

#09800  
~~Signed Original~~

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

GMAC Mortgage, LLC n/k/a: Bank of America, N.A. ) Case No.: 2007 CH 29738  
aka: "LaSalle Bank National Association," aka "US Bank, )  
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX, ) Before: Hon. Diane M. Shelton  
Plaintiff ) Calendar "W", Courtroom 1912  
vs. )  
Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al., ) Presiding Judge so assigned  
Defendants ) or whichever other judge  
may so preside in Law Div

Motion for leave to file *Amicus Curiae* brief

While it would appear that Friend of the Court (*Amicus Curiae*) briefs are not common in Illinois courts, nonetheless, they are permitted: *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—which I clearly do insofar as I use several legal arguments that no lawyers on either side have used. [This holding is analogous to Rule 37.1 of the U.S. Supreme Court, which states: "1. An *amicus curiae* brief that brings to the attention of the Court relevant matter **not already brought to its attention by the parties** may be of considerable help to the Court." (Emphasis added in bold-faced underline for clarity; not in original)] 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, 7<sup>th</sup> Cir., Opinion July 31, 2000: [http://media.ca7.uscourts.gov/cgi-bin/rssExec.pl?Submit=Display&Path=Y2000/D07-31/C:99-3076:J:\\_:aut:T:op:N:0:S:0](http://media.ca7.uscourts.gov/cgi-bin/rssExec.pl?Submit=Display&Path=Y2000/D07-31/C:99-3076:J:_:aut:T:op:N:0:S:0))

**Second *AMICUS CURIAE* BRIEF OF GORDON WAYNE WATTS  
IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS**

**I. Introduction**

This brief is an addendum to update the filings (sworn affidavit, *amicus* brief, & "Time-Sensitive Judicial Notice of Adjudicative Facts-in semi-Emergency Fashion by OVERNIGHT FedEx,"), which are docketed as 09/14/2015 (tho actually filed by mail a few days earlier). This Court has acknowledged receipt of both the docketed copies and courtesy copies—and is presently reviewing them in this Mortgage Fraud case [which has a hearing today in Room 1912 @9:00am, CST], but new events require today's update.

**II. Interests of the *Amicus***

This *amicus* is friends with Mr. Daniggelis, the victim of this mortgage fraud, but even aside from that, his religious beliefs compel him to do justice and defend the defenseless, as he did in his 4-3 loss, before Florida's State Supreme court, in the infamous Terri Schiavo case (case law cited in prior filings). As *amici* are, theoretically, permitted in IL courts, this *amicus* asserts his Redress and free exercise of Religion rights, two of the five rights guaranteed by the First Amendment.

**III. Summary of the Case File / Subsequent Statement of Facts**

The statements & affirmations of fact contained in the 09/14/2015 sworn Affidavit of *Amicus*, Gordon Wayne Watts, filed in the above-captioned case, are incorporated by reference herein as if fully set forth

herein. In addition to that which I stated back in late 2015, there were some new developments, and this “Statement of Facts” picks up where I left off in my prior filings:

As you can see in my Sept. 09, 2015 “Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi-Emergency* Fashion by OVERNIGHT FedEx,” (shown on docket as '9/14/2015'), I issued a solemn warning to This Court (and other courts) that Atty. Joseph Younes, the co-defendant in the above-captioned case, and who benefited from the forged signature, was gutting, destroying, and otherwise engaged in illegal construction and/or demolition to the extent that the City of Chicago Building Department was forced to issue a “STOP WORK ORDER.” I implored This Court to issue a TRO (Temporary Restraining Order) aka an Injunction to save the house from illegal destruction (which would moot the appeal pending at the time, and moot all other court action). But, This Court, in its infinite wisdom, chose to ignore me.

More recently, however, Younes engaged in *additional* illegal construction and/or demolition, **again** drawing the ire of the City Building Department. But this time, left unchecked by the courts, and given the “green light” to proceed at full-throttle, Younes engaged in much *worse* destruction, so much so that it made several local news media:

((a)) “‘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>

((b)) “‘Rotted’ Old Town Triangle House Owner Faces Daily \$1K Fine As Charges Fly,” by Ted Cox, *DNAinfo*, April 07, 2017: <https://www.DNAinfo.com/chicago/20170407/old-town/rotted-old-town-triangle-house-owner-faces-daily-1k-fine-as-charges-fly>

((c)) “Chicago Courts refuse to stop illegal construction/demolition: “Mortgage Rescue Scam” victim's house almost destroyed,” from Staff Reports, *The Register*, April 14, 2017:

perma-link: <http://GordonWatts.com/#MortgageFraud-2017UPDATES> **or:**

perma-link: <http://GordonWayneWatts.com/#MortgageFraud-2017UPDATES>

((d)) “Chicago Courts refuse to help elderly 'Mortgage Rescue Scam' victim; make him homeless,” from Staff Reports, *The Register*, December 01, 2015: [updates to this 2015 story reflect the new developments]

perma-link: <http://GordonWatts.com/#MortgageFraud-2015> **or:**

perma-link: <http://GordonWayneWatts.com/#MortgageFraud-2015>

I am tempted to yell “I told you so,” to the courts & local news media that ignored my pleas, but even nonlawyers, as myself, realise that this would be unprofessional (thus nonproductive) to put in any court filing, so I will refrain. But, it suffices to say that the undersigned *Amicus* is confident that This Court is, after many missteps, now doing its genuine best to justly review/redress these egregious grievances.

Moreover, I solemnly warned the courts that Atty. Andjelko Galic (also a friend of mine, and the lawyer representing Richard Daniggelis) kept missing filing dates (**see: Exhibit-F**), not to mention that he failed to include several key vital arguments, any one of which could – individually – show that forgery had occurred. Either or both of these could justify an *amicus* brief. While many parties have stated that Daniggelis is 'represented' by an attorney, and thus would not need any help, Mr. Daniggelis recently told me that there is only one thing worse than being unrepresented, and that would be to be represented by an attorney who keeps missing court dates and fails to get key documents into the court record, like the 2 police reports (**see: Exhibit-A**), about the break-in by the bank, and the initial forgery complaint, both of which Galic refused to get. In fact, the police refused to give Daniggelis his own report but gave me a copy, under Freedom of Information -albeit redacted a little bit. The system is “broke” when an outsider

like *myself* has more access to a police report than the **victim, himself**—and when the victim's own lawyer adamantly refuses to get it (which is what the police told Daniggelis would need to be done to get a copy of these 2 police reports). **Both police reports give more proof of Mortgage Fraud, and, as such, Galic should have entered them into the record: They were dispositive to key elements of the case—namely showing mens rea on the part of the bank, Paul Shelton, and Joseph Younes.** For details of the break-in, please refer to the 11/16/2015 “MOTION FILED,” by “MOORE ROBERT” (sic: misspelling, and should read: Robert J. More). Mr. More claims 'trespass on the case' by the bank, which broke in, and did not get investigated by the police, because (according to Daniggelis), the police viewed the illegal break & entry as a “civil” matter (which it is not: breaking & entering is criminal in nature).

