

**In the Appellate Court of Illinois, First District**

Gordon Wayne Watts,

Plaintiff,

vs.

Hon. James P. Flannery,  
in his capacity as presiding judge, Law Division,  
Cook County, IL circuit court

and

Hon. Diane M. Shelley,  
in her capacity as circuit judge, Law Division,  
Cook County, IL circuit court,

Defendants.

Docket Number: 1-18-0538

**Motion – *En Banc* – for Reconsideration of Dismissal for Lack of Jurisdiction**

This matter comes before the Court on motion of Movant for Reconsideration of Dismissal for Lack of Jurisdiction of the 09/28/2018 Order entered by This Court (Hon. Mary Anne Mason, Hon. Terrence J. Lavin, and Hon. Michael B. Hyman, JUSTICES, for The Court).

Summary of Argument: This Court committed Gross Error in this holding, which is obvious when compared with **Gassman v. THE CLERK OF THE CIRCUIT COURT OF COOK COUNTY** (1-15-1738) and **Midwest Medical v. Dorothy Brown** (1-16-3230), both of which are examples of This Court having the authority to issue Mandamus Writs, as Art.6, Sec. 6 of the ILLINOIS CONSTITUTION (sentence 3) clearly says: “The Appellate Court may exercise original jurisdiction when necessary to the complete determination of any case on review,” which, of course, includes Mandamus actions. The Gross Error justifies *En Banc* treatment of this motion, so as to offer a check & balance against legal discord.

**Summary of the CASE and FACTS:** The circuit court made the appellant believe his motion for Intervention had been granted (see Exhibit-A), by putting his name on docket. But when the trial court entered an illegal ruling (upholding the title-theft of defendant, Richard Daniggelis' house, land, and hundreds of thousands of dollars in equity—without him having been paid anything), appellant remembered lots of well-documented monies Daniggelis owed him for Internet research, technological help, etc. This gave him legal rights (and needs) to intervene.

The trial court not only ruled incorrectly (causing great pain & harm to this elderly man), but would neither let the Intervenor, Watts, intervene, nor allow a qualified indigent litigant the

rights to sue/defend via Fee Waiver. Besides the appeal (in case #:1-18-0091), appellant moved for an original writ, in this case (1-18-0538). It is not without moment that This Court, in its 05/03/2018 Order in the sister-case, 1-18-0572 (Hon. Daniel J. Pierce, JUSTICE, writing for the court) held that: “This court has no jurisdiction to order the Cir. Ct. to allow Watts leave to intervene, grant a fee waiver, or to prepare the record on appeal & transmit to App. Ct. in this matter (1-18-0572). Motion denied.”

While no ill motives are imputed to any Justice (much less this Justice, who has twice graciously ordered extensions of time to prepare the Record on Appeal), nonetheless, this is not only illegal, but it places an impossible burden upon Appellant (who can not pay the estimated thousands of dollars for the full Record on Appeal in the very, very huge underlying Chancery case). Appellant asked both the circuit court and the reviewing court, here, for a Rule 321 order limiting the recorded to a handful of Sine Qua Non required filings to determine the Clear Fraud and Manifest Error of the lower tribunal in its reversal of the burden of proof—asking the elderly Daniggelis to prove the house was his, instead of requiring that the thieves prove that they aren't thieves, in spite of clear admissions by Judge Otto in his 3-8-2013 ruling, that there were duplicate signatures, which can not happen “by hand” (as it is impossible to copy your own signature exactly the same twice in a row). Otto's admission of this is damning proof of felony forgery that powered this title-theft Mortgage Fraud, yet the lower courts stood by their decision to steal the elderly victim's house, land, and hundreds of thousands of dollars in equity, without the man being paid a dime, and then being made homeless while elderly.

If the reviewing courts of appeals are not in the business of reviewing lower courts, then what is the business? This panel (in 1-18-0538) made a similar error, incorrectly claiming that it lacked authority to issue Mandamus Writs, in spite of clear facts to the contrary. We all know that ***City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984)** allows a person with unrepresented interests to intervene, to protect his or her interests, no? Thus with authority to issue mandamus (see the IL Constitution and cited case law, above) and reason to do so (error on the part of the trial courts, which caused great harm), the ball in in the court of the Reviewing Court, and given the magnitude, nature, and gravity of the legal errors committed by This Court, an *En Banc* review is appropriate.

While Movant, Watts, is not an attorney, he nearly won the largest case in the last century—all by himself—doing better, even than then Gov. Jeb Bush, before the same panel, which may be verified by looking at that court's docket:

**\*\* *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>

This would suggest that Watts' filings, and sincere allegations of grave missteps, may have some merit, and should be reviewed *En Banc*.

This Court should recognise that Movant is making an honest effort to meet the court and parties halfway, and make their jobs as easy as possible (by, for example, offering to pay for some of the Preparation of the Record on Appeal—even tho he is genuinely VERY indigent). In fact, since the case for Summary Judgment, returning ownership of Daniggelis' house is so strong, This Court might save itself some time, headache, & man-hours, by simply ordering the limited record suggested in prior filings, and then issuing summary judgment on this case, and, more generally, reviewing policy on the missteps that occurred above, when the court did not comply with clearly-established Rules, case-law, Constitutional Provisions, etc.

Although it seems unlikely that Appellant, who is quite financially strapped, could pay the estimated several-thousand-dollar Record on Appeal fees to prepare the record, were he to somehow do so, he would be entitled to Mandamus relief, as the case-law, cited in the motions filed in 1-18-0081, hold, and Mandamus would issue (from This Court or The IL Supreme Court) to compel reimbursement, because he qualifies for intervention, and (via poverty) for Fee Waiver. So, that being the case, why not grant relief now, so that we avoid that legal train wreck?

**This Court also violated a direct command of the Illinois Supreme Court, here recently, in a related case:**

[Date: 5/6/2015] No. 118434 - GMAC Mortgage, LLC, et al., respondents, v. Richard Daniggelis, petitioner. Leave to appeal, Appellate Court, First District. (1-14-2751)

Petition for leave to appeal denied.

In the exercise of this Court's supervisory authority, the Appellate Court, First District, is directed to vacate its order in GMAC Mortgage, LLC v. Daniggelis, case No. 1-14-2751 (09/24/14), denying Richard Daniggelis leave to file a late notice of appeal. The appellate court is instructed to allow Richard Daniggelis to file a late notice of appeal and hear the case. (27 N.E.3d 610 (2015))

**Let's looks again at the ORDER rendered here:** Notice that it doesn't say “hear” the case only if Atty. Galic files his merits briefs. Notice, please, it says to “hear the case.” Period. Now, no one will hold it against the appellate court judges for being human and getting side-tracked: **If This Court does not obey The Supreme Court's last order to hear the merits, four (4) parties will suffer harm:**

- (1) This Court will risk censure, embarrassment, & failure to obey the IL Supreme Court.
- (2) Mr. Daniggelis, who is elderly (about 80 or 81 at this time), was made homeless, *via title theft*.
- (3) Movant is owed monies as documented in Intervention filings, which need to be paid.
- (4) The Rule of Law would suffer, and who else would get denied a fair hearing, simply because he's a poor, out-of-state non-Lawyer?

**Conclusion:**

Movant is grateful for the kind patience of This Court in extending time twice already, but a failure to uphold the law for poor litigants who qualify for (because they can't afford) a Record on Appeal—and who legally (and morally) qualify for Intervention, would moot any extension of time. Therefore, This Court should review the record, and—on its own motion—permit a fair review of the merits of the case being appealed (whether it requires full prep of the Record or a limited R.321 Record as Movant suggests in prior filings).

There were so many blatant and obviously huge errors committed by This Court in the 3 sister-cases referenced (1-18-0091, 1-18-0538, and 1-18-0572), than an *En Banc* reconsideration is the only appropriate course to avoid a legal train wreck.

This Court might disagree with the requests made of it or disagree with the claims that This Court violated the law—and no disrespect is meant—but, if This Court disagrees with the legal analyses and/or the requests within the “four corners” of this brief, it should enlighten those on the outside as to why we are wrong via a clearer opinion, *En Banc*, after careful review.

Hopefully, however, the meager requests made with genuine intent to get justice, but not go overboard or destroy those who broke the law & executed title-theft, should be amenable to This Court, and to that end, Movant (supported by many others who are harmed by these title-theft thieves) moves This Court to execute justice after a careful review of the merits.

*Respectfully submitted,*

*/s/Gordon Wayne Watts*

**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument 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 verily believes the same to be true: “Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath.” Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: Wednesday, 17 October 2018

*/s/Gordon Wayne Watts*  
**Gordon Wayne Watts**

**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

\*\* Motion to Intervene (7-7-2017) – with documentation supporting

Exhibit-A

NO. 1-18-0538

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GordonWayne Watts )  
Plaintiff )  
vs. )  
) (An Original Jurisdiction action)  
Hon. James P. Flannery and )  
Hon. Diane M. Shelley )  
Defendants )

**ORDER**

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for an extension of time, and, notice having been given, and the Court being fully advised in the premises:

**IT IS HEREBY ORDERED** that the time for filing the Record on Appeal is extended to February 18, 2019, and, pursuant to **Rule 311(b)** [Rule 311. Accelerated Docket, (b) Discretionary Acceleration of Other Appeals], this appeal is placed on accelerated track. Pursuant to Rule 311(b), “The motion [to expedite] shall be supported by an affidavit stating reasons why the appeal should be expedited,” and This Court notes that both the instant motion and prior pleadings by Appellant had either 'Verification' affirmations, or actual Sworn/Notarized affidavits, which compel The Court to accept at face value allegations that an accelerated appeal is necessary. [This court notes that Watts' claims on this head were never challenged as false.]

**IT IS FURTHERMORE ORDERED** that the trial court shall grant Movant's motion for Intervention, Grant his application for fee waiver, and prepare 'selected' items described below:

This court finds, per Rule 311(b), that it is warranted by the circumstances, and This Court now enters a ruling that the trial court prepare only the following supporting record prepared pursuant to Rule 328, consisting only the following lower court pleadings:

- **All lower court pleadings – and related “exhibits” – filed by Gordon Wayne Watts**
- **The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC**
- **The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis**
- **The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis**
- **Two (2) “Answer” briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008**
- **The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis**
- **The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto**
- **The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]**
- **The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis**
- **The 12/06/2017 Motion to Comply filed by Robert J. More**
- **The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals**

**ORDER** – *Watts v. Flannery and Shelley*, 1-18-0538 (ILLINOIS First Appellate Court)

**The trial court shall** prepare the Record on Appeal, with ONLY the items listed above (all the enumerated items, and ALL pleadings and related exhibits filed by Appellant, Gordon Wayne Watts), **and shall** place preparation of the selected records on “accelerated” track, **and shall** notify This Court when the record is prepared, **and transmit it instanter to This Court.**

After This Court makes the “selected” Record on Appeal, above, available to all litigants, it shall give ALL named parties ONE last opportunity, within thirty (30) days, to respond and to include anything relevant in the record (to make up for anything that was omitted for the sake of brevity), and to file ONE supporting brief, which complies with page and word-length requirements, citing to any supplemental record items.

Since the 'Record on Appeal' shall be less than 100% of the total record (due to time and space constraints), This Court deems it necessary, to satisfy Due Process, to give ALL parties opportunity to respond, and then This Court shall, if no counter arguments are raised, return Richard Daniggelis' house to him, with equitable damages awarded, by Summary Judgment. The “last chance” to file a brief, to grant fair Due Process to defendants, Joseph Younes, and other named defendants, shall be considered a chance to reply to a “Show Cause” order, This Court asking litigants to show cause why Daniggelis' house should not return to him.

Whether or not litigants file an 'answer' brief (this is optional), This Court **shall** review The Record (and any “one-time” briefs, submitted, as described above), **shall** consider the facts and law, **and shall render a decision**, in compliance with the 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))].

**The trial court shall speedily prepare the selected record, notify this court, and transmit it to this court by electronic means, on accelerated docket.**

**IT IS SO ORDERED.**

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

Prepared by:  
Gordon Wayne Watts  
821 Alicia Road  
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**In the Appellate Court of Illinois, First District**

Gordon Wayne Watts,

Plaintiff,

vs.

Hon. James P. Flannery,  
in his capacity as presiding judge, Law Division,  
Cook County, IL circuit court

and

Hon. Diane M. Shelley,  
in her capacity as circuit judge, Law Division,  
Cook County, IL circuit court,

**Defendants.**

Docket Number: 1-18-0538

**NOTICE OF FILING**

To: See attached Service List

**PLEASE TAKE NOTICE** that today, Wednesday, 17 October 2018, I am causing to be filed with the ILLINOIS 1<sup>st</sup> Appellate Court my Motion for Extension of Time, Verification by Certification, Exhibits –with an Index to exhibits, Proposed Order, this NOTICE OF FILING, an updated/corrected SERVICE LIST, and my Certificate of Service, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
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Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
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**SERVICE LIST**

\* **1st District Appellate Court**, Clerk's Office, 160 North LaSalle St., Chicago, IL 60601 (312) 793-5484 , Office Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays [**served by eFiling only, since this The Court no longer accepts paper filings**]

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays

\* **Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602, Courtesy copy via: [Timothy.Evans@CookCountyIL.gov](mailto:Timothy.Evans@CookCountyIL.gov) [**served, as a courtesy, since he is not a party proper**]

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) [**served, as Judge Flannery is a defendant in the Mandamus proceedings**]

\* **Law Division and Hon. Diane M. Shelley, Circuit Judge, Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602** [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov) [**served, as Judge Shelley is a defendant in the Mandamus proceedings**]

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

\* **Richard B. Daniggelis** (who receives mail, via USPS mail-forwarding at his old address) 1720 North Sedgwick St., Chicago, IL 60614-5722 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

\* **Andjelko Galic** (Atty. for Richard B. Daniggelis) (Atty#:33013) C:312-217-5433, Fx:312-986-1810, Ph:312-986-1510, [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com) ; [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) 845 Sherwood Road, LaGrange Park, IL 60526-1547

\* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)

**SERVICE LIST (continued)**

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>  
312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E:  
[RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)  
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or:  
[PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

\* **Paul L. Shelton**, *Pro Se*, (Atty. #15323, disbarred per IARDC) E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ;  
[PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291, last known emails (see **Exhibit-G**) are as follows: [ERRegi@mail2.tread.net](mailto:ERRegi@mail2.tread.net), [Erika.Rhone@SbcGlobal.net](mailto:Erika.Rhone@SbcGlobal.net),  
[Erhone@Mindspring.com](mailto:Erhone@Mindspring.com), [Erika@GrandKahn.com](mailto:Erika@GrandKahn.com), [ErikaRhone@sbcglobal.net](mailto:ErikaRhone@sbcglobal.net),  
[ER5526199@aol.com](mailto:ER5526199@aol.com) and per: [https://www.FastPeopleSearch.com/ms-erika-r-rhone\\_id\\_G-5317261083665188477](https://www.FastPeopleSearch.com/ms-erika-r-rhone_id_G-5317261083665188477)

\* **Rosa M. Tumialán** ([RTumialan@Dykema.com](mailto:RTumialan@Dykema.com)) (312) 876-1700, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300 Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]

\* **Dawn Williams** ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com)) ([DPeacock@KentLaw.iit.edu](mailto:DPeacock@KentLaw.iit.edu)) Note: Served to work address, as she has NOT been excused by Court as an attorney of record—but not served to personal email, as a courtesy, as she claims, via auto-responder email, to no longer work at DYKEMA. Phone: 616-776-7518, DYKEMA GOSSETT PLLC, 300 Ottawa Ave., N.W., Suite 700, Grand Rapids, MI 49503-2306 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]

\* **Atty. Justine A. Lewis, Esq.** ([JLewis@Dykema.com](mailto:JLewis@Dykema.com)), Senior Manager, Recruiting and Professional Development \*\* Note: Now included on service list per official email from Dykema – see **Exhibit-H**. Phone: 312-876-1700, FAX: 866-771-2154 or 312-876-1155, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300, Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX] Chicago office address per: <https://www.Dykema.com/www.dykema.com/careers-associates-opportunities.html>

**SERVICE LIST (continued)**

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 **[[Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.]]**

\* **Associated Bank, N.A.**, 200 North Adams Street, Green Bay, WI 54301-5142  
Web: <https://www.AssociatedBank.com/about-us> PH: (920)433-3200, (800)236-8866, or (800)682-4989, Email address: [WeCare@associatedbank.com](mailto:WeCare@associatedbank.com) per: view-source:<https://www.AssociatedBank.com/contact> and: [ShareHolders@AssociatedBank.com](mailto:ShareHolders@AssociatedBank.com) per: <http://Investors.EquityApartments.com/drip.aspx?iid=100135> and [ColleagueCare@AssociatedBank.com](mailto:ColleagueCare@AssociatedBank.com) per: <https://AllHispanicJobs.com/s/find-associated-bank-jobs-in-usa>

\* **MERS (Mortgage Electronic Registration Systems, Inc.)** <https://www.MersInc.org/about-us/about-us> a nominee for HLB Mortgage, (703) 761-0694 / (800)-646-MERS (6377) / 888-679-MERS (6377) ATTN: Sharon McGann Horstkamp, Esq., Corporate Counsel, Mortgagee: <https://www.MersInc.org/component/content/article/8-about-us/401-sharon-horstkamp> Senior Vice President, Chief Legal and Legislative Officer, and Corporate Secretary for MERSCORP Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ; [SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ; [SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ; [KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: **MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512**

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**  
Removed from service list, and not served, as the court excused them as parties—see **Exhibit-I**.

