-party BRIXRIV, LLC, a Florida L.L.C. (“BRIXRIV”) (Tax Id. None). As with the other Five ongoing Related Cases, BRIDGELOAN’s CCE and its Associates²²¹ easily subvert and corrupt the Miami Courts to systematically deprive and extort Tavares of properties and rights upon the sham proceedings, successfully depriving and extorting over \$100,000 in escrow funds, further causing the Miami Courts to money launder the ill-gotten proceeds.

²²⁰ See, *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Romulo Pina Dantas, v. MUNB Loan Holdings, LLC* a.k.a. The Bank of New York Mellon (“BNY Mellon”), Case No. 2009-93058-CA-30 upon the subverted Miami Courts, and intentionally presided by the same corrupt implicated Judges Allan Lester Langer (“Judge Langer”), and upon Judge Langer’s retirement, by corrupt Norma Shepard Lindsey (“Judge Lindsey”) – wife to BNY Mellon’s implicated attorney Harold Eugene Lindsey III (“Lindsey III”).

²²¹ In the Sham Markowitz Case, BRIXRIV is represented by BRIDGELOAN’s attorneys Matthew Paul Leto (“Leto”) and Andrew Clifford Hall (“Andy Hall”) at Hall Lamb and Hall, P.A. (“Hall & Lamb”), implicated in major frauds and extortion in the related BRIDGELOAN Case, successfully depriving and extorting, under color of law, Tavares of more than \$50 million dollars.

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.

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

COUNTS

Count 751 - 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 752 - 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 753 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 754 - 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, and defraud citizens of properties and rights in the *Markowitz Ringel Trusty & Hartog, P.A., Escrow Agent v. BRXRIV, LLC, and Miami River Park Marina, Inc.*, Case No. 2012-21795-CA-22 (“Markowitz” Case), and 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 755 - The Perpetrators Implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the *Markowitz Ringel Trusty & Hartog, P.A., Escrow Agent v. BRXRIV, LLC, and Miami River Park Marina, Inc.*, Case No. 2012-21795-CA-22 (“Markowitz” Case), upon the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) (“Miami Court”), Electronic wire, transmitting several false and fraudulent documents by electronic means to further schemes depriving and extorting, among others, U.S. citizen Charles Tavares of properties and rights, 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.

Count 756 - At all times relevant, the 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, 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 757 - The Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen and client Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating false, invalid claims and pleadings in the *Markowitz Ringel Trusty & Hartog, P.A., Escrow Agent v. BRXRIV, LLC, and Miami River Park Marina, Inc.*, Case No. 2012-21795-CA-22 ("Markowitz" Case), and filing sham claims with the Miami Courts, systematically, knowingly and intentionally depriving Tavares of constitutionally guaranteed rights and properties upon sham court proceedings upon the Miami Courts, intimidating, coercing, and extorting Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

758	June 26, 2012	<u>U. S. CODE TITLE 18</u>	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. The Continued Criminal Enterprise
759		§ 371 Conspiracy to Defraud the USA &	
760		§ 241 Conspiracy Against Rights &	
761		§ 242 Deprivation Rights Under Color of Law &	
762		§ 1346 Scheme/Artifice to Defraud &	
763		§ 1341 Mail Fraud &	
764		§ 1961 <i>et seq.</i> – RICO &	
		<u>FLORIDA STATUTES</u>	
	Title XLVI § 817.155 Fraudulent Practices		

On June 26, 2012, shameless attorneys Matthew Paul Leto (“Leto”), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, as Tavares is uncovering and filing evidence of fraud upon the courts by officers²²² of the courts, [file](#), with unclean hands, on behalf of Bridgeloan Investors, Inc.²²³ (“BRIDGELOAN”), a Sham BRIDGELOAN’s [Motion to Preclude Charles Tavares from Further Filings and to Close File](#) (“**Sham Motion to Silence Victim Tavares**”) (Leto’s Doc. #9881/00268210.1), to, *inter alia*, silence victim Tavares from further exposing the patent frauds upon the courts by officers of the courts successfully depriving and extorting Tavares and Tavares Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”) of more than \$50 million dollars and rights, under color of law, further depriving the State of Florida and the United States of honest services upon courts of law. As part of the scheme, Leto, *et al.*, make numerous statements, and contradictory evidence supporting the false claims to the Court that they know in truth and in fact to be false and fraudulent, *inter alia*, that, **“THIS ACTION was tried before the Court on April 8, 2011 on notice to all parties.”** See Exhibit “B” Final Judgment of Foreclosure. At all relevant times, Leto, *et al.*, know that there was not a **“Trial”** on April 8, 2011, and that they staged a sham unnoticed **“Trial”** to enter an invalid and fraudulent Judgement, systematically and continuously perpetrating major crimes, under color of law, against Tavares and the United States, to further underlying continued schemes.

²²² Among other Perpetrators Implicated, corrupt Judge Allan Lester Langer (“Judge Langer”), Leto, Andy Hall, Hall & Lamb, Larry Allen Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), Black & Srebnick, P.A., Erica Lee English (“English”), Harold Eugene Lindsey III (“Lindsey III”), and Tavares’ former personal and corporate attorneys Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), LKLS+G, LLP, still in a willful unauthorized and fraudulent representation after fired by Tavares.

²²³ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

COUNTS

Count 758 - 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 759 - 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 760 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 761 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 762 – Matthew Leto, Andrew Hall, Hall Lamb and Hall, P.A. (collectively “Hall & Lamb”), at 2665 South Bayshore Drive, Penthouse 1, Miami, FL 33133, and other Perpetrators implicated, did knowingly and intentionally use as an artifice to further a criminal scheme, depriving and extorting Charles Tavares (“Tavares”) of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Court”), transmitting, Via U.S. Postal Mail, on June 26, 2012, a certain [Motion to Preclude Charles Tavares from Further Filings and to Close File \(Sham Motion to Silence Victim Tavares\)](#) (Leto’s Doc. #9881\ 00268210.1) and contradictory supporting evidence, The Trial Proceedings Transcript of April 8, 2011, as Exhibit “A”, and the sham Final Judgment of Foreclosure of April 8, 2011, as Exhibit “B”, fraudulently stating, *inter alia*, that, **“THIS ACTION was tried before the Court on April 8, 2011 on notice to all parties”**, knowingly and intentionally, to silence victim Tavares and to cover up the scheme extorting \$50 million dollars of properties from Tavares’ Companies, to wit - **762(a) From Hall & Lamb To:** Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **762(b) From Hall & Lamb To:** Erica English, Esq., Katz Barron Faust Squitiero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; **762(c) From Hall & Lamb To:** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and Via Certified Mail **762(d) From Hall & Lamb, Via Certified Mail To:** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131, to further the schemes, in violation of, Title 18, U.S.C., §1341.

Count 763 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 764 - Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further the brazen scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

765	<p>June 27, 2012 Docketed by a Clerk of the Courts at 6:20 PM</p>	<p><u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation Rights Under Color of Law & § 1346 Scheme/Artifice to Defraud & § 1341 Mail Fraud & § 1343 Wire Fraud & § 1961 <i>et seq.</i> – RICO & FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices</p>	<p>Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. The Continued Criminal Enterprise</p>
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On June 27, 2012, at 6:20 p.m., shameless attorneys Matthew Paul Leto (“Leto”), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, as Tavares is uncovering and filing evidence of fraud upon the courts by officers²²⁴ of the courts, [file](#), with unclean hands, on behalf of Bridgeloan Investors, Inc.²²⁵ (“BRIDGELoAN”), a Sham Notice of Hearing (“**Sham Notice of Hearing to Silence Tavares**”), on BRIDGELoAN’s Motion to Preclude Charles Tavares from Further Filings and to Close File (“**Sham Motion to Silence Victim Tavares**”), to, *inter alia*, silence victim Tavares from further exposing the patent frauds upon the courts by officers of the courts successfully depriving and extorting Tavares and Tavares Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”) of more than \$50 million dollars and rights, under color of law, further depriving the State of Florida and the United States of honest services upon courts of law. At all relevant times, the Perpetrators know that they are perpetrating major crimes, under color of law, against Tavares, the State of Florida and the United States, to further underlying racketeering schemes.

²²⁴ Among other Perpetrators Implicated, corrupt Judge Allan Lester Langer (“Judge Langer”), Leto, Andy Hall, Hall & Lamb, Larry Allen Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), Black & Srebnick, P.A., Erica Lee English (“English”), Harold Eugene Lindsey III (“Lindsey III”), and Tavares’ former personal and corporate attorneys Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), LKLS+G, LLP, still in a willful unauthorized and fraudulent representation after fired by Tavares.

²²⁵ BRIDGELoAN is an entity used by Joseph Horn’s (“Horn”) Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

COUNTS

Count 765 - 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 766 - 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 767 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 768 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 769 – Matthew Leto, Andrew Hall, Hall Lamb and Hall, P.A. (collectively “Hall & Lamb”), at 2665 South Bayshore Drive, Penthouse 1, Miami, FL 33133, and other Perpetrators implicated, did knowingly and intentionally use as an artifice to further a criminal scheme, depriving and extorting Charles Tavares (“Tavares”) of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Court”), transmitting, Via U.S. Postal Mail, on June 27, 2012, a certain **Sham Notice of Hearing to Silence Tavares** on BRIDGELoAN’s Motion to Preclude Charles Tavares from Further Filings and to Close File (“**Sham Motion to Silence Victim Tavares**”), (Leto’s Doc. #9881\ 002236605.1), **setting the sham hearing for Tuesday, July 10, 2012 at 9:00 a.m.**, knowingly and intentionally, to silence victim Tavares and to cover up the scheme extorting \$50 million dollars of properties from Tavares’ Companies, to wit – **769(a) From Hall & Lamb To:** Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **769(b) From Hall & Lamb To:** Erica English, Esq., Katz Barron Faust Squitero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; **769(c) From Hall & Lamb To:** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and Via Certified Mail **769(d) From Hall & Lamb To:** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131, to further the schemes, in violation of, Title 18, U.S.C., §1341.

Count 770 – Matthew Leto, Andrew Hall, Hall Lamb and Hall, P.A. (collectively “Hall & Lamb”), at 2665 South Bayshore Drive, Penthouse 1, Miami, FL 33133, Facsimile (305) 374-5033,, and other Perpetrators implicated, did knowingly and intentionally use as an artifice to further a criminal scheme, depriving and extorting Charles Tavares (“Tavares”) of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Court”), transmitting, Via Electronic Facsimile, on June 27, 2012, a certain **Sham Notice of Hearing to Silence Tavares** on BRIDGELOAN’s Motion to Preclude Charles Tavares from Further Filings and to Close File (“**Sham Motion to Silence Victim Tavares**”), (Leto’s Doc. #9881\ 002236605.1), knowingly and intentionally, to silence victim Tavares and to cover up the scheme extorting \$50 million dollars of properties from Tavares’ Companies, to wit - **770(a) From Hall & Lamb To:** Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **770(b) From Hall & Lamb To:** Erica English, Esq., Katz Barron Faust Squitero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; **770(c) From Hall & Lamb To:** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and Via Certified Mail **770(d) From Hall & Lamb To:** Charles Tavares, at 444 Brickell Avenue, Suite 415, Miami, Florida 33131, to further the schemes, in violation of, Title 18, U.S.C., §1343.

Count 771 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 772 - Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further the brazen scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

773	July 13, 2012	<u>U. S. CODE TITLE 18</u>	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. The Continued Criminal Enterprise
774		§ 371 Conspiracy to Defraud the USA &	
775		§ 241 Conspiracy Against Rights &	
776		§ 242 Deprivation Rights Under Color of Law &	
777		§ 1346 Scheme/Artifice to Defraud &	
778		§ 1341 Mail Fraud &	
779		§ 1343 Wire Fraud &	
780		§ 1961 <i>et seq.</i> – RICO & <u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On July 13, 2012, shameless attorneys Matthew Paul Leto (“Leto”), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, as Tavares is uncovering and filing evidence of fraud upon the courts by officers of the courts, [file](#), with unclean hands, on behalf of Bridgeloan Investors, Inc.²²⁶ (“BRIDGELOAN”), a [Sham Re-Notice of Hearing](#)²²⁷ (“**Sham Re-Notice of Hearing to Silence Tavares**”), on BRIDGELOAN’s Motion to Preclude Charles Tavares from Further Filings and to Close File (“**Sham Motion to Silence Victim Tavares**”), to, *inter alia*, silence victim Tavares from further exposing the patent frauds upon the courts by officers of the courts successfully depriving and extorting Tavares and Tavares Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”) of more than \$50 million dollars and rights, under color of law, further depriving the State of Florida and the United States of honest services upon courts of law. At all relevant times, the Perpetrators know that they are perpetrating major crimes, under color of law, against Tavares, the State of Florida and the United States, to further underlying racketeering schemes.

²²⁶ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

²²⁷ Previously, the Perpetrators had noticed the sham hearing on BRIDGELOAN’s Sham Motion to Silence Victim Tavares for [July 10, 2012 at 9:00 a.m.](#) Upon Tavares’ new attorneys Buchanan Ingersoll & Rooney, P.C.’s (“Buchanan Ingersoll”) filing, on July 9, 2012, a Notice of Appearance on behalf of Tavares and Tavares’ Companies, the Perpetrators’ artifice for the sham hearing unravel, and Leto files the Sham Re-Notice of Hearing to Silence Tavares **three (03) days after** the hearing should have taken place, in order to, *inter alia*, conspire to further the scheme, and showing continued reckless disregard for the rules.

COUNTS

Count 773 - 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 774 - 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 775 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 776 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 777 – Matthew Leto, Andrew Hall, Hall Lamb and Hall, P.A. (collectively “Hall & Lamb”), at 2665 South Bayshore Drive, Penthouse 1, Miami, FL 33133, and other Perpetrators implicated, did knowingly and intentionally use as an artifice to further a criminal scheme, depriving and extorting Charles Tavares (“Tavares”) of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Court”), transmitting, Via U.S. Postal Mail, on July 12, 2012, a certain [Sham Re-Notice of Hearing to Silence Tavares](#) on BRIDGELoAN’s Motion to Preclude Charles Tavares from Further Filings and to Close File (“Sham Motion to Silence Victim Tavares”), (Leto’s Doc. #9881\ 00270180.1), filed with the Miami Courts on July 13, 2012, **setting the sham hearing for Tuesday, July 24, 2012 at 10:30 a.m.**, knowingly and intentionally, to silence victim Tavares and to cover up the scheme extorting \$50 million dollars of properties from Tavares’ Companies, to wit – **777(a) From Hall & Lamb To:** Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **777(b) From Hall & Lamb To:** Erica English, Esq., Katz Barron Faust Squitero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; **777(c) From Hall & Lamb To:** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and Via Certified Mail **777(d) From Hall & Lamb To:** James Doddo, Esq., Buchanan Ingersoll & Rooney, PC, Miami Tower, Suite 3500, Miami, Florida 33131, to further the schemes, in violation of, Title 18, U.S.C., §1341.

Count 778 – Matthew Leto, Andrew Hall, Hall Lamb and Hall, P.A. (collectively “Hall & Lamb”), at 2665 South Bayshore Drive, Penthouse 1, Miami, FL 33133, Facsimile (305) 374-5033,, and other Perpetrators implicated, did knowingly and intentionally use as an artifice to further a criminal scheme, depriving and extorting Charles Tavares (“Tavares”) of properties and rights upon sham court proceedings in the styled-case *Bridgeloan Investors, Inc. v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas, v. MUNB Loan Holdings LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Court”), transmitting, Via Electronic Facsimile, on July 12, 2012, a certain [Sham Re-Notice of Hearing to Silence Tavares](#) on BRIDGELoAN’s Motion to Preclude Charles Tavares from Further Filings and to Close File (“Sham Motion to Silence Victim Tavares”), (Leto’s Doc. #9881\ 00270180.1), filed with the Miami Courts on July 13, 2012, knowingly and intentionally, to silence victim Tavares and to cover up the scheme extorting \$50 million dollars of properties from Tavares’ Companies, to wit - **778(a) From Hall & Lamb To:** Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Miami Center – 34th Floor, 201 S. Biscayne Blvd., Miami, FL 33131; **778(b) From Hall & Lamb To:** Erica English, Esq., Katz Barron Faust Squitero, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133; **778(c) From Hall & Lamb To:** Jorge L. Fors, Esq., Jorge L. Fors, P.A., 1108 Ponce de Leon, Coral Gables, FL 33134; and **778(d) From Hall & Lamb To:** James Doddo, Esq., Buchanan Ingersoll & Rooney, PC, Miami Tower, Suite 3500, Miami, Florida 33131, to further the schemes, in violation of, Title 18, U.S.C., §1343.

Count 779 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 780 - Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further the brazen scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

781	July 24, 2012	U. S. CODE TITLE 18	Allan Lester Langer Miami Courts The Continued Criminal Enterprise
782		§ 371 Conspiracy to Defraud the USA &	
783		§ 241 Conspiracy Against Rights &	
784		§ 242 Deprivation Rights Under Color of Law &	
785		§ 1346 Scheme/Artifice to Defraud &	
786		§ 1961 <i>et seq.</i> – RICO & FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

On July 24, 2012, shameless corrupt Judge Allan Lester Langer (“Judge Langer”)(Florida Bar No.137.828) in reckless disregard for the record displayed, to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, by officers²²⁸ of the courts, enters, with unclean hands, a sham [Order granting Bridgeloan Investors, Inc. \(“BRIDGELoAN”\), sham Motion to Preclude Charles Tavares from Further Filings and to Close File \(“Order to Silence Victim Tavares”\)](#), to, *inter alia*, silence victim Tavares from further exposing²²⁹ the patent frauds upon the courts by officers of the courts successfully depriving and extorting Tavares and Tavares Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”) of more than \$50 million dollars and rights, under color of law, further depriving the State of Florida and the United States of honest services upon courts of law. As part of the scheme, BRIDGELoAN’s attorneys Leto and Andy Hall, knowingly and intentionally make numerous statements, and present contradictory evidence supporting the false claims to the Court that they know in truth and in fact to be false and fraudulent, *inter alia*, that, **“THIS ACTION was tried before the Court on April 8, 2011 on notice to all parties.”** See Exhibit “B” Final Judgment of Foreclosure. At all relevant times, Leto, *et al.*, know that there was never a **“Trial”**, and the sham void Final Judgment is another artifice to deprive and extort Tavares.

²²⁸ Among other Perpetrators Implicated, corrupt Judge Allan Lester Langer (“Judge Langer”), Leto, Andy Hall, Hall & Lamb, Larry Allen Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), Black & Srebnick, P.A., Erica Lee English (“English”), Harold Eugene Lindsey III (“Lindsey III”), and Tavares’ former personal and corporate attorneys Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), LKLS+G, LLP, still in a willful unauthorized and fraudulent representation after fired by Tavares.

²²⁹ Tavares, around April 2012, engages Buchanan Ingersoll & Rooney, P.C. (“Buchanan Ingersoll”) to represent Tavares in the BRIDGELoAN Case. After months of careful review of the facts and record displayed at the time, Managing Partner Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), leading the case, states to Tavares that, **“Charles, after more than 20 years working in Miami, I never seen anything like this before”**, referring to, *inter alia*, the amount of brazen frauds upon the court in the BRIDGELoAN Case, which at that time were just starting to unravel, and before the limited discovery produced in the fraud and legal malpractice case *Charles Tavares, Brickell Village One, LLC and 2147 SW 8 Street, LLC v. Thomas Ralph Lehman and LKLS+G, LLP* Case (Case No.2013-12223-CA-40), showing major frauds, systematic extortion and violations of law and rights by officers of the courts, together with BRIDGELoAN’s Transnational Continued Criminal Enterprise (“BRIDGELoAN’s CCE”).

COUNTS

Count 781 - 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 782 - 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 783 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 784 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 785 - At all times relevant, corrupt Judge Allan Lester Langer (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 786 - corrupt Judge Allan Lester Langer (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices, *inter alia*, entering a [sham Order to Silence Victim Tavares](#), and several other sham Orders to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further the brazen scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT **APROX. DATE**

VIOLATIONS

PERPETRATORS

787	August 28, 2012	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Elsa S. Fresco Carol A. Greco Stuart I. Grossman Lawrence A. Kellogg David M. Levine Jeffrey C. Schneider LKLS+G, LLP The Continued Criminal Enterprise
788		§ 241 Conspiracy Against Rights &	
789		§ 242 Deprivation Rights Under Color of Law &	
790		§ 1346 Scheme/Artifice to Defraud &	
791		§ 1343 Wire Fraud &	
792		§ 1961 <i>et seq.</i> – RICO &	
793		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
794	Florida Bar Rules of Professional Conduct Misconduct – Rule 4-8.4 (a)(b)(c)(d)		

On August 28, 2012, criminals and reckless attorneys Thomas R. Lehman (“Lehman”) (Florida Bar No. 351.318), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Associates of Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Criminal Enterprise,²³⁰ to further a brazen scheme, systematically and continuously depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), file, with unclean hands, a sham **Designation of E-Mail Addresses** (“[LKLS+G’s Sham Notice](#)”), fraudulently representing Tavares’ Companies Defendants Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”) (collectively “Tavares’ Companies”). At all relevant times, Lehman and LKLS+G, Tavares’ former personal and Tavares’ Companies’ attorneys, are secretly conspiring to deprive and extort Tavares of properties and rights in the sham BRIDGELOAN Case. Upon the successful extortion of Tavares’ Properties, valued over \$50 million dollars, in a **sham staged unnoticed and invalid Trial of April 8, 2011**, as Tavares starts uncovering the scheme, Tavares fires Lehman and LKLS+G in April 2011, and files the first Florida Bar Complaint No. 2011-71,184(III). Despite being fired, shameless criminals Lehman and LKLS+G continue in an unauthorized and fraudulent representation to prevent justice and cover up. LKLS+G’s Sham Notice is to, *inter alia*, show to Associates of BRIDGELOAN’s CCE, LKLS+G’s continued commitment to the scheme – the CCE’s **Omertà Code**, and make sure that all Perpetrators continue the extortion. At all relevant times, all partners of LKLS+G know, and had to know that they are extorting Tavares.

²³⁰ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF.

COUNTS

Count 787 - 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 18 U.S.C. §371.

Count 788 - 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 789 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 790 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 791 – Shameless criminals Thomas Ralph Lehman (“Lehman”) (trl@lklsg.com) and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”) (cag@lklsg.com & esf@lklsg.com), at 201 South Biscayne Boulevard, 22nd Floor, Miami, Florida 33131 – Tel. (305) 403-8788 & Fax: (305) 403-8789, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, certain Electronic Mail with a certain sham **Designation of E-Mail Addresses** (LKLS+G Doc. #G90317), signed and dated on August 28, 2012, to further the scheme upon the courts extorting Charles Tavares of properties and rights. Lehman and LKLS+G’s [sham Designation of E-mail Addresses](#) (LKLS+G Doc. #G90317), to further the scheme, is electronically transmitted on August 28, 2012, stating, *inter alia*, “*Certificate of Service – I Hereby Certify that a true and correct copy of the foregoing was served on this 28th day of August 2012, via E-mail to all parties on the attached service list. /s/ Thomas R. Lehman – Thomas R. Lehman, P.A. SERVICE LIST (791a) To: “Matthew P. Leto, Esq. mletto@hlhlawfirm.com, Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133”; To (791b) “Erica L. English, Esq. ele@katzbarron.com, Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133”; (791c) To: “Jorge L. Fors, Esq. jfors@forslegal.com, Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134”; and, (791d) To: “Richard A. Morgan, Esq. richard.Morgan@bipc.com – James Doddo, Esq. james.doddo@bipc.com, Buchanan Ingersoll & Rooney, P.C., Miami Tower, 100 SE Second Street, Miami, Florida 33131”*, in violation of, 18, U.S.C.,§ 1343.

Count 792 - At all times relevant, shameless criminals Thomas Ralph Lehman (“Lehman”) and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), 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, 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 793 – Shameless criminals Thomas Ralph Lehman (“Lehman”) and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other 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 client Charles Tavares to further a scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 794 – Shameless criminals Thomas Ralph Lehman (“Lehman”) (Florida Bar Number 351.318), and other Perpetrators implicated, [Florida Bar](#) licensed attorneys, and officers of the courts, knowingly and intentionally use their Bar license as guise to commit crimes, willfully participating in a known scheme depriving and extorting Tavares, and Tavares’ Companies MRPM, BV One, and 2147 of properties, rights, and honest services upon courts of law, furthering underlying criminals schemes, systematic forgery, fabrication of fraudulent corporate documents, staying in an unauthorized and fraudulent representation, for over sixteen (16) months after being fired by client Charles Tavares (“Tavares”), purportedly on behalf of Tavares’ Companies Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (“collectively “Tavares’ Companies), and furthering systematic tax frauds, bank, mortgage, and securities frauds, intercontinental money laundering of illicit funds through the United States, 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.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

795	October 3, 2012	<u>U. S. CODE TITLE 18</u>	Joseph Horn
		§ 371 Conspiracy to Defraud the USA	Ralph Horn
796		&	Ricardo Eichenwald
		§ 241 Conspiracy Against Rights	Fernando Braghin
797		&	Daniel Ades
		§ 242 Deprivation Rights Under Color of Law	Nelson Slosbergas
798		&	Geania A. Fraga
		§ 1346 Scheme/Artifice to Defraud	Bridgeloan Investors, Inc.
799		&	Hugo Barreto Del Priore
		§ 1343 Wire Fraud	Marco Antonio de Souza
800		&	BANIF
	§ 1951 Extortion (Hobbs Act)	Gabriela Machado Guimaraes	
801		&	Maritza C. Calix
	§ 1961 <i>et seq.</i> – RICO	Dunia Irene Pacheco	
802		&	Peter Francis Valori
	<u>FLORIDA STATUTES</u>	Russell Marc Landy	
	Title XLVI § 817.155 Fraudulent Practices	Joseph I. Davis Jr.	
		Miami Courts	
		The Continued Criminal Enterprise	

On October 3, 2012, as part of a continued scheme to falsely incriminate, outspend, and silence victim Charles Tavares (“Tavares”) in the underlying scheme²³¹, Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise²³² (“CCE” or “Criminal Enterprise”), causes another sham strategic lawsuit (“SLAPP”) against Tavares. The Perpetrators use Manager & Agent Geania Alves Fraga (“Fraga”), supported by false witnesses Maritza C. Calix (“Calix”), Dunia Irene Pacheco (“Pacheco”), and CCE’s Associate Gabriela Machado Guimaraes (“Guimaraes”), and totally fabricated and false claims, to file their Second²³³ Domestic Repeat Violence Suit (“**Sham Double-Jeopardy Fraga II**”) against Tavares, see Case No. 2012-24483-FC-04 in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”). Again, BRIDGELOAN’s CCE causes the Sham Double-Jeopardy Fraga II case to be presided by corrupt Judge Joseph I. Davis Jr. (“Judge Davis Jr.”), to systematically deprive and extort Tavares, under color of law. As in the sham Related Cases against Tavares, the Perpetrators surround the sham proceedings with Associates. On November 5, 2012, after Tavares spends over \$100,000 in legal fees, corrupt Judge Davis Jr. dismisses the Sham Double-Jeopardy Fraga II, causing Tavares irreparable harm forever.

²³¹ See the sham *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon v. Romulo Pina Dantas*, Case No. 2009-93058-CA-30 (the “BRIDGELOAN Case”) before the subverted Miami Courts.

²³² BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Global Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

²³³ BRIDGELOAN’S CCE use in the Sham Sham Double-Jeopardy Case the same Associates from the First Sham *Geania A. Fraga v. Charles Tavares* Case No. 2012-003753-FC-04 (“**Sham Fraga I**”), among others, Fraga, Calix, Pacheco, Guimaraes, Peter Francis Valori (“Valori”), Russell Marc Landy (“Landy”), and corrupt Judge Davis Jr., with same sham false and contradictory claims, and without any shred of evidence, to systematically and continuously deprive and extort Tavares of properties and rights, and willfully defrauding the State of Florida, and the United States of America of honest services upon courts of law.

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 Joesph I. Davis Jr. (“Judge Davis Jr.”), a former partner and president (from 1980 through 2010) of Markowitz, Davis, Ringel & Trusty P.A. n.k.a. Markowitz Ringel Trusty & Hartog, P.A. (“Markowitz Trustee”), that systematically subverts the court proceedings to deprive and extort Tavares, under color of law, to further the criminal extortion of Tavares. See Case No. 2012-024483-FC-04, see also, [Tavares Sworn Affidavit](#). The Criminal Enterprise, with total contempt for the law, the constitution, and Tavares’s rights, systematically and repeatedly, subverts a court of law in the United States of America to further ongoing and continued racketeering schemes against, among others, the United States of America, the State of Florida, and citizen Tavares. The criminals, on the FRAGA II – the Double-Jeopardy sham fabricated case against Tavares, make the same bogus fabricated allegations shown on FRAGA I, and now, claiming for the first time, desperately trying to incriminate and stop Tavares from exposing and fighting the Criminal Enterprise, that, among other things, Tavares, in March 2006, kidnaped Fraga, and drove around pointing a gun to Fraga, and threatening to kill Fraga. See Fraga II Double-Jeopardy Case, Initial Petition at page 2 ¶¶ b, c, and d. After, among other things, the record shows five (05) law firms representing Tavares are intimidated, coerced, and extorted by the Criminal Enterprise, and Tavares is forced to unduly spend more than \$100,000 in legal fees, and costs for the fabricated sham Domestic Repeat Violence Cases, causing Tavares and Tavares’s family to be deeply traumatized and harmed by the extortion in the fabricated sham FRAGA II case, showing that no law-abiding U.S. citizen is safe from the Criminal Enterprise’s subversion of the judicial and political machinery where they operate. On November 5, 2012, corrupt Judge David Jr. dismisses the legal farce *without prejudice*, leaving the doors of the subverted courts open to the Criminal Enterprise’s schemes extorting Tavares under color of law. Concurrently, the Criminal Enterprise continues their systematic ongoing* criminal scheme depriving, stealing, extorting, and silencing, under color of law, Tavares of all properties and rights, so the Criminal Enterprise can continue their ongoing criminal rackets, freely and systematically depriving, stealing, and extorting the United States, the State of Florida, U.S. citizens, and companies, with absolute impunity. See Record.

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

COUNTS

Count 795 - 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 796 - 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 797 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 798 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 799 - The Perpetrators Implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme, depriving, and extorting Charles Tavares of properties and rights upon sham court proceedings in the sham SLAPP Suit *Geania Alves Fraga v. Charles Tavares*, Case No. 2012-24483-FC-04 ("**Sham Double-Jeopardy Fraga II**"), and in [Related Cases](#) upon the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Court"), Electronic Mail, transmitting several false, invalid, and fraudulent documents by electronic means to further schemes depriving and extorting, among others, U.S. citizen Charles Tavares of properties and rights, 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.