Daniggelis also told me that Judge Sconza, on one occasion, would not let him defend against this mortgage fraud without an attorney, but refused to provide a court-appointed attorney. He reports that all contemporary witnesses to that exchange said that had Daniggelis not been allowed to represent himself (which is his right) he would have lost his house right then & there, meaning that, while I believe the judge may have had good motives in insisting Daniggelis be quiet until he got a lawyer, nonetheless, this implicated Procedural Due Process, and biases the courts against those who are too poor to afford an attorney.

One more fact needs to be added: I recall Mr. Daniggelis telling me that Judge Otto said, in open court, that he (Daniggelis) was at the closing, but not at the deposition. Mr. Daniggelis said that this was **backwards**: that he *was* at the deposition, but **not** at the closing, and did not even know about it. I include this recollection because Atty. Galic has the transcripts of what Judge Otto said, and other records of attendance can check Judge Otto's accuracy, and, since it's possible that Judge Otto got these key facts “wrong,” this is clear reversible error. In Otto's defense, I recall Daniggelis telling me that Younes lied about some aspect of his attendance at the closing, either that Daniggelis supposedly claimed his back hurt and to proceed without him, or that he did, in fact attend. [I urge The Court to question Daniggelis on this, and other, points, as both lawyers and judges have told him to be quiet – to be seen & not heard.]

Looking at my notes, taken when speaking to Mr. Daniggelis, I now recall one thing that he claims that Judge Sanjay T. Tailor (who preceded Judge Diane M. Shelley on this case) told Atty. Galic: When Galic was having trouble deposing John LaRouche (who kept evading the deposition), Daniggelis said that Tailor suggested to Galic to use subpoenas, instead. I'm not sure what was meant, but Mr. Daniggelis wanted This Court to know about it because, according to him, his lawyer was negligent in refusing Judge Tailor's offer. [Daniggelis thinks that Younes didn't bring “his own money” to the closing, relying instead on LaRouche, and that this is violation of some law. I don't know what the law here it, but mention is because it may be of relevance later.] More importantly, though, LaRochce or others may know who executed the forgery.

I am almost finished with the “updates” to this Statement of Case/Facts, as stated in my prior Affidavit. (I was going to get this statement notarised, like the last one, but due to the holidays and other factors, I will have to submit a “regular” brief this time. But I trust **This Court** still gives my assertions full weight & credit.) So, in conclusion, I am appending my prior filings with new developments of fact & new arguments at law.

#### IV. Argument

The legal arguments contained in the 09/14/2015 “*AMICUS CURIAE* BRIEF OF GORDON WAYNE WATTS,” filed in the above-captioned case, are incorporated by reference herein as if fully set forth herein. **New developments raise newly-discovered legal arguments—as follows:**

First, given the gravity of the situation (felony forgery, committed against an elderly victim, destruction of

a house worth almost a million dollars—in the historic district—coupled with repeated failures of the system, letting it “slip through the cracks,” so to speak), it is appropriate to briefly recap the prior arguments:

In my prior *Amicus* brief in this case (09/14/2015), Arg.IV.A. (Photocopied (forged) signature), I prove what others merely alleged: While Benji Philips (Daniggelis' other attorney) did raise the issue of a “Whiteout,” that proves nothing: Anyone can make a mistake, and what's what Whiteout is used for.

**This point is so important, I will “camp out” here for just a moment:** When I tell “ordinary Joe's” (e.g., non-attorneys and people who don't know about this case) the example of “what if you saw your driver's license signature” and then saw your signature on something else—but EXACTLY the same as on your driver's license, what might we conclude? ANSWER: **All** respondents to my question rightly concluded that someone would've had to have photocopied their signature, since no mere mortal can sign his/her name exactly the same twice in a row. (Had the handwriting merely been 'similar,' then, yes, we might need a “handwriting expert,” but here, beyond all reasonable doubt, this was a forgery by photocopying a prior signature of Daniggelis, when a prior deal fell through because Daniggelis was wise enough to put in place side-agreements that protected him.) Thus, forgery, which has no statutes of limitations, was conclusively proved to have been done, and subpoenas & depositions (which previously did not address this point) are in order—so that witnesses may turn on one another, and the truth may come out. **This fact alone proves fraud!**

Arg.IV.C (Lack of consideration (payment)) gives compelling proof that Daniggelis would not just “hand over” his property (as was alleged). (Moreover, even were he to do so, no contract is valid without consideration, e.g., payment.) **This fact alone proves that Daniggelis had no motive to 'sign over' his house & property as alleged, thereby showing fraud!** And, in case anyone doubts, Arg.IV.D. Proves this: There is **no record of payment. Period. Equals: fraud!**

Arg.IV.G. (Forged POA (Power of Attorney)) shows, in the exhibits, 2 versions of the POA, one notarised & one not. While Daniggelis did sign this, nonetheless, notarising a document “after the fact,” as here, shows *mens rea*, Criminal Intent. **However, Daniggelis brought to my attention one key element that I'd overlooked in my last *Amicus* brief:** He told me that the fact that he admits to signing this POA would make it look like he really did sign over his house (which is not true). **So, I will address that here:** Yes, Daniggelis signed this POA, but first off, the record shows he had several side agreements that limited the parameters, meaning that the house could not just get transferred over. In case you don't “get” this argument, I'll spell it out for you: We see that Paul Shelton (who got disbarred over another mortgage fraud case) & Joseph Younes (who is likely to get disbarred in like manner).did not transfer title on that first signature, which is proof of the existence of the side-agreements, OK? So, that deal “fell through,” and Younes was getting greedy. So, what did he do? Well, as shown above, there was a forgery (via photocopy) of Daniggelis' signature, and then Judge Michael F. Otto, eventually, approved the 'sale,' lifting the 'cloud' on the title, caused by the affidavit Daniggelis executed of the forgery. [I put 'sale' in quotes, as no sale occurred.] I respectfully move This Court for clarification as to why Judge Otto's order is legal and just.

#### **The “Batmobile” Argument**

Younes might assert that he did not know that there was a forgery (and this might have been true, in the past). Indeed, looking at the email exchange between myself and Asst. State's Attorney, Thomas Simpson [see: **Exhibit-G**], Simpson clearly tells me that he doesn't know who did the forgery, and that this is the reason he can't prosecute. But is this really so?