\* **Stewart Title, Attn: Leigh Curry**  
Removed from service list, and not served, as the court excused them as parties—see **Exhibit-I**.

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 **[[Mr. Indyke claims to not represent any party in the instant appeal, but the undersigned can not find any more recent atty of record for defendant, LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The Court.]]**

**In the Appellate Court of Illinois, First District**

Gordon Wayne Watts,

Plaintiff,

vs.

Hon. James P. Flannery,  
in his capacity as presiding judge, Law Division,  
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and

Hon. Diane M. Shelley,  
in her capacity as circuit judge, Law Division,  
Cook County, IL circuit court,

**Defendants.**

Docket Number: 1-18-0538

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

\* The undersigned **Defendant-Appellant, Gordon Wayne Watts**, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Motion for Extension of Time, Verification by Certification, Index to exhibits, Proposed Order, NOTICE OF FILING, an updated/corrected SERVICE LIST, and this Certificate of Service, and attached EXHIBITS**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – **today, this Wednesday, 17 October 2018**, via **the Odyssey eFileIL (TylerHost.net) Electronic Filing system** if they're e-file registered.

\* I am NOT any parties via **First Class U.S. Postal Mail** –*as I customarily do (due to financial constraints), as Rule 11 does not require hard-copy service if email is used.*

\* Additionally, 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 April 2017—see e.g., the “Open Source Docket” link in said news item.

\* Lastly, I am concurrently effecting service via **e-mail.**

***Respectfully submitted,***

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]

821 Alicia Road, Lakeland, FL 33801-2113

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

Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>

Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

*Watts v. Flannery and Shelley*, 1-18-0538 (ILLINOIS First Appellate Court)

**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

\*\* Motion to Intervene (7-7-2017) – with documentation supporting

Exhibit-A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

#99500

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.  
aka: "LaSalle Bank National Association," aka "US Bank,  
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,  
Plaintiff,

vs.

Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,  
Defendants, and

Gordon Wayne Watts,  
Proposed Intervening Defendant.

Case No.: 2007 CH 29738

Before: Hon. DIANE M. SHEPHERD,  
Circuit Judge

Case Type: CONTRACT  
District: First Municipal  
Calendar "W", Courtroom 1912

**TIME-SENSITIVE:** to be heard  
in Court Room: 1912, by 07/10/2017

Court Time: 10:30am (CST)

FILED-17  
JUL - 7  
AM 10:55

3303  
3004  
2800  
3320

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 attached "MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS," being filed instanter, in the above-captioned case—a copy of which is attached hereto and is being served upon you.

Due to unfamiliarity with this very uncommon "local rule," movant did not give proper "notice" of past motions, via the "notice of motion," in accordance with said local rule, which is peculiar to this court alone. As This Court can see, the attached Motion to Intervene gives overwhelming evidence of Movant's right to claim legal standing to intervene – and that the interests not being represented are **\*\*not\*\*** "de minimus," (unless the court and parties are willing/able to reimburse to Mr. Watts the **full** amount documented herewith, and *then* some for unrecorded costs, time lost from work, and emotional losses).

**Moreover:** The undersigned Intervenor, Gordon Wayne Watts, through human fault, committed three (3) *unintentional* offenses against This Court (and all parties), and, by virtue of this pleading, is offering a sincere apology:

(1) While the undersigned litigant has generally had excellent and professional relations with the many clerks and lawyers involved (*in Chancery, Civil, and Law Divisions, as well as numerous judges' chambers and the chambers of the Chief Judge, as well as the Office of the State Attorney, and the IL Attorney General*), on rare occasion he has expressed human emotion to certain unnamed clerk(s), expressing **profound** disappointment over the rulings in the various cases regarding defendant, Daniggelis. While this is inexcusable and indefensible, Intervenor, Watts, views Daniggelis as sort-of a grandfather-figure (*whom he feels was cheated out of a house, property, and hundreds of thousands of dollars of equity therewith*), and, all of us being human can understand that if you kick a dog repeatedly (Mr. Watts is comparing *himself* to a dog), the dog will eventually yelp or holler. This does **not** justify the yelping bark, but it is offered up as "mitigating circumstances." **Therefore, Mr. Watts offers his sincere apologies for occasional lapses in professionalism.**

(2) Although Mr. Watts' legal standing to Intervene is very strong (see above—and the attached motion to intervene), he felt an "amicus" brief would be less invasive and more acceptable. While this may be the view of *most* courts, nonetheless, for reasons unknown, case law suggests that Cook County, IL courts take a much dimmer view of *amicus curiae* briefs than they do of, say, Intervention actions. **Therefore, Mr. Watts offers his sincere apologies for taking an unintentionally-offensive legal tact, and is hereby changing course to a more accepted and conventional course: that of direct intervention, as provided by statutory and case law.**

(3) As mentioned in the instant “Notice of Motion,” Intervenor, Watts, was unfamiliar with this uncommon rule (Local Rule 2.1, requiring a “notice of motion” to accompany motions) which appears unique to Cook County, IL courts—and therefore didn't comply with the rules of the court. **Therefore, pursuant to R.2.1, proper notice is being given of the above-mentioned motion—and an apology herewith is tendered to the court and parties.**

**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 propria 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 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-A). 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-A)

(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-B) 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. 11<sup>th</sup> 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-B)

**(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.)**

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 ruling<sup>1</sup>, 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.**

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<sup>1</sup> *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. Thus judge's statement/claims was false, and slanderous, but we're all human, and make mistakes—and this argument & documentation of slander/libel is **\*\*not\*\*** meant as disrespectful of the judge or the court.*



**Prayer(s) for Relief:** Therefore, please review and rule on my motion for intervention, filed *instanter*, granting speedy relief to effect justice for both Defendant, Mr. Daniggelis, as well as Intervenor, Mr. Watts.

Arguments defending this position are on docket, as This Court has been good enough to grant extensive **Procedural Due Process** and document (by docketing) the sworn affidavit and arguments of the undersigned Intervenor—in prior filings he has submitted within the last several years to the Chancery, Civil, and Law Divisions of the Cook County, IL circuit/trial courts.

While a “CASE SET ON TRIAL CALL” [whether “bench trial” or a “trial by jury”] might theoretically grant justice, this is passing the buck; **and**, as The Court created this problem (by transferring title without legal justification—a brute show of force, and no more), therefore the court, which created the problem should decline to “pass the buck” to a “trial call,” and, instead, solve that problem which it, *itself*, created. Now, I pray This Court speedily grant speedy **Substantive Due Process** on any & all claims of Redress which I've previously made—and which were made by Defendant, Mr. Richard B. Daniggelis.

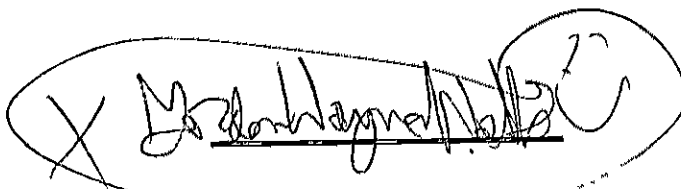
I realise that I'm effectively asking for a “Summary Judgment,” which is addressed and circumscribed by Local Rule 2.1(f) (“Filing motions for summary judgment in the Law Division”). This sub-section states *en toto*: “All motions for summary judgement shall be filed and duly noticed for hearing such that the motion comes before the court for initial presentation and entry of a briefing schedule not later than forty-five (45) days before the trial date, **except by prior leave of court and for good cause shown** or unless a deadline for dispositive motions is otherwise specified in the case management order.” [Emphasis added for clarity; not in original]

**Here is 'Good Cause':** Since the nature and magnitude of the injustices are egregious, and since the court and parties have all had very ample opportunities to hash out their arguments, it would prejudice no one should the court issue an order of show cause to Mr. Younes as to why title should not transfer back to its rightful owner—or (simpler & better yet), should the court issue a summary judgment as a matter of law—in favour of Daniggelis. **To decline to issue a summary judgment would fulfill the prophecy: “Justice delayed = Justice denied.”**

**Specifically,** This Court is asked to return title of 1720 N. Sedgwick St. to its rightful owner, Richard B. Daniggelis (and award damages as it sees fit for his numerous losses—not the least of which is the fact that he's losing huge amounts of monies paid out-of-pocket for storage of his belongings, as well, possibly, as rent to procure a replacement housing—so that he does not have to live on the streets or in his van—as was reported widely, in the recent past), unless The Court can offer an excellent, detailed, and coherent explanation to the contrary. [Note: While Judge Otto made valiant efforts to argue against justice here, none of his legal arguments were sound or persuasive, excepting the one pointing out that the trial courts had temporarily lost jurisdiction when the matter was on appeal. The mandate has issued, and that appeal is finalised, so no longer will that dog hunt: The trial court is responsible for cleaning up its own messes.] **Respectfully: If This Court disagrees with the legal arguments herewith, I hereby move The Court – and all of its judges – to grant a motion for clarification to the contrary. Barring that, relief is sought as previously requested.**

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:

**LAW DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 801  
Law@CookCountyCourt.com ; (312) 603-6930 ; (312) 603-5426  
Chicago, IL 60602 – , Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

**Hon. Diane M. Shelley, Circuit Judge, Law Division:**

[Note: I may, for the convenience of the new judge, who replaces Judge Sanjay T. Taylor, include a few hard copies of old filings, but shall not serve them upon other parties, as I've already served them properly.] ;  
[ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov)  
(312) 603-5940, (312) 603Diane.Shelley@CookCountyIL.gov-7551, (312) 603-4811  
Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602

**Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)**

(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)

Email: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) ; [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com)

134 N. LaSalle St., STE 1040, CHICAGO IL, 60602

(Note: The Nov. 16, 2015 proposed order by Mr. Galic in the Law Division case by the same case number suggests that STE 1810 is a old address and that he is now in STE 1040.)

**Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl. Assn.), Email: [RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net)**  
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

**Mr. Robert J. More ([Anselm45@Gmail.com](mailto:Anselm45@Gmail.com))** I represent to the court that Mr. More has consented to email service and prefers this method exclusively.

**Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)**

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221

<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com)

or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

(Note: Mr. King has informed me that the Wacker Drive address is outdated and that this address is the current service address, and his law office website, listed above, confirms this is correct.) I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods.

**Paul L. Shelton, Esq.**

E-mail: [PMSA136@aol.com](mailto:PMSA136@aol.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) As the court has seen fit to deem Shelton a non-party and not in need of service (see comments in the orders in question, and the service list of same), I'm not serving Mr. Shelton a hard copy, just electronic copies.

\* **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](mailto: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](mailto:Hugh@HughDHowardLaw.com), per: <http://www.HughDHowardLaw.com>

**MERS (Mortgage Electronic Registration Systems, Inc.)**

<https://www.mersinc.org/about-us/about-us>

a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: [JanisS@mersinc.org](mailto:JanisS@mersinc.org)

Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email:

[SandraT@mersinc.org](mailto:SandraT@mersinc.org) – Director, Corporate Communications

Note: MERS is only being served electronically per above.

**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. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

- E-mail: I am contemporaneously serving all the parties listed above via email, in such cases as I have their e-mail address.

- 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: *Gordon Wayne Watts* Date: Thu 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](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)

Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**Date: Thursday, 06 July 2017**

## INDEX TO THE EXHIBITS

<u>Instrument</u>	<u>Docket/Tab#</u>
Case law citations to the “Terri Schiavo” (aka: the Florida 'feeding tube girl') case	Exhibit-A
Court ruling & docketing information in the recent “Gay Marriage” case, heard before the U.S. 11 <sup>th</sup> Circuit FEDERAL Court of Appeals, in Atlanta, Georgia	Exhibit-B
FedEx package refused by Atty. Joseph Younes 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)	Exhibit-C

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

Exhibit-A

\* *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 (11<sup>th</sup> 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>

Court ruling & docketing information in the recent "Gay Marriage" case, heard before  
the U.S. 11<sup>th</sup> Circuit FEDERAL Court of Appeals, in Atlanta, Georgia Exhibit-B (1<sup>st</sup> 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: 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

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

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

ELBERT PARR TUTTLE COURT OF APPEALS BUILDING  
56 Forsyth Street, N.W.  
Atlanta, Georgia 30303

John Ley  
Clerk of Court

For rules and forms visit  
[www.ca11.uscourts.gov](http://www.ca11.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/rvg  
Phone #: (404) 335-6169

MOT-2 Notice of Court Action



**FedEx package refused by Atty. Joseph Younes** **Exhibit-C**  
**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.

---

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

**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.

---

<b>Shipping Information:</b>			
<b>Tracking number:</b>	7862-7122-6226	<b>Ship date:</b>	Apr 18, 2017
		<b>Weight:</b>	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.

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:** TrackingUpdates@fedex.com

**Reply To:** trackingmail@fedex.com

**To:** [jyounes1210@aol.com](mailto:jyounes1210@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.

FedEx package refused by Atty. Joseph Younes

Exhibit-C

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

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

1-800-MyFedEx (463) 888-8888  
BEL, ALICIA RD  
LAKELAND FL 33801  
US

**FedEx. RETURN TO SHIP**  
Ground

Dear Customer - This package is being ret.

- 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 attempts unsuccessful/unable to reach recipient for alternate delivery instructions.
- Improper HazMat packaging/labeling/documentation. ATTN FedEx Personnel: Attach the OP-908 & SF-436 to all Hazmats.
- Other:

Package received on trailer from shipper:

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

1862 7122 6226

4-21/199M

60602

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

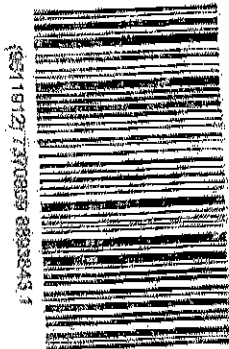


3-5-16, per website  
p:Joseph.Younes/299467626

MCC  
D00  
308 312 372-1122 : Fa  
10891  
33801  
0-999  
4-21-17

STATION  
4-21-17  
MANAGED BY  
MGMT. APPROVAL SIGNATURE  
RETURN STATE  
TO FL  
RETURN ZIP  
TO 33801  
Remove label here

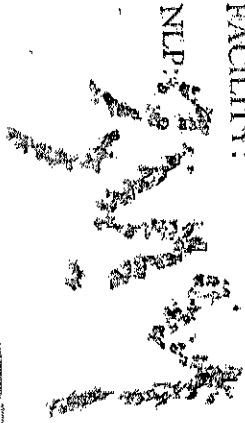
Joseph Younes Law Offices  
166 W WASHINGTON ST.  
Phone: (312) 372-1122 : Fa  
Email is (or was?) Roloc69



220-1580  
60602-2311-88  
JOSEPH YOUNES LAW OFFICES  
166 W WASHINGTON ST  
CHICAGO, IL 60602  
F 111 00 00 54-10 801748

SNRAG LABEL, REV 03/10 - RUN 1/2017

FACILITY:



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.  
aka: "LaSalle Bank National Association," aka "US Bank,  
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,  
**Plaintiff,**

vs.

Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, *et al.*,  
**Defendants, and**

Gordon Wayne Watts,  
**Proposed Intervening Defendant.**

) Case No.: 2007 CH 29738  
)  
) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
) Case Type: CONTRACT  
) District: First Municipal  
) Calendar "W", Courtroom 1912  
) **TIME-SENSITIVE** to be heard  
) in Court Room: 1912, by 07/19/2017  
) Court Time: 10:30am (CST)

FILED - 03  
2017 JUL 7 10:55  
CIRCUIT COURT  
COOK COUNTY  
ILLINOIS

~~[Sworn, Witnessed, and Notarised]~~  
**AFFIDAVIT OF GORDON WAYNE WATTS**

(ORIGINAL)  
~~SIGNED~~  
COPY

STATE OF FLORIDA  
COUNTY OF POLK

Before me, the undersigned Notary, on this 5<sup>th</sup> day of July, 2017, personally appeared Gordon Wayne Watts, known to me to be a credible person and of lawful age, who first being duly sworn, upon his oath, deposes and says:

**AFFIANT STATEMENT:** I, Gordon Wayne Watts, declare (certify, verify, and state) under penalty of perjury under the laws of the United States of America and the States of Florida and Illinois that the following statement is true and correct to the best of my knowledge:

I personally know Richard B. Daniggelis, a defendant in the above-captioned case, and who was named as a defendant in at least four (4) cases related to the same subject matter: Deutsch Bank v. Daniggelis, et al. (2004-CH-10851), GMAC Mortgage, et al. v. Daniggelis, et al. (2007-CH-29738) [heard in CHANCERY and transferred to the LAW DIVISION, e.g., the above-captioned case, thus counting as "two" cases], and Younes v. Daniggelis (2014-M1-701473). Mr. Daniggelis made me aware of mortgage fraud; while I believed him, I had no proof of it. However, I later obtained proof of fraud and discovered that This Court hadn't been made aware of much of the proof that I found through my own private research. So, I felt moral obligation to bring this to The Court's attention via a previously-filed a "Friend of the Court" brief with This Honourable Court in all of the above-captioned cases, excepting the Deutch Bank case. – I submitted: Statements of Facts, Documentation to Verify, and Arguments whereof.

**FURTHER AFFIANT SAYETH:**

(1) HOWEVER, after having done much research for Mr. Daniggelis (costing me time lost from work, labour, and public records fees to research and obtain numerous documents & facts, not to mention emotional distress), he has agreed to pay me monies owed; but, due to the situation of him having lost his house in mortgage fraud, this places, upon him, a financial burden [rent that Mr. Daniggelis has lost due to a cloud on the title, attorneys fees, & costs to obtain replacement housing and storage for his belongings, at the least].

(2) While *Amicus Curiae* briefs are not a matter of right (but at the court's discretion), nonetheless, I know that his hardships reduce the chances of him paying me what is owed, thus giving me an absolute right to Intervene under 735 ILCS 5/2-408(a)(2) because "the representation of the applicant's interest [e.g., what he owes me in labour, time lost from work, and Public Records pull fees, etc.] by existing parties is or may be inadequate and the applicant will or may be bound by an order or judgment in the action."

(3) Moreover, I state, for the record, that I have the right to intervene under 735 ILCS 5/2-408(a)(3) because “the applicant [the undersigned Affiant] 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.”

(4) I am the sole author of this affidavit, the accompanying proposed “*Motion to Intervene*,” and the related “notice of motion,” as required by the rules of your court.

(5) Although I have previously submitted a sworn & notarised Affidavit in both the Chancery case (on 8/10/2015) and the above-captioned case (on 9/14/2015), as well as legal arguments, supporting documentation, and statements of fact (in my prior briefs), **there have been several new developments** (as well as overlooked facts & legal arguments) **that compel me to take my valuable & limited time to carefully write up** (hopefully) this last & final Affidavit (and related filings) to help shepherd Mr. Daniggelis' case through the court—and, of course, to avail myself of my **Rights of Intervention**, as proscribed by ILLINOIS statutory and case law:

My intervention as of right is asserted, and “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 (1<sup>st</sup> Dist. 1984). [Emphasis added in underline & bold; not in original] I satisfy all three requirements, giving me rights to intervene under 735 ILCS 5/2-408(a)(3).

**NEW DEVELOPMENTS:** Very recently, I got an unexpected email response from (disbarred) Atty. Paul L. Shelton (the former law partner of Joseph Younes, and who conspired with Younes to defraud Daniggelis out of his house, title, and land), in response to me serving him his “service copies” of my filings, via email. (*See attached.*) Mr. Shelton has been very helpful, to me, in comparing notes and candidly discussing this case, and **a few of his observations are worth bringing to This Court's attention:** As we all recall, Shelton was not only stripped of his broker's license by the IDFPR, but subsequently, he was disbarred, and thus stripped of his IL law license, by the IARDC—and, in both instances, for mortgage fraud, as the publicly-accessible IL Records clearly show. (Both of Shelton's disbarments, above, made me suspect Younes, since both law partners were named defendants in numerous of Daniggelis' cases—*also* involving mortgage fraud.)

Mr. Shelton told me in his May 16, 2017 reply (see attachments) that: “This is personal and confidential and I'm trusting that none of what I say here is used against me.” For that reason [and because the 3 emails comprise **fourteen (14) pages**, which is a bit lengthy for the court's review], I'm hesitant to include his replies. HOWEVER, after reviewing his replies, nothing, in my opinion would do him any harm or injury. (His loss of law license means it can't get any worse, other than criminal charges, and nothing he said makes his case any worse. In fact, I have hopes that if he “turns state's evidence” & helps The Court by testifying, he can get some form of leniency or partial reinstatement.) MOREOVER, This Court need not read through the minutiae of our email exchange, but I must include, in relevant part, key portions, “in context,” of our exchange to verify & demonstrate genuine authenticity, e.g., that it was Mr. Shelton (not myself) who wrote his reply.

The key thing that Shelton tells me is that: “**But in reality, he [Daniggelis] gave her [Erika Rhone] POA and she had [legal] right to alter deed, even date, “forge” it or sign properly as attorney in fact. That is the judges point.**” [Comments in bracket to clarify; not in Shelton's original reply.] While this may seem irrelevant to the casual reader (what 2 non-Lawyers are discussing), I include this “new development” because I believe sitting judges may accept this wrong view of statutory and case law: As This Court can see in my “Thu, May 18, 2017 at 6:56 AM” reply to Atty. Shelton, he's incorrect, & I cite several sources to verify, including LeagleBeagle.com, Caring.com, LegalZoom.com, StandardLegal.com, and NationalNotary.org, all which all clearly state that you can not “forge” another person's signature, even if you are their POA (Power of Attorney), and moreover, you must make it clear that you are signing *\*as\** the POA for the principal. **In fact, StandardLegal clearly states that:** “When signing on behalf of a Grantor as Attorney-in-Fact, you should always sign YOUR OWN NAME, followed by the words “Power of Attorney”.

Do NOT sign the Grantor's name — EVER!

By signing your own name with the words "Power of Attorney" after your name to any contract or other legal document, the person receiving the documents signed by you on behalf of the person who granted you the Power of Attorney understands exactly what is being provided." <http://www.StandardLegal.com/blog/if-i-have-power-ofattorney-how-do-i-sign-legal-documents-on-behalf-of-my-grantor>

Shelton goes on to say (see email exchanges) how he was trying to help Daniggelis and now regrets it, and he implores me to not waste my time with him. Shelton also answered legal questions about whether one needed their own money at closing, and the difference between a mere notice of deposition and an official & binding subpoena. Finally, Shelton goes on to say:

"A lot of your legal arguments are very valid...but you are fighting for a liar and scammer. I firmly believe that. Your resources are being wasted in the eyes of God." [In his 5/16/2017 11:14:43 P.M. Eastern Daylight Time reply] and: "Good luck but please leave me alone if possible." [In his 5/16/2017 6:49:24 A.M. Eastern Daylight Time reply, that morning].

I agree with Shelton on some of what he says (about the strength of my legal arguments), but disagree that it is a waste of time, and I'm hoping that This Court does not prove him right on this point. He asks me to leave him out of it "if possible," but since he's a material witness in the criminal Grand Theft of a house and land, by means of clear & obvious forgery, he can't be "out" of it except by leave of This Court, and even that (if the court issued such an order) would be contrary to loads of case law & statutes regarding witnesses, crimes, *etc.*

**\* Relevant Legal Arguments which came up in newly-discovered email exchanges with SHELTON \***

But, in short, I include our email exchange because I believe his claims that the judges may have used this (incorrect) legal standard, namely, falsely assuming that a POA could legally forge the signature of the principal. (And, I school him on the terms of the contract, showing that even assuming the POA existed, it was a "limited" POA, limited both by scope and time, and both made it illegal to transfer title, as it was for a sale, not a quit claim, and no sale ensued as there was no payment to Daniggelis—and his signature was clearly forged.

**\* Overlooked Legal Arguments & Statements of Fact that DANIGGELIS has desired to be included \***

Richard Daniggelis has told me, on numerous occasions, of his desire to include both certain legal arguments and certain recollections of which his attorney, Andjelko Galic, did not include in his filings. As I'm intervening as a matter of right, I have a right to include said "orphaned" legal arguments and statements of fact:

- 1) Richard has repeatedly asked me why Younes didn't evict him right away, after having gotten "legal" title to the house, from Judge Otto's ruling and/or Judge Diana Rosario's order in the Civil Court. Mr. Daniggelis clearly told me that he felt Younes was afraid of being found out for mortgage fraud, or else he would've evicted him sooner.
- 2) Mr. Daniggelis also told me that Judge George F. Scully, Jr., who apparently was assigned the civil division case, at one point, said (in open court, I think) that he had had lunch with Judge Michael F. Otto (who was a Chancery judge for Daniggelis' case at one point). **Daniggelis then said that shortly thereafter**, Judge Scully adjured & warned Younes to "be careful for what you ask for—you just might get it" or words to that effect. While I'm not sure of what legal significance this might have, Daniggelis said that he felt that Scully & Otto had discussed the matter privately at lunch, and I include it in my statements, in order that the record not be lacking. (As this is probably the last chance to include relevant filings—I want to give The Court all the tools it needs to do its job.)
- 3) As further clarified in "Exhibit-D" of my 04/17/2017 filing to This Court, Richard asked me to

search for & locate documentation which would support his theory that Younes' complaints to the Office of the Attorney General (OAG) intimidated the banks & title companies, thereby blackmailing them into colluding to commit R.I.C.O. Crimes—and intimidated into giving him a “sweetheart” loan modification. [While it's harder to prove collusion or intent, it's a matter of record that the bank did, in fact, reduce both the interest and principal of Younes' loan by huge amounts—as I clearly document.]

- 4) When discussing this matter with one mutual friend, has asked me if the original signature (you know, the one I'm alleging is forged) could be produced by the banks and/or Atty. Joseph Younes. My friend was implying that since Daniggelis' signature was forged (he's a mutual friend of Daniggelis and myself, and believes Daniggelis' claims), no original existed: It was a photocopy, e.g., felony forgery fraud. Since my friend's observation is good, I include it in my overlooked legal arguments, here.
- 5) **This Court** is fully aware of the fact that John LaRoque has continued to (illegally) evade deposition by Daniggelis' attorney, Andjelko Galic. While I don't know what Galic might ask him (nor do I know what LaRoque is trying to hide), it's painfully obvious—even to any blind person—that John LaRoque is trying to hide something, and I think that “something” is further proof/details of the forgery fraud.
- 6) Richard repeatedly told me that when people hear he signed the POA & the first Warranty Deed (where his signature wasn't forged), they automatically think that this is proof that he just “gave away” the house. Because of that, Richard has been trying (in vain, I might add) to somehow convey to This Court that this isn't true—and offer a sound legal explanation. Since Richard is unable (and his attorney is either unable and/or unwilling), I shall do so—since it represents my interests in Intervention: Richard told me (repeatedly) that other attorneys had previously had him sign Warranty Deeds (like he did here) to help them in their negotiations to discuss refinancing, part-ownership shares, or other matters—and that, in no instance did any attorney try to take title. Because of this, when Younes & Shelton asked Daniggelis, in like-manner, to sign a warranty deed & POA, he believed it was necessary for the transaction—and that it was not his intent to simply “give away” the house—based on past attorney interactions—and based on what Younes & Shelton told him—in their official capacity as attorney at law.
- 7) Daniggelis has said (or implied) numerous times that people view him as helpless & pushover because of his advanced age (I think he is 78 year-old or so, at this time), and that they think it would be “unwise” to allow him to hold title. But, since Daniggelis has said that he thinks he can get a reverse mortgage and/or sell shares to Investors, and/or rent out rooms, therefore these arguments (about his age and alleged inability to manage the house/land) must be rebutted and resisted. **Here, I am so doing.**
- 8) Daniggelis has said that, at one court hearing (I think, while waiting for court to convene) that Younes said that he wanted to “wash his hands” of 1720 N. Sedgwick, since it was becoming more trouble than it was worth. While I'm not sure of any “direct” legal relevance, here, this recollection (and others above) that Daniggelis made might be useful in helping understand the issues. So, since Daniggelis can't enter them into the record—and since I have legal rights of intervening, I shall do so, here.
- 9) Oh, and perhaps the most interesting (and possibly useful) recollection that I must add is *this* one: When Judge Michael F. Otto, the Chancery Division judge for GMAC v. Daniggelis (the case that was transferred to the Law Division, the above-captioned case) entered his 5/15/2014 order snatching title from Daniggelis—and giving it to Younes—**Mr. Daniggelis tells me that he jumped up in court and blurted out to the effect of: “Hey, if I were not the true owner of 1720 N. Sedgwick, then why was there a huge monetary judgment settlement by Stewart Title to me, for such-and-such amount!?”** Mr. Daniggelis tells me that Judge Otto was startled & possibly frightened by the fact that he'd just entered an incorrect order, but that he was unwilling to admit any wrongdoing, and—instead—Daniggelis tells me that Judge Otto “passed the buck” and said: “Ah, we're going to have to transfer this case to the Law Division,” or words to that effect. [I would add: 'Passing the Buck' is not good practice, and diminishes the reputation of the court—since, of course, The Buck Stops Here, and the matter should be decided here—and not elsewhere.]

**Closing statement:**


I fully know, realise, & understand that This Court has received lots of lengthy written filings from me, and I'm not joyful or happy at the thought that it might be difficult to read (because of the length).

*[Just remember, tho: As hard as it may be to read, it was 10X harder for me to write, so please appreciate that.]*

I am not trying to make This Court's job harder—or be “vexatious” in any manner—since I know judges, clerks, & staff are all human, like myself. (And, as stated in my opening arguments in my Intervention, I inserted a rare apology for being slightly emotional with certain unnamed clerks. But, as Daniggelis is like a grandfather to me, and his repeated mistreatment—and this court's refusal to grant him justice—is like continually kicking a dog, **then I will compare myself with a “dog”** and say that while barking is not necessarily right, nonetheless, I beg Forgiveness and Pardon from This Honourable Court for being human: If you keep kicking a dog, it will eventually yelp.

