

Rush

Rush

CORPORATION COUNSEL
DEPARTMENT OF LAW

17MI 400775

DAILY COURT CASE TRANSMITTAL SHEET
HOUSING COURT

<u>ROOM</u>	<u>COURT DATE</u>	<u>COURT TIME</u>
1105	March 30, 2017	9:30 a.m.

PROPERTY ADDRESS: 1720 N. Sedgwick St.

DEFENDANTS: JOSEPH YOUNES, et. al.

FILED 39
2017 MAR 22 AM 5:58
JORDAN M. ...
CLERK OF CIRCUIT COURT
CIVIL DIVISION

FILED

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

2017 MAR 22 AM 5:09 MUNICIPAL DEPARTMENT- FIRST DISTRICT

CITY OF CHICAGO,
 a municipal corporation,
 Plaintiff,
 v.
 JOSEPH YOUNES, ASSOCIATED
 BANK, N.A.; AND UNKNOWN
 OWNERS AND NON-RECORD
 CLAIMANTS,
 Defendants.

No. **17 M1 400775**
 Re: **1720 N. Sedgwick St.
 Chicago, IL 60644**
 PIN: **14-33-324-044-0000**
 Amount Claimed: **\$6,500 (+)**
 Courtroom: **1105**

PLAINTIFF'S COMPLAINT FOR EQUITABLE AND OTHER RELIEF

Plaintiff City of Chicago ("City"), by its attorney, EDWARD SISKEL, Corporation Counsel, complains of the Defendants as follows:

GENERAL ALLEGATIONS

Nature of the Case

1. The City brings this action pursuant to its police power as a home rule unit under Article VII of the Illinois Constitution, which includes "the power to regulate for the protection of the public health, safety, morals and welfare." Ill. Const. art. VII, par. 6(a). As a further grant of authority, the City brings this action pursuant to the Unsafe Property Statute, 65 ILCS 5/11-31-1(a) *et seq.* (2004), as amended, the Illinois Municipal Code, 65 ILCS 5/11-31-2(a), *et seq.* (2004), the Injunctive Relief Statute for Building and Zoning Violations, 65 ILCS 5/11-13-15 (2005), and Chicago Municipal Code ("Code"). By bringing this action, the City seeks, among other things, to abate the conditions at the property in question and to obtain equitable relief, civil penalties, attorney's fees and costs in this matter.

930

8-30-17

1105

The Parties and the Property at Issue

2. The City is a municipal corporation organized and existing under the laws of the State of Illinois.
3. There is a property commonly known as **1720 N. Sedgwick St.**, Chicago, Illinois (“Subject Property”), with a property index number **14-33-324-044-0000** and a legal description as follows:

THE EAST 66 FEET OF LOT 8 IN C. J. HULLS
SUBDIVISION OF BLOCK 51 IN CANAL TRUSTEE’S
SUBDIVISION OF SECTION 33, TOWNSHIP 40
NORTH, RANGE 14, EAST OF THE THIRD
PRINCIPAL MERIDIAN, IN COOK COUNTY,
ILLINOIS.

4. Located on the Subject Property is a three story, mixed use building of frame construction (“Subject Property”).
5. At all times relevant to this complaint, the Defendants owned, managed, controlled, collected rents from, contributed to the ongoing violations at, and/or had a legal or equitable interest in the Subject Property. More specifically:
 - A. **JOSEPH YOUNES**, as record owner by a warranty deed recorded on August 16, 2006, as document # 0622826137, has owned and controlled the Subject Property and has an ownership interest in the Subject Property;
 - B. **ASSOCIATED BANK, N.A.**, as mortgage holder, has an equitable interest in the Subject Property;
 - C. All remaining defendants are the **UNKNOWN OWNERS AND NON RECORD CLAIMANTS** of the Subject Property.
6. That **JUDY FRYDLAND** is the Commissioner of the Department of Buildings for the City of Chicago, and as such and pursuant to the Building Code of City of Chicago, caused inspection(s) to be conducted by inspectors of the Department of

Buildings for the City of Chicago, who have knowledge of the facts stated in this complaint.

COUNT I:
BUILDING CODE VIOLATIONS: CIVIL RELIEF

7. The City re-alleges paragraphs 1-6 of the General Allegations, above, and reincorporates those allegations herein as paragraph 7 of Count I and further alleges:
8. All buildings in the City of Chicago must meet the minimum requirements for electrical, plumbing, heating and ventilation and general building requirements. Municipal Code of Chicago, § 13-196-010 (2008) (“Every existing building shall comply with the code requirements in force and applicable to such building...”).
9. An owner of, or any person in management or control of, any building or premises that is found to be in violation of the provision of this code shall be liable for any violation therein, existing or occurring. Municipal Code of Chicago, §13-12-020 (2008).
10. Any violation of, or resistance to or interference with the enforcement of, any of the provisions of this Code enumerated in §13-12-010, to which no other penalty provision is applicable shall be punished by a fine of not less than \$200.00 and not more than \$500.00, and each day such violation shall continue shall constitute a separate and distinct offence for which a fine as herein provided shall be imposed. Municipal Code of Chicago, §13-12-040 (2008).
11. The Defendant as the owner and or manager failed to comply with the Municipal Code of the City of Chicago regarding:
 - A. Specifically, on or about March 14, 2017, and on each succeeding day thereafter, the Defendant as the owner and or manager failed to:

CN061024

1. Failed to maintain building or structure in a structurally safe and stable condition. The Building Commissioner requests submission of two (2) copies of a structural condition report prepared, signed and sealed by an Illinois licensed Architect or Structural Engineer, attesting to the structural conditions of the building or structure in violation of §13-196-030 of the Code;

THE ROOF AND ROOF JOISTS TO PROPERTY WERE REMOVED. STRUCTURAL STABILITY OF BRACING IN QUESTION. BRACING NOT DETAILED IN PERMITS AND FOR WORK BEYOND SCOPE OF PERMIT. A REPORT FROM A LICENSED STRUCTURAL ENGINEER IS REQUIRED TO DELINEATE HOW THE BUILDING IS CURRENTLY STABILIZED AND HOW TO COMPLETE THE CONSTRUCTION OF THE BUILDING CONSISTENT WITH THE CODE. ***THIS IS A DANGEROUS AND HAZARDOUS CONDITION.***

CN068014

2. Failed to maintain roof structure in sound condition, good repair, and free from defects which may admit rain, in violation of §§13-196-530, 13-196-530(e), 13-196-641 of the Code;

ROOF REMOVED ALLOWING RAIN INTO THE INTERIOR.

NC1020

3. Performed or allowed construction or alteration work contrary to or exceeding the scope of approved plans and permits in violation of §§13-32-010, 13-12-050 of the Code;

PERMIT DID NOT PROVIDE FOR REMOVAL OF ROOF. THIS PROPERTY IS IN A LANDMARK DISTRICT AND THE SCOPE OF THE WORK PERFORMED EXCEEDED THE PERMIT. THAT PERMIT WAS REVOKED AND A STOP WORK ORDER ISSUED. A NEW PERMIT IS REQUIRED TO COMPLETE THE REPAIRS AT THE PROPERTY

WHEREFORE, the City respectfully requests that this Honorable Court issue a fine against Defendant, **JOSHEPH YOUNES**, as provided under §13-12-020 of the Code and in accordance with §13-12-040, of \$500.00 per violation per day, beginning March 14, 2017, for the violations in paragraph 11A(1-4), until the day this Court enters a finding.

COUNT II:
BUILDING CODE VIOLATIONS: EQUITABLE RELIEF

12. The City re-alleges paragraphs 1-6 of the General Allegations and paragraphs 7-11 of Count I above, and reincorporates those allegations herein as paragraph 12 of Count II and further alleges:
13. That the levying of a fine is an inadequate remedy to secure the abatement of the aforesated municipal code violations and the public nuisance which they constitute, and that it is necessary that a temporary and permanent injunction issue, and if necessary, that a receiver be appointed, to bring the subject property into compliance with the Municipal Code of Chicago.
14. The subject property fails to meet the minimum requirements of the Municipal Code of Chicago as described in the preceding paragraphs.
15. The Injunction Statute for Building and Zoning Violations provides, in pertinent part, that:

In case any building or structure, including fixtures, is constructed . . . or maintained, or any building or structure, including fixtures, or land, is used in violation of an ordinance or ordinances . . . the proper local authorities of the municipality . . . in addition to other remedies, may institute any appropriate action or proceeding . . . (4) to restrain, correct or abate the violation.

See 65 ILCS 5/11-13-15 (2012); *see also* Municipal Code of Chicago § 13-12-070 (2000) (City may obtain an injunction requiring compliance with the provisions of the Building Code).

16. The Illinois Municipal Code provides, in pertinent part, that:

If the appropriate official of any municipality determines, upon due investigation, that any building or structure therein fails to conform to the minimum standards of health and safety as set forth in the applicable ordinances of such municipality, and the owner or owners of such building or structure fails, after due notice, to cause such property so to conform, the municipality may make application to the circuit court for an injunction requiring compliance with such ordinances or for such other order as the court may deem necessary or appropriate to secure such compliance.

See 65 ILCS 5/11-31-2 (2004).

17. Preliminary and permanent injunctive relief is necessary to end the conduct of those defendants who own, control or otherwise manage the subject property in violation of the requirements of the Municipal Code of Chicago.
18. Moreover, the failure of the defendants who own, control or otherwise manage the subject property to maintain the subject property according to the minimum requirements of the Municipal Code of Chicago constitutes an ongoing injury to the public health, safety and welfare, for which there is no adequate remedy at law. *See* Municipal Code of Chicago §13-12-010 (2000) ("In interpreting and applying said provisions of this code, such provisions shall in every instance be held to be the minimum requirements adopted for the protection and promotion of the public health, safety and welfare."). The prosecution and fining alone of these defendants will not promptly abate the nuisance.
19. Where a statute or ordinance authorizes injunctive relief, a municipality need only show that the statute or ordinance was violated to obtain injunctive relief. *See Village of Riverdale v. Allied Waste Trans., Inc.*, 334 Ill. App. 3d 224, 228-29 (1st Dist. 2002); *City of Chicago v. Krisjon Constr. Co.*, 246 Ill. App. 3d 950, 959 (1st Dist. 1993); *City of Chicago v. Piotrowski*, 215 Ill. App. 3d 829, 834-35 (1st Dist. 1991).

WHEREFORE, the City respectfully requests that this Honorable Court to:

- A. Order Defendant as follows:
 - 1) Immediately repair all of the above-listed violations;
 - 2) Allow a complete interior and exterior inspection by the City of Chicago building inspectors to verify that all required repairs have been completed and are in compliance with all applicable laws and standards;
 - 3) Obtain all of the necessary permits required to perform the work; and,
 - 4) Hire licensed and bonded electricians and plumbers to do the necessary work, where applicable;
- B. Appoint a receiver to correct the conditions alleged in the Complaint with full powers of receivership, including the right to issue and sell receivers certificates in accordance with 65 ILCS 5/11-31-2, as amended;
- C. For an order authorizing the plaintiff to repair, enclose or clean up the Subject Property, if necessary, and a judgment against defendants and lien on the subject property for these costs in accordance with 65 ILCS 5/11-31-1(a), as amended;
- D. If appropriate and under proper petition, for an order declaring the property abandoned under 65 ILCS 5/11-31-1(d), as amended, and for an order granting the City of Chicago a judicial deed to the property if declared abandoned;
- E. If a statutory lien is obtained in this proceeding under 65 ILCS 5/11-31-1 or 65 ILCS 5/11-31-2, as amended and for an order permitting foreclosure of said lien in this proceeding;

- F. Award to the City court costs, attorney's fees and other costs related to the enforcement of 65 ILCS 5/11-31-1(a) against the defendants; and,
- G. Any other relief that this Court deems appropriate.

COUNT III:
CHICAGO LANDMARKS VIOLATIONS: CIVIL PENALTIES

- 20. The City re-alleges paragraphs 1-6 of the General Allegations, above, and reincorporates those allegations herein as paragraph 20 of Count III and further alleges.
- 21. The City brings this action pursuant to the **Chicago Landmarks Ordinance**, Section 2-120-580 *et seq.* of the Code.
- 22. Section 2-120-740 of the Code provides, in pertinent part, that:

No permit for alteration, construction, reconstruction, erection, demolition, relocation, or other work, shall be issued to any applicant by any department of the City of Chicago without the written approval of the commission for any area, place, building, structure, work of art or other object for which the commission has made a preliminary recommendation for landmark status or which has been designated as a "Chicago Landmark" in the following instances: (1) where such permit would allow the alteration or reconstruction of or addition to any improvement which constitutes all or a part of a landmark or proposed landmark; or (2) where such permit would allow the demolition of any improvement which constitutes all or a part of a landmark or proposed landmark; or (3) where a permit would allow the construction or erection of any addition to any improvement or the erection of any new structure or improvement on any land within a landmark district . . .
- 23. Section 2-120-910 of the Code provides, in pertinent part, that:

Failure to perform any act required by the ordinance codified in this Article XVII or performance of any action which is prohibited by said sections shall constitute a violation thereof. . . if the owner of property designated a "Chicago Landmark" wilfully or through gross negligence causes all or any part of the property to be

demolished or substantially destroyed or altered without the approval of the city council or the commission, as the case may be, then no permit to construct a new structure or improve said structure shall be issued for said property or for the land upon which the landmark stood within five years of the date of the demolition or alteration. Thereafter for a period of 20 years, commencing at the end of the five-year period herein before stated, any application for a building permit on the subject premises shall follow the procedure heretofore set out in Section 2-120-740 through 2-120-800.

24. During the time that Defendant owned the Subject Property, he failed to comply with the Chicago Landmarks Ordinance regarding:

A. Specifically, on or about March 14, 2017, and on each succeeding day thereafter, the Defendant as the owner and manager:

2-120-740

1. Performed, authorized or allowed work or other acts requiring review without a permit on a property designated a "Chicago Landmark."

OWNER OF SUBJECT PROPERTY DESIGNATED A "CHICAGO LANDMARK" VIOLATED SCOPE OF PERMIT AND ALTERED PROPERTY CONTRARY TO APPROVED PLANS.

2-120-910

2. The owner of property designated a "Chicago Landmark" willfully or through gross negligence caused all or part of the property to be demolished or substantially destroyed or altered without the approval of the City Council or the Commission.

OWNER OF SUBJECT PROPERTY DESIGNATED "CHICAGO LANDMARK" WILLFULLY CAUSED THE ROOF AND SIDES OF BUILDING TO BE DEMOLISHED AT THE SUBJECT PROPERTY WITHOUT THE APPROVAL OF CITY COUNCIL OR THE COMMISSION.

WHEREFORE, the City respectfully requests that this Honorable Court:

- A. Find Defendant violated § 2-120-740 of the Code in that the Defendant performed, authorized and allowed work requiring review without a permit, at the Subject Property;
- B. Fine Defendant the maximum amount per day for each violation listed in paragraph 24A(1) beginning March 14, 2017, pursuant to § 2-120-910 of the Municipal Code of Chicago;
- C. Grant any other relief that this Court deems appropriate.

COUNT IV:
CHICAGO LANDMARKS VIOLATION: EQUITABLE RELIEF

- 25. The City re-alleges paragraphs 1-6 of the General Allegations and paragraphs 20-24 of Count III above, reincorporates those allegations herein as paragraph 25 of Count IV and further alleges:
- 26. The owner of the Subject Property designated a “Chicago Landmark” violated the Chicago Landmark Ordinance, as described by § 2-120-580, *et seq.* of the Municipal Code of Chicago; and
- 12. That the levying of a fine is an inadequate remedy to secure the abatement of the aforestated municipal code violations, which they constitute.

WHEREFORE, the City respectfully requests that this Honorable Court to:

- A. Find Defendant willfully or through gross negligence caused all or part of the Subject Property to be demolished or substantially destroyed or altered without the approval of the City Council or Commission.
- B. Enjoin Defendant or its successors from obtaining a permit to construct any new structure or improve the Subject Property for five years from the

date of the demolition or alteration, and thereafter for 20 years, any application for building permit must comply with the Chicago Landmarks Ordinance, pursuant to § 2-120-910 of the Municipal Code of Chicago;

B. Grant any other relief that this Court deems appropriate.

Respectfully submitted,

Edward Siskel
Corporation Counsel

By:



Gregory Janes
Senior Corporation Counsel

Attorney No. 90909
30 N. LaSalle Street, Suite 700
Chicago, Illinois 60602
City of Chicago Department of Law
Building and License Enforcement Unit
(312) 744-9555

VERIFICATION BY CERTIFICATION

Pursuant to Section 5/1-109 of the Code of Civil Procedure, the undersigned certifies that he is a senior corporation counsel for the City of Chicago and that he is the duly authorized agent of the Plaintiff for the purpose of making this certification, and that the statements set forth in this Petition are true and correct, except as to matters therein stated to be on information and belief and as to such matters he certifies as aforesaid that he believes the same to be true.



Gregory Janes
Senior Corporation Counsel

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT- FIRST DISTRICT
LIST OF DEFENDANTS**

Property Address: 1720 N. Sedgwick St.

**JOSHEPH YOUNES
2625 W. FAREWELL AVE.
CHICAGO, IL60645**

**JOSEPH YOUNES
166 W. WASHINGTON, SUITE 600
CHICAGO, IL 60602**

**ASSOCIATED BANK, N.A.
200 N. ADAM STREET
GREEN BAY, WI 543101**

FILED-32

2017 MAR 22 AM 5:59

DOROTHY D. SMITH
CLERK OF CIRCUIT COURT
CIVIL DIVISION

THE BANK OF THE STATE OF TEXAS - CREDIT DEPARTMENT
 00153641 CIVIL-01 3/22/2017 1:10PM
 A/TY: 90909 136 (ENVA)
 NO DEDUCTIONS: \$15,000.00
 CASE NO: 2017140075 (DURTHOM:1.03)
 RETURN DATE: 3/30/2017
 CASE TOTAL: \$358.00
 Attribution
 Dispute Resolution \$10.00
 Attribution
 Arbitration \$25.00
 Document Storage \$25.00
 Law Library \$21.50
 Base Filing Fee \$240.00
 Court Services \$25.00
 Children Welfare Fund \$10.00
 Access Justice Fund \$2.00
 e-Filing \$9.00
 NO FEE \$368.00
 CHANGE \$0.00
 TRANSACTION TOTAL: \$368.00

12MI 400225

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT-FIRST DISTRICT**

THE CITY OF CHICAGO, a municipal corporation,)
Plaintiff,)
v. Joseph Younes)
et al.,)
Defendant(s).)

No: 17 MI 400775
Re: 1720 N. Sedgwick St.
Courtroom 11 05, Richard J. Daley Center

ORDER

This cause coming to be heard on the set call, the court having jurisdiction over the subject matter and the below-named defendant(s), being fully advised in the premises, and having heard evidence and testimony:

IT IS HEREBY ORDERED THAT Defendant(s) _____

- Must personally appear before this court on the next court date. Corporate entities must appear through an attorney.
- Must schedule and be present for an interior / exterior inspection of the entire premises before the next court date with the
 - Department of Buildings
 - Health Department
 - Fire Department
 and an additional inspection _____ with plans and permits on site.
- Must correct the following violations in the complaint: _____ before the next court date or by _____.
- Must board and secure the _____ by _____.
- Shall be subject to a preliminary injunction not to rent, use, lease, or occupy the _____ and must keep the same vacant and secure until further order of court.
- Must keep the entire premises vacant and secure until further order of court.
- Must immediately post notice at all levels of the front / rear porch(es) and notify all tenants and occupants that the porch(es) are to be used for emergency exiting only and not for recreation or storage, and maintain such notice until further order of court.
- Must register the premises as a vacant building pursuant to the Municipal Code of Chicago §§ 13-12-125 to -128 within _____ days and must present proof of registration to the court on the next court date.

City granted leave to file a petition to appoint a receiver in bankruptcy.
 City's petition to appoint a limited receiver is granted.
 ADDITIONALLY, THAT: per a separate order

- All prior orders shall continue in full force and effect until further order of court.
- An alias summons shall issue to: _____.
- The following shall be joined as defendant(s) with summons waived / to issue : _____.
- The following defendants are dismissed without prejudice, no fines, no costs: _____.

- Defendant(s) _____ has / have failed to appear in court or otherwise answer the complaint and is / are in default, the complaint herein is confessed against said defendant(s) and
 - an ex parte judgment in the amount of \$ _____ .00 plus court costs of \$ _____ .00 for a total amount of \$ _____ .00 is entered against said defendant(s).
 - prove-up is continued to a later date.
- City is granted immediate authority to enforce the \$ _____ .00 default judgment entered on ____ / ____ / ____ against _____ there being no just cause to delay enforcement.
- Unknown owners and nonrecord claimants and _____ having failed to appear in court or otherwise plead as of the publication default date of ____ / ____ / ____ are in default and the complaint is confessed against them.

This cause be continued for: case management / trial, settlement, or dismissal / hearing / jurisdiction.
 IT IS FURTHER ORDERED THAT this cause be continued to 4 / 27 / 2017 at 11:00 a.m. / p.m.,
 Courtroom 11 05, Richard J. Daley Center, 50 W. Washington St., Chicago, without further notice.

HEARING DATE: 3 / 30 / 17

By: _____
 Attorney for Plaintiff
 Corporation Counsel #90909
 30 N. LaSalle, Room 700
 Chicago, IL 60602 (312) 744-8791
 FORM CONS.1001 rev. 3/2013

1 of 3

Associate Judge
 Patrice Ball-Reed
 MAR 30 2017
 Circuit Court - Ball-Reed

Pink Copy for Defendant(s) (photocopy if required)

Yellow Copy for City of Chicago Department of Law

White Original for Court Records

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT-FIRST DISTRICT

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,

No: 17 MI 400775

v. Younes
et al., Defendant(s).

Re: 1720 N. Sedgwick

Courtroom 11 05, Richard J. Daley Center

ORDER APPOINTING (LIMITED) GENERAL RECEIVER (circle one)
AND AUTHORIZING ACTION BY THE RECEIVER

This cause coming before the court to be heard on Plaintiff City of Chicago ("City")'s Petition for Appointment of a Receiver, the Court having jurisdiction over the parties and subject matter and being duly advised;

THE COURT FINDS THAT:

1. There exists at the subject premises ("Premises") numerous unhealthy and unsafe building conditions, including conditions that pose an imminent threat of irreparable harm and injury to the health, safety and welfare of the public and occupants of Premises;
2. Defendants, who are owners of or have an interest in Premises, upon notice, have failed to abate or are unable to abate the dangerous and hazardous conditions that exist there;
3. Equitable remedies other than the appointment of a receiver are inadequate in this case because the dangerous and hazardous conditions at the subject property will remain, and the public and building occupants remain at risk unless a receiver is appointed;

WHEREFORE, IT IS HEREBY ORDERED THAT:

1. City's Petition for Appointment of a Receiver is granted. CR Realty ("Receiver") is appointed as Limited Receiver/ General Receiver of the subject property pursuant to City's Petition and 65 ILCS 5/11-31-2.
2. Receiver is authorized to enter into possession of the Premises and immediately perform the following duties:
 - Prepare a feasibility study regarding the care, management, and repair of Premises, costs not to exceed \$ _____ .00
 - Vacate Premises, which includes, but is not limited to, refunding any existing security deposits owed to tenants if they are being permanently relocated, hiring movers and arranging for transportation to new residences
 - Board and secure Premises or board and secure Premises after it is vacated
 - Collect rent, if Premises is occupied and will not be vacated
 - Make repairs, costs not to exceed \$ _____ .00
 - Abate the following conditions at Premises:
 - = Secure a structural engineer's report on the stability of the structure
 - = Secure the walls in safe manner
 - Secure all materials that have been removed from the structure and take the wood that is in the rear
3. Receiver is authorized to retain counsel.
4. Receiver is authorized to employ agents to assist in the performance of its receivership duties.
5. Defendant(s), and his/her/its/their agents, heirs, legatees, successors, and assigns are enjoined and restrained from interfering or obstructing Receiver in the performance of its duties.
6. Upon appointment of Receiver, the owner(s) and/or owner's agent(s) shall: provide Receiver with access to all areas of the Premises immediately; deliver to Receiver master keys for all units within 24 hours; and provide to Receiver all items and materials necessary for Receiver to perform its duties, including rent rolls and access to financial accounts, within seven days.
7. Applicant's bond is excused pursuant to 65 ILCS 5/11-31-2.3; Receiver's surety bond is waived pursuant to 65 ILCS 5/11-31-2.3.
8. Receiver is authorized to issue receiver's certificates for the costs and expenses of the receivership.

IT IS FURTHER ORDERED THAT this cause be continued to 4, 27, 2017 at 11:00 a.m. p.m., Courtroom 11 05, Richard J. Daley Center, 50 W. Washington St., Chicago, without further notice.

HEARING DATE: 3, 30, 2017

By: [Signature]
Attorney for Plaintiff
Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602 (312) 744-8791

Associate Judge
Patrice Ball-Reed
[Signature]
MAY 30 2017
Circuit Court - 1987
Judge Ball-Reed
Courtroom 11 05

Pink Copy for Defendant(s) (photocopy if required)

Yellow Copy for City of Chicago Department of Law

White Original for Court Records

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT-FIRST DISTRICT**

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,

v.
Younes

et al., Defendant(s).