Indeed, as the record shows, Younes was put on notice of this photocopy forgery fraud (a felony with NO statutes of limitation, e.g., a 'serious' felony!) by virtue of both the court docs I filed, as well as that which his office signed for and received. [See e.g., **Exhibit-B and Exhibit-C, where Younes feigns ignorance, and I catch him in several lies –including this one –in my exchanges with the IARDC.**]

That would be like some 17-year-old kid stealing The Batmobile from a museum, and selling it to a stranger, on the street, for a few hundred dollars: Everyone knows the Batmobile belongs in a museum (or, in the Bat Cave, with Batman!), and does not belong to some 'ordinary Joe,' OK? Thus, the poor bloke who tries to tell Police that he bought the Batmobile, and is unable to tell who sold it to him would **\*\*still\*\*** get arrested for “Dealing in Stolen Property,” ok?

Likewise, while we may not know (right now) who effected the photocopy forgery of Daniggelis' signature, we do know that it was a forgery—and now, so does Younes. So, like the poor bloke who 'bought' the Batmobile, and plead ignorance, Younes, too, is guilty of **\*\*KNOWINGLY\*\*** dealing in stolen property, and being part-and-party to the use of the forgery, which, again, has no statutes of limitations = equals = jail time for Mr. Younes if the States' Attorney supervisors (with whom I am in communication) accept my legal arguments and overrule Asst. State Atty. Thomas Simpson's decision to not prosecute.

It is, however, of no small moment that Asst. State Atty. Simpson admitted in a recent email exchange that he agreed with me, and believed that a crime had been committed. He is, I believe, honest, and wants to do the right thing. (How many others will have their houses stolen? This must stop!) However, Simpson is afraid, since one “bad ruling” (by Judge Otto) caused a domino effect, and put all others in fear of doing the right thing. Other arguments (Subrogation, Linda Green robo-signing, conflict of interest, res adjudicata, etc.) were raised by myself and Galic in prior filings, and will not be repeated here for the sake of brevity.

However, here is one thing that has not been mentioned at all, so I will mention it: Looking at the complaint that Joseph Younes filed with the Illinois Attorney General [see: **Exhibit-D**], we see he complains about supposed conspiracy between banks and title companies, regarding the robo-signing fraud, OK? However, what does Younes do? He continues the transaction with said entities, and benefits from the transaction in question: Even if there was no robo-signing conspiracy, Younes admits as much, and then participates (and benefits from) said conspiracy, so he is admitting (by his actions, which speak louder than words) of his guilt.

Lastly, while I am not wont to take a swipe at a judge (it would be unprofessional, and morally wrong, no matter how much I disagree with a ruling), I must state, for the record, that Judge Michael F, Otto committed (whether intentionally or not, I do not know) a very serious libel, when, in his recent ruling, he said that I was bragging that it would be OK to use vexatious litigant tactics. His exact words: “The argument that all strangers to a case should be allowed to engage in the tactics of a vexatious litigant are so unpersuasive as to require no further discussion.” (OTTO order, dated Dec. 07, 2015, in case 07-CH-29738, in other words, the Chancery case that was transferred to the Law Division.) **That is false:** If you look within the 'four corners' of my various pleadings before Judge Otto's court, the only things I said about vexatious litigants was the fact that my friend, Robert J. More (who is a named party, in this above-captioned case) was labeled as a vexatious litigant, by this court (and other courts), and that I noted that Mr. More's filings got into the record, and I told the court that since I was **\*\*not\*\*** a vexatious litigant, and had followed the rules, I expected it would be only right to treat me as well. (I did **\*\*not\*\*** ever threaten to use vexatious litigant tactics, nor do I condone or tacitly support such. Otto was wrong in his off-colour comment, which is sad: Other than that comment – and several obviously very bad rulings he made against myself and Daniggelis – Judge Otto showed himself to be a very bright jurist, insofar as gave excellent attention to both fact and law, and did so in a timely manner—more than I can say about some judges, who flatly ignored similar pleadings, and whom I shall not name, in this venue, out of

professional respect.)

**CONCLUSION:**

**Looking at Exhibit-E**, the only exhibit I did not mention above, I see that Daniggelis files this pleading before the Appeals Court, when his lawyer, Atty. Galic, went out of the country, let both appeals get dismissed for want (lack) of prosecution, and then took no action to ask the court to prevent his house from being destroyed by Younes. This is impressive for a non-attorney to do (and looking closely at it, I see similarities in some things I've filed, which showed that Mr. Daniggelis was paying attention to details!).

However, at the end of the day, he is not an attorney, and he should not be required to do “attorney things,” just to get a fair day in court. Judge Otto's comments about Daniggelis being “doggedly represented” by Galic & Philips, and how these attorneys “filed voluminous motions,” in his 10/29/2015 “MOTION TO – DENIED” on the Chancery Docket of this case, are a misrepresentation of the facts: Daniggelis got mediocre, not 'doggedly' representation at best, and then got very obviously unfair rulings, not supported by law.

When Galic filed a motion before Tailor, asking my Amicus brief to be stricken, this was a clear sign that he was intimidated by the court: In other cases, where I've filed Amicus briefs, no lawyer on my side has ever had a problem with my support, so the problem is clearly with Galic's fear of the court—some of which I think is founded.

Galic has dropped the ball too many times to be trusted to represent Daniggelis all by himself, but Galic is still useful, and Daniggelis and I both hope Galic will continue to offer help, as needed. My pleadings, alone, should be sufficient to prove a forgery occurred, but the only way that This Court can get to the bottom of this debacle would be to depose everybody about that matter, and issue bench warrants for those who might abscond (like John LaRoche is doing). That Judge Tailor did not issue a bench warrant or other subpoenas is disquieting. However, I ask: Is the court up to squeezing the truth out of “the players” who were involved in this forgery—getting them to testify against one another, until the truth comes out?