Therefore, I respectfully submit this sworn, witnessed, & notarised Affidavit, which should serve as a legal proxy for the “Statements of the Case & Facts” in my legal briefs.

FURTHER AFFIANT SAYETH NAUGHT

  
Gordon Wayne Watts, Affiant

STATE OF FLORIDA  
COUNTY OF POLK

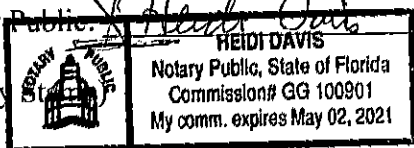
The foregoing instrument was acknowledged, subscribed, and sworn before me this 5<sup>th</sup> day of July, 2017, by GORDON WAYNE WATTS, Affiant, who (is / is not) personally known to me, who (did / did not) produce identification as shown below, and who (did / did not) take an oath.

IDENTIFICATION TYPE: Drivers License

IDENTIFICATION NUMBER: (\*) W320-299-66-176-0

(\*) In compliance with Rule 138, ILLINOIS SUPREME COURT RULES, “Personal Identity Information”. (b) (2), “driver’s license numbers,” I am not including my full Driver's License Number. However, in accordance with Rule 138 (c)(2), “A redacted filing of personal identity information for the public record is permissible and shall only include: **the last four digits** of the driver’s license number.” Therefore, I am asking This Notary to use only the last 4 digits.

See: [http://www.IllinoisCourts.gov/supremecourt/rules/art\\_ii/artii.htm](http://www.IllinoisCourts.gov/supremecourt/rules/art_ii/artii.htm)

Notary Public. Heidi Davis  
  
(Notary)

Date: July 5, 2017

My Commission Expires: May 2, 2021





Gordon Watts &lt;gww1210@gmail.com&gt;

---

**Paul, this is Gordon, again... Something odd's happening...**


---

Gww1210@aol.com <Gww1210@aol.com>  
 To: plshelton@sbcglobal.net  
 Cc: Gww1210@aol.com, gww1210@gmail.com

Tue, May 16, 2017 at 10:17 PM

Wow - you have taken quite a bit of time to respond to me in great detail, twice, just now; Thank you, Paul.

I will try and reply to each point in both of your emails in one response, -- and 'interleave' my replies below each of your responses, for clarity --  
 As email is usually done, I will put your more recent response on top, and I'll respond in bold-faced dark green for clarity. (So, that means you'll read it from the bottom up, like usual.) -- see below... [[I will number my points to make it a bit easier.]]

**In a message dated 5/16/2017 7:06:26 A.M. Eastern Daylight Time, plshelton@sbcglobal.net writes:**

Gordon

You need to get past the "forgery". Richard is a liar. He gave what's her name a POA so he could make all these fraud claims. But in reality, he gave her POA and she had right to alter deed, even date, "forge" it or sign properly as attorney in fact. That is the judges point.

[[ #10 ]] **Wow, finally some thoughts or a counter-argument. Thank you, Paul!! While I think I'll respectfully dissent, know this solemn axiom: I don't get smarter by asking views or feedback from people who are 'yes' men/women - and only agree with me!.. Anyhow, I saw the record: While there \*was\* a POA, it obviously wasn't as powerful as you suggest -- otherwise, the title would have transferred on the May 2006 deed, and Younes kicked him out with a 5-day notice back then. Besides, the POA I see in my record <http://gordonwaynewatts.com/MortgageFraudCourtDocs/2007-CH-29738-LAW-DIV-Sept09-2015-Motion-Amicus-Exhibits-GordonWayneWatts.pdf> or <http://gordonwatts.com/MortgageFraudCourtDocs/2007-CH-29738-LAW-DIV-Sept09-2015-Motion-Amicus-Exhibits-GordonWayneWatts.pdf> see "Exhibit Watts-G," was good only until June 30, 2006, when it became irrevocable (and was revoked by the affidavit of forgery put in the recorder's office, remember?), meaning that the July 09, 2006 'signature' -- even if possibly with the POA, before then, wasn't possible afterward, as the POA had expired. (But good argument!)**

Besides, "Exhibit Watts-F," was the same copy, but not notarised, meaning the notary stamp was illegally put on after-the-fact (unless someone had a photocopy machine at that Starbuck's that day, to scan a before & after - not likely). But, unless Rhone testified that she used the POA for that purpose (and she didn't, I don't think), it is clear that fraud occurred.

Note also, it was a 'limited' POA, for a real estate 'transaction,' to an outright quit claim deed transfer - big difference. A transaction is more than merely deeding over the property, and, again, no consideration is an issue, below...

The deed was a valid transfer instrument, in equity. She did what she did with his authority and the title co accepted it. End of story.

[[ #11 ]] **But the lack of consideration was a stumbling-block, as I point out: *Stilk v. Myrick*, 170 Eng. Rep. 1168, 1168 (1809) (L.R.C.P) (Ellenborough, L) (holding a renegotiated contract void due to lack of consideration). Daniggelis wasn't paid, which voids any 'transfer' on that grounds too.**

**Please keep in mind I am not a liar, and I have no reason to lie now.**

**[[#12]] by and large, believe you, Paul - but I still have doubts about Daniggelis' claim that you & your wife testified that she witnessed something he signed, when he says she never met him. And, the fact you have Exhibit-F in my attached brief, here not notarised, but Exhibit G was? How was that possible? Probably, someone notarised this after he signed it - again, not the worst crime (people do it all the time - and Daniggelis DID admit to signing it), but still a fib is a fib, and unnecessarily gives you a bad name if Daniggelis is correct here.**

**And I tried to help Richard. A waste of a lot of time. I feel stupid about it now. He lied to me and was hatching his plan to claim he was wronged. This is a man who inherited the building free and clear,**

**[[#13]] Actually, he says the he bought out his siblings' shares - and, I'm guessing, at a substantial cost. (I think he has no reason to lie about this, but I admit I don't know all the fact - and this point is really unimportant to the criminal aspects.)**

**sold the garage for profit; refinanced multiple times and never made a payment and used the cash out to do who knows what cause the place is a pit. He filed BK many times by himself. Like I say dumb like a fox. He was at the end of the line and the women beguiled him and "convinced" him to sell to an investor, live there 6 months and move. Richard agreed, but hatched his real plan to cry ignorance and nativity and fraud. It's worked. I helped him out and tried to get him to write his book; I spoke to him for hours about his life and plan.**

**[[#14]] He does talk *and talk and talk!*. (And, just between you & me, Richard agrees with me & thinks you are much more honest than Younes, and even told me how you said that you couldn't stand Younes any longer and had to stop being his law partner. Rich thinks and hopes that you will turn state's witness and help us win, which would be appropriate if, in fact, laws were broken.)**

**Even if Rich made stupid financial decisions & bit off more than he could chew, nonetheless, 2 wrongs make not a right, and, while I like the strength of your POA argument above, I think it's clear that Erika Rhone's scheme didn't work, since her POA expired, and was legally revoked. Even if a judge says otherwise, I still am not convinced. (Let's not forget the side-agreements that limited the POA for use of paying arrearages, etc. Since title didn't transfer on the May 2006 Warranty deed, this is proof of the side-contracts existence, which limited this transfer; otherwise, title would have not had to wait til the July 2006 warranty deed!**

**Besides, Paul, even *\*\*if\*\** what you're saying is true about her use of the POA, she would have had to sign her OWN name, and invoke the POA, to make it legal. Otherwise, she was committing a forgery. I'll give you an example: Even IF I hired a security guard, and gave him permission to enter a property I (theoretically) owned, it would be illegal for him to impersonate ME and try to enter it. Rhone, if she was the one forging the signature, is still guilty of forgery. Just remember, a POA does NOT give any person license to break the law, and forgery is still criminally illegal - and has no statutes of limitations. Moreover, there were 'acts of furtherance' committed more recently (Younes' continued attempts to gain property via forged signature, and knowingly dealing in styolen property), which I think will (a) possibly convince the State's attorney supervisor to overrule Asst. State Atty. Thomas Simpson on this point, and (b) convince the IARDC to revoke Younes' law license.**

**Remember, Paul - even if Younes "got away" with this due to statutes of limitations expiring, there was a local teacher in my area who, while unable to be "criminally" prosecuted for making a sexual joke to a student, will probably get fired as a teacher. A lawyer need not break a criminal law to be disbarred - as you found out the hard way. Younes is, in my view, MUCH more guilty than you, and if the IARDC doesn't disbar him SOON!!, I will probably contact John Kass and friends and inform them that the IARDC admits (and/or knows) that criminal acts were committed that were "untouchable" due *\*solely\** to SOL (Stattes of Limitation) issue - and that the IARDC is saying that you can commit a crime and still be an attorney in "Crook County," IL so long as the SOL expire! ... not. SOL also stands for sh-t out of luck, and that is the case, as Younes is obviously much more guilty than you, and will sooner-or-later face even harsher sanctions, if there is a God. - .. - .. There *\*is\** a God.**

He convinced me he would move out and go to his sisters. The place was simply mortgaged out. Check the records. He has you now working for free, all to keep squatting for free.

[[#15]] Ah, "mortgaged out": a term meaning that he To borrow more than is necessary to secure the purchase or improvement of real estate. Yes, but no proof of payment exists, so even so, the 'contract' is not valid: *Stilk v. Myrick*, 170 Eng. Rep. 1168, 1168 (1809) (L.R.C.P) (Ellenborough, L) (holding a renegotiated contract void due to lack of consideration). Daniggelis wasn't paid, which voids any 'transfer' on that grounds too.

But, anyhow, Karen Shanner, formerly with Steward Title, allegedly testified that you & others broke a bunch of broker rules. AND, if you knew the title was transferred on a forged signature & didn't speak up, you were at fault. (But maybe you believed Rhone had POA permission, even tho I know that no POA authorises anyone to break a law, like forgery, etc.)

There is a better client for you. Richard simply is a scammer. He sucked all the equity from the place and his time is up.

[[#16]] OK, even he admits he spent a little bit of it for improvements, and such, but this is de minimus if crimes were committed. Rhone can't simply break a law because of a POA - that is absurd!

I wish you'd move on to someone who deserves your work.

You've convinced yourself Richard is honorable. But he is not.

[[#17]] Well, while Daniggelis is argumentive and talkative, I don't accept your legal analysis. (But am open to being wrong! Remember, I admitted to Judge Otto that I was wrong about teleconferences for people like me in Florida, and that it was only optional, not mandated!)

C'est la vie.

[[#18]] *Such is life: that's how things happen. I wish blessings upon you too, but if you are indeed guilty of lying about witnessing / notarising that Exhibit-G in my PDF attachment, in this email, and/or wrong in your assessment that Rhone could commit a forgery & break the law, you should admit where you're wrong - but only IF you're wrong, and for nothing more. Defend yourself where you're innocent, which is true for the vast majority of the issues.*

Blessings

Paul

Sent from my iPhone

On May 16, 2017, at 3:18 AM, Gww1210@aol.com wrote:

Paul, this is Gordon, again...

**In a message dated 5/16/2017 6:49:24 A.M. Eastern Daylight Time, plshelton@sbcglobal.net writes:**

This is personal and confidential and I'm trusting that none of what I say here is used against me.

[[ #1 ]] While I will admit that I think you and/or your wife may have lied about my friend, Richard Daniggelis (regarding her alleged witness of his signing something), I have absolutely no motive to betray your confidence or otherwise do you harm. (While I'm far from perfect, Paul, please remember that even when I was convinced you were the 'main' bad guy, I was trying to encourage you to hang in there - and also see what solution I could propose that would be fair to all - AND, even now that I'm sure that Joseph Younes **\*\*KNOWINGLY\*\*** took title of a house, when he **\*\*KNEW\*\*** that the transfer was

done using a forged signature (I KNOW he knew, because I notified him, hello!?), and I'm convinced that he's FAAAR more criminally-guilty – and quite evil to boot – nonetheless, even regarding Younes, I don't wish to seek for him to be made homeless or even unemployed (tho some of that may eventually result anyway).

So, what I'm saying is this, Paul – even tho I'm sadly VERY human & make mistakes, if I don't even wish revenge (but merely punishment) on Younes, I certainly don't want to kick \*you\* while you're down, in any way, if I can help it. (I'm guessing you were probably guilty of something small, but were punished far more than you should have been. I say that because I believe Daniggelis has no reason to make up a story and falsely accuse you & your wife of lying on the stand. So, I VERY much believe you & your wife lied about her witnessing his signature, and would like to hear your take on why Daniggelis said this – and come clean, if his accusation is correct – but, even if true, all agreed that Daniggelis signed the POA, and so lying about a notary witnessing it, while wrong & illegal; is a self-inflicted unforced error, and not at all as criminally-illegal or as morally-immoral as what Younes did, in taking a house while knowing it was done on a forged signature – and then bragging to Daniggelis that he was "distanced" or "separated" from the actual crime.

Please come clean on this small point – or else defend yourself in the best way you know how: not only am I curious, but moreover, this will come back to haunt you if you don't address it.

I did nothing wrong as to Richard, deep down Richard knows the truth. I lost time and money on Richard, trying to help him. He fooled me. The real culprit was the African American girl, can't remember her name,

[[ #2 ]] I think it may be Erika Rhone?...

she had POA over Richard, and brought Richard to me. She is dumb like a fox and was very attractive too and used that to manipulated people. Richard was one of many she figured out away to make money upon. I saw closed deals with her where her company netted \$80-100k on flipping to a 700 credit "buyer". She'd buy a two flat in depressed black neighborhood for like \$80k do a quick rehab and "sell" it to someone for \$240k making that nice profit for rehab costs to her company.

I have to think on this, the Larocque issue. He was once my best friend and only supplied the money which is not illegal.

[[ #3 ]] I spoke \*briefly\* by phone with Lou Brydges (by phone - after pestering him a lot via email & phone voice mail messages), and he says the same thing; While I know you don't like him, I'm glad both of you weighed in. Moreover, Robert J. More, the weirdo "vexatious litigant" character who was the infamous unpaying tenant of Daniggelis, is like an idiot savant on case law (but with no common sense), and when I asked him the same question, he said he saw no reason that it would be illegal for Younes to borrow money from LaRocque to do a closing. I think Mr. More's logic is sound, and, except for possible credit-worthiness issues (where some obscure law might require a person to prove their credit or financial mojo is good), I tend to agree. Thanks once again for clarifying what happened – and what is legal here. After I asked him if he remember my Fla Supreme Court filings, Brydges did, however, say he was impressed with my 4-3 loss in the Fla Supreme court in re Terri Schiavo, the famous 'feeding tube' girl, and said, in his view, it was a win, since i came so close to winning against stacked long odds. I sort-or agree.

No reason to take his testimony at all. It was just another investment. He is quite rich so I just think he doesn't want to waste his time.

[[ #4 ]] That sort of makes sense, and thx 4 offering your thoughts. But if Galic keeps seeking to depose him, and LaRocque keeps hiding, this smells, to me, like there's something there. (Why else would Galic pursue, and why else would LaRocque hide? Avoiding wasting time is not motive enough in light of the risk if his ass being arrested, charged, and either fined or locked up - not to mention possibly losing his FINRA credentials.) Something doesn't seem right here, Paul, but I can't put my finger on it, and neither can Daniggelis or More – and Galic is not talking (Lawyer-client privilege, plus he wants to surprise LaRocque, so he's keeping silent & tight-lipped.)

| In reality though, Richard really has no case.