No: 17 M1 400 775
Re: 1720 N. Sedgwick
Courtroom 11 DS Richard J. Daley Center

Pink Copy for Defendant(s) (photocopy if required)

Yellow Copy for City of Chicago Department of Law

White Original for Court Records

EMERGENCY PETITION FOR APPOINTMENT OF A LIMITED / GENERAL RECEIVER (circle one)

The City of Chicago ("City"), by its attorney, the Corporation Counsel, pursuant to 65 ILCS 5/11-31-1, 5/11-31-2 and 5/11-13-15 petitions the Court to appoint a receiver, with the powers granted and duties imposed upon receivers by courts and by statutes, until further order of Court. In support of this Petition, City states as follows:

1. Plaintiff, City, is a municipal corporation, authorized by 65 ILCS 5/11-31-2 (2004) to seek appointment of a receiver to correct conditions that fail to conform to minimum standards of health and safety;
2. The subject premises ("Premises") is located within the City of Chicago, and defendants are owners of or have an interest in Premises;
3. City filed this suit against defendant(s), alleging that dangerous and hazardous conditions exist at Premises. These dangerous and hazardous conditions pose an imminent threat of irreparable harm and injury to the health, safety and welfare of the public and the occupants of Premises;
4. Defendant(s) has/have failed to correct, after due notice, these unsafe and/or unhealthy building conditions;
5. Equitable remedies other than the appointment of a receiver are inadequate in this case because, on information and belief, defendants have failed and are not currently able or willing to abate the unhealthy and/or unsafe conditions in the premises. The conditions which now exist at the premises will remain unabated without the appointment of a receiver, and will result in the loss of salvageable property, as well as irreparable harm to the subject property's occupants, neighbors of the premises and the general public; and
6. Applicant's bond should be excused, and the surety bond waived, pursuant to 65 ILCS 5/11-31-2.3 (2004).

WHEREFORE, the Plaintiff, City of Chicago, respectfully requests that this Court:

- A. Appoint a: General Receiver
 Limited Receiver, with powers granted and duties imposed as specified in paragraph B below until further order of court.
- B. Authorize and order the receiver to enter into possession of the premises and to perform the following duties:
- Prepare a feasibility study regarding the care, management, and repair of the subject property;
 - Vacate the subject property, which includes, but is not limited to, refunding any existing security deposits owed to tenants if they are being permanently relocated, hiring movers and arranging for transportation to new residences;
 - Board and secure the subject property or board and secure the subject property after it is vacated;
 - Collect rent, if the subject property is occupied and will not be vacated;
 - Make repairs;
 - Abate any dangerous and hazardous conditions at the subject property, including:
 - secure the walls in safe manner
 - recap the wood that was removed
 - obtain a structural engineer's report
 - secure all of the material removed from the property wherever it may be.
- C. Authorize the receiver to retain counsel pursuant to Circuit Court Rule 8.2.
- D. Authorize the receiver to employ agents to assist in the performance of his/her receivership duties.
- E. Enjoin and restrain defendants from interfering with or obstructing the receiver's performance of her receivership duties.
- F. Upon the appointment of the receiver, the owner(s) and/or owner's agent(s) shall provide to the receiver access to all areas of the building and deliver master keys for all units within 24 hours, along with all items and materials necessary for the receiver to perform his or her duties including rent rolls and access to all financial accounts within seven days.
- G. Excuse applicant's bond and receiver's bond pursuant to 65 ILCS 5/11-31-2.3.
- H. Authorize the receiver to issue receiver's certificates for the costs and expenses of the receivership.
- I. Continue this matter for a receiver's report and determination of whether a general receivership of the premises is feasible.

VERIFICATION BY CERTIFICATION

Pursuant to section 1-109 of the Code of Civil Procedure, the undersigned certifies that he or she is an attorney for the City of Chicago, and that he/she is the authorized agent of the Plaintiff for the purpose of making this certification, and that the statements set forth in this Petition are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he or she verily believes the same to be true.

By:
Attorney for Plaintiff
Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602
(312) 744-8791

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT/ FIRST DISTRICT

CITY OF CHICAGO, Plaintiff
v.
JOSEPH YOUNES, et al., Defendant

No. 17 M1 400775
Claimed \$: 6,500.00
Return Date: March 30, 3017
Court Date:
Room No.: 1105
Address of Court District for Filing

APPEARANCE AND JURY DEMAND*

- General Appearance 0900 - Fee Paid 0909 - No Fee
- 0904 - Fee Waived 0908 - Trial Lawyers Appearance - No Fee
- Jury Demand* 1900 - Appearance and Jury Demand/Fee Paid Twelve-person Jury
- 1909 - Appearance and Jury Demand/No Fee Paid Six-person Jury

The undersigned enters the appearance of: Plaintiff Defendant
Pro Se JOSEPH YOUNES

(Insert Litigant's Name)

Joseph Younes
Signature

- Initial Counsel of Record Pro Se (Self-represented) **2810** Rule 707 Out-of-State Counsel (pro hac vice)
- Additional Appearance Substitute Appearance

Atty. No.: 55351 Pro se 99500

Name: Joseph Younes
Atty. for: Pro Se
Address: 166 W. Washington St. Suite 600
City/State/Zip: Chicago, Illinois 60602
Telephone: 312-802-1122
Primary Email: Joeyounes@sbcglobal.net
Secondary Email: _____
Tertiary Email: _____

Important
Once this Appearance form is filed, photocopies of this form must be sent to all other parties named in this case (or to their attorneys) using either regular mail, facsimile transmission (fax), Email transmission or personal delivery. (See Illinois Supreme Court Rules 11 and 13 for more information.)

RECEIVED
MAY 30 AM 10:12
CIRCUIT COURT OF COOK COUNTY ILLINOIS
CIVIL DIVISION
DOROTHY BROWN
CLERK

Pro Se Only: I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address: _____

*Strike demand for trial by jury if not applicable.

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Attorney for Plaintiff Defendant

CLERK OF THE CIRCUIT COURT - COOK COUNTY
00170800 Civil-01 3/30/2017 10:07AM
ATTY: 55351 033 BERNICEW
AD DAMNUM: \$15,000.01
CASE NO: 20171400775 COURTROOM:1105
RETURN DATE: 3/30/2017
CASE TOTAL: \$237.00
Appearance Fee 3 \$110.00
Automation \$25.00
Document Storage \$25.00
Arbitration \$10.00
Law Library \$21.00
Court Services \$25.00
Children Waiting Rm \$10.00
Access Justice Fund \$2.00
e-Business \$9.00
CREDIT CARD: \$237.00
CHANGE \$0.00
TRANSACTION TOTAL: \$237.00

Signed Copy

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
Municipal Department - District 1 - Housing Section

3321
2892

CITY OF CHICAGO
Plaintiff

17 APR 25 AM 9:05

Case No.: 2017-M1-400775

vs.

CLERK OF THE CIRCUIT COURT
CIVIL DIVISION

Before: Hon. PATRICE MUNZEL
BALL-REED, Associate Judge

CLERK
DOROTHY BROWN

Case Type: HOUSING
District: First Municipal

1720 N SEDGWICK ST, ASSOCIATED BANK NA,
NON-RECORD CLAIMANTS, UNKNOWN OWNERS
Atty. Joseph Younes, Esq.
Defendants.

TIME-SENSITIVE: to be heard
in Court Room: 1105, by 04/27/2017
Court Time: 11:00am (CST)

Time-Sensitive Judicial Notice of Adjudicative Facts

This notice is filed to bring to The Court's attention facts overlooked twice before, which almost resulted in the house, at question, being destroyed or otherwise subject to illegal construction and/or demolition, both times resulting in "Stop Work Orders" by the City of Chicago to stop **illegal activity done by defendant, Joseph Younes**. If I do not file this notice, then the "3rd time will be a charm," and Mr. Younes may succeed in gutting and destruction of the house. **Under Rule 201(c)(2), Fed.R.Civ.P., The Court must take judicial notice** if a party requests it and The Court is supplied with the necessary information. While Dual Federalism might preclude the Supremacy Clause from applying this Federal Rule to This (State) Court, nonetheless, it is still a good guideline, and, to that end, I shall do my best to provide This Honourable Court the necessary information to make it's job as easy as reasonably possible.

As a legal point, I may have rights as a "non-record claimant," and an interest in this case, since the ownership of this house is being litigated in another case (see below), in which **Richard Daniggelis, who is 78-years old, and who is the true owner**, is contesting ownership: Mr. Daniggelis has promised me some unspecified funds for research I've done for him, thus I am vested with an interest in this litigation (which will affect his ability to continue the other case, win ownership of the house, and be in a better position to pay me what he asserts he owes me). Thus, I have small (but non-zero) rights of intervention. (Mr. Daniggelis is thus an "unknown owner," and a named defendant.) This would also make me a non-record claimant, and a named defendant.

Moreover, This Court should know, realise, & understand one thing: ***I am filing this with the motives to help The Court, and provide helpful information***, so if I am in error in any manner, please forgive and overlook my human limitations, and carefully review that which I take time to provide you.

This Court certainly remembers when Mr. Daniggelis, an elderly, 78-year-old man, asked to speak at the Thursday, 03/30/2017, 09:30am (CST) hearing before This Court regarding the "HOUSING COMPLAINT FILED." If This Court is concerned about **the welfare of the elderly**, then I ask you to take note of these facts: When Mr. Daniggelis asked to speak, Judge Ball-Reed told him that he had no legal standing, as he was not the owner. While Judge Reed had good intentions, she was incorrect: Mr. Daniggelis' signature was forged, thus making him the true owner (even if not the 'legal' owner): see "AFFIDAVIT FILED" and "EXHIBITS FILED" (Activity Date: 8/10/2015, Participant: NON RECORD CLAIMANTS, Attorney: PRO SE) in ***GMAC v. Daniggelis, et al.*** (Case#: 2007-CH-29738 in CHANCERY). A courtesy copy of the WATTS filings (Amicus & Sworn Affidavit), dated Aug. 03, 2015, filed 08/10/2015, is included for the judge's chambers as a courtesy, but not provided to those parties already served (see Certificate of Service). While we don't know who executed the forgery, even the State's Attorney's office admits a forgery was done. (See exhibits) They also admit other crimes were committed, but unprosecuteable, due to the statute of limitations being tolled.

The State's Attorney's statements:

Looking at three (3) things that Asst. State Attorney, Thomas Simpson says, This Court has information that will be useful in determining the HOUSING case:

(#1) First, Asst. St. Atty. Simpson (in paragraph 2) does not call it "alleged" forgery. Rather, he calls in "this forgery." While Younes may not have committed this forgery, he was eventually notified of it, via my court filings, and yet he continued to fight for possession of property that he knew was stolen property. That he did not know who did this is unimportant. For example, if a Pawn Shop gets possession of The Batmobile, buying it from some young 17-year-old, the Police might not be able to find out who sold it to them, but since everyone knows that The Batmobile belongs in a museum (or in the Bat Cave), the Pawn Shop's actions are criminal: they are knowingly dealing in hot (stolen) property, and so is Younes.

(#2) Secondly, Simpson admits that financial crimes were committed, but that he can not prosecute because the "statutes of limitations are exhausted for everything save forgery." Since Younes is benefiting from these financial crimes, he is guilty (but can not be "criminally" prosecuted due to statutes of limitations running out. **Since no one has provided a copy of the warranty deed used to transfer title with an original (not photocopied) signature, we have even more proof that it was indeed a photocopy, as documented in the filings cited above.**

(#3) Third and last, Simpson admits (par. 3) that he believes that "he (Daniggelis) was taken in a scheme," meaning there were guilty parties, obviously including Younes, who benefited from the illegal transfer of title—by getting a FREE house, for which Daniggelis received NO documented payment (no payment at all).

Conclusion

While This Court only considers the 'Housing' matter, nonetheless, the documented criminal actions of Atty. Joseph Younes are relevant and adjudicative facts: First, I warned The Court, in my "Time-Sensitive Judicial Notice..." (dated Sept. 09, 2015, docketed Sept. 11, 2015 in 2007-CH-29738, in Chancery), that Younes was attempting illegal construction/demolition, and I showed This Court photos of a "STOP WORK ORDER," but this court, in its infinite wisdom, ignored me. Because of that, Younes, again, attempted much greater illegal construction/demolition, again drawing the ire of The City of Chicago (which resulted in this case, *City of Chicago vs. Younes*, 2017-M1-400775, being filed – and made local news media: See recent DNAinfo and The Register news coverage, listed elsewhere). While Younes may have not been guilty of the actual forgery, he certainly participated in a scheme, and benefited from it, and was only able to escape jail time & criminal prosecution because the police did not bring charges fast enough, allowing the statutes of limitations to slip by.

While I can not advise This Court on what, precisely, should be done, the statement made in open court by Judge Ball-Reed that Younes would not be allowed to destroy the house is a good statement, and these filings are submitted by the undersigned to help This Court weight and balance the interests of The City with the facts about Younes' character, honesty, and known criminal activity to help is have all the facts.

CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "**Time-Sensitive Judicial Notice of Adjudicative Facts,**" and its exhibits were delivered to the following parties as indicated – this ~~Saturday, the 20th day~~ of April 2017: 17 APR 23 AM 9:05

CIVIL DIVISION: Richard J. Daley Center, 50 West Washington St., Room 601 [8:30 a.m. to 4:30 p.m., Monday through Friday, Excluding Court Holidays] Telephone Numbers: (312) 603-5116, (312) 603-5122, (312)603-5252, Chicago, IL 60602 – . Hours: 8:30a.m. - 4:30p.m. Mon-Fri, Excl. Holidays

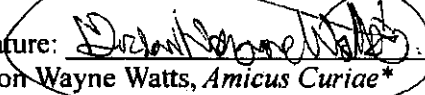
Hon. Patrice Munzel Ball-Reed, Associate Judge, Civil Division, District 1 - Housing Section
Daley Center, 50 W. Washington St., Rm. 1105, Chicago, Illinois 60602, (312) 603-4536 [This number is listed on Judge's page: <http://www.CookCountyCourt.org/JudgesPages/BallReedPatrice.aspx> but clerk says that this is wrong number and goes to room 1107.] *Note:* I may include (for proper context) prior filings for the judge's chambers, not served upon Mr. Younes, but that is because I already served him said papers, when originally filing, so he is not in need of service a second time.

City of Chicago, CORPORATION COUNSEL, 30 N LASALLE 900, CHICAGO IL, 60602, Phone: (312) 742-0200, Note: See not above regarding judge's chambers: *Ibid.* for City Counsel.

Joseph Younes Law Offices / <http://ChicagoAccidentAttorney.net> (312)635-5716, per website: 166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602; Phone: (312) 372-1122 ; Fax: (312) 372-1408. Email is (or was?) RoJoe69@yahoo.com per <http://www.ZoomInfo.com/p/JosephYounes/599467626> *Note:* Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see exhibits to verify], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr. Younes & other litigants), and send me a nominal bill for said service, but, I doubt anyone would question me on this.

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "**Time-Sensitive Judicial Notice of Adjudicative Facts,**" and its exhibits, were served upon all parties listed above, this 22nd day of April, 2017 by the following methods:

- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford.
- E-mail: I may, later, serve all the parties listed above via email, in such cases as I have their e-mail address—as a courtesy. Or, then again, I may not (as it is not required), but if I serve any party electronically (via email), then I will serve all parties, so as to keep everybody in the loop.
- Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra-- linked at the "Mortgage Fraud" story, dated. Fri. 14 Apr. 2017.*

Signature:  Date: Sat Apr. 22, 2017
Gordon Wayne Watts, *Amicus Curiae**
821 Alicia Road
Lakeland, FL 33801-2113
PH: (863) 688-9880
Web: www.GordonWatts.com / www.GordonWayneWatts.com
Email: Gww1210@aol.com / Gww1210@gmail.com
Date: Monday, 17 January 2017

* Watts, acting counsel of record, is not a lawyer. Per Local Rule 2.1, "Notice of Hearing of Motions," Watts, appearing *pro se*, is giving notice of his motion

FILED-11
INDEX TO THE EXHIBITS

17 APR 25 AM 9:06

Instrument

CLERK OF THE CIRCUIT COURT
CIVIL DIVISION

Docket/Tab#

FedEx package refused by Atty. Joseph Younes

CLERK
JENNIFER BROWN

Exhibit-A

Email exchange with Cook County State's Attorney Office

Exhibit-B

FILED-11

FedEx package refused by Atty. Joseph Younes

Exhibit-A

17 APR 25 AM 9:06

Reminder: AOL will never ask you for your password or billing information.

Show images & enable links

Subject: FedEx Shipment 786271226226 Delivery Exception

Date: 4/21/2017 10:24:46 P.M. Eastern Daylight Time

From: Tracking Updates@fedex.com

Reply To: TrackingUpdates@fedex.com

To: www121@bnet.com

Sent from the Internet (Yahoo)

Tracking # 786271226226

Ship date:
Tue, 4/18/2017

Scheduled delivery:
Mon, 4/24/2017 by end
of day

Delivery exception

Shipment Facts

FedEx attempted, but was unable to complete delivery of the following shipment:

Tracking number: 786271226226
 Status: Delivery exception
 Service type: FedEx Ground
 Packaging type: Package
 Number of pieces: 1
 Weight: 0.70 lb.
 Standard transit: 4/21/2017

Resolving Delivery Issues

The reason delivery was not completed is outlined below. Where applicable, resolution recommendations are also provided.

Exception Reason	Recommended Action
1. Refused by recipient - Not ordered	No action is required. The package is being returned to the shipper.
2. Shipment Refused by Recipient	No action is required. The package is being returned to the shipper.

FILED-11
Email exchange with Cook County State's Attorney Office

Exhibit-B

7 APR 25 AM 9:06
In a message dated 6/29/2016 3:39:10 PM Eastern Daylight Time, thomas.simpson@cookcourtyl.gov writes:

Mr. Watts,

CLERK OF THE CIRCUIT COURT
CIVIL DIVISION

CLERK

I am not sure that you understood the import of my last e-mail. So, I will try again. Please excuse my brevity. Without additional evidence, there is not enough evidence to support a criminal charge to a successful prosecution of proof beyond a reasonable doubt. I'm sure that there have been depositions on the civil case, which I have not seen. But, I imagine that there is no one claiming responsibility for a the forgery. How am I to determine who committed the act of forgery on the deed? I can not without additional evidence, of which a confession or statement of one party against another witnessing the act of forgery, bring a criminal charge. I do not expect you to obtain one, I merely was conveying that it would take a compelling piece of evidence to support the charge. All the arguments and things you point out are compelling circumstances, but in this situation the case requires more.

The Robo signing is of no importance as it relates to this forgery or any criminal acts. There is no act in furtherance after the transfer of the property in 2006, the statute of limitations are exhausted for everything save a forgery. Whether or not Daniggels got paid is meaningless to a criminal prosecution, and his relief from the mortgage note is a form of consideration.

Please understand that I feel for Mr. Daniggels as I believe he was taken in a scheme and has lost a great deal because of it, however, I can not institute a criminal case without sufficient evidence. It is a hard pill to swallow for me and I understand if you and Mr. Daniggels refuse to accept it, but it is the case.

Sincerely,

Thomas P. Simpson
Assistant State's Attorney
Cook County State's Attorney's Office
Special Prosecution Bureau
13 B 08
2650 S. California
Chicago, IL 60608

6/30/2016 8:07 AM

Asst. State Atty Simpson (cc: Det. Ding) Here's side-contract... <https://mail.google.com/mail/?ui=2&ik=fbac04d51e&view=pt&search=an...>

773-874-8839

The information contained in this electronic message may be confidential and may be subject to the attorney-client privilege and/or the attorney work product doctrine. It is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, you are hereby notified that any use, dissemination or copying of this communication is strictly prohibited. If you have received this electronic message in error, please delete the original message from your e-mail system. Thank you.

Gmail - RE: Asst. State Atty Simpson (cc: E

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT – FIRST DISTRICT

CITY OF CHICAGO, a municipal corporation,

Plaintiff,

vs.

JOSÉPH YOUNES, ASSOCIATED BANK, N.A., and
UNKNOWN OWNERS AND NON-RECORD CLAIMANTS,

Defendants.

CASE NO.: 17-M1-400775

PROPERTY ADDRESS:
1720 N. Sedgewick St.
Chicago, IL 60644

ENTRY OF APPEARANCE

NOW COMES Heavner, Beyers & Mihlar, LLC, who hereby enters their Appearance
as counsel for Associated Bank, N.A.

HEAVNER, BEYERS & MIHLAR, LLC,

By: 

Austin Schultz Croom
Of Heavner, Beyers & Mihlar, LLC

HEAVNER, BEYERS & MIHLAR, LLC (#40387)
Attorneys at Law
P.O. Box 740
Decatur, IL 62525
Telephone: (217) 422-1719
Fax: (217) 424-1754
Email: OrdinanceViolations@hsbattys.com

17 APR 26 PM 2:48
CLERK

CLERK OF THE CIRCUIT COURT - COOK COUNTY

00293168 Civil-01 4/26/2017 3:12PM

ATTY: 40387 030 GERAGAGN

AD DAMNUM: \$15,000.01

CASE NO: 20171400775 COURTROOM:

RETURN DATE: 4/26/2017

CASE TOTAL: \$237.00

Appearance Fee 3	\$110.00
Automation	\$25.00
Document Storage	\$25.00
Arbitration	\$10.00
Law Library	\$21.00
Court Services	\$25.00
Children Waiting Rm	\$10.00
Access Justice Fund	\$2.00
e-Business	\$9.00
REFUND	\$1.00

CHECK NO: 162316

CHECK AMOUNT: \$238.00

CHANGE \$0.00

TRANSACTION TOTAL: \$238.00

3321

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT - FIRST DISTRICT

CITY OF CHICAGO, a municipal corporation,

Plaintiff,

vs.

JOSEPH YOUNES, ASSOCIATED BANK, N.A., and
UNKNOWN OWNERS AND NON-RECORD CLAIMANTS,

Defendants.

CASE NO.: 17-M1-400775

PROPERTY ADDRESS:
1720 N. Sedgewick St.
Chicago, IL 60644

NOTICE OF FILING AND CERTIFICATE OF SERVICE

I, Austin Schultz Croom, being first duly sworn on his oath, certifies that he caused the foregoing *Entry of Appearance* to be sent for filing with the Clerk of the Circuit Court of Cook County, and served upon the parties listed below by depositing it in the USPS Pickup Box with proper prepaid postage on April 27, 2017.

Joseph Younes
166 W. Washington St., Ste. 600
Chicago, IL 60602

Unknown Owners & Non-Record Claimants
1720 N. Sedgewick St.
Chicago, IL 60644

City of Chicago, a municipal corporation
c/o Assistant Corporation Counsel
30 N. LaSalle St., 7th Floor
Chicago, IL 60602



Austin Schultz Croom

HEAVNER, BEYERS & MIHLAR, LLC (#40387)
111 E. Main St.
Decatur, IL 62523
Phone: (217) 422-1719
Fax: (217) 422-1754
ordinanceviolations@hsbattys.com

17 APR 26 PM 2:18
CIRCUIT COURT OF COOK COUNTY

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT-FIRST DISTRICT

425
4519

THE CITY OF CHICAGO, a municipal corporation,)
Plaintiff,)
v. Joseph Younes)
et al.,)
Defendant(s).)

No: 17 MI 400775
Re: 1720 N. Sedgwick St.
Courtroom 1105, Richard J. Daley Center

ORDER

This cause coming to be heard on the set call, the court having jurisdiction over the subject matter and the below-named defendant(s), being fully advised in the premises, and having heard evidence and testimony:

IT IS HEREBY ORDERED THAT Defendant(s) Younes Receiver

- Must personally appear before this court on the next court date. Corporate entities must appear through an attorney.
- Must schedule and be present for an interior / exterior inspection of the entire premises before the next court date with the
 - Department of Buildings
 - Health Department
 - Fire Department and an additional inspection _____ with plans and permits on site.
- Must correct the following violations in the complaint: _____ before the next court date or by _____.
- Must board and secure the _____ by _____.
- Shall be subject to a preliminary injunction not to rent, use, lease, or occupy the _____ and must keep the same vacant and secure until further order of court.
- Must keep the entire premises vacant and secure until further order of court.
- Must immediately post notice at all levels of the front / rear porch(es) and notify all tenants and occupants that the porch(es) are to be used for emergency exiting only and not for recreation or storage, and maintain such notice until further order of court.
- Must register the premises as a vacant building pursuant to the Municipal Code of Chicago §§ 13-12-125 to -128 within _____ days and must present proof of registration to the court on the next court date.
- Receiver shall commence shoring on the front facade corner.
Receiver shall secure bids for the shoring of the rest of the building.

ADDITIONALLY, THAT:

- All prior orders shall continue in full force and effect until further order of court.
- An alias summons shall issue to: _____.
- The following shall be joined as defendant(s) with summons waived / to issue: _____.
- The following defendants are dismissed without prejudice, no fines, no costs: _____.
- Defendant(s) _____ has / have failed to appear in court or otherwise answer the complaint and is / are in default, the complaint herein is confessed against said defendant(s) and
 - an ex parte judgment in the amount of \$ _____ .00 plus court costs of \$ _____ .00 prove-up is continued to a later date.
 - for a total amount of \$ _____ .00 is entered against said defendant(s).
- City is granted immediate authority to enforce the \$ _____ .00 default judgment entered on ____ / ____ / ____ against _____ there being no just cause to delay enforcement.
- Unknown owners and nonrecord claimants and _____

_____ having failed to appear in court or otherwise plead as of the publication default date of ____ / ____ / ____ are in default and the complaint is confessed against them.

The owner's general contractor is authorized to dig 3 holes at the property to determine the nature of the foundation.

This cause be continued for: case management / trial, settlement, or dismissal / hearing / jurisdiction.

IT IS FURTHER ORDERED THAT this cause be continued to 5 / 18 / 2017 at 11:00 am, Courtroom 11 05, Richard J. Daley Center, 50 W. Washington St., Chicago, without further notice.

HEARING DATE: 4 / 27 / 17

By: _____
Attorney for Plaintiff
Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602 (312) 744-8791

Patrice Ball-Reed
APR 27 2017
Circuit Court - 1987
Judge Ball-Reed

Pink Copy for Defendant(s) (photocopy if required)
Yellow Copy for City of Chicago Department of Law
White Original for Court Records

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
Municipal Department – District 1 - Housing Section

CITY OF CHICAGO
Plaintiff,

vs.

1720 N SEDGWICK ST, ASSOCIATED BANK NA,
NON-RECORD CLAIMANTS, UNKNOWN OWNERS,
Atty. Joseph Younes, Esq., et al.
Defendants, and

Gordon Wayne Watts,
Proposed Intervening Defendant.