Count 800 - Peter Francis Valori ("Peter"), Thomas Ralph Lehman ("Lehman"), Marco Emilio Rojas ("Rojas"), Hugo Barreto Del Priore ("Del Priore"), Olten Ayres de Abreu Junior ("Abreu Jr."), and other Perpetrators implicated, Associated with BRIDGELOAN's CCE, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, and extort Charles Tavares of properties and rights, in order to further a continuous underlying scheme depriving stealing, and extorting his properties, 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 801 - At all times relevant, the 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 in Sham Cases, influencing witnesses, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 802 - The Perpetrators Implicated, knowingly and intentionally, file the sham SLAPP Suit *Geania Alves Fraga v. Charles Tavares*, Case No. 2012-24483-FC-04 ("**Sham Double-Jeopardy Fraga II**"), and in [Related Cases](#) upon the [Eleventh Judicial Circuit for Miami-Dade County, Florida](#) ("Miami Court"), against U.S. citizen and victim Charles Tavares ("Tavares"), with false, fabricated, and fraudulent claims and pleadings, supported by false witnesses Geania Alves Fraga ("Fraga"), Maritza C. Calix ("Calix"), Dunia Irene Pacheco ("Pacheco"), and Gabriela Maranhao Machado Guimaraes ("Guimaraes") (D.O.B. 08/18/1965, in Brazil), and systematically coerces, threaten, intimidate, deprive, and extort victim Tavares of properties and rights, under color of law, furthering an underlying scheme extorting Tavares of all properties and rights, and knowingly and intentionally depriving the State of Florida of honest services upon courts of law in the State of Florida, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

803	October 25, 2012	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. The Continued Criminal Enterprise
804		§ 241 Conspiracy Against Rights &	
805		§ 242 Deprivation Rights Under Color of Law &	
806		§ 1346 Scheme/Artifice to Defraud &	
807		§ 1951 Extortion (Hobbs Act) &	
808		§ 1961 <i>et seq.</i> – RICO &	
809		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On October 25, 2012, shameless attorneys Matthew P. Leto (“Leto”) (Florida Bar No. 14.504), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, make threatening calls to coerce, intimidate, and extort Tavares’ attorneys Richard A. Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), and Carl T. Williams (“Williams”) (Florida Bar No. 529.990), at [Buchanan Ingersoll & Rooney, P.C.](#) (“Buchanan Ingersoll”) (“**Leto & Hall’s Calls 10-25-2012 to Extort Tavares’ Attorneys**”), after Buchanan Ingersoll files, on October 24, 2012, a [Notice of Hearing](#) of November 15, 2012 at 10:30 a.m. (“Notice Hearing to Reopen Case”), on Tavares’ [Motion to Reopen the Case](#) due to massive frauds upon the court by officers of the court, together with Bridgeloan Investors, Inc.’s Transnational Criminal Enterprise²³⁴ (“BRIDGELOAN”), successfully, under color of law, depriving and extorting Tavares of more than \$50 million dollars in properties and rights upon sham proceedings. The Perpetrators, in reckless disregard for the law and rights, after successfully extorting Buchanan Ingersoll, order Buchanan Ingersoll to withdraw Tavares’ Motion to Reopen the Case, cancel the Hearing to Reopen the Case, and to follow a scheme, using their recommended attorney Robert M. Graff (“Graff”) (Florida Bar No. 121.193), to suit Tavares’ former attorneys at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”) for legal malpractice, that would have BRIDGELOAN financing a settlement between Tavares and BRIDGELOAN in order to, *inter alia*, cover up the brazen schemes.

²³⁴ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Continued Transnational Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

COUNTS

Count 803 - 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 804 - 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 805 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 806 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 807 - Matthew Paul Leto ("Leto") (Florida Bar No. 14.504), Andrew Clifford Hall ("Andy Hall"), Hall Lamb and Hall, P.A. ("Hall & Lamb"), and other Perpetrators implicated, Associated with BRIDGELoan's CCE, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, and extort Charles Tavares ("Tavares"), and Tavares' attorneys, *inter alia*, Richard Allen Morgan ("Morgan"), (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), and Carl Tucker Williams ("Williams") (Florida Bar No. 529.990), of properties and rights, in order to further a continuous underlying scheme depriving stealing, and extorting his properties, 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 808 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 809 - Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further the brazen scheme upon the Miami Courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

810	October 26, 2012	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Elsa S. Fresco Carol A. Greco Stuart I. Grossman Lawrence A. Kellogg David M. Levine Jeffrey C. Schneider LKLS+G, LLP The Continued Criminal Enterprise
811		§ 241 Conspiracy Against Rights &	
812		§ 242 Deprivation Rights Under Color of Law &	
813		§ 1346 Scheme/Artifice to Defraud &	
814		§ 1341 Mail Fraud &	
815		§ 1343 Wire Fraud &	
816		§ 1961 <i>et seq.</i> – RICO &	
817		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On October 26, 2012, criminals and reckless attorneys Thomas R. Lehman (“Lehman”) (Florida Bar No. 351.318), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Associates of Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Criminal Enterprise, to further a brazen scheme, systematically and continuously depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), file, with unclean hands, a sham Notice of Hearing for November 8, 2012 at 10:30 a.m. on LKLS+G’s sham Motion to Withdraw as Counsel of Defendants, Miami River Park Marina, Inc, Brickell Village One, LLC & 2147 SW 8 Street, LLC (“**LKLS+G’s Sham Motion to Withdraw**”), after fraudulently representing Tavares’ Companies Defendants Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”) (collectively “Tavares’ Companies”) for sixteen (16) months after LKLS+G is fired by client Tavares for massive frauds. At all relevant times, Lehman and LKLS+G, Tavares’ former personal and Tavares’ Companies’ attorneys, are secretly conspiring to deprive and extort Tavares of properties and rights in the sham BRIDGELOAN Case. Upon the successful extortion of Tavares’ Properties, valued over \$50 million dollars, in a **sham staged unnoticed and invalid Trial of April 8, 2011**, as Tavares starts uncovering the scheme, Tavares fires Lehman and LKLS+G in April 2011, and files the first Florida Bar Complaint No. 2011-71,184(III). Despite being fired, shameless criminals Lehman and LKLS+G continue in an unauthorized and fraudulent representation to prevent justice and cover up. LKLS+G’s Sham Notice is to, *inter alia*, show to Associates of BRIDGELOAN’s CCE, LKLS+G’s continued commitment to the scheme – the CCE’s **Omertà Code**, and make sure that all Perpetrators continue the extortion. At all relevant times, all partners of LKLS+G know, and had to know that, they are extorting Tavares. At all relevant times, Lehman and LKLS+G are criminals using their Florida Bar licenses to extort client Tavares of properties and rights.

COUNTS

Count 810 - 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 18 U.S.C. §371.

Count 811 - 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 812 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 813 - 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 mail and wire to further the schemes, in violation of 18 U.S.C. §1346.

Count 814 – Shameless criminals Thomas Ralph Lehman (“Lehman”) (trl@lklsg.com) Patrick J. Rengstl (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), at 201 South Biscayne Boulevard, 22nd Floor, Miami, Florida 33131 – Tel. (305) 403-8788 & Fax: (305) 403-8789, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, certain Mail with a certain sham **Notice of Hearing on LKLS+G’s Sham Motion to Withdraw** (LKLS+G Doc. #GE2114), signed and dated on October 26, 2012, and to further the scheme upon the courts extorting Charles Tavares of properties and rights, LKLS+G’s transmits Via U.S. Postal Mail, stating, *inter alia*, “*Certificate of Service – I Hereby Certify that a true and correct copy of the foregoing was sent via email and Regular U.S. Mail on October 26, 2012 to: (814a) To: “Matthew P. Leto, Esq. alamb@hlhlawfirm.com, Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133”; (814b) To: “Richard A. Morgan, Esq. (richard.morgan@bipc.com) and (814c) James Doddo, Esq. (james.doddo@bipc.com), Buchanan Ingersoll & Rooney, P.C., Miami Tower, 100 SE Second Street, Miami, Florida 33131”To (814d) “Erica L. English, Esq. ele@katzbarron.com, Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133”; (814e) To: “Jorge L. Fors, Esq. jfors@forslegal.com, Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134”; and, (814f) To Larry A. Stumpf, Esq. (lstumpf@royblack.com) Black Srebnick Kornspan et al., 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131-4311”*, in violation of, 18, U.S.C.,§ 1341.

Count 815 – Shameless criminals Thomas Ralph Lehman (“Lehman”) (trl@lklsg.com) Patrick J. Rengstl (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), at 201 South Biscayne Boulevard, 22nd Floor, Miami, Florida 33131 – Tel. (305) 403-8788 & Fax: (305) 403-8789, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, certain E-mail with a certain sham **Notice of Hearing on LKLS+G’s Sham Motion to Withdraw** (LKLS+G Doc. #GE2114), signed and dated on October 26, 2012, and to further the scheme upon the courts extorting Charles Tavares of properties and rights, LKLS+G’s transmits Via Electronic Mail, stating, *inter alia*, “*Certificate of Service – I Hereby Certify that a true and correct copy of the foregoing was sent via email and Regular U.S. Mail on October 26, 2012 to: (815a) To: “Matthew P. Leto, Esq. alamb@hlhlawfirm.com, Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133”; (815b) To: “Richard A. Morgan, Esq. (richard.morgan@bipc.com) and (815c) James Doddo, Esq. (james.doddo@bipc.com), Buchanan Ingersoll & Rooney, P.C., Miami Tower, 100 SE Second Street, Miami, Florida 33131”To (815d) “Erica L. English, Esq. ele@katzbarron.com, Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133”; (815e) To: “Jorge L. Fors, Esq. jfors@forslegal.com, Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134”; and, (815f) To Larry A. Stumpf, Esq. (lstumpf@royblack.com) Black Srebnick Kornspan et al., 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131-4311”* , in violation of, 18, U.S.C.,§ 1343.

Count 816 - At all times relevant, shameless criminals Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), 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, 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 817 – Shameless criminals Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other 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 client Charles Tavares (“Tavares”) to further a scheme upon the Miami Courts, and falsely and fraudulently representing Tavares’ Companies Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (“Tavares’ Companies”) for sixteen (16) months after being fired by Tavares in April 2011, and after two (02) Florida Bar Complaints, to knowingly and intentionally continue depriving and extorting, under color of law, Tavares of properties and rights, preventing justice, and covering up the brazen scheme up Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

818	October 28, 2012	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Matthew Paul Leto Andrew Clifford Hall Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. The Continued Criminal Enterprise
819		§ 241 Conspiracy Against Rights &	
820		§ 242 Deprivation Rights Under Color of Law &	
821		§ 1346 Scheme/Artifice to Defraud &	
822		§ 1951 Extortion (Hobbs Act) &	
823		§ 1961 <i>et seq.</i> – RICO &	
824		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On October 28, 2012, shameless attorneys Matthew P. Leto (“Leto”) (Florida Bar No. 14.504), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, make a second set of calls continuing to coerce, threaten, intimidate, and extort Tavares’ attorneys Richard A. Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), and Carl T. Williams (“Williams”) (Florida Bar No. 529.990), at [Buchanan Ingersoll & Rooney, P.C.](#) (“Buchanan Ingersoll”) (“**Leto & Hall’s Calls 10-25-2012 to Extort Tavares’ Attorneys**”), after Buchanan Ingersoll files, on October 24, 2012, a [Notice of Hearing](#) for November 15, 2012 at 10:30 a.m. (“Notice Hearing to Reopen Case”), on Tavares’ [Motion to Reopen the Case](#) due to massive frauds upon the court by officers of the court, together with Bridgeloan Investors, Inc.’s Transnational Criminal Enterprise²³⁵ (“BRIDGELoAN”), successfully, under color of law, depriving and extorting Tavares of more than \$50 million dollars in properties and rights upon sham proceedings. The Perpetrators, in reckless disregard for the law and rights, after successfully extorting Buchanan Ingersoll, order Buchanan Ingersoll to withdraw Tavares’ Motion to Reopen the Case, cancel the Hearing to Reopen the Case, and follow a scheme, using their recommended attorney Robert M. Graff (“Graff”) (Florida Bar No. 121.193), to suit Tavares’ former attorneys at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”) for legal malpractice, that would have BRIDGELoAN financing a settlement between Tavares and BRIDGELoAN to, *inter alia*, cover up the brazen schemes. The Record displayed shows the successful intimidation, coercion and extortion of Tavares’ attorneys at Buchanan Ingersoll, failing to protect client Tavares and the rule of law.

²³⁵ BRIDGELoAN is an entity used by Joseph Horn’s (“Horn”) Continued Transnational Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that have hijacked BANIF.

COUNTS

Count 818 - 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 819 - 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 820 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 821 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 822 - Matthew Paul Leto ("Leto") (Florida Bar No. 14.504), Andrew Clifford Hall ("Andy Hall"), Hall Lamb and Hall, P.A. ("Hall & Lamb"), and other Perpetrators implicated, Associated with BRIDGELOAN's CCE, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically coerce, threaten, intimidate, and extort Charles Tavares ("Tavares"), and Tavares' attorneys, *inter alia*, Richard Allen Morgan ("Morgan"), (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), and Carl Tucker Williams ("Williams") (Florida Bar No. 529.990), of properties and rights, in order to further a continuous scheme depriving stealing, and extorting his properties, 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 823 - At all times relevant, Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 824 - Matthew Paul Leto, Andrew Clifford Hall, Hall Lamb and Hall, P.A., 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 and client Charles Tavares of properties and rights by systematically and repeatedly, under color of law, using artifices to defraud, fabricating and filing false, invalid, and fraudulent sham pleadings and Affidavits as part of an underlying scheme to deprive and extort Charles Tavares of properties and rights upon a court of law, subverting the judicial machinery to further brazen schemes upon the Miami Courts, further depriving the State of Florida of honest services, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

825	October 31, 2012 at 2:40 p.m.	<u>U. S. CODE TITLE 18</u>	Richard Allen Morgan James Doddo Carl Tucker Williams Buchanan Ingersoll & Rooney, PC The Continued Criminal Enterprise
826		§ 371 Conspiracy to Defraud the USA &	
827		§ 241 Conspiracy Against Rights &	
828		§ 242 Deprivation Rights Under Color of Law &	
829		§ 1346 Scheme/Artifice to Defraud &	
830		§ 1951 Extortion (Hobbs Act) &	
831		§ 1961 <i>et seq.</i> – RICO & <u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On October 31, 2012, a [meeting](#) between client Charles Tavares (“Tavares”) and Tavares’ attorneys Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), and Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990) at [Buchanan Ingersoll & Rooney, P.C.’s](#) is held at the Conference Room at Miami Tower, 100 S.E. Second Street, Suite 3500, Miami, Florida 33131-2148 (“Buchanan Ingersoll”). Among the main topics, is the styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), and Related Cases²³⁶ Buchanan Ingersoll is representing Tavares. After discussing the sham Related Cases, Buchanan Ingersoll’s leading attorney and managing partner Morgan²³⁷ discloses to client Tavares that Morgan and Doddo received, after filing Tavares’ Motion to Reopen the Case, on October 19, 2012, and a Notice of Hearing on the Motion to Reopen the Case, set to be heard on November 15, 2012, threatening calls from BRIDGELOAN’s CCE’s attorneys Matthew P. Leto (“Leto”) (Florida Bar No. 14.504), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), and that they had capitulated to the threats and coercion, and would not continue to pursue Tavares’ meritorious cause, showing massive frauds upon the courts, by officers of the court, successfully depriving and extorting, under color of law, Tavares of more than \$50 million dollars in properties and rights. To Tavares shock, Morgan discloses that Leto and Andy Hall further orders Buchanan Ingersoll to follow a scheme to engage attorney Robert M. Graff (“Graff”) (Florida Bar No. 121.193), to suit Tavares’ former attorneys at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”) for legal malpractice, and that BRIDGELOAN’s CCE would finance a settlement in the sham proposed case. Morgan, then calls Graff, following the scheme. Buchanan Ingersoll willfully deprives and extorts Tavares of rights and properties, further charging client Tavares for the scheme.

²³⁶ See, the Sham *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No. 2011-29624-CA-30 (“Sham BCP & Car Wash”), and the Double-Jeopardy Sham *Geania Alves Fraga v. Charles Tavares*, Case No. 2012-24483-FC-04 (“Sham Double-Jeopardy Fraga II”), by Bridgeloan Investors, Inc.’s Continued Transnational Criminal Enterprise (“CCE” “Criminal Enterprise”) to deprive, extort, falsely incriminate, destroy, prevent justice, and cover up the CCE’s schemes.

²³⁷ On November 6, 2012, Buchanan Ingersoll’s transmits an E-mail, with a [sham Invoice No.10509572](#), for BRIDGELOAN’s Case (#0081209-000001), **for month of October 2012, charging victim Tavares \$9,100.20 for being extorted by Buchanan Ingersoll.**

COUNTS

Count 825 - 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 826 - 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 827 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 828 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 829 - Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), and Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990) at [Buchanan Ingersoll & Rooney, P.C.](#), and other Perpetrators implicated, Associated with BRIDGELoan’s CCE, 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 his properties, 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 830 - At all times relevant, Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), and Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990) at [Buchanan Ingersoll & Rooney, P.C.](#), 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 831 - Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), and Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990) at [Buchanan Ingersoll & Rooney, P.C.](#), and other Perpetrators implicated, knowingly and intentionally, after being successfully threatened, intimidated, and coerced by Bridgeloan Investors, Inc. (“BRIDGELOAN’s CCE”), and BRIDGELOAN’s CCE’s attorneys Matthew P. Leto (“Leto”) (Florida Bar No. 14.504), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen and client Charles Tavares (“Tavares”) of properties and rights, in the styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), by systematically and repeatedly, under color of law, using artifices to defraud, *inter alia*, following orders from opposing party BRIDGELOAN and attorneys Hall & Lamb, falsely and fraudulently withdrawing Tavares’ Motion to Reopen the BRIDGELOAN Case, and cancelling a Hearing of November 15, 2012 on the Motion to Reopen the Case, and further following a scheme to engage attorney Robert M. Graff (“Graff”) (Florida Bar No. 121.193), to file a sham suit on behalf of Tavares against Tavares’ former attorneys at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and fraudulently staying in the case to cover up the scheme, charging client and victim Tavares for sham legal fees to deprive and extort Tavares, and further defrauding the State of Florida of honest services upon courts of law in Florida, in violation of, §817.155, F.S. (Fraudulent Practices). See [Tavares’ Contemporaneous Note](#) of Meeting of October 31, 2012 and [Buchanan Ingersoll’s Sham Bill](#) for Month of October 2012.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

832	November 6, 2012	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Richard Allen Morgan James Doddo Carl Tucker Wiliams Buchanan Ingersoll & Rooney, PC The Continued Criminal Enterprise
833		§ 241 Conspiracy Against Rights &	
834		§ 242 Deprivation Rights Under Color of Law &	
835		§ 1346 Scheme/Artifice to Defraud &	
836		§ 1343 Wire Fraud &	
837		§ 1961 <i>et seq.</i> – RICO &	
		<u>FLORIDA STATUTES</u>	
838		Title XLVI § 817.155 Fraudulent Practices	

On November 6, 2012, Charles Tavares' ("Tavares") attorneys Richard Allen Morgan ("Morgan") (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), and Carl T. Williams ("Wiliams") (Florida Bar No. 529.990), at [Buchanan Ingersoll & Rooney, P.C.'s](#) ("Buchanan Ingersoll"), transmits, via e-mail, a sham bill for legal fees for Tavares in the styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELOAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), see [Buchanan Ingersoll's Invoice No. 10509572](#), for the month of October 2012, in the amount of \$9,100.20 ("**Buchanan Ingersoll's Sham Bill**"). Among other sham charges, Buchanan Ingersoll charges client Tavares for conspiring with Bridgeloan Investors, Inc.'s ("BRIDGELOAN Criminal Enterprise" or "CCE") opposing counsels Andrew Clifford Hall ("Andy Hall"), and Matthew P. Leto ("Leto"), at Hall Lamb and Hall, P.A. ("Hall & Lamb"), agreeing, after being intimidated, threatened, and coerced, to fraudulently withdraw Tavares' Motion to Reopen the Case due to massive frauds upon the courts by officers of the courts, depriving and extorting Tavares of more than \$50 million dollars in properties and rights, under color of law, and cancelling the set Hearing on November 15, 2012 on the Motion to Reopen the Case, then, following orders from Hall & Lamb to pursuit, on behalf of client Tavares, a sham legal malpractice by Tavares against Tavares' former attorneys Thomas Ralph Lehman ("Lehman"), Patrick J. Rengstl ("Rengstl"), and Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G") for legal malpractice, using Hall & Lamb's recommended attorney Robert M. Graff ("Graff") (Florida Bar No. 121.193), in which BRIDGELOAN'S CCE would also finance a sham settlement to prevent justice and silence Tavares. Buchanan Ingersoll, in reckless disregard for client Tavares' rights, for the rule of law, and common decency, intentionally and knowingly, chose to be intimidated and coerced, further willfully depriving and extorting Tavares of properties and rights to further BRIDGELOAN's CCE underlying schemes, causing Tavares irreparable damages. Adding insult to injury, Buchanan Ingersoll shamelessly charges client Tavares to be deprived and extorted by Buchanan Ingersoll. Buchanan Ingersoll, at all relevant times knew that they are knowingly and intentionally depriving and extorting Tavares of properties and rights and proceed following opposing counsels' orders. Upon Tavares notifying Buchanan Ingersoll's executives, *inter alia*, CEO & Chairman John A. Barbour ("Jack Barbour") (john.barbour@bipc.com), Tavares' attorneys leave Buchanan Ingersoll, and the firm chooses omission.

COUNTS

Count 832 - 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 833 - 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 834 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 835 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 836 - Richard Allen Morgan ("Morgan") (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), Carl Tucker Williams ("Williams") (Florida Bar No. 529.990), and [Buchanan Ingersoll & Rooney, P.C.](#), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme coercing, intimidating, depriving, and extorting Charles Tavares ("Tavares") of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, certain E-mail with a certain sham [Invoice No. 10509572 of November 6, 2012](#), fraudulently charging client Tavares \$9,100.20 – for a total of over \$100,000 for sham legal services, conspiring, jointly and together, with opposing parties to deprive and extort Tavares, furthering BRIDGELOAN'S CCE underlying scheme upon the courts extorting Tavares of \$50 million dollars in properties and rights, transmitting the E-mail To: (836a) Charles Tavares (ctavares@bellsouth.net), at 444 Brickell Avenue, Suite 720, Miami, Florida 33131, to further the scheme, in violation of Title 18, U.S.C., §1343.

Count 837 - At all times relevant, Richard Allen Morgan ("Morgan") (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), Carl Tucker Williams ("Williams") (Florida Bar No. 529.990), and [Buchanan Ingersoll & Rooney, P.C.](#), 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 838 - Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990), and [Buchanan Ingersoll & Rooney, P.C.](#), and other Perpetrators implicated, knowingly and intentionally, after being successfully threatened, intimidated, and coerced by Bridgeloan Investors, Inc. (“Criminal Enterprise” or “CCE”), and BRIDGELOAN’s CCE’s attorneys Matthew P. Leto (“Leto”) (Florida Bar No. 14.504), and Andrew C. Hall (“Andy Hall”), at Hall Lamb and Hall, P.A. (“Hall & Lamb”), systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort U.S. citizen and client Charles Tavares (“Tavares”) of properties and rights, in the styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), by systematically and repeatedly, under color of law, using artifices to defraud, *inter alia*, following orders from opposing party BRIDGELOAN and attorneys Hall & Lamb, falsely and fraudulently withdrawing Tavares’ Motion to Reopen the BRIDGELOAN Case, and cancelling a Hearing of November 15, 2012 on the Motion to Reopen the Case, and further following a scheme to engage attorney Robert M. Graff (“Graff”) (Florida Bar No. 121.193), to file a sham suit on behalf of Tavares against Tavares’ former attorneys at Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and fraudulently staying in the case to cover up the scheme, charging client and victim Tavares \$9,100.20 for sham legal fees for the month of October 2012, see Buchanan Ingersoll’s Invoice No. 10509572, for October 2012 – for a total of over \$100,000 for sham legal services, conspiring, jointly and together, to deprive and extort Tavares, and further defrauding the State of Florida of honest services upon courts of law in Florida, in violation of, §817.155, F.S. (Fraudulent Practices). See [Tavares’ Contemporaneous Note](#) of Meeting of October 31, 2012 and [Buchanan Ingersoll’s Sham Bill](#) for Month of October 2012.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

839	November 8, 2012	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Allan Lester Langer Miami Courts The Continued Criminal Enterprise
840		§ 241 Conspiracy Against Rights &	
841		§ 242 Deprivation Rights Under Color of Law &	
842		§ 1346 Scheme/Artifice to Defraud &	
843		§ 1961 <i>et seq.</i> – RICO &	
844		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On November 8, 2012, shameless corrupt Judge Allan Lester Langer (“Judge Langer”)(Florida Bar No. 137.828) in reckless disregard for the record displayed, to further a brazen criminal scheme extorting U.S. citizen Charles Tavares (“Tavares”), in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud, by officers²³⁸ of the courts, enters, with unclean hands, a sham [Order Granting Levine Kellogg Lehman Schneider + Grossman, LLP](#) (“LKLS+G”) withdraw (“**Sham Order for LKLS+G to Withdraw**”), from, *inter alia*, falsely, invalidly, and fraudulently²³⁹ representing Tavares Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”). At all relevant times, shameless corrupt Judge Langer is conspiring, jointly and together with Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”), and CCE’s Associates, knowingly and intentionally, systematically coercing, intimidating, threatening, depriving, and extorting victim Tavares of properties and rights, under color law, upon subverted proceedings. The Perpetrators all know in truth and in fact that, LKLS+G’s withdraw follows sixteen (16) months of continued unauthorized and fraudulent representation of Tavares’ Companies Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (“Tavares’ Companies”), to continue depriving, extorting, and preventing justice to cover up the brazen scheme upon the Miami Courts by officers of the court.

²³⁸ Among other Perpetrators Implicated, Matthew Paul Leto (“Leto”) Andrew Clifford Hall (“Andy Hall”), Hall Lamb and Hall, P.A. (“Hall & Lamb”), Larry Allen Stumpf (“Stumpf”), Jared Michael Lopez (“Lopez”), Black & Srebnick, P.A., Erica Lee English (“English”), Harold Eugene Lindsey III (“Lindsey III”), and Tavares’ former personal and corporate attorneys Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”).

²³⁹ Since April 2011, Tavares fired Tavares’ personal and corporate attorneys Thomas Ralph Lehman (“Lehman”) (Florida Bar No. 351.318), Patrick J. Rengstl (“Rengstl”) (Florida Bar No. 581.631), and LKLS+G, that, together with BRIDGELoAN’s CCE and opposing parties, perpetrated massive frauds depriving and extorting Tavares of more than \$50 million dollars in the sham BRIDGELoAN Case, and filed two (02) Florida Bar Complaints against his reckless attorneys LKLS+G. Despite being fired, and having two (02) Florida Bar Complaints for frauds against client Tavares, shameless attorneys LKLS+G’s continue for sixteen (16) months in an unauthorized and fraudulent representation of Tavares’ Companies to, *inter alia*, prevent justice and cover up.

COUNTS

Count 839 - 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 840 - 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 841 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 842 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 843 - At all times relevant, corrupt Judge Allan Lester Langer (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 844 - Corrupt Judge Allan Lester Langer (Florida Bar No. 137.828), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("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 and client Charles Tavares ("Tavares") of properties and rights by systematically and repeatedly, under color of law, knowingly and intentionally, allowing the subversion of Miami Courts, and, *inter alia*, allowing sham and contradictory pleadings, presiding sham hearings and a patently staged unnoticed and invalid "**Trial of April 8, 211**" to enter sham Final Judgments, and entering a Sham Order Granting attorneys Levine Kellogg Lehman Schneider + Grossman, LLP withdraw from a known false and fraudulent representation of Tavares' Companies Defendants Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. ("Tavares' Companies") for over sixteen (16) months, to willfully further a brazen underlying criminal scheme to deprive and extort Tavares of properties and rights upon a court of law, subverting the judicial machinery, further depriving the State of Florida of honest services upon courts of law in Florida, in violation of, §817.155, F.S. (Fraudulent Practices).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
845	November 13, 2012	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Thomas Ralph Lehman Patrick J. Rengstl Elsa S. Fresco Carol A. Greco Stuart I. Grossman Lawrence A. Kellogg David M. Levine Jeffrey C. Schneider LKLS+G, LLP The Continued Criminal Enterprise
846		§ 241 Conspiracy Against Rights &	
847		§ 242 Deprivation Rights Under Color of Law &	
848		§ 1346 Scheme/Artifice to Defraud &	
849		§ 1341 Mail Fraud &	
850		§ 1343 Wire Fraud &	
851		§ 1961 <i>et seq.</i> – RICO &	
852		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

On November 13, 2012, criminals and reckless attorneys Thomas R. Lehman (“Lehman”) (Florida Bar No. 351.318), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), Associates of Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Criminal Enterprise,²⁴⁰ to further a brazen scheme, systematically and continuously depriving and extorting U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law, in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [Eleventh Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), file, with unclean hands, a [sham Certificate of Service](#) with a copy of an Order Authorizing LKLS+G, LLP to Withdraw (“**LKLS+G Sham Withdraw Order**”), fraudulently representing Tavares’ Companies Defendants Brickell Village One, LLC (“BV One”), 2147 SW 8 Street, LLC (“2147”), and Miami River Park Marina, Inc. (“MRPM”) (collectively “Tavares’ Companies”). At all relevant times, Lehman and LKLS+G, Tavares’ former personal and Tavares’ Companies’ attorneys, are secretly conspiring to deprive and extort Tavares of properties and rights in the sham BRIDGELoAN Case. Upon the successful extortion of Tavares’ Properties, valued over \$50 million dollars, in a **sham staged unnoticed and invalid Trial of April 8, 2011**, as Tavares uncovers the scheme, Tavares fires Lehman and LKLS+G in April 2011. Despite being fired, shameless criminals Lehman and LKLS+G continue in an unauthorized and fraudulent representation for sixteen months to prevent justice and cover up. LKLS+G’s Sham Withdraw Order is entered as the Perpetrators successfully extort Tavares’ attorneys Buchanan Ingersoll & Rooney, PC (“Buchanan Ingersoll”) to cancel a hearing and withdraw a Motion to Reopen the Case due to frauds, further depriving and extorting Tavares, under color of law. At all relevant times, all partners of LKLS+G knew, and had to know that they are extorting Tavares.

²⁴⁰ BRIDGELoAN is an entity used by Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF.

COUNTS

Count 845 - 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 846 - 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 847 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of his properties and constitutionally guaranteed rights, under color of law, in violation of, 18 U.S.C. §242.