[[ #5 ]] Respectfully, I disagree: While Daniggelis (as a practical matter) may be in over his head in payments, etc., really, Paul, how could the transfer of title be legal in light of the fact that –a–, it's an obvious photocopy (identical signature, plus whiteout), and –b– Daniggelis didn't get paid either (no contract is valid without consideration e.g., payment). Plus, –c– Daniggelis has no motive to just give up the house & land with hundreds of thousands of dollars of equity, which makes the transfer even more criminal, in light of the stolen equity. (And, –d– sources tell me that there was usuary or otherwise illegal interest schemes, not to –e– mention that Linda Green fraud issue.) – really, Paul, how could any transfer of title be legal like that? If you're saying \*this\* is legal, then –f– (since a-e add up) I'll just go and forge a signature and take whatever I want!.. Oh, really?... .. —NOT.

| Certainly you can create one but I know the truth. Richard is dumb like a fox too.

[[ #6 ]] Yes, and even Rich admits he over-extended himself in trying t buy or otherwise build 2 houses, but 2 wrongs make not a right, and nothing can legally justify what happened to Rich. ONLY if he did a quit claim or something (which he didn't do) would it even be \*possible\* to consider condoning or otherwise supporting such an (otherwise illegal) transfer.

| She was just "dumber".

[[ #7 ]] Well, if she did the forgery, then yes – what comes around, goes around: "KARMA" is the eastern way of saying the Godly law of Sowing & reaping is true!... She'll get hers is she did the forgery -- or knew about it and was silent - or both.

| He should eventually give up the house. He is still squatting, little birds tell me.

[[ #8 ]] Well, the house has NO roof, and is being rained on – but (spiritually-speaking, anyhow), yes, he's squatting.

| Good luck but please leave me alone if possible.

[[ #9 ]] Well, I believe you will eventually be summoned to testify – I can't guarantee it (and have no power and no much more influence, here), but if (as I am guessing) you're only guilty of lying about the notary witnessing Daniggelis signing a POA, my guess is you should come clean, which would gain you credibility, and then it would (greatly, I'm guessing) lessen the probability of you getting charged with doing and/or covering up the forgery. What? Sent from an iPhone? That nutty Robert J. more character just bought me an Android cell phone, and I'm discovering just how hard it is to type in on such a small keypad – I am amazed that ANYONE uses those things! And I only use it via WiFi (on my own modem or uptown with others' Wifi), as a 'plan' costs WAAAYY too much money. My own cell phone (863-409-2109) is a prepaid welfare phone – since the economy is so bad that even us right-wing Conservatives are lining up for social programs. My home phone, 863-688-9880, is much more "normal," altho it doesn't text or anything.

But, anyhow, if you're (almost 100%) innocent, you have nothing to lose and much to gain by following my example of speaking up about wrongs. You want to do that as a 'national' or whatever, right? Why not do so where it can make a difference. Capt. James T. Kirk, in *Star Trek: Generations* (a movie) told Capt. Jean-Luc Picard that ONLY when he was in the captain's seat could he make a difference – I'm \*old\* (just turned 51!), and you're what? Even older? We won't be here forever, Paul – only while we're in the 'Captain's Chair' can we make a difference – observe:

Star Trek: Generations (1994)



## Quotes

Showing all 38 items

**Kirk:** Captain of the Enterprise, huh?

**Picard:** That's right.

**Kirk:** Close to retirement?

**Picard:** I'm not planning on it.

**Kirk:** Well let me tell you something. Don't! Don't let them promote you. Don't let them transfer you. Don't let them do \*anything\* that takes you off the bridge of that ship, because while you're there... you can make a difference.

**Picard:** Come back with me. Help me stop Soran. Help make a difference again!

**Kirk:** Who am I to argue with the captain of the Enterprise? What's the name of that planet? Veridian III?

**Picard:** That's right.

**Kirk:** I take it the odds are against us and the situation is grim?

**Picard:** You could say that.

**Kirk:** You know if Spock were here, he'd say I was an irrational, illogical human being for going on a mission like that.

[pause]

**Kirk:** Sounds like fun!

14 of 14 found this interesting | Share this

source: <http://www.imdb.com/title/tt0111280/quotes>

Blessings brother

Paul

Sent from my iPhone

**On Tuesday, May 16, 2017, at 3:18 AM, Gww1210@aol.com wrote:**

Paul, this is Gordon, again... Something odd's happening, & I wanted to pick your brain, ok?

*GMAC v Younes, Daniggelis, Shelton, et al*, 2007-CH-29738 <https://w3.courtlink.lexisnexis.com/cookcounty/Finddock.asp?DocketKey=CAAH0CH0CJHDI0CH> was transferred out of Chancery and into the Law Division, [https://w3.courtlink.lexisnexis.com/cookcounty/FindDock.asp?NCase=&SearchType=2&Database=2&case\\_no=&PLtype=2&sname=daniggelis&CDate=](https://w3.courtlink.lexisnexis.com/cookcounty/FindDock.asp?NCase=&SearchType=2&Database=2&case_no=&PLtype=2&sname=daniggelis&CDate=) and under the same case number to boot. In case you haven't noticed, Andjelko Galic, Daniggelis' attorney, keeps deposing John LaRocque, and LaRocque keeps evading

deposition! Obviously, he must feel he has something to hide. Judge Sanjay Tailor was threatening to dismiss the case if Galic couldn't get LaRocque into deposition - but a few things seem odd:

- 1) Why does Galic want to question him? To see who committed the obvious forgery, maybe? (The signatures on the two warranty deeds is IDENTICAL, as you well recall - and there's whiteout on the latter one, which was used to transfer title, after the 1st deal fell through, due to unpleasant side-agreements Daniggelis put in place.)
- 2) Why would LaRocque be afraid to testify? (Maybe Galic has some documentation to pin him down to testify on some point?..)
- 3) Judge Tailor is said to have suggested Galic not merely 'depose' LaRocque, but rather, issue a subpoena, something that (according to Daniggelis) he did not do. Why would he be afraid to issue a subpoena? (And, what's the difference in deposing him and issuing a subpoena, or maybe I'll ask Google that one!)
- 4) Lastly, Daniggelis thinks that maybe Joseph Younes, who eventually got title to the house (see my news item, below), was supposed to bring his own money to the closing, and didn't and that this broke some law. Could that be the reason Galic wants to depose LaRocque? My sources tell me that it's not illegal to go to a closing using someone else's money, and that it's merely borrowing it.

What are your thoughts on 1-4, here? Thanks!

Gordon Wayne Watts in Florida

*begin- copy/paste of news item:*

(Fri. 14 Apr. 2017; UPDATED Sat. 29 Apr. 2017, from Staff Reports; NEWS) Courts \* *Chicago Courts refuse to stop illegal construction/demolition: "Mortgage Rescue Scam" victim's house almost destroyed* \* UPDATE: As previously reported by *DNAinfo* ("*Rotted' Historic Building In Old Town Triangle Could Be Seized By City,*" by *Ted Cox*, *DNAinfo*, *March 30, 2017* COMMENTS; and: "*Rotted' Old Town Triangle House Owner Faces Daily \$1K Fine As Charges Fly,*" by *Ted Cox*, *DNAinfo*, *April 07, 2017* COMMENTS; and: "*Rotted' Old Town House Slated For Repairs As Fines Threatened Again,*" by *Ted Cox*, *DNAinfo*, *April 28, 2017* COMMENTS), the house which was featured in our previous Tue. 01 Dec. 2015 story, linked here was almost destroyed, even in spite of repeated warnings to The Court's Chancery, Civil, and Law Divisions This story is developing; keep posted for updates. *The Register's* open-source docket, is accessible here with most or all key filings. [Perma-link to this story: [click here](#)]

*--end copy/paste of same.*

Gordon Wayne Watts, *editor-in-chief, The Register*

**In a message dated 4/18/2017 12:26:13 A.M. Eastern Daylight Time  
Gww1210@aol.com writes:**

Long time no see, Paul. Sadly, the only person that pays me for my hard work, here, is the Lord God, himself... (of course, through intermediaries, like family), but even my friends (who benefit) almost never repay or compensate me. I'm not even sure what an American National is, but I'm guessing it is like a Patriot, like when I used to have time to stand by the roadside (e.g., the Interstate Overpasses, which is where it got its name) with signs for the Overpasses for

America movement (which used to be called Overpasses for the Impeachment of Obama).

I personally know James Neighbors, the national founder for Overpasses, and Dallas Thurman, who is lieutenant; they're both on my Facebook. While they're generally conservative, they are also against corporate welfare and "Crony" capitalism, so it is more populist or libertarian in nature, I'd say. You know, it would help if you could volunteer some information about who executed the forgery. While there \*might\* be some short-term "legal pain," long-term, it would be the best investment. My guess is that you're \*much\* more honest than Younes, which is clear because he is unnecessarily rude (telling me to not call him back, when I called once a long time ago to apologize for not filing something informative & helpful sooner). But, no disrespect meant, when Daniggelis tells me you & your wife lied about a notary being present when he signed something (not sure why anyone would want to lie about that, as he freely admits that he signed it), I believe him, and I wonder why he would say that. He has said that you told him that Younes disgusted you or words to that effect, and that Younes was getting to be too evil "even for you" I thin were his exact (or similar) words. This suggests that Daniggelis thinks you're dishonest, but less than Younes.

I feel bad that there is the chance that you did something wrong (possibly Daniggelis was right about his claims you & your wife lied - I don't know, and must give both sides the benefit of the doubt, as a misunderstanding could have occurred, making both of you honest). But anyhow, no one I've ever spoken with (and no one I've ever "dealt with" - excepting the bad judge Otto character) disputed my assessment that the 2nd warranty deed was forged via a photocopy. Even Otto didn't outright dispute it, but rather made light of it in his ruling, suggesting that even if his court had jurisdiction on the merits (it was on appeal, then), that this new finding would not have made any difference. I'm calling bullshit on his claim, as it was pure B.S. His order, of course, is on my online docket, if you want to read it.

So, don't you think that it's pretty-much certain that the 2nd warranty deed used a photocopied signature of the 1st one? And, what should (or can) be done about that, now? What do you think about these tough questions? (Well, the 1st one wasn't tough: Easy for even a blind man to see it was forged, but the ramifications of the court system's refusal to fix it are a "tough" pill to swallow.) But anyhow, what you think of it? And, what are you doing now days?

Thanks,

Gordon W. Watts

**In a message dated 4/17/2017 8:05:13 P.M. Eastern Daylight Time,  
plshelton@sbcglobal.net writes:**

Gordan:

Interesting...do you make a living filing this stuff? Just wonerimg..

Are you familiar with how to become an American national?

Thanks



Paul L. Shelton

On Monday, April 17, 2017 7:15 AM, "Gww1210@aol.com"  
<Gww1210@aol.com> wrote:

Counsel,

I have filed an amicus curiae brief, with requisite motion. It is attached.

Let me remind everyone that there is a hearing in Room 1912, before Hon. Diane M. Shelley, Circuit Judge, Law Division, in this case, at 9:00am CST, today (Monday, 17 April 2017).

My brief has seven exhibits (up to Exhibit-G), but I am hesitant to include these in the email attachments (tho I may try after I electronically serve this brief), because the attachments are close to 20MB, and that might be a little large for some email servers.

You can pick up your copies of the exhibits here:  
[www.GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html](http://www.GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html)  
or here:  
[www.GordonWayneWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html](http://www.GordonWayneWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html)

The docket entry is dated "\*04/17/2017," and is pretty close to the bottom of the page. Or, you could wait for the hard copies, which I am working on sending right now. Should you lose these links, above, my docket of selected items is still linked through the front-page news item in question, on *The Register*, my namesake blogs.

Best,

Gordon Wayne Watts, *editor-in-chief, The Register*  
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Truth is the strongest, most stable force in the Universe

Truth doesn't change because you disbelieve it


TRUTH doesn't care of the will to believe it

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Get Truth

"First, they [Nazis] came for the Jews. I was silent. I was not a Jew. Then they came for the Communists. I was silent. I was not a Communist. Then they came for the trade unionists. I was silent. I was not a trade unionist. Then they came for me. There was no one left to speak for me."(Martin Niemöller, given credit for a quotation in The Harper Religious and Inspirational Quotation Companion, ed. Margaret Pepper(New York: Harper &Row, 1989), 429 -as cited on page 44, note 17,of Religious Cleansing in the American Republic, by Keith A. Fornier, Copyright 1993, by Liberty, Life, and Family Publications. Some versions have Mr. Niemöller saying: "Then they came for the Catholics, and I didn't speak up, because I was a Protestant"; other versions have him saying that they came for Socialists, Industrialists, schools, the press, and/or the Church; however, it's certain he DID say SOMETHING like this. Actually, they may not have come for the Jews first, as it's more likely they came for the prisoners, mentally handicapped, & other so-called "inferiors" first -as historians tell us-so they could get "practiced up"; however, they did come for them -due to the silence of their neighbors -and due in part to their own silence. So: "Speak up now or forever hold your peace!"-GWW//

11

 2007-C~2.PDF  
948K



Gordon Watts &lt;gww1210@gmail.com&gt;

---

**Paul, this is Gordon, again... Something odd's happening...**


---

Gww1210@aol.com &lt;Gww1210@aol.com&gt;

Wed, May 17, 2017 at 7:00 AM

To: plshelton@sbcglobal.net

Cc: Gww1210@aol.com, gww1210@gmail.com

Ah, that's the difference between a mere notice of deposition and an official & binding subpoena. Thank you for your detailed analysis, Paul. While your analysis seems foreign to me (and frankly a surprise that I wasn't expecting!), I must assume both possibilities could be true, and look at them for plausibility:

First off, while schemers & scoundrels do exist, I don't think it likely that Daniggelis would risk outright losing the house without any documented payment (other than a few home-improvement loans) for the chance to "get it for free," something I think he would view as unlikely. So, while - theoretically - your analysis is possible, I think it improbably or unlikely. Schemers, who try to steal elderly peoples' houses (those who are seeking refinancing, investors, etc.), also exist, and I think this possibility is more likely/probably. That's just my take, but thank you for the positive feedback on both my legal arguments and your well-wishes for me & my endeavors.

Actually, I \*didn't\* know the distinction between the notice and the actual subpoena, but then again, I'm not a lawyer (and barely even a legend in my own mind anymore!).

Now, if Rich were dishonest, as you suppose, why would he repeatedly adjure me to be respectful to my mother, listen to me & give me feedback when I want his opinion (like you're being kind enough to do), to listen to his (sometimes longwinded) analyses, and fight so hard for his house, with the aim of doing justice. A wronged person fights much harder. And, remember, he credits you for being much more honest than Younes, which, I think, he would not do were he dishonest. And, while he is as angry as hell (or putting on a good show!), he insists that he does not want to do Younes and great harm more-than-necessary to get his house back.

He insists that vindictive and petty vengeance is not morally right, and insists that he believes God will use this matter to show how both courts and "the average Joe" are all dishonest and corrupt, and that we need Jesus to help us be honest and follow god's ways; he has repeatedly said this, and as a man thinketh in his heart, so he does and speaks, and this suggests that you're reading him wrongly. **Also, it was \*your\* notary seal on the POA, which magically appeared on it after it was signed, scanned, & entered into the court record, suggesting it was probably signed after-the-fact – unless you carried a portable scanner with you when you presented it to him to sign, but I think this highly unlikely, and moreover, why would you scan in a signed, but not notarized, copy – and then notarize it and scan in a 2nd image? That makes no sense to me, and I'm sure you notarized it after the fact, getting the document from Erika, the black girl, who I thinm met him at a local Starbucks.**

Since you haven't refuted my belief that you probably did notarize it after the fact (and didn't witness it), I believe you were guilty on this point. Either you were guilty of notary without witnessing or not – but either way, I don't want to bury you or kick you while you're down. **I know it can be hard & risky to address this, but whether you're guilty of the notarizing the POA after-the-fact (and without seeing him sign it) or not, you should address the matter truthfully, and quickly.** Get it out of the way. (Also, Daniggelis used you let poor people stay in his house's 1st floor, i hear from multiple sources, and I think he's more honest than you see, so please be open to that possibility.)