)
) Case No.: 2017-M1-400775
)

) Before: Hon. PATRICE MUNZEL
) BALL-REED, Associate Judge,

) Case Type: HOUSING

) District: First Municipal

) **TIME-SENSITIVE** to be heard

) in Court Room: 1105, by 05/18/2017

) Court Time: 11:00am (CST)

RECEIVED
MAY 18 2017
CLERK OF COURT
DISTRICT 1

MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS

Gordon Wayne Watts (“Intervenor”) hereby moves this Court, pursuant to 735 ILCS 5/2-408, for permission to intervene in the above-captioned matter, or in the Alternative, for leave to file an *amicus curiae* brief, and for the previously-filed notice, and **this** instant notice/motion (and attached sworn Affidavit), to be deemed to be converted to and constitute said *amicus* brief.

1. The “Time-Sensitive Judicial Notice of Adjudicative Facts” (containing additional facts of interest regarding defendant Younes’ behaviour and actions) which proposed Intervenor, Watts, filed with this Court on 04/22/2017, was timely docketed on 04/25/2017, and properly acknowledged as a *pro se* filing by a non-record claimant.

2. Mr. Richard B. Daniggelis, the true owner, who lost his house (1720 N. Sedgwick St., Old Town, Chicago, IL) through a forged signature in a mortgage fraud scheme (and which fraud tort is still being actively litigated and investigated in several forums, some Judicial and some Executive), was invited by this Court to intervene, in order that he might gain standing to participate in proceedings. The undersigned Intervenor is in communication with Daniggelis, and he asserts that Daniggelis informed Watts that he (Daniggelis) desires to take this Court up on its offer. *I.e., Daniggelis states that he wishes to Intervene.*

3. Intervenor, Gordon Wayne Watts, has done much research and work (see Appendix, *infra*) for Mr. Daniggelis, the latter of whom has indicted his desire to pay Watts for research & shipping services rendered.

4. Mr. Watts has the right to intervene under 735 ILCS 5/2-408(a)(2) because “the representation of the applicant’s interest by existing parties is or may be inadequate and the applicant will or may be bound by an order or judgment in the action.”

5. Moreover, Watts has the right to intervene under 735 ILCS 5/2-408(a)(3) because “the applicant is so situated as to be adversely affected by a distribution or other disposition of property in the custody or subject to the control or disposition of the court or a court officer.”

6. This Motion is timely because Intervenor has filed his Motion before any party has filed any responsive pleading. Moreover, no parties would be prejudiced by granting intervention at this stage.

MEMORANDUM OF LAW:

PETITIONER IS ENTITLED TO INTERVENE AS A MATTER OF RIGHT.

Intervenor, Gordon Wayne Watts, has "unique knowledge" (backed up by a Sworn and Notarised AFFIDAVIT, as well as supported by facts and documented sources, not the least of the which is *DNAinfo*, a local newspaper, **and unique information garnered from Daniggelis, himself, but which he can not convey to the court due to limited legal knowledge**). Since his knowledge of the case is 'unique' and presents additional facts **and** additional legal arguments, by definition, the other parties are not representing said 'unique' facts **and** arguments, and therefore "the representation of the applicant's interest by existing parties is or may be inadequate," giving Watts the right to intervene under 735 ILCS 5/2-408(a)(2).

Moreover, Intervenor, Gordon Wayne Watts, has a sufficient interest in this case that warrants intervention as of right because the theft of Daniggelis' house forced him to begin using expensive storage facilities (for his belongings), made him homeless (or forced him to move in with some Good Samaritan), and all this costs a great deal of monies. The prior illegal construction/demolition that was Defendant Younes was documented to have performed on this house (see prior Watts filing), and the more-current illegal work, greatly in excess of City of Chicago Building Codes (which was the proximal cause of the above-captioned lawsuit by the City against Younes) caused **both financial and emotional harm to Daniggelis**. Moreover, the potential illegal destruction of the Sedgwick house (in this Historic District) would 'moot' any pending litigation and/or investigation into the illegal transfer of title.

The court's potential to allow illegal destruction of this historic-district house would make it infinitesimally-more difficult for Daniggelis to pay back Watts (due to the additional financial and emotional burden so-placed upon him.) Therefore, Watts is "so situated as to be adversely affected by a distribution or other disposition of property in the custody or subject to the control or disposition of the court or a court officer," giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3).

Where intervention as of right is asserted, "the trial court's jurisdiction is limited to determining **timeliness, inadequacy of representation and sufficiency of interest**; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted." *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984). [Emphasis added in underline & bold; not in original] Petitioner satisfies all three requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3).

Newly-discovered facts of a dispositive nature

This Court knows that defendant, Joseph Younes, has denied ever planning or conspiring to break the law in regards to executing 'excessive' work, beyond the permits. However, *DNAinfo* reported that a local attorney, who has no motives to be sued for slander, libel, or defamation of character, said quite the opposite:

"Jordan Matyas, who represented the Old Town Triangle Association at Thursday's court hearing, said Younes was being disingenuous in saying he didn't intend to level the site. "He's told me twice that he always wanted to demolish it," Matyas said, and he told the judge that he intended to pursue a demolition permit as well. "So we have some mixed signals from the owner, but his actions speak clearly about his intent for the building."" [Source: "Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, *DNAinfo*, **March 30, 2017**: <https://www.DNAinfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city>] **See also EXHIBIT-A in the instant filing**. [Watts, who knew of this news item right after it published, on 3-30-2017, did not include it in his last filing, dated 4-22-2017, because he was struggling to file it in time for Judge Ball-Reed to get it before the 4-27-2017 hearing. Watts, by virtue of this statement, issues a sincere apology for his oversight & slowness here.]

Newly-discovered Eyewitness Testimony of a dispositive nature

Watts, when speaking recently by phone with Daniggelis, was told three (3) key facts about the condition of the house at 1720 N. Sedgwick, in the case at bar, which have not made it to the “ears of the court” due to the lack of legal mojo on the part of Mr. Daniggelis:

- 1) Daniggelis, who used to help his father build houses (and is an expert) told Watts that his father, when building the house, laid a foundation which is strong enough for a five (5) story house, even though the house at 1720 is only a 2-story house. This fact is relevant because Younes has repeatedly told This Court that the foundation was 'bad.' – I (the undersigned Watts) do not expect This Court to merely take my word (as this is but hearsay). However, I include this testimony from Daniggelis because it can be “helpful guidance” to This Court when asking CR Realty (and other experts in the field) to look with more-exact accuracy about the foundation. [This claim can, thus, be 'tested' by realty & building experts looking for certain things—and potentially save much money if the foundation does not need tearing up & removal/replacement.]
- 2) Daniggelis also said that when the City of Chicago was in civil court against him, recently, for building code violations, one inspector, who looked at the roof, was only able to complain that one piece of wood was turned around “backwards,” so that the label was facing the wrong way. I include this because Younes claimed that the roof have major 'leaks,' and Daniggelis, if This Court can get him to testify (and get prior City code inspectors to testify), can determine whether there were 'major' leaks (like Younes claims) or, rather, an occasional, minor leak (like Daniggelis and others apparently claim).
- 3) Daniggelis said that he was concerned that removing the roof and/or floors would make the house more unstable and susceptible to torque damage from the wind. While he could not determine the extent of the damage Younes inflicted upon the house (since he was not permitted access), I enter this into the record so that inspectors can be on the lookout for this potential danger.
- 4) I include these 3 points, supra, and the DNAinfo quote to call into question Younes' honesty, which is dispositive to This Court's dealings with him.

NOTE: While I am very disgusted with the dishonesty and recklessness which Mr. Younes has exhibited (in both code violations as well as knowingly participating in a fraud—and benefiting from it by the illicit gains of getting a house for free – without any documented payment to Daniggelis), nonetheless, I do not wish any ill or harm upon Younes, nor do I seek revenge. [In fact, in my prior sworn affidavits, I was careful to include the fact that Younes gave Daniggelis some assistance moving out by allowing his employees to help move things; moreover, while 'religion' is not germane to the matter before This Court, I was careful to recall—and attest—to how Daniggelis told me that he and Younes occasionally had conversations about religion, and both men were respectful to one another, in spite of the fact that they are members of two totally-different religions. This, of course, tells us that Younes is not totally evil, and, I hope, assures This Court that while I (the undersigned) am human, my motives are for the good.

Work done for Daniggelis

Mr. Daniggelis asked the undersigned Intervenor for assistance on a number of matters, including, but not limited to searching for, obtaining, and pass along many records (some court records, some publicly-accessible Internet records), sending them to him, and/or assistance on several unspecified technological/computer-related issues. [See also **EXHIBIT-B** in the instant filing.] If this court would be deny the instant motion, I would respectfully ask: how I might expect to get paid if Daniggelis is getting beaten up in court (house stolen from him, and then illegally destroyed –in violation of Landmark and City CODES), and my interests (to getting Daniggelis being able to avoid burdensome financial weights, that would severely restrict him) are not represented? As a side-note, This Court takes a dim view of elder abuse, and Intervenor's INTERVENTION is of assistance to This Court's desire to have all tools handy to do justice.

Here are the details of the work done, as shown in the Exhibits:

Where intervention as of right is asserted, “the trial court’s jurisdiction is limited to determining [[#1]] timeliness, [[#2]] inadequacy of representation and [[#3]] sufficiency of interest; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted.” *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984). [Enumeration and emphasis added in underline & bold; not in original] Petitioner satisfies all three requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3). [#1] This is timely; [#2] I doubt that anyone would doubt that the many new points Intervenor raises lack representation, as they are key facts that have not been addressed before, and this case could tip either way depending on my submitting (or not submitting) these key facts. However, is prong #3 satisfied?

Looking at the great financial costs Intervenor has incurred, we don't even count his own litigation (printing, service costs, and the huge time lost from working a better-paying job). But, looking solely at the FOIA and other misc. research Intervenor did for Daniggelis, and for which Daniggelis indicated he wished to pay, we see the following: \$104.68 + \$10.21 + \$21.19 + \$11.50 + \$33.19 + \$2.25 + \$13.28 + \$20.64 + \$9.60 + \$76.25 + \$6.47 + \$3.95 + \$8.88 + labour + time lost from work. This suggest that Intervenor has spent at least \$322.09, not counting huge time lost from work, gas & upkeep for his vehicle, food costs, etc. (And, were we to count the legal filings, and not just the research, estimating what a 'real' lawyer would charge to file supportive briefs – Intervenor is not a lawyer – this would drive up the costs to triple or more, since US Postal and FedEx service don't run on fairy dust.) Based on the foregoing, Intervenor has a huge interest. But – there is one more interest: Daniggelis is like a grandfather to him, and the pain he's suffered inflicts emotional harm upon Watts, in the same way were it to happen to anyone else's mother, father, uncle, grandfather, etc. Were Watts his biological kin, say, a son or daughter, Intervention solely based on emotional pain would not be questioned. #3: Lastly, Watts meets the third prong, sufficiency of interest, and should be permitted to intervene.

Of course, should the court decline to grant intervention as of right, Watts' filings might be deemed *amicus curiae*, with the good-will intentions to help the court. Indeed, *Kinkel v. Cingular Wireless, L.L.C.*, 223 Ill. 2D 1; 857 N.E.2d 250; 306 Ill.Dec. 157 (Jan. 11, 2006), holds that an *Amicus* needs merely offer helpful information that the parties have overlooked. Illinois Courts also adopt a 7th Cir. Federal Court standard in which((#1)) a party is not represented at all; ((#2)) the 'direct interest' test; or, ((#3)) the same test as above: Helpful info overlooked by the parties. NOTE: The 7th Circuit test uses the key operator “or,” meaning that any one “or” the other of the three tests need apply. See e.g., *NOW, et al. v. Scheidler, et al.*, (Nos. 99-3076, 99-3336, 99-3891 & 99-3892, 7th. Cir., Opinion July 31, 2000. But, it would appear the *amici* are disfavoured in Illinois thru some unspoken rule, so maybe this alternative should be ignored, and Intervention granted.

CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above “**Motion to Intervene by Intervenor, Gordon Wayne Watts,**” and its exhibits were delivered to the following parties as indicated – this Wednesday, the 17th day of May 2017:

* **CIVIL DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 601, **Ph: (312) 603-5116, (312) 603-5122, (312)603-5252**, Chicago, IL 60602, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

* **Hon. Patrice Munzel Ball-Reed, Associate Judge**, Civil Division, District 1 - Housing Section, Daley Center, 50 W. Washington St., Rm. 1105, Chicago, Illinois 60602, **Ph: (312) 603-4535** The number listed on Judge's page, ends in '4536': <http://www.CookCountyCourt.org/JudgesPages/BallReedPatrice.aspx> but clerk says that this is wrong number and goes to room 1107. [Note: I'm attempting to send both Judge Ball-Reed's courtesy copy and the Clerk's official copy to Emma J. Burse, Mail Room Manager (312-603-3117, EJBurse@CookCountyCourt.com), for her to deliver, since last time, my Priority mail to the judge got delayed.]

* **City of Chicago, CORPORATION COUNSEL**, 30 N LASALLE 900, CHICAGO IL, 60602, Phone: (312) 742-0200; (312) 744-7764, Attn: Greg Janes (312-744-9555) and Glenn Angel (312-744-4033) Gjanes@CityOfChicago.org, Greg.Janes@cityofchicago.org, GAngel@CityOfChicago.org, Glenn.Angel@CityOfChicago.org, Benna.Solomon@CityOfChicago.org, Edward.Siskel@CityOfChicago.org

* **Joseph Younes Law Offices** / <http://ChicagoAccidentAttorney.net> (312)635-5716, per website: 166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602; Phone: (312) 372-1122 ; Fax: (312) 372-1408. Email is (or was?) RoJoe69@yahoo.com per <http://www.ZoomInfo.com/p/JosephYounes/599467626> Note: Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see e.g., **EXHIBIT-C in the instant filing**], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr. Younes & other litigants), and send me a nominal bill for said service, but, I doubt anyone would question me on this. In fact, Younes will have to get his service copy from his attorney, Hugh Howard, who uses the same mailing address: **Younes' attorney Hugh Howard, c/o: Law Offices of Hugh D. Howard**, 166 W Washington St, Suite 600, Chicago, IL 60602, Phone | 312-781-1002, Email | Hugh@HughDHowardLaw.com, per: <http://www.HughDHowardLaw.com>

* **Heavner Beyers Mihlar LLC**, 111 E Main St #200, Decatur IL, 62523, (217) 422-1719, (312)-999-9110 [Mailing Address: P.O. Box 740, Decatur, IL 62525, per <http://www.HSBattys.com/page/about-us/>] RickHeavner@hsbattys.com, JulieBeyers@hsbattys.com, FaiqMihlar@hsbattys.com, MeredithPitts@hsbattys.com

* **CR Realty Advisors, LLC**, which has been appointed by the court as a temporary receiver on the property: 325 W. Huron, Suite 230, Chicago, IL 60654, P: 312.332.7100, F: 312.332.7102, E: info@cr-ra.com, per: <http://www.cr-ra.com/contact/>

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "**Motion to Intervene by Intervenor, Gordon Wayne Watts,**" and its exhibits, were served upon all parties listed above, this 17th day of May, 2017 by the following methods:

- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford.

- E-mail: I may, later, serve all the parties listed above via email, in such cases as I have their e-mail address—as a courtesy. Or, then again, I may not (as it is not required), but if I serve any party electronically (via email), then I will serve all parties, so as to keep everybody in the loop.

- Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra*, ~~linked~~ at the "Mortgage Fraud" story, dated. Fri. 14 Apr. 2017.

Signature:  Date: Wednesday, 17 May 2017

Gordon Wayne Watts, *Intervenor, or, in the alternative, Amicus Curiae**

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880

Web: www.GordonWatts.com / www.GordonWayneWatts.com

Email: Gww1210@aol.com / Gww1210@gmail.com

Date: Wednesday, 17 May 2017

* Watts, acting counsel of record, is not a lawyer. Per Local Rule 2.1, "Notice of Hearing of Motions," Watts, appearing *pro se*, is giving notice of his motion

INDEX TO THE EXHIBITS

Instrument

Docket/Tab#

DNAinfo news item (screenshot)

Exhibit-A

A-1 (news item title)

A-2 (section quoting Jordan Matyas, who *effectively* calls Younes a liar)

Work done for Daniggelis

Exhibit-B

FOIA research (Freedom of Information Act requests for public records—and other services)

B-1 (FOIA - 07/16/2015 grant of various Clerk of the Court, Cook Cty, IL, records)

B-2 (FOIA – 07/24/2015 bill of \$104.68 to CHANCERY Division, Cook Cty, IL, records)

B-3 (FOIA – 07/24/2015 bill of \$102.50, with date-stamp; Showing the \$104.68 before fees)

B-4 (FOIA – 07/31/2015 bill of \$10.00, before fees; Showing \$10.21 after transaction fee)

B-5 (FOIA – record: Credit Card statement, cover sheet, closing on 07/17/2015)

B-6 (FOIA – 07/16/2015, Credit Card bill for \$21.19 Cook County, IL court records)

B-7 (FOIA – 09/10/2015: \$11.50, Ship to Daniggelis via USPS)

B-8 (FOIA – 12/03/2015: bill of \$33.19 to LAW Division, Cook Cty, IL, records)

B-9 (FOIA – 01/13/2015: bill of \$2.25 to LAW Division, Cook Cty, IL, records)

B-10 (FOIA – 01/21/2015: bill of \$13.28 to CIVIL, 1st Municipl Division, Cook Cty, IL, records)

B-11 (AxiomBanking 05/17/2016 ship FOIA research via UPS to Daniggelis, \$20.64;

(AxiomBanking 05/26/2016 pay for FOIA research printouts to UPS to Daniggelis, \$9.60)

B-12 (FOIA 07/01/2016: FOIA Request from First Appellate Court, IL, acknowledging \$76.25 in fees)

B-13 (FOIA 07/01/2016: FOIA costs: \$76.25 money order; \$6.47 mailing; \$3.95 lunch break)

B-14 (FOIA replies of 06/03/2016 and 04/07/2017 from City of Chicago, Building Dept. Cost: TIME)

B-15 (FOIA reply of 06/07/2016 from City of Chicago, POLICE Department. Cost: TIME)

B-16 (FedEx shipping receipt to send FOIA research to Daniggelis: 09/15/2015, est. cost \$8.88 + labor)

B-17 (FOIA replies of May 18, May 25, June 1, June 8, 2016 from IL Office of Atty Gen; Cost: TIME)

B-18 (FOIA reply of 04/12/2017 from City of Chicago DPD e.g., Landmarks; Cost: TIME)

FedEx package refused by Atty. Joseph Younes

Exhibit-C

C-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)

C-2 (AOL email dated April 21, 2017 from FedEx showing Defendant, Younes, refused court service)

C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

[Gordon Brown's wife's personal](#) | ['Rotted' Historic Building In C...](#)

[www.dnainfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seize](#)

[www.youtube.com/user/...](#) | [extremetracking.com/for](#) | [extremetracking.com/for](#) | [support.microsoft.com/](#)

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'Rotted' Historic Building In Old Town Triangle Could Be Seized By City


 By Ted Cox | March 30, 2017 5:00pm
 | Updated on March 30, 2017 10:43pm
 @tedcoxchicago



With the steeple of St. Michael's Roman Catholic Church in the ...

[View Full Caption](#) DNainfo/Ted Cox

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OLD TOWN TRIANGLE — The city has moved to seize control of a historic landmark district building that it says has been left to rot at 1720 N. Sedgwick Ave.

"We believe that this owner is allowing the building to deteriorate so he can obtain a demolition permit," said Ald. Michele Smith

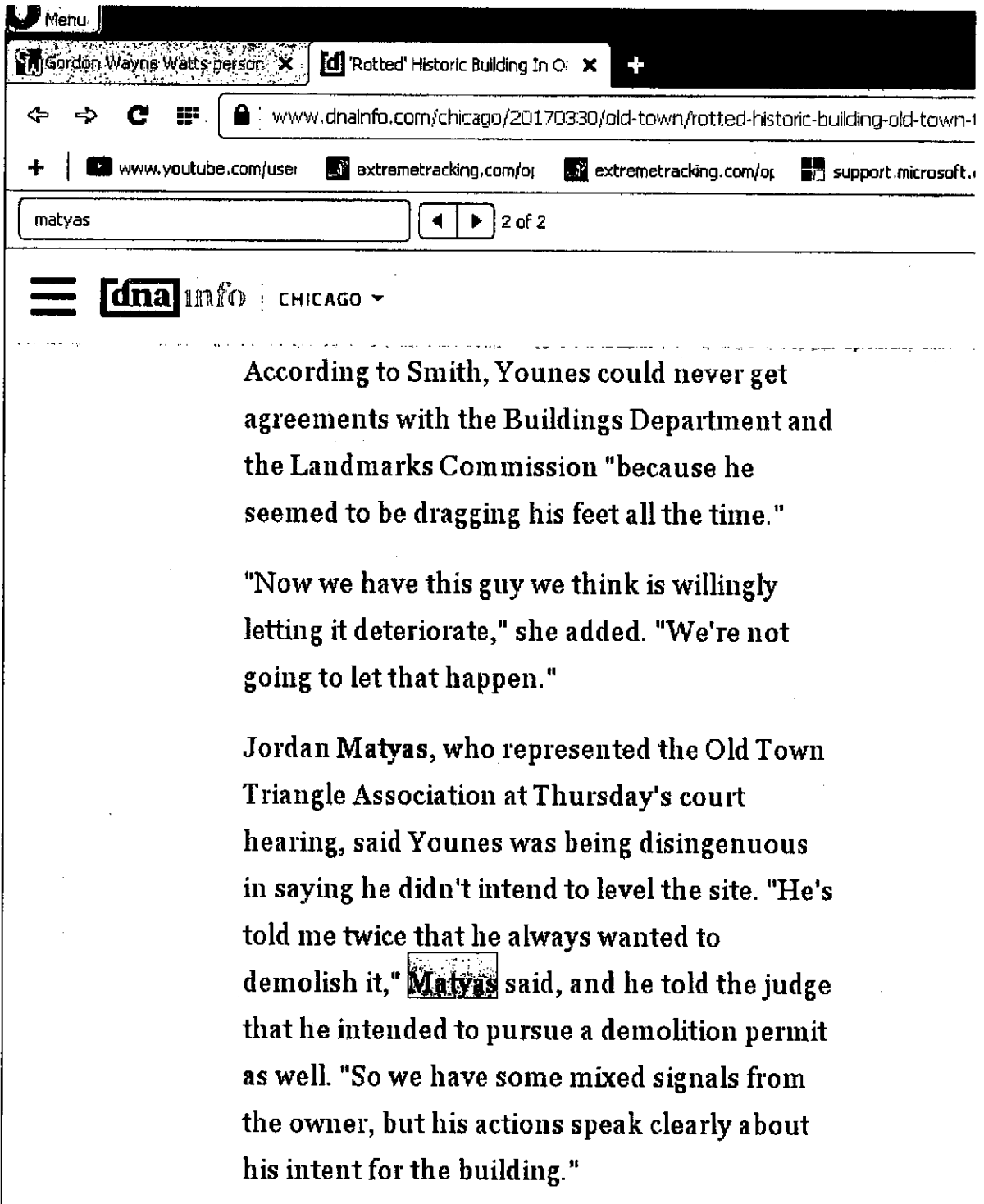
How Tall Will New Buildings in My Chicago Neighborhood Be?

Let's find out!



Recommended

A-2 (section quoting Jordan Matyas, who effectively calls Younes a liar)



Menu

Gordon Wayne Watts person × 'Rotted' Historic Building In O: × +

← → ↻ ☰ 🔒 www.dnainfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-1

+ | www.youtube.com/user/ extremetracking.com/ox extremetracking.com/ox support.microsoft.com

matyas 2 of 2

dna info | CHICAGO ▾

According to Smith, Younes could never get agreements with the Buildings Department and the Landmarks Commission "because he seemed to be dragging his feet all the time."

"Now we have this guy we think is willingly letting it deteriorate," she added. "We're not going to let that happen."

Jordan Matyas, who represented the Old Town Triangle Association at Thursday's court hearing, said Younes was being disingenuous in saying he didn't intend to level the site. "He's told me twice that he always wanted to demolish it," Matyas said, and he told the judge that he intended to pursue a demolition permit as well. "So we have some mixed signals from the owner, but his actions speak clearly about his intent for the building."

Reminder: AOL will never ask you for your password or billing information.

Subject: copies file 07ch29738,04ch10851,14m1701473
Date: 7/16/2015 12:30:29 P.M. Eastern Daylight Time
From: sdlevy@cookcourtycourt.com
To: qvw1210@gmail.com
CC: qvw1210@aol.com; emeddington@cookcourtycourt.com
Sent from the Internet (Details)

Hello Mr. Gordon,

Please see attachment,

Thank you,

Sharon Briggins – Levy
Manager Chancery Division
(312) 603 -3287

=



Quick Search:
Client ID:

lpmlment@cookcountycourt.com

Orders Fulfillment Cook Co District 1 - Chance.. (91020)

Your order has been updated.
Your order has been authorized.