Count 848 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 849 – Shameless criminals Thomas Ralph Lehman (“Lehman”) (trl@lklsg.com), Patrick J. Rengstl (“Rengstl”) (pjr@lklg.com), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), at 201 South Biscayne Boulevard, 22nd Floor, Miami, Florida 33131 – Tel. (305) 403-8788 & Fax: (305) 403-8789, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, a certain Mail with a certain [LKLS+G Sham Withdraw Order](#) (LKLS+G Doc. #GF5449), signed, dated, and U.S. Postal Mailed on November 8, 2012, to further the scheme upon the courts extorting Charles Tavares of properties and rights. Lehman and LKLS+G’s [sham Designation of E-mail Addresses](#) (LKLS+G Doc. #G90317), filed with the Miami Courts on November 13, 2012, to further the scheme, stating, *inter alia*, “*Certificate of Service – I Hereby Certify that a true and correct copy of the Order Authorizing Levine Kellogg Lehman Schneider + Grossman, LLP to Withdraw as Counsel for Defendants, Miami River Park Marina, Inc., Brickell Village One, LLC and 2147 SW 8 Street, LLC was sent via email and Regular U.S. Mail on November 8, 2012 to: (849a) “Matthew P. Leto, Esq. mletto@hlhlawfirm.com, Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133”; (849b) “Richard A. Morgan, Esq. and James Doddo, Esq., (richard.Morgan@bipc.com; james.doddo@bipc.com) Buchanan Ingersoll & Rooney, P.C., Miami Tower, 100 SE Second Street, Miami, Florida 33131” (849c) “Erica L. English, Esq. ele@katzbarron.com, Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133”; (849d) To: “Jorge L. Fors, Esq. jfors@forslegal.com, Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134”; and, (849e) “Larry Stumpf, Esq. (lstumpf@royblack.com) Black Srebnick Kornspan et al., 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131-4311”, in violation of, Title 18, U.S.C., § 1341.*

Count 850 – Shameless criminals Thomas Ralph Lehman (“Lehman”) (trl@lklsg.com), Patrick J. Rengstl (“Rengstl”) (pjr@lklg.com), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), at 201 South Biscayne Boulevard, 22nd Floor, Miami, Florida 33131 – Tel. (305) 403-8788 & Fax: (305) 403-8789, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing and extorting Charles Tavares of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, certain Electronic Mail, on November 8, 2012, with a certain [LKLS+G Sham Withdraw Order](#) (LKLS+G Doc. #GF5449), signed and dated on November 8, 2012, to further the scheme upon the courts extorting Charles Tavares of properties and rights. Lehman and LKLS+G’s [sham Designation of E-mail Addresses](#) (LKLS+G Doc. #G90317), filed with the Miami Courts on November 13, 2012, to further the scheme, is electronically transmitted, stating, *inter alia*, “*Certificate of Service – I Hereby Certify that a true and correct copy of the Order Authorizing Levine Kellogg Lehman Schneider + Grossman, LLP to Withdraw as Counsel for Defendants, Miami River Park Marina, Inc., Brickell Village One, LLC and 2147 SW 8 Street, LLC was sent via email and Regular U.S. Mail on November 8, 2012 to: (850a) “Matthew P. Leto, Esq. mletto@hlhlawfirm.com, Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133”; (850b) “Richard A. Morgan, Esq. and James Doddo, Esq., (richard.Morgan@bipc.com; james.doddo@bipc.com) Buchanan Ingersoll & Rooney, P.C., Miami Tower, 100 SE Second Street, Miami, Florida 33131” (850c) “Erica L. English, Esq. ele@katzbarron.com, Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133”; (850d) To: “Jorge L. Fors, Esq. jfors@forslegal.com, Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134”*, in violation of, Title 18, U.S.C., § 1343.

Count 851 - At all times relevant, shameless criminals Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), 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, 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 852 – Shameless criminals Thomas Ralph Lehman (“Lehman”), Patrick J. Rengstl (“Rengstl”), and Levine Kellogg Lehman Schneider + Grossman, LLP (“LKLS+G”), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, using artifices intimidating, coercing, and extorting client 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
853	November 13, 2012 at 3:35 P.M.	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Richard Allen Morgan James Doddo Carl Tucker Williams Buchanan Ingersoll & Rooney, PC The Continued Criminal Enterprise
854		§ 241 Conspiracy Against Rights &	
855		§ 242 Deprivation Rights Under Color of Law &	
856		§ 1346 Scheme/Artifice to Defraud &	
857		§ 1341 Mail Fraud &	
858		§ 1343 Wire Fraud &	
859		§ 1961 <i>et seq.</i> – RICO &	
860		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

On November 13, 2012, Charles Tavares' ("Tavares") attorneys Richard Allen Morgan ("Morgan") (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), and Carl T. Williams ("Williams") (Florida Bar No. 529.990), at [Buchanan Ingersoll & Rooney, P.C.'s](#) ("Buchanan Ingersoll"), transmits, file, with unclean hands, [Defendants' Notice of Withdrawal of Motion to Reopen Case \("Sham Withdraw Motion to Reopen Case"\)](#) in the styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELOAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), vitiated by fraud by officers of the court, systematically depriving and extorting Tavares, under color of law, of properties and rights. Buchanan Ingersoll files the sham Withdraw Motion to Reopen after being threatened, intimidated, coerced, and extorted by Bridgeloan Investors, Inc.'s²⁴¹ ("BRIDGELOAN") reckless attorneys Matthew P. Leto ("Leto") and Andrew Clifford Hall ("Andy Hall") at Hall Lamb and Hall, P.A. ("Hall & Lamb"), on October 25 & 28, 2012, to withdraw, and to follow a sham scheme to suit Tavares' former attorneys Levine Kellogg Lehman Schneider + Grossman, LLP ("LKLS+G") for legal malpractice, that would have BRIDGELOAN financing a sham settlement to cover up the underlying scheme in the BRIDGELOAN Case depriving and extorting Tavares of more than \$50 million dollars in properties, in Final Judgments, predicated on a false, invalid, and fraudulent settlement fabricated by officers of the courts, and entered by corrupt Judge Allan Lester Langer ("Judge Langer"), in a staged sham unnoticed and invalid "*Trial*" of April 8, 2011. Since then, at all relevant times, Buchanan Ingersoll's attorneys, shareholders, and executives, *inter alia*, CEO & Chairman John A. Barbour ("Jack Barbour") (john.barbour@bipc.com), were made aware of Buchanan Ingersoll's betrayal and extortion of client Tavares to further the brazen scheme, and willfully chose omission.

²⁴¹ BRIDGELOAN is an entity used by Joseph Horn's ("Horn") Transnational Continued Criminal Enterprise ("CCE" "Criminal Enterprise") specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities' fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank's ("BANIF") corrupt executives and attorneys that hijacked BANIF.

COUNTS

Count 853 - 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 854 - 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 855 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 856 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 857 - Richard Allen Morgan ("Morgan") (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), Carl Tucker Williams ("Williams") (Florida Bar No. 529.990), and [Buchanan Ingersoll & Rooney, P.C.](#), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme coercing, intimidating, depriving, and extorting Charles Tavares ("Tavares") of properties and rights, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, transmitting, on November 13, 2012, Via U.S Postal Mail, Facsimile, and E-mail, a certain sham [Defendants' Notice of Withdrawal of Motion to Reopen the Case](#) (Buchanan Ingersoll's Doc. #388133v1;MIA2_General), furthering BRIDGELoan'S CCE underlying scheme upon the courts to: **(857a)** "Matthew P. Leto, Esq., Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133"; **(857b)** "Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP, Miami, Florida 33131"; **(857c)** "Erica L. English, Esq., Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133"; **(857d) To:** "Jorge L. Fors, Esq. jfors@forslegal.com, Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134"; and, **(858e)** "Larry Stumpf, Esq. (lstumpf@royblack.com) Black Srebnick Kornspan et al., 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131-4311", in violation of, Title 18, U.S.C., § 1341.

Count 858 - Richard Allen Morgan ("Morgan") (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), Carl Tucker Williams ("Williams") (Florida Bar No. 529.990), and [Buchanan Ingersoll & Rooney, P.C.](#), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme coercing, intimidating, depriving, and extorting Charles Tavares ("Tavares") of properties and rights, under color of law, in subverted proceedings upon Miami Courts,

to wit – among others, transmitting, on November 13, 2012 at 5:44 P.M., Via U.S Postal Mail, [Facsimile, and E-mail](#), a certain sham [Defendants’ Notice of Withdrawal of Motion to Reopen the Case](#) (Buchanan Ingersoll’s Doc. #388133v1;MIA2_General) (Facsimile Record #370150-v1 by Soraya Hamilton), furthering BRIDGELoan’S CCE underlying scheme upon the courts to: **(858a)** “*Matthew P. Leto, Esq., Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133 (Facsimile 305-374-5033)*”; **(858b)** “*Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP, Miami, Florida 33131(Facsimile 305-403-8789)*”; **(858c)** “*Erica L. English, Esq., Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133 (Facsimile 305-285-9227)*”; **(858d)** To: “*Jorge L. Fors, Esq. jfors@forslegal.com, Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134 (Facsimile 305-446-1898)*”; and, **(858e)** “*Larry Stumpf, Esq. (lstumpf@royblack.com) Black Srebnick Kornspan et al., 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131-4311 (Facsimile 305-371-6322)*”, in violation of, Title 18, U.S.C., § 1343.

Count 859 - At all times relevant, Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990), and [Buchanan Ingersoll & Rooney, P.C.](#), 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, acts involving theft, 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 860 – At all times relevant, Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990), and [Buchanan Ingersoll & Rooney, P.C.](#), and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, falsely charging client Tavares thousands of dollars in sham legal fees, using artifices intimidating, coercing, and extorting client 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
861	December 18, 2012	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Finlay B. Matheson Nancy Stoner South Fork Parcel 1, LLC
862		§ 241 Conspiracy Against Rights &	Joseph Horn Ralph Horn
863		§ 1346 Scheme/Artifice to Defraud &	Ricardo Eichenwald Fernando Braghin
864		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	Daniel Ades Nelson Slosbergas NS Corporate Services, Inc.
865		§ 1956 Laundering of Monetary Instruments &	Bridgeloan Investors, Inc. Carlos Eduardo Pais e Jorge
866		§ 1343 Electronic Wire Fraud &	Raul Marques BANIF Securities Holdings, Ltd (KY)
867		§ 1961 <i>et seq.</i> – RICO &	Marco Antonio de Souza Pedro Serzedelo
868		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	BANIF Miami River, LLC The Continued Criminal Enterprise

On December 18, 2012, in furtherance of an ongoing and continued criminal scheme by Bridgeloan Investors, Inc.'s ("BRIDGELoAN") Transnational Continued Criminal Enterprise²⁴² ("Criminal Enterprise" or "CCE"), together with other Perpetrators implicated, continuously depriving and extorting U.S. citizen and victim Charles Tavares ("Tavares") of properties and rights, under color of law, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), fraudulently and invalidly transfers two Parcels ("**Sham Transfer Parcel 1**") of Tavares' 9 Acres Miami River Marina Property ("Tavares' Property") owned²⁴³ by Tavares' Company Miami River Park Marina, Inc. ("MRPM"). The Sham Transfer Parcel 1²⁴⁴ is from RIVBRIX to Finlay B. Matheson's South Fork Parcel 1, a Florida L.L.C. (collectively "Finlay Matheson") to, *inter alia*, money launder the proceeds.

²⁴² RIVBRIX, LLC, a Florida L.L.C. ("RIVBRIX"), is an entity used to money launder and tax defraud by BRIDGELoAN's CCE, led by Joseph Horn ("Horn"), Ralph Horn ("Horn"), Ricardo Eichenwald ("Eichenwald"), Fernando Braghin ("Braghin"), Daniel Ades ("Ades"), and Nelson Slosbergas, together with Associate BANIF Securities Holdings, Ltd., a Cayman Islands company and BANIF Miami River, LLC, a Florida L.L.C. (collectively "BANIF"), led by, *inter alia*, Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge ("Carlos Pais Jorge"), Raul Marques ("Marques"), Marco Antonio de Souza ("De Souza"), and Pedro Serzedelo ("Serzedelo").

²⁴³ On April 8, 2011, BRIDGELoAN's CCE, with corrupt officers of the court, stage a sham unnoticed and invalid "*Trial*", for corrupt Judge Allan Lester Langer, to knowingly and intentionally, enter two fraudulent and invalid Final Judgments, predicated on a sham settlement, fraudulently produced by Tavares' attorneys Levine Kellogg Lehman Schneider + Grossman, LLP and Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), conspiring together with, *inter alia*, opposing counsels Hall, Lamb, Hall, P.A. (Hall & Lamb"), and Katz Barron Faust Squitiero ("Katz Barron"), fraudulently and invalidly depriving and extorting Tavares of Tavares' Property, rendering the invalid and fraudulent Final Judgements, and future transfers, forever null and void.

²⁴⁴ See CFN#2012R0912652 Deed Sham Transfer **Parcel 1** for \$1,320,000 for 123,428 SF of Riverfront property (\$10.69 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5296498), represented by Nancy Stoner ("Stoner") (Florida Bar No. 368.105).

COUNTS

Count 861 - 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 862 - 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 863 - 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 864 – At all times relevant, Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 1, LLC (“South Fork 1”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN#2012R0912652 Deed Sham Transfer Parcel 1 for \$1,320,000 for 123,428 SF of Riverfront property (\$10.69 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5296498), represented by Stoner. The record displayed shows a brazen scheme, depriving and extorting Tavares’ Miami River Marina Property, in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer (“Judge Langer”), Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez (“Lopez”), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Matthew Paul Leto (“Leto”), Hall Lamb and Hall, P.A. (“Hall & Lamb”), Erica Lee English (“English”), and Katz Barron Faust Squitiero (“Katz Barron”), and further showing the Perpetrators’ conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares’ Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares’ Properties, *inter alia*, Bridgeloan Investors, Inc. (“BRIDGELoAN”) to RIVBRIX, and the following sham transfer, forever null and void, from RIVBRIX to Finlay B. Matheson’s South Fork Parcel 1, LLC, knowingly dealing with stolen properties, in violation of, Title 18 U.S.C., § 1957.

Count 865 – At all times relevant, Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 1, LLC (“South Fork 1”), and other Perpetrators implicated, all knew, and had to know that, they were all engaging in a financial transaction representing the proceeds derived from a criminal scheme depriving, extorting, and stealing certain properties from Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina

Property”), see CFN#2012R0912652 Deed Sham Transfer Parcel 1 for \$1,320,000 for 123,428 SF of Riverfront property (\$10.69 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5296498), represented by Stoner. The record displayed shows a brazen scheme, depriving and extorting Tavares’ Miami River Marina Property in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer (“Judge Langer”), Thomas R. Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitiero, and further showing the Perpetrators’ conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares’ Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares’ Properties, *inter alia*, Bridgeloan Investors, Inc. (“BRIDGELoAN”), to RIVBRIX, and the following sham transfer from RIVBRIX to Finlay B. Matheson’s South Fork Parcel 1, LLC, knowingly dealing with stolen properties is null and void, money laundering the proceeds of the scheme, in violation of, Title 18 U.S.C. §1956 (Laundering of Monetary Instruments).

Count 866 – Finlay B. Matheson (“Matheson”), Nancy Stoner, South Fork Parcel 1, LLC, RIVBRIX, LLC, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting Charles Tavares of properties and rights, under color of law, and further, *inter alia*, fraudulently transferring the stolen properties and money laundering the ill-gotten proceeds, Electronic Wires, in violation of, 18, U.S.C., § 1343.

Count 867 - At all times relevant, Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 1, LLC (“South Fork 1”), 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, 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 868 – Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 1, LLC (“South Fork 1”), 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
869	December 18, 2012	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Finlay B. Matheson Nancy Stoner South Fork Parcel 2, LLC
870		§ 241 Conspiracy Against Rights &	Joseph Horn Ralph Horn
871		§ 1346 Scheme/Artifice to Defraud &	Ricardo Eichenwald Fernando Braghin
872		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	Daniel Ades Nelson Slosbergas NS Corporate Services, Inc.
873		§ 1956 Laundering of Monetary Instruments &	Bridgeloan Investors, Inc. Carlos Eduardo Pais e Jorge
874		§ 1343 Electronic Wire Fraud &	Raul Marques BANIF Securities Holdings, Ltd (KY)
875		§ 1961 <i>et seq.</i> – RICO &	Marco Antonio de Souza Pedro Serzedelo
876		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	BANIF Miami River, LLC The Continued Criminal Enterprise

On December 18, 2012, in furtherance of an ongoing and continued criminal scheme by Bridgeloan Investors, Inc.'s ("BRIDGELoAN") Transnational Continued Criminal Enterprise²⁴⁵ ("Criminal Enterprise" or "CCE"), together with other Perpetrators implicated, continuously depriving and extorting U.S. citizen and victim Charles Tavares ("Tavares") of properties and rights, under color of law, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), fraudulently and invalidly transfers two Parcels ("**Sham Transfer Parcel 2**") of Tavares' 9 Acres Miami River Marina Property ("Tavares' Property") owned²⁴⁶ by Tavares' Company Miami River Park Marina, Inc. ("MRPM"). The Sham Transfer **Parcel 2**²⁴⁷ is from RIVBRIX to Finlay B. Matheson's South Fork Parcel 2, a Florida L.L.C. (collectively "Finlay Matheson") to, *inter alia*, money launder the proceeds.

²⁴⁵ RIVBRIX, LLC, a Florida L.L.C. ("RIVBRIX"), is an entity used to money launder and tax defraud by BRIDGELoAN's CCE, led by Joseph Horn ("Horn"), Ralph Horn ("Horn"), Ricardo Eichenwald ("Eichenwald"), Fernando Braghin ("Braghin"), Daniel Ades ("Ades"), and Nelson Slosbergas, together with Associate BANIF Securities Holdings, Ltd., a Cayman Islands company and BANIF Miami River, LLC, a Florida L.L.C. (collectively "BANIF"), led by, *inter alia*, Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge ("Carlos Pais Jorge"), Raul Marques ("Marques"), Marco Antonio de Souza ("De Souza"), and Pedro Serzedelo ("Serzedelo").

²⁴⁶ On April 8, 2011, BRIDGELoAN's CCE, with corrupt officers of the court, stage a sham unnoticed and invalid "*Trial*", for corrupt Judge Allan Lester Langer, to knowingly and intentionally, enter two fraudulent and invalid Final Judgments, predicated on a sham settlement, fraudulently produced by Tavares' attorneys Levine Kellogg Lehman Schneider + Grossman, LLP and Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), conspiring together with, *inter alia*, opposing counsels Hall, Lamb, Hall, P.A., and Katz Barron Faust Squitero ("Katz Barron"), fraudulently and invalidly depriving and extorting Tavares of Tavares' Property, rendering the patently invalid and fraudulent Final Judgements, and future transfers, forever null and void.

²⁴⁷ See CFN#2012R0912669 Deed Sham Transfer **Parcel 2** for \$800,000 for 96,696 SF of Riverfront property (\$11.48 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5290999), represented by Nancy Stoner ("Stoner") (Florida Bar No. 368.105).

COUNTS

Count 869 - 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 870 - 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 871 - 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 872 – At all times relevant, Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 2, LLC (“South Fork 2”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN#2012R0912669 Deed Sham Transfer **Parcel 2** for \$800,000 for 96,696 SF of Riverfront property (\$11.48 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5290999), represented by Stoner. The record displayed shows a brazen scheme, depriving and extorting Tavares’ Miami River Marina Property, in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer (“Judge Langer”), Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez (“Lopez”), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Matthew Paul Leto (“Leto”), Hall Lamb and Hall, P.A. (“Hall & Lamb”), Erica Lee English (“English”), and Katz Barron Faust Squitero (“Katz Barron”), and further showing the Perpetrators’ conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares’ Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares’ Properties, *inter alia*, Bridgeloan Investors, Inc. (“BRIDGELoAN”) to RIVBRIX, and the following sham transfer from RIVBRIX to Finlay B. Matheson’s South Fork Parcel 2, LLC, knowingly dealing with stolen properties, in violation of, Title 18 U.S.C., § 1957.

Count 873 – At all times relevant, Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 2, LLC (“South Fork 2”), and other Perpetrators implicated, all knew, and had to know that, they were all engaging in a financial transaction representing the proceeds derived from a criminal scheme depriving, extorting, and stealing certain properties from Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina

Property”), see CFN#2012R0912669 Deed Sham Transfer **Parcel 2** for \$800,000 for 96,696 SF of Riverfront property (\$11.48 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5290999), represented by Stoner. The record displayed shows a brazen scheme, depriving and extorting Tavares’ Miami River Marina Property in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer (“Judge Langer”), Thomas R. Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitero, and further showing the Perpetrators’ conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares’ Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares’ Properties, *inter alia*, Bridgeloan Investors, Inc. (“BRIDGELOAN”), to RIVBRIX, and the following sham transfer from RIVBRIX to Finlay B. Matheson’s South Fork Parcel 2, LLC, knowingly dealing with stolen properties is null and void, money laundering the proceeds of the scheme, in violation of, Title 18 U.S.C. §1956 (Laundering of Monetary Instruments).

Count 874 – Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”), South Fork Parcel 2, LLC, RIVBRIX, LLC, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting Charles Tavares of properties and rights, under color of law, and further, *inter alia*, fraudulently transferring the stolen properties and money laundering the ill-gotten proceeds, Electronic Wires, in violation of, 18, U.S.C., § 1343.

Count 875 - At all times relevant, Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 2, LLC (“South Fork 2”), 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, 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 876 – Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 2, LLC (“South Fork 2”), 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

877	December 18, 2012	U. S. CODE TITLE 18	Finlay B. Matheson
878		§ 371 Conspiracy to Defraud the USA	Nancy Stoner
879		&	South Fork Parcel 3, LLC
880		§ 241 Conspiracy Against Rights	Joseph Horn
881		&	Ralph Horn
882		§ 1346 Scheme/Artifice to Defraud	Ricardo Eichenwald
883		&	Fernando Braghin
884		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity	Daniel Ades
		§ 1956 Laundering of Monetary Instruments	Nelson Slosbergas
		&	NS Corporate Services, Inc.
		§ 1343 Electronic Wire Fraud	Bridgeloan Investors, Inc.
		&	Carlos Eduardo Pais e Jorge
		§ 1961 <i>et seq.</i> – RICO	Raul Marques
		&	BANIF Securities Holdings, Ltd (KY)
		FLORIDA STATUTES	Marco Antonio de Souza
		Title XLVI § 817.155 Fraudulent Practices	Pedro Serzedelo
			BANIF Miami River, LLC
			The Continued Criminal Enterprise

On December 18, 2012, in furtherance of an ongoing and continued criminal scheme by Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise²⁴⁸ (“Criminal Enterprise” or “CCE”), together with other Perpetrators implicated, continuously depriving and extorting U.S. citizen and victim Charles Tavares (“Tavares”) of properties and rights, under color of law, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), fraudulently and invalidly transfers two Parcels (“**Sham Transfer Parcel 3**”) of Tavares’ 9 Acres Miami River Marina Property (“Tavares’ Property”) owned²⁴⁹ by Tavares’ Company Miami River Park Marina, Inc. (“MRPM”). The Sham Transfer **Parcel 3**²⁵⁰ is from RIVBRIX to Finlay B. Matheson’s South Fork Parcel 3, a Florida L.L.C. (collectively “Finlay Matheson”) to, *inter alia*, money launder the proceeds.

²⁴⁸ RIVBRIX, LLC, a Florida L.L.C. (“RIVBRIX”), is an entity used to money launder and tax defraud by BRIDGELOAN’s CCE, led by Joseph Horn (“Horn”), Ralph Horn (“Horn”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Daniel Ades (“Ades”), and Nelson Slosbergas, together with Associate BANIF Securities Holdings, Ltd., a Cayman Islands company and BANIF Miami River, LLC, a Florida L.L.C. (collectively “BANIF”), led by, *inter alia*, Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge (“Carlos Pais Jorge”), Raul Marques (“Marques”), Marco Antonio de Souza (“De Souza”), and Pedro Serzedelo (“Serzedelo”).

²⁴⁹ On April 8, 2011, BRIDGELOAN’s CCE, with corrupt officers of the court, stage a sham unnoticed and invalid “*Trial*”, for corrupt Judge Allan Lester Langer, to knowingly and intentionally, enter two fraudulent and invalid Final Judgments, predicated on a sham settlement, fraudulently produced by Tavares’ attorneys Levine Kellogg Lehman Schneider + Grossman, LLP and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), conspiring together with, *inter alia*, opposing counsels Hall, Lamb, Hall, P.A., and Katz Barron Faust Squitero (“Katz Barron”), fraudulently and invalidly depriving and extorting Tavares of Tavares’ Property, rendering the patently invalid and fraudulent Final Judgements, and future transfers, forever null and void.

²⁵⁰ See CFN#2012R0912691 Deed Sham Transfer **Parcel 3** for \$2,880,000 for 176,287 SF of Riverfront property (\$16.33 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5327713), represented by Nancy Stoner (“Stoner”) (Florida Bar No. 368.105).

COUNTS

Count 877 - 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 878 - 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 879 - 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 880 – At all times relevant, Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 3, LLC (“South Fork 3”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN#2012R0912691 Deed Sham Transfer **Parcel 3** for \$2,880,000 for 176,287 SF of Riverfront property (\$16.33 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5327713), represented by Nancy Stoner. The record displayed shows a brazen scheme, depriving and extorting Tavares’ Miami River Marina Property, in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez (“Lopez”), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Matthew Paul Leto (“Leto”), Hall Lamb and Hall, P.A. (“Hall & Lamb”), Erica Lee English (“English”), and Katz Barron Faust Squitiero (“Katz Barron”), and further showing the Perpetrators’ conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares’ Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares’ Properties, *inter alia*, Bridgeloan Investors, Inc. (“BRIDGELoAN”), to RIVBRIX, and the following sham transfer from RIVBRIX to Finlay B. Matheson’s South Fork Parcel 3, LLC, knowingly dealing with stolen properties is null and void, and in violation of, Title 18 U.S.C., § 1957.

Count 881 – At all times relevant, Finlay B. Matheson (“Matheson”), Nancy Stoner (“Stoner”) (Florida Bar No. 368.105), South Fork Parcel 3, LLC (“South Fork 3”), and other Perpetrators implicated, all knew, and had to know that, they were all engaging in a financial transaction representing the proceeds derived from a criminal scheme depriving, extorting, and stealing certain properties from Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN#2012R0912691 Deed Sham Transfer **Parcel 3** for \$2,880,000 for 176,287 SF of

Riverfront property (\$16.33 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5327713), represented by Stoner. The record displayed shows a brazen scheme, depriving and extorting Tavares' Miami River Marina Property in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, Thomas R. Lehman ("Lehman"), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitiero, and further showing the Perpetrators' conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares' Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares' Properties, *inter alia*, Bridgeloan Investors, Inc. ("BRIDGELoAN"), to RIVBRIX, and the following sham transfer from RIVBRIX to Finlay B. Matheson's South Fork Parcel 3, LLC, knowingly dealing with stolen properties is null and void, money laundering the proceeds of the scheme, in violation of, Title 18 U.S.C. §1956 (Laundering of Monetary Instruments).

Count 882 – Finlay B. Matheson ("Matheson"), Nancy Stoner, South Fork Parcel 3, LLC, RIVBRIX, LLC, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting Charles Tavares of properties and rights, under color of law, and further, *inter alia*, fraudulently transferring the stolen properties and money laundering the ill-gotten proceeds, Electronic Wires, in violation of, 18, U.S.C., § 1343.

Count 883 - At all times relevant, Finlay B. Matheson ("Matheson"), Nancy Stoner ("Stoner") (Florida Bar No. 368.105), South Fork Parcel 3, LLC ("South Fork 3"), 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, 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 884 – Finlay B. Matheson ("Matheson"), Nancy Stoner ("Stoner") (Florida Bar No. 368.105), South Fork Parcel 3, LLC ("South Fork 3"), 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

885	December 2012	U. S. CODE TITLE 18	Allan Lester Langer Norma Shepard Lindsey Miami Courts The Continued Criminal Enterprise
886		§ 371 Conspiracy to Defraud the USA &	
887		§ 241 Conspiracy Against Rights &	
888		§ 1346 Scheme/Artifice to Defraud &	
890		§ 1961 <i>et seq.</i> – RICO &	
891		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices & FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	

In December 2012, in furtherance of an ongoing and continued criminal scheme by Bridgeloan Investors, Inc.'s²⁵¹ ("BRIDGELOAN"), together with other Perpetrators implicated, continuously depriving and extorting U.S. citizen and victim Charles Tavares ("Tavares") of properties and rights, under color of law, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELOAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), causes²⁵² Judge Norma Shepard Lindsey ("Judge Lindsey") (Florida Bar No. 994.812) to be appointed, in an intentional and known fatal conflict of interest²⁵³ to the BRIDGELOAN Case, replacing retiring corrupt Judge Allan Lester Langer ("Judge Langer") (Florida Bar No. 137.828). Judge Lindsey, showing complete allegiance to BRIDGELOAN's CCE, systematically, in all Four Related Cases, relentlessly and successfully, knowingly and intentionally, deprives and extorts, under color of law, Tavares of properties and rights, in brazen disregard for the law, rights, and the Constitution. For Judge Lindsey's reckless services to the Criminal Enterprise, Judge Lindsey is rewarded by, *inter alia*, being appointed Judge in the Third District Court of Appeal of Florida, showing that, "**Crime Pays.**" At all relevant times, corrupt Judges Langer and Lindsey, and the Miami Courts, know they are depriving and extorting Tavares of properties and rights, and depriving the United States of honest services.

²⁵¹ BRIDGELOAN is an entity used by Joseph Horn's ("Horn") Transnational Continued Criminal Enterprise ("CCE" "Criminal Enterprise") specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities' fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank's ("BANIF") corrupt executives and attorneys that hijacked BANIF.

²⁵² BRIDGELOAN's CCE surrounds the Sham Related Cases, *inter alia*, the BRIDGELOAN Case; *The Bank of New York Mellon v. Charles Tavares*, Case No. 2010-26864-CA-30 ("BNY Mellon" Case); *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No. 2011-29624-CA-30 (BCP & Car Wash" Case); and *Deutsche National Bank & Trust v. Charles Tavares*, Case No. 2012-20197-CA-30, with Associates and corrupt Judges, *inter alia*, Judges Langer and Lindsey, intentionally assigned to preside the Four Related Cases, willfully perpetrating, together with other implicated officers of the court, systematic violations of law and rights to further BRIDGELOAN's schemes.

²⁵³ Judge Lindsey is married to implicated attorney Harold Eugene Lindsey III ("Lindsey III") at Katz Barron Faust Squitero ("Katz Barron"), representing MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon ("BNY Mellon") in the BRIDGELOAN sham Case, and implicated in the massive fraudulent schemes upon the court, by officers of the court, systematically depriving and extorting Tavares of more than \$50 million dollars in properties and rights. *See Record.*

COUNTS

Count 885 - 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 886 - 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 887 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 888 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 889 - At all times relevant, shameless corrupt Judges Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), and Norma Shepard Lindsey (“Judge Lindsey”) (Florida Bar No. 994.8120, the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares (“Tavares”), and Tavares’ Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, 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 890 - Shameless corrupt Judges Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), and Norma Shepard Lindsey (“Judge Lindsey”) (Florida Bar No. 994.8120), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares (“Tavares”), and Tavares’ Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against, *inter alia*, the State of Florida, 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 Florida, and further depriving the State of Florida of honest services upon courts of law in Florida, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 891 – Shameless corrupt Judges Allan Lester Langer (“Judge Langer”) (Florida Bar No. 137.828), and Norma Shepard Lindsey (“Judge Lindsey”) (Florida Bar No. 994.8120), and other officers of the court implicated, did knowingly and intentionally, with conflict of interests, 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 U.S. Citizen Charles Tavares’ (“Tavares”) constitutionally guaranteed rights, due process, by systematically holding and presiding sham hearings, proceedings, sham trials, and entering sham invalid and fraudulent Orders 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. *See Fla. Code Jud. Conduct.*

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

892	January 28, 2013	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Richard Allen Morgan James Doddo Carl Tucker Williams Buchanan Ingersoll & Rooney, PC The Continued Criminal Enterprise
893		§ 241 Conspiracy Against Rights &	
894		§ 242 Deprivation Rights Under Color of Law &	
895		§ 1346 Scheme/Artifice to Defraud &	
896		§ 1341 Mail Fraud &	
897		§ 1343 Wire Fraud &	
898		§ 1961 <i>et seq.</i> – RICO &	
899		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	

On January 28, 2013, Charles Tavares’ (“Tavares”) corrupt²⁵⁴ attorneys Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), and Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990), at [Buchanan Ingersoll & Rooney, P.C.’s](#) (“Buchanan Ingersoll”), file, with unclean hands, a Notice of Unavailability²⁵⁵ (“**Sham Notice Unavailability**”) in the styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud by officers of the court, systematically depriving and extorting Tavares, under color of law, of properties and rights. At all relevant times, Tavares’ attorneys Buchanan Ingersoll, its shareholders, and executives, *inter alia*, CEO & Chairman John A. Barbour (“Jack Barbour”) (john.barbour@bipc.com), knew – and had to know, that they are intentionally and knowingly depriving and extorting client Tavares of properties and rights, to further BRIDGELOAN’s CCE’s criminal scheme upon Florida courts, willfully preventing justice and covering up, while falsely charging Tavares over \$100,000 for sham legal fees. Instead of following their duties to client Tavares, to the rule of law, and their oath, they knowingly and intentionally proceed to systematically deprive and extort client Tavares, causing irreparable harm.