While I don't fully agree with you, thank you for trying to help me. Nonetheless, King Saul, ISRAEL'S first king, was guilty of offering sacrifices, and not obedience, as the books of Samuel in the Old Testament Bible recount. Please don't let that happen to you – it's good that you care about others' welfare (such as me) and try to clarify tough legal knots, but please also protect and defend yourself. You can be of NO use as an "American National," whatever that is, if you let your name/reputation be marred by the "notary without witnessing" allegation (whether

7/5/2017

Gmail - Paul, this is Gordon, again... Something odd's happening...

true or not), and this all will prevent you from fighting for truly just causes (which I still think applies to Richard Daniggelis' case, notwithstanding your views). Even if Rich is dishonest, 2 wrongs make not a right, and we must fight the greater evils, and deal with Rich later. We must fight our own battles of honour and justice - and not be distracted by other things.

Gordon

In a message dated 5/16/2017 11:14:43 P.M. Eastern Daylight Time, plshelton@sbcglobal.net writes:

Gordan:

My main point about the Deed is that Richard sent the woman to the closing, with the knowledge and expectation that the property was being sold to Younes. So, in equity, he expected and authorized the transaction.

But, Richard is a liar and a scammer. He acted exactly as expected, and claimed the house was stolen from him, he never aithorized transfer, the deed was a forgery, etc.

Bottom line, Kharma is a bitch. What was expected to happen did finally happen. He continues to squat, pushing his lie and scam. A scorpion can still sting, even after the head is cut off. he was at the end of the line with refinancing, another bank was after the house in foreclsoure and he is very clever. You as a legal consultant (and a good lawyer too) can always make an argument for this guy...many scammers and liars have a legal argument...but the story is what it is...he is writhing and fighting as best he can.

Its not a complete anaology, but makes the case: the guy who murders someone, but gets away with it due to a legal technicality...he still did the act...

Richard is dumb like a fox...Hell he has gotten you to waste a lot of time an energy, when that time could have been spent on many others who really deserve it...

Alot of your legal arguments are very valid...but you are fighting for a liar and scammer. I firmly believe that. Your resources are being wasted in the eyes of God.

As for the subpoena versus Notice, the Notice of Dep was issued and I assume LaRocque agreed to appear; that's a much more agreeable situation...once the Judge allows you to issue a Subpoena for Dep it is a required appearance when served, at a set date and place, and the deponent can be held in contempt for not appearing...Not sure what the lawyer's thinking is...But you probably knew all that...

Blessings brother

Paul

[Quoted text hidden]



Gordon Watts &lt;gww1210@gmail.com&gt;

---

**Paul, this is Gordon, again... Something odd's happening...**


---

**Gww1210@aol.com** <Gww1210@aol.com>  
 To: plshelton@sbcglobal.net  
 Cc: Gww1210@aol.com, gww1210@gmail.com

Thu, May 18, 2017 at 6:56 AM

Paul:

**You said something that had me confused earlier:** [""But in reality, he gave her POA and she had right to alter deed, even date, "forge" it or sign properly as attorney in fact. That is the judges point.""]

**First off, I looked at the POA Richard signed, and it was a 'Limited' POA, limited solely to a sale (not a quit claim deed, or giving away the property for Free without consideration eg payment).**

**But even aside from that, you were WRONG in your claims that Erika Rhone could forge someone's signature using a POA as authorisation – PROOF:**

"When signing contracts on behalf of your principal, **sign your own name**. After signing your name, print your name then, "As POA for" or "As Agent for" followed by the name of your principal." <http://legalbeagle.com/5154849-sign-power-attorney.html>

"There are some legal regulations and some institutional rules about the "proper" form of signature for an agent empowered by a durable power of attorney. But the overriding legal control is that you must make clear that you are one person who is empowered to sign on behalf of another""**as opposed to attempting to forge the signature as wholly your own**. The American Bar Association sanctions two ways that an agent can sign. If you are Jane Doe empowered as the agent for Dorothy Doe, for example, you could sign either as: "Dorothy Doe, by Jane Doe under Power of Attorney" or "Jane Doe, attorney-in-fact for Dorothy Doe." Either should pass legal muster for some situations." <https://www.caring.com/questions/how-to-sign-documents-as-power-of-attorney>

"How to Sign as Power of Attorney

When you sign a document as someone's attorney-in-fact, your signature needs to make it clear that you—not they—are signing the document and that you are acting under the authority of a power of attorney." <https://www.legalzoom.com/articles/how-to-sign-a-power-of-attorney-document-for-someone>

"When signing on behalf of a Grantor as Attorney-in-Fact, you should always sign YOUR OWN NAME, followed by the words "Power of Attorney".

**Do NOT sign the Grantor's name — EVER!**

By signing your own name with the words "Power of Attorney" after your name to any contract or other legal document, the person receiving the documents signed by you on behalf of the person who granted you the Power of Attorney understands exactly what is being provided." <http://www.standardlegal.com/blog/if-i-have-power-of-attorney-how-do-i-sign-legal-documents-on-behalf-of-my-grantor>

**\*\* See also pages 13-14 of this 90-page PDF, where Lisa Vitek notarised the July 09, 2006 Warranty Deed that you say Erike Rhone was able to forge. Since you were the one who prepared this document, you are involved somehow. But Ms. Vitek did not notarize it properly (see below), and it**

7/5/2017

Gmail - Paul, this is Gordon, again... Something odd's happening...

was not even signed correctly (see above).

## "How do I notarize the signature of someone acting as an attorney in fact?"

An attorney in fact typically signs a document with two names: the attorney in fact's own name and the name of the principal. For example, if John Doe is acting as attorney in fact for Mary Sue, he could sign like this:

"John Doe, attorney in fact for Mary Sue, principal"

Or,

"Mary Sue, by John Doe, attorney in fact"

In this case, John Doe is the person appearing before you and signing the document, but doing so on behalf of Mary Sue. Because John Doe is the only person who is physically present and signing, you would write John Doe's name as the signer in the appropriate parts of the certificate wording (for example, "... personally appeared before me **John Doe**, who acknowledged ..."). "

"" <https://www.nationalnotary.org/notary-bulletin/blog/2015/09/how-to-handle-notarization-attorney-in-fact>

**All this suggests that you could be vulnerable to criminal charges. While I disagree with you on some points, I don't think you're as guilty as what you were portrayed, but when you ignore my suggestion to come clean where I feel you were guilty of small issues (notarising something after the fact), you are shooting yourself in the foot, and reducing the chances you'll get a fair shake. Illinois is corrupt, but not as bad as Florida - my home state - trust me! Take heart and have hope - and do the right thing, whatever it may be.**

**Gordon**

[Quoted text hidden]



14m1701473-07242015.pdf

2370K

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.  
aka: "LaSalle Bank National Association," aka "US Bank,  
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,  
Plaintiff,

vs.

Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,  
Defendants, and

Gordon Wayne Watts,  
Proposed Intervening Defendant.

) Case No.: 2007 CH 29738

) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge

) Case Type: CONTRACT

) District: First Municipal

) Calendar "W", Courtroom 1912

) **TIME-SENSITIVE:** to be heard,  
) in Court Room: 1912, by 07/10/2017

) Court Time: 10:30am (CST)

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 attached "MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS," being filed instanter, in the above-captioned case—a copy of which is attached hereto and is being served upon you.

Due to unfamiliarity with this very uncommon "local rule," movant did not give proper "notice" of past motions, via the "notice of motion," in accordance with said local rule, which is peculiar to this court alone. As This Court can see, the attached Motion to Intervene gives overwhelming evidence of Movant's right to claim legal standing to intervene – and that the interests not being represented are **\*\*not\*\*** "*de minimus*," (unless the court and parties are willing/able to reimburse to Mr. Watts the **full** amount documented herewith, and *then* some for unrecorded costs, time lost from work, and emotional losses).

**Moreover:** The undersigned Intervenor, Gordon Wayne Watts, through human fault, committed three (3) *unintentional* offenses against This Court (and all parties), and, by virtue of this pleading, is offering a sincere apology:

(1) While the undersigned litigant has generally had excellent and professional relations with the many clerks and lawyers involved (*in Chancery, Civil, and Law Divisions, as well as numerous judges' chambers and the chambers of the Chief Judge, as well as the Office of the State Attorney, and the IL Attorney General*), on rare occasion he has expressed human emotion to certain unnamed clerk(s), expressing **profound** disappointment over the rulings in the various cases regarding defendant, Daniggelis. While this is inexcusable and indefensible, Intervenor, Watts, views Daniggelis as sort-of a grandfather-figure (*whom he feels was cheated out of a house, property, and hundreds of thousands of dollars of equity therewith*), and, all of us being human can understand that if you kick a dog repeatedly (Mr. Watts is comparing *himself* to a dog), the dog will eventually yelp or holler. This does **not** justify the yelping bark, but it is offered up as "mitigating circumstances." **Therefore, Mr. Watts offers his sincere apologies for occasional lapses in professionalism.**

(2) Although Mr. Watts' legal standing to Intervene is very strong (see above—and the attached motion to intervene), he felt an "amicus" brief would be less invasive and more acceptable. While this may be the view of *most* courts, nonetheless, for reasons unknown, case law suggests that Cook County, IL courts take a much dimmer view of *amicus curiae* briefs than they do of, say, Intervention actions. **Therefore, Mr. Watts offers his sincere apologies for taking an unintentionally-offensive legal tact, and is hereby changing course to a more accepted and conventional course: that of direct intervention, as provided by statutory and case law.**

2017 JUL 10 AM 10:55  
FILED-13  
CIRCUIT COURT OF COOK COUNTY, ILLINOIS

(3) As mentioned in the instant “Notice of Motion,” Intervenor, Watts, was unfamiliar with this uncommon rule (Local Rule 2.1, requiring a “notice of motion” to accompany motions) which appears unique to Cook County, IL courts—and therefore didn't comply with the rules of the court. **Therefore, pursuant to R.2.1, proper notice is being given of the above-mentioned motion—and an apology herewith is tendered to the court and parties.**

**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 propria 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 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-A). 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-A)**

(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 material, 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-B) 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. 11<sup>th</sup> 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-B)

**(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.)**

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 ruling<sup>1</sup>, 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.**

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<sup>1</sup> *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. Thus judge's statement/claims was false, and slanderous, but we're all human, and make mistakes—and this argument & documentation of slander/libel is **\*\*not\*\*** meant as disrespectful of the judge or the court.*

**Prayer(s) for Relief:** Therefore, please review and rule on my motion for intervention, filed *instanter*, granting speedy relief to effect justice for both Defendant, Mr. Daniggelis, as well as Intervenor, Mr. Watts.

Arguments defending this position are on docket, as This Court has been good enough to grant extensive **Procedural Due Process** and document (by docketing) the sworn affidavit and arguments of the undersigned Intervenor—in prior filings he has submitted within the last several years to the Chancery, Civil, and Law Divisions of the Cook County, IL circuit/trial courts.

While a “CASE SET ON TRIAL CALL” [whether “bench trial” or a “trial by jury”] might theoretically grant justice, this is passing the buck; **and**, as The Court created this problem (by transferring title without legal justification—a brute show of force, and no more), therefore the court, which created the problem should decline to “pass the buck” to a “trial call,” and, instead, solve that problem which it, *itself*, created. Now, I pray This Court speedily grant speedy **Substantive Due Process** on any & all claims of Redress which I've previously made—and which were made by Defendant, Mr. Richard B. Daniggelis.

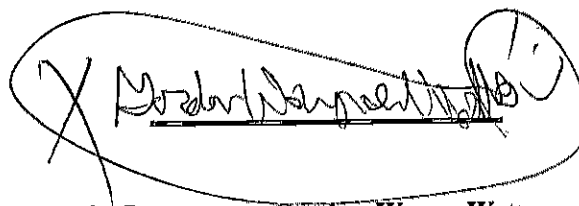
I realise that I'm effectively asking for a “Summary Judgment,” which is addressed and circumscribed by Local Rule 2.1(f) (“Filing motions for summary judgment in the Law Division”). This sub-section states *en toto*: “All motions for summary judgement shall be filed and duly noticed for hearing such that the motion comes before the court for initial presentation and entry of a briefing schedule not later than forty-five (45) days before the trial date, ***except by prior leave of court and for good cause shown*** or unless a deadline for dispositive motions is otherwise specified in the case management order.” [Emphasis added for clarity; not in original]

**Here is 'Good Cause':** Since the nature and magnitude of the injustices are egregious, and since the court and parties have all had very ample opportunities to hash out their arguments, it would prejudice no one should the court issue an order of show cause to Mr. Younes as to why title should not transfer back to its rightful owner—or (simpler & better yet), should the court issue a summary judgment as a matter of law—in favour of Daniggelis. **To decline to issue a summary judgment would fulfill the prophecy: “Justice delayed = Justice denied.”**

**Specifically,** This Court is asked to return title of 1720 N. Sedgwick St. to its rightful owner, Richard B. Daniggelis (and award damages as it sees fit for his numerous losses—not the least of which is the fact that he's losing huge amounts of monies paid out-of-pocket for storage of his belongings, as well, possibly, as rent to procure a replacement housing—so that he does not have to live on the streets or in his van—as was reported widely, in the recent past), unless The Court can offer an excellent, detailed, and coherent explanation to the contrary. [Note: While Judge Otto made valiant efforts to argue against justice here, none of his legal arguments were sound or persuasive, excepting the one pointing out that the trial courts had temporarily lost jurisdiction when the matter was on appeal. The mandate has issued, and that appeal is finalised, so no longer will that dog hunt: The trial court is responsible for cleaning up it own messes.] **Respectfully: If This Court disagrees with the legal arguments herewith, I hereby move The Court – and all of its judges – to grant a motion for clarification to the contrary. Barring that, relief is sought as previously requested.**

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**

A handwritten signature in black ink, enclosed in a hand-drawn oval. The signature is written in a cursive style and appears to read "Gordon Wayne Watts".

**Page 4 of 6, Notice of Motion, by Intervenor, Gordon Wayne Watts**

**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:

**LAW DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 801  
Law@CookCountyCourt.com ; (312) 603-6930 ; (312) 603-5426  
Chicago, IL 60602 – , Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

**Hon. Diane M. Shelley, Circuit Judge, Law Division:**

[Note: I may, for the convenience of the new judge, who replaces Judge Sanjay T. Tailor, include a few hard copies of old filings, but shall not serve them upon other parties, as I've already served them properly.] ;

[ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov)

(312) 603-5940, (312) 603Diane.Shelley@CookCountyIL.gov-7551, (312) 603-4811

Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602

**Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)**

(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)

Email: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) ; [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com)

134 N. LaSalle St., STE 1040, CHICAGO IL, 60602

(Note: The Nov. 16, 2015 proposed order by Mr. Galic in the Law Division case by the same case number suggests that STE 1810 is a old address and that he is now in STE 1040.)

**Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl. Assn.), Email: [RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net)**

221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

**Mr. Robert J. More ([Anselm45@Gmail.com](mailto:Anselm45@Gmail.com))** I represent to the court that Mr. More has consented to email service and prefers this method exclusively.

**Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)**

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221

<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com)

or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

(Note: Mr. King has informed me that the Wacker Drive address is outdated and that this address is the current service address, and his law office website, listed above, confirms this is correct.) I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods.

**Paul L. Shelton, Esq.**

E-mail: [PMSA136@aol.com](mailto:PMSA136@aol.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) As the court has seen fit to deem Shelton a non-party and not in need of service (see comments in the orders in question, and the service list of same), I'm not serving Mr. Shelton a hard copy, just electronic copies.

\* **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](mailto: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**

**MERS (Mortgage Electronic Registration Systems, Inc.)**

<https://www.mersinc.org/about-us/about-us>

a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: [JanisS@mersinc.org](mailto:JanisS@mersinc.org)

Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email:

[SandraT@mersinc.org](mailto:SandraT@mersinc.org) – Director, Corporate Communications

Note: MERS is only being served electronically per above.