Please take note of my motion for rehearing (dated 11/30/2015 on the docket). Looking at it, I now see that that I was wrong about the telephonic conference rule: It is optional, not mandatory. Since I am willing to admit wrong, This Court should know that I am not above admitting wrong on the forgery and fraud issues, here. But, if I am wrong, The Court will have to show me; otherwise, an unjust ruling is allowed to stand. **The conclusion of the whole matter is this: Chancery transferred the case to Law, and with all appeals dismissed for want of prosecution, The Law Division has full, complete, and plenary jurisdiction on the merits of the case, and can correct reversible error. Is the court up to the task of deposing all witnesses to actually get to the bottom of this mess & learn the Truth?**

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

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above “**Second AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS,**” and its exhibits were delivered to the following parties as indicated – this Monday, the 17<sup>th</sup> day of April 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.] Diane.Shelley@CookCountyIL.gov ; ccc.LawCalendarW@CookcountyIL.gov  
(312) 603-5940, (312) 603-7551, (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.),  
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)

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>

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 “Second AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS,” and its exhibits, were served upon all parties listed above, this 17th day of April, 2017 by the following methods:

- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford. (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: Monday, 17 April 2017

Gordon Wayne Watts, *Amicus Curiae*\*

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880

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: Monday, 17 January 2017

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



## INDEX TO THE EXHIBITS

<u>Instrument</u>	<u>Docket/Tab#</u>
<b>Both police reports</b>	<b>Exhibit-A</b>
29 October 2013 [Report #: HW512419] that bank employees broke locks, 25 September 2009 [Report #: HR563391] that Mortgage Fraud [financial exploit of Elderly] 23 April 2003 [Report #: HJ319798] unrelated report that was included in FOIA request	
<b>IARDC complaint, dated 08 October 2015</b>	<b>Exhibit-B</b>
<b>IARDC complaint, dated 30 April 2016</b>	<b>Exhibit-C</b>
<b>Note to Richard Daniggelis, dated 16 April 2017</b>	<b>Exhibit-D</b>
Besides commentary/discussion, this note contains 5 documents: 1. Lawsuit against Younes filed: Bank America NA filed Contract complaint on: 07-03-2012 2. Younes complaints to OAG about Linda Green conspiracy: Feb 06, 2013 3. Sweet Loan Mod: US Bank & Younes: Sept 11, 2013 (pages 8-9) or Oct 15, 2013 (page 10) 4. Lawsuit against Younes dropped: Dismiss by stipulation or agreement: 10-23-2013 5. Judge Otto rules in favour of Younes: May 15, 2014	
<b>Richard's Emergency motion and ORDER</b>	<b>Exhibit-E</b>
<b>Two key rulings directed at Atty. Andjelko Galic</b>	<b>Exhibit-F</b>
<b>Email exchange with Cook County State's Attorney Office</b>	<b>Exhibit-G</b>
(Note: I may print out only the first seven pages of this as my exhibit, for the sake of brevity, but the PDF file, when I serve it 'electronically,' is a 23-page document. Whether or not I include all 23 pages in the attachment will be dependent on things like printing costs, but I will serve the parties the same thing that I serve the court, in any case, so as to not effect bad service.)	

~~Sworn Original~~

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

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.	)	Case No.: 2007 CH 29738
aka: "LaSalle Bank National Association," aka "US Bank,	)	
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,	)	Before: Hon. Diane M. Shelley
Plaintiff	)	Calendar "W", Courtroom 1912
vs.	)	
	)	Presiding Judge so assigned
Atty: Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,	)	or whichever other judge
Defendants	)	may so preside in Law Div.

FILED-12  
 2015 SEP 14 PM 3:49  
 CLERK OF COURT  
 COURT OF COOK COUNTY  
 LAW DIVISION

**Motion for leave to file *Amicus Curiae* brief**

While it would appear that Friend of the Court (*Amicus Curiae*) briefs are not common in Illinois courts, nonetheless, they are permitted: *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—which I clearly do insofar as I use several legal arguments that no lawyers on either side have used. [This holding is analogous to Rule 37.1 of the U.S. Supreme Court, which states: “1. An *amicus curiae* brief that brings to the attention of the Court relevant matter **not already brought to its attention by the parties** may be of considerable help to the Court.” (Emphasis added in bold-faced underline for clarity; not in original)] 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, 7<sup>th</sup> Cir., Opinion July 31, 2000: [http://media.ca7.uscourts.gov/cgi-bin/rssExec.pl?Submit=Display&Path=Y2000/D07-31/C:99-3076:J:\\_:aut:T:op:N:0:S:0](http://media.ca7.uscourts.gov/cgi-bin/rssExec.pl?Submit=Display&Path=Y2000/D07-31/C:99-3076:J:_:aut:T:op:N:0:S:0)

**Second *AMICUS CURIAE* BRIEF OF GORDON WAYNE WATTS  
IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS**

**I. Introduction**

This brief is an addendum to update the filings (sworn affidavit, *amicus* brief, & “Time-Sensitive Judicial Notice of Adjudicative Facts-in semi-Emergency Fashion by OVERNIGHT FedEx,”), which are docketed as 09/14/2015 (tho actually filed by mail a few days earlier). This Court has acknowledged receipt of both the docketed copies and courtesy copies—and is presently reviewing them in this Mortgage Fraud case [which has a hearing today in Room 1912 @9:00am, CST], but new events require today's update.

**II. Interests of the *Amicus***

This *amicus* is friends with Mr. Daniggelis, the victim of this mortgage fraud, but even aside from that, his religious beliefs compel him to do justice and defend the defenseless, as he did in his 4-3 loss, before Florida's State Supreme court, in the infamous Terri Schiavo case (case law cited in prior filings). As *amici* are, theoretically, permitted in IL courts, this *amicus* asserts his Redress and free exercise of Religion rights, two of the five rights guaranteed by the First Amendment.

**III. Summary of the Case File / Subsequent Statement of Facts**

The statements & affirmations of fact contained in the 09/14/2015 sworn Affidavit of *Amicus*, Gordon Wayne Watts, filed in the above-captioned case, are incorporated by reference herein as if fully set forth

herein. In addition to that which I stated back in late 2015, there were some new developments, and this “Statement of Facts” picks up where I left off in my prior filings:

As you can see in my Sept. 09, 2015 “Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi-Emergency Fashion* by OVERNIGHT FedEx,” (shown on docket as '9/14/2015'), I issued a solemn warning to This Court (and other courts) that Atty. Joseph Younes, the co-defendant in the above-captioned case, and who benefited from the forged signature, was gutting, destroying, and otherwise engaged in illegal construction and/or demolition to the extent that the City of Chicago Building Department was forced to issue a “STOP WORK ORDER.” I implored This Court to issue a TRO (Temporary Restraining Order) aka an Injunction to save the house from illegal destruction (which would moot the appeal pending at the time, and moot all other court action). But, This Court, in its infinite wisdom, chose to ignore me.