²⁵⁴ On October 25 and 28, 2012, Tavares’ attorneys Buchanan Ingersoll are successfully threatened, coerced, and extorted by Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise’s (“Criminal Enterprise” or “CCE”) attorneys Matthew Paul Leto (“Leto”), Andrew Clifford Hall (“Andy Hall”) at Hall Lamb and Hall, P.A. (“Hall & Lamb”), to, *inter alia*, withdraw Tavares’ meritorious Motion to Reopen the Case due to frauds upon the court by officers of the court causing sham invalid Final Judgments against Tavares, entered on April 8, 2011’s sham unnoticed and invalid staged “*Trial!*” Since then, Buchanan Ingersoll intentionally and knowingly stays in the BRIDGELOAN Case to prevent justice and cover up the brazen scheme. Unknown to Tavares at the time, Tavares’ leading attorney Morgan, is a former attorney at opposing implicated firm Katz Barron. See, *e.g.*, Morgan at Katz Barron representing in [Marco Antonio de Souza v. Marcus Elias](#), Case No. 2001-006799-CA-01.

²⁵⁵ Buchanan Ingersoll’s Sham Notice of Unavailability shows its continued commitment to the scheme - “**Omertà Code,**” to the CCE and other implicated officers of the court, *inter alia*, to recently appointed Judge Norman Shepard Lindsey (“Judge Lindsey”), wife to opposing counsel Harold Eugene Lindsey III (“Lindsey III”) at Katz Barron, in the same BRIDGELOAN Case.

COUNTS

Count 892 - 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 893 - 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 894 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 895 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 896 - Richard Allen Morgan ("Morgan") (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), Carl Tucker Williams ("Williams") (Florida Bar No. 529.990), and [Buchanan Ingersoll & Rooney, P.C.](#), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a known criminal scheme coercing, intimidating, depriving, and extorting client Charles Tavares ("Tavares") of properties and rights, and preventing justice to cover up schemes, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, transmitting, on January 28, 2013, Via [U.S Postal Mail](#), Facsimile, and E-mail, a certain sham [Notice of Unavailability](#) ("**Sham Notice Unavailability**") (Buchanan Ingersoll's Doc. #394210v1), furthering BRIDGELOAN'S CCE underlying scheme upon the courts to: **(896a)** "*Matthew P. Leto, Esq., Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133*"; **(896b)** "*Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP, Miami, Florida 33131*"; **(896c)** "*Erica L. English, Esq., Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133*"; **(896d) To:** "*Jorge L. Fors, Esq. jfors@forslegal.com, Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134*"; and, **(896e)** "*Larry Stumpf, Esq. (lstumpf@royblack.com) Black Srebnick Kornspan et al., 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131-4311*", in violation of, Title 18, U.S.C., § 1341.

Count 897 - Richard Allen Morgan ("Morgan") (Florida Bar No. 836.869), James Doddo ("Doddo") (Florida Bar No. 30.242), Carl Tucker Williams ("Williams") (Florida Bar No. 529.990), and [Buchanan Ingersoll & Rooney, P.C.](#), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme coercing, intimidating, depriving, and extorting client Charles Tavares ("Tavares") of properties and rights, and preventing justice to cover up schemes, under color of

law, in subverted proceedings upon Miami Courts, to wit – among others, transmitting, on January 28, 2013, Via U.S Postal Mail, Facsimile, and E-mail, a certain sham Notice of Unavailability (“**Sham Notice Unavailability**”) (Buchanan Ingersoll’s Doc. #394210v1), furthering BRIDGELOAN’S CCE underlying scheme upon the courts to: **(897a)** “*Matthew P. Leto, Esq., Hall, Lamb, and Hall, P.A., 2665 Bayshore Drive, Penthouse 1, FL, 33133*”; **(897b)** “*Thomas R. Lehman, Esq., Levine Kellogg Lehman Schneider + Grossman, LLP, Miami, Florida 33131*”; **(897c)** “*Erica L. English, Esq., Katz Barron Squitero Faust, 2699 South Bayshore Drive, Seventh Floor, Miami, FL 33133*”; **(897d) To:** “*Jorge L. Fors, Esq. jfors@forslegal.com, Jorge L. Fors, P.A., 1108 Ponce de Leon Blvd, Coral Gables, FL, 33134*”; and, **(897e)** “*Larry Stumpf, Esq. (lstumpf@royblack.com) Black Srebnick Kornspan et al., 201 S. Biscayne Blvd., Suite 1300, Miami, Florida 33131-4311*”, in violation of, Title 18, U.S.C., § 1343.

Count 898 - At all times relevant, Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990), and Buchanan Ingersoll & Rooney, P.C., 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, conning, coercing, threatening, intimidating, depriving, and extorting client and U.S. citizen Charles Tavares, preventing justice, covering up schemes, acts involving theft, 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 899 – At all times relevant, Richard Allen Morgan (“Morgan”) (Florida Bar No. 836.869), James Doddo (“Doddo”) (Florida Bar No. 30.242), Carl Tucker Williams (“Williams”) (Florida Bar No. 529.990), and Buchanan Ingersoll & Rooney, P.C., and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts to further an underlying criminal scheme to deprive, steal and extort client Charles Tavares (“Tavares”) of properties and rights by systematically and repeatedly, under color of law, falsely charging client Tavares thousands of dollars in sham legal fees, using artifices intimidating, coercing, and extorting Tavares, and preventing justice 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
900	May 17, 2013	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Pedro Mantilla Coral Group Property Advisors, Inc Joseph Horn
901		§ 241 Conspiracy Against Rights &	Ralph Horn Ricardo Eichenwald
902		§ 1346 Scheme/Artifice to Defraud &	Fernando Braghin Daniel Ades
903		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	Renato Carvalho Bertrand Nelson Slosbergas NS Corporate Services, Inc.
904		§ 1956 Laundering of Monetary Instruments &	Bridgeloan Investors, Inc. Carlos Eduardo Pais e Jorge
905		§ 1343 Electronic Wire Fraud &	Raul Marques BANIF Securities Holdings, Ltd (KY)
906		§ 1961 <i>et seq.</i> – RICO &	Marco Antonio de Souza Pedro Serzedelo
907		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	BANIF Miami River, LLC The Continued Criminal Enterprise

On May 17, 2013, in furtherance of an ongoing and continued criminal scheme by Bridgeloan Investors, Inc.'s ("BRIDGELoAN") Transnational Continued Criminal Enterprise²⁵⁶ ("Criminal Enterprise" or "CCE"), together with other Perpetrators implicated, continuously depriving and extorting U.S. citizen and victim Charles Tavares ("Tavares") of properties and rights, under color of law, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), fraudulently and invalidly transfers a Parcel ("**Sham Transfer Parcel 4**") of Tavares' 9 Acres Miami River Marina Property ("Tavares' Property") owned²⁵⁷ by Tavares' Company Miami River Park Marina, Inc. ("MRPM"). The Sham Transfer of Parcel 4²⁵⁸ is from RIVBRIX to Pedro Mantilla's Coral Group Property Advisors, Inc., a Florida corp. ("Mantilla") to, *inter alia*, money launder the proceeds.

²⁵⁶ RIVBRIX, LLC, a Florida L.L.C. ("RIVBRIX"), is an entity used to money launder and tax defraud by BRIDGELoAN's CCE, led by Joseph Horn ("Horn"), Ralph Horn ("Horn"), Ricardo Eichenwald ("Eichenwald"), Fernando Braghin ("Braghin"), Daniel Ades ("Ades"), and Nelson Slosbergas, together with Associate BANIF Securities Holdings, Ltd., a Cayman Islands company and BANIF Miami River, LLC, a Florida L.L.C. (collectively "BANIF"), led by, *inter alia*, Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge ("Carlos Pais Jorge"), Raul Marques ("Marques"), Marco Antonio de Souza ("De Souza"), and Pedro Serzedelo ("Serzedelo").

²⁵⁷ On April 8, 2011, BRIDGELoAN's CCE, with corrupt officers of the court, stage a sham unnoticed and invalid "*Trial*", for corrupt Judge Allan Lester Langer, to knowingly and intentionally, enter two fraudulent and invalid Final Judgments, predicated on a sham settlement, fraudulently produced by Tavares' attorneys Levine Kellogg Lehman Schneider + Grossman, LLP and Black Srebnick Kornspan & Stumpf, P.A. ("Black Srebnick"), conspiring together with, *inter alia*, opposing counsels Hall, Lamb, Hall, P.A. (Hall & Lamb"), and Katz Barron Faust Squitiero ("Katz Barron"), fraudulently and invalidly depriving and extorting Tavares of Tavares' Property, rendering the invalid and fraudulent Final Judgements, and future transfers, forever null and void.

²⁵⁸ See CFN#2013R0416072 Deed Sham Transfer **Parcel 4** for \$50,000 for 10,000 SF of land (\$5.00 SF) from RIVBRIX (No Tax Id.) to Mantilla (Tax Id. #46-1968325). On September 28, 2015, Mantilla, to further the scheme, Quit Claim Parcel 4 to 2000 Coral Group, LLC, a Florida L.L.C.'s Juan Carlos Mantilla ("Mantilla 2"), and on June 30, 2021, Mantilla 2, sells Parcel 4 for \$250,000 (\$25 SF), money laundering the proceeds from Tavares' extortion, see Miami Clerk Records at CFN 2021R0510905.

COUNTS

Count 900 - 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 901 - 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 902 - 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 903 – At all times relevant, Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp. (collectively “Mantilla”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN#2013R0416072 Deed Sham Transfer Parcel 4 for \$50,000 for 10,000 SF of land (\$5.00 SF) from RIVBRIX (No Tax Id.) to Mantilla (Tax Id. #46-1968325). The record displayed shows a brazen scheme, depriving and extorting Tavares’ Miami River Marina Property, in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer (“Judge Langer”), and Thomas Ralph Lehman (“Lehman”), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez (“Lopez”), Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Matthew Paul Leto (“Leto”), Hall Lamb and Hall, P.A. (“Hall & Lamb”), Erica Lee English (“English”), and Katz Barron Faust Squitero (“Katz Barron”), and further showing the Perpetrators’ conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares’ Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares’ Properties, *inter alia*, Bridgeloan Investors, Inc. (“BRIDGELoAN”), to RIVBRIX, and the following sham transfer from RIVBRIX to Mantilla, knowingly dealing with stolen properties, is forever null and void, and in violation of, Title 18 U.S.C., § 1957.

Count 904 – At all times relevant, Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp. (collectively “Mantilla”), and other Perpetrators implicated, all knew, and had to know that, they were all engaging in a financial transaction representing the proceeds derived from a criminal scheme depriving, extorting, and stealing certain properties from Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN#2013R0416072 Deed Sham Transfer Parcel 4 for \$50,000 for 10,000 SF of land (\$5.00 SF) from

RIVBRIX (No Tax Id.) to Mantilla (Tax Id. #46-1968325). The record displayed shows a brazen scheme, depriving and extorting Tavares' Miami River Marina Property in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer ("Judge Langer"), Thomas R. Lehman ("Lehman"), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitiero, and further showing the Perpetrators' conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares' Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares' Properties, *inter alia*, Bridgeloan Investors, Inc. ("BRIDGELoAN"), to RIVBRIX, and the following sham transfer from RIVBRIX to Mantilla, knowingly dealing with stolen properties, is forever null and void, money laundering the proceeds of the scheme, in violation of, Title 18 U.S.C. §1956 (Laundering of Monetary Instruments).

Count 905 – Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp. (collectively "Mantilla"), RIVBRIX, LLC, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting Charles Tavares of properties and rights, under color of law, and further, *inter alia*, fraudulently transferring the stolen properties and money laundering the ill-gotten proceeds, Electronic Wires, in violation of, 18, U.S.C., § 1343.

Count 906 - At all times relevant, Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp. (collectively "Mantilla"), RIVBRIX, LLC, 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, 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 907 – Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp. (collectively "Mantilla"), RIVBRIX, LLC, 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

908	May 21, 2013	<u>U. S. CODE TITLE 18</u>	Erica Lee English Harold Eugene Lindsey III Katz Barron Faust Squitero David P. Applebaum Barbara J. Parrish Roberto A. Pedroso Pedro Gomez MUNB Loan Holdings, LLC The Bank of New York Mellon The Continued Criminal Enterprise
909		§ 371 Conspiracy to Defraud the USA &	
910		§ 241 Conspiracy Against Rights &	
911		§ 1346 Scheme/Artifice to Defraud &	
912		§ 1344 Bank Fraud &	
913		§ 1341 Mail Fraud &	
914		§ 1961 <i>et seq.</i> – RICO &	
		<u>FLORIDA STATUTES</u>	
	Title XLVI § 817.155 Fraudulent Practices		

On May 21, 2013, in response to victim Charles Tavares (“Tavares”) exposing to, *inter alia*, The Bank of New York Mellon’s (“BNY Mellon”), executives, directors, agents, and attorneys, the continued criminal scheme depriving and extorting U.S. citizen Tavares of properties and rights, under color of law, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009 -93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), vitiated by fraud by officers of the court, BNY Mellon’s attorney Erica Lee English (“English”) (Florida Bar No. 599.328) at Katz Barron Faust Squitero (“Katz Barron”), transmits, with unclean hands, via U.S. Mail, a [Sham Response Letter](#)²⁵⁹ (“**Katz Barron’s Sham Letter**”) to prevent justice and cover up the scheme. See Katz Barron’s Doc. h:\lib\docs\13372004\ltr\mc6361.docx. BNY Mellon and its representatives all know in truth and in fact that they are knowingly and intentionally depriving and extorting Tavares of properties and rights, and the United States of honest services upon courts.

²⁵⁹ Among other fraudulent statements on [Katz Barron’s Sham Letter](#) that Katz Barron knew – and had to know to be false, falsely states that: **(a)** “Neither Mellon nor its agents, employees or representatives engaged in (or knew or should have known of) any false or fraudulent actions involving Miami River Park Marina, Inc. or its principals” ; **(b)** “There was and is nothing false or fraudulent about Mellon’s activities in obtaining payment or indebtedness owed by Bridgeloan to Mellon”; **(c)** “The entry of the Final Judgment on Intervenor Complaint for Enforcement of Collateral Assignment of Mortgage in favor of Mellon on April 8, 2011, was appropriate in all aspects”; and **(d)** “Based upon the foregoing, we demand that you refrain from making any more unfounded allegations against Mellon or its representatives.” At all relevant times, BNY Mellon and its representatives knew that BNY Mellon, its agents, employees and representatives engaged in a scheme depriving and extorting, *inter alia*, borrower Charles Tavares (“Tavares”) and Tavares’ Companies Brickell Village One, LLC, 2148 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively “Tavares’ Companies”) in the sham loans and in the BRIDGELOAN Case. BNY Mellon and its representatives not only knew of the scheme, but continuously for years, participated in the scheme, providing the sham loan to Tavares through BRIDGELOAN’s known CCE, further showing BNY Mellon engaging in artifices, *e.g.*, to devalue Tavares’ properties securing the [sham loan with Sham Appraisals](#) by, *inter alia*, BNY Mellon employees Roberto A. Pedroso and Pedro Gomez. BNY Mellon and its representatives all knew in truth and in fact that the Final Judgements entered on [an invalid unnoticed and staged sham “Trial” on April 8, 2011](#), is patently false, invalid and fraudulent, rendering the Final Judgments null and void. The Record displayed shows, and BNY Mellon and its representatives further knew they are systematically extorting Tavares and knew that [presiding Judge Norma S. Lindsey](#) (“Judge Lindsey”) is wife to BNY Mellon’s implicated attorney Harold Eugene Lindsey III (“Lindsey III”), furthering the scheme, and preventing justice to cover up BNY Mellon’s schemes. See Record.

COUNTS

Count 908 - 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 909 - 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 910 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 911 - Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, David P. Applebaum, Barbara J. Parrish, Roberto A. Pedroso, Pedro Gomez, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon ("BNY Mellon"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to commit bank fraud by knowingly and intentionally defrauding BNY Mellon, and BNY Mellon's Shareholders, by, *inter alia*, joining together with Bridgeloan Investors, Inc.'s known Transnational Continued Criminal Enterprise ("BRIDGELoAN's Criminal Enterprise" or "CCE") to provide a sham and conflicted loan to U.S. citizen and borrower Charles Tavares ("Tavares"), and Tavares' Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively "Tavares' Companies"), intentionally and knowingly causing the loan into default, by systematically and repeatedly committing torts, *inter alia*, interfering with the loan, Tavares' Companies, and Tavares' partners and investors, ordering and producing sham appraisals to devalue Tavares' properties securing the sham loan, conspiring to defraud and extort Tavares of Tavares' Collateral Properties in sham court proceedings in the BRIDGELoAN Case, and producing, together with other Perpetrators implicated, two false, invalid, fraudulent, null and void Final Judgments in a patently invalid and fraudulent unnoticed sham "Trial" on April 8, 2011, successfully depriving and extorting Tavares of properties and rights, further causing corrupt Judge Norma S. Lindsey, wife to BNY Mellon's attorney Harold Eugene Lindsey III to preside the case to prevent justice and cover up the brazen scheme, further defrauding BNY Mellon and BNY Mellon's Shareholders in violation of, 18, U.S.C., § 1344.

Count 912 - Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, David P. Applebaum, Barbara J. Parrish, Roberto A. Pedroso, Pedro Gomez, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon ("BNY Mellon"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme coercing, intimidating, depriving, and extorting Charles Tavares ("Tavares") of properties and rights, and preventing justice to cover up

schemes, under color of law, in subverted proceedings upon Miami Courts, to wit – among others, transmitting, on May 21, 2013, Via [U.S Postal Mail](#), a [Sham Response Letter](#), Katz Barron's Doc. h:\lib\docs\13372004\ltr\mc6361.docx., furthering BRIDGELoan's CCE underlying scheme upon the courts to: **(912a)** "Charles Tavares 444 Brickell Avenue, Suite 720, Miami, Florida 33131", in violation Title 18, U.S.C., § 1341.

Count 913 - At all times relevant, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, David P. Applebaum, Barbara J. Parrish, Roberto A. Pedroso, Pedro Gomez, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon ("BNY Mellon"), 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, conning, coercing, threatening, intimidating, depriving, and extorting U.S. citizen Charles Tavares, preventing justice, covering up schemes, acts involving theft, 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 914 – At all times relevant, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, David P. Applebaum, Barbara J. Parrish, Roberto A. Pedroso, Pedro Gomez, MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon ("BNY Mellon"), and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to commit bank fraud by knowingly and intentionally defrauding BNY Mellon, and BNY Mellon's Shareholders, by, *inter alia*, joining together with Bridgeloan Investors, Inc.'s known Transnational Continued Criminal Enterprise ("BRIDGELoan's Criminal Enterprise" or "CCE") to provide a sham and conflicted loan to U.S. citizen and borrower Charles Tavares ("Tavares"), and Tavares' Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (collectively "Tavares' Companies"), intentionally and knowingly causing the loan into default, by systematically and repeatedly committing torts, *inter alia*, interfering with the loan, Tavares' Companies, and Tavares' partners and investors, ordering and producing sham appraisals to devalue Tavares' properties securing the sham loan, conspiring to defraud and extort Tavares of Tavares' Collateral Properties in sham court proceedings in the BRIDGELoan Case, and producing, together with other Perpetrators implicated, two false, invalid, fraudulent, null and void Final Judgments in a patently invalid and fraudulent unnoticed sham "Trial" on April 8, 2011, successfully depriving and extorting Tavares of properties and rights, further causing corrupt Judge Norma S. Lindsey, wife to BNY Mellon's attorney Harold Eugene Lindsey III to preside the case to prevent justice and cover up the brazen scheme, using artifices intimidating, coercing, and extorting Tavares, and preventing justice 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

915	July 24, 2013	U. S. CODE TITLE 18	Elias Antonio Souto Barreto
916		§ 371 Conspiracy to Defraud the USA	Luciana P. Q. Barreto
917		&	JABIR, LLC
918		§ 241 Conspiracy Against Rights	Joseph Horn
919		&	Ralph Horn
920		§ 1346 Scheme/Artifice to Defraud	Ricardo Eichenwald
921		&	Fernando Braghin
		§ 1343 Wire Defraud	Nelson Slosbergas
	&	Michael J. Freeman	
	§ 1956 Money Laundering	Bridgeloan Investors, Inc.	
	&	Carlos Eduardo Pais e Jorge	
	§ 1961 <i>et seq.</i> – RICO	Raul Marques	
	&	BANIF Securities Holdings, Ltd (KY)	
	FLORIDA STATUTES	Marco Antonio de Souza	
	Title XLVI § 817.155 Fraudulent Practices	BRIXRIV, LLC	
		The Continued Criminal Enterprise	

On July 24, 2013, Bridgeloan Investors, Inc.’s²⁶⁰ (“BRIDGELOAN”) Transnational Continued Criminal Enterprise (“CCE” or “Criminal Enterprise”), furthering a scheme²⁶¹ depriving and extorting U.S. citizen and victim Charles Tavares’ (“Tavares”) of properties and rights, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), files with the Clerk of the Miami Courts, with unclean hands, a certain [Ground Lease Termination Agreement \(“BRIXRIV’s Sham Termination”\)](#) for two buildings, in a 28,000 SF parcel, part of the Brickell Village One, LLC and 2147 SW 8 Street, LLC’s 105,000 SF of land, containing several residential buildings (“Brickell Buildings”). BRIXRIV’s Sham Termination, prepared by BRIDGELOAN’s Associate Michael J. Freeman (“Michael Freeman”) (Florida Bar No. 155.834), shows Lessor JABIR, LLC, a Florida L.L.C.²⁶² (“JABIR”) (Tax Id. #46-1220650), and Lessee BRIXRIV, LLC, a Florida L.L.C. (“BRIXRIV”) (Tax Id. NONE). At all relevant times the Perpetrators know that they are dealing with properties and rights extorted from Tavares.

²⁶⁰ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF.

²⁶¹ Bridgeloan’s Criminal Enterprise, together with Associate BANIF, and enabler The Bank of New York Mellon (“BNY Mellon”), entraps Tavares in a 2005 sham loan, followed by years of intentional and continued torts and interference with the sham loan by BRIDGELOAN and BNY Mellon, intentionally causing the sham loan into default to further Tavares’ deprivation and extortion in subverted proceedings upon Miami Courts, *inter alia*, in a false unnoticed invalid staged sham “Trial” of April 8, 2011.

²⁶² BRIDGELOAN’s JABIR is led by Associates Elias Antonio Barreto (“Barreto”), Luciana P.Q. Barreto (“Luciana Barreto”), and Fernando Braghin (“Braghin”). To further the scheme, on November 5, 2012, a sham [Assignment of Lessor’s Interest in Ground Lease](#) and [Warranty Deed](#) of the 28,000 SF parcel with two Brickell Buildings (“**Sham Assignment Lessor’s Rights**”), is prepared and recorded by Ignacio Gonzalez Del Valle (“Ignacio Del Valle”) (Florida Bar No. 172.969) at [Weiss Serota Helfman Cole & Bierman, P.L.](#) (“WSH Law”), from the Lopez Castro Trust, transferring rights to JABIR. See WSH Law’s Doc. U:\IGV\Temp.Lopez-Castro to Secisa\Assignment of Lessor’s Interest in a Lease v2.doc. SECISA International Ltda., Inc., a Florida corp. (“SECISA”) (Tax Id. #65-0004246), a Barreto entity since 1990, to, *inter alia*, continuously money launder & tax defraud the United States.

COUNTS

Count 915 - 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 916 - 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 917 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 918 - Elias Antonio Souto Barreto, Luciana P. Q. Barreto, Fernando Braghin, JABIR, LLC, a Florida L.L.C. (Tax Id. 46-1220650), Joseph Horn, Ralph Horn, Ricardo Eichenwald, Nelson Slosbergas (Florida Bar No. 378.887), Michael J. Freeman (Florida Bar No. 155.8340, Bridgeloan Investors, Inc., a Florida corp. (Tax Id. #65-0665516), Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge, Raul Marques, BANIF Securities Holdings, Ltd., a Cayman Islands company, Marco Antonio de Souza, BANIF Brickell, LLC, a Florida L.L.C. (Tax Id. NONE), and RIVBRIX, LLC, a Florida L.L.C. (Tax Id. NONE) (all collectively "RIVBRIX" or "BRIDGELoAN'S CCE"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a continued underlying criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares ("Tavares") of properties and rights, under color of law in sham subverted proceedings in the in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), electronic wires to further the scheme, in violation of, 18, U.S.C., § 1343.

Count 919 - Elias Antonio Souto Barreto, Luciana P. Q. Barreto, Fernando Braghin, JABIR, LLC, a Florida L.L.C. (Tax Id. 46-1220650), Joseph Horn, Ralph Horn, Ricardo Eichenwald, Nelson Slosbergas (Florida Bar No. 378.887), Michael J. Freeman (Florida Bar No. 155.8340, Bridgeloan Investors, Inc., a Florida corp. (Tax Id. #65-0665516), Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge, Raul Marques, BANIF Securities Holdings, Ltd., a Cayman Islands company, Marco Antonio de Souza, BANIF Brickell, LLC, a Florida L.L.C. (Tax Id. NONE), and RIVBRIX, LLC, a Florida L.L.C. (Tax Id. NONE) (all collectively "RIVBRIX" or "BRIDGELoAN'S CCE"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a continued underlying scheme depriving, stealing, and extorting U.S. citizen Charles Tavares ("Tavares") of properties and rights, under color of law in sham subverted proceedings in the in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v.*

Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), a certain [Ground Lease Termination Agreement](#) (“BRIXRIV’s Sham Termination”) for two buildings, in a 28,000 SF parcel, part of the Brickell Village One, LLC and 2147 SW 8 Street, LLC’s 105,000 SF of land, containing several residential buildings (“Brickell Buildings”). At all relevant times, RIVBRIX knew – and had to know that, they are dealing with extorted and stolen properties and rights of Tavares, and the record displayed in the BRIDGELOAN Case shows to any reasonable outside observer that BRIXRIV became the Lessee of the aforesaid 28,000 SF land lease through a scheme depriving and extorting Tavares in sham proceedings, *inter alia*, by officers of the court, predicated on an invalid and fraudulent settlement predicated on fabricated Power of Attorneys of Tavares’ Companies Brickell Village One, LLC and 2147 SW 8 Street, LLC (true “Lessee”), and Miami River Park Marina, Inc. (“Tavares’ Companies”), and patently invalid and fraudulent Final Judgments entered in an unnoticed and staged sham “Trial” of April 8, 2011, rendering the sham Final Judgments forever null and void, and BRIXRIV’s subsequent transfers and actions furthering the scheme, forever null and void. BRIXRIV’s Sham Termination, again, invalidly and fraudulently transferring Tavares’ properties and rights, to disguise, cover up, and money launder the proceeds from the scheme, in violation of, 18, U.S.C., § 1956 (Money Laundering).

Count 920 - At all times relevant, RIVBRIX, LLC, JABIR, LLC, 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. RIVBRIX, 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, conning, coercing, threatening, intimidating, depriving, and extorting U.S. citizen Charles Tavares, preventing justice, covering up schemes, acts involving theft, 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 921 – At all times relevant, RIVBRIX, LLC, JABIR, LLC, and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically and repeatedly commit criminal acts to further a brazen scheme depriving and extorting U.S. citizen Charles Tavares (“Tavares”) and Tavares’ Companies of properties and rights, upon subverted proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, further 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
922	July 24, 2013	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Elias Antonio Souto Barreto Luciana P. Q. Barreto JABIR, LLC
923		§ 241 Conspiracy Against Rights &	Joseph Horn Ralph Horn
924		§ 1346 Scheme/Artifice to Defraud &	Ricardo Eichenwald Fernando Braghin
925		§ 1343 Wire Defraud &	Nelson Slosbergas Michael J. Freeman
926		§ 1956 Money Laundering &	Bridgeloan Investors, Inc. Carlos Eduardo Pais e Jorge
927		§ 1961 <i>et seq.</i> – RICO &	BANIF Securities Holdings, Ltd (KY) BRIXRIV, LLC
928		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	Daniel J. Rosenberg Michael D. Cohen BEHRINGER HARVARD BRICKELL The Continued Criminal Enterprise

On July 24, 2013, Bridgeloan Investors, Inc.'s²⁶³ ("BRIDGELOAN"), furthering a scheme²⁶⁴ depriving and extorting U.S. citizen and victim Charles Tavares' ("Tavares") of properties and rights, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELOAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), files with the Clerk of Miami Courts, with unclean hands, a Warranty Deed²⁶⁵ ("JABIR's SHAM DEED") from Jabir, LLC, a Florida L.L.C. ("JABIR") (Tax Id. #46-1220650) to Behringer Harvard Brickell Project Owner, LLC, a Delaware company ("BEHRINGER HARVARD BRICKELL"), for two buildings, in a 28,000 SF parcel, part of the Brickell Village One, LLC and 2147 SW 8 Street, LLC's 105,000 SF of land, containing several residential buildings ("Brickell Buildings"). At all relevant times the Perpetrators know they are dealing with properties and rights extorted from Tavares in the sham BRIDGELOAN case.

²⁶³ BRIDGELOAN is an entity used by Joseph Horn's ("Horn") Transnational Continued Criminal Enterprise ("CCE" "Criminal Enterprise") specialized in intercontinental money laundering, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities' fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank's ("BANIF") corrupt executives and attorneys that hijacked BANIF, and to further the scheme, using JABIR to further the scheme, created by Elias Antonio Barreto ("Barreto"), Luciana P. Q. Barreto ("Luciana Barreto"), and Fernando Braghin ("Braghin") on October 18, 2012 and dissolved by Braghin on May 26, 2015.

²⁶⁴ BRIDGELOAN's CCE scheme extorting Tavares of properties and rights is set up in a sham loan by BRIDGELOAN & BNY Mellon in 2005. Unknown, and undisclosed to borrower Tavares at the time, BRIDGELOAN is an entity used to, *inter alia*, deprive and extort, and Tavares's attorneys representing Tavares personally and Tavares' Companies, are also Associates of BRIDGELOAN. After the initial sham loan of 2005, Tavares' attorneys, covertly, together with BRIDGELOAN and BNY Mellon, start artifices to interfere with the loan, Tavares' investors and partners, systematically devaluing Tavares' properties securing the sham loan, and intentionally causing the sham loan into default so BRIDGELOAN, BNY Mellon, and Associates using their Florida Bar licenses as guise to deprive and extort, successfully extort Tavares' properties in subverted Court proceedings.