Order: 50280881																																	
Order Details		Order Summary		Comments																													
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Other	0.00													
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THE HONORABLE DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
COOK COUNTY, IL

DATE: 7/24/2015 TIME: 4:16PM
TN: 0010-0001 RN: 00066575
DIST: 01 DIV: Chancery
CHNL-134 CASHIER: JESSICAP CR#: 529

ATTORNEY NO: 99500

REF CASE NO: 2004ch10851
REF OTHER: 2007CH

CASE TOTAL: \$102.50

Copy Fee

\$75.50

Record Searches

\$27.00

CREDIT CARD:

\$102.50

CHANGE

\$0.00

RECEIPT 0001 OF 0001

TRANSACTION TOTAL:

\$102.50

THANK YOU

THE HONORABLE DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
COOK COUNTY, IL

DATE: 7/31/2015 TIME: 12:00PM
TN: 0003-0001 RN: 00066663
DIST: 01 DIV: Chancery
CHN1-134 CASHIER: JESSICAP CR#: 534

ATTORNEY NO: 99500

REF CASE NO: 2007ch29738
REF OTHER:

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CREDIT CARD: \$10.00
CHANGE \$0.00

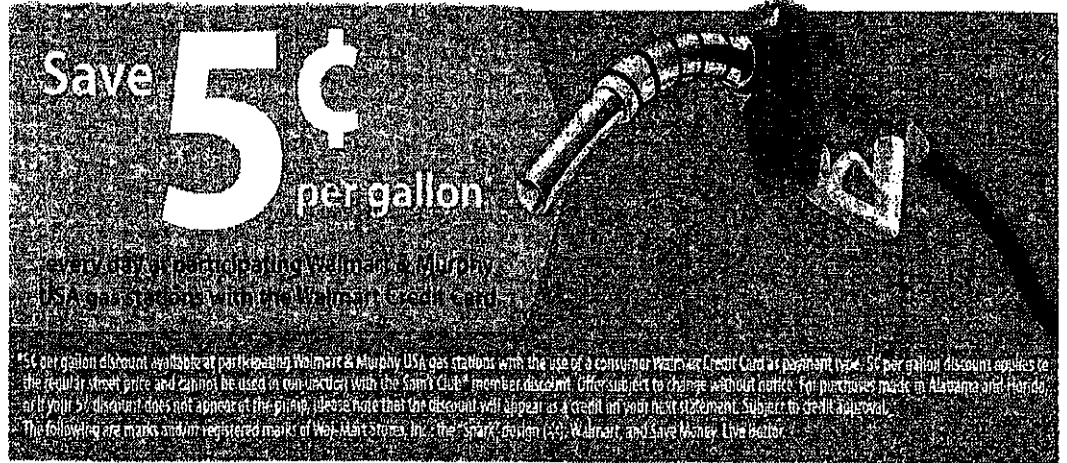
RECEIPT 0001 OF 0001
TRANSACTION TOTAL: \$10.00

THANK YOU

Status	
Order	Open
Payment	Paid In Full
Source POS	
Fee Data	
Agency	10.00
Expedite	0.00
Misc	0.00
VitalChek	0.21
Shipping	0.00
Other	0.00
Total	10.21
Print Receipt	



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Walmart® MasterCard®

GORDON W WATTS
Account Number: xxxx xxxx xxxx 2738

Visit us at walmart.com/credit
Customer Service: 1-866-611-1148

07/17/2015

Summary of Account Activity	
Previous Balance	\$4,353.74
- Payments	\$984.24
+ Purchases/Debits	\$121.07
+ Interest Charges	\$73.81
New Balance	\$3,564.38
Credit Limit	\$10,000
Available Credit	\$6,436
Cash Advance/Quick Cash Limit	\$2,000
Available Cash	\$2,000
Statement Closing Date	07/17/2015
Days in Billing Cycle	30

Payment Information	
New Balance	\$3,564.38
Total Minimum Payment Due	\$110.00
Payment Due Date	08/10/2015

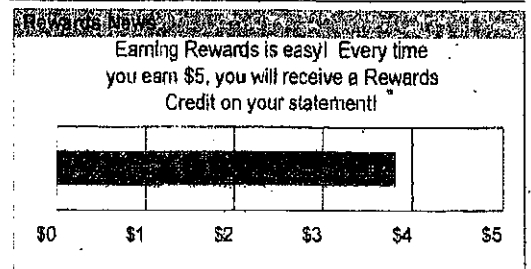
Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee up to \$36.00.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make only the minimum payment each month	It will take you to pay off this balance	And you will end up paying an extra total
Only the minimum payment	16 years	\$9,033.00
\$138.00	3 years	\$4,960.00 (Savings = \$4,073.00)

If you would like information about **credit counseling services**, call 1-877-302-8775.

Rewards Summary	
Previous Balance	\$2.60
(+) Earned This Period	\$1.20
= Balance	\$3.80

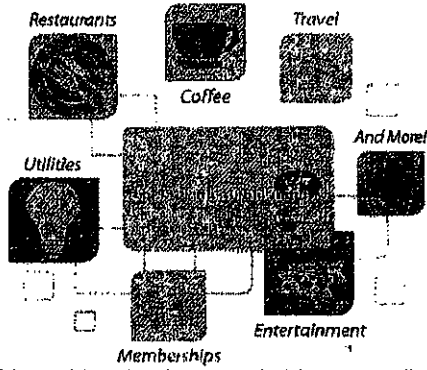


Gordon W. Watts
CREDIT CARD
STATEMENT



Use your card everywhere MasterCard® is accepted to

Earn Rewards.*



*See the "Walmart MasterCard Rewards Program" terms for details. The Walmart MasterCard is issued by Synchrony Bank pursuant to a license by MasterCard International Incorporated. MasterCard is a registered trademark of MasterCard International Incorporated. The following are marks and/or registered marks of Wal-Mart Stores, Inc.: the "Spark" design (s), Walmart, and Save Money. Live Better.

Tran	Post	Date	Reference Number	Description of Transaction or Credit	Amount
06/25	06/25		85239145H00XTMJH4	PYMNT IN STORE THANK YOU LAKELAND FL	(\$64.04)
06/28	06/26		65541065K03SNMYRL	INDO FOODMART Q30 LAKELAND FL	\$1.08
06/30	06/30		85239145N00XTMJH7	PYMNT IN STORE THANK YOU BARTOW FL	(\$57.95)
06/30	06/30		85239145N00XTMJH0	PYMNT IN STORE THANK YOU BARTOW FL	(\$500.00)
07/03	07/03		85239145S00XTMJH3	PYMNT IN STORE THANK YOU PLANT CITY FL	(\$87.63)
07/07	07/07		65410195WJ8GNAS8	FEDEX 498520395 MEMPHIS TN	\$32.36
07/08	07/08		55423505XRL52K8KE	EBAY INC 09862858350 CA	\$37.09
07/08	07/08		85239145Y00XTMJH7	PYMNT IN STORE THANK YOU LAKELAND FL	(\$84.58)
07/14	07/14		054101963MJA42K2	FEDEX 499124124 MEMPHIS TN	\$29.37
07/14	07/14		85239145400XTMJH1	PYMNT IN STORE THANK YOU LAKELAND FL	(\$150.05)
07/16	07/16		0543584680040FR0J	COOK CO FIRST MUNICIPA CHICAGO IL	\$21.19
FEES					
TOTAL FEES FOR THIS PERIOD					\$0.00
INTEREST CHARGED					
07/17	07/17			INTEREST CHARGE ON PURCHASES	\$73.81
07/17	07/17			INTEREST CHARGE ON CASH ADVANCES	\$0.00
TOTAL INTEREST FOR THIS PERIOD					\$73.81

Total Fees Charged in 2015	\$0.00
Total Interest Charged in 2015	\$401.61
Total Interest Paid in 2015	\$327.70

Type of Balance	Expiration Date	Annual Percentage Rate	Balance Subject To Interest Rate	Interest Charge
Regular Purchases	NA	22.90%	\$3,821.85	\$73.81
Cash Advances	NA	25.90%	\$0.00	\$0.00

Eligible card purchases may be billed under one of the following promotions: No Interest if Paid in Full within 6, 12, 18 or 24 months. Under each of these promotions, if the promotional balance is not paid in full within the promotional period, interest will be imposed from the date of purchase at a rate of 22.90%. If a (v) is shown after your APR in the Interest Charge Calculator section of this billing statement, the APR is a variable rate and will vary with the market based on the Prime Rate. Minimum monthly payments are required. See promotional advertising for further details.

If your account has a deferred interest promotion and you would like us to apply a payment on your account to a specific balance, please call Customer Service to discuss options that may be available.

07/16 2015

June 2015 Invoice

3 savings
 \$139
 eBay Montgomery, TX
 263-165 Headers

eBay \$137
 Jim Wacker
 Montgomery, AL
 &
 Headers
 Sasser, TX

PUBLIC RECORDS
 for
 Rick Danigglis

\$21.19
 Richard B. Danigglis? Public Record Request
 for files in 3 case of identical signatures
 in 2 warranty books showing forgery, etc

Walmart

Get up to \$100 Quick Cash* at the register with the Walmart® Credit Card.

Statement

09-17-2015



No ATM Fees

Just select the amount you need in \$20 increments using the debit reader when you're checking out.

*Get up to \$100 quick cash in \$20 increments when you make a purchase with your Walmart Credit Card at Walmart-owned registers in Walmart stores. Limit one per day. This cash advance will appear on your monthly billing statement like a purchase. Subject to credit approval. The Walmart MasterCard is issued by Synovus Bank pursuant to a license by MasterCard International Incorporated. MasterCard is a registered trademark of MasterCard International Incorporated. The following are marks and/or registered marks of Wal-Mart Stores, Inc.: the "Spark" design (SM), Walmart, and Save Money. Live Better.

Trans Date	Post Date	Reference Number	Description of Transaction or Credit	Amount
08/18	08/18	05410197M7H7NRE	FEDEX 402524334 MEMPHIS TN	\$98.01
08/24	08/24	05410197QMJB5DV86	FEDEX 402912859 MEMPHIS TN	\$150.45
08/30	08/30	85239147K00XTMJH4	PYMT IN STORE THANK YOU LAKELAND FL	(\$207.96)
09/01	09/01	05410197LMJB3XSN8	FEDEX 403554988 MEMPHIS TN	\$9.99
09/08	09/08	05410197VMJ999JE2	FEDEX 404211701 MEMPHIS TN	\$53.05
09/08	09/08	55429507WRLT7XBHQ	EBAY INC. 08952860380 CA	\$37.95
09/09	09/09	05410197X208BVBJA	FEDEXOFFICE 00008508 LAKELAND FL	\$388.21
09/10	09/10	05410197XQ8G4N7XR	USPS 11492208335710730 LAKELAND FL	\$11.50
09/10	09/10	05410197X208BZT1F	FEDEXOFFICE 00008508 LAKELAND FL	\$92.17
09/10	09/10	05410197X208BZT3R	FEDEXOFFICE 00008508 LAKELAND FL	\$4.29
09/10	09/10	05410197X208BZT48	FEDEXOFFICE 00008508 LAKELAND FL	\$4.99
09/10	09/10	85239147YCOXTMJH0	PYMT IN STORE THANK YOU LAKELAND FL	(\$92.71)
09/12	09/12	05410197ZMJVWB12	FEDEX 404600235 MEMPHIS TN	\$131.78
09/13	09/13	85239148301BRL2RD	WALMART 000779 LAKELAND FL	\$36.64
09/13	09/13	85239148100XTMJH7	PYMT IN STORE THANK YOU LAKELAND FL	(\$49.19)
09/14	09/14	054101981MJB0P80	FEDEX 404780701 MEMPHIS TN	\$18.66
09/14	09/14	054101981208BZS2S	FEDEXOFFICE 00008508 LAKELAND FL	\$2.30
09/14	09/14	054101981208BZS4Q	FEDEXOFFICE 00008508 LAKELAND FL	\$2.24
09/14	09/14	5543286200VZPT1Q	THE UPS STORE 1858 LAKELAND FL	\$25.19
09/14	09/14	0543884818PF48DV	TUJANA FLATS BURRITO LAKELAND FL	\$16.00
09/16	09/16	85239148400XTMJH2	PYMT IN STORE THANK YOU LAKELAND FL	(\$20.01)
09/17	09/17		REWARDS/SPECIAL OFFER CREDIT	(\$10.00)
			FEES	
			TOTAL FEES FOR THIS PERIOD	\$0.00
			INTEREST CHARGED	
09/17	09/17		INTEREST CHARGE ON PURCHASES	\$95.83
09/17	09/17		INTEREST CHARGE ON CASH ADVANCES	\$0.00
			TOTAL INTEREST FOR THIS PERIOD	\$95.83

Total Fees Charged In 2015	\$0.00
Total Interest Charged In 2015	\$574.67
Total Interest Paid In 2015	\$478.84

Type of Balance	Expiration Date	Annual Percentage Rate	Balance Subject To Interest Rate	Interest Charge
Regular Purchases	NA	22.90%	\$6,081.35	\$95.83
Cash Advances	NA	25.90%	\$0.00	\$0.00

Eligible card purchases may be billed under one of the following promotions: No interest if paid in full within 6, 12, 18 or 24 months. Under each of these promotions, if the promotional balance is not paid in full within the promotional period, interest will be imposed from the date of purchase at a rate of 22.90%. If a (v) is shown after your APR in the Interest Charge Calculation section of this billing statement, the APR is a variable rate and will vary with the market based on the Prime Rate. Minimum monthly payments are required. See promotional advertising for further details.

If your account has a deferred interest promotion and you would like us to apply a payment on your account to a specific balance, please call Customer Service to discuss options that may be available.

Handwritten notes: "Anici Curia", "Cherry, Cinj, Low, COURT + Envelope", "STATE + Appr", "MORTGAGE E FRUD", "Scotch Tape".

Handwritten notes: "8.99 Daniggelis", "33.73 Daniggelis", "19.32 oban", "+ 53.05".

Handwritten notes: "Print Id - Daniggelis Case", "Copy Daniggelis".

Handwritten notes: "Fax - Daniggelis Case", "To 1st Appr Court".

Handwritten calculations: "576 x 0.0966%", "= 55.30", "+ 3.87 TAX".

Handwritten total: "\$ 59.17".

Handwritten note: "Mob. Fraud Daniggelis".

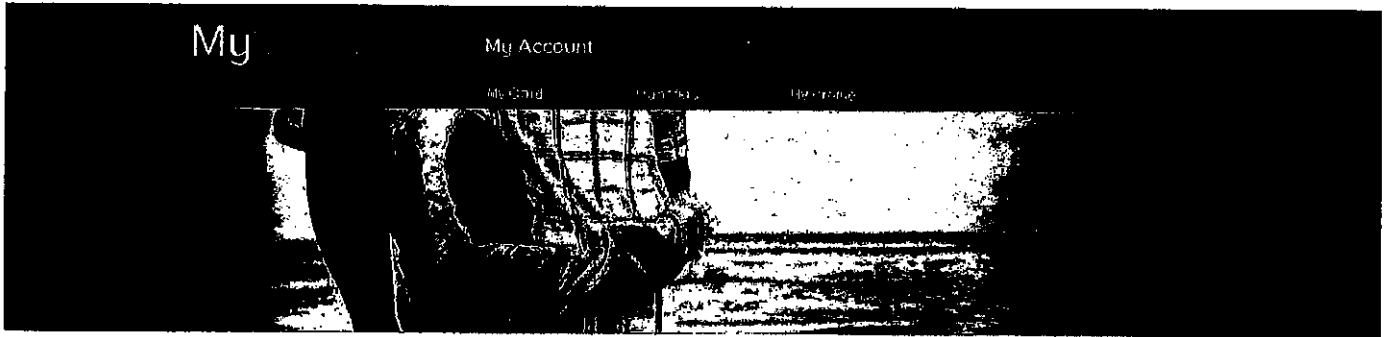
Handwritten note: "09/10/2015".

Handwritten note: "19.50 Mob. Fraud".

Handwritten notes: "131.78 S/A FedEx Express to TaskCard & Appr's Card Mob. Fraud Daniggelis".

Handwritten note: "\$11.50 Ship to Daniggelis".

Handwritten note: "Walmart: Multimeter Duct Tape, Scotch Tape".



My

My Account

Card Activity

card number xxxx-2746 expiration date 05/19 card status a

- Account
- > Card activity
- Statements
- Report lost or stolen card
- Activate a card
- Request a replacement card

Available Balance \$55.57

Pending Transactions 2 transactions

PRINT

Gordon's ledger:

96.70 pd to CVS
 -3.95 activation fee
 = \$92.75

-2.99 McD
 -0.50 Transaction Fee
 = \$86.26

-32.50 Law Division
 Public Records
 -0.50 Txn fee
 -0.69 convenience fee
 = \$55.57 Balance

- Fund
- How to Reload
- Reload Card at vanillareload.com
- Download Direct Deposit form

Manage Alerts

Sign up for direct deposit

DATE	TRANSACTION	DEBIT	CREDIT
12/03/2015	MCDONALD'S F100, LAKE LAND, FL Reference: 0400013101A7 Description: PREAUTH TRANSACTION	\$2.99	
12/03/2015	LN*COOKCOLAW/DIV/CHICAGO, IL Reference: 0600013B49FE Description: PREAUTH TRANSACTION	\$33.19	

Reference number the operator gave me: 53261672
 \$32.50 + 0.69 convenience fee = \$33.19

Date and Time Properties

Date & Time Time Zone Internet Time

Date: December 2015

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

Current month transaction history 1 transactions

ZOOM view:

12/03/2015 MCDONALD'S F100 LAKE LAND, FL \$2.99
 Reference: 0400013101A7
 Description: PREAUTH TRANSACTION

12/03/2015 LN*COOKCOLAW/DIV/CHICAGO, IL \$33.19
 Reference: 0600013B49FE
 Description: PREAUTH TRANSACTION

Reference number the operator gave me: 53261672
 \$32.50 + 0.69 convenience fee = \$33.19

Date and Time Properties

Date & Time Time Zone Internet Time

Date: December 2015

S	M	T	W	T	F	S
		1	2	3	4	5

AXIOM BANK

xiombanking.com • (800)584-0015

Jan. 13:

004461
 GORDON WAYNE WATTS
 821 ALICIA RD
 LAKELAND FL 33801-2113

SUMMARY OF YOUR ACTIVITY

STATEMENT DATE	JAN 15 16
STATEMENT NUMBER	2100653548
BEGINNING BALANCE	123.91
DEPOSIT AMOUNT	+ 377.68
WITHDRAWAL AMOUNT	- 346.89
SERVICE CHARGE	- .00
ENDING BALANCE	= 154.70

\$2.25
 Cook County, IL (COURTS)
 LAW DIVISION Public Records Request

AXIOM CHECKING	2100653548	WITHDRAWALS	DEPOSITS	BALANCE SUMMARY
ACTIVITY BEGINNING	DEC 18 15			\$ 123.91
DEC 26 DEPOSIT LAKELAND			200.00	\$ 323.91
DEC 26 RADIOSHACK COR POS		41.84		\$ 282.07
PLANT CITY FL US 442987				
*****6014 13917601				
DEC 28 THE HOME DEPOT 2 POS		79.60		\$ 202.47
LAKELAND FL US 130402				
*****8464 06098901				
DEC 28 THE HOME DEPOT 2 POS		54.24		\$ 148.23
LAKELAND FL US 171594				
*****6014 06098919				
DEC 29 AMAZON DIG689922 Misc. Paym 151221			.68	\$ 148.91
CCD 69897657D				
DEC 30 Clearpoint Finan BILL PYMNT PPD		120.00		\$ 28.91
JAN 02 WM SUPERCENTER #547-KEYS POS		19.05		\$ 9.86
PLANT CITY FL US 000005				
*****8464 99999999				
JAN 11 DEPOSIT LAKELAND			111.00	\$ 120.86
JAN 13 DEPOSIT LAKELAND			66.00	\$ 186.86
JAN 13 LN+COOKCOUNTY IL US 000005				\$ 184.61
*****8464 99999999				
JAN 14 DREILLY AUTO PARTS 467 POS		29.91		\$ 154.70
LAKELAND FL US 069245				
*****8464 05371609				

THE AVERAGE BALANCE FOR 2100653548 IN THIS STATEMENT PERIOD WAS \$ 88.17

SUMMARY OF YOUR DEPOSIT ACCOUNTS

ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
AXIOM CHECKING	2100653548	\$ 154.70	
TOTAL OF YOUR DEPOSIT ACCOUNTS		\$ 154.70	

1905 = 5 sets of
 coins & key for
 Mom's PC house -
 front door - Lock & Deadbolt

110.48 payment
 + 9.52 fee
 = \$120.00





axiombanking.com • (800)584-0015

004271

GORDON WAYNE WATTS
821 ALICIA RD
LAKELAND FL 33801-2113

SUMMARY OF YOUR ACTIVITY

STATEMENT DATE	FEB 15 16
STATEMENT NUMBER	2100653548
BEGINNING BALANCE	154.70
DEPOSIT AMOUNT	+ 261.92
WITHDRAWAL AMOUNT	- 413.39
SERVICE CHARGE	- .00
ENDING BALANCE	3.23

AXIOM CHECKING		2100653548	WITHDRAWALS	DEPOSITS	BALANCE SUMMARY
ACTIVITY BEGINNING		JAN 16 16			
JAN 21	COOK CO FIRST MUNICIPA CHICAGO IL US *****8464 99999999	POS 000000	13.28		\$ 154.70 \$ 141.42
JAN 26	DEPOSIT LAKELAND			260.00	\$ 401.42
JAN 29	AMAZON ACH/CRED IAT			1.92	\$ 403.34
FEB 01	Clearpoint Finan BILL PYMNT PFD		120.00		\$ 283.34
FEB 06	FEDEXOFFICE 00008508 LAKELAND FL US *****8464 03P	POS 000096	275.42		\$ 7.92
FEB 09	FEDEXOFFICE 00008508 LAKELAND FL US *****8464 04P	POS 000002	4.69		\$ 3.23
THE AVERAGE BALANCE FOR 2100653548 IN THIS STATEMENT PERIOD WAS \$					190.61

SUMMARY OF YOUR DEPOSIT ACCOUNTS

ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
AXIOM CHECKING	2100653548	\$ 3.23	
TOTAL OF YOUR DEPOSIT ACCOUNTS		\$ 3.23	

PUBLIC RECORDS REQUEST

Point of Sale Transaction
Cook County, IL Courts
Receipts Request
\$13.28
Cook County, IL Courts

Looks OK:
My own notes, in my own handwriting, mention this \$275.42 FedEx transaction.



B-11 (AxiomBanking 05/17/2016 ship FOIA research via UPS to Daniggelis, \$20.64;
 (AxiomBanking 05/26/2016 pay for FOIA research printouts to UPS to Daniggelis, \$9.60)

Axiom Bank

axiombanking.com • (800)584-0015

003792
 GORDON WAYNE WATTS
 821 ALICIA RD
 LAKELAND FL 33801-2113

SUMMARY OF YOUR ACTIVITY

STATEMENT DATE	JUN 15 18
STATEMENT NUMBER	2100653548
BEGINNING BALANCE	90.30
DEPOSIT AMOUNT	+ 187.17
WITHDRAWAL AMOUNT	- 150.24
SERVICE CHARGE	- .00
ENDING BALANCE	37.23

AXIOM CHECKING	2100653548	ACTIVITY BEGINNING	MAY 14 18	WITHDRAWALS	DEPOSITS	BALANCE SUMMARY
MAY 14	3501 FLORIDA AVE	LAKELAND FL US	ATM 001542		90.00	\$ 90.30
MAY 17	THE UPS STORE 2872	CHICAGO IL US	POS 000008	20.64		\$ 69.66
MAY 18	DEPOSIT LAKELAND				95.00	\$ 164.66
MAY 26	THE UPS STORE 1053	CHICAGO IL US	POS 000000	9.60		\$ 155.06
MAY 31	AMAZON DIG738757 Misc. Paym	CCD 76149970D	160521		2.17	\$ 157.23
MAY 31	Clearpoint Finan BILL PYMNT PPD			120.00		\$ 37.23
THE AVERAGE BALANCE FOR 2100653548 IN THIS STATEMENT PERIOD WAS \$						86.33

SUMMARY OF YOUR DEPOSIT ACCOUNTS

ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
AXIOM CHECKING	2100653548	\$ 37.23	
TOTAL OF YOUR DEPOSIT ACCOUNTS		\$ 37.23	

Banking and More

Printouts for
 Rick Daniggelis
 Mortgage front Docs

POS =
 "POINT of
 Sale
 Transaction"

Ship some research of records to Rick Daniggelis
 UPS Store # 2872 (Chicago, IL) \$ 20.64
 Pay for Printouts of more RECORDS research
 UPS Store # 1053 (Chicago, IL) \$ 9.60 !!

via USPS - 7/1/16 (G.W.)
7015-1730-0001 - 2318-4603

Receipt
9590-9403-0734-5196123868

From the Desk of: Gordon Wayne Watts
821 Alicia Road - Lakeland, FL 33801-2113
H: (863) 688-9880 - C: (863) 409-2109 - W: (863) 686-3411 or: (863) 687-6141
Email: gww1210@aol.com / Gww1210@gmail.com
Web: www.GordonWatts.com / www.GordonWayneWatts.com

Hon. Tina M. Schillaci, Esq., Law Clerk / Staff Appellate Attorney. (312) 793-6199
c/o 1st District Appellate Court, Clerk's Office
160 North LaSalle St., Chicago, IL 60601-3130
(312) 793-5484, Office Hours: 8:30am - 4:30pm (CST)

Home Copy

Re: GMAC Mortgage, LLC v. Richard B. Daniggelis, et al.
Case No: 1-14-2751
Ally Joseph Younes, Esq. v. Richard B. Daniggelis, et al.
Case No: 1-15-0662

Friday, 01 July 2016
Axiom Bank
Pd by Money Order # 41742051

Dear Attorney Schillaci:

Bank Act #
2001 653548

07/01/2016
Acct # 28175000 + \$ 76.25

Thank you for speaking with me last Friday morning (Fri. 24 June 2016) and this past Tuesday evening (Tue. 28 June 2016), and giving me the proper protocol and procedures for making a records request of court filings in your court with regard to the two court cases cited above. I am sorry that I am somewhat slow to respond, but I have been busy with many things recently.

According to my recollection and notes, it would appear that you told me that the entire file in 1-14-2751 contained 172 pages, which, at \$0.25/page, would cost me \$43.00 even, and that 1-15-0662 contained 133 pages, which would cost me \$33.25, for a sum total of \$76.25, and that your court only accepted payment by cash, check, or money order, payable to "Clerk of the Appellate Court" (but had not yet set up payment by credit card or bank account electronic draft), and, also, that your court did not prefer to deal in case for obvious reasons of security and documentation of the currency. - You also said that if I were short, you could not advance credit, and would require payment in advance. - Moreover, my notes reflect that if the opposite was the case (overpayment), you warned and cautioned me that your court could not issue any refund of excess payment, not even were I to include cash currency as part of all of the payment method, as your court's policy also prohibited sending cash by mail as well.

Because of that, I must get the payment amount "exact" or else risk over-payment (with no avenue or means for giving me change back for overpayment) or under-payment (where I can't get all the records I seek). For that reason, I made a call to your court to ascertain & determine whether any new filings or court orders had been entered into the record on appeal in either of the 2 above-captioned cases. After several unsuccessful tries (one time, a clerk said a motion was due on a certain date, but never answered my question about one case, and then hung up before I could inquire about the other case - meaning, she never answered me at all!), I finally determined that nothing new had been entered in either of these 2 cases since we spoke last week.