More recently, however, Younes engaged in *additional* illegal construction and/or demolition, **again** drawing the ire of the City Building Department. But this time, left unchecked by the courts, and given the “green light” to proceed at full-throttle, Younes engaged in much *worse* destruction, so much so that it made several local news media:

((a)) “‘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>

((b)) “‘Rotted’ Old Town Triangle House Owner Faces Daily \$1K Fine As Charges Fly,” by Ted Cox, *DNAinfo*, April 07, 2017: <https://www.DNAinfo.com/chicago/20170407/old-town/rotted-old-town-triangle-house-owner-faces-daily-1k-fine-as-charges-fly>

((c)) “Chicago Courts refuse to stop illegal construction/demolition: ‘Mortgage Rescue Scam’ victim's house almost destroyed,” from Staff Reports, *The Register*, April 14, 2017:

perma-link: <http://GordonWatts.com/#MortgageFraud-2017UPDATES> *or*:

perma-link: <http://GordonWayneWatts.com/#MortgageFraud-2017UPDATES>

((d)) “Chicago Courts refuse to help elderly ‘Mortgage Rescue Scam’ victim; make him homeless,” from Staff Reports, *The Register*, December 01, 2015: [updates to this 2015 story reflect the new developments]

perma-link: <http://GordonWatts.com/#MortgageFraud-2015> *or*:

perma-link: <http://GordonWayneWatts.com/#MortgageFraud-2015>

I am tempted to yell “I told you so,” to the courts & local news media that ignored my pleas, but even nonlawyers, as myself, realise that this would be unprofessional (thus nonproductive) to put in any court filing, so I will refrain. But, it suffices to say that the undersigned *Amicus* is confident that This Court is, after many missteps, now doing its genuine best to justly review/redress these egregious grievances.

Moreover, I solemnly warned the courts that Atty. Andjelko Galic (also a friend of mine, and the lawyer representing Richard Daniggelis) kept missing filing dates (**see: Exhibit-F**), not to mention that he failed to include several key vital arguments, any one of which could – individually – show that forgery had occurred. Either or both of these could justify an *amicus* brief. While many parties have stated that Daniggelis is ‘represented’ by an attorney, and thus would not need any help, Mr. Daniggelis recently told me that there is only one thing worse than being unrepresented, and that would be to be represented by an attorney who keeps missing court dates and fails to get key documents into the court record, like the 2 police reports (**see: Exhibit-A**), about the break-in by the bank, and the initial forgery complaint, both of which Galic refused to get. In fact, the police refused to give Daniggelis his own report but gave me a copy, under Freedom of Information -albeit redacted a little bit. The system is “broke” when an outsider

like *myself* has more access to a police report than the **victim, *himself***—and when the victim's own lawyer adamantly refuses to get it (which is what the police told Daniggelis would need to be done to get a copy of these 2 police reports). **Both police reports give more proof of Mortgage Fraud, and, as such, Galic should have entered them into the record: *They were dispositive to key elements of the case—namely showing mens rea on the part of the bank, Paul Shelton, and Joseph Younes.*** For details of the break-in, please refer to the 11/16/2015 “MOTION FILED,” by “MOORE ROBERT” (sic: misspelling, and should read: Robert J. More). Mr. More claims 'trespass on the case' by the bank, which broke in, and did not get investigated by the police, because (according to Daniggelis), the police viewed the illegal break & entry as a “civil” matter (which it is not: breaking & entering is criminal in nature).

Daniggelis also told me that Judge Sconza, on one occasion, would not let him defend against this mortgage fraud without an attorney, but refused to provide a court-appointed attorney. He reports that all contemporary witnesses to that exchange said that had Daniggelis not been allowed to represent himself (which is his right) he would have lost his house right then & there, meaning that, while I believe the judge may have had good motives in insisting Daniggelis be quiet until he got a lawyer, nonetheless, this implicated Procedural Due Process, and biases the courts against those who are too poor to afford an attorney.

One more fact needs to be added: I recall Mr. Daniggelis telling me that Judge Otto said, in open court, that he (Daniggelis) was at the closing, but not at the deposition. Mr. Daniggelis said that this was **backwards**: that he *was* at the deposition, but **not** at the closing, and did not even know about it. I include this recollection because Atty. Galic has the transcripts of what Judge Otto said, and other records of attendance can check Judge Otto's accuracy, and, since it's possible that Judge Otto got these key facts “wrong,” this is clear reversible error. In Otto's defense, I recall Daniggelis telling me that Younes lied about some aspect of his attendance at the closing, either that Daniggelis supposedly claimed his back hurt and to proceed without him, or that he did, in fact attend. [I urge The Court to question Daniggelis on this, and other, points, as both lawyers and judges have told him to be quiet – to be seen & not heard.]

Looking at my notes, taken when speaking to Mr. Daniggelis, I now recall one thing that he claims that Judge Sanjay T. Tailor (who preceded Judge Diane M. Shelley on this case) told Atty. Galic: When Galic was having trouble deposing John LaRouche (who kept evading the deposition), Daniggelis said that Tailor suggested to Galic to use subpoenas, instead. I'm not sure what was meant, but Mr. Daniggelis wanted This Court to know about it because, according to him, his lawyer was negligent in refusing Judge Tailor's offer. [Daniggelis thinks that Younes didn't bring “his own money” to the closing, relying instead on LaRouche, and that this is violation of some law. I don't know what the law here it, but mention is because it may be of relevance later.] More importantly, though, LaRochce or others may know who executed the forgery.

I am almost finished with the “updates” to this Statement of Case/Facts, as stated in my prior Affidavit. (I was going to get this statement notarised, like the last one, but due to the holidays and other factors, I will have to submit a “regular” brief this time. But I trust **This Court** still gives my assertions full weight & credit.) So, in conclusion, I am appending my prior filings with new developments of fact & new arguments at law.

#### IV. Argument

The legal arguments contained in the 09/14/2015 “*AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS*,” filed in the above-captioned case, are incorporated by reference herein as if fully set forth herein. **New developments raise newly-discovered legal arguments—as follows:**

First, given the gravity of the situation (felony forgery, committed against an elderly victim, destruction of

a house worth almost a million dollars—in the historic district—coupled with repeated failures of the system, letting it “slip through the cracks,” so to speak), it is appropriate to briefly recap the prior arguments:

In my prior *Amicus* brief in this case (09/14/2015), Arg.IV.A. (Photocopied (forged) signature), I prove what others merely alleged: While Benji Philips (Daniggelis' other attorney) did raise the issue of a “Whiteout,” that proves nothing: Anyone can make a mistake, and what's what Whiteout is used for.