²⁶⁵ JABIR's Sham Deed is prepared by Sandra Elizabeth Krumbain Sadov ("Krumbain Sadov") (Florida Bar No. 578.894) at [Shutts & Bowen, LLP](#) ("Shutts Bowen"). Shutts Bowen is also implicated in representing Mellon United National Bank, N.A. n.k.a. The Bank of New York Mellon's ("BNY Mellon") in the Sham BRIDGELOAN loans to Tavares, as part of the extortion. *See* Record.

COUNTS

Count 922 - 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 923 - 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 924 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 925 - Elias Antonio Barreto, Luciana P. Q. Barreto, Fernando Braghin, JABIR, LLC, a Florida L.L.C. (Tax Id. 46-1220650), Joseph Horn, Ralph Horn, Ricardo Eichenwald, Nelson Slosbergas (Florida Bar No. 378.887), Michael J. Freeman (Florida Bar No. 155.8340, Bridgeloan Investors, Inc., a Florida corp. (Tax Id. #65-0665516), Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge, Raul Marques, BANIF Securities Holdings, Ltd., a Cayman Islands company, Marco Antonio de Souza, BANIF Brickell, LLC, a Florida L.L.C. (Tax Id. None) and RIVBRIX, LLC, a Florida L.L.C. (Tax Id. None) (collectively "RIVBRIX" or "BRIDGELoAN'S CCE"), Daniel J. Rosenberg, Michael D. Cohen ("Michael Cohen"), Behringer Harvard Brickell Project Owner, LLC a.k.a. Behringer Harvard Multifamily REIT I, Inc., a Maryland company (Tax Id. #20-5383745) ("BEHRINGER HARVARD BRICKELL"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a continued underlying criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares ("Tavares") of properties and rights, under color of law in sham subverted proceedings in the in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), electronic wires to further the scheme, in violation of, 18, U.S.C., § 1343.

Count 926 - Elias Antonio Barreto, Luciana P. Q. Barreto, Fernando Braghin, JABIR, LLC, a Florida L.L.C. (Tax Id. 46-1220650), Joseph Horn, Ralph Horn, Ricardo Eichenwald, Nelson Slosbergas (Florida Bar No. 378.887), Michael J. Freeman (Florida Bar No. 155.8340, Bridgeloan Investors, Inc., a Florida corp. (Tax Id. #65-0665516), Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge, Raul Marques, BANIF Securities Holdings, Ltd., a Cayman Islands company, Marco Antonio de Souza, BANIF Brickell, LLC, a Florida L.L.C. (Tax Id. None) and RIVBRIX, LLC, a Florida L.L.C. (Tax Id. None) (collectively "RIVBRIX" or "BRIDGELoAN'S CCE"), Daniel J. Rosenberg Michael D. Cohen, Behringer Harvard Brickell Project Owner, LLC, a Delaware company a.k.a. Behringer Harvard Multifamily REIT I, Inc., a Maryland company (Tax Id. #20-5383745) ("BEHRINGER HARVARD BRICKELL"), and other Perpetrators implicated, did knowingly and

intentionally, use, as an artifice to further a continued underlying criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares (“Tavares”) of properties and rights, under color of law in sham subverted proceedings in the in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), a certain transfer of rights and properties through a [sham Warranty Deed](#) (“**JABIR’s SHAM DEED**”) from Jabir, LLC, a Florida L.L.C. (“JABIR”) (Tax Id. #46-1220650) to [Behringer Harvard Brickell Project Owner, LLC, a Delaware company](#) (“BEHRINGER HARVARD BRICKELL”), for two buildings, in a 28,000 SF parcel, part of the Brickell Village One, LLC and 2147 SW 8 Street, LLC’s 105,000 SF of land, containing several residential buildings (“Brickell Buildings”). At all relevant times, RIVBRIX, BEHRINGER HARVARD BRICKELL, and other Perpetrators implicated knew – and had to know that, they are dealing with extorted and stolen properties and rights of Tavares, and the record displayed in the BRIDGELoAN Case shows to any reasonable outside observer that BRIDGELoAN, BRIXRIV, and JABIR obtained Tavares’ Brickell Buildings through fraudulent means, *inter alia*, by a scheme upon the Miami Courts by officers of the court, predicated on an invalid and fraudulent settlement predicated on fabricated Power of Attorneys of Tavares’ Companies Brickell Village One, LLC and 2147 SW 8 Street, LLC (true “Lessee”), and Miami River Park Marina, Inc. (“Tavares’ Companies”), and with patently false, invalid and fraudulent Final Judgments entered in an unnoticed invalid staged sham “*Trial*” of April 8, 2011, rendering the sham Final Judgments forever null and void, and BRIXRIV’s subsequent transfers and actions furthering the scheme, forever null and void. BRIDGELoAN, BRIXRIV, and JABIR, and BEHRINGER HARVARD BRICKELL’s known and intentional invalid and fraudulent transfer of Tavares’ properties and rights to disguise, cover up, and money launder the proceeds from the scheme, is in violation of, 18, U.S.C., § 1956 (Money Laundering).

Count 927 - At all times relevant, BRIDGELoAN, RIVBRIX, JABIR, and BEHRINGER HARVARD BRICKELL, 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, conning, coercing, threatening, intimidating, depriving, and extorting U.S. citizen Charles Tavares, preventing justice, covering up schemes, acts involving theft, 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 extorting Tavares in 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 928 – At all times relevant, the Perpetrators Implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically and repeatedly commit criminal acts to cover up and further a brazen continued underlying criminal scheme depriving and extorting Charles Tavares and Tavares’ Companies, upon subverted proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, further 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**

929	December 4, 2013	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Norma Shepard Lindsey Miami Courts The Continued Criminal Enterprise
930		§ 241 Conspiracy Against Rights &	
931		§ 242 Deprivation Rights Under Color of Law &	
932		§ 1346 Scheme/Artifice to Defraud &	
933		§ 1961 <i>et seq.</i> – RICO &	
934		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
935	FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3		

On December 4, 2012, corrupt Judge Norma S. Lindsey (“Judge Lindsey”) (Florida Bar No. 994.812) after exposed²⁶⁶ by Charles Tavares (“Tavares”) to be presiding, in an intentional fatal conflict of interest, Tavares’ four sham Related Cases²⁶⁷ to willfully further a brazen scheme by Bridgeloan Investors, Inc.’s²⁶⁸ (“BRIDGELOAN”), together with other Perpetrators implicated, continuously depriving and extorting, under color of law, U.S. citizen and victim Tavares of more than \$50 million dollars in properties and rights upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), enters, with unclean hands a [Recusal Order](#) (“**Recusal Order**”). The Record shows corrupt Judge Lindsey and other implicated officers of the court²⁶⁹ systematically depriving and extorting Tavares of properties and rights to prevent justice and cover up the successful scheme, further defrauding the State of Florida and the United States of America of honest services upon courts of law.

²⁶⁶ Since January 2013, when corrupt Judge Lindsey is intentionally appointed to Tavares’ Related Cases, she systematically enters irreconcilable, contradictory and unconstitutional rulings to further the BRIDGELOAN scheme, prevent justice and cover for implicated officers of the courts, *inter alia*, corrupt Judge Lindsey’s husband and implicated attorney Harold Eugene Lindsey III (“Lindsey III”) at Katz Barron Faust Squitero (“Katz Barron”), representing MUNB Loan Holdings, LLC (“BNY Mellon”).

²⁶⁷ BRIDGELOAN’s CCE surrounds the Sham Related Cases, *inter alia*, the BRIDGELOAN Case; *The Bank of New York Mellon v. Charles Tavares*, Case No. 2010-26864-CA-30 (“BNY Mellon” Case); *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No. 2011-29624-CA-30 (BCP & Car Wash” Case); and *Deutsche National Bank & Trust v. Charles Tavares*, Case No. 2012-20197-CA-30, with Associates and corrupt Judges, *inter alia*, Judge Lindsey to further the schemes. Corrupt Judge Lindsey willfully [stays in the sham BNY Mellon Case until February 2014](#) to extort Tavares of Tavares’ homestead.

²⁶⁸ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF.

²⁶⁹ *See, e.g.*, attorneys implicated in the BRIDGELOAN Case, continuously depriving and extorting Tavares, under color of law, Tavares’ corrupt attorneys Richard A. Morgan, James Doddo, Carl T. Williams, Buchanan Ingersoll & Rooney, PC, and opposing corrupt attorneys Matthew P. Leto, Andrew C. Hall, Hall Lamb and Hall, P.A., Erica Lee English, Lindsey III, Katz Barron.

COUNTS

Count 929 - 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 930 - 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 931 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 932 - 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 933 - At all times relevant, shameless reckless and corrupt Judge Norma Shepard Lindsey ("Judge Lindsey") (Florida Bar No. 994.8120, the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares ("Tavares"), and Tavares' Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, 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 934 - Shameless reckless and corrupt Judge Norma Shepard Lindsey (“Judge Lindsey”) (Florida Bar No. 994.8120), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares (“Tavares”), and Tavares’ Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against, *inter alia*, the State of Florida, 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 Florida, and further depriving the State of Florida of honest services upon courts of law in Florida, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 935 – Shameless reckless and corrupt Judge Norma Shepard Lindsey (“Judge Lindsey”) (Florida Bar No. 994.8120), and other officers of the court implicated, did knowingly and intentionally, with conflict of interests, 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 U.S. Citizen Charles Tavares’ (“Tavares”) constitutionally guaranteed rights, due process, by systematically holding and presiding sham hearings, proceedings, sham trials, and entering sham invalid and fraudulent Orders 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

936	March 26, 2014	U. S. CODE TITLE 18	Daniel J. Rosenberg Michael D. Cohen BEHRINGER HARVARD BRICKELL MONOGRAM BRICKELL The Continued Criminal Enterprise
937		§ 371 Conspiracy to Defraud the USA &	
938		§ 241 Conspiracy Against Rights &	
939		§ 1346 Scheme/Artifice to Defraud &	
940		§ 1343 Wire Defraud &	
941		§ 1956 Money Laundering &	
942		§ 1961 <i>et seq.</i> – RICO &	
		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

On March 26, 2014, Behringer Harvard Brickell Project Owner, LLC, a Delaware company a.k.a. Behringer Harvard Multifamily REIT I, Inc., a Maryland company (Tax Id. #20-5383745) (“BEHRINGER HARVARD BRICKELL”), furthering Bridgeloan Investors, Inc.’s²⁷⁰ (“BRIDGELOAN”) underlying scheme²⁷¹ depriving and extorting U.S. citizen victim Charles Tavares’ (“Tavares”) of properties and rights, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), files, with, *inter alia*, the Florida Department of State, with unclean hands, an [Amendment](#) (“**Name Change**”) changing its name to Monogram Residential Brickell Project Owner, LLC, a Delaware company a.k.a. Monogram Residential Trust, Inc. (NYSE: MORE) (“MONOGRAM BRICKELL”). At all relevant times, Daniel J. Rosenberg (“Rosenberg”), Michael D. Cohen (“Cohen”), BEHRINGER HARVARD, MONOGRAM BRICKELL, and BRIDGELOAN’s CCE know²⁷² in truth and in fact, and the record displayed shows that they are dealing with properties and rights extorted from Tavares and Tavares’ Companies.

²⁷⁰ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF, and to further the scheme, using JABIR to further the scheme, created by Elias Antonio Barreto (“Barreto”), Luciana P. Q. Barreto (“Luciana Barreto”), and Fernando Braghin (“Braghin”) on October 18, 2012 and dissolved by Braghin on May 26, 2015.

²⁷¹ BRIDGELOAN’s CCE scheme extorting Tavares of \$50 million dollars in properties and rights is set up in a sham loan by BRIDGELOAN & BNY Mellon in 2005. Unknown, and undisclosed to borrower Tavares at the time, BRIDGELOAN is an entity used to, *inter alia*, deprive and extort, and Tavares’s attorneys representing Tavares personally and Tavares’ Companies, are also Associates of BRIDGELOAN. After the initial sham loan of 2005, Tavares’ attorneys, covertly, together with BRIDGELOAN and BNY Mellon, start artifices to interfere with the loan, Tavares’ investors and partners, systematically devaluing Tavares’ properties securing the sham loan, and intentionally causing the sham loan into default so BRIDGELOAN, BNY Mellon, and Associates using their Florida Bar licenses as guise to deprive and extort, successfully extort Tavares’ properties in subverted Court proceedings, and showing invalid and Final Judgements in an unnoticed staged sham “*Trial*” of April 8, 2011.

²⁷² The Perpetrators, *inter alia*, Cohen, Rosenberg, BEHRINGER HARVARD, MONOGRAM BRICKELL, and CCE, all received notices and uncontroversial hard evidence of the frauds showing the transfer of Tavares’ properties and rights is fraudulent and void.

COUNTS

Count 936 - 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 937 - 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 938 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 939 - Daniel J. Rosenberg, Michael D. Cohen ("Michael Cohen"), Behringer Harvard Brickell Project Owner, LLC a.k.a. Behringer Harvard Multifamily REIT I, Inc., a Maryland company (Tax Id. #20-5383745) ("BEHRINGER HARVARD BRICKELL"), Monogran Residential Trust, Inc. (NYSE: MORE) ("MONOGRAM BRICKELL"), Bridgeloan Investors, Inc., a Florida corp. (Tax Id. #65-0665516), Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge, Raul Marques, BANIF Securities Holdings, Ltd., a Cayman Islands company, Marco Antonio de Souza, BANIF Brickell, LLC, a Florida L.L.C. (Tax Id. None) and RIVBRIX, LLC, a Florida L.L.C. (Tax Id. None) (collectively "RIVBRIX" or "BRIDGELOAN'S CCE"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a continued underlying criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares ("Tavares") of properties and rights, under color of law in sham subverted proceedings in the in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELOAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) ("Miami Courts"), electronic wires to further the scheme, in violation of, 18, U.S.C., § 1343.

Count 940 - Daniel J. Rosenberg, Michael D. Cohen ("Michael Cohen"), Behringer Harvard Brickell Project Owner, LLC a.k.a. Behringer Harvard Multifamily REIT I, Inc., a Maryland company (Tax Id. #20-5383745) ("BEHRINGER HARVARD BRICKELL"), Monogran Residential Trust, Inc. (NYSE: MORE) ("MONOGRAM BRICKELL"), Bridgeloan Investors, Inc., a Florida corp. (Tax Id. #65-0665516), Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge, Raul Marques, BANIF Securities Holdings, Ltd., a Cayman Islands company, Marco Antonio de Souza, BANIF Brickell, LLC, a Florida L.L.C. (Tax Id. None) and RIVBRIX, LLC, a Florida L.L.C. (Tax Id. None) (collectively "RIVBRIX" or "BRIDGELOAN'S CCE"), 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") of properties and rights, under color of law in sham subverted proceedings in the in the sham styled-case *Bridgeloan*

Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), a certain transfer of rights and properties through a [sham Warranty Deed](#) (“**JABIR’s SHAM DEED**”) from Jabir, LLC, a Florida L.L.C. (“JABIR”) (Tax Id. #46-1220650) to [Behringer Harvard Brickell Project Owner, LLC, a Delaware company](#) (“BEHRINGER HARVARD BRICKELL”), for two buildings, in a 28,000 SF parcel, part of the Brickell Village One, LLC and 2147 SW 8 Street, LLC’s 105,000 SF of land, containing several residential buildings (“Brickell Buildings”). At all relevant times, RIVBRIX, BEHRINGER HARVARD BRICKELL, and other Perpetrators implicated knew – and had to know that, they are dealing with extorted and stolen properties and rights of Tavares, and the record displayed in the BRIDGELoAN Case shows to any reasonable outside observer that BRIDGELoAN, BRIXRIV, and JABIR obtained Tavares’ Brickell Buildings through fraudulent means, *inter alia*, by a scheme upon the Miami Courts by officers of the court, predicated on an invalid and fraudulent settlement predicated on fabricated Power of Attorneys of Tavares’ Companies Brickell Village One, LLC and 2147 SW 8 Street, LLC (true “Lessee”), and Miami River Park Marina, Inc. (“Tavares’ Companies”), and with patently false, invalid and fraudulent Final Judgments entered in an unnoticed invalid staged sham “*Trial*” of April 8, 2011, rendering the sham Final Judgments forever null and void, and BRIXRIV’s subsequent transfers and [actions](#) furthering the scheme, forever null and void. BRIDGELoAN, BRIXRIV, JABIR, BEHRINGER HARVARD BRICKELL, and MONOGRAM BRICKELL’s known and intentional invalid and fraudulent transfer of Tavares’ properties and rights to disguise, cover up, and money launder the proceeds from the scheme, is in violation of, 18, U.S.C., § 1956 (Money Laundering).

Count 941 - At all times relevant, BRIDGELoAN, RIVBRIX, JABIR, BEHRINGER HARVARD BRICKELL, and MONOGRAM BRICKELL, 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, conning, coercing, threatening, intimidating, depriving, and extorting U.S. citizen Charles Tavares, preventing justice, covering up schemes, acts involving theft, 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 extorting Tavares in 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 942 – At all times relevant, the Perpetrators Implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically and repeatedly commit criminal acts to cover up and further a brazen scheme depriving and extorting Charles Tavares and Tavares’ Companies, upon subverted proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, further systematically depriving the State of Florida of honest services upon Florida courts, and further using [artifices to money launder the ill-gotten proceeds](#) and cover the scheme to prevent justice, in violation of, §817.155, F.S. (Fraudulent Practices).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
943	September 28, 2015	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Pedro Mantilla Coral Group Property Advisors, Inc Juan Carlos Mantilla Ricardo Mantilla 2000 Coral Group, LLC The Continued Criminal Enterprise
944		§ 241 Conspiracy Against Rights &	
945		§ 1346 Scheme/Artifice to Defraud &	
946		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	
947		§ 1956 Laundering of Monetary Instruments &	
948		§ 1343 Electronic Wire Fraud &	
949		§ 1961 <i>et seq.</i> – RICO &	
950		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

On September 28, 2015, Pedro Mantilla’s Coral Group Property Advisors, Inc., a Florida corp. (“Mantilla”), in furtherance of a continued underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise²⁷³ (“Criminal Enterprise” or “CCE”), together with other Perpetrators implicated, continuously depriving and extorting U.S. citizen and victim Charles Tavares (“Tavares”) of properties and rights, under color of law, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), Quit Claims a Deed for \$56,800 of a 10,000 SF Parcel (\$5.68 per SF) (“**Sham Quit Claim Parcel 4**”) of Tavares’ 9 Acres Miami River Marina Property (“Tavares’ Property”) owned²⁷⁴ by Tavares’ Company Miami River Park Marina, Inc. (“MRPM”) to Juan Carlos Mantilla’s 2000 Coral Group, LLC, a Florida L.L.C.²⁷⁵ (“Mantilla 2”). At all relevant times the Perpetrators know the underlying transfers of Parcel 4 are invalid and fraudulent.

²⁷³ RIVBRIX, LLC, a Florida L.L.C. (“RIVBRIX”), is an entity used to money launder and tax defraud by BRIDGELOAN’s CCE, led by Joseph Horn (“Horn”), Ralph Horn (“Horn”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Daniel Ades (“Ades”), and Nelson Slosbergas, together with Associate BANIF Securities Holdings, Ltd., a Cayman Islands company and BANIF Miami River, LLC, a Florida L.L.C. (collectively “BANIF”), led by, *inter alia*, Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge (“Carlos Pais Jorge”), Raul Marques (“Marques”), Marco Antonio de Souza (“De Souza”), and Pedro Serzedelo (“Serzedelo”).

²⁷⁴ On April 8, 2011, BRIDGELOAN’s CCE, with corrupt officers of the court, stage a sham unnoticed and invalid “*Trial*”, for corrupt Judge Allan Lester Langer, to knowingly and intentionally, enter two fraudulent and invalid Final Judgments, predicated on a sham settlement, fraudulently produced by Tavares’ attorneys Levine Kellogg Lehman Schneider + Grossman, LLP and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), conspiring together with, *inter alia*, opposing counsels Hall, Lamb, Hall, P.A. (Hall & Lamb”), and Katz Barron Faust Squitiero (“Katz Barron”), fraudulently and invalidly depriving and extorting Tavares of Tavares’ Property, rendering the invalid and fraudulent Final Judgements, and future transfers, forever null and void.

²⁷⁵ See CFN#2015R0670213 **Sham Quit Claim Parcel 4** of 10,000 SF of land from Mantilla to Mantilla 2 (“Tax Id. #47-5608150), and on June 30, 2021, Mantilla & Mantilla 2, sells Parcel 4 for \$250,000 (\$25.00 SF), money laundering the proceeds from BRIDGELOAN/RIVBRIX’s extortion of Tavares upon subverted Miami Courts, see Miami Clerk Records at CFN 2021R0510905.

COUNTS

Count 943 - 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 944 - 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 945 - 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 946 – At all times relevant, Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp. (collectively “Mantilla”), Juan Carlos Mantilla, Ricardo Mantilla, 2000 Coral Gorup, LLC, a Florida L.L.C. (collectively “Mantilla 2”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN#2013R0416072 Deed Sham Transfer Parcel 4 for \$50,000 for 10,000 SF of land (\$5.00 SF) from RIVBRIX (No Tax Id.) to Mantilla (Tax Id. #46-1968325). The record displayed shows a brazen underlying scheme depriving and extorting Tavares’ Miami River Marina Property, in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer, and Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitiero, and further showing the Perpetrators’ conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares’ Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares’ Properties, *inter alia*, Bridgeloan Investors, Inc. (“BRIDGELoAN”), to RIVBRIX, the following sham transfer from RIVBRIX to Mantilla, and from Mantilla to Mantilla 2, knowingly dealing with stolen properties, is forever null and void, and in violation of, Title 18 U.S.C., § 1957.

Count 947 – At all times relevant, Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp. (collectively “Mantilla”), Juan Carlos Mantilla, Ricardo Mantilla, 2000 Coral Gorup, LLC, a Florida L.L.C. (collectively “Mantilla 2”), and other Perpetrators implicated, all knew, and had to know that, they were all engaging in a financial transaction representing the proceeds derived from a continued underlying scheme depriving, extorting, and stealing certain properties from Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN

#2013R0416072 Deed Sham Transfer Parcel 4 for \$50,000 for 10,000 SF of land from RIVBRIX (No Tax Id.) to Mantilla (Tax Id. #46-1968325). The record displayed shows a brazen scheme, depriving and extorting Tavares' Miami River Marina Property in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer ("Judge Langer"), Thomas R. Lehman ("Lehman"), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitiero, and further showing the Perpetrators' conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares' Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfers, forever null and void, of Tavares' Properties, *inter alia*, Bridgeloan Investors, Inc. ("BRIDGELoAN"), to RIVBRIX, and following sham transfer from RIVBRIX to Mantilla, and from Mantilla to Mantilla 2, knowingly dealing with stolen properties, is forever null and void, money laundering the proceeds of the scheme, in violation of, Title 18 U.S.C. §1956 (Laundering of Monetary Instruments).

Count 948 – Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp. (collectively "Mantilla"), Juan Carlos Mantilla, Ricardo Mantilla, 2000 Coral Gorup, LLC, a Florida L.L.C. (collectively "Mantilla 2"), RIVBRIX, LLC, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting Charles Tavares of properties and rights, under color of law, and further, *inter alia*, fraudulently transferring the stolen properties and money laundering the ill-gotten proceeds, Electronic Wires, in violation of, Title 18, U.S.C., § 1343.

Count 949 - At all times relevant, Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp. (collectively "Mantilla"), RIVBRIX, LLC, 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, 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 950 – Pedro Mantilla, Coral Group Property Advisors, Inc., a Florida corp., Juan Carlos Mantilla, Ricardo Mantilla, 2000 Coral Group, LLC, RIVBRIX, LLC, 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
951	October 15, 2015	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Finlay B. Matheson Nancy Stoner South Fork Parcel 1, LLC Philip J. Procacci Elaine Merle Cohen Rennert Vogel Mandler P.A. Miami River Waterfront, LLC The Continued Criminal Enterprise
952		§ 241 Conspiracy Against Rights &	
953		§ 1346 Scheme/Artifice to Defraud &	
954		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	
955		§ 1956 Laundering of Monetary Instruments &	
956		§ 1343 Electronic Wire Fraud &	
957		§ 1961 <i>et seq.</i> – RICO &	
958		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

On October 15, 2015, Finlay B. Matheson’s (“Matheson”) South Fork Parcel 1, LLC, a Florida L.L.C. (“South Fork 1”) (Tax Id. #46-5296498), in furtherance of a continued underlying criminal scheme by Bridgeloan Investors, Inc.’s (“BRIDGELOAN”) Transnational Continued Criminal Enterprise²⁷⁶ (“Criminal Enterprise” or “CCE”), together with other Perpetrators implicated, continuously depriving and extorting U.S. citizen and victim Charles Tavares (“Tavares”) of properties and rights, under color of law, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), transfers part of South Fork 1’s property²⁷⁷ (“**Partial Parcel 1 Sham Transfer**”), fraudulently bought from BRIDGELOAN’s RIVBRIX, LLC on December 18, 2012 (“**Sham Transfer Parcel 1**”) of Tavares’ 9 Acres Miami River Marina Property (“Tavares’ Property”) owned²⁷⁸ by Tavares’ Company Miami River Park Marina, Inc. At all times relevant the record displayed shows the transfers are a sham.

²⁷⁶ RIVBRIX, LLC, a Florida L.L.C., is an entity used to money launder and tax defraud by BRIDGELOAN’s CCE, led by Joseph Horn (“Horn”), Ralph Horn (“Horn”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Daniel Ades (“Ades”), and Nelson Slosbergas, together with Associate BANIF Securities Holdings, Ltd., a Cayman Islands company and BANIF Miami River, LLC, a Florida L.L.C. (collectively “BANIF”), led by, *inter alia*, Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge (“Carlos Pais Jorge”), Raul Marques (“Marques”), Marco Antonio de Souza (“De Souza”), and Pedro Serzedelo (“Serzedelo”).

²⁷⁷ See CFN#2015R0662043 **Deed Partial 1 Sham Transfer** of 31,556 SF of land for \$1,500,000 (\$47.53 per SF) from South Fork 1 to Philip J. Procacci’s (“Procacci”) Miami River Waterfront, LLC, a Florida L.L.C. (Tax Id. #47-2882985), represented by Elaine Merle Cohen (“Elaine Cohen”) (Florida Bar No. 329.975), at Rennert Vogel Mandler & Rodriguez, P.A. (Rennert Vogel”).

²⁷⁸ On April 8, 2011, BRIDGELOAN’s CCE, with corrupt officers of the court, stage a sham unnoticed and invalid “*Trial*”, for corrupt Judge Allan Lester Langer, to knowingly and intentionally, enter two fraudulent and invalid Final Judgments, predicated on a sham settlement, fraudulently produced by Tavares’ attorneys Levine Kellogg Lehman Schneider + Grossman, LLP and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), conspiring together with, *inter alia*, opposing counsels Hall, Lamb, Hall, P.A. (Hall & Lamb”), and Katz Barron Faust Squitiero (“Katz Barron”), fraudulently and invalidly depriving and extorting Tavares’ Properties and rights, rendering the invalid and fraudulent Final Judgements, and future transfers, forever null & void.

COUNTS

Count 951 - 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 952 - 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 953 - 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 954 – At all times relevant, Finlay B. Matheson, Nancy Stoner, South Fork Parcel 1, LLC (“South Fork 1”), Philip J. Procacci, Miami River Waterfront, LLC, a Florida L.L.C., Elaine Merle Cohen, Rennert Vogel Mandler & Rodriguez, P.A., and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN#2012R0912652 Deed Sham Transfer Parcel 1 for \$1,320,000 for 123,428 SF of Riverfront property (\$10.69 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5296498), represented by Stoner. The record displayed shows a brazen underlying scheme extorting Tavares’ Miami River Marina Property, in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitiero, and further showing the Perpetrators’ conscious of guilt by attempting to cover up the invalid and sham staged *Trial* by filing a late sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares, and Tavares’ Properties. The record shows the Final Judgments are patently false, invalid, and fraudulent, and the transfers, *inter alia*, from Bridgeloan Investors, Inc. to RIVBRIX, from RIVBRIX to Finlay B. Matheson’s South Fork Parcel 1, LLC, and the **Partial Parcel 1 Sham Transfer**, are forever null and void. The Perpetrators knowingly deal with stolen properties, in violation of, Title 18 U.S.C., § 1957.

Count 955 – At all times relevant, Finlay B. Matheson, Nancy Stoner, South Fork Parcel 1, LLC, Philip J. Procacci, Miami River Waterfront, LLC, a Florida L.L.C., Elaine Merle Cohen, Rennert Vogel Mandler & Rodriguez, P.A., and other Perpetrators implicated, all knew, and had to know that, they were all engaging in a financial transaction representing the proceeds derived from a criminal scheme depriving, extorting, and stealing certain properties from Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see* CFN#2012R0912652 Deed Sham

Transfer Parcel 1 for \$1,320,000 for 123,428 SF of Riverfront property (\$10.69 SF) from RIVBRIX (No Tax Id.) to Matheson (Tax Id. #46-5296498), represented by Stoner. The record displayed shows a brazen underlying scheme extorting Tavares' Miami River Marina Property in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer ("Judge Langer"), Thomas R. Lehman ("Lehman"), Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitero, and further showing the Perpetrators' conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a sham Notice of Hearing of April 8, 2011, hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares' Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares' Properties, *inter alia*, Bridgeloan Investors, Inc. to RIVBRIX, the following sham transfers from RIVBRIX to Finlay B. Matheson's South Fork Parcel 1, LLC, and the **Partial Parcel 1 Sham Transfer**, knowingly dealing with stolen properties is null and void, money laundering the proceeds of the scheme, in violation of, Title 18 U.S.C. §1956 (Laundering of Monetary Instruments).

Count 956 – Finlay B. Matheson, Nancy Stoner, South Fork Parcel 1, LLC, RIVBRIX, LLC, Philip J. Procacci, Miami River Waterfront, LLC, a Florida L.L.C., Elaine Merle Cohen, Rennert Vogel Mandler & Rodriguez, P.A., and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further their criminal scheme depriving, stealing, and extorting Charles Tavares of properties and rights, under color of law, and further, *inter alia*, fraudulently transferring the stolen properties and money laundering the ill-gotten proceeds, Electronic Wires, in violation of, 18, U.S.C., § 1343.

Count 957 - At all times relevant, Finlay B. Matheson, Nancy Stoner, South Fork Parcel 1, LLC, Philip J. Procacci, Miami River Waterfront, LLC, a Florida L.L.C., Elaine Merle Cohen, Rennert Vogel Mandler & Rodriguez, 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 18 U.S.C. §1961 *et seq.* See, [Tavares Sworn Affidavit](#).