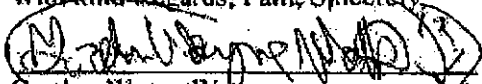
I wish you the best in getting your court set up for electronic payment (of "records request" fees) by Credit Card; electronic release of records (by email in PDF or image format in email attachments, like the trial courts currently do); and online dockets (preferably with click-to-see of an image of the docket entry, but at least a docket of the entries, like the trial courts currently provide the public).

Please find, enclosed a money order for \$76.25 for the file in both cases.

7015-1730-0001 -

2318-4603
With kind Regards, I am, Sincerely

USPS 07-01-2016 (Friday)


Gordon Wayne Watts

Bank Act #
2001 653548
Money Order # 41742051 (Axiom Bank)
Acct # 28175000
Money Order # 41742051
07-01-2016 for \$ 76.25

Return Receipt. 9590-9403-0734-5196123868

B-13 (FOIA 07/01/2016: FOIA costs: \$76.25 money order; \$6.47 mailing; \$3.95 lunch break)

(Gordon Watts)

Money Order
MONEY ORDER

07/01/2016

Gordon Watts

41742051

76.25

CUSTOMER COPY

Gordon Watts	41742051	07/01/2016	\$76.25
Money	28175000		

2001653548

28175000

CASH (Gordon Watts)

NONNEGOTIABLE

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

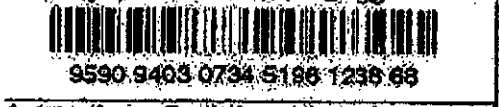
A. Signature *[Signature]* Agent

B. Received by (Printed Name) Addressee

C. Date of Delivery

1. Article Addressed to: *Attn: At. Tom Schlosky Esq.*
 c/o 1st District Appellate Court
 CLERK'S OFFICE
 160 North LaSalle Street
 Chicago, IL 60601-3130

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No



3. Service Type

Adult Signature Priority Mail Express

Adult Signature Restricted Delivery Registered Mail

Certified Mail Registered Mail Restricted Delivery

Certified Mail Restricted Delivery Return Receipt for Merchandise

Collect on Delivery Signature Confirmation

Collect on Delivery Restricted Delivery Signature Confirmation Restricted Delivery

Insured Mail

Insured Mail Restricted Delivery (over \$500)

2. Article Number (Printed on mailpiece)
 15 1730 0001 2318 4603

1 - Kitcher

07/01/2016
 1:13 PM
 Jaquan
 NU139
 Check: 10040

PS Form 3811, April 2015 PSN 7530-02-000-8063

Domestic Return Receipt

11065 863 603 9224

U.S. Postal Service
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®

CHICAGO, IL 60601

Permitted Mail Fee	\$3.30
Extra Services & Fees (where Applicable, add tax)	\$7.70
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> First-Class Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.47
Total Postage and Fees	\$6.47

Postmark: CHICAGO, IL 07/01/2016

Send To: *Attn: Tom Schlosky Esq. c/o 1st Dist. Appellate Court*
 Street and City, St., Zip+4
 160 North LaSalle Street
 Chicago, IL 60601-3130

7015 1730 0001 2318 4603

1 Anne Jean ChzBgr
 1 Banana - SM

TOTAL: \$3.95

Waikua

B-14 (FOIA replies of 06/03/2016 and 04/07/2017 from City of Chicago, Building Dept. Cost: TIME)

5/16/2017

Re: *Public Records request BUILDING Dept - City of Chicago*

From: DOBFOIA <DOBFOIA@cityofchicago.org>

To: Gww1210 <Gww1210@aol.com>

Subject: Re: *Public Records request BUILDING Dept - City of Chicago*

Date: Fri, Jun 3, 2016 9:41 am

Attachments: 1720_N_Sedgwick.pdf (266K)

Mr. Watts:

The records you requested are attached.

Sincerely,

C. Lynch
City of Chicago, Dept. of Buildings

gDept-FOIA-more-RECORDS_PDF.pdf - Adobe Reader

Window Help



Tools St

5/16/2017

Re: *Public Records request: BUILDING Dept - City of Chicago*

From: DOBFOIA <DOBFOIA@cityofchicago.org>

To: gww1210 <gww1210@aol.com>

Subject: Re: *Public Records request: BUILDING Dept - City of Chicago*

Date: Fri, Apr 7, 2017 4:59 pm

Attachments: 1720_N_Sedgwick1.pdf (17K), 1720_N_Sedgwick.pdf (17K)

Mr. Watts:

Regarding your question as to whether there were any photos taken of the Stop Work Orders for 1720 N. Sedgwick, I have attached the latest records I have for this address.

Sincerely,

C. Lynch
City of Chicago, Dept. of Buildings

From: gww1210@aol.com <gww1210@aol.com>

Sent: Friday, March 31, 2017 12:44:59 PM

To: DOBFOIA; DOB-info

Cc: DOBFOIA; Lynch, Chris; Porche, Rodney; gww1210@aol.com; gww1210@gmail.com

Subject: Re: *Public Records request: BUILDING Dept - City of Chicago*

Chris, this is Gordon again.

I hate to bother you, but these criminals that have been trying to destroy the house at 1720 North Sedgwick Street, Old Towne, Chicago, IL (and resultantly make you all very busy, w y'all have to repeatedly put up "Stop Work Order" signs to put a stop to the illegal construction, demolition, & destruction of property), and I feel the need to do more news coverage.

5/18/2017

FW: Scanned from a Xerox multifunction device

From: FOIA <foia@chicagopolice.org>

To: Gww1210 <Gww1210@aol.com>

Subject: FW: Scanned from a Xerox multifunction device

Date: Tue, Jun 7, 2016 6:00 pm

Attachments: Scanned from a Xerox multifunction device001.PDF (2172K)

Good Afternoon,

Attached to this email is a response to your FOIA request.

Regards,

FOIA Section

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering that message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this document is strictly prohibited.

From: xerox@chicagopolice.org [xerox@chicagopolice.org]

Sent: Tuesday, June 07, 2016 5:56 PM

To: FOIA

Subject: Scanned from a Xerox multifunction device

Please open the attached document. It was scanned and sent to you using a Xerox multifunction device.

Attachment File Type: PDF

multifunction device Location: machine location not set

Device Name: HQ-X414NE-1

For more information on Xerox products and solutions, please visit <http://www.xerox.com>

B-16 (FedEx shipping receipt to send FOIA research to Daniggelis: 09/15/2015, est. cost \$8.88 + labor)



September 18, 2015

Dear Customer:

The following is the proof-of-delivery for tracking number 781311007128.

Delivery Information:

Status:	Delivered	Delivery location:	333 W NORTH AVE Chicago, IL 60610
Signed for by:	JBLASSINGILL	Delivery date:	Sep 15, 2015 13:51
Service type:	FedEx Ground		
Special Handling:			

Fed Fed Fed Fed Fed
 Fed Fed Fed Fed Fed
 Fed Fed Fed Fed Fed
 Fed Fed Fed Fed Fed
 Fed Fed Fed Fed Fed
 Fed Fed Fed Fed Fed
 Fed Fed Fed Fed Fed
J. BLASSINGILL
#28 13:48 1 Del, 0 NonDel

Shipping Information:

Tracking number:	781311007128	Ship date:	Sep 10, 2015
		Weight:	1.6 lbs/0.7 kg

Recipient:
 Richard B Daniggelis
 c/o The UPS Store
 333 W North Ave
 Chicago, IL 60610 US

Shipper:
 Gordon Watts
 Gordon Watts
 821 ALICIA RD
 LAKELAND, FL 33801 US

Thank you for choosing FedEx.

B-17 (FOIA replies of May 18, May 25, June 1, June 8, 2016 from IL Office of Atty Gen; Cost: TIME)

18/2017

Freedom of Information Act Request 2016 FOIA 41830

From: FOIAofficer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Possley, Maura <MPossley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

Date: Wed, May 18, 2016 12:45 pm

Attachments: 41830 Partial Closing and Extension Letter.pdf (71K)

Dear Mr. Watts:

Attached please find a letter pertaining to your recent FOIA request.

Very truly yours,

Caitlin Q. Knutte
FOIA Officer
Assistant Attorney General
Office of the Illinois Attorney General

E-MAIL CONFIDENTIALITY NOTICE: This electronic mail message, including any attachments, is for the intended recipient(s) only. This e-mail and any attachments might contain information that is confidential, legally privileged or otherwise protected or exempt from disclosure under applicable law. If you are not a named recipient, or if you are named but believe that you received this e-mail in error, please notify the sender immediately by return e-mail and promptly delete this e-mail and any attachments and copies thereof from your system. If you are not the intended recipient, please be aware that any copying, distribution, dissemination, disclosure or other use of this e-mail and any attachments is unauthorized and prohibited. Your receipt of this message is not intended to waive any applicable privilege or claim of confidentiality, and any prohibited or unauthorized disclosure is not binding on the sender or the Office of the Illinois Attorney General. Thank you for your cooperation.

From: FOIAofficer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Possley, Maura <MPossley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Date: Wed, May 25, 2016 4:21 pm

Attachments: 41830 RM - Paul Shelton.pdf (1861K), 41830 Confirm 5.19.16 Convo, Partial Closing and Extension Letter.pdf (134K)

Dear Mr. Watts:

Attached please find a letter and records pertaining to your recent FOIA request.

Very truly yours,

Caitlin Q. Knutte
FOIA Officer

From: FOIAofficer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Possley, Maura <MPossley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

Date: Wed, Jun 1, 2016 1:13 pm

Attachments: 41830 RM - Gordon Watts 2016 (1).pdf (5295K), 41830 RM - Gordon Watts 2016 (2).pdf (5864K), 41830 Partial Closing and Extension Letter.pdf (113K)

Dear Mr. Watts:

Attached please find a letter and records pertaining to your recent FOIA request.

Very truly yours,

Caitlin Q. Knutte
FOIA Officer

From: FOIAofficer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Possley, Maura <MPossley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

Date: Wed, Jun 8, 2016 2:29 pm

Attachments: 41830 RM - Joseph Younes.pdf (3296K), 41830 RM - Pleadings (41830 RM - Pleadings (2)).pdf (2284K), 41830 RM - Pleadings (3)



DEPARTMENT OF PLANNING AND DEVELOPMENT
CITY OF CHICAGO

April 12, 2017

Gordon Wayne Watts
The Register
821 Alicia Road
Lakeland, FL 33801

VIA ELECTRONIC MAIL: Gww1210@acl.com

Dear Mr. Watts:

On behalf of the Department of Planning and Development (DPD), please be advised we are in receipt of your Freedom of Information Act (FOIA) request. Your request was dated and received on April 7, 2017. Specifically, the FOIA states and seeks the following request for public records:

Please email me an audio file of the "Regular Meeting" of the Commission on Chicago Landmarks, which occurred yesterday, Thursday, April 6, 2017 at 12:45 p.m. in City Hall, 121 North LaSalle Street, Room 201-A, 2nd Floor.

Enclosed for your review is the CD disc of the audio file from the April 6, 2017 Commission on Chicago Landmarks meeting.

Sincerely,


Tony Binns
Freedom of Information Officer
City of Chicago Department of Planning and Development
(312) 744-0986

C-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)



April 26, 2017

Dear Customer:

The following is the proof-of-delivery for tracking number 7862-7122-6226.

Delivery Information:

Status:	Delivered	Delivery location:	821 ALICIA RD Lakeland, FL 33801
Signed for by:	Signature not required	Delivery date:	Apr 26, 2017 09:53
Service type:	FedEx Ground		
Special Handling:			

NO SIGNATURE REQUIRED

Proof-of-delivery details appear below; however, no signature is available for this FedEx Ground shipment because a signature was not required.

Shipping Information:

Tracking number:	7862-7122-6226	Ship date:	Apr 18, 2017
		Weight:	1.8 lbs/0.8 kg

Recipient:
JOSEPH YOUNES LAW OFFICES
JOSEPH YOUNES LAW OFFICES
166 W WASHINGTON ST
STE 600
CHICAGO, IL 60602 US

Shipper:
gordan watts
gordan watts
821 ALICIA RD
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT-FIRST DISTRICT

425
457

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,

No: 17 MI 400775

v. JOSEPH YOUNES

Re: 1720 N. SEDGWICK ST

et al.,
Defendant(s).

Courtroom 11 @ Richard J. Daley Center

ORDER

This cause coming to be heard on the set call, the Court having jurisdiction over the below-named defendant(s) and the subject matter, being fully advised in the premises, and having heard evidence and testimony:

IT IS HEREBY ORDERED THAT: YOUNES & RECIEVER

- MUST SCHEDULE & BE PRESENT FOR AN INTERIOR & EXTERIOR INSPECTION WITH DEPARTMENT OF BUILDINGS BEFORE THE NEXT COURT DATE.
- RECIEVER TO PROCEED WITH STORING PER BIDS SECURED.
- RECIEVER TO ADJUST THE STORING TO ALLOW NEIGHBOR TO SPRINKLE LAWN.
- OWNER
• MUST KEEP PROPERTY CLEAN.

IT IS FURTHER ORDERED THAT this cause be continued to 7 / 13 / 2017 at 11:00 (a.m.) p.m.,
Courtroom 11 25, Richard J. Daley Center, 50 W. Washington St., Chicago, without further notice.

HEARING DATE: 5 / 18 / 17

By: [Signature]
Attorney for Plaintiff
Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602 (312) 744-8791

Associate Judge
Patrice Hall-Reed
Nov 15 2017
Judge BRUCE REED Courtroom 11 25
Circuit Court - 1987

Pink Copy for Defendant(s) (photocopy if required)

Yellow Copy for City of Chicago Department of Law

White Original for Court Records

3

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
Municipal Department – District 1 - Housing Section

CITY OF CHICAGO
Plaintiff,

vs.

1720 N SEDGWICK ST, ASSOCIATED BANK NA,
NON-RECORD CLAIMANTS, UNKNOWN OWNERS,
Atty. Joseph Younes, Esq., et al.
Defendants, and

Gordon Wayne Watts,
Proposed Intervening Defendant.

Case No.: 2017-M1-400775

Before: Hon. PATRICE MUNZEL
BALL-REED, Associate Judge
Case Type: HOUSING
District: First Municipal

TIME-SENSITIVE: to be heard
in Court Room: 1105, by 07/13/2017
Court Time: 11:00am (CST)

3303
3390
2870
3004

Notice of Motion

To: This Honourable Court and all parties being served (see attached service list, below)
From: Mr. Gordon Wayne Watts, LAKELAND, Fla. (full contact data, below)

Notice Proper: Pursuant to Local Rule 2.1 ["Notice of Hearing of Motions"], the undersigned movant is hereby giving this honourable court and all parties proper notice of the "MOTION TO BE HEARD BY INTERVENOR, GORDON WAYNE WATTS," filed on 05/17/2017, and docketed on 05/18/2017 as "MOTION FILED," by "Attorney: PRO SE." Due to unfamiliarity with this very uncommon "local rule," movant did not give proper "notice" of the motion, via the "notice of motion," in accordance with said local rule, which is peculiar to this court alone.

Moreover: As This Court can see, the FedEx priority overnight package containing the filing was promised / scheduled to be delivered to This Court by 10:30am (Exhibit-A), this past Thursday, 05/18/2017, in order to be available for the judge to review it by the 11:00am court time, in courtroom 1105. **However, due to unforeseen circumstances outside the control of (and thus through no fault of) this undersigned litigant** (reported to be snow storms in one of the FedEx stations), the package did not arrive until 12:50pm (CST) that day. (See generally Exhibit-A and Exhibit-B) Thus, it is impossible for This Court to have ruled on the matter (as it did not have, before it, said filing). But, it is reported that most or all other litigants got their service copies by court time (at least the electronically-served copied via email), and it is also reported that this matter was superficially discussed in open court that day (and possibly 'struck' for lack of "notice of motion" and/or physical *in propia persona* appearance—although it's not known how it could be ruled on if it had not yet arrived). **Therefore, pursuant to R.2.1, proper notice is being given of the above-mentioned motion.**

*** Details:** Normally, a notice of motion contains a promise for the movant to appear as such-and-such time in such-and-such courtroom to present the motion: "Please take notice that on (certain date) and at (certain time), I shall appear before (named judge) – or any other judge, as may be holding court, in his/her absence – in (certain courtroom) to present (certain motion), which is attached hereto."

The undersigned Movant understands the value and importance of *in propia persona* physical appearance (to be available, for example, to answer any questions in real time, as well as connect name & face). However, physical appearance (as is normally done) is **mathematically impossible**, and yet **Due Process** requires that This Court consider the matter on the merits, so notice is given – *with arguments for an alternative*.

Problem: Movant lives in a far, distant locale called "Lakeland, Florida" (which is squarely between Tampa

Newly-discovered Eyewitness Testimony of a dispositive nature

Watts, when speaking recently by phone with Daniggelis, was told three (3) key facts about the condition of the house at 1720 N. Sedgwick, in the case at bar, which have not made it to the "ears of the court" due to the lack of legal mojo on the part of Mr. Daniggelis:

- 1) Daniggelis, who used to help his father build houses (and is an expert) told Watts that his father, when building the house, laid a foundation which is strong enough for a five (5) story house, even though the house at 1720 is only a 2-story house. This fact is relevant because Younes has repeatedly told This Court that the foundation was 'bad.' – I (the undersigned Watts) do not expect This Court to merely take my word (as this is but hearsay). However, I include this testimony from Daniggelis because it can be "helpful guidance" to This Court when asking CR Realty (and other experts in the field) to look with more-exact accuracy about the foundation. [This claim can, thus, be 'tested' by realty & building experts looking for certain things—and potentially save much money if the foundation does not need tearing up & removal/replacement.]
- 2) Daniggelis also said that when the City of Chicago was in civil court against him, recently, for building code violations, one inspector, who looked at the roof, was only able to complain that one piece of wood was turned around "backwards," so that the label was facing the wrong way. I include this because Younes claimed that the roof have major 'leaks,' and Daniggelis, if This Court can get him to testify (and get prior City code inspectors to testify), can determine whether there were 'major' leaks (like Younes claims) or, rather, an occasional, minor leak (like Daniggelis and others apparently claim).
- 3) Daniggelis said that he was concerned that removing the roof and/or floors would make the house more unstable and susceptible to torque damage from the wind. While he could not determine the extent of the damage Younes inflicted upon the house (since he was not permitted access), I enter this into the record so that inspectors can be on the lookout for this potential danger.
- 4) I include these 3 points, supra, and the DNAinfo quote to call into question Younes' honesty, which is dispositive to This Court's dealings with him.

NOTE: While I am very disgusted with the dishonesty and recklessness which Mr. Younes has exhibited (in both code violations as well as knowingly participating in a fraud—and benefiting from it by the illicit gains of getting a house for free – without any documented payment to Daniggelis), nonetheless, I do not wish any ill or harm upon Younes, nor do I seek revenge. [In fact, in my prior sworn affidavits, I was careful to include the fact that Younes gave Daniggelis some assistance moving out by allowing his employees to help move things; moreover, while 'religion' is not germane to the matter before This Court, I was careful to recall—and attest—to how Daniggelis told me that he and Younes occasionally had conversations about religion, and both men were respectful to one another, in spite of the fact that they are members of two totally-different religions. This, of course, tells us that Younes is not totally evil, and, I hope, assures This Court that while I (the undersigned) am human, my motives are for the good.

Work done for Daniggelis

Mr. Daniggelis asked the undersigned Intervenor for assistance on a number of matters, including, but not limited to searching for, obtaining, and pass along many records (some court records, some publicly-accessible Internet records), sending them to him, and/or assistance on several unspecified technological/computer-related issues. [See also **EXHIBIT-B** in the instant filing.] If this court would be deny the instant motion, I would respectfully ask: how I might expect to get paid if Daniggelis is getting beaten up in court (house stolen from him, and then illegally destroyed –in violation of Landmark and City CODES), and my interests (to getting Daniggelis being able to avoid burdensome financial weights, that would severely restrict him) are not represented? As a side-note, This Court takes a dim view of elder abuse, and Intervenor's INTERVENTION is of assistance to This Court's desire to have all tools handy to do justice.

E-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

FedEx RETURN TO SHIPPER

Dear Customer - This package is being returned because:

Held at Location - Expired.

Delivery refused by: JOE

Because:

- Incorrect delivery address/Recipient unknown/Closed.
- Damaged. An inspection report has been completed.
 - The entire contents of the package are enclosed.
 - Damaged contents were discarded. The balance is enclosed.
- Package is greater than the maximum size/weight allowed.
- Delivery attempts unsuccessful/unable to reach recipient for alternate delivery instructions.
- Improper HazMat packaging/labeling/documentation, ATTN FedEx Personnel: Attach the OP-606 & SF-136 to all Hazmats.
- Other:

Package received on trailer from shipper:

- Crushed
- Wet
- Oversize
- Open
- Inadequate Packaging
- Overweight

FROM: Joseph Younes (609) 467-6226
LAKELAND, FL 33801

TO: Joseph Younes (609) 467-6226

DATE: 4-21-17

STATION: 606

REASON: 3380

MANAGEMENT SIGNATURE: [Signature]

RETURN STATE: FL

RETURN ZIP: 33801

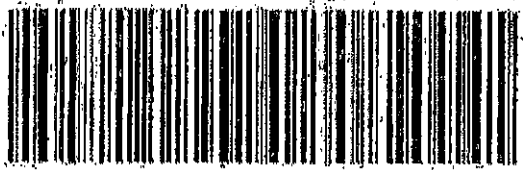
Remove label here

7862 7122 6226

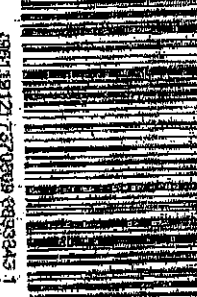
4-21-17

60602

9622 0477 8 (000 000 0000) 0 00 7862 7122 6226



Joseph Younes Law Offices
166 W WASHINGTON ST.
Phone: (312) 372-1122, Fax
Email is (or was?) 606-659



9622 0477 8 (000 000 0000) 0 00 7862 7122 6226

220-1580

60602-2117

JOSEPH YOUNES LAW OFFICES

SMITHSONIAN ENVIRONMENTAL SCIENCE CENTER

1201

N.P.

FACILITY

Reminder: AOL will never ask you for your password or billing information. [Show Images](#) [Enable Links](#)

Subject: FedEx Shipment 786271226226 Delivery Exception
Date: 4/21/2017 10:24:48 P.M. Eastern Daylight Time
From: trackingupdates@fedex.com
Reply To: trackingupdates@fedex.com
To: jbyoune1@aol.com
 Sent from the Internet (Details)

Tracking # 786271226226

Ship date: Tue, 4/18/2017

Scheduled delivery: Mon, 4/24/2017 by end of day

Delivery exception

Shipment Facts

FedEx attempted, but was unable to complete delivery of the following shipment:

Tracking number: 786271226226
Status: Delivery exception
Service type: FedEx Ground
Packaging type: Package
Number of pieces: 1
Weight: 0.70 lb.
Standard transit: 4/21/2017

Resolving Delivery Issues

The reason delivery was not completed is outlined below. Where applicable, resolution recommendations are also provided.

Exception Reason	Recommended Action
1. Refused by recipient - Not ordered	No action is required. The package is being returned to the shipper.
2. Shipment Refused by Recipient	No action is required. The package is being returned to the shipper.



April 26, 2017

Dear Customer:

The following is the proof-of-delivery for tracking number 7862-7122-6226.

Delivery Information:

Status:	Delivered	Delivery location:	821 ALICIA RD Lakeland, FL 33801
Signed for by:	Signature not required	Delivery date:	Apr 26, 2017 09:53
Service type:	FedEx Ground		
Special Handling:			

NO SIGNATURE REQUIRED

Proof-of-delivery details appear below; however, no signature is available for this FedEx Ground shipment because a signature was not required.

Shipping Information:

Tracking number:	7862-7122-6226	Ship date:	Apr 18, 2017
		Weight:	1.8 lbs/0.8 kg

Recipient:
JOSEPH YOUNES LAW OFFICES
JOSEPH YOUNES LAW OFFICES
166 W WASHINGTON ST
STE 600
CHICAGO, IL 60602 US

Shipper:
gordan watts
gordan watts
821 ALICIA RD
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 1

**UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

HERBERT RARR TWILIE COURT OF APPEALS BUILDING
56 Forsyth Street, N.W.
Atlanta, Georgia 30303

John Ley
Clerk of Court

For rules and forms visit
www.e11.uscourts.gov

January 06, 2015

Anthony Citro
254 SW 7TH ST
DANIA, FL 33004-3948

Gordon Wayne Watts
821 ALICIA RD
LAKELAND, FL 33801-2113

Appeal Number: 14-14061-AA ; 14-14066 -AA
Case Style: James Brenner, et al v. John Armstrong, et al
District Court Docket No: 4:14-cv-00107-RH-CAS

This Court requires all counsel to file documents electronically using the Electronic Case Files ("ECF") system, unless exempted for good cause.

The enclosed order has been ENTERED.

Sincerely,

JOHN LEY, Clerk of Court

Reply to: David L. Thomas, AA/tvg
Phone #: (404) 335-6169

MOT-2 Notice of Court Action

Case: 14-14061 Date Filed: 01/06/2015 Page: 2 of 2

ORDER:

Clare Anthony Citro's motions for leave to file out of time and for leave to file a brief as *amicus curiae* are DENIED.

Gordon Wayne Watts's motion for leave to file an amended *amicus curiae* brief is GRANTED.