**This point is so important, I will “camp out” here for just a moment:** When I tell “ordinary Joe's” (e.g., non-attorneys and people who don't know about this case) the example of “what if you saw your driver's license signature” and then saw your signature on something else—but EXACTLY the same as on your driver's license, what might we conclude? ANSWER: All respondents to my question rightly concluded that someone would've had to have photocopied their signature, since no mere mortal can sign his/her name exactly the same twice in a row. (Had the handwriting merely been 'similar,' then, yes, we might need a “handwriting expert,” but here, beyond all reasonable doubt, this was a forgery by photocopying a prior signature of Daniggelis, when a prior deal fell through because Daniggelis was wise enough to put in place side-agreements that protected him.) Thus, forgery, which has no statutes of limitations, was conclusively proved to have been done, and subpoenas & depositions (which previously did not address this point) are in order—so that witnesses may turn on one another, and the truth may come out. **This fact alone proves fraud!**

Arg.IV.C (Lack of consideration (payment)) gives compelling proof that Daniggelis would not just “hand over” his property (as was alleged). (Moreover, even were he to do so, no contract is valid without consideration, e.g., payment.) **This fact alone proves that Daniggelis had no motive to 'sign over' his house & property as alleged, thereby showing fraud!** And, in case anyone doubts, Arg.IV.D. Proves this: There is **no record of payment. Period. Equals: fraud!**

Arg.IV.G. (Forged POA (Power of Attorney)) shows, in the exhibits, 2 versions of the POA, one notarised & one not. While Daniggelis did sign this, nonetheless, notarising a document “after the fact,” as here, shows *mens rea*, Criminal Intent. **However, Daniggelis brought to my attention one key element that I'd overlooked in my last *Amicus* brief:** He told me that the fact that he admits to signing this POA would make it look like he really did sign over his house (which is not true). **So, I will address that here:** Yes, Daniggelis signed this POA, but first off, the record shows he had several side agreements that limited the parameters, meaning that the house could not just get transferred over. In case you don't “get” this argument, I'll spell it out for you: We see that Paul Shelton (who got disbarred over another mortgage fraud case) & Joseph Younes (who is likely to get disbarred in like manner) did not transfer title on that first signature, which is proof of the existence of the side-agreements, OK? So, that deal “fell through,” and Younes was getting greedy. So, what did he do? Well, as shown above, there was a forgery (via photocopy) of Daniggelis' signature, and then Judge Michael F. Otto, eventually, approved the 'sale,' lifting the 'cloud' on the title, caused by the affidavit Daniggelis executed of the forgery. [I put 'sale' in quotes, as no sale occurred.] I respectfully move This Court for clarification as to why Judge Otto's order is legal and just.

#### **The “Batmobile” Argument**

Younes might assert that he did not know that there was a forgery (and this might have been true, in the past). Indeed, looking at the email exchange between myself and Asst. State's Attorney, Thomas Simpson [see: Exhibit-G], Simpson clearly tells me that he doesn't know who did the forgery, and that this is the reason he can't prosecute. But is this really so?

Indeed, as the record shows, Younes was put on notice of this photocopy forgery fraud (a felony with NO statutes of limitation, e.g., a 'serious' felony!) by virtue of both the court docs I filed, as well as that which his office signed for and received. [See e.g., **Exhibit-B and Exhibit-C, where Younes feigns ignorance, and I catch him in several lies –including this one –in my exchanges with the IARDC.**]

That would be like some 17-year-old kid stealing The Batmobile from a museum, and selling it to a stranger, on the street, for a few hundred dollars: Everyone knows the Batmobile belongs in a museum (or, in the Bat Cave, with Batman!), and does not belong to some 'ordinary Joe,' OK? Thus, the poor bloke who tries to tell Police that he bought the Batmobile, and is unable to tell who sold it to him would **\*\*still\*\*** get arrested for “Dealing in Stolen Property,” ok?

Likewise, while we may not know (right now) who effected the photocopy forgery of Daniggelis' signature, we do know that it was a forgery—and now, so does Younes. So, like the poor bloke who 'bought' the Batmobile, and plead ignorance, Younes, too, is guilty of **\*\*KNOWINGLY\*\*** dealing in stolen property, and being part-and-party to the use of the forgery, which, again, has no statutes of limitations = equals = jail time for Mr. Younes if the States' Attorney supervisors (with whom I am in communication) accept my legal arguments and overrule Asst. State Atty. Thomas Simpson's decision to not prosecute.

It is, however, of no small moment that Asst. State Atty. Simpson admitted in a recent email exchange that he agreed with me, and believed that a crime had been committed. He is, I believe, honest, and wants to do the right thing. (How many others will have their houses stolen? This must stop!) However, Simpson is afraid, since one “bad ruling” (by Judge Otto) caused a domino effect, and put all others in fear of doing the right thing. Other arguments (Subrogation, Linda Green robo-signing, conflict of interest, res adjudicata, etc.) were raised by myself and Galic in prior filings, and will not be repeated here for the sake of brevity.

However, here is one thing that has not been mentioned at all, so I will mention it: Looking at the complaint that Joseph Younes filed with the Illinois Attorney General [see: **Exhibit-D**], we see he complains about supposed conspiracy between banks and title companies, regarding the robo-signing fraud, OK? However, what does Younes do? He continues the transaction with said entities, and benefits from the transaction in question: Even if there was no robo-signing conspiracy, Younes admits as much, and then participates (and benefits from) said conspiracy, so he is admitting (by his actions, which speak louder than words) of his guilt.

Lastly, while I am not wont to take a swipe at a judge (it would be unprofessional, and morally wrong, no matter how much I disagree with a ruling), I must state, for the record, that Judge Michael F, Otto committed (whether intentionally or not, I do not know) a very serious libel, when, in his recent ruling, he said that I was bragging that it would be OK to use vexatious litigant tactics. His exact words: “The argument that all strangers to a case should be allowed to engage in the tactics of a vexatious litigant are so unpersuasive as to require no further discussion.” (OTTO order, dated Dec. 07, 2015, in case 07-CH-29738, in other words, the Chancery case that was transferred to the Law Division.) **That is false:** If you look within the 'four corners' of my various pleadings before Judge Otto's court, the only things I said about vexatious litigants was the fact that my friend, Robert J. More (who is a named party, in this above-captioned case) was labeled as a vexatious litigant, by this court (and other courts), and that I noted that Mr. More's filings got into the record, and I told the court that since I was **\*\*not\*\*** a vexatious litigant, and had followed the rules, I expected it would be only right to treat me as well. (I did **\*\*not\*\*** ever threaten to use vexatious litigant tactics, nor do I condone or tacitly support such. Otto was wrong in his off-colour comment, which is sad: Other than that comment – and several obviously very bad rulings he made against myself and Daniggelis – Judge Otto showed himself to be a very bright jurist, insofar as gave excellent attention to both fact and law, and did so in a timely manner—more than I can say about some judges, who flatly ignored similar pleadings, and whom I shall not name, in this venue, out of

professional respect.)

### CONCLUSION:

**Looking at Exhibit-E**, the only exhibit I did not mention above, I see that Daniggelis files this pleading before the Appeals Court, when his lawyer, Atty. Galic, went out of the country, let both appeals get dismissed for want (lack) of prosecution, and then took no action to ask the court to prevent his house from being destroyed by Younes. This is impressive for a non-attorney to do (and looking closely at it, I see similarities in some things I've filed, which showed that Mr. Daniggelis was paying attention to details!).