**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. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

- E-mail: I am contemporaneously serving all the parties listed above via email, in such cases as I have their e-mail address.

- 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: Thurs 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](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)

Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**Date: Thursday, 06 July 2017**

## INDEX TO THE EXHIBITS

### Instrument

### Docket/Tab#

Case law citations to the “Terri Schiavo”  
(aka: the Florida ‘feeding tube girl’) case

Exhibit-A

Court ruling & docketing information in the recent  
“Gay Marriage” case, heard before the U.S. 11<sup>th</sup> Circuit  
FEDERAL Court of Appeals, in Atlanta, Georgia

Exhibit-B

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)

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

Exhibit-A

\* *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, ETAL. 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 (11<sup>th</sup> 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>

Court ruling & docketing information in the recent "Gay Marriage" case, heard before  
the U.S. 11<sup>th</sup> Circuit FEDERAL Court of Appeals, in Atlanta, Georgia Exhibit-B (1<sup>st</sup> 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: 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



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

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

ELBERT PARR TUTTLE COURT OF APPEALS BUILDING  
56 Forsyth Street, N.W.  
Atlanta, Georgia 30303

John Ley  
Clerk of Court

For rules and forms visit  
[www.call.uscourts.gov](http://www.call.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/rvg  
Phone #: (404) 335-6169

MOT-2 Notice of Court Action

**FedEx package refused by Atty. Joseph Younes** **Exhibit-C**  
**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:**

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

**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:**

<b>Tracking number:</b>	7862-7122-6226	<b>Ship date:</b>	Apr 18, 2017
		<b>Weight:</b>	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.

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: TrackingUpdates@fedex.com

Reply To: trackingmail@fedex.com

To: jaywww1210@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.

FedEx package refused by Atty. Joseph Younes

Exhibit-C

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

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

FROM: Gordon waits 10037 888  
 1001 ALICIA RD  
 LAKELAND FL 33801  
 US

TO: Joseph Younes/599467626  
 5-5716, per website

DATE: 04/21/17  
 TIME: 2:18

308-312-3203-2222  
 0-6666

4-21-17

STATION  
 1006  
 110

MGMT. APPROVAL SIGNATURE

RETURN STATE  
 TO FL

RETURN ZIP  
 TO 33807

Return Label Here

**FedEx RETURN TO SHIP**  
 Ground

Dear Customer - This package is being ret.

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-608 & SF-136 to all Hazmats.  
 Other:

Package received on trailer from shipper:


Crushed  Wet  Oversize  
 Open  Inadequate Packaging  Overweight

7862 7122 6226

4-21-17


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  
 Email is (or was?) Roloe69

498119121 73709085 8893843 1



220-1580

60602-2011-99

JOSEPH YOUNES LAW OFFICES  
 166 W WASHINGTON ST  
 CHICAGO, IL 60602

SMBAG LABEL REV 03/10 - RUN 1/2017

FACILITY:

NLP:

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.  
aka: "LaSalle Bank National Association," aka "US Bank,  
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,  
**Plaintiff,**

vs.

Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, *et al.*,  
**Defendants, and:**

Gordon Wayne Watts,  
**Proposed Intervening Defendant.**

) **Case No.: 2007 CH 29738**

) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge

) Case Type: CONTRACT  
) District: First Municipal

) Calendar "W", Courtroom 1912

) **TIME-SENSITIVE:** to be heard  
) in Court Room: 1912, by 07/10/2017

) Court Time: 10:30am (CST)

FILED-13  
2017 JUL 7 11:55  
CIRCUIT COURT  
COOK COUNTY  
ILLINOIS

**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 *Amicus* brief (containing exhibits & additional facts of interest regarding defendant Younes' behaviour and actions) which proposed Intervenor, Watts, filed with this Court on 04/17/2017, was timely docketed on 04/21/2017, and properly acknowledged as a *pro se* filing by the undersigned *Intervenor*.

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, on occasion, allowed to speak in court, in order that he might get Due Process for his mistreatment. The undersigned Intervenor is in communication with Daniggelis, and he asserts that Daniggelis informed Watts that he (Daniggelis) desires to communicate with the court, but is unable (because he lacks the legal know-how to do so), and his attorney is not at all helpful in this regard.

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: Although courts evaluating timeliness consider "the totality of the circumstances," *United States v. Alcan Aluminum, Inc.*, 25 F.3d 1174, 1181 (3d Cir. 1994), "[p]rejudice is the heart of the timeliness requirement," *Jones v. Caddo Parish Sch. Bd.*, 735 F.2d 923, 946 (5<sup>th</sup> Cir. 1984) (*en*

*banc*). Indeed, “courts are in general agreement that an intervention of right under Rule 24(a) must be granted unless the petition to intervene would work a hardship on one of the original parties.” *McDonald v. E.J. Lavino Co.*, 430 F.2d 1065, 1073 (5th Cir. 1970) (citation omitted). Since the court—and all parties—have long known the legal arguments and views of Intervenor (altho he merely asserted such arguments in *amici curiae* briefs—which this court is not required to grant), no party is prejudiced or caught off guard.

### 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 (1<sup>st</sup> 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.

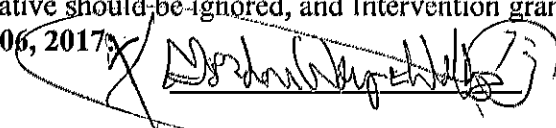
***Here are the details of the work done, as shown in the Exhibits:***

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 (1<sup>st</sup> 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.

Respectfully submitted 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 “Motion to Intervene,” and its exhibits were delivered to the following parties as indicated – this Thursday, the 6th day of July, 2017:

LAW DIVISION: Richard J. Daley Center, 50 West Washington St., Room 801  
Law@CookCountyCourt.com ; (312) 603-6930 ; (312) 603-5426  
Chicago, IL 60602 – , Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays



**Hon. Diane M. Shelley, Circuit Judge, Law Division:**

[Note: I may, for the convenience of the new judge, who replaces Judge Sanjay T. Tailor, include a few hard copies of old filings, but shall not serve them upon other parties, as I've already served them properly.] ;  
ccc.LawCalendarW@CookcountyIL.gov  
(312) 603-5940, (312) 603Diane.Shelley@CookCountyIL.gov-7551, (312) 603-4811  
Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602

**Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)**

(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)

Email: AndjelkoGalic@Hotmail.com ; AGForeclosureDefense@Gmail.com

134 N. LaSalle St., STE 1040, CHICAGO IL, 60602

(Note: The Nov. 16, 2015 proposed order by Mr. Galic in the Law Division case by the same case number suggests that STE 1810 is a old address and that he is now in STE 1040.)

**Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl. Assn.),** Email: RIndyke@SBCGlobal.net  
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

**Mr. Robert J. More (Anselm45@Gmail.com)** I represent to the court that Mr. More has consented to email service and prefers this method exclusively.

**Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)**

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221

<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. PKing@khl-law.com

or: PKing@KingHolloway.com ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

(Note: Mr. King has informed me that the Wacker Drive address is outdated and that this address is the current service address, and his law office website, listed above, confirms this is correct.) I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods.

**Paul L. Shelton, Esq.**

E-mail: PMSA136@aol.com ; PLShelton@SBCGlobal.net As the court has seen fit to deem Shelton a non-party and not in need of service (see comments in the orders in question, and the service list of same), I'm not serving Mr. Shelton a hard copy, just electronic copies.

\* **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](mailto: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](mailto:Hugh@HughDHowardLaw.com), per: <http://www.HughDHowardLaw.com>

**MERS (Mortgage Electronic Registration Systems, Inc.)**

<https://www.mersinc.org/about-us/about-us>

a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: JanisS@mersinc.org

Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email:

SandraT@mersinc.org – Director, Corporate Communications

Note: MERS is only being served electronically per above.

**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,” 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. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

- E-mail: I am contemporaneously serving all the parties listed above via email, in such cases as I have their e-mail address.

- 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: Thu 06 July 2017

Gordon Wayne Watts, *Intervenor, pro se*

821 Alicia Road

Lakeland, FL 33801-2113

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Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

Date: **Thursday, 06 July 2017**

## 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, 1<sup>st</sup> 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)**

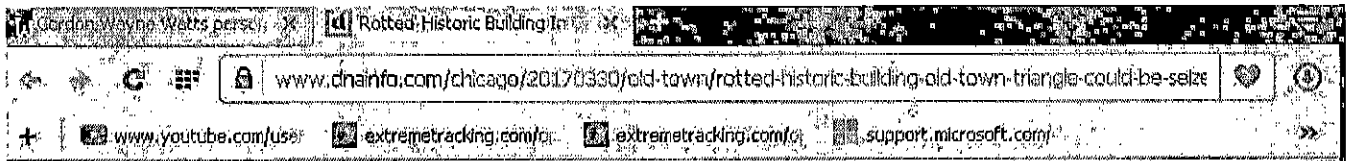
**FedEx package refused by Atty. Joseph Younes**

**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)**



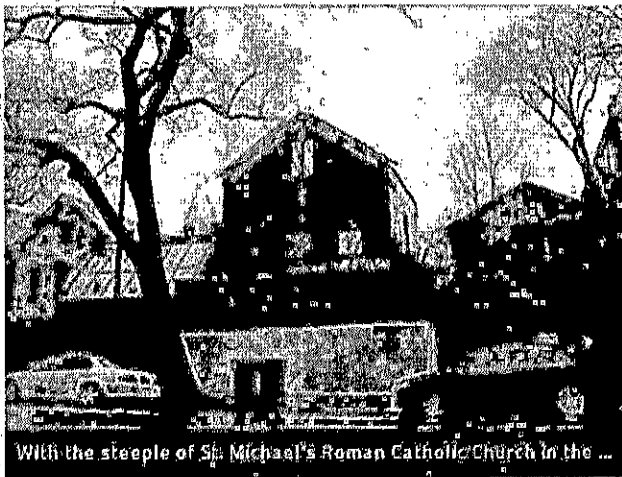
dnainfo CHICAGO FOLLOW SUBSCRIBE

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.

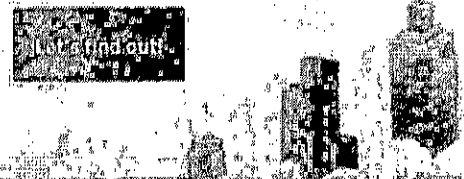
"We believe that this owner is allowing the building to deteriorate so he can obtain a demolition permit," said Ald. Michele Smith

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How Tall Will New Buildings in My Chicago Neighborhood Be?



Recommended

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

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:** sblevy@cookcountycourt.com  
**To:** gwww1210@gmail.com  
**CC:** gwww1210@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

[implment1@cookcountycourt.com](mailto:implment1@cookcountycourt.com)

Orders Fulfillment Cook Co District 1 - Chance.. (01020)

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

Order: 50280661																					
Order Details		Order Summary		Comments																	
Order Details <input type="checkbox"/>																					
Line #	Product	Price	Reference #																		
1	Chancery Division Fees/Costs (8613)	102.50	2004ch1081																		
Payment <input type="checkbox"/>																					
#	Type	Amount	Card/Acct	Last Name	First Name	Status															
1	CC	104.68	MC 2738	Watts	Gordon	Authorized	<input type="checkbox"/>														
Status		Order Open Payment Paid In Full																			
Source		POS																			
Fee Data		<table> <tr><td>Agency</td><td>102.60</td></tr> <tr><td>Expedite</td><td>0.00</td></tr> <tr><td>Misc</td><td>0.00</td></tr> <tr><td>VitalChek</td><td>2.18</td></tr> <tr><td>Shipping</td><td>0.00</td></tr> <tr><td>Other</td><td>0.00</td></tr> <tr><td><b>Total</b></td><td><b>104.68</b></td></tr> </table>						Agency	102.60	Expedite	0.00	Misc	0.00	VitalChek	2.18	Shipping	0.00	Other	0.00	<b>Total</b>	<b>104.68</b>
Agency	102.60																				
Expedite	0.00																				
Misc	0.00																				
VitalChek	2.18																				
Shipping	0.00																				
Other	0.00																				
<b>Total</b>	<b>104.68</b>																				
<a href="#">Print Receipt</a>																					

Copyright © 2008 – 2015 LexisNexis Risk Solutions. All rights reserved. 171.321.23100.200

Order Open Payment Paid In Full	
Source	POS
<b>Fee Data</b>	
Agency	102.50
Expedite	0.00
Misc	0.00
VitalChek	2.18
Shipping	0.00
Other	0.00
<b>Total</b>	<b>104.68</b>
<a href="#">Print Receipt</a>	

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  
CHNI-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: JESSICA CR#: 534

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

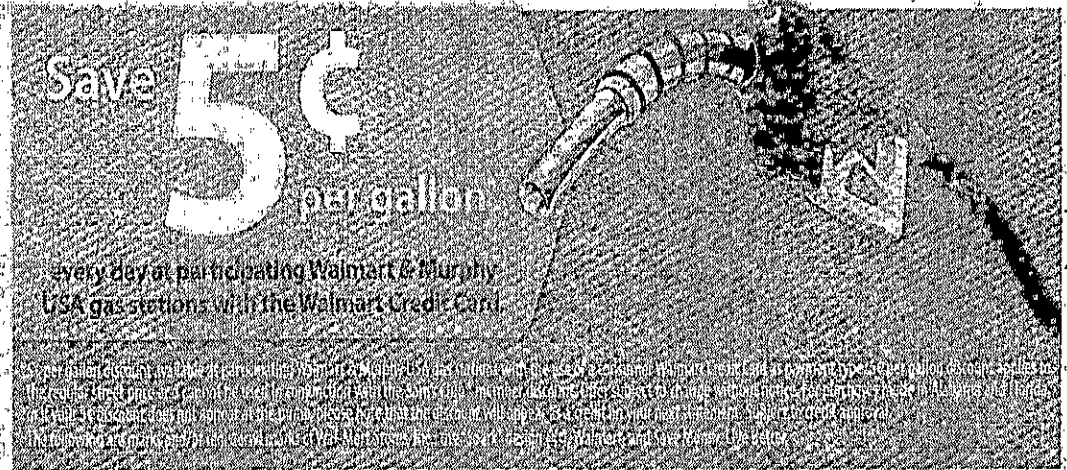
CASE TOTAL:	\$10.00	
Copy Fee		\$10.00
CREDIT CARD:		\$10.00
CHANGE		\$0.00
RECEIPT 0001 OF 0001 TRANSACTION TOTAL:		\$10.00

THANK YOU

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



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](http://walmart.com/credit)  
Customer Service: 1-888-611-1148

07/17/2015

Summary of Account Activity	
Previous Balance	\$4,353.74
- Payments	\$984.24
+ Purchases/Debits	\$121.07
+ Interest Charges	\$73.81
<b>New Balance</b>	<b>\$3,564.38</b>
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:

If you make no additional charges using this card and each month you pay	You will pay off the balance shown on this statement in about	And you will end up paying an estimate total of
Only the minimum payment	18 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 1-877-802-8775.

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

**Rewards News**  
Earning Rewards is easy! Every time you earn \$5, you will receive a Rewards Credit on your statement!

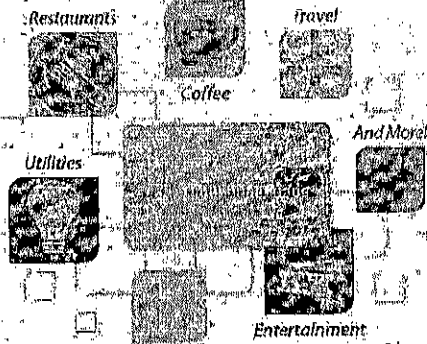
\$0    \$1    \$2    \$3    \$4    \$5

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 Synovus Bank pursuant to 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. or the "Spark" design (SM), Walmart, and Save Money Live Better.