UNITED STATES CIRCUIT JUDGE

Court ruling & docketing information in the recent "Gay Marriage" case, heard before
the U.S. 11th Circuit FEDERAL Court of Appeals, in Atlanta, Georgia Exhibit-D (1st of 3 pages)

[January 06, 2015 Order of Hon. Beverly B. Martin, Federal Cir. Judge granting Mr. Gordon Wayne
Watts' (Pro Se) motion for leave to file an amended *Amicus Curiae* brief and denying Mr. Anthony Clare
Citro's (Pro Se) motions for leave to file out of time and for leave to file as *Amicus Curiae*]

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 2

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

No. 14-14061-AA

JAMES DOMER BRENNER, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

No. 14-14066-AA

SLOAN GRIMSLEY, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

Appeals from the United States District Court
for the Northern District of Florida

Case law citations to the "Terri Schiavo"
(aka: the Florida 'feeding tube girl') case

Exhibit-C

* *In Re: GORDON WAYNE WATTS (as next friend of THERESA MARIE 'TERRI' SCHIAVO)*, No. SC03-2420 (Fla. Feb.23, 2005), denied 4-3 on rehearing. (Watts got 42.7% of his panel)
<http://www.FloridaSupremeCourt.org/clerk/dispositions/2005/2/03-2420reh.pdf>

* *In Re: JEB BUSH, GOVERNOR OF FLORIDA, ET AL. v. MICHAEL SCHIAVO*, *GUARDIAN: THERESA SCHIAVO*, No. SC04-925 (Fla. Oct.21, 2004), denied 7-0 on rehearing. (Bush got 0.0% of his panel before the same court)
<http://www.FloridaSupremeCourt.org/clerk/dispositions/2004/10/04-925reh.pdf>

* *Schiavo ex rel. Schindler v. Schiavo ex rel. Schiavo*, 403 F.3d 1223, 2005 WL 648897 (11th Cir. Mar.23, 2005), denied 2-1 on appeal. (Terri Schiavo's own blood family only got 33.3% of their panel on the Federal Appeals level)
<http://Media.ca11.UsCourts.gov/opinions/pub/files/200511556.pdf>

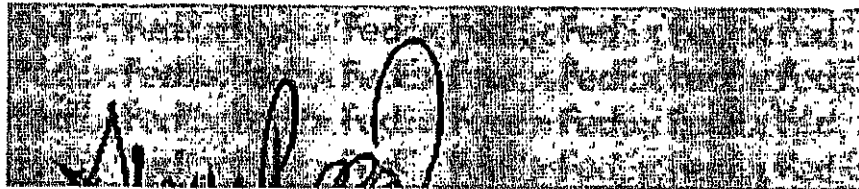


May 19, 2017

Dear Customer:

The following is the proof-of-delivery for tracking number 786603016157.

Delivery Information:			
Status:	Delivered	Delivered to:	Receptionist/Front Desk
Signed for by:	S.REED	Delivery location:	50 WEST WASHINGTON ST RM 601 Chicago, IL 60602
Service type:	FedEx Priority Overnight	Delivery date:	May 18, 2017 12:50
Special Handling:	Deliver Weekday Direct Signature Required		



Shipping Information:			
Tracking number:	786603016157	Ship date:	May 17, 2017
		Weight:	2.0 lbs/0.9 kg

Recipient:
Attn: Emma Burse-Mail Rm Mgr.
Cook County Court
50 West Washington St. Rm 601
Chicago, IL 60602 US

Shipper:
Gordon Watts
821 ALICIA RD
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

FedEx Tracking **** Actual ** OVERNIGHT delivery at 12:50 p.m.**

FedEx Ground is faster to more locations than UPS Ground.
Choose what and affordable.

Track a Shipment Help

Enter up to 30 FedEx tracking, FedEx tag or FedEx Office order numbers (one per line).

My Shipments

Track and save tracking results for your next visit to fedex.com

788603016157 Save tracking results

Print Help

Ship date: **Wed 5/17/2017** Actual delivery: **Thu 5/18/2017 12:50 pm**

LANE LAND, FL US **Delivered** Chicago, IL US

Signed for by: S. REED

more actions

Travel History Help Hide

Date/Time	Activity	Location
5/18/2017 - Thursday		
12:50 pm	Delivered	CHICAGO, IL
9:38 am	On FedEx vehicle for delivery	CHICAGO, IL
6:45 am	At local FedEx facility	CHICAGO, IL
4:08 am	At destination sort facility	CHICAGO, IL
2:51 am	Departed FedEx location	ATLANTA, GA
5/17/2017 - Wednesday		
7:59 pm	Left FedEx origin facility	LANE LAND, FL
4:37 pm	Picked up	LANE LAND, FL
3:26 pm	Picked up	LANE LAND, FL
2:35 pm	Tendered at FedEx Office	
	Shipment information sent to FedEx	

Select time zone:

Shipment Facts Hide

Tracking number	788603016157	Service	FedEx Priority Overnight
Weight	2 lbs / 0.91 kgs	Dimensions	13x11x1 in.
Signature services	Direct signature required	Delivered To	Receptionist/Front Desk
Total pieces	1	Total shipment weight	2 lbs / 0.91 kgs
Terms	Third Party	Packaging	Your Packaging
Special handling section	Deliver Weekday, Direct Signature Required	Standard transit	5/18/2017 by 10:30 am

Promise of OVERNIGHT delivery by 10:30 a.m.

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FedEx proof of delivery, documenting delivery at 12:50 pm (CST)	Exhibit-B
Case law citations to the "Terri Schiavo" (aka: the Florida 'feeding tube girl') case	Exhibit-C
Court ruling & docketing information in the recent "Gay Marriage" case, heard before the U.S. 11th Circuit FEDERAL Court of Appeals, in Atlanta, Georgia	Exhibit-D
FedEx package refused by Atty. Joseph Younes	Exhibit-E
E-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)	
E-2 (AOL email dated April 21, 2017 from FedEx showing Defendant, Younes, refused court service)	
E-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)	

courtesy copy and the Clerk's official copy to Emma J. Burse, Mail Room Manager (312-603-3117, EJBurse@CookCountyCourt.com), for her to deliver, since previously, Priority mail to the judge got delayed.]

* **City of Chicago, CORPORATION COUNSEL**, 30 N LASALLE 900, CHICAGO IL, 60602,
Phone: (312) 742-0200; (312) 744-7764, Attn: Greg Janes (312-744-9555) and Glenn Angel (312-744-4033)
G.Janes@CityOfChicago.org, Greg.Janes@cityofchicago.org, GAngel@CityOfChicago.org,
Glenn.Angel@CityOfChicago.org, Benna.Solomon@CityOfChicago.org, Edward.Siskel@CityOfChicago.org

* **Joseph Younes Law Offices** / <http://ChicagoAccidentAttorney.net> (312)635-5716, per website: 166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602; Phone: (312) 372-1122 ; Fax: (312) 372-1408. Email is (or was?) RoJoe69@yahoo.com per <http://www.ZoomInfo.com/p/JosephYounes/599467626> Note: Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see e.g., **EXHIBIT-E** in the instant filing], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr. Younes & other litigants), and send me a nominal bill for said service, but, I doubt anyone would question me on this. In fact, Younes will have to get his service copy from his attorney, Hugh Howard, who uses the same mailing address: **Younes' attorney Hugh Howard, c/o: Law Offices of Hugh D. Howard**, 166 W Washington St, Suite 600, Chicago, IL 60602, Phone | 312-781-1002, Email | Hugh@HughDHowardLaw.com, per: <http://www.HughDHowardLaw.com>

* **Heavner Beyers Mihlar LLC**, 111 E Main St #200, Decatur IL, 62523, (217) 422-1719, (312)-999-9110
[Mailing Address: P.O. Box 740, Decatur, IL 62525, per <http://www.HSBattys.com/page/about-us/>]
RickHeavner@hsbattys.com, JulieBeyers@hsbattys.com, FaiqMihlar@hsbattys.com,
MeredithPitts@hsbattys.com

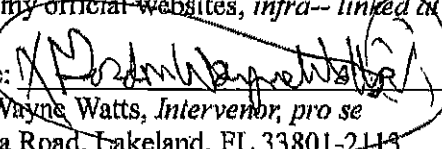
* **CR Realty Advisors, LLC**, which has been appointed by the court as a temporary receiver on the property: 325 W. Huron, **Suite 708**, Chicago, IL 60654, P: 312.332.7100, F: 312.332.7102, E: info@cr-ra.com, per: <http://www.cr-ra.com/contact/> —and— Attention: Josh Nadolna and David J. Mitidiero via: JoshN@cr-ra.com and DaveM@cr-ra.com

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "Notice of Motion," and its exhibits, were served upon all parties listed above, this 6th day of July, 2017 by the following methods:

- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford.

- E-mail: I may, later, serve all the parties listed above via email, in such cases as I have their e-mail address—as a courtesy. Or, then again, I may not (as it is not required), but if I serve any party electronically (via email), then I will serve all parties, so as to keep everybody in the loop.

- Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra-- linked at the "Mortgage Fraud" story, dated, Fri. 14 Apr. 2017.*

Signature: 

Date: X Thur. 06 July 2017

Gordon Wayne Watts, *Intervenor, pro se*

821 Alicia Road, Lakeland, FL 33801-2113

PH: (863) 688-9880 [home] or (863) 409-2109 [cell]

Web: www.GordonWatts.com / www.GordonWayneWatts.com

Email: Gww1210@aol.com / Gww1210@gmail.com

Date: Thursday, 06 July 2017

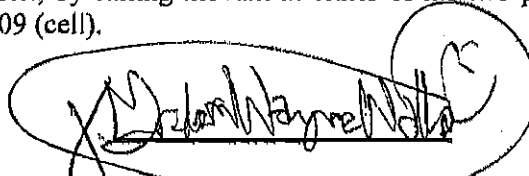
Looking at GMAC MORTGAGE LLC, et al. v. RICHARD DANIGGELIS, et al. (case number: 2007-CH-29738), which was heard before the **Chancery Division** of the Cook County, IL circuit court (not to be confused with a case heard in the **Law Division**, and by the same style and case number, which was subsequently transferred from Chancery to Law), we see a spirited fight put up for justice in this case, by no less than Mr. Watts, himself: As but one example of a motion considered without litigant appearing in person, we find from the docket in the above-mentioned case, on 11/30/2015, Watts moved for rehearing (*without* appearing in person), and on 12/07/2015, The Court (Hon. Michael F. Otto, associate judge, presiding in this case) ruled, in courtroom 2804, in a ruling titled: "MISCELLANEOUS MOTION – ALLOWED." While Judge Otto commits a tort of slander on page 3 of his Dec. 07, 2015 ruling¹, nonetheless, he does rule on the merits of Watts request to Supplement the Record on Appeal (in the appeal that was pending at that time).

Although the undersigned movant would argue that rulings made by Hon. Judge Michael F. Otto (Associate Judge, #2605) were exceptionally incorrect (as a matter of case law, statutory law, and State & Federal constitutional rights), as applied to the facts of that case, *nonetheless*, Judge Otto finally (after much prodding and begging) considered the motions on the merits—and issued a ruling (right or wrong), not just once, but several times. (Judge Otto should be commended for an "A+" performance of granting "Procedural Due Process," even if "Substantive Due Process" was trampled upon by what movant argues were "unjust" rulings.)

Therefore, even This Court's own legally-binding precedent confirms that State and Federal Due Process require all redresses, grievances, suits at law, and related motions to be heard on the merits—whether *or not* litigants seeking redress can physically travel to The Court *in propria persona*: ***The Court does not discriminate nor deny due process to litigants simply for being "too poor" to afford to hire a lawyer to appear—or to travel to appear themselves. Discrimination is wrong—in any of its forms or manifestations.***

Prayer for Relief: Therefore, please review and rule on my motion for intervention, filed by overnight FedEx on 05/17/2017 and docketed on 05/18/2017, according to This Court's docket. This Court may also (if it so chooses) invoke Art. II, Rule 185 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, and/or Rule 206(h)(Remote Electronic Means Depositions), etc., by calling movant at either of his two phone numbers of record: 863-688-9880 (home) and/or 863-409-2109 (cell).

Dated: This Thursday, July 06, 2017



CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)

The undersigned Movant, Gordon Wayne Watts, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "Notice of Motion," and its exhibits were delivered to the following parties as indicated – this Thursday, the 6th day of July 2017:

* **CIVIL DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 601, Ph: (312) 603-5116, (312) 603-5122, (312)603-5252, Chicago, IL 60602, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

* **Hon. Patrice Munzel Ball-Reed, Associate Judge, Civil Division, District 1 - Housing Section, Daley Center, 50 W. Washington St., Rm. 1105, Chicago, Illinois 60602, Ph: (312) 603-4535** The number listed on Judge's page, ends in '4536': <http://www.CookCountyCourt.org/JudgesPages/BallReedPatrice.aspx> but clerk says that this is wrong number & goes to room 1107. [Note: I'm attempting to send both Judge Ball-Reed's

¹ *Falsely claiming that Watts is arguing that vexatious litigants practices are 'OK'—direct quote: "The argument that all strangers to a case should be allowed to engage in the tactics of a vexatious litigant is so unpersuasive as to require no further discussion."—Watts ****never**** said such things within the "4 Corners" of any of his briefs, arguing only that if vexatious litigants be given a fair hearing, then he should be heard & treated fairly too.*

and Orlando, Fla.), and has neither a local attorney retained (to appear on his behalf), nor resources to glibly travel at the drop-of-a-hat whim to Chicago, Illinois (to appear for himself), due to oppressive and ever-present financial constraints.

Proposed Solution: This motion should be considered on its merits via written submission to This Court. *In the alternative*, This Court may also (if it so chooses) invoke Art. II, Rule 185 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, and/or Rule 206(h)(Remote Electronic Means Depositions), etc., by calling movant at either of his two phone numbers of record: 863-688-9880 (home) and/or 863-409-2109 (cell)

Arguments Whereof: It is very common legal precedent for motions to be considered in written form only. (In fact, this is probably the most common form, or at least a close second, if not first-place.) *Here are but a few examples:*

(1) Intervenor, Gordon Wayne Watts, filed direct intervention as “next friend” in the Florida Supreme Court on behalf of the late Theresa Marie “Terri” Schindler-Schiavo (see e.g., Exhibit-C). While the court eventually ruled against him in a razor-thin 4-3 split decision (garnering almost 43% of his panel), Mr. Watts' motions, nonetheless, were considered on the merits before the full Supreme Court of his home state, in this high-profile case, and, in fact, his intervention got even farther than that of former Florida Governor, John Ellis “Jeb” Bush, who filed similar intervention on behalf of Ms. Schiavo (Bush lost 7-0), or even Schiavo's blood family (who got only about 33% of their panel in Federal Court).

Watts lost 4-3 on rehearing. Bush lost 7-0 on rehearing – before the same panel, and on the same issue. (Apparently, the court liked Watts' “food/water” arguments better than the similar, but inferior “feeding tube” arguments presented by both Gov. Jeb Bush and Schiavo's parents.) Although Watts occasionally visited The Florida Supreme Court in person while he was a student at The Florida State University (in Tallahassee, Fla.), he never appeared in person to present his motions for intervention in the infamous “Terri Schiavo” case, and yet **The Court still considered the matter on the merits.** (See Exhibit-C)

(2) Subsequently, Mr. Watts decided to file an *Amicus Curiae* (a friend of the court brief) in one of the recent “Gay Marriage” cases pending before the Federal Appeals court in his circuit. In fact, he even went as far as to ask The Court for leave to amend 'out of time' (a rare procedure to allow a litigant to amend a brief, even though filing deadlines have passed, to correct errors and/or to add additional materiel, facts, arguments, etc.). It is believed that Watts was the only non-Lawyer litigant allowed participation in this case. (In fact, Watts was permitted to amend his initial brief, out of time, even though another *pro se* non-Lawyer was denied: Ex-D) In any event, although Mr. Watts did not present, “in person,” his motion for leave to file an *amicus* brief, nor the *amicus* brief itself, by traveling to The U.S. 11th Circuit FEDERAL Court of Appeals, in Atlanta, GA, nonetheless, the court considered his brief and all related motions on the merits. (See, e.g., Exhibit-D)

(3) Let us also consider the case of an imprisoned Illinois prisoner – in some state or county jail: many a “jailhouse lawyer” exists in our correctional institution's incarcerated population. They file all *kinds* of frivolous lawsuits, motions, and torts! While most of them end up in “file-13” of that great wastebasket of the Judicial System, nonetheless, state and federal Due Process requires these motions be considered on the merits. While the undersigned litigant has no “expert” knowledge of The State of Illinois court system, it goes without saying that not all prisoners are carted “back and forth” to the court for *numerous frivolous* motions (for very obvious cost-restraint reasons—in fact, Illinois is currently facing a financial crisis!). These prisoners, many of whom do not appear in person to present their motions, nonetheless, get “their day in court”: **They don't appear in person, and yet their motions are still considered on the merits!**

(4) Perhaps, the best argument for *consideration* of a motion, where the litigant can't travel to The Court in person to present it, comes from This Court itself! (And would, thus, be legally-binding case-law precedent.)

Here are the details of the work done, as shown in the Exhibits:

Where intervention as of right is asserted, "the trial court's jurisdiction is limited to determining [[#1]] timeliness, [[#2]] inadequacy of representation and [[#3]] sufficiency of interest; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted." *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984). [Enumeration and emphasis added in underline & bold; not in original] Petitioner satisfies all three requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3). [#1] This is timely; [#2] I doubt that anyone would doubt that the many new points Intervenor raises lack representation, as they are key facts that have not been addressed before, and this case could tip either way depending on my submitting (or not submitting) these key facts. However, is prong #3 satisfied?

Looking at the great financial costs Intervenor has incurred, we don't even count his own litigation (printing, service costs, and the huge time lost from working a better-paying job). But, looking solely at the FOIA and other misc. research Intervenor did for Daniggelis, and for which Daniggelis indicated he wished to pay, we see the following: \$104.68 + \$10.21 + \$21.19 + \$11.50 + \$33.19 + \$2.25 + \$13.28 + \$20.64 + \$9.60 + \$76.25 + \$6.47 + \$3.95 + \$8.88 + labour + time lost from work. This suggest that Intervenor has spent at least \$322.09, not counting huge time lost from work, gas & upkeep for his vehicle, food costs, etc. (And, were we to count the legal filings, and not just the research, estimating what a 'real' lawyer would charge to file supportive briefs – Intervenor is not a lawyer – this would drive up the costs to triple or more, since US Postal and FedEx service don't run on fairy dust.) Based on the foregoing, Intervenor has a huge interest. But – there is one more interest: Daniggelis is like a grandfather to him, and the pain he's suffered inflicts emotional harm upon Watts, in the same way were it to happen to anyone else's mother, father, uncle, grandfather, etc. Were Watts his biological kin, say, a son or daughter, Intervention solely based on emotional pain would not be questioned. #3: Lastly, Watts meets the third prong, sufficiency of interest, and should be permitted to intervene.

Of course, should the court decline to grant intervention as of right, Watts; filings might be deemed *amicus curiae*, with the good-will intentions to help the court. Indeed, *Kinkel v. Cingular Wireless, L.L.C.*, 223 Ill. 2D 1; 857 N.E.2d 250; 306 Ill.Dec. 157 (Jan. 11, 2006), holds that an *Amicus* needs merely offer helpful information that the parties have overlooked. Illinois Courts also adopt a 7th Cir. Federal Court standard in which((#1)) a party is not represented at all; ((#2)) the 'direct interest' test; or, ((#3)) the same test as above: Helpful info overlooked by the parties. NOTE: The 7th Circuit test uses the key operator "or," meaning that any one "or" the other of the three tests need apply. See e.g., *NOW, et al. v. Scheidler, et al.*, (Nos. 99-3076, 99-3336, 99-3891 & 99-3892, 7th. Cir., Opinion July 31, 2000. But, it would appear the *amici* are disfavoured in Illinois thru some unspoken rule, so maybe this alternative should be ignored, and Intervention granted.

CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "**Motion to Intervene by Intervenor, Gordon Wayne Watts,**" and its exhibits were delivered to the following parties as indicated – ~~this Wednesday, the 17th day of May 2017.~~

* **CIVIL DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 601, Ph: (312) 603-5116, (312) 603-5122, (312)603-5252, Chicago, IL 60602, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

* **Hon. Patrice Munzel Ball-Reed, Associate Judge, Civil Division, District 1 - Housing Section, Daley Center, 50 W. Washington St., Rm. 1105, Chicago, Illinois 60602, Ph: (312) 603-4535** The number listed on Judge's page, ends in '4536': <http://www.CookCountyCourt.org/JudgesPages/BallReedPatrice.aspx> but clerk says that this is wrong number and goes to room 1107. [Note: I'm attempting to send both Judge Ball-Reed's courtesy copy and the Clerk's official copy to Emma J. Burse, Mail Room Manager (312-603-3117, EJBurse@CookCountyCourt.com), for her to deliver, since last time, my Priority mail to the judge got delayed.]

* **City of Chicago, CORPORATION COUNSEL**, 30 N LASALLE 900, CHICAGO IL, 60602, Phone: (312) 742-0200; (312) 744-7764, Attn: Greg Janes (312-744-9555) and Glenn Angel (312-744-4033)
Gjanes@CityOfChicago.org, Greg.Janes@cityofchicago.org, GAngel@CityOfChicago.org,
Glenn.Angel@CityOfChicago.org, Benna.Solomon@CityOfChicago.org, Edward.Siskel@CityOfChicago.org

* **Joseph Younes Law Offices** / <http://ChicagoAccidentAttorney.net> (312)635-5716, per website: 166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602; Phone: (312) 372-1122 ; Fax: (312) 372-1408. Email is (or was?) RoJoe69@yahoo.com per <http://www.ZoomInfo.com/p/JosephYounes/599467626> Note: Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see e.g., **EXHIBIT-C** in the instant filing], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr. Younes & other litigants), and send me a nominal bill for said service, but, I doubt anyone would question me on this. In fact, Younes will have to get his service copy from his attorney, Hugh Howard, who uses the same mailing address: **Younes' attorney Hugh Howard, c/o: Law Offices of Hugh D. Howard**, 166 W Washington St, Suite 600, Chicago, IL 60602, Phone | 312-781-1002, Email | Hugh@HughDHowardLaw.com, per: <http://www.HughDHowardLaw.com>

* **Heavner Beyers Mihlar LLC**, 111 E Main St #200, Decatur IL, 62523, (217) 422-1719, (312)-999-9110 [Mailing Address: P.O. Box 740, Decatur, IL 62525, per <http://www.HSBattys.com/page/about-us/>] RickHeavner@hsbattys.com, JulieBeyers@hsbattys.com, FaiqMihlar@hsbattys.com, MeredithPitts@hsbattys.com

* **CR Realty Advisors, LLC**, which has been appointed by the court as a temporary receiver on the property: 325 W. Huron, Suite 230, Chicago, IL 60654, P: 312.332.7100, F: 312.332.7102, E: info@cr-ra.com, per: <http://www.cr-ra.com/contact/>

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "**Motion to Intervene by Intervenor, Gordon Wayne Watts,**" and its exhibits, were served upon all parties listed above, this ~~17th~~ 17th day of ~~May~~ May, 2017 by the following methods:

- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford.

- E-mail: I may, later, serve all the parties listed above via email, in such cases as I have their e-mail address—as a courtesy. Or, then again, I may not (as it is not required), but if I serve any party electronically (via email), then I will serve all parties, so as to keep everybody in the loop.

- Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra-- linked at the "Mortgage Fraud" story, dated. Fri. 14 Apr. 2017.*

Signature: _____ Date: _____

Gordon Wayne Watts, *Intervenor, or, in the alternative, Amicus Curiae**

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880

Web: www.GordonWatts.com / www.GordonWayneWatts.com

Email: Gww1210@aol.com / Gww1210@gmail.com

~~Date: Wednesday, 17 May 2017~~

* Watts, acting counsel of record, is not a lawyer. Per Local Rule 2.1, "Notice of Hearing of Motions," Watts, appearing *pro se*, is giving notice of his motion

INDEX TO THE EXHIBITS

Instrument

Docket/Tab#

DNAinfo news item (screenshot)

Exhibit-A

A-1 (news item title)

A-2 (section quoting Jordan Matyas, who *effectively* calls Younes a liar)

Work done for Daniggelis

Exhibit-B

FOIA research (Freedom of Information Act requests for public records—and other services)

B-1 (FOIA - 07/16/2015 grant of various Clerk of the Court, Cook Cty, IL, records)

B-2 (FOIA – 07/24/2015 bill of \$104.68 to CHANCERY Division, Cook Cty, IL, records)

B-3 (FOIA – 07/24/2015 bill of \$102.50, with date-stamp; Showing the \$104.68 before fees)

B-4 (FOIA – 07/31/2015 bill of \$10.00, before fees; Showing \$10.21 after transaction fee)

B-5 (FOIA – record: Credit Card statement, cover sheet, closing on 07/17/2015)

B-6 (FOIA – 07/16/2015, Credit Card bill for \$21.19 Cook County, IL court records)

B-7 (FOIA – 09/10/2015: \$11.50, Ship to Daniggelis via USPS)

B-8 (FOIA – 12/03/2015: bill of \$33.19 to LAW Division, Cook Cty, IL, records)

B-9 (FOIA – 01/13/2015: bill of \$2.25 to LAW Division, Cook Cty, IL, records)

B-10 (FOIA – 01/21/2015: bill of \$13.28 to CIVIL, 1st Municipal Division, Cook Cty, IL, records)

B-11 (AxiomBanking 05/17/2016 ship FOIA research via UPS to Daniggelis, \$20.64;

(AxiomBanking 05/26/2016 pay for FOIA research printouts to UPS to Daniggelis, \$9.60)

B-12 (FOIA 07/01/2016: FOIA Request from First Appellate Court, IL, acknowledging \$76.25 in fees)

B-13 (FOIA 07/01/2016: FOIA costs: \$76.25 money order; \$6.47 mailing; \$3.95 lunch break)

B-14 (FOIA replies of 06/03/2016 and 04/07/2017 from City of Chicago, Building Dept. Cost: TIME)

B-15 (FOIA reply of 06/07/2016 from City of Chicago, POLICE Department. Cost: TIME)

B-16 (FedEx shipping receipt to send FOIA research to Daniggelis: 09/15/2015, est. cost \$8.88 + labor)

B-17 (FOIA replies of May 18, May 25, June 1, June 8, 2016 from IL Office of Atty Gen; Cost: TIME)

B-18 (FOIA reply of 04/12/2017 from City of Chicago DPD e.g., Landmarks; Cost: TIME)

FedEx package refused by Atty. Joseph Younes

Exhibit-C

C-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)

C-2 (AOL email dated April 21, 2017 from FedEx showing Defendant, Younes, refused court service)

C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

Browser tabs: Gordon Wayne Wicks, Rotted historic Building In ...