However, at the end of the day, he is not an attorney, and he should not be required to do "attorney things," just to get a fair day in court. Judge Otto's comments about Daniggelis being "doggedly represented" by Galic & Philips, and how these attorneys "filed voluminous motions," in his 10/29/2015 "MOTION TO – DENIED" on the Chancery Docket of this case, are a misrepresentation of the facts: Daniggelis got mediocre, not 'doggedly' representation at best, and then got very obviously unfair rulings, not supported by law.

When Galic filed a motion before Tailor, asking my Amicus brief to be stricken, this was a clear sign that he was intimidated by the court: In other cases, where I've filed Amicus briefs, no lawyer on my side has ever had a problem with my support, so the problem is clearly with Galic's fear of the court—some of which I think is founded.

Galic has dropped the ball too many times to be trusted to represent Daniggelis all by himself, but Galic is still useful, and Daniggelis and I both hope Galic will continue to offer help, as needed. My pleadings, alone, should be sufficient to prove a forgery occurred, but the only way that This Court can get to the bottom of this debacle would be to depose everybody about that matter, and issue bench warrants for those who might abscond (like John LaRoche is doing). That Judge Tailor did not issue a bench warrant or other subpoenas is disquieting. However, I ask: Is the court up to squeezing the truth out of "the players" who were involved in this forgery—getting them to testify against one another, until the truth comes out?

Please take note of my motion for rehearing (dated 11/30/2015 on the docket). Looking at it, I now see that that I was wrong about the telephonic conference rule: It is optional, not mandatory. Since I am willing to admit wrong, This Court should know that I am not above admitting wrong on the forgery and fraud issues, here. But, if I am wrong, The Court will have to show me; otherwise, an unjust ruling is allowed to stand. **The conclusion of the whole matter is this: Chancery transferred the case to Law, and with all appeals dismissed for want of prosecution, The Law Division has full, complete, and plenary jurisdiction on the merits of the case, and can correct reversible error. Is the court up to the task of deposing all witnesses to actually get to the bottom of this mess & learn the Truth?**

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

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "**Second AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS,**" and its exhibits were delivered to the following parties as indicated – this Monday, the 17<sup>th</sup> day of April 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.] Diane.Shelley@CookCountyIL.gov ; ccc.LawCalendarW@CookcountyIL.gov

(312) 603-5940, (312) 603-7551, (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.),

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)

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>



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.

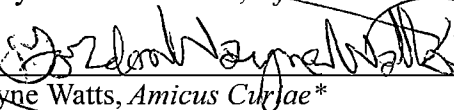
I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above “Second AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS,” and its exhibits, were served upon all parties listed above, this 17th day of April, 2017 by the following methods:

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

Monday, 17 April 2017

Gordon Wayne Watts, *Amicus Curiae*\*

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880

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: Monday, 17 January 2017

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

## INDEX TO THE EXHIBITS

<u>Instrument</u>	<u>Docket/Tab#</u>
<b>Both police reports</b>	<b>Exhibit-A</b>
29 October 2013 [Report #: HW512419] that bank employees broke locks, 25 September 2009 [Report #: HR563391] that Mortgage Fraud [financial exploit of Elderly] 23 April 2003 [Report #: HJ319798] unrelated report that was included in FOIA request	
<b>IARDC complaint, dated 08 October 2015</b>	<b>Exhibit-B</b>
<b>IARDC complaint, dated 30 April 2016</b>	<b>Exhibit-C</b>
<b>Note to Richard Daniggelis, dated 16 April 2017</b>	<b>Exhibit-D</b>
Besides commentary/discussion, this note contains 5 documents: 1. Lawsuit against Younes filed: Bank America NA filed Contract complaint on: 07-03-2012 2. Younes complaints to OAG about Linda Green conspiracy: Feb 06, 2013 3. Sweet Loan Mod: US Bank & Younes: Sept 11, 2013 (pages 8-9) or Oct 15, 2013 (page 10) 4. Lawsuit against Younes dropped: Dismiss by stipulation or agreement: 10-23-2013 5. Judge Otto rules in favour of Younes: May 15, 2014	
<b>Richard's Emergency motion and ORDER</b>	<b>Exhibit-E</b>
<b>Two key rulings directed at Atty. Andjelko Galic</b>	<b>Exhibit-F</b>
<b>Email exchange with Cook County State's Attorney Office</b>	<b>Exhibit-G</b>
(Note: I may print out only the first seven pages of this as my exhibit, for the sake of brevity, but the PDF file, when I serve it 'electronically,' is a 23-page document. Whether or not I include all 23 pages in the attachment will be dependent on things like printing costs, but I will serve the parties the same thing that I serve the court, in any case, so as to not effect bad service.)	



Exhibit A

Rahm Emanuel  
Mayor

Department of Police - City of Chicago  
3510 S. Michigan Avenue - Chicago, Illinois 60653

Eddie T. Johnson  
Superintendent

June 7, 2016

SENT VIA EMAIL:Gww1210@aol.com

Gordon Wayne Watts  
The Resgister  
821 Alicia Road, Lakeland, FL 33801-2113

Re: **NOTICE OF RESPONSE TO FOIA REQUEST**  
**REQUEST DATE: May 31, 2016**  
**FOIA FILE NO.: P048099**

Dear Mr. Watts:

The Chicago Police Department (CPD) is in receipt of your Freedom of Information Act (FOIA) requesting: "Specifically, I request any and all police reports filled my one Richard B. Daniggelis, who, of recent, used to live at 1720 North Sedgwick St. (Old Town District), Chicago, IL 60614. It is my understanding that he filed this in the 18<sup>th</sup> District, so I'm attempting to include them in the cc line here. (NOTE: His name is occasionally misspelled, say, with one 'g' or two 'small 'L's, but the above is the correct spelling: He is approximately 77-years-old, just to be clear on making sure you get the right person, should there be a question.)

Your request was reviewed by the undersigned. On June 3, 2016 CPD sought a timely extension. It is determined that your request is granted. Enclosed are the police reports. However, please be aware that certain information has been redacted from the reports pursuant to 5 ILCS 140/7(1)(b) and (d). The redactions made are pursuant to the FOIA, which exempts the following from disclosure:

5 ILCS 140/7 (1)(b) Private information, unless disclosure is required by another provision of this Act, a State or federal law or a court order

The information that was redacted were employee identification numbers, passwords, social security numbers, home addresses and driver's license numbers. The redacted information is exempt from disclosure under 5 ILCS 140/7(1)(b) of the Freedom of Information Act, which exempts "private information, unless disclosure is required by another provision of this Act, a State or federal law or court order." "Private information" is defined in section 2(c-5) as "unique identifiers, including a person's social security number, driver's license number, employee identification number, biometric identifiers, personal financial information, passwords or other access codes, medical records, home or personal telephone numbers, and personal email addresses."