Count 958 – Finlay B. Matheson, Nancy Stoner, South Fork Parcel 1, LLC, Philip J. Procacci, Miami River Waterfront, LLC, a Florida L.L.C., Elaine Merle Cohen, Rennert Vogel Mandler & Rodriguez, P.A., 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
959	September 27, 2016	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Lisa Sharon Walsh Miami Courts Matthew Paul Leto Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. Harold Eugene Lindsey III Katz Barron Faust Squitero The Bank of New York Mellon Sheilamarie Caro National Reporting Service The Continued Criminal Enterprise
960		§ 241 Conspiracy Against Rights &	
961		§ 242 Deprivation Rights Under Color of Law &	
962		§ 1346 Scheme/Artifice to Defraud &	
963		§ 1961 <i>et seq.</i> – RICO &	
964		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
965		FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	

On September 27, 2016, Judge Lisa Walsh (“Judge Walsh”) (Fla. Bar No. 964.610) holds²⁷⁹ a [“Preliminary Hearing”](#) on Defendant Charles Tavares’ *pro se* (“Tavares”) 3rd Motion to Reopen the Case Due to Fraud upon the Miami Courts by Officers of the Court (**“Evidentiary Hearing”**), in the sham *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”). The Evidentiary Hearing is presided by Judge Walsh, attended by Tavares, Plaintiff’s Bridgeloan Investors Inc.’s²⁸⁰ (“BRIDGELoAN”) attorney Mathew P. Leto (“Leto”) at Hall Lamb and Hall, P.A., and Third-Party Intervenor MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon’s (“BNY Mellon”) attorney Harold Eugene Lindsey III (“Lindsey III”), Shorthand Reporter [Sheilamarie Caro](#) (“Caro”) from [National Reporting Service](#) and an unidentified person.²⁸¹ Judge Walsh, willfully ignores the hard evidence on the record showing fraud upon the court by officers of the court, *inter alia*, causing invalid, fraudulent and void Final Judgments entered on an [unnoticed invalid sham staged “Trial” of April 8, 2011](#), predicated on a [sham settlement](#) with fabricated evidence by Tavares’ attorneys, conspiring together with BRIDGELoAN and BNY Mellon’s attorneys, clearly warranting reopening the case pursuant to Florida Rule Civil Procedure 1.540(b)(3)(4), and rights.

²⁷⁹ The record shows, *inter alia*, on October 19, 2012, Tavares’ attorneys at Buchanan Ingersoll & Rooney (“Buchanan Ingersoll”) first set a hearing on a filed [Motion to Reopen the Case](#) due to fraud upon the courts by officers of the court, causing the false, invalid and fraudulent Final Judgments against Tavares in an unnoticed and invalid staged sham “Trial” of April 8, 2011 – and shortly thereafter, Buchanan Ingersoll’s attorneys are successfully threatened, coerced, and extorted by officers of the court to cancel the hearing and withdraw the motion. Since then, Tavares had attempted to set a new hearing on a Motion to Reopen.

²⁸⁰ BRIDGELoAN is an entity used by Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF.

²⁸¹ Tavares asks Judge Walsh: “*May I ask who is the gentleman there?*” Judge Walsh: “*I can ask the question is he a witness or is there – are you just observing?*” Unknown Speaker: “*Yes.*” No answer who that person was, or in which capacity he was attending the Hearing, that proved to be another sham proceeding to extort Tavares, under color of law, further shown on the Hearing’s Transcript being fraudulently transcribed by Caro, *et al.*, to intentionally and knowingly, blur the record. See [Transcript](#).

COUNTS

Count 959 - 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 960 - 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 961 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 962 - 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 963 - At all times relevant, Judge Lisa Sharon Walsh ("Judge Walsh") (Florida Bar No. 964.610), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), Matthew P. Leto, Hall Lamb and Hall, P.A., Bridgeloan Investors, Inc., Harold Eugene Lindsey III, Katz Barron Faust Squitero, P.A., MUNB Loan Holdings, LLC, A/K/A The Bank of New York Mellon ("BNY Mellon"), Sheilamrie Caro, National Reporting Services, Inc. (Tax Id. #65-1138396), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares ("Tavares"), and Tavares' Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, 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 964 - Judge Lisa Sharon Walsh (“Judge Walsh”) (Florida Bar No. 964.610), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), Matthew P. Leto, Hall Lamb and Hall, P.A., Bridgeloan Investors, Inc., Harold Eugene Lindsey III, Katz Barron Faust Squitiero, P.A., MUNB Loan Holdings, LLC, A/K/A The Bank of New York Mellon (“BNY Mellon”), Sheilamrie Caro, National Reporting Services, Inc. (Tax Id. #65-1138396), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares (“Tavares”), and Tavares’ Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against, *inter alia*, the State of Florida, 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 Florida, and further depriving the State of Florida of honest services upon courts of law in Florida, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 965 – Judge Lisa Sharon Walsh (“Judge Walsh”) (Florida Bar No. 964.610), and other officers of the court implicated, did knowingly and intentionally, with conflict of interests, 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 U.S. Citizen Charles Tavares’ (“Tavares”) constitutionally guaranteed rights, due process, by systematically holding and presiding sham hearings, proceedings, sham trials, and entering sham invalid and fraudulent Orders 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

966	October 1, 2016	<u>U. S. CODE TITLE 18</u>	Gisela Cardonne Ely Lisa Sharon Walsh Miami Courts Matthew Paul Leto Hall Lamb and Hall, P.A. Bridgeloan Investors, Inc. Harold Eugene Lindsey III Katz Barron Faust Squitero The Bank of New York Mellon The Continued Criminal Enterprise
967		§ 371 Conspiracy to Defraud the USA &	
968		§ 241 Conspiracy Against Rights &	
969		§ 242 Deprivation Rights Under Color of Law &	
970		§ 1346 Scheme/Artifice to Defraud &	
971		§ 1961 <i>et seq.</i> – RICO &	
972		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>FLORIDA CODE OF JUDICIAL CONDUCT</u> Violations of Canons 1, 2, and 3	

On October 1, 2016, Judge Gisela Cardonne Ely (“Judge Cardonne”) (Fla. Bar No. 218.154), in reckless disregard for the record displayed in the sham *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), showing massive frauds upon the court by officers of the court,²⁸² enters,²⁸³ to prevent justice and cover up the scheme, a [Sham Order Denying](#) Defendant U.S. citizen Charles Tavares’ (“Tavares”) Motion to Reopen the Case Due to Extrinsic Fraud pursuant to Florida Rule Civil Procedure 1.540(b)(3)(4), and Rights under the Due Process Clause of the Florida and U.S. Constitutions (“**Sham Order Denying Reopening**”). The Sham Order Denying Reopening is drafted by implicated attorney Mathew P. Leto (“Leto”), at Hall Lamb and Hall, P.A., see Doc. #{9881/ 00462994.1}, and among other false and contradictory statements, it falsely states that “*the conduct alleged by Tavares, even if true, would only constitute intrinsic fraud*”; and, that, “*In this case, the Final Judgment was entered by the Court on April 8, 2011*”; “*on the day of trial*”. At all times relevant, *inter alia*, reckless Judges Cardonne and Walsh, BRIDGELoAN’s²⁸⁴ attorney Leto, and BNY Mellon’s attorney Harold Eugene Lindsey III, know in truth and in fact that, the Final Judgment is invalid and fraudulent, entered in an unnoticed invalid sham staged “*Trial*” of April 8, 2011, predicated on fraud upon the court by officers of the court, rendering the Final Judgment, pursuant to Florida Rule Civil Procedure 1.540(b), forever null and void.

²⁸² The record displayed in the matter, clearly and uncontroversially shows that, *inter alia*, Tavares’ attorneys Levine Kellogg Lehman Scheider + Grossman, LLP (“LKLS+G”) and Black Srebnick Kornspan & Stumpf, P.A. conspired together with opposing counsels Hall Lamb and Hall, P.A., Alan Samuel Fine, and Katz Barron Faust Squitero, P.A., to produce an invalid and fraudulent settlement predicated on sham Power of Attorneys of Tavares’ Companies fabricated by LKLS+G, *et al.*, further threatening and extorting Tavares not to fight the scheme, and causing corrupt Judge Allan Lester Langer to enter a null & void Final Judgment in an unnoticed invalid sham “*Trial*”, and followed by presiding Judge Norma S. Lindsey’s continued scheme preventing justice.

²⁸³ The Sham Hearing on Tavares’ 3rd Motion to Reopen the Case Due to Extrinsic Frauds is presided on September 27, 2016 by Judge Lisa S. Walsh (Fla. Bar No. 964.610), and the irreconcilable Sham Order Denying is signed by reckless Judge Cardonne.

²⁸⁴ Bridgeloan Investors, Inc. (“BRIDGELoAN”) is an entity used by Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, and tax frauds through the United States, and extortion of U.S. citizens and companies.

COUNTS

Count 966 - 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 967 - 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 968 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 969 - 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 970 - At all times relevant, reckless Judges Gisela Cardonne Ely ("Judge Cardonne") (Florida Bar No. 218.154) and Lisa Sharon Walsh ("Judge Walsh") (Florida Bar No. 964.610), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares ("Tavares"), and Tavares' Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, 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 971 - Reckless Judges Gisela Cardonne Ely (“Judge Cardonne”) (Florida Bar No. 218.154) and Lisa Sharon Walsh (“Judge Walsh”) (Florida Bar No. 964.610), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares (“Tavares”), and Tavares’ Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against, *inter alia*, the State of Florida, 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 Florida, and further depriving the State of Florida of honest services upon courts of law in Florida, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 972 – Reckless Judges Gisela Cardonne Ely (“Judge Cardonne”) (Florida Bar No. 218.154) and Lisa Sharon Walsh (“Judge Walsh”) (Florida Bar No. 964.610), 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 U.S. Citizen Charles Tavares’ (“Tavares”) constitutionally guaranteed rights, due process, by systematically holding and presiding sham hearings, proceedings, sham trials, and entering sham invalid and fraudulent Orders 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

973	September 29, 2017	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA &	Daniel J. Rosenberg Michael D. Cohen BEHRINGER HARVARD BRICKELL
974		§ 241 Conspiracy Against Rights &	MONOGRAM BRICKELL Derek J. Ramsey
975		§ 1346 Scheme/Artifice to Defraud &	Joshua A. Carper GREYSTAR REAL ESTATE PARTNERS
976		§ 1343 Wire Fraud &	The Continued Criminal Enterprise
977		§ 1956 Money Laundering &	
978		§ 1961 <i>et seq.</i> – RICO &	
		<u>FLORIDA STATUTES</u>	
979		Title XLVI § 817.155 Fraudulent Practices	

On September 29, 2017, Monogram Residential Brickell Project Owner, LLC (“Monogram Brickell”) f.k.a. Behringer Harvard Brickell Project Owner, LLC, a Delaware Co. a.k.a. Behringer Harvard Multifamily REIT I, Inc., a Maryland company (Tax Id. #20-5383745) (“Behringer Harvard Brickell”), furthering Bridgeloan Investors, Inc.’s²⁸⁵ (“BRIDGELOAN”) underlying scheme²⁸⁶ depriving and extorting U.S. citizen victim Charles Tavares’ (“Tavares”) of properties and rights, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), files, with, *inter alia*, the Florida Department of State, with unclean hands, an Amendment (“**Name Change**”) changing its name to GS Brickell Project Owner, LLC, a Delaware Co. (“GREYSTAR”). At all relevant times, Daniel Rosenberg, Michael D. Cohen, Behringer, Monogram, Derek Ramsey, Joshua Carper, [GREYSTAR](#), and BRIDGELOAN’s CCE know²⁸⁷ in truth and in fact, and the record displayed shows that they are dealing with properties and rights extorted from Tavares and Tavares’ Companies upon subverted Miami Courts.

²⁸⁵ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, and portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF, and to further the scheme, using JABIR to further the scheme, created by Elias Antonio Barreto (“Barreto”), Luciana P. Q. Barreto (“Luciana Barreto”), and Fernando Braghin (“Braghin”) on October 18, 2012 and dissolved by Braghin on May 26, 2015.

²⁸⁶ The CCE’s scheme extorting Tavares of \$50 million dollars in properties and rights is set up in a sham loan by BRIDGELOAN & BNY Mellon in 2005. Unknown, and undisclosed to borrower Tavares at the time, BRIDGELOAN is an entity used to, *inter alia*, deprive and extort, and Tavares’s attorneys representing Tavares, and Tavares’ Companies, are Associates of BRIDGELOAN. After the initial sham loan of 2005, Tavares’ attorneys, covertly, with BRIDGELOAN and BNY Mellon, start interfering with the loan, Tavares’ investors and partners, systematically devaluing Tavares’ properties securing the sham loan, and intentionally causing the sham loan into default so BRIDGELOAN, BNY Mellon, and Associates using their Florida Bar licenses as guise to deprive and extort, can successfully extort Tavares’ properties in subverted Court proceedings, *e.g.*, entering null and void Final Judgements in an [unnoticed invalid staged sham Trial of April 8, 2011](#), predicated on a [sham settlement & fabricated evidence](#).

²⁸⁷ The Perpetrators, *inter alia*, Cohen, Rosenberg, Behringer Harvard, Monogram Brickell, and CCE, all received notices and uncontroversial hard evidence of the frauds showing the transfer of Tavares’ properties and rights is fraudulent and void.

COUNTS

Count 973 - 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 974 - 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 975 - 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 mail and wire to further the schemes, in violation of Title 18 U.S.C. §1346.

Count 976 - Daniel J. Rosenberg, Michael D. Cohen, Behringer Harvard Brickell Project Owner, LLC a.k.a. Behringer Harvard Multifamily REIT I, Inc., a Maryland company (Tax Id. #20-5383745) ("BEHRINGER HARVARD BRICKELL"), Monogran Residential Trust, Inc. (NYSE: MORE) ("MONOGRAM BRICKELL"), Derek J. Ramsey, Joshua A. Carper, GS Brickell Brickell Project Owner, LLC ("GREYSTAR"), Bridgeloan Investors, Inc., a Florida corp. (Tax Id. #65-0665516), Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge, Raul Marques, BANIF Securities Holdings, Ltd., a Cayman Islands company, Marco Antonio de Souza, BANIF Brickell, LLC, a Florida L.L.C. (Tax Id. None) and RIVBRIX, LLC, a Florida L.L.C. (Tax Id. None) (collectively "RIVBRIX" or "BRIDGELoAN'S CCE"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a continued underlying criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares ("Tavares") of properties and rights, under color of law in sham subverted proceedings in the in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 ("BRIDGELoAN" Case), in the [11th Judicial Circuit for Miami-Dade County, Fla.](#), electronic wires to further the scheme, in violation of, 18, U.S.C., § 1343.

Count 977 - Daniel J. Rosenberg, Michael D. Cohen, Behringer Harvard Brickell Project Owner, LLC a.k.a. Behringer Harvard Multifamily REIT I, Inc., a Maryland company (Tax Id. #20-5383745) ("BEHRINGER HARVARD BRICKELL"), Monogran Residential Trust, Inc. (NYSE: MORE) ("MONOGRAM BRICKELL"), Derek J. Ramsey, Joshua A. Carper, GS Brickell Brickell Project Owner, LLC ("GREYSTAR"), Bridgeloan Investors, Inc., a Florida corp. (Tax Id. #65-0665516), Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge, Raul Marques, BANIF Securities Holdings, Ltd., a Cayman Islands company, Marco Antonio de Souza, BANIF Brickell, LLC, a Florida L.L.C. (Tax Id. None) and RIVBRIX, LLC, a Florida L.L.C. (Tax Id. None) (collectively "RIVBRIX" or "BRIDGELoAN'S CCE"), and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a continued underlying criminal scheme depriving, stealing, and extorting U.S. citizen Charles Tavares ("Tavares") of properties and rights, under color of law in

sham subverted proceedings in the in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), a certain transfer of rights and properties through a [sham Warranty Deed](#) (“**JABIR’s SHAM DEED**”) from Jabir, LLC, a Florida L.L.C. (“JABIR”) (Tax Id. #46-1220650) to [Behringer Harvard Brickell Project Owner, LLC, a Delaware company](#) (“BEHRINGER HARVARD BRICKELL”), for two buildings, in a 28,000 SF parcel, part of the Brickell Village One, LLC and 2147 SW 8 Street, LLC’s 105,000 SF of land, containing several residential buildings (“Brickell Buildings”). At all relevant times, RIVBRIX, BEHRINGER HARVARD BRICKELL, and other Perpetrators implicated knew – and had to know that, they are dealing with extorted and stolen properties and rights of Tavares, and the record displayed in the BRIDGELOAN Case shows to any reasonable outside observer that BRIDGELOAN, BRIXRIV, and JABIR obtained Tavares’ Brickell Buildings through fraudulent means, *inter alia*, by a scheme upon the Miami Courts by officers of the court, predicated on an invalid and fraudulent settlement predicated on fabricated Power of Attorneys of Tavares’ Companies Brickell Village One, LLC and 2147 SW 8 Street, LLC (true “Lessee”), and Miami River Park Marina, Inc. (“Tavares’ Companies”), and with patently false, invalid and fraudulent Final Judgments entered in an unnoticed invalid staged sham “*Trial*” of April 8, 2011, rendering the sham Final Judgments forever null and void, and BRIXRIV’s subsequent transfers and [actions](#) furthering the scheme, forever null and void. BRIDGELOAN, BRIXRIV, JABIR, Behringer Harvard Brickell, Monogram Brickell, and GREYSTAR, known and intentional invalid and fraudulent transfers of Tavares’ properties and rights to disguise, cover up, and money launder the proceeds from the scheme, is in violation of, 18, U.S.C., § 1956 (Money Laundering).

Count 978 - At all times relevant, BRIDGELOAN, BRIXRIV, JABIR, Behringer Harvard Brickell, Monogram Brickell, and GREYSTAR, 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, conning, coercing, threatening, intimidating, depriving, and extorting U.S. citizen Charles Tavares, knowingly dealing with extorted and stolen Properties, preventing justice, covering up schemes, acts involving theft, 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 extorting Tavares in 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 979 – At all times relevant, the Perpetrators Implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically and repeatedly commit criminal acts to cover up and further a brazen scheme depriving and extorting Charles Tavares and Tavares’ Companies, upon subverted proceedings in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, further systematically depriving the State of Florida of honest services upon Florida courts, and further using [artifices to money launder the ill-gotten proceeds](#) and cover the scheme to prevent justice, in violation of, §817.155, F.S. (Fraudulent Practices).

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

COUNT	APROX. DATE	VIOLATIONS	PERPETRATORS
980	January 24, 2018	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Barbara Lagoa Richard Joseph Suarez Vance Edwin Salter Third District Court Appeal Florida The Continued Criminal Enterprise
981		§ 241 Conspiracy Against Rights &	
982		§ 242 Deprivation Rights Under Color of Law &	
983		§ 1346 Scheme/Artifice to Defraud &	
984		§ 1961 <i>et seq.</i> – RICO &	
985		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices &	
986		FLORIDA CODE OF JUDICIAL CONDUCT Violations of Canons 1, 2, and 3	

On January 24, 2018, a Panel of judges²⁸⁸ of the Third District Court of Appeal of Florida (“3rd DCA”), enters, in reckless disregard for the truth, facts, and the record, an irreconcilable Opinion in *Charles Tavares v. Bridgeloan Investors, Inc.*²⁸⁹, Case No. 3D16-2475, denying (“**Order Denying Appeal**”) Charles Tavares’ (“Tavares”) appeal of an Order from Judge Gisela Cardonne Ely²⁹⁰ (“Judge Cardonne”) (Florida Bar No. 218.154), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”) denying Tavares’ Motion to Reopen the sham (“**Sham Order Denying Reopening**”) *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Pina Dantas v. MUNB Loan Holdings, LLC*, Case No.2009-93058-CA-30 (“BRIDGELoAN” Case). The record displayed shows that, the Sham Order Denying Reopening clearly contradicts, *inter alia*, Florida Rule of Civil Procedure 1.540(b)(3) (4), the Due Process Clause under the Florida and the U.S. Constitutions, and the facts displayed in the record, clearly showing frauds upon the court by officers of the court causing the systematic deprivation and extortion of Tavares, under color of law, in subverted Miami Courts. The 3rd DCA,²⁹¹ in reckless disregard for the truth, facts and record displayed, willfully deprives Tavares of rights.

²⁸⁸ Judges Barbara Lagoa (“Judge Lagoa”), (Florida Bar No. 966.990), Richard Joseph Suarez (“Judge Suarez”) (Florida Bar No. 331.902), and Vance Edwin Salter (“Judge Salter”) (Florida Bar No. 232.981).

²⁸⁹ BRIDGELoAN is an entity used by Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“CCE” “Criminal Enterprise”) specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to reckless wealth international investors, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF.

²⁹⁰ The record shows that, Judge Lisa Sharon Walsh (“Judge Walsh”) (Florida Bar No. 964.610) presides the sham proceeding held to hear Tavares’ 3rd Motion to Reopen the Case Due to Frauds upon the Court by officers of the Court, pursuant to Florida Rule of Civil Procedure 1.540(b)(3)(4), and that Judge Cardonne signs the sham Order Denying Reopening the Case.

²⁹¹ In December 2012, reckless corrupt Judge Allan Lester Langer (Florida Bar No. 137.828), after perpetrating systematic illegal acts to willfully deprive and extort Tavares of \$50 million dollars in properties and rights in the sham BRIDGELoAN Case, *inter alia*, holding an unnoticed invalid sham staged “*Trial*” of April 8, 2011, entering sham void and null Judgements, is replaced by corrupt Judge Norma S. Lindsey (“Judge Lindsey”) (Florida Bar No. 994.812), willfully presiding in conflict as wife to Tavares’ opposing Party’s attorney Harold Eugene Lindsey III to prevent justice. As reward for Judge Lindsey’s crimes, Judge Lindsey is appointed, on June 19, 2017, by Governor Rick Scott, to the 3rd DCA, continuing to prevent justice and cover up schemes.

COUNTS

Count 980 - 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 981 - 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 982 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 983 - 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 984 - At all times relevant, Judges Barbara Lagoa ("Judge Lagoa"), (Florida Bar No. 966.990), Richard Joseph Suarez ("Judge Suarez") (Florida Bar No. 331.902), Vance Edwin Salter ("Judge Salter") (Florida Bar No. 232.981), Lisa Sharon Walsh ("Judge Walsh") (Florida Bar No. 964.610), Gisela Cardonne Ely ("Judge Cardonne") (Florida Bar No. 218.154), the Third District Court of Appeal Florida ("3rd DCA"), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), Matthew P. Leto, Hall Lamb and Hall, P.A., Bridgeloan Investors, Inc., Harold Eugene Lindsey III, Katz Barron Faust Squitiero, P.A., MUNB Loan Holdings, LLC, A/K/A The Bank of New York Mellon ("BNY Mellon"), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares ("Tavares"), and Tavares' Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, obstructing justice, 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 985 - Judges Barbara Lagoa (“Judge Lagoa”), (Florida Bar No. 966.990), Richard Joseph Suarez (“Judge Suarez”) (Florida Bar No. 331.902), Vance Edwin Salter (“Judge Salter”) (Florida Bar No. 232.981), Lisa Sharon Walsh (“Judge Walsh”) (Florida Bar No. 964.610), Gisela Cardonne Ely (“Judge Cardonne”) (Florida Bar No. 218.154), the Third District Court of Appeal Florida (“3rd DCA”), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), Matthew P. Leto, Hall Lamb and Hall, P.A., Bridgeloan Investors, Inc., Harold Eugene Lindsey III, Katz Barron Faust Squitiero, P.A., MUNB Loan Holdings, LLC, A/K/A The Bank of New York Mellon (“BNY Mellon”), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares (“Tavares”), and Tavares’ Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against, *inter alia*, the State of Florida, money laundering of illicit funds, obstructing justice, 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 Florida, and further depriving the State of Florida of honest services upon courts of law in Florida, in violation of, §817.155, F.S. (Fraudulent Practices).

Count 986 – Judges Barbara Lagoa (“Judge Lagoa”), (Florida Bar No. 966.990), Richard Joseph Suarez (“Judge Suarez”) (Florida Bar No. 331.902), Vance Edwin Salter (“Judge Salter”) (Florida Bar No. 232.981), Lisa Sharon Walsh (“Judge Walsh”) (Florida Bar No. 964.610), Gisela Cardonne Ely (“Judge Cardonne”) (Florida Bar No. 218.154), and other officers of the court implicated, did knowingly and intentionally, with conflict of interests, 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 U.S. Citizen Charles Tavares’ (“Tavares”) constitutionally guaranteed rights, due process, by systematically holding and presiding sham hearings, proceedings, sham trials, obstructing justice, and entering sham invalid and fraudulent Orders 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. §1341, Title 18 U.S.C. §1343, Title 18 U.S.C. §1344, Title 18 U.S.C. §1349, in violation of, Florida Judicial Code of Conduct, Canons 1, 2, & 3. See Fla. Code Jud. Conduct.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

987	From at Least in or Around 2018 Through in or Around 2019	<u>U. S. CODE TITLE 18</u>	Clerk John Anthony Tomasino Florida Supreme Court The Criminal Enterprise (CCE)
988		§ 371 Conspiracy to Defraud the USA &	
989		§ 241 Conspiracy Against Rights &	
990		§ 242 Deprivation of Rights -Under Color of Law &	
991		§ 1346 Scheme/Artifice to Defraud &	
992		§ 1961 <i>et seq.</i> – RICO & FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

Between 2018 and 2019, the Florida Supreme Court willfully perpetrates artifices to obstruct justice²⁹² and further an underlying criminal scheme depriving and extorting²⁹³ U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, by Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise (“BRIDGELOAN” or “CCE”),²⁹⁴ together with Associates and corrupt officers of the courts. The underlying scheme begins with the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. Romulo Dantas v. MUNB Loan Holdings, LLC a.k.a. The Bank of New York Mellon*, Case No.2009-93058-CA-30 (“BRIDGELOAN Case”), predicted on sham loans by BRIDGELOAN and The Bank of New York Mellon (“BNY Mellon”), intentionally caused into default by the CCE’s torts, to deprive and extort Tavares and Tavares’ Companies of more than \$50 million dollars in properties and rights, under color of law, in subverted proceedings²⁹⁵ upon Florida courts. At all relevant times, Clerk John Anthony Tomasino (“Clerk Tomasino”) (Florida Bar No. 106.021) and the Florida Supreme Court, know the schemes upon the courts, knowingly and intentionally furthering the scheme, by, *inter alia*, repeatedly fraudulently adjudicating two fabricated [Florida Supreme Court Cases](#) to obstruct justice.

²⁹² See, the falsely and fraudulently filed, docketed, and adjudicated [Florida Supreme Court Appeals](#), *Charles Tavares v. Bridgeloan Investors, Inc.*, Case SC18-435; and, *Charles Tavares v. Brickell Commerce Plaza, Inc., et al.*, Case SC18-2148, never filed by Tavares, and never authorized to be filed by Tavares. The fraudulently adjudicated Florida Supreme Court cases show, *inter alia*, the CCE’s evil powers over all Florida courts.

²⁹³ See, other sham Related Cases extorting Tavares by the CCE upon *Kangaroo Courts in the subverted courts in the Eleventh Judicial Circuit for Miami-Dade County, Florida*; *BNY Mellon v. Charles Tavares*, Case No.2010-26864-CA-30; *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No.2011-29624-CA-30; *Geania A. Fraga v. Charles Tavares*, Case No.2012-3753-FC-04; *Deutsche Bank v. Charles Tavares*, Case No. 2012-20197-30; *Markowitz Ringel Trusty & Hartog v. Miami River Park Marina, Inc. v. BRIXRIV, LLC*; *Geania A. Fraga v. Charles Tavares*, Case No. 2012-24483-FC-04 (the sham “Double-Jeopardy” Fraga II); *Charles Tavares v. Thomas R. Lehman & LKLS+G*, Case No, 2013-12223-CA-01; and, *139TH Avenue S.W. 8TH Street, LLC v. Charles Tavares (“139 TH”)*, Case No. 2018-29700-CA-04. See Record.

²⁹⁴ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) CCE, specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, joined together by BANIF Bank’s (“BANIF”) corrupt executives and attorneys that hijacked BANIF, and other Criminal Enterprises.

²⁹⁵ In the BRIDGELOAN Case, Tavares’ attorneys Levine Kellogg Lehman Schneider + Grossman, LLP and Black Srebnick Kornspan & Stumpf, P.A., together with opposing counsels, fabricate false and fraudulent Power of Attorneys of Tavares’ Companies, fraudulently settling the case against client Tavares’ orders not to settle, further threatening and coercing Tavares not to fight the extortion, and causing corrupt presiding Judge Allan Lester Langer (“Judge Langer”) to, in an [unnoticed and invalid sham staged “Trial” of April 8, 2011](#), to enter sham null and void Final Judgments against Tavares. In October 2012, after Tavares’ new attorneys Buchanan Ingersoll & Rooney, PC file a [Motion to Reopen the Case](#), they are successfully threatened and coerced to withdraw. Upon Judge Langer’s retirement in December 2012, the CCE causes corrupt Judge Norma S. Lindsey, wife to implicated attorney Harold Eugene Lindsey III, to preside in a fatal conflict of interest, Tavares’ four Related Cases, the Bridgeloan Case, the BNY Mellon Case, the BCP Case, and the Deutsch Bank Cause, to, *inter alia*, obstruct justice and cover up the schemes.

COUNTS

Count 987 - 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 988 - 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 989 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 990 - 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 991 - At all times relevant, the Clerk of the Florida Supreme Court John Anthony Tomasino ("Clerk Tomasino") (Florida Bar No. Florida Bar No. 106.021), the Florida Supreme Court, Judges Barbara Lagoa ("Judge Lagoa"), (Florida Bar No. 966.990), Richard Joseph Suarez ("Judge Suarez") (Florida Bar No. 331.902), Vance Edwin Salter ("Judge Salter") (Florida Bar No. 232.981), Lisa Sharon Walsh ("Judge Walsh") (Florida Bar No. 964.610), Gisela Cardonne Ely ("Judge Cardonne") (Florida Bar No. 218.154), the Third District Court of Appeal Florida ("3rd DCA"), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida ("Miami Courts"), Matthew P. Leto, Hall Lamb and Hall, P.A., Bridgeloan Investors, Inc., Harold Eugene Lindsey III, Katz Barron Faust Squitero, P.A., MUNB Loan Holdings, LLC, A/K/A The Bank of New York Mellon ("BNY Mellon"), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares ("Tavares"), and Tavares' Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, perjury, fabricating and filing false documents and Affidavits, knowingly and willfully conspired to commit wire fraud and committed interstate and foreign travel and transportation in aid of racketeering enterprises, influencing witnesses, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, money laundering of illicit funds, obstructing justice, 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 992 - the Clerk of the Florida Supreme Court John Anthony Tomasino (“Clerk Tomasino”) (Florida Bar No. Florida Bar No. 106.021), The Florida Supreme Court, Judges Barbara Lagoa (“Judge Lagoa”), (Florida Bar No. 966.990), Richard Joseph Suarez (“Judge Suarez”) (Florida Bar No. 331.902), Vance Edwin Salter (“Judge Salter”) (Florida Bar No. 232.981), Lisa Sharon Walsh (“Judge Walsh”) (Florida Bar No. 964.610), Gisela Cardonne Ely (“Judge Cardonne”) (Florida Bar No. 218.154), the Third District Court of Appeal Florida (“3rd DCA”), the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (“Miami Courts”), Matthew P. Leto, Hall Lamb and Hall, P.A., Bridgeloan Investors, Inc., Harold Eugene Lindsey III, Katz Barron Faust Squitero, P.A., MUNB Loan Holdings, LLC, A/K/A The Bank of New York Mellon (“BNY Mellon”), 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, systematically holding sham hearings and proceedings, entering sham Orders to deprive and extort U.S. citizen Charles Tavares (“Tavares”), and Tavares’ Companies, influencing witnesses and other officers of the courts, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against, *inter alia*, the State of Florida, money laundering of illicit funds, obstructing justice, 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 Florida, and further depriving the State of Florida of honest services upon courts of law in Florida, in violation of, §817.155, F.S. (Fraudulent Practices).