Address bar: www.dnainfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seiz...

Navigation: dna info CHICAGO FOLLOW SUBSCRIBE

Category: LINCOLN PARK & OLD TOWN Politics Real Estate

'Rotted' Historic Building In Old Town Triangle Could Be Seized By City

By Ted Cox | March 30, 2017 5:00pm
 | Updated on March 30, 2017 10:43pm
 @tedcoxchicago



With the steeple of St. Michael's Roman Catholic Church in the ...

View Full Caption DNAinfo/Ted Cox

OLD TOWN TRIANGLE — The city has moved to seize control of a historic landmark district building that it says has been left to rot at 1720 N. Sedgwick Ave.

"We believe that this owner is allowing the building to deteriorate so he can obtain a demolition permit," said Ald. Michele Smith

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Recommended

PIZZA NORTH

A-2 (section quoting Jordan Matyas, who effectively calls Younes a liar)

Menu

www.dnainfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-1

matyas 2 of 2

dna info | CHICAGO ▾

According to Smith, Younes could never get agreements with the Buildings Department and the Landmarks Commission "because he seemed to be dragging his feet all the time."

"Now we have this guy we think is willingly letting it deteriorate," she added. "We're not going to let that happen."

Jordan **Matyas**, who represented the Old Town Triangle Association at Thursday's court hearing, said Younes was being disingenuous in saying he didn't intend to level the site. "He's told me twice that he always wanted to demolish it," **Matyas** said, and he told the judge that he intended to pursue a demolition permit as well. "So we have some mixed signals from the owner, but his actions speak clearly about his intent for the building."

Reminder: AOL will never ask you for your password or billing information.

Subject: copies file 07ch29733, 04ch10851, 10mr1701473
Date: 7/16/2015 12:30:29 PM Eastern Daylight Time
From: slevy@cookcountycourt.com
To: gww1210@aol.com
CC: gww1210@aol.com, cmeddington@cookcountycourt.com
Sent from the Internet (Details)

Hello Mr. Gordon,

Please see attachment,

Thank you,

Sharon Briggins - Levy
Manager Chancery Division
(312) 603-3287

=



Quick Search
Client ID

implment@cookcountycourt.com

Orders Fulfillment Cook Co District 1 - Chance.. (81020)

Your order has been updated.
Your order has been authorized.

Order: 50280881

Order Details Order Summary Comments

Line #	Product	Price	Reference #
1	Chancery Division Fees/Costs (8813)	102.60	2004gh1081

#	Type	Amount	Card/Acct	Last Name	First Name	Status
1	CC	104.68	MC 2738	Watte	Gordon	Authorized

Status: Order Open Payment Paid in Full

Source: POS

Fee Data:

Agency	102.60
Expedite	0.00
Misc	0.00
VitalChek	2.18
Shipping	0.00
Other	0.00
Total	104.68

[Print Receipt](#)

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Order Open Payment Paid in Full

Source: POS

Fee Data:

Agency	102.60
Expedite	0.00
Misc	0.00
VitalChek	2.18
Shipping	0.00
Other	0.00
Total	104.68

[Print Receipt](#)

THE HONORABLE DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
COOK COUNTY, IL

DATE: 7/24/2015 TIME: 4:16PM
IN: 0010-0001 RN: 00066575
DIST: 01 DIV: Chancery
CHNL-134 CASHIER: JESSICAP CRN: 529

ATTORNEY NO: 99500

REF CASE NO: 2004ch10851
REF OTHER: 2007CH

CASE TOTAL: \$102.50

Copy Fee	\$75.50
Record Searches	\$27.00
CREDIT CARD:	\$102.50
CHANGE	\$0.00

RECEIPT 0001 OF 0001
TRANSACTION TOTAL: \$102.50

THANK YOU

THE HONORABLE DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
COOK COUNTY, IL

DATE: 7/31/2015 TIME: 12:00PM
TN: 0003-0001 RN: 00066663
DIST: 01 DIV: Chancery
CHNL-134 CASHIER: JESSICAP CRN: 534

ATTORNEY NO: 99500
REF CASE NO: 2007ch29738
REF OTHER:

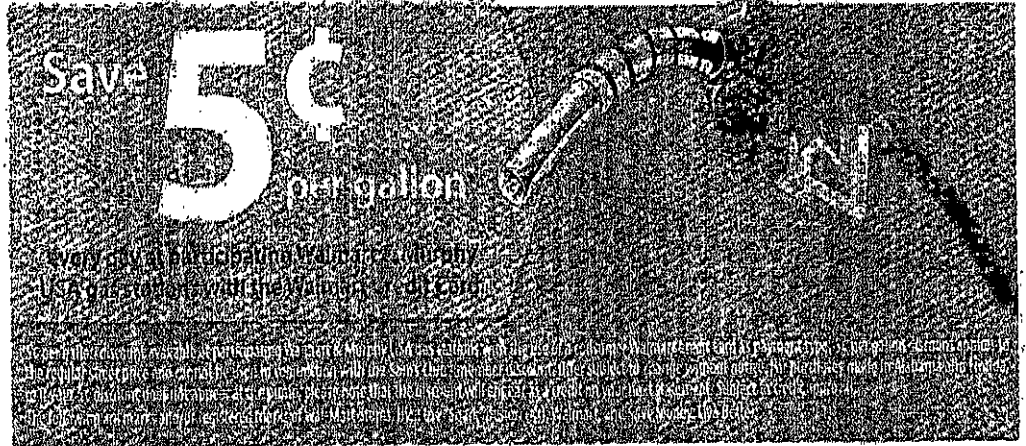
CASE TOTAL: \$10.00
Copy Fee \$10.00
CREDIT CARD: \$10.00
CHANGE \$0.00
RECEIPT 0001 OF 0001
TRANSACTION TOTAL: \$10.00

THANK YOU

Status	
Order	Open
Payment	Paid In Full
Source	POS
Fee Data	
Agency	10.00
Expedite	0.00
Misc	0.00
VitalChek	0.21
Shipping	0.00
Other	0.00
Total	10.21
Print Receipt	



Save more at the pump with your Walmart® Credit Card.



Walmart® MasterCard®

GORDON W WATTS
Account Number: xxxx-xxxx-xxxx-2738

Visit us at walmart.com/credit
Customer Service: 1-866-611-1148

07/17/2015

Summary of Account Activity	
Previous Balance	\$4,358.74
- Payments	\$984.24
+ Purchases/Debits	\$121.07
+ Interest Charges	\$73.81
New Balance	\$3,564.38
Credit Limit	\$10,000
Available Credit	\$6,435
Cash Advance/Quick Cash Limit	\$2,000
Available Cash	\$2,000
Statement Closing Date	07/17/2015
Days in Billing Cycle	30

Payment Information	
New Balance	\$3,564.38
Total Minimum Payment Due	\$110.00
Payment Due Date	08/10/2015

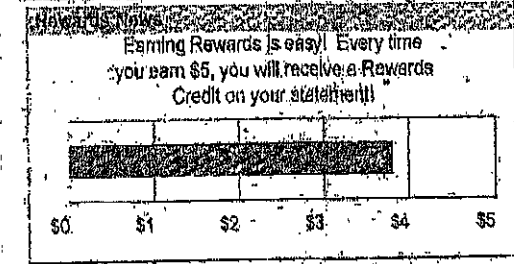
Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee up to \$35.00.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

Payment Method	Time to Pay Off	Total Interest Paid
Only the minimum payment	16 years	\$9,033.00
\$138.00	9 years	\$4,960.80 (Savings = \$4,072.20)

If you would like information about credit counseling services, call 1-877-302-8775.

Rewards Summary	
Previous Balance	\$2.80
(+) Earned This Period	\$1.20
= Balance	\$3.80

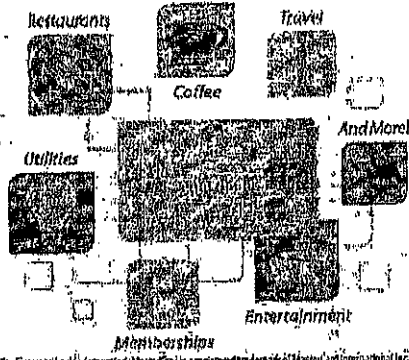


Gordon W. Watts
CREDIT CARD
STATEMENT



Use your card everywhere
MasterCard® is accepted to

Earn Rewards.



© 2015 Walmart MasterCard Rewards Program Terms & Conditions. The Walmart MasterCard Rewards Program is a service provided by MasterCard International Corporation. MasterCard is a registered trademark of MasterCard International Corporation. The following are marks and/or registered marks of Visa, MasterCard, American Express, Discover, and others.

Year	Post Date	Reference Number	Description of Transaction or Credit	Amount
06/26	06/26	65239145H00XTMJJH4	PYMNT IN STORE THANK YOU LAKELAND FL	(\$64.04)
06/26	06/26	65541065K03SNMYRL	INDC FOODMART QSS LAKELAND FL	\$1.06
06/30	06/30	65239145N00XTMJJH7	PYMNT IN STORE THANK YOU BARTOW FL	(\$17.95)
06/30	06/30	65239145N00XTMJJK0	PYMNT IN STORE THANK YOU BARTOW FL	(\$900.00)
07/03	07/03	65239145S00XTMJJH3	PYMNT IN STORE THANK YOU PLANT CITY FL	(\$87.85)
07/07	07/07	66410185VMJAGNAG6	FEDEX 4991241 MEMPHIS TN	\$32.37
07/08	07/08	65429065XRL6DRJG5	EBAY INC 08062068300 CA	(\$17.09)
07/08	07/08	65239145Y09XTMJJH7	PYMNT IN STORE THANK YOU LAKELAND FL	(\$64.56)
07/14	07/14	66410185VMJAGNAG6	FEDEX 4991241 MEMPHIS TN	\$28.37
07/14	07/14	65239145400XTMJJH1	PYMNT IN STORE THANK YOU LAKELAND FL	(\$160.05)
07/16	07/16	054986456004FR01	COOK CO FIRST MUNICIPAL CHICAGO IL	\$21.19
FEES				
TOTAL FEES FOR THIS PERIOD				\$0.00
INTEREST CHARGED				
INTEREST CHARGE ON PURCHASES				\$73.81
INTEREST CHARGE ON CASH ADVANCES				\$0.00
TOTAL INTEREST FOR THIS PERIOD				\$73.81

07/16 2015

June 2015 Invoice

Total Fees Charged in 2015	\$0.00
Total Interest Charged in 2015	\$491.51
Total Interest Paid in 2015	\$327.70

Type of Balance	Expiration Date	Annual Percentage Rate	Balance Subject To Interest Rate	Interest Charge
Regular Purchases	N/A	22.90%	\$3,821.28	\$73.81
Cash Advances	N/A	25.90%	\$0.00	\$0.00

Important Notices and Information:
Your Annual Percentage Rate (APR) is the annual interest rate on your account.
Eligible card purchases may be billed under one of the following promotions: no interest if paid in full within 8, 12, 18 or 24 months. Under each of these promotions, if the promotional balance is not paid in full within the promotional period, interest will be imposed from the date of purchase at a rate of 22.90%. If a (c) is shown after your APR in the Interest Charge Calculation section of this billing statement, the APR is a variable rate and will vary with the market as set on the Finance Rate. Minimum monthly payments are required. See promotional governing for further details.
If your account has a deferred interest promotion and you would like us to apply a payment on your account to a specific balance, please call Customer Service to discuss options that may be available.

Strategy
Gout
De Adams

#139
Boy
Montgomery TX
26.3-16
Hedley

Boy
#137
Jim Wicket
Montgomery AL
Hedley
Syracuse TX

PUBLIC RECORDS
for
Rick Danigga

\$21.19
Richard B Danigga Public Record Request
for file in 3 case of identical signature
in 2 warranty books showing forgo, etc



Get up to \$100 Quick Cash*

at the register with the Walmart® Credit Card.

No ATM Fees

Just select the amount you need in \$20 increments using the debit reader when you're checking out.

Statement

09-17-2015



Arrival Charge
Cherry, Sin, Low, Court
STATE + Appeal
MORTGAGE & Envelope
+ Seal
Tape

*Get up to \$100 quick cash in 5-20 minutes when you make a purchase with your Walmart Credit Card at Walmart-owned registers in Walmart stores. Merchants charge the. This cash advance will depend on your credit history and on success of the 1-2-3-Go! activation. See Walmart.com for approval.
The Walmart MoneyCard is issued by Signature Bank pursuant to a license by MasterCard International Incorporated. MasterCard is a registered trademark of MasterCard International Incorporated.
The following are marks and/or registered marks of Visa, Inc., Visa Signature, the "Chip" design (TM), Walmart and Ship Your Way (SM) are trademarks.

Transaction Summary	Type	Post Date	Reference Number	Description of Transaction or Credit	Amount
	08/18	08/18	054101977MJJ7H7NRE	FEDEX 402824334 MEMPHIS TN	\$88.04
	08/24	08/24	054101977MJJ7H7NRE	FEDEX 402912898 MEMPHIS TN	\$169.95
	08/24	08/24	05239147700XTMJH4	PYMNT IN STORE THANK YOU LAKELAND FL	(\$207.66)
	08/26	08/26	054101977MJJ7H7NRE	FEDEX 403854906 MEMPHIS TN	68.99
	08/28	08/28	054101977MJJ7H7NRE	FEDEX 404211201 MEMPHIS TN	\$53.05
	08/28	08/28	554295077RRL728HJQ	BBAY INC. 08862868900 GA	\$37.05
	08/28	08/28	054101977MJJ7H7NRE	FEDEX OFFICE 00008808 LAKELAND FL	\$368.24
	08/30	08/30	054101977MJJ7H7NRE	USPS 11452208939710730 LAKELAND FL	\$11.60
	08/30	08/30	054101977MJJ7H7NRE	FEDEX OFFICE 00008808 LAKELAND FL	\$387.77
	08/30	08/30	054101977MJJ7H7NRE	FEDEX OFFICE 00008808 LAKELAND FL	\$4.25
	08/30	08/30	054101977MJJ7H7NRE	FEDEX OFFICE 00008808 LAKELAND FL	\$4.69
	08/30	08/30	05239147700XTMJH4	PYMNT IN STORE THANK YOU LAKELAND FL	(\$82.71)
	08/30	08/30	054101977MJJ7H7NRE	FEDEX 404800235 MEMPHIS TN	\$131.70
	08/31	08/31	5523914800ATRL2RD	WALMART 000776 LAKELAND FL	\$36.34
	08/31	08/31	5523914800XTMJH7	PYMNT IN STORE THANK YOU LAKELAND FL	(\$49.19)
	08/31	08/31	054101977MJJ7H7NRE	FEDEX 404780701 MEMPHIS TN	\$19.95
	08/31	08/31	054101977MJJ7H7NRE	FEDEX OFFICE 00008808 LAKELAND FL	\$2.80
	08/31	08/31	054101977MJJ7H7NRE	FEDEX OFFICE 00008808 LAKELAND FL	\$2.24
	08/31	08/31	554295077RRL728HJQ	FEDEX OFFICE 00008808 LAKELAND FL	\$24.19
	08/31	08/31	554295077RRL728HJQ	FEDEX OFFICE 00008808 LAKELAND FL	\$15.00
	08/31	08/31	0523914800XTMJH7	PYMNT IN STORE THANK YOU LAKELAND FL	(\$20.01)
	08/31	08/31	0523914800XTMJH7	REWARDS/SPECIAL CATER CREDIT	(\$10.00)
	08/31	08/31		FEES	
	08/31	08/31		TOTAL FEES FOR THIS PERIOD	\$0.00
	08/31	08/31		INTEREST CHARGED	
	08/31	08/31		INTEREST CHARGE ON PURCHASES	\$98.60
	08/31	08/31		INTEREST CHARGE ON CASH ADVANCES	\$0.00
	08/31	08/31		TOTAL INTEREST FOR THIS PERIOD	\$98.60

2015 Total Fees and Interest	
Total Fees Charged in 2015	\$0.00
Total Interest Charged in 2015	\$574.87
Total Interest Paid in 2015	\$478.84

Type of Balance	Expiration Date	Annual Percentage Rate	Balance Subject To Interest Rate	Interest Charge
Regular Purchases	NA	22.90%	\$5,091.35	\$95.83
Cash Advances	NA	25.90%	\$0.00	\$0.00

Eligible card purchases may be billed under one of the following promotional rates: No interest if paid in full within 6, 12, 18 or 24 months. Under each of these promotional rates, if the promotional balance is not paid in full within the promotional period, interest will be assessed from the date of purchase at a rate of 22.90%. If a (V) is shown after your APR in the Interest Charge Calculation section of this bill/statement, the APR is a variable rate and will vary with the market based on the Prime Rate. Minimum monthly payments are required. See promotional advertising for further details.

If your account has a deferred interest promotion and you would like to apply a payment on your account to a specific balance, please call Customer Service to discuss options that may be available.

09/10/2015

19.56

131.78
S/A
FedEx Export
To Total Card
&
Appeal Card
Mail Forward
Danigelis

\$11.50
Ship to Danigelis

Walmart: Multimeter
Duct Tape, Seal Tape

8.99
Danigelis
33.73 Danigelis
19.32 Danigelis
+ 53.05

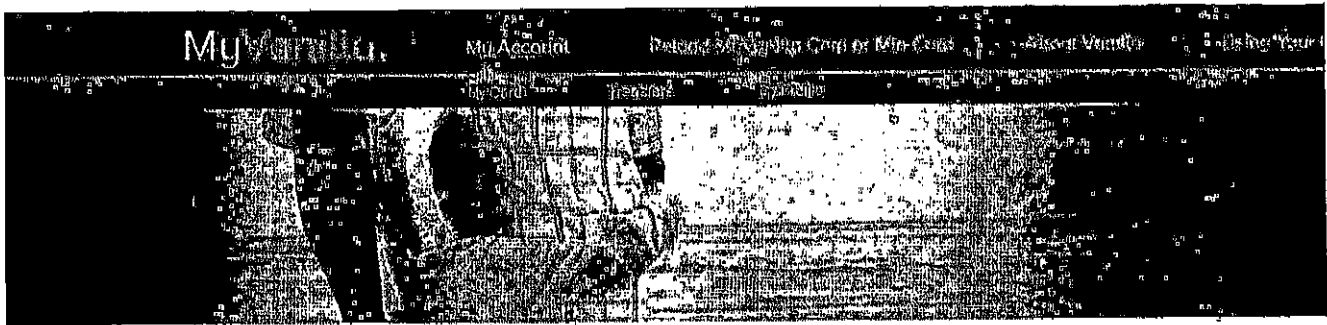
Point II - Danigelis
Card

Fax - Danigelis
Fax

To 1st Appeal
Court

506 x 0.096 / 100
= 55.30
+ 3.87
TAX

8.99



Card Activity

card number: 00002745 expiration date: 05/19 card status: 2

- Account
- Card activity
- Statements
- Report list or table card
- Activate a card
- Request a replacement card

Available Balance \$55.57

Pending Transactions 2 transactions

PRINT

Gordon's ledger:

- \$6.76 pd to OVB
- \$3.95 activation fee = \$91.75
- 2.99 M.D.
- 0.50 Transaction Fee = \$89.26
- \$2.50 Law Division Public Records
- 0.50 Tax fee
- 0.69 convenience fee
- \$55.57 Balance

- Find
- How to reload
- Reload card at: www.mcdonalds.com
- Download Direct Deposit form

DATE	TRANSACTION	DEBT	CREDIT
12/03/2015	MCDONALD'S FOOD LAKELAND, IL Reference: 0400013101A7 Description: PREAUTH TRANSACTION	\$2.99	
12/03/2015	LN COOK CO LAW DIV, CHICAGO, IL Reference: 0600013849FE Description: PREAUTH TRANSACTION		\$33.19

Reference number the operator gave me: 53261672
\$32.50 + 0.69 convenience fee = \$33.19

Date and Time Properties

Date & Time: Info Zone: Default Time

Date: December 2015

1	2	3	4	5
6	7	8	9	10
11	12	13	14	15
16	17	18	19	20
21	22	23	24	25
26	27	28	29	30
31				

Current month transaction history 1 transactions

ZOOM view:

12/03/2015 MCDONALD'S FOOD LAKELAND, IL \$2.99
Reference: 0400013101A7
Description: PREAUTH TRANSACTION

12/03/2015 LN COOK CO LAW DIV, CHICAGO, IL -\$33.19
Reference: 0600013849FE
Description: PREAUTH TRANSACTION

Reference number the operator gave me: 53261672
\$32.50 + 0.69 convenience fee = \$33.19

Date and Time Properties

Date & Time: Info Zone: Internet

Date: December 2015

1	2	3	4	5
---	---	---	---	---

AXIOM BANK

axiombanking.com • (800)584-0016

Jan 13:

004481
 GORDON WAYNE WATTS
 821 ALICIA RD
 LAKE LAND FL 33801-2113

SUMMARY OF YOUR ACTIVITY

STATEMENT DATE	JAN 15 16
STATEMENT NUMBER	2100653548
BEGINNING BALANCE	123.91
DEPOSIT AMOUNT	+ 377.68
WITHDRAWAL AMOUNT	- 346.89
SERVICE CHARGE	- .00
ENDING BALANCE	= 154.70

\$2.25
 Cook County IL (COURTS)
 LAW DIVISION Public Records Request

ACTIVITY	DATE	DESCRIPTION	WITHDRAWALS	DEPOSITS	BALANCE SUMMARY
AXIOM CHECKING	2100653548				
ACTIVITY BEGINNING	DEC 16 15				\$ 123.91
DEC 26	DEPOSIT LAKE LAND			200.00	\$ 323.91
DEC 26	RADIO SHACK CORP POS	PLANT CITY FL US 442987	41.84		\$ 282.07
DEC 28	THE HOME DEPOT 2 POS	LAKE LAND FL US 130402	79.60		\$ 202.47
DEC 28	THE HOME DEPOT 2 POS	LAKE LAND FL US 171594	54.24		\$ 148.23
DEC 29	AMAZON DIGG89922 Misc. Paym	CCD 68897857D		.68	\$ 148.91
DEC 30	Clearpoint Finan BILL PYMNT PPD		120.00		\$ 28.91
JAN 02	WM SUPERCENTER #547-KEYS POS	PLANT CITY FL US 000005	18.00		\$ 9.86
JAN 11	DEPOSIT LAKE LAND			111.00	\$ 120.86
JAN 13	DEPOSIT LAKE LAND			66.00	\$ 186.86
JAN 13	LN*COOK*O*LAND*IV*LA* POS	LAKE LAND FL US 000005	2.25		\$ 184.61
JAN 14	OREILLY AUTO PARTS POS	LAKE LAND FL US 069245	29.91		\$ 154.70

THE AVERAGE BALANCE FOR 2100653548 IN THIS STATEMENT PERIOD WAS **110.48**

SUMMARY OF YOUR DEPOSIT ACCOUNTS

ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
AXIOM CHECKING	2100653548	\$ 154.70	
TOTAL OF YOUR DEPOSIT ACCOUNTS		\$ 154.70	

19-05 = 5 rts of
 Copies of form for
 Miami PC house -
 front Door - Lock + Deadbolt

110.48 payment
 + 9.52 Ppp
 = 120.00

AXIOM BANK

axiombanking.com • (800)584-0015

004271
 GORDON WAYNE WATTS
 821 ALICIA RD
 LAKELAND FL 33801-2113

SUMMARY OF YOUR ACTIVITY

STATEMENT DATE	FEB 15 18
STATEMENT NUMBER	2100653548
BEGINNING BALANCE	154.70
DEPOSIT AMOUNT	+ 261.82
WITHDRAWAL AMOUNT	- 413.39
SERVICE CHARGE	- .00
ENDING BALANCE	3.23

AXIOM CHECKING	2100653548	WITHDRAWALS	DEPOSITS	BALANCE SUMMARY
ACTIVITY BEGINNING	JAN 16 18			\$ 154.70
JAN 21 COOK GO FIRST, MUNICIPA	POS	13.28		\$ 141.42
CHICAGO IL US 000000	*****8464 99999999			
JAN 26 DEPOSIT LAKELAND			260.00	\$ 401.42
JAN 29 AMAZON ACH/GRED IAT			1.82	\$ 403.34
FEB 01 Clearpoint Finan BILL PYMNT PPD		120.00		\$ 283.34
FEB 06 FEDEXOFFICE 00008508 POS	LAKELAND FL US 000096	275.42		\$ 7.92
*****8464 03P				
FEB 09 FEDEXOFFICE 00008508 POS	LAKELAND FL US 000002	4.69		\$ 3.23
*****8464 04P				
THE AVERAGE BALANCE FOR 2100653548 IN THIS STATEMENT PERIOD WAS \$				190.61

SUMMARY OF YOUR DEPOSIT ACCOUNTS

ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
AXIOM CHECKING	2100653548	\$ 3.23	
TOTAL OF YOUR DEPOSIT ACCOUNTS		\$ 3.23	

Banking and More

PUBLIC RECORDS REQUEST

Point of Sale Transaction
 Cook County, IL Courts
 Reports Request
 \$13.28
 Cook County, IL Courts

Looks OK:
 My own notes, in my own handwriting, mention this \$275.42 FedEx transaction

B-11 (AxiomBanking 05/17/2016 ship FOIA research via UPS to Daniggelis, \$20.64;
 (AxiomBanking 05/26/2016 pay for FOIA research printouts to UPS to Daniggelis, \$9.60)

AXIOM BANK

axiombanking.com • (800)584-0015

003782
 GORDON WAYNE WATTS
 821 ALICIA RD
 LAKELAND FL 33801-2113

SUMMARY OF YOUR ACTIVITY
 STATEMENT DATE JUN 15 16
 STATEMENT NUMBER 2100653548
 BEGINNING BALANCE .30
 DEPOSIT AMOUNT + 187.17
 WITHDRAWAL AMOUNT - 150.24
 SERVICE CHARGE - .00
 ENDING BALANCE 37.23

AXIOM CHECKING	2100653548	WITHDRAWALS	DEPOSITS	BALANCE SUMMARY
ACTIVITY BEGINNING	MAY 14 16			\$.30
MAY 14 3501 FLORIDA AVE	ATM		90.00	\$ 90.30
LAKELAND FL US 001542				
*****8464 CP302977*				
MAY 17 THE UPS STORE 2872	POS	20.64		\$ 69.66
CHICAGO IL US 000008				
*****8464 88999999				
MAY 18 DEPOSIT LAKELAND			88.00	\$ 164.66
MAY 26 THE UPS STORE 1053	POS	9.60		\$ 155.06
CHICAGO IL US 000000				
*****8464 88999999				
MAY 31 AMAZON DIG738767 Misc. Paym 160521			2.17	\$ 157.23
CDC 76148970D				
MAY 31 Clearpoint Finan BILL PYMNT PPD		120.00		\$ 37.23
THE AVERAGE BALANCE FOR 2100653548 IN THIS STATEMENT PERIOD WAS \$				86.33

SUMMARY OF YOUR DEPOSIT ACCOUNTS

ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
AXIOM CHECKING	2100653548	\$ 37.23	
TOTAL OF YOUR DEPOSIT ACCOUNTS		\$ 37.23	

Printout for
 Rich Daniggelis
 Mortgage Front Docs

POS =
 "POINT OF
 Sale
 Transaction"

Ship some research of records to Rich Daniggelis
 UPS Store # 2872 (Chicago, IL) \$20.64
 Pay for Printouts of more RECORDS research
 UPS Store #1053 (Chicago, IL) \$9.60

USPS - 7015-1730-0001 - 2318-4603

9594 9463-0734-5196123868

From the Desk of: Gordon Wayne Watts
821 Alicia Road - Lakeland, FL 33801-2113
H: (863) 688-9880 - C: (863) 409-2109 - W: (863) 686-3411 or (863) 687-6141
Email: Gwy1210@aol.com / Gwy1210@gmail.com
Web: www.GordonWatts.com / www.GordonWayneWatts.com

Hon. Tina M. Schillaci, Esq., Law Clerk / Staff Appellate Attorney, (312) 793-6199
470 1st District Appellate Court, Clerk's Office
160 North LaSalle St., Chicago, IL 60601-3130
(312) 793-5484, Office Hours: 8:30am - 4:30pm (CST)

How Copy

Re: GMAC Mortgage, LLC v. Richard B. Dantregalis, et al.
Case No: 1-14-2751
Atty. Joseph Youngs, Esq. v. Richard B. Dantregalis, et al.
Case No: 1-15-0662

Friday, 01 July 2016

Mon Bank
Pd by Mon Bank
41742051

Dear Attorney Schillaci:

WATTS
2016 65 3548

07/01/2016
Act 2 2817 5000
7625

Thank you for speaking with me last Friday morning (Fri. 24 June 2016) and this past Tuesday evening (Tue. 28 June 2016), and giving me the proper protocol and procedures for making a records request of court filings in your court. With regard to the two court cases cited above, I am sorry that I am somewhat slow to respond, but I have been busy with many things recently.