Trans. Date	Trans. Ref. Number	Description of Transaction or Credit	Amount
06/25	65239145H00XTMJH	PYMNT IN STORE THANK YOU LAKELAND FL	(\$54.64)
06/28	65541066K03SNMYRL	INDO FOODMART 039 LAKELAND FL	\$1.09
06/30	65239145N00XTMJH	PYMNT IN STORE THANK YOU BARTOW FL	(\$87.82)
06/30	65239145N00XTMJH	PYMNT IN STORE THANK YOU BARTOW FL	(\$500.00)
07/03	65239145900XTMJH	PYMNT IN STORE THANK YOU PLANT CITY FL	(\$67.82)
07/07	65410135VMJ80NA88	FEDEX 488520339 MEMPHIS TN	\$32.56
07/08	65429605XFL6208KE	EBAY INC 08902868300 CA	\$37.04
07/08	65239145Y00XTMJH	PYMNT IN STORE THANK YOU LAKELAND FL	(\$84.50)
07/14	65410193SMJAH42K2	FEDEX 489124124 MEMPHIS TN	\$29.97
07/14	65239146400XTMJH	PYMNT IN STORE THANK YOU LAKELAND FL	(\$150.00)
07/16	0543684680040FR01	COOK CO FIRST MUNICIPAL CHICAGO IL	\$21.19
<b>FEES</b>			
<b>TOTAL FEES FOR THIS PERIOD</b>			<b>\$0.00</b>
<b>INTEREST CHARGED</b>			
<b>INTEREST CHARGE ON PURCHASES</b>			\$73.81
<b>INTEREST CHARGE ON CASH ADVANCES</b>			\$0.00
<b>TOTAL INTEREST FOR THIS PERIOD</b>			<b>\$73.81</b>

2015 Totals Year-To-Date	
Total Fees Charged in 2015	\$0.00
Total Interest Charged in 2015	\$401.51
Total Interest Paid in 2015	\$327.70

07/16 2015

June 2015 Invoice

Walmart  
eBay

Montgomery, TX  
26.3-16  
Hobby

eBay  
Montgomery, AL  
Hobby  
Spring, TX

PUBLIC RECORDS  
for  
Rick Damigaglia

\$21.19  
Richard B. Damigaglia Public Record Request  
for files in 3 out of 10 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.

Amici Curiae briefs; Choice, Civil Law, STATE + Appeals Court, MORTGAGE + Envelopes, Scatch Tape

\*Get up to \$100 quick cash in \$20 increments when you make a purchase with your Walmart Credit Card in Walmart-owned registers in Walmart stores. Limit one per day. This cash advance will appear on your monthly billing statement as 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 trademarks and/or registered marks of (W)al-Mart Stores, Inc. the "Walmart" design, (W)almart, and Save Money Live Better.

Trans. Date	Post Date	Reference Number	Description of Transaction or Credit	Amount
09/18	09/19	054101977M17H7NRE	FEDEX 402824334 MEMPHIS TN	\$69.01
09/24	09/24	054101970M1850VBS	FEDEX 402912859 MEMPHIS TN	\$150.45
09/30	09/30	85239147K00XTMJH4	PYMNT IN STORE THANK YOU LAKELAND FL	(\$207.00)
09/01	09/01	054101971M183K3NG	FEDEX 403554986 MEMPHIS TN	\$8.99
09/09	09/09	05410197VM1996JEE	FEDEX 404211701 MEMPHIS TN	\$53.99
09/09	09/09	65429907WRL77XB1Q	ERAY INC. 08362895860 CA	\$37.99
09/09	09/09	05410197X208BVBJA	FEDEX OFFICE 00008808 LAKELAND FL	\$38.21
09/10	09/10	05410197X0934N7R	USPS 1149220885710730 LAKELAND FL	\$11.60
09/10	09/10	05410197X208BZT1E	FEDEX OFFICE 00008808 LAKELAND FL	\$20.17
09/10	09/10	05410197X208BZT8R	FEDEX OFFICE 00008808 LAKELAND FL	\$4.29
09/10	09/10	05410197X296ZT49	FEDEX OFFICE 00008808 LAKELAND FL	\$4.69
09/10	09/10	85239147Y00XTMJH0	PYMNT IN STORE THANK YOU LAKELAND FL	(\$92.71)
09/12	09/12	05410197ZMJ7VWB12	FEDEX 404600235 MEMPHIS TN	\$121.70
09/13	09/13	852391483018RL8RD	WALMART 000779 LAKELAND FL	\$56.54
09/13	09/13	85239148100XTMJH7	PYMNT IN STORE THANK YOU LAKELAND FL	(\$49.49)
09/14	09/14	054101981M1800P80	FEDEX 404780701 MEMPHIS TN	\$19.58
09/14	09/14	054101981208BZ826	FEDEX OFFICE 00008808 LAKELAND FL	\$2.99
09/14	09/14	054101981208BZ840	FEDEX OFFICE 00008808 LAKELAND FL	\$2.29
09/14	09/14	8542268200VZPT10	THE UPS STORE 1086 LAKELAND FL	\$23.19
09/14	09/14	05432684818PF4FBDV	TUJANA FLATS BURRITO LAKELAND FL	\$16.00
09/16	09/16	85239148400XTMJH2	PYMNT 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	\$95.93
09/17	09/17		INTEREST CHARGE ON CASH ADVANCES	\$0.00
			TOTAL INTEREST FOR THIS PERIOD	\$95.93

2015 Totals Year-to-Date	
Total Fees Charged in 2015	\$0.00
Total Interest Charged in 2015	\$574.67
Total Interest Paid in 2015	\$478.64

Type of Balance	Expiration Date	Annual Percentage Rate	Balance Subject To Interest Rate	Interest Charge
Regular Purchases	NA	22.90%	\$5,091.35	\$95.93
Cash Advances	NA	25.90%	\$0.00	\$0.00

**Cardholder News and Information**  
 Eligible card purchases may be billed under one of the following promotions. No interest if paid in full within 5, 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 (x) 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 it to your account to a specific balance, please call Customer Service to discuss options that may be available.

8.99 Daniggelis  
 33.73 Daniggelis  
 19.32 Daniggelis  
 + 53.05

Print Job - Daniggelis  
 Dry Daniggelis

Fax - Daniggelis  
 Food  
 To 1st App Court

576 x 0.0960%  
 = 55.30  
 + 3.87 TAX

Sub. from Daniggelis

09/10/2015

19.50 Sub. from

131.78 S/A Fedex Express to Truck Card + Appeals Court Sub. from Daniggelis

\$11.50 Ship to Daniggelis

Walmart Multimeter Duct Tape, Scatch Tape



Card Activity

card number-xxxx-2748 expiration-date-05/19 card status-a

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

Available Balance \$55.57

Pending Transactions 2 transactions

PRINT

Gordon's Judge:

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

-2.99 McD  
-0.50 Transaction Fee  
=\$86.26

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

checks! :-)

- Find
- How to Report
- Report Card #
- VanillaCard.com
- Download Direct Deposit form

DATE	TRANSACTION	DEBIT	CREDIT
12/03/2015	MCDONALD'S #100 LAKELAND, IL Reference: 04000131D1A7 Description: PREAUTH TRANSACTION	\$2.99	
12/03/2015	LN COOK CO LAW 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

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 2 transactions

ZOOM view:

12/03/2015 MCDONALD'S #100 LAKELAND, IL \$2.99  
Reference: 04000131D1A7  
Description: PREAUTH TRANSACTION

12/03/2015 LN COOK CO LAW 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

1	2	3	4	5
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# Axiom Bank

axiombanking.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 16 15			\$ 123.91
DEC 26 DEPOSIT LAKELAND			200.00	\$ 323.91
DEC 26 RADIOSHACK COR PLANT CITY FL US *****8014 13917601	POS 442987	41.84		\$ 282.07
DEC 28 THE HOME DEPOT 2 LAKELAND FL US *****8464 06098901	POS 130402	79.60	Top Lights, Screens (ceiling)	\$ 202.47
DEC 28 THE HOME DEPOT 2 LAKELAND FL US *****6014 06098901	POS 171594	54.24	Household Lights	\$ 148.23
DEC 28 AMAZON DIG6889922 Misc. Paym 151221 CCD 698897657D		.68		\$ 148.91
DEC 30 Clearpoint Finan BILL PYMNT PPD		120.00		\$ 28.91
JAN 02 WM SUPERCENTER 7547-KEYS PLANT CITY FL US *****8464 89999999	POS 000005	19.05	Copied	\$ 9.86
JAN 11 DEPOSIT LAKELAND			111.00	\$ 120.86
JAN 13 DEPOSIT LAKELAND			66.00	\$ 186.86
JAN 13 LN*COOKCOLAWDIV L... 866-255-1857 IL US *****8464 89999999	POS 000009	2.25	Public Records Request	\$ 184.61
JAN 14 OREILLY AUTO PARTS LAKELAND FL US *****8464 05371609	POS 069245	29.91	Mcbr Oil	\$ 154.70

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	

19.05 = 5 gifts of  
 Copied & pay for  
 mail PC house -  
 front door - Locks Deadbolt

110.48 payment  
 + 9.52 prep  
 = \$120.00



# AXIOM BANK

axiombanking.com • (800)584-6016

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			BALANCE SUMMARY
ACTIVITY BEGINNING		JAN 16 '16	WITHDRAWALS	DEPOSITS	\$ 154.70
JAN 21	COOK CO FIRST MUNICIPAL CHICAGO IL US	000000	13.28		\$ 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 PPD		120.00		\$ 283.34
FEB 06	FEDEXOFFICE LAKELAND FL US	00008508 000086	275.42		\$ 7.92
FEB 08	FEDEXOFFICE LAKELAND FL US	00008508 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	

Banking and More

Public Records REQUEST

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

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

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)584-0016

003792  
 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 99999999				
MAY 18 DEPOSIT LAKELAND			95.00	\$ 164.66
MAY 26 THE UPS STORE 1053	POS	9.60		\$ 155.06
CHICAGO IL US	000000			
*****8464 99999999				
MAY 31 AMAZON DIG738757 Misc. Paym	160521		2.17	\$ 157.23
GCD 76149970D				
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



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

Ret. 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](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)  
Web: [www.GordonWatts.com](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://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)

House Copy

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

Friday, 01 July 2016  
Axiom Bank  
Money Order # 41742051

Dear Attorney Schillaci:

BBVA  
Doc 853548

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,  
*Gordon Wayne Watts*  
Gordon Wayne Watts

Bank Acct #  
2001653548  
Money order (Axiom)  
Acct # 28175000 (Bank)  
Money Order # 41742051  
07-01-2016 for \$ 76.25

USPS 07-01-2016 (Friday)

Ret. 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 07/01/2016  
 MONEY ORDER Friday \*\$ 76.25  
 Gordon Watts 41742051  
 CUSTOMER COPY

Purchaser's Name	MO No.	Date	Check Amount
Gordon Watts	41742051	07/01/2016	*****\$76.25
Name	Account Number	Transaction Description	
1-4-2751 & 1-15-0662	28175000		

(Comb Records)  
 Back Acct # - 2001653548

28175000

CASH (not from bank account)

NON-NEGOTIABLE

**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: *Att. Hon. Tim Schillace Esq.*  
 40 1st District Appellate Court  
 CLERK'S OFFICE  
 160 North LaSalle Street  
 Chicago, IL 60601-3130

2. Article Numerical Reference from mailpiece:  
 15 1730 0001 2318 4603

PS Form 3811, April 2015 PSN 7530-02-000-9033

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature *[Signature]*  Agent  Addressee

B. Received by (Printed Name) \_\_\_\_\_ C. Date of Delivery \_\_\_\_\_

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

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Actual Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

Kitsher  
 07/01/2016 1:13 PM  
 Jaquan WU139  
 Check: 10040  
 #1065 863-603-9224

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

For delivery information, visit [www.usps.com](http://www.usps.com)

CHICAGO IL 60601

Date of Mail: 07/01/2016

Postage: \$6.47

Total Postage and Fees: \$8.47

Address: *Att. Hon. Tim Schillace Esq.*  
 40 1st District Appellate Court  
 160 North LaSalle Street  
 Chicago, IL 60601-3130

7015 1730 0001 2318 4603

PSN 7530-02-000-9033 SEE EXTENSION DETAILS. PRE-SUMMIT - SEE EXTENSION DETAILS. PRE-SUMMIT - SEE

**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



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)

---

5/10/2017

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>



September 18, 2015

Dear Customer:

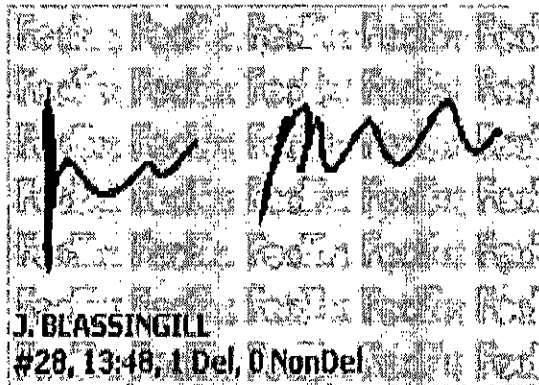
The following is the proof-of-delivery for tracking number 781311007128.

---

**Delivery Information:**

---

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



---

**Shipping Information:**

---

<b>Tracking number:</b>	781311007128	<b>Ship date:</b>	Sep 10, 2015
		<b>Weight:</b>	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)**

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:** 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 (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

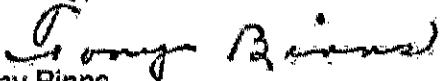
Dear Mr. Watts:

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, 2<sup>nd</sup> 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:**

---

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

**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:**

---

<b>Tracking number:</b>	7862-7122-6226	<b>Ship date:</b>	Apr 18, 2017
		<b>Weight:</b>	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.



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](mailto:trackingupdates@fedex.com)

**Reply To:** [trackingmail@fedex.com](mailto:trackingmail@fedex.com)

**To:** [www1210@aol.com](mailto:www1210@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:	<u>786271226226</u>
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.

FROM: Gordon Watts (663) 681  
821 ALICIA RD  
LAKELAND, FL 33901  
US

31  
MCC  
DOW  
3008372330  
33881  
1081  
3008372330  
33881  
1081  
3008372330  
33881  
1081

Joseph Younes/599467626

SHIP LABEL REV 03/10 - RUN 1/2017

### FedEx RETURN TO SHIPPER

Dear Customer - This package is being returned to you.

- Hold 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-908 & SF-136 to all Hazmats.
- Other:

Package received on trailer from shipper:

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

02-018 04/2017

STATION: 606

ISSUED BY: PLG

MGMT APPROVAL SIGNATURE

RETURN STATE: FL

RETURN ZIP: 33880

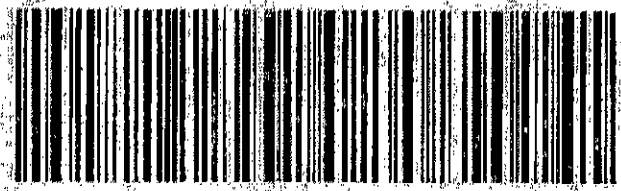
Remove label here

NLP FACILITY

7862 7122 6226

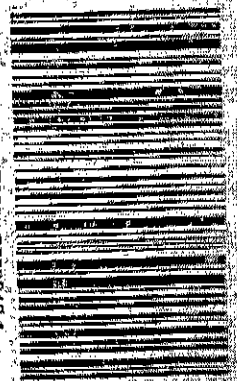
60602

9822 0417 3 (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?) R.Joe69

661912) 7370809 8993843-1



920-1580

JOSEPH YOUNES LAW OFFICES  
166 W WASHINGTON ST  
CHICAGO, IL 60602-2317