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

993	From at Least on or Around August 5, 2003 Through in or Around 2024 and Continuing	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the USA & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights Under Color of Law & § 1346 Scheme/Artifice to Defraud & § 1957 – Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity & § 1956 Money Laundering & § 1961 <i>et seq.</i> – RICO & <u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices	Nelson Slosbergas Marco Emilio Rojas Peter Francis Valori Russell Marc Landy Amanda Lara Fernandez Gabriela M. M. Guimaraes Joao Evangelista C. Tenorio Maria Fernanda B. Vilela Hugo Barreto Del Priore Steven Carlyle Cronig Hinshaw & Culbertson Law, LLP Wolters Kluwer N.V. Ernesto Pereira Lopes Rubens Menin Teixeira Souza RESIA, LLC Carlos Manuel Guzman Miami Courts Norma Shepard Lindsey 3rd DCA of Florida The Criminal Enterprise (CCE)
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On August 5, 2003, Charles Tavares (“Tavares”) founds²⁹⁶ his company 139TH Avenue SW 8 Street, LLC, a Florida L.L.C. (“139 TH”) (Tax Id. #65-1202-407), to buy and develop a certain 29 Acres Property in Miami, FL (“Property”). Unknown to Tavares at the time, Tavares’ attorneys,²⁹⁷ *inter alia*, [Marco E. Rojas](#) (“Rojas”) (Florida Bar No. 940.453) and [Nicholas Stanham](#) (“Stanham”) are Associates of [Joseph Horn’s](#) (“Horn”) Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise²⁹⁸ (“CCE” or “Criminal Enterprise”). At all relevant times, Rojas, and other Associates of the CCE,²⁹⁹ systematically and repeatedly commit torts, undermining and sabotaging Tavares’ management of 139 TH, interfering with transactions preventing *bona fide* deals, spreading false rumors about Tavares and 139 TH, coercing and extorting Tavares and Tavares’ investors. Finally, after failed attempts to extort Tavares to sell 139 TH’s Property cheap to Associates Lopes and Ruben Menin’s AHS Residential, LLC n.k.a. RESIAL, LLC, the CCE repeats Related schemes fabricating sham corporate resolutions, filing a sham [Case No. 2018-29700-CA-04](#) (“139 TH Case”) to, again, deprive and extort Tavares in subverted proceedings upon Florida courts

²⁹⁶ At all times before BRIDGELoAN’s Criminal Enterprise and its Associates hijacked Tavares’ 139 TH in October 2018, Tavares is the sole manager, president, director, and a shareholder. In October 2012, as part of a settlement in the *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No. 2011-29624-CA-30 in the 11th Judicial Circuit for Miami-Dade County, Florida (“Miami Courts”), Tavares becomes the sole majority Shareholder of Tavares’ 139 TH with a 52% interest.

²⁹⁷ To further the scheme, Tavares’ attorneys, in a fatal conflict of interest, represent Tavares and other partners in the same deal, also represent 139 TH, and also take a [3% interest](#) on 139 TH to, *inter alia*, systematically interfere in the business.

²⁹⁸ [BRIDGELoAN](#) is an entity used by Horn’s CCE, specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and attorneys, among others, [Hugo Barreto Del Priore](#) (“Del Priore”), that hijacked BANIF, and offshoots of [ODEBRECHT](#), *e.g.*, [Ernesto Pereira Lopes](#) (“Lopes”), and AHS Residential, LLC N/K/A [Resia, LLC](#) (“RESIA”), a company owned by Lopes and [Rubens Menin Teixeira de Souza](#) (“Rubens Menin”). Menin is also owner of, *inter alia*, [MRV Engenharia](#) (Brazil) (“MRV”).

²⁹⁹ Among others, Gabriela Maranhao Machado Guimaraes (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), Stephen A. Freeman, Stanham, Peter F. Valori, Amanda Lara Fernandez, Russell M. Landy, Nelson Slosbergas, Del Priore, Steven Carlyle Cronig (“Cronig”), Wolters Kluwer, and Lopes.

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

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

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

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

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

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

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

COUNTS

Count 993 - 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 994 - 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 995 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 996 - 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 997 - At all times relevant, Marco Emilio Rojas, Stephen Ames Feeman, Nicholas Stanham, Nelson Slosbergas, Peter F. Valori, Russell Marc Landy, Amanda Lara Fernandez, Gabriela Maranhao Machado Guimaraes, Joao Evangelista da Costa Tenorio, Maria Fernanda Brandao Vilela, Hugo Barreto Del Priore, Steven Carlyle Cronig, Hinshaw & Culbertson, LLP, Wolters Kluwer N.V. (AMS Stock Exchange: WKL) A/K/A/ CT Corporate Services (collectively "Wolters Kluwer"), Fernando Menendez Montes, Ernesto Pereira Lopez, Rubens Menin Teixeira de Souza, RESIA, LLC, Daniel Joseph Marzano (Florida Bar No.189.804), Nelson Varona, Sr., N.V. Sand Group, Inc., a Florida corp., 137 AVE SW 8TH ST Holdings, LLC, a Florida L.L.C., and other Perpetrators implicated, knew, and had to know that they were all engaging in repeated monetary transactions for Charles Tavares' ("Tavares") 139 TH's 29 Acres Property and rights, extorted and stolen in sham proceedings in the sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 ("139 TH Sham Case"), *see* Sham Deeds: (i) a **\$15,125,000** sham transfer Recorded on May 18, 2022, from 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (Tax Id. #65-1202407) to NV Sand Gorup, Inc., a Florida corp. (Tax Id. #87-1122591), CFN#2022R0402953 [Deed Sham Transfer 1](#); (ii) a **\$100** sham transfer, Recorded on May 18, 2022, from NV Sand Gorup, Inc., a Florida corp. (Tax Id. #87-1122591) to 137 AVE 8th ST Holdings, LLC, a Florida L.L.C. (Tax Id. #88-1378066), CFN#2022R0402954 [Deed Sham Transfer 2](#); (iii) a **\$0** sham transfer Recorded on June 23, 2022, from NV Sand Gorup, Inc., a Florida corp. (Tax Id. #87-1122591) to 137 AVE 8th ST Holdings, LLC, a Florida L.L.C. (Tax Id. #88-1378066), CFN#2022R0402954 [Deed Sham Transfer 3](#); and, (iv) a **\$100** sham transfer Recorded on July 20, 2022, from NV Sand Gorup, Inc., a Florida corp. (Tax Id. #87-1122591) to 137 AVE 8th ST Holdings, LLC, a Florida L.L.C. (Tax Id. #88-1378066), CFN#2022R0580169 [Deed Sham Transfer 4](#), knowingly and intentionally engaging in monetary transactions in Property derived from specified unlawful activity, in violation of, Title 18 U.S.C. §1957.

Count 998 - At all times relevant, Marco Emilio Rojas, Stephen Ames Feeman, Nicholas Stanham, Nelson Slosbergas, Peter F. Valori, Russell Marc Landy, Amanda Lara Fernandez, Gabriela Maranhao Machado Guimaraes, Joao Evangelista da Costa Tenorio, Maria Fernanda Brandao Vilela, Hugo Barreto Del Priore, Steven Carlyle Cronig, Hinshaw & Culbertson, LLP, Wolters Kluwer N.V. (AMS Stock Exchange: WKL) A/K/A/ CT Corporate Services (collectively "Wolters Kluwer"), Fernando Menendez Montes, Ernesto Pereira Lopez, Rubens Menin Teixeira de Souza, RESIA, LLC, Daniel Joseph Marzano (Florida Bar No.189.804), Nelson Varona, Sr., N.V. Sand Group, Inc., a Florida corp., 137 AVE SW 8TH ST Holdings, LLC, a Florida L.L.C., and other Perpetrators implicated, knew, and had to know that they were all engaging in repeated monetary transactions for Charles Tavares' ("Tavares") 139 TH's 29 Acres Property and rights, extorted and stolen in sham proceedings in the sham styled-action *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 ("139 TH Sham Case"), see Sham Deeds: (i) a **\$15,125,000** sham transfer Recorded on May 18, 2022, from 139 TH Avenue SW 8 Street, LLC, a Florida L.L.C. (Tax Id. #65-1202407) to NV Sand Gorup, Inc., a Florida corp. (Tax Id. #87-1122591), CFN#2022R0402953 [Deed Sham Transfer 1](#); (ii) a **\$100** sham transfer, Recorded on May 18, 2022, from NV Sand Gorup, Inc., a Florida corp. (Tax Id. #87-1122591) to 137 AVE 8th ST Holdings, LLC, a Florida L.L.C. (Tax Id. #88-1378066), CFN#2022R0402954 [Deed Sham Transfer 2](#); (iii) a **\$0** sham transfer Recorded on June 23, 2022, from NV Sand Gorup, Inc., a Florida corp. (Tax Id. #87-1122591) to 137 AVE 8th ST Holdings, LLC, a Florida L.L.C. (Tax Id. #88-1378066), CFN#2022R0402954 [Deed Sham Transfer 3](#); and, (iv) a **\$100** sham transfer Recorded on July 20, 2022, from NV Sand Gorup, Inc., a Florida corp. (Tax Id. #87-1122591) to 137 AVE 8th ST Holdings, LLC, a Florida L.L.C. (Tax Id. #88-1378066), CFN#2022R0580169 [Deed Sham Transfer 4](#), knowingly and intentionally engaging in monetary transactions in Property derived from specified unlawful activity, further money laundering the ill-gotten proceeds, in violation of, Title 18 U.S.C. §1956 (Laundering Monetary Instruments).

Count 999 - At all times relevant, Marco Emilio Rojas, Stephen Ames Feeman, Nicholas Stanham, Nelson Slosbergas, Peter F. Valori, Russell Marc Landy, Amanda Lara Fernandez, Gabriela Maranhao Machado Guimaraes, Joao Evangelista da Costa Tenorio, Maria Fernanda Brandao Vilela, Hugo Barreto Del Priore, Steven Carlyle Cronig, Hinshaw & Culbertson, LLP, Wolters Kluwer N.V. (AMS Stock Exchange: WKL) A/K/A/ CT Corporate Services (collectively "Wolters Kluwer"), Fernando Menendez Montes, Ernesto Pereira Lopez, Rubens Menin Teixeira de Souza, RESIA, LLC, Daniel Joseph Marzano (Florida Bar No.189.804), Nelson Varona, Sr., N.V. Sand Group, Inc., a Florida corp., 137 AVE SW 8TH ST Holdings, LLC, a Florida L.L.C., 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, knowingly and willfully conspired to commit wire fraud and committed interstate and foreign travel and transportation in aid of racketeering enterprises, influencing witnesses, coercing, extorting, acts involving theft, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, engaging in monetary transactions in Property derived from specified unlawful activity, 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 1000 – Marco Emilio Rojas, Stephen Ames Feeman, Nicholas Stanham, Nelson Slosbergas, Peter F. Valori, Russell Marc Landy, Amanda Lara Fernandez, Gabriela Maranhao Machado Guimaraes, Joao Evangelista da Costa Tenorio, Maria Fernanda Brandao Vilela, Hugo Barreto Del Priore, Steven Carlyle Cronig, Hinshaw & Culbertson, LLP, Wolters Kluwer N.V. (AMS Stock Exchange: WKL) A/K/A/ CT Corporate Services (collectively “Wolters Kluwer”), Ernesto Pereira Lopez, Rubens Menin Teixeira de Souza, RESIA, LLC, Daniel Joseph Marzano (Florida Bar No.189.804), Nelson Varona, Sr., N.V. Sand Group, Inc., a Florida corp., 137 AVE SW 8TH ST Holdings, LLC, a Florida L.L.C., and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, *inter alia*, dealing with Charles Tavares’ (“Tavares”) stolen properties, 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

1001	August 13, 2020	U. S. CODE TITLE 18	Olten Ayres de Abreu Junior Romulo Pina Dantas Marcos Jose Bezerra Menezes Gabriela M. Ruiz Andrew C. Lourie Kobre & Kim LLP The Criminal Enterprise (CCE)
1002		§ 371 Conspiracy to Defraud the USA &	
1003		§ 241 Conspiracy Against Rights &	
1004		§ 242 Deprivation of Rights Under Color of Law &	
1005		§ 1346 Scheme/Artifice to Defraud &	
1006		§ 1343 Wire Fraud &	
1007		§ 1961 <i>et seq.</i> – RICO & FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

On August 13, 2020, Olten Ayres de Abreu Junior (“Abreu Jr.”), a transnational criminal and fixer,³⁰⁰ to coerce, extort, and prevent justice, files³⁰¹ with unclean hands, a patently sham Motion to, *inter alia*, obstruct justice and cover up a successful scheme subverting Florida courts, depriving and extorting U.S. citizen and victim Charles Tavares (“Tavares”) of more than \$50 million dollars and rights in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), and in other sham Related Cases, in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”). At all relevant times, Abreu Jr., Ruiz, and Lourie, know in truth and in fact that Abreu Jr. is not an **“Innocent” “Non-Party.”** Indeed, the record displayed shows that Abreu Jr. is a shameless criminal implicated in the deprivation and extortion of Tavares, together with, among others, Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise³⁰² (“Criminal Enterprise” or “CCE”), and [Abreu Jr.’s Sham Motion](#) is an artifice by the Transnational CCE, to intimidate, [extort](#), prevent justice, covering up schemes in subverted Miami Courts, depriving and extorting the judicial machinery, law enforcement agencies, citizens, and the United States of America of honest services.

³⁰⁰ [Abreu Jr.](#) is a criminal and fixer, using, *e.g.*, his Brazilian law license ([Brazil’s OAB-SP No.75.820 & OAB-RJ No.116.844](#)), [Swiss](#) law license, and company [Abreu Jr. Advogados Corp.](#) in the Republic of Panamá for, *inter alia*, money laundering of bribery and corruption monetary instruments, extortion, tax and bank fraud schemes through the United States. See Criminal definition under Merriam-Webster Dictionary: “one who has committed a crime;” “of an illegal act for which someone can be punished by the government.” See also the Record showing Abreu Jr.’s continuous violations of State and Federal law.

³⁰¹ Abreu Jr.’s attorneys, Gabriela M. Ruiz (“Ruiz”) (Florida Bar No. 46.844) and Andrew C. Lourie (“Lourie”) (Florida Bar No. 87.772), at Kobre & Kim LLP (“Kobre & Kim”), file, with unclean hands, after [reviewing the record displayed](#), uncontroversially showing [massive frauds upon the court](#), by, among others, Abreu Jr., subverting the Miami Courts to systematically deprive and extort Tavares, a patently sham Third-Party Olten Ayres de Abreu Jr.’s Motion to Strike [Affidavit of Charles A. Tavares](#), or, in the Alternative, to Determine the Confidentiality of Court Records Pursuant to Florida Rule of Judicial Administration 2.420(e)(1) (“[Abreu Jr.’s Sham Motion](#)”), see E-Filing #111782373, to prevent justice and cover up. See also [Tavares Response 8/20/2020](#).

³⁰² [BRIDGELoAN](#) is an entity used by Joseph Horn’s CCE, specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, providing tax, bank, and securities’ fraud schemes through the United States, joined together by [BANIF Bank’s](#) (“BANIF”) corrupt executives and attorneys, among others, [Hugo Barreto Del Priore](#) (“Del Priore”), that hijacked BANIF, and offshoots of [ODEBRECHT](#), *e.g.*, [Ernesto Pereira Lopes](#) (“Lopes”), and AHS Residential, LLC N/K/A [Resia, LLC](#) (“RESIA”), a company owned by Lopes and [Rubens Menin Teixeira de Souza](#) (“Rubens Menin”). Menin is also owner of, *inter alia*, [MRV Engenharia](#) (Brazil) (“MRV”).

COUNTS

Count 1001 - 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 1002 - 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 1003 - The Perpetrators implicated, as officers of the courts, did knowingly and intentionally systematically conspire, deprive and extort Tavares, upon subverted court proceedings, of properties and constitutionally guaranteed rights, under color of law, in violation of, Title 18 U.S.C. §242.

Count 1004 - 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 1005 – [Olten Ayres de Abreu Junior](#) (“[Abreu Jr.](#)”) at Wilhelm Avocats S.A., (“[Wilhelm](#)”), at Avenue de Rumine 13 – 1001, Lausanne, Switzerland (oabreu@wg-avocats.ch) Telephone +41 21 711 7100; Gabriela M. Ruiz (“[Ruiz](#)”) (Florida Bar No. 46.844) (gabriela.ruiz@kobrekim.com) and Andrew C. Lourie (“[Lourie](#)”) (Florida Bar No. 87.772) (Andrew.lourie@kobrekim.com), at Kobre & Kim LLP (“[Kobre & Kim](#)”) at 201 South Biscayne Boulevard, Suite 1900, Miami, Florida 33131 (all collectively “[Abreu Jr.](#)”), and other Perpetrators implicated, did knowingly and intentionally, use as an artifice to further an underlying criminal scheme, coercing, intimidating, depriving, and extorting U.S. citizen Charles Tavares (“[Tavares](#)”) of properties and rights, under color of law, certain patently sham filing *Third-Party Olten Ayres de Abreu Jr.’s Motion to Strike Affidavit of Charles A. Tavares, or, in the Alternative, to Determine the Confidentiality of Court Records Pursuant to Florida Rule of Judicial Administration 2.420(e)(1)* (“[Abreu Jr.’s Sham Motion](#)”), see E-Filing #111782373, on 08/13/2020 at 08:53:37 PM, upon the Eleventh Judicial Circuit Court in and for Miami-Dade County, Florida (“[Miami Courts](#)”), to further obstruct and prevent justice to cover up the successful scheme subverting the Miami Courts, to wit – among others, transmitting, on August 13, 2020, Via E-mail, a certain sham [Abreu Jr.’s Sham Motion](#), furthering BRIDGELOAN’S CCE underlying scheme upon the courts to: **(1005a)** “*Andrew C. Hall, Hall, Lamb, and Hall, P.A. andyhall@hlhlawfirm.com*”; **(1005b)** “*Harold Eugene Lindsey III, Katz Barron Attorney at Law, hel@katzbarron*”; **(1005c)** “*Erica L. English, Katz Barron Attorneys at Law, ele@katzbarron.com*”; **(1005d)** “*Jorge L. Fors, Fors Attorneys at Law, jfors@forslegal.com*”; **(1005e)** “*Larry A. Stumpf, Black Srebnick Kornspan & Stumpf, lstumpf@royblack.com*”; **(1005f)** “*Jared M. Lopez, Black Srebnick Kornspan & Stumpf, jlopez@royblack.com*”; **(1005g)** “*Roy Black, Black Srebnick Kornspan & Stumpf, rblack@royblack.com*”; **(1005h)** “*Thomas R. Lehman, Levine Kellogg Lehman Schneider +*

Grossman, LLP, trl@klsq.com"; (1005i) "Ramon A. Anzola-Robles, Anzola Robles & Associates, info@anzolalaw.net , rar@globcorp.net"; (1005j) "Matthew P. Leto, Hall Lamb Hall & Leto, P.A., mleto@hlhlawfirm.com"; (1005k) "Patrick J. Rengstl, Payton & Associates, rengstl@payton-law.com"; (1005l) "Gerald L. Hassell, The Bank of New York Mellon, gerald.hassell@bnymellon.com"; (1005m) "Alvin A. Narin, The Bank of New York Mellon, alvin.narin@bnymellon.com"; (1005n) "Ann Fogarty, The Bank of New York Mellon, ann.fogarty@bnymellon.com"; (1005o) "Hani Kablawi, The Bank of New York Mellon, hani.kablawi@bnymellon.com"; (1005p) "Senthil Kumar, The Bank of New York Mellon, Senthil.kumar@bnymellon.com"; (1005q) "Romulo Pina Dantas, Pandenor Importacao e Exportacao Spe Ltda., dantas@pandenor.com.br , commercial@pandenor.com.br"; (1005r) "Victoria Mendez, Office of the City Attorney [City of Miami], 444 SW 2nd Avenue, Suite 952, Miami, Florida 33130, law@miamigov.com"; (1005s) "Joseph Horn, Bridgeloan Investors, Inc. A/K/A BRIXIV, LLC and RIVBRIX, LLC, joseph@h2e.com , alex.horn@bridgeinvest.com , hdelpriore@argonpart.com.br"; (1005t) "Allan Lester Langer, Salmon & Dulberg Dispute Resolutions, l.langer@me.com , langer@sd-adr.com"; and, (1005u) "Charles A. Tavares, 245 SE 1st Street, Suite 221, Miami, Florida 33131, ctavares@bellsouth.net , charlesatavares@hotmail.com", in repeated violations of, Title 18, U.S.C., § 1343.

Count 1006 - At all times relevant, [Olten Ayres de Abreu Junior](#), Wilhelm Avocats S.A., at Avenue de Rumine 13 – 1001, Lausanne, Switzerland, Gabriela M. Ruiz (Florida Bar No. 46.844) and Andrew C. Lourie ("Lourie") (Florida Bar No. 87.772), at Kobre & Kim LLP at 201 South Biscayne Boulevard, Suite 1900, Miami, Florida 33131, 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, perjury, mail and wire frauds, bank frauds, securities frauds, crimes against the United States, engaging in monetary transactions in Property derived from specified unlawful activity, money laundering of illicit funds, bribery of officers of the court to further a scheme depriving and extorting Tavares of properties and rights, obstructing and preventing justice to cover up an underlying scheme upon sham proceedings Miami Courts, and systematic violations of rights, contrary to 18 U.S.C. §1961 *et seq.* See, [Tavares Response Filing 8/20/2020 to Abreu Jr.'s Sham Motion](#), and [Tavares Sworn Affidavit](#).

Count 1007 – [Olten Ayres de Abreu Junior](#), Wilhelm Avocats S.A., at Avenue de Rumine 13 – 1001, Lausanne, Switzerland, Gabriela M. Ruiz (Florida Bar No. 46.844) and Andrew C. Lourie ("Lourie") (Florida Bar No. 87.772), at Kobre & Kim LLP at 201 S. Biscayne Blvd, Suite 1900, Miami, FL 33131, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, *inter alia*, knowingly and intentionally submitting and transmitting [Abreu Jr.'s Sham Motion](#), upon Miami Courts, that the [Record displayed shows](#), and they all know in truth and in fact to be false and fraudulent, to further an underlying scheme coercing, and extorting U. S. citizen Charles Tavares, obstructing and preventing justice, under color of law, to further a scheme upon the Miami Courts, systematically depriving the State of Florida and the United States of America, 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
1008	June 30, 2021	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Pedro Mantilla Juan Carlos Mantilla Ricardo Mantilla
1009		§ 241 Conspiracy Against Rights &	2000 Coral Group, LLC Coral Group Property Advisors, Inc
1010		§ 1346 Scheme/Artifice to Defraud &	Sonia Y. Marrero Lazaro Jose Diaz
1011		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	Tricon Group Holdings, LLC The Continued Criminal Enterprise
1012		§ 1956 Laundering of Monetary Instruments &	
1013		§ 1343 Electronic Wire Fraud &	
1014		§ 1961 <i>et seq.</i> – RICO &	
		FLORIDA STATUTES	
1015		Title XLVI § 817.155 Fraudulent Practices	

On June 30, 2021, Pedro Mantilla, Juan Carlos Mantilla, Ricardo Mantilla, and 2000 Coral Group LLC, a Florida L.L.C. (collectively “Mantilla ”), in furtherance of a continued underlying scheme by Bridgeloan Investors, Inc.’s (“BRIDGELoAN”) Transnational Continued Criminal Enterprise³⁰³ (“Criminal Enterprise” or “CCE”), together with other Perpetrators implicated, continuously depriving and extorting U.S. citizen and victim Charles Tavares (“Tavares”) of properties and rights, under color of law, upon subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELoAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”), executes a sham [Deed](#) (“**Sham Warranty Deed Parcel 4**”) for part of Tavares’ 9 Acres Miami River Marina Property (“Tavares’ Property”) owned³⁰⁴ by Tavares’ Company Miami River Park Marina, Inc. (“MRPM”) to Tricon Group Holdings, LLC, a Florida L.L.C.³⁰⁵ (“TRICON”) (Tax Id. #”*Applied for*”). At all relevant times, the Perpetrators know – and the record shows, they are knowingly and intentionally dealing with Tavares’ extorted Property and rights, further money laundering the ill-gotten proceeds.

³⁰³ RIVBRIX, LLC, a Florida L.L.C. (“RIVBRIX”), is another entity used for money laundering and tax frauds by BRIDGELoAN’s CCE, led by Joseph Horn (“Horn”), Ralph Horn (“Horn”), Ricardo Eichenwald (“Eichenwald”), Fernando Braghin (“Braghin”), Daniel Ades (“Ades”), and Nelson Slosbergas, together with Associate BANIF Securities Holdings, Ltd., a Cayman Islands company and BANIF Miami River, LLC, a Florida L.L.C. (collectively “BANIF”), led by, *inter alia*, Carlos Eduardo Pais e Jorge a.k.a. C. Pais Jorge (“Carlos Pais Jorge”), Raul Marques (“Marques”), Marco Antonio de Souza (“De Souza”), and Pedro Serzedelo (“Serzedelo”).

³⁰⁴ On April 8, 2011, BRIDGELoAN’s CCE, with corrupt officers of the court, stage a sham unnoticed and invalid “*Trial*”, for corrupt Judge Allan Lester Langer, to knowingly and intentionally, enter two fraudulent and invalid Final Judgments, predicated on a sham settlement, fraudulently fabricated by Tavares’ attorneys Levine Kellogg Lehman Schneider + Grossman, LLP and Black Srebnick Kornspan & Stumpf, P.A. (“Black Srebnick”), conspiring together with, *inter alia*, opposing counsels Hall, Lamb, Hall, P.A. (Hall & Lamb”), and Katz Barron Faust Squitero (“Katz Barron”), fraudulently and invalidly depriving and extorting Tavares of Tavares’ Property, rendering the invalid and fraudulent Final Judgements, and future transfers, forever null and void.

³⁰⁵ See Lazaro Jose Diaz’s TRICON purchase Parcel 4 for \$250,000 (\$50 SF), money laundering the proceeds from Mantilla and BRIDGELoAN/RIVBRIX’s extortion of Tavares upon subverted Miami Courts, see Miami Clerk Records at [CFN 2021R0510905](#).

COUNTS

Count 1008 - 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 1009 - 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 1010 - 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 1011 – At all times relevant, Pedro Mantilla, Juan Carlos Mantilla, Ricardo Mantilla, Coral Group Property Advisors, Inc., a Florida corp., and 2000 Coral Gorup, LLC, a Florida L.L.C. (all collectively “**Mantilla**”), Lazaro Jose Diaz, Sonia Y. Marrero, Tricon Group Holdings, LLC (collectively “TRICON”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), see **(i)** CFN#2013R0416072, May 17, 2013 Sham Deed Transfer Parcel 4 for \$50,000 for 10,000 SF of land (\$5.00 SF) from RIVBRIX (No Tax Id.) to Mantilla (Tax Id. #46-1968325); see **(ii)** CFN# 2015R0670213, September 28, 2015 Sham Quit Claim Deed Transfer Parcel 4 for \$56,800 for 10,000 SF of land (\$5.68 SF) from Mantilla’s Coral Group Property Advisors, Inc. to Mantilla’s 2000 Coral Group, LLC; and **(iii)** CFN# 2021R0510905, June 30, 2021 Sham Warranty Deed Transfer Parcel 4 for \$250,000 for 10,000 SF of land (\$25.00 SF) from Mantilla’s 2000 Coral Group, LLC to Lazaro Jose Diaz’s Tricon Group Holdings, LLC. The record displayed shows a brazen underlying scheme depriving and [extorting Tavares’](#) Miami River Marina Property, in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer, and Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitero, and further showing the Perpetrators’ conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a [sham late Notice of April 8, 2011](#), hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares’ Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares’ Properties, *inter alia*, Bridgeloan Investors, Inc. (“BRIDGELoAN”), to RIVBRIX, the following sham transfer from RIVBRIX to Mantilla, from Mantilla to Mantilla, and from Mantilla to TRICON, knowingly dealing with stolen properties, is forever null and void, and in violation of, Title 18 U.S.C., § 1957.

Count 1012 – At all times relevant, Pedro Mantilla, Juan Carlos Mantilla, Ricardo Mantilla, Coral Group Property Advisors, Inc., a Florida corp., and 2000 Coral Gorup, LLC, a Florida L.L.C. (all collectively “**Mantilla**”), Lazaro Jose Diaz, Sonia Y. Marrero, Tricon Group Holdings, LLC (collectively “TRICON”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) extorted and stolen Miami River Park Marina, Inc.’s Property (“Miami River Marina Property”), *see (i)* CFN#2013R0416072, May 17, 2013 Sham Deed Transfer Parcel 4 for \$50,000 for 10,000 SF land (\$5.00 SF) from RIVBRIX (No Tax Id.) to Mantilla (Tax Id. #46-1968325); *see (ii)* CFN# 2015R0670213, September 28, 2015 Sham Quit Claim Deed Transfer Parcel 4 for \$56,800 for 10,000 SF of land (\$5.68 SF) from Mantilla’s Coral Group Property Advisors, Inc. to Mantilla’s 2000 Coral Group, LLC; and *(iii)* CFN# 2021R0510905, June 30, 2021 Sham Warranty Deed Transfer Parcel 4 for \$250,000 for 10,000 SF of land (\$25.00 SF) from Mantilla’s 2000 Coral Group, LLC to Lazaro Jose Diaz’s Tricon Group Holdings, LLC. The record displayed shows a brazen underlying scheme depriving and extorting Tavares’ Miami River Marina Property, in an unnoticed and invalid staged sham Trial of April 8, 2011, staged by officers of the courts, *inter alia*, corrupt Judge Allan Lester Langer, and Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitero, and further showing the Perpetrators’ conscious of guilt and attempt to cover up the invalid and sham staged Trial, by filing a [sham late Notice of April 8, 2011](#), hours after the null and void Final Judgments are entered to deprive and extort Tavares of Tavares’ Properties. The record shows that the Final Judgments are patently false, invalid, and fraudulent, and the transfer, forever null and void, of Tavares’ Properties, *inter alia*, Bridgeloan Investors, Inc. (“BRIDGELoAN”), to RIVBRIX, the following sham transfer from RIVBRIX to Mantilla, from Mantilla to Mantilla, and from Mantilla to TRICON, knowingly dealing with stolen properties, is forever null and void, money laundering the proceeds of the scheme, in violation of, Title 18 U.S.C. §1956 (Laundering of Monetary Instruments).

Count 1013 – Pedro Mantilla, Juan Carlos Mantilla, Ricardo Mantilla, Coral Group Property Advisors, Inc., a Florida corp., 2000 Coral Gorup, LLC, a Florida L.L.C. (collectively “**Mantilla**”), Lazaro Jose Diaz, Sonia Y. Marrero, Tricon Group Holdings, LLC (collectively “TRICON”), RIVBRIX, LLC, and other Perpetrators implicated, did knowingly and intentionally, use, as an artifice to further a criminal scheme depriving, stealing, and extorting Charles Tavares of properties and rights, under color of law, and further, *inter alia*, fraudulently transferring the stolen properties and money laundering the ill-gotten proceeds, Electronic Wires, in violation of, Title 18, U.S.C., § 1343.