According to my recollection and notes, it would appear that you told me that the entire file in 1-14-2751 contained 172 pages, which at \$0.25/page, would cost me \$43.00 even, and that 1-15-0662 contained 133 pages, which would cost me \$33.25, for a sum total of \$76.25, and that your court only accepted payment by cash, check, or money order payable to "Clerk of the Appellate Court" (but had not yet set up payment by credit card or bank account electronic draft), and, also, that your court did not prefer to deal in cash for obvious reasons of security and documentation of the currency. You also said that if I were short, you could not advance credit, and would require payment in advance. Moreover, my notes reflect that if the opposite was the case (overpayment), you warned and cautioned me that your court could not issue any refund of excess payment, not even were I to include cash currency as part of all of the payment method, as your court's policy also prohibited sending cash by mail as well.

Because of that, I must get the payment amount "exact" or else risk over-payment (with no avenue or means for giving me change back for overpayment) or under-payment (where I can't get all the records I seek). For that reason, I made a call to your court to ascertain & determine whether any new filings or court orders had been entered into the record on appeal in either of the 2 above-captioned cases. After several unsuccessful tries (one time, a clerk said a motion was due on a certain date, but never answered my question about one case, and then hung up before I could inquire about the other case - meaning, she never answered me at all!), I finally determined that nothing new had been entered in either of these 2 cases since we spoke last week.

I wish you the best in getting your court set up for electronic payment (of "records request" fees) by Credit Card; electronic release of records (by email in PDF or image format in email attachments, like the trial courts currently do); and online dockets (preferably with click-to-see or scan image of the docket entry, but at least a docket of the entries, like the trial courts currently provide the public).

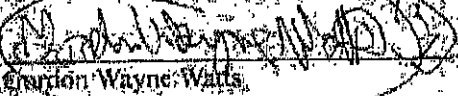
Please find enclosed a money order for \$76.25 for the file in both cases.

Bank Act
2016 65 3548

7015-1730-0001 -

2318-4603

With kind regards, I am, Sincerely,


Gordon Wayne Watts

Mon Bank
Act 2 2817 5000
Mon Bank # 41742051
07-01-2016 2 2817 5000

Returnless

9594 9463-0734-5196123868

B-13 (FOIA 07/01/2016: FOIA costs: \$76.25 money order; \$6.47 mailing; \$3.95 lunch break)

(Gordon Watts/NO)

Money Order
MONEY ORDER

07/01/2016

Friday

*\$ 76.25

Gordon Watts

41742051

CUSTOMER COPY

Purchaser Name	MO No.	Date	Check Amount
Gordon Watts	41742051	07/01/2016	\$76.25
MO No.	Account Number	Transaction Description	
1-15-2015 & 1-15-2016	28175000		

Cash Receipt

Bank AA # 2001653548

28175000

CASH (not from bank account)

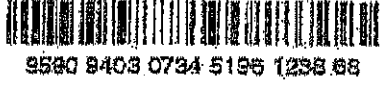
NON-NEGOTIABLE

REGISTERED MAIL

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to: *Attn: Juan ChzBgr*
Schiffman Bldg.
 1/2 1st District Appellate Court
 CLERK'S OFFICE
 360 North LaSalle Street
 Chicago, IL 60601-3130



9500 9403 0734 5195 1238 68

2. Article Number (Transfer from mailpiece label)
15 1730 0001 2318 4603

PS Form 3811, April 2015 PSN 7505-02-000-6063

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]* Agent Addressee

B. Received by (Printed Name) Date of Delivery

D. Is delivery address different from form 1? Yes No
 If YES, enter delivery address below:

3. Service Type
- Adult Signature
 - Adult Signature Registered Delivery
 - Certified Mail
 - Certified Mail Restricted Delivery
 - Collection Delivery
 - Collection Delivery Restricted Delivery
 - Insured Mail
 - Insured Mail Restricted Delivery (over \$500)
 - Priority Mail Express
 - Registered Mail
 - Registered Mail Restricted Delivery
 - Return Receipt for Merchandise
 - Signature Confirmation
 - Signature Confirmation Restricted Delivery

Kitche

Juan ChzBgr
WU103
Check: 10040

07/01/2016 1:13 PM

Domestic Return Receipt

#1065 363-603-9224

- 1 Attn Juan ChzBgr
- 1 Banknote - SH

Total: \$3.95

Web Tracking

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 Certified Mail Only

CHICAGO, IL 60601

Postage \$3.20

Insurance \$2.70

Postage and Insurance \$5.90

Postage \$0.47

Postage and Insurance \$6.47

Attn: Juan ChzBgr
 1/2 1st District Appellate Court
 360 North LaSalle Street
 Chicago, IL 60601-3130

07/01/2016

5096 PREC 1000 DEPT 5102

100 - SEE REVERSE FOR DETAILS. THE SUBMITTER WILL RECEIVE THE ORIGINAL MAIL AND RECEIPT. THE SUBMITTER WILL RECEIVE THE ORIGINAL MAIL AND RECEIPT.

B-14 (FOIA replies of 06/03/2016 and 04/07/2017 from City of Chicago, Building Dept. Cost: TIME)

5/16/2017

Re: *Public Records request: BUILDING Dept - City of Chicago*

From: DOBFOIA <DOBFOIA@cityofchicago.org>

To: Gww1210 <Gww1210@aol.com>

Subject: Re: *Public Records request: BUILDING Dept - City of Chicago*

Date: Fri, Jun 3, 2016 9:41 am

Attachments: 1720_N_Sedgwick.pdf (266K)

Mr. Watts:

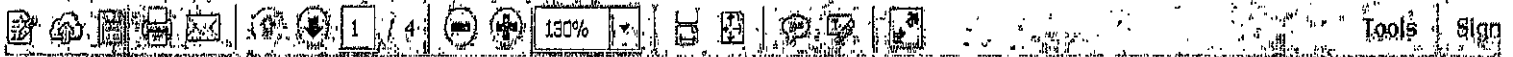
The records you requested are attached.

Sincerely,

C. Lynch
City of Chicago, Dept. of Buildings

ingDept-FOIA-more-RECORDS_PDF.pdf, Adobe Reader

w Window Help



5/16/2017

Re: *Public Records request: BUILDING Dept - City of Chicago*

From: DOBFOIA <DOBFOIA@cityofchicago.org>

To: gww1210 <gww1210@aol.com>

Subject: Re: *Public Records request: BUILDING Dept - City of Chicago*

Date: Fri, Apr 7, 2017 4:59 pm

Attachments: 1720_N_Sedgwick1.pdf (17K), 1720_N_Sedgwick.pdf (17K)

Mr. Watts:

Regarding your question as to whether there were any photos taken of the Stop Work Orders for 1720 N. Sedgwick, I have attached the latest records I have for this address.

Sincerely,

C. Lynch
City of Chicago, Dept. of Buildings

From: gww1210@aol.com <gww1210@aol.com>

Sent: Friday, March 31, 2017 12:44:59 PM

To: DOBFOIA; DOB-info

Cc: DOBFOIA; Lynch, Chris; Porche, Rodney; gww1210@aol.com; gww1210@gmail.com

Subject: Re: *Public Records request: BUILDING Dept - City of Chicago*

Chris, this is Gordon again.

I hate to bother you, but these criminals that have been trying to destroy the house at 1720 North Sedgwick Street, Old Towne, Chicago, IL (and resultantly make you all very busy, when y'all have to repeatedly put up "Stop Work Order" signs to put a stop to the illegal construction, demolition, & destruction of property), and I feel the need to do more news coverage.

B-15 (FOIA reply of 06/07/2016 from City of Chicago, POLICE Department. Cost: TIME)

5/18/2017

FW: Scanned from a Xerox multifunction device

From: FOIA <foia@chicagopolice.org>

To: Gww1210 <Gww1210@aol.com>

Subject: FW: Scanned from a Xerox multifunction device

Date: Tue, Jun 7, 2016 6:00 pm

Attachments: Scanned from a Xerox multifunction device001.PDF (2172K)

Good Afternoon,

Attached to this email is a response to your FOIA request.

Regards,

FOIA Section

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering that message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this document is strictly prohibited.

From: xerox@chicagopolice.org [xerox@chicagopolice.org]

Sent: Tuesday, June 07, 2016 5:56 PM

To: FOIA

Subject: Scanned from a Xerox multifunction device

Please open the attached document. It was scanned and sent to you using a Xerox multifunction device.

Attachment File Type: PDF

mulfifunction device Location: machine location not set

Device Name: HQ-X414NE-1

For more information on Xerox products and solutions, please visit <http://www.xerox.com>

B-16 (FedEx shipping receipt to send FOIA research to Daniggetis: 09/15/2015, est. cost \$8.88 + labor)



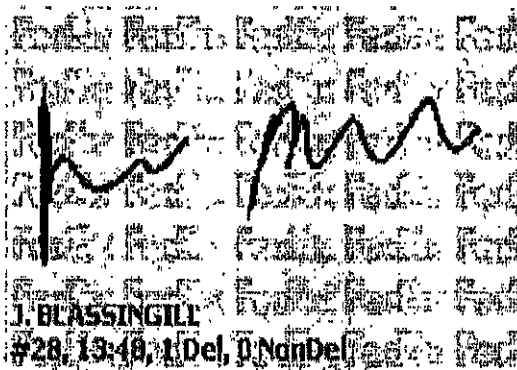
September 18, 2015

Dear Customer:

The following is the proof-of-delivery for tracking number 781311007128.

Delivery Information:

Status:	Delivered	Delivery location:	333 W NORTH AVE Chicago, IL 60610
Signed for by:	JBLASSINGILL	Delivery date:	Sep 15, 2015 13:51
Service type:	FedEx Ground		
Special Handling:			



Shipping Information:

Tracking number:	781311007128	Ship date:	Sep 10, 2015
		Weight:	1.6 lbs/0.7 kg

Recipient:
Richard B Daniggetis
c/o The UPS Store
333 W North Ave
Chicago, IL 60610 US

Shipper:
Gordon Watts
Gordon Watts
821 ALICIA RD
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

B-17 (FOIA replies of May 18, May 25, June 1, June 8, 2016 from IL Office of Atty Gen; Cost: TIME)

5/18/2017

Freedom of Information Act Request 2016 FOIA 41830

From: FOIAofficer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Poesley, Maura <MPoesley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

Date: Wed, May 18, 2016 12:45 pm

Attachments: 41830 Partial Closing and Extension Letter.pdf (71K)

Dear Mr. Watts:

Attached please find a letter pertaining to your recent FOIA request.

Very truly yours,

Caitlin Q. Knutte

FOIA Officer

Assistant Attorney General

Office of the Illinois Attorney General

E-MAIL CONFIDENTIALITY NOTICE: This electronic mail message, including any attachments, is for the intended recipient(s) only. This e-mail and any attachments might contain information that is confidential, legally privileged or otherwise protected or exempt from disclosure under applicable law. If you are not a named recipient, or if you are named but believe that you received this e-mail in error, please notify the sender immediately by return e-mail and promptly delete this e-mail and any attachments and copies thereof from your system. If you are not the intended recipient, please be aware that any copying, distribution, dissemination, disclosure or other use of this e-mail and any attachments is unauthorized and prohibited. Your receipt of this message is not intended to waive any applicable privilege or claim of confidentiality, and any prohibited or unauthorized disclosure is not binding on the sender or the Office of the Illinois Attorney General. Thank you for your cooperation.

From: FOIAofficer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Poesley, Maura <MPoesley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Date: Wed, May 25, 2016 4:21 pm

Attachments: 41830 RM- Paul Shelton.pdf (1881K), 41830 Confirm 5.19.16 Convo, Partial Closing and Extension Letter.pdf (134K)

Dear Mr. Watts:

Attached please find a letter and records pertaining to your recent FOIA request.

Very truly yours,

Caitlin Q. Knutte
FOIA Officer

From: FOIAofficer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Poesley, Maura <MPoesley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

Date: Wed, Jun 1, 2016 1:13 pm

Attachments: 41830 RM- Gordon Watts 2016 (1).pdf (5295K), 41830 RM- Gordon Watts 2016 (2).pdf (5864K), 41830 Partial Closing and Extension Letter.pdf (113K)

Dear Mr. Watts:

Attached please find a letter and records pertaining to your recent FOIA request.

Very truly yours,

Caitlin Q. Knutte
FOIA Officer

From: FOIAofficer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Poesley, Maura <MPoesley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

Date: Wed, Jun 8, 2016 2:29 pm

Attachments: 41830 RM- Joseph Younes.pdf (3296K), 41830 RM- Pleadings (1) 41830 RM- Pleadings (2).pdf (2284K), 41830 RM- Pleadings (3).p



DEPARTMENT OF PLANNING AND DEVELOPMENT
CITY OF CHICAGO

April 12, 2017

Gordon Wayne Watts
The Register
821 Alicia Road
Lakeland, FL 33801

VIA ELECTRONIC MAIL: Gww1210@aol.com

Dear Mr. Watts:

On behalf of the Department of Planning and Development (DPD), please be advised we are in receipt of your Freedom of Information Act (FOIA) request. Your request was dated and received on April 7, 2017. Specifically, the FOIA states and seeks the following request for public records:

Please email me an audio file of the "Regular Meeting" of the Commission on Chicago Landmarks, which occurred yesterday, Thursday, April 6, 2017 at 12:45 p.m. in City Hall, 121 North LaSalle Street, Room 201-A, 2nd Floor.

Enclosed for your review is the CD disc of the audio file from the April 6, 2017 Commission on Chicago Landmarks meeting.

Sincerely,

A handwritten signature in cursive script that reads "Tony Blinn".

Tony Blinn
Freedom of Information Officer
City of Chicago Department of Planning and Development
(312) 744-0986



April 26, 2017

Dear Customer:

The following is the proof-of-delivery for tracking number 7862-7122-6226.

Delivery Information:

Status:	Delivered	Delivery location:	821 ALICIA RD Lakeland, FL 33801
Signed for by:	Signature not required	Delivery date:	Apr 26, 2017 09:53
Service type:	FedEx Ground		
Special Handling:			

NO SIGNATURE REQUIRED

Proof-of-delivery details appear below; however, no signature is available for this FedEx Ground shipment because a signature was not required.

Shipping Information:

Tracking number:	7862-7122-6226	Ship date:	Apr 18, 2017
		Weight:	1.8 lbs/0.8 kg

Recipient:
JOSEPH YOUNES LAW OFFICES
JOSEPH YOUNES LAW OFFICES
166 W WASHINGTON ST
STE 800
CHICAGO, IL 60602 US

Shipper:
gordan watts
gordan watts
821 ALICIA RD
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

Reminder: AOL will never ask you for your password or billing information. [Show Images & enable links](#)

Subject: FedEx Shipment 786271226226 Delivery Exception
Date: 4/21/2017 10:29:46 P.M. Eastern Daylight Time
From: TrackingUpdates@fedex.com
Reply To: trackingm@fedex.com
To: www@aliohad.com
Sent from the Internet (Details)

Tracking # 786271226226

Ship date: Tue, 4/18/2017
Scheduled delivery: Mon, 4/24/2017 by end of day
Delivery exception

Shipment Facts

FedEx attempted, but was unable to complete delivery of the following shipment:

Tracking number:	786271226226
Status:	Delivery exception
Service type:	FedEx Ground
Packaging type:	Package
Number of pieces:	1
Weight:	0.70 lb.
Standard transit:	4/21/2017

Resolving Delivery Issues

The reason delivery was not completed is outlined below. Where applicable, resolution recommendations are also provided.

Exception Reason	Recommended Action
1. Refused by recipient - Not ordered	No action is required. The package is being returned to the shipper.
2. Shipment Refused by Recipient	No action is required. The package is being returned to the shipper.

C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

1 R011
gar chm watta (063) 880-2
821 ALICIA RD
LAWELAND FL 33001
VA

FedEx RETURN TO SHIPPER

Dear Customer - This package is being returned.

- Hold at Location - Expired.
- Delivery refused by: JOE

Because

- Incorrect delivery address/Recipient unknown/Clos.
 - Damaged. An inspection report has been completed.
 - The entire contents of the package are enclosed.
 - Damaged contents were discarded. The balance is enclosed.
 - Package is greater than the maximum size/weight allowed.
 - Delivery attempt unsuccessful/unable to reach recipient for alternate delivery instructions.
 - Improper HazMat packaging/labeling/documentation.
- ATTN FedEx Personnel: Attach the OP-908 & SF-136 to all Hazmats.

Other: _____

Package received on trailer from shipper:

- Crushed
- Wet
- Open
- Inadequate Packaging
- Oversize
- Overweight

AGENT APPROVAL SIGNATURE

RETURN STATE

TO FL

RETURN ZIP

TO 3380

Remove label here

7862 7122 6226

4-21 / 1944

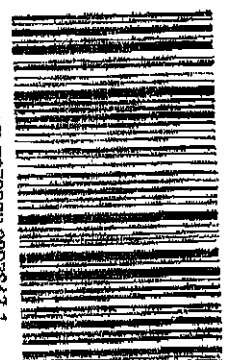
60602

9622 0417 3 (000 000 0000) 0 00 7862 7122 6226



Joseph Younes Law Offices
166 W WASHINGTON ST.
Phone: (312) 372-1122 - Fax
E-mail is (or was?) Raloc69

(9311912) 7370903 8893823 1



SMI043 LABEL REV 03/10 - RUN 1/2017

FACILITY:

NIP:

220-1580

JOSEPH YOUNES LAW OFFICES
166 WASHINGTON ST
CHICAGO, IL 60602-2311-89

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
Municipal Department – District 1 - Housing Section

CITY OF CHICAGO
Plaintiff,

vs.

1720 N SEDGWICK ST, ASSOCIATED BANK NA,
NON-RECORD CLAIMANTS, UNKNOWN OWNERS,
Atty. Joseph Younes, Esq., et al.
Defendants, and

Gordon Wayne Watts,
Proposed Intervening Defendant.

)
) Case No.: 2017-M1-400775
)

) Before: Hon. PATRICE MUNZEL
) BALL-REED, Associate Judge
) Case Type: HOUSING
) District: First Municipal
)

) **TIME-SENSITIVE:** to be heard
) in Court Room: 1105, by 05/18/2017,
) Court Time: 11:00am (CST)

↑
ARCHIVED
COPY
ADDED

MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS

Gordon Wayne Watts ("Intervenor") hereby moves this Court, pursuant to 735 ILCS 5/2-408, for permission to intervene in the above-captioned matter, or in the Alternative, for leave to file an *amicus curiae* brief, and for the previously-filed notice, and *this* instant notice/motion (and attached sworn Affidavit), to be deemed to be converted to and constitute said *amicus* brief.

1. The "Time-Sensitive Judicial Notice of Adjudicative Facts" (containing additional facts of interest regarding defendant Younes' behaviour and actions) which proposed Intervenor, Watts, filed with this Court on 04/22/2017, was timely docketed on 04/25/2017, and properly acknowledged as a *pro se* filing by a non-record claimant.
2. Mr. Richard B. Daniggelis, the true owner, who lost his house (1720 N. Sedgwick St., Old Town, Chicago, IL) through a forged signature in a mortgage fraud scheme (and which fraud tort is still being actively litigated and investigated in several forums, some Judicial and some Executive), was invited by this Court to intervene, in order that he might gain standing to participate in proceedings. The undersigned Intervenor is in communication with Daniggelis, and he asserts that Daniggelis informed Watts that he (Daniggelis) desires to take this Court up on its offer. *I.e., Daniggelis states that he wishes to Intervene.*
3. Intervenor, Gordon Wayne Watts, has done much research and work (see Appendix, *infra*) for Mr. Daniggelis, the latter of whom has indicted his desire to pay Watts for research & shipping services rendered.
4. Mr. Watts has the right to intervene under 735 ILCS 5/2-408(a)(2) because "the representation of the applicant's interest by existing parties is or may be inadequate and the applicant will or may be bound by an order or judgment in the action."
5. Moreover, Watts has the right to intervene under 735 ILCS 5/2-408(a)(3) because "the applicant is so situated as to be adversely affected by a distribution or other disposition of property in the custody or subject to the control or disposition of the court or a court officer."
6. This Motion is timely because Intervenor has filed his Motion before any party has filed any responsive pleading. Moreover, no parties would be prejudiced by granting intervention at this stage.

MEMORANDUM OF LAW:

PETITIONER IS ENTITLED TO INTERVENE AS A MATTER OF RIGHT.

Intervenor, Gordon Wayne Watts, has "unique knowledge" (backed up by a Sworn and Notarised AFFIDAVIT, as well as supported by facts and documented sources, not the least of the which is *DNAinfo*, a local newspaper, *and unique information garnered from Daniggelis, himself, but which he can not convey to the court due to limited legal knowledge*). Since his knowledge of the case is 'unique' and presents additional facts *and* additional legal arguments, by definition, the other parties are not representing said 'unique' facts and arguments, and therefore "the representation of the applicant's interest by existing parties is or may be inadequate," giving Watts the right to intervene under 735 ILCS 5/2-408(a)(2).

Moreover, Intervenor, Gordon Wayne Watts, has a sufficient interest in this case that warrants intervention as of right because the theft of Daniggelis' house forced him to begin using expensive storage facilities (for his belongings), made him homeless (or forced him to move in with some Good Samaritan), and all this costs a great deal of monies. The prior illegal construction/demolition that was Defendant Younes was documented to have performed on this house (see prior Watts filing), and the more-current illegal work, greatly in excess of City of Chicago Building Codes (which was the proximal cause of the above-captioned lawsuit by the City against Younes) caused **both financial and emotional harm to Daniggelis**. Moreover, the potential illegal destruction of the Sedgwick house (in this Historic District) would 'moot' any pending litigation and/or investigation into the illegal transfer of title.

The court's potential to allow illegal destruction of this historic-district house would make it infinitesimally-more difficult for Daniggelis to pay back Watts (due to the additional financial and emotional burden so-placed upon him.) Therefore, Watts is "so situated as to be adversely affected by a distribution or other disposition of property in the custody or subject to the control or disposition of the court or a court officer," giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3).

Where intervention as of right is asserted, "the trial court's jurisdiction is limited to determining timeliness, inadequacy of representation and sufficiency of interest; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted." *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984). [Emphasis added in underline & bold; not in original] Petitioner satisfies all three requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3).

Newly-discovered facts of a dispositive nature

This Court knows that defendant, Joseph Younes, has denied ever planning or conspiring to break the law in regards to executing 'excessive' work, beyond the permits. However, *DNAinfo* reported that a local attorney, who has no motives to be sued for slander, libel, or defamation of character, said quite the opposite:

"Jordan Matyas, who represented the Old Town Triangle Association at Thursday's court hearing, said Younes was being disingenuous in saying he didn't intend to level the site. "He's told me twice that he always wanted to demolish it," Matyas said, and he told the judge that he intended to pursue a demolition permit as well. "So we have some mixed signals from the owner, but his actions speak clearly about his intent for the building."" [Source: "'Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, *DNAinfo*, **March 30, 2017**: <https://www.DNAinfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city>] See also **EXHIBIT-A** in the instant filing. [Watts, who knew of this news item right after it published, on 3-30-2017, did not include it in his last filing, dated 4-22-2017, because he was struggling to file it in time for Judge Ball-Reed to get it before the 4-27-2017 hearing. Watts, by virtue of this statement, issues a sincere apology for his oversight & slowness here.]