Count 1014 - At all times relevant, Pedro Mantilla, Juan Carlos Mantilla, Ricardo Mantilla, Coral Group Property Advisors, Inc., a Florida corp., 2000 Coral Gorup, LLC, a Florida L.L.C. (collectively “**Mantilla**”), Lazaro Jose Diaz, Sonia Y. Marrero, Tricon Group Holdings, LLC (collectively “TRICON”), RIVBRIX, LLC, 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, dealing with extorted Properties and rights of Charles Tavares (“Tavares”) and Tavares’ Companies, repeatedly fabricating and filing multiple sham Warranty Deeds for Tavares’ extorted and stolen Properties,

influencing witnesses, coercing, extorting, acts involving theft, 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 1015 – Pedro Mantilla, Juan Carlos Mantilla, Ricardo Mantilla, Coral Group Property Advisors, Inc., a Florida corp., 2000 Coral Gorup, LLC, a Florida L.L.C. (collectively “**Mantilla**”), Lazaro Jose Diaz, Sonia Y. Marrero, Tricon Group Holdings, LLC (collectively “TRICON”), RIVBRIX, LLC, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, *inter alia*, dealing with Charles Tavares’ (“Tavares”) stolen properties, repeatedly fabricating and filing multiple sham Warranty Deeds for Tavares’ extorted and 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
1016	From July 21, 2005 Through August 13, 2020, and Continuing to This Date	U. S. CODE TITLE 18 § 371 Conspiracy to Defraud the USA &	Gerald L. Hassell Alvin A. Narin Ann Fogarty
1017		§ 241 Conspiracy Against Rights &	Hani Kablawi Senthil Kumar
1018		§ 1346 Scheme/Artifice to Defraud &	Charles W. Scharf Pedro Gomez
1019		§ 1343 Wire Fraud &	Roberto A. Pedroso David P. Applebaum
1020		§ 1344 Bank Frauds &	Barbara J. Parrish The Bank of New York Mellon
1021		§ 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity &	Erica Lee English Harold Eugene Lindsey III
1022		§ 1956 Laundering of Monetary Instruments &	Katz Barron Faust Squitiero The Continued Criminal Enterprise
1023		§ 1961 <i>et seq.</i> – RICO &	
1024		FLORIDA STATUTES Title XLVI § 817.155 Fraudulent Practices	

On July 21, 2005, [The Bank of New York Mellon Corp.](#) f.k.a. Mellon United National Bank a.k.a. MUNB Loan Holdings, LLC (“BNY Mellon”), together with Bridgeloan Investors, Inc.’s Transnational Continued Criminal Enterprise (“CCE” or “BRIDGELOAN”), knowingly and intentionally, provide a sham \$7 million dollars (“Sham Loan”) to U.S. citizen Charles Tavares (“Tavares”) and Tavares’ Companies to purchase a 9 Acres Miami Riverfront property in Miami, FL (“Miami River Marina Property”). At all relevant times, BNY Mellon, its representatives and agents, knew,³⁰⁶ and should have known BRIDGELOAN is a sham co-lender, and that [borrower Tavares’ attorneys](#)³⁰⁷ are Associates of BRIDGELOAN, willfully representing Tavares in fatal conflict to covertly deprive and extort Tavares of collateral properties securing the Sham Loan. On June 21, 2007, to further the scheme, BRIDGELOAN and BNY Mellon, knowingly and intentionally provide an additional loan, increasing the Sham Loan to \$12 million dollars. At all relevant times, BRIDGELOAN, BNY Mellon, and Associates, systematically interfere with the Sham Loan to cause into default so the CCE and BNY Mellon can deprive & extort Tavares, under color of law, in subverted proceedings in the sham styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo Dantas v. MUNB Loan Holdings, LLC*, Case No.2009-93058-CA-30 (“BRIDGELOAN” Case) in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”). The record displayed shows that, *inter alia*, BNY Mellon, employees, and agents knew the scheme,³⁰⁸ willfully continuing to further the scheme to this date.

³⁰⁶ BRIDGELOAN is an entity used by Joseph Horn’s (“Horn”) CCE, specialized in intercontinental money laundering, bank, mortgage, securities, & portfolio tax-free bond frauds, tax frauds, and extortion, and providing, *e.g.*, tax, bank, and securities’ fraud schemes through the United States, to, *inter alia*, reckless wealth international investors and counterparts, joined together in schemes by longtime associate BNY Mellon.

³⁰⁷ Tavares’ former attorneys, *inter alia*, Stephen Ames Freeman (Florida Bar No. 146.795), Robert Michael Haber (Florida Bar No. 131.614), Marco Emilio Rojas (Florida Bar No. 940.453), Nicholas Stanham (Florida Bar No.38.822), and Nelson Slosbergas (Florida Bar No. 378.887).

³⁰⁸ BNY Mellon, at all relevant times, participated in the Sham Loan scheme, producing sham appraisals to knowingly and intentionally devalue Tavares’ collateral properties securing the Sham Loan, with a true value at the time in excess of \$50 million dollars – and today, exceeding \$300 million dollars, allowing BRIDGELOAN to interfere with Tavares’ Companies, investors and partners funding the loan payments, spreading false rumors about Tavares, preventing *bona fide* transactions, and causing the loan into default so BNY Mellon and BRIDGELOAN could use its evil powers to deprive and extort Tavares of properties and rights, under color of law, in subverted proceedings. The record shows that [BNY Mellon agreed to a sham settlement](#), predicated on fabricated [Power of Attorneys of Tavares’ companies](#), [staging a sham unnoticed invalid “Trial” of April 8, 2011](#) to extort Tavares of properties with void [Final Judgments](#), [preventing justice](#) to cover up the schemes. See [Tavares’ Affidavit](#).

COUNTS

Count 1016 - 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 1017 - 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, U.S. Const., Amend. XIV.

Count 1018 - 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 1019 – Gerald L. Hassell, Alvin A. Narin, Ann Fogarty, Hani Kablawi, Senthil Kumar, Charles W. Scharf, Pedro Gomez, Roberto A. Pedroso, David. P. Applebaum, Barbara Parrish, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC, The Bank of New York Mellon Corp., Bridgeloan Investors, Inc., and other Perpetrators implicated, did knowingly and intentionally, use Bank Frauds and wires as artifices to further their criminal scheme depriving, stealing, and extorting Charles Tavares of properties and rights, under color of law, and further, *inter alia*, fraudulently transfers the extorted and stolen properties and rights, systematically money laundering the ill-gotten proceeds, in violation of, Title 18, U.S.C., § 1343.

Count 1020 - Gerald L. Hassell, Alvin A. Narin, Ann Fogarty, Hani Kablawi, Senthil Kumar, Charles W. Scharf, Pedro Gomez, Roberto A. Pedroso, David. P. Applebaum, Barbara Parrish, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC, The Bank of New York Mellon (all collectively referred as "BNY Mellon"), Bridgeloan Investors, Inc., and other Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to further an underlying scheme, under color of law, defrauding, among others, The Bank of New York Mellon Corp. ("BNY Mellon") (NYSE: BK), by artifices to obtain monies, credits, assets, securities, and other properties to further underlying schemes of, *inter alia*, money laundering, mortgage, bank and portfolio tax-free bond frauds, tax schemes, and in the course, systematically enabling and facilitating the deprivation and extortion of borrower and U.S. citizen Charles Tavares of properties and rights stemming from a Sham Loan by BRIDGELoan and BNY Mellon, further showing BNY Mellon and its agents and representatives repeatedly enabling and enabling the scheme depriving and extorting, *inter alia*, Charles Tavares, the United States, and BNY Mellon's Shareholders in subverted court proceedings in the styled-case *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30, in violation of, Title 18 U.S.C. §1344 (Bank Fraud).

Count 1021 – At all times relevant, Gerald L. Hassell, Alvin A. Narin, Ann Fogarty, Hani Kablawi, Senthil Kumar, Charles W. Scharf, Pedro Gomez, Roberto A. Pedroso, David. P. Applebaum, Barbara Parrish, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC, The Bank of New York Mellon (all collectively referred as “BNY Mellon”), Bridgeloan Investors, Inc., and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) certain properties and rights for the Brickell Residential Buildings (“Brickell Buildings”), and a 9 Acres Miami Riverfront Property (Miami River Marina”), deprived and extorted from Tavares with null and void Final Judgments entered on an unnoticed invalid [staged Sham Trial of April 8, 2011](#), predicated on a [falsely agreed Sham Settlement](#) predicated on false, invalid, and fraudulent Power of Attorneys of Tavares’ companies, fabricated by Tavares attorneys, together with others, *inter alia*, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Alan Samuel Fine, Olten Ayres de Abreu Junior, Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitero, BRIDGELoAN, and BNY Mellon. The record displayed further shows the shameless Perpetrators’ conscious of guilt by attempting to cover up the fact there was never a trial set for April 8, 2011, or any other date, [filing a late invalid Notice of Proceeding for April 8, 2011](#). At all relevant times the Perpetrators know that they are engaging in monetary transactions in Property derived form specified unlawful activity, in violation of, Title 18 U.S.C., § 1957.

Count 1022 – At all times relevant, Gerald L. Hassell, Alvin A. Narin, Ann Fogarty, Hani Kablawi, Senthil Kumar, Charles W. Scharf, Pedro Gomez, Roberto A. Pedroso, David. P. Applebaum, Barbara Parrish, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC, The Bank of New York Mellon (all collectively referred as “BNY Mellon”), Bridgeloan Investors, Inc. (“BRIDGELoAN”), and other Perpetrators implicated, knew, and had to know that they were all engaging in a monetary transaction for Charles Tavares’ (“Tavares”) certain properties and rights for the Brickell Residential Buildings (“Brickell Buildings”), and a 9 Acres Miami Riverfront Property (Miami River Marina”), deprived and extorted from Tavares with null and void Final Judgments entered on an unnoticed invalid [staged Sham Trial of April 8, 2011](#), predicated on a [falsely agreed Sham Settlement](#) predicated on false, invalid, and fraudulent Power of Attorneys of Tavares’ companies, fabricated by Tavares attorneys, together with others, *inter alia*, Thomas Ralph Lehman, Levine Kellogg Lehman Schneider + Grossman, LLP, Larry Allen Stumpf, Jared Michael Lopez, Black Srebnick Kornspan & Stumpf, P.A., Alan Samuel Fine, Olten Ayres de Abreu Junior, Matthew Paul Leto, Hall Lamb and Hall, P.A., Erica Lee English, and Katz Barron Faust Squitero, BRIDGELoAN, and BNY Mellon. The record displayed further shows the shameless Perpetrators’ conscious of guilt by attempting to cover up the fact there was never a trial set for April 8, 2011, or any other date, [filing a late invalid Notice of Proceeding for April 8, 2011](#). At all relevant times the Perpetrators know that they are engaging in monetary transactions in Property derived form specified unlawful activity, money laundering the proceeds of the scheme, in violation of, Title 18 U.S.C. §1956 (Laundering of Monetary Instruments).

Count 1023 - At all times relevant, Gerald L. Hassell, Alvin A. Narin, Ann Fogarty, Hani Kablawi, Senthil Kumar, Charles W. Scharf, Pedro Gomez, Roberto A. Pedroso, David. P. Applebaum, Barbara Parrish, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC, The Bank of New York Mellon (all collectively “BNY Mellon”), BRIDGELoAN, 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, staging sham proceedings and trial to deprive and extort, entering in patently false, invalid and fraudulent a settlement to defraud Charles Tavares (“Tavares”) of properties and rights, influencing witnesses, coercing, extorting,³⁰⁹ acts involving theft, 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 1024 – Gerald L. Hassell, Alvin A. Narin, Ann Fogarty, Hani Kablawi, Senthil Kumar, Charles W. Scharf, Pedro Gomez, Roberto A. Pedrosa, David. P. Applebaum, Barbara Parrish, Erica Lee English, Harold Eugene Lindsey III, Katz Barron Faust Squitero, MUNB Loan Holdings, LLC, The Bank of New York Mellon (all collectively “BNY Mellon”), BRIDGELoAN, and other Perpetrators implicated, knowingly and intentionally, systematically commit fraudulent acts, *inter alia*, participating in a brazen scheme upon sham court proceedings to deprive and extort Charles Tavares (“Tavares”), staging unnoticed and invalid sham court proceedings to cause false, invalid and fraudulent Final Judgments to be entered, 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, using artifices to prevent and obstruct justice to cover up the scheme, and systematically depriving the State of Florida of honest services upon Florida courts, in violation of, §817.155, F.S. (Fraudulent Practices).

³⁰⁹ At all relevant times, The Bank of New York Mellon, its executives, employees, agents, and representatives, knew that Joseph Horn (“Horn”) and Horn’s family Bridgeloan Investors, Inc.’s is part of a Transnational Continued Criminal Enterprise (“BRIDGELoAN” or “CCE”), and is a sham co-Lender used to deprive and extort U.S. citizen and borrower Charles Tavares (“Tavares”) and to Tavares’ Companies Brickell Village One, LLC, 2147 SW 8 Street, LLC, and Miami River Park Marina, Inc. (“Tavares’ Companies”) in sham loans together with BNY Mellon. In 2011, after Tavares starts to uncover the successful scheme depriving and extorting Tavares of more than \$50 million dollars in properties and rights, under color of law, upon subverted proceedings in the Eleventh Judicial Circuit for Miami-Dade County, Florida (“Miami Courts”), Tavares exposes the scheme to, *inter alia*, BNY Mellon’s [executives](#), Members of the Board of Directors, outside directors, [General Counsel Alvin A. Narin](#) (“Al Narin”), agents, representatives and attorneys, further filing several complaints with BNY Mellon. At all relevant times, BNY Mellon, knowingly and willfully, systematically fails to properly investigate the matter, and stop BNY Mellon’s extortion of Tavares, further, repeatedly threatening and intimidating Tavares with sham Letters to prevent justice and cover up the scheme.

COUNT APROX. DATE

VIOLATIONS

PERPETRATORS

1025	From December 24, 2009 Continuing Through 2024	<u>U. S. CODE TITLE 18</u>	Chief Judge Bertila Ana Soto Adm. Judge Jennifer D. Bailey Implicated Circuit Judges Miami Courts The Criminal Enterprise (CCE)
1026		§ 371 Conspiracy to Defraud the USA &	
1027		§ 241 Conspiracy Against Rights &	
1028		§ 242 Deprivation of Rights -Under Color of Law &	
1029		§ 1346 Scheme/Artifice to Defraud &	
1030		§ 1961 <i>et seq.</i> – RICO &	
1031		<u>FLORIDA STATUTES</u> Title XLVI § 817.155 Fraudulent Practices & <u>FLORIDA CODE OF JUDICIAL CONDUCT</u> Violations of Canons 1, 2, and 3	

From December 24, 2009, continuing through 2024, the Eleventh Judicial Circuit for Miami-Dade County, FL (“Miami Courts”), knowingly and intentionally, allows a continued criminal scheme to deprive, steal, and extort U.S. citizen Charles Tavares (“Tavares”) of all properties and rights, under color of law, by a known Continued Criminal Enterprise (“CCE”),³¹⁰ comprised of, among others, officers of the courts, for more than ten (10) continuous years. The scheme starts in the styled-action *Bridgeloan Investors, Inc. v. Charles Tavares, et al., v. BNY Mellon*, Case No.2009-93058-CA-30, predicated on, *e.g.*, sham claims supported by fraudulent affidavits of Bridgeloan, and an invalid and fraudulent settlement predicated on invalid and fraudulent Power of Attorneys for Tavares’s Companies, fabricated by officers of the court, among others, Thomas R. Lehman (Florida Bar No.351.318), Patrick J. Rengstl (Florida Bar No. 581.631), and Olten Ayres de Abreu Jr. (Brazil OAB-SP No. 75.820), and, upon Tavares’s uncovering the fraudulent settlement upon the subverted Miami Courts, Tavares is extorted by Lehman, Larry Stumpf (Florida Bar No.280.526), *et al.*, depriving Tavares of \$50 million dollars. The CCE, with the Miami Courts, to extort and silence Tavares, continues with sham Related Cases³¹¹ predicated on sham claims, pleadings, affidavits, and improper notices, and sham orders upon *Kangaroo Courts*, willfully 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), to systematically deprive, steal, and extort Tavares of all properties and rights, until the last case, the 139 TH Case, extorting Tavares of his last property in Florida. At all relevant times, the Miami Courts, and its judges, *e.g.*, Chief Judge Bertila A. Soto (Florida Bar No. 822.752), and Administrative Judge Jennifer D. Bailey (Florida Bar No. 386.758), knew the brazen schemes upon the Miami Courts, and willfully assisted the CCE.

³¹⁰ The CCE is comprised of, *inter alia*, reckless attorneys using their Bar licenses as guise to commit crimes against the United States, U.S. citizens, and U.S. companies, *inter alia*, intercontinental money laundering, bank, mortgage, tax-free bond frauds, tax evasion and frauds, extortion of citizens and companies, corrupting and subverting Florida Courts, undermining the rule of law. See [Tavares Sworn Affidavit](#).

³¹¹ See, other sham Related Cases to extort Tavares by the CCE upon *Kangaroo Courts in the subverted Miami Courts; BNY Mellon v. Charles Tavares*, Case No.2010-26864-CA-30; *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No.2011-29624-CA-30; *Geania A. Fraga v. Charles Tavares*, Case No.2012-3753-FC-04; *Deutsche Bank v. Charles Tavares*, Case No. 2012-20197-30; *Markowitz Ringel Trusty & Hartog v. Miami River Park Marina, Inc. v. BRIXRIV, LLC*; *Geania A. Fraga v. Charles Tavares*, Case No. 2012-24483-FC-04 (the sham “Double-Jeopardy” Fraga II); *Charles Tavares v. Thomas R. Lehman & LKLS+G*, Case No, 2013-12223-CA-01; and, *139TH Avenue S.W. 8TH Street, LLC v. Charles Tavares (“139 TH”)*, Case No. 2018-29700-CA-04. See Record.

COUNTS

Count 1025 - 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 1026 - 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 1027 - Judge Bertila Ana Soto, Judge Jennifer D. Bailey, the Miami Courts, and the Miami Court's Counsel, Enablers³¹² 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 1028 - 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 1029 - 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](#).

³¹² *Inter alia*, Judge Ariana Fajardo-Orshan (Judge Fajardo) (Florida Bar No. 91.049), [assigned to the closed Sham Case Bridgeloan Investors, Inc. v. Charles Tavares](#), Case No. 2009-93058-CA-30 ("BRIDGELOAN Case"). Judge Fajardo is the former [US Attorney](#) for the Southern District of Florida from 2018 to 2021. Judge Fajardo, as the US Attorney for the SDFL, systematically and irreconcilably failed to investigate U.S. citizen and victim Charles Tavares' ("Tavares") repeated complaints to her office, supported by an abundance of hard evidence showing the subversion of Miami Courts by a known CCE, further depriving and extorting Tavares of rights and properties in sham proceedings, undermining the rule of law and our democracy.

Count 1030 - Chief Judge Bertila Ana Soto (“Chief Judge Soto”), Administrative Judge Jennifer D. Bailey (“Judge Bailey”), 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 *Bridgeloan Investors, Inc., v. Charles Tavares, et al. v. Bridgeloan Investors, Inc., v. Third-Party Defendant Romulo P. Dantas v. MUNB Loan Holdings, LLC*, Case No. 2009-93058-CA-30 (“BRIDGELOAN” Case), in the [11th Judicial Circuit for Miami-Dade County, Fla](#) (“Miami Courts”). The record displayed shows to any reasonable outside honest observer that the BRIDGELOAN Case is vitiated by fraud by officers of the court, with sham pleadings, fabricated fraudulent and contradictory Sworn Financial Affidavits in support of Plaintiff’s Bridgeloan Investors, Inc.’s claims, a false, invalid and fraudulent settlement entered by Tavares’ attorneys conspiring together with reckless opposing attorneys of Bridgeloan Investors’ and BNY Mellon, and upon Tavares uncovering the scheme, Tavares’ attorneys systematically threaten, coerce, intimidate, and extort Tavares not to fight the *Criminal Enterprise*, and showing officers of the court shamelessly staging, on April 8, 2011, an unnoticed invalid sham “Trial” to allow corrupt Judge Allan Lester Langer – also shamelessly presiding three other Related Cases depriving and extorting Tavares, to enter patently null and void Final Judgments that they all know in truth and in fact are false, invalid and fraudulent. The Record displayed also shows that, *inter alia*, after the successful extortion in the sham staged *Trial*, under color of law, of Tavares’ Properties and rights, Tavares’ attorneys Levine Kellogg Lehman Schneider + Grossman, LLP “LKLS+G”), stay in an unauthorized representation for Tavares’ Companies for sixteen (16) months to prevent justice and cover up the scheme. The Record displayed shows that Tavares’ new attorneys Buchanan Ingersoll & Rooney, PC (“Buchanan Ingersoll”), in October 2012, after filing a Motion to Reopen the Case due to fraud upon the court by officers of the court (“Motion to Reopen”), are successfully threatened, intimidated, and coerced by BRIDGELOAN’s attorneys to withdraw the Motion to Reopen, the hearing on the motion, and stop representing Tavares in the BRIDGELOAN case, further preventing justice and extorting Tavares to cover up the scheme. Then, the CCE causes corrupt Judge Norma Shepard Lindsey, wife to implicated BNY Mellon’s attorney Harold Eugene Lindsey III, to preside, in fatal conflict of interest, the BRIDGELOAN Case – and three (03) other Tavares’ Related Cases, to continue preventing justice and cover up the scheme. 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 BRIDGELOAN 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 1031 – 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.

COUNTS **APROX. DATE** **VIOLATIONS** **PERPETRATORS**

1032 1033 1034 1035 1036 1037	From at Least in or Around 2011 Through in or Around 2024 and Continuing	<p align="center">U. S. CODE TITLE 18</p> <p>§ 371 Conspiracy to Defraud the United States of America & § 241 Conspiracy Against Rights & § 242 Deprivation of Rights Under Color of Law & § 1346 Scheme/Artifice to Defraud Honest Services & § 1341 Mail Fraud &</p> <p align="center">FLORIDA BAR RULES OF CONDUCT Misconduct – Dishonesty-Fraud-Deceit Rule 4-8.4 (a)(b)(c)(d)</p>	The Florida Bar Joshua E. Doyle John F. Harkness The Board of Governos Fla. Bar Annemarie C. Craft Arlene Kalish Sankel
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From 2011, through 2024 and continuing, The Florida Bar,³¹³ 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 complaints³¹⁴ 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 client Tavares, under color of law, filing fraudulent pleadings that they all knew to be false and invalid, making false statements in an unnoticed invalid staged sham Trial of April 8, 2011, causing Tavares to lose Properties and rights, and money laundering the 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, Florida Bar Misconduct – Rule 4-8.4 (a)(b)(c)(d). See Record.

³¹³ 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](#).

³¹⁴ 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 integrated³¹⁵ 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 tax³¹⁶ dollars.

Its public mission statement is *“Regulate the practice of law in Florida; ensure the highest standards of legal professionalism in Florida; and protect the public by prosecuting unethical attorneys and preventing the unlicensed practice of law.”* See www.floridabar.org 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.

³¹⁵ See, [The 1949 Decision by the Supreme Court of Florida.](#)

³¹⁶ 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 at Document #702751.

COUNTS

Count 1032 - 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 1033 - 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 1034 - 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 1035 - 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 1036 - 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 1037 - 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 Hartog, Markowitz Trustee, and other Florida Bar licensees implicated, and by further making false statements in writing in 2014, in order to cover up the scheme, depriving, under color of law, Tavares of constitutionally guaranteed rights, and his properties, further depriving the United States and the State of Florida of honest services upon a court of law, in violation of, among other laws, §837.02, F.S., Title 18 U.S.C. §371, Title 18 U.S.C. §241, Title 18 U.S.C. §242, Title 18 U.S.C. §1346, Title 18 U.S.C. §1349, Title 18 U.S.C. §1341, Title 18 U.S.C. §1343, Abuse of Process - Florida Common Law, and in further violation of Florida Bar [Oath](#), and Rules of Professional Conduct, Rule 4-8.4 MISCONDUCT. See The Florida Bar Rules of Conduct, Rule 4-8.4.

COUNTS **APROX. DATE** **VIOLATIONS** **PERPETRATORS**

<u>COUNTS</u>	<u>APROX. DATE</u>	<u>VIOLATIONS</u>	<u>PERPETRATORS</u>
1038	From at Least in or Around 2014 Through in or Around 2024 and Continuing and Ongoing to This Date	<u>U. S. CODE TITLE 18</u> § 371 Conspiracy to Defraud the United States of America	Joseph Horn Ralph Horn Ricardo Eichenwald
1039		& § 241 Conspiracy Against Rights	Fernando Braghin Nelson Slosbergas Bridgeloan Investors, Inc.
1040		& § 1349 Conspiracy to Defraud	Olten Ayres de Abreu Junior Gabriela M. Machado Guimaraes
1041		& § 1346 Scheme/Artifice to Defraud	Hugo Barreto Del Priore BANIF Securities
1042		& § 1343 Mail Fraud	Ernesto Pereira Lopes Rubens Menin Teixeira de Souza
1043		& § 1952 Interstate and Foreign Travel or Transportation in aid of Racketeering	AHS Residential a.k.a. RESIA LLC The Continued Criminal Enterprise

From at least 2014, and continuing, Joseph Horn’s (“Horn”) Transnational Continued Criminal Enterprise (“Criminal Enterprise” or “CCE”),³¹⁷ together with other Associates,³¹⁸ after systematically depriving and extorting, under color of law, U.S. citizen and victim Charles Tavares (“Tavares”) of all properties and rights in sham proceedings upon subverted Florida courts,³¹⁹ further conspiring jointly and together to deprive and extort Tavares of remaining properties and rights in Brazil, to totally destroy and silence Tavares from continuing to expose the CCE’s Global schemes through the United States of America, and other countries, where Horn’s CCE is freely operating, systematically interfering with tenants and agents of Tavares’ commercial and residential properties in Brazil, and further subverting civil proceedings upon courts of law in Brazil³²⁰ relating to Probate Estates for Tavares’ mother and father, to the CCE can continue extorting Tavares of properties and rights, preventing justice in the United States of America.

³¹⁷ Horn’s Global CCE, operating freely in the United States of America, Brazil, Portugal, Republic of Panamá, Switzerland, B.V.I., the Cayman Islands, and elsewhere, from at least, in or around 1991, and continuing to this date, see Brief page B-003 (“B-003”), has evolved into a Global Network of Counterparts furthering major bank, mortgage, bond, securities, and tax frauds, extortion of U.S. citizens and companies, corrupting and subverting the judicial and political machineries, undermining the rule law to further the schemes, and to prevent justice.

³¹⁸ Among other Associates, Fernando Braghin (“Braghin”), [Nelson Slosbergas](#) (“Slosbergas”), [Stephen A. Freeman](#) (“Freeman”), [Marco Emilio Rojas](#) (“Rojas”), [Olten Ayres de Abreu Junior](#) (“Abreu Jr.”), [Gabriela Machado Guimaraes](#) (“Guimaraes”) (D.O.B. 08/17/1965, in Brazil), [Hugo Del Priore](#) (“Del Priore”), [BANIF Securities, Inc.](#), Cayman Islands (“BANIF”), [Ernesto Pereira Lopes](#) (“Lopes”), [Rubens Menin Teixeira de Souza](#) (“Rubens Menin”), AHS Residential, LLC n.k.a. RESIA, LLC (“RESIA”), and Enablers, *inter alia*, The Bank of New York Mellon (“BNY Mellon”)

³¹⁹ See, the Sham Related Cases in the [Eleventh Judicial Circuit in Miami-Dade County, Florida](#), *Bridgeloan Investors, Inc. v. Charles Tavares, et al.*, v. *MUNB Loan Holdings, LLC a.k.a. BNY Mellon v. Romulo Pina Dantas, et al.*, Case No. 2009-93058-CA-30 (“BRIDGELoAN Case”); *The Bank of New York Mellon v. Charles Tavares*, Case No. 2010-26864-CA-30 (“BNY Mellon Case”); *Brickell Commerce Plaza, Inc. and The Car Wash Concept, Inc. v. Charles Tavares*, Case No. 2011-29624-CA-30 (BCP & Car Wash” Case); *Geania Alves Fraga v. Charles Tavares*, Case No. 2012-003753-FC-04 (the “First Sham Fraga Domestic Repeat Violence Case”); *Deutsche National Bank & Trust v. Charles Tavares*, Case No. 2012-20197-CA-30 (“Deutsche Bank Case”); *Markowitz Ringel Trusty & Hartog, Trustee v. BANIF & BRIDGELoAN’s BRIXRIV, LLC v. Tavares’ Miami River Park Marina, Inc.*, Case No. 2012-21795-CA-22 (“Markowitz Case”); *Geania Alves Fraga v. Charles Tavares*, Case No. 2012-024483-FC-04 (the Second Sham “Double-Jeopardy Fraga Domestic Repeat Violence Case”); *Charles Tavares, Brickell Village One, LLC & 2147 SW 8 Street, LLC v. Thomas Ralph Lehman & Levine Kellogg Lehman Schneider + Grossman, LLP* (“LKLs+G”), Case No. 2013-12223-CA-40 (“Lehman & LKLs+G Legal Malpractice & Fraud Case”); *139TH Avenue SW 8 Street, LLC v. Charles Tavares*, Case No. 2018-29700-CA-04 (“139 TH Case”); and the fabricated Florida Supreme Court Cases *Charles Tavares v. Bridgeloan Investors, Inc.*, Case No. SC-18-435 (“Sham Bridgeloan Fla. Supreme Court Case”); and *Charles Tavares v. Brickell Commerce Plaza, Inc., et al.*, Case SC18-2148 (“Sham Bridgeloan Fla. Supreme Court BCP Case”).

³²⁰ The systematic and continuous torts by the CCE’s Associates in Brazil to interfere with Tavares’ tenants and properties in Brazil, and the subversion of proceedings in Tavares’ mother and father Probates since 2014, is to destroy Tavares financially, preventing Tavares ability to continue exposing the CCE’s Global Schemes from Tavares’ unique inside knowledge of schemes. See Records upon Request by Law Agencies.

COUNTS

Count 1038 - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to systematically further underlying schemes defrauding 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 Title 18 U.S.C. §371.

Count 1039 - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to further known schemes systematically defrauding, extorting, injuring, oppressing, threatening, and intimidating 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, among other things, the right to an uncorrupted courts of law, 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 1040 - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown 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, under color of law, in violation of, Title 18 U.S.C., § 1349.

Count 1041 - The Perpetrators implicated, did knowingly combine, conspire, confederate, and agree among themselves, and others known and unknown implicated bad actors, to further known underlying schemes systematically defrauding 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, systematically corrupting and subverting the judicial machinery by, *inter alia*, criminals using their 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 1042 - The Perpetrators implicated, to further known underlying schemes subverting Florida courts to steal, deprive, and extort 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 1043 - The Perpetrators implicated, to further known underlying schemes subverting Florida courts to steal, deprive, and extort 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 interstate and foreign travel or transportation on aid of racketeering enterprises, in violation of, Title 18 U.S.C. § 1952.

CONCLUSION

The record displayed here, clearly shows that, the Transnational Continued Criminal Enterprise (“CCE”) has successfully subverted 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, bankers, 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 5, 2024

FURTHER AFFIANT SAYETH NAUGHT

/s/ Charles A. Tavares

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