Second, the names addresses and other information that could be used to identify the victim and /or witnesses, or others who provided information to the police have been redacted. The redacted information is exempt from disclosure under 5 ILCS 140/7(1)(d)(iv), which enables a public body to redact information that would 'unavoidably disclose the identity of a confidential source, confidential information furnished only by the confidential source, or who files complaints with or provide information to administrative, investigative law enforcement, or penal agencies; except that the identities of witnesses to traffic accidents, traffic accident

reports, and rescue reports shall be provided by agencies of local government, except when disclosure would interfere with an active criminal investigation conducted by the agency that is the recipient of the request"

If I can be of further assistance, you may contact me at (312)745-5308, or by mail at the below address:

Chicago Police Department  
3510 S. Michigan  
Chicago, IL 60653

Sincerely,

P.O.C Baker#8176

Freedom of Information Officer  
Chicago Police Department  
Office of Legal Affairs

You have a right of review by the Illinois Attorney General's Public Access Counselor (PAC). You can file a request for review by writing to:

Public Access Counselor  
Office of the Attorney General  
500 S. 2nd Street  
Springfield, Illinois 62706  
Phone: 312-814-5526 or 1-877-299-FOIA (1-877-299-3642)  
Fax: 217-782-1396 E-mail: [publicaccess@atg.state.il.us](mailto:publicaccess@atg.state.il.us)

If you choose to file a Request for Review with the PAC, you must do so within 60 calendar days of the date of this denial letter. 5 ILCS 140-9.5(a). When filing a Request for Review, you must include a copy of the original FOIA request and this denial letter. You may also seek judicial review of a denial under 5 ILCS 140/11 by filing a lawsuit in the State Circuit Court.

CHICAGO POLICE DEPARTMENT  
ORIGINAL CASE INCIDENT REPORT

3510 S. Michigan Avenue, Chicago, Illinois 60653  
(For use by Chicago Police Department Personnel Only)  
CPD-11.308(6/03)-C)

RD #: **HW512419**

EVENT #: **1330210807**

Case ID: **9369005 CASR229**

ASSIGNED TO FIELD

IUCR: **5081 - Non-Criminal - Other Non-Criminal Property**

Occurrence Location: **Chicago IL 60614  
290 - Residence**

Beat: **1813**

Unit Assigned: **1813**

RO Arrival Date: **29 October 2013 18:10**

Occurrence Date: **29 October 2013 14:00**

VICTIM - Individual

Name: [REDACTED]

Res: [REDACTED]

Beat: **1813**

PHYSICAL DATA

Male  
White  
5'08,  
160 lbs  
Grey/Part Grey Hair  
Short Hair Style  
Ruddy Complexion

DOB: [REDACTED] **1980**  
Age: **32 Years**

Chicago, IL 60614  
Retired

Sobriety: **Sober**

MISCELLANEOUS

Victim Information Provided

Flash Message Sent ? **No**

PROPERTY

Quantity: **1**  
Type: **Structures-Other  
Commercial/Business**

Estimated Value: **\$587840.00**

Used as Weapon? **No**

Description: **Store Front Property With  
Apartment Above**

Owner: **Richard Daniggelis**

Taken/Stolen? **No**

Recovered? **No**

Serial #: [REDACTED]

Seized? **Yes**

Damaged? **No**

HW512419

Chicago Police Department - Incident Report

RD #: HW512419

Request Type	Unit	Agency Name	Date	Star #	Name
Notification	606	Central Investigations Division	29 October 2013 20:55	21412	,COFFEE

EVENT# 1330210807, IN SUMMARY: [REDACTED] S (VICTIM) A SENIOR CITIZEN STATED TO R/O THAT WHILE UPSTAIRS IN HIS RESIDENCE HE HEARD SOMEONE KNOCK ON HIS SECOND FLOOR DOOR [REDACTED] (VICTIM) THEN DISCOVERED TWO UNKNOWN MALES ON THE FIRST FLOOR OF HIS RESIDENCE, AND OBSERVED HIS DOORLOCK LYING DAMAGED ON THE FLOOR. [REDACTED] S (VICTIM) ASKED SUBJECTS " WHO ARE YOU ?, WHERE ARE YOU FROM ?, WHO DO YOU WORK FOR ? ." SUBJECT NUMBER ONE STATED/ANSWERED THAT " I AM A SUBCONTRACTOR FOR THE BANK, I WORK FOR SAFEGUARD, WE ARE JUST DOING WHAT WE ARE TOLD ." SUBJECTS THEN ENTERED A BLACK PICKUP TRUCK ILLINOIS LICENSE NUMBER [REDACTED], AND DROVE AWAY. [REDACTED] (VICTIM) THEN DISCOVERED THAT HIS FRONT DOORLOCK HAD BEEN CHANGED. PROPERTY PIN# IS [REDACTED] COOK COUNTY RECORDER OF DEEDS PROPERTY SEARCH SHOWED A ( RELEASE ) WAS FILED ON 22 OCTOBER 2013 DOCKET NUMBER 13295480086 AND FIRST GRANTOR BEING ST CHARLES BANK AND TRUST FIRST GRANTEE BEING [REDACTED], AND FIRST PRIOR DOCKET NUMBER BEING 92193968. [REDACTED] (VICTIM) DESCRIBED SUBJECT #1 AS M/1,507, STOCKY BUILD, BLK HAIR, BRN EYES, RED SHIRT, NFI. SUBJECT NUMBER #2 WAS DESCRIBED AS M/1, TALLER, THINNER, DARKER THAN THE FIRST GUY, BLK HAT W/BILL, BLK HAIR. COPIES FAXED TO FINANCIAL CRIMES UNIT.  
- STAR#: 2689 NAME: CHERI ADRIAN BEAT: 1810

	Star No	Emp No	Name	User	Date	Unit	Beat
Approving Supervisor	1818	[REDACTED]	HAGEN, Gail, J	[REDACTED]	29 Oct 2013 21:10	018	
Detective/Investigator	21144	[REDACTED]	TAPIA, Daniel, V	[REDACTED]	30 Oct 2013 07:40	610	
Reporting Officer	11102	[REDACTED]	CLENNA, Kevin, C	[REDACTED] 03)	29 Oct 2013 20:59	019	1813



**BASE SUPPLEMENTARY REPORT**

110 S. Michigan Avenue, Chicago, Illinois 60653  
 For use by Chicago Police - Bureau of Investigative Services Personnel Only

**HW512419**

Case Id : 9369085  
 Sup Id : 10298370 CASR339

**METHOD/CAU CODE**

**DETECTIVE SUP. APPROVAL COMPLETE**

Last Offense Classification/Re-Classification <b>NON-CRIMINAL / Other Non-Criminal Property</b>		IUCR Code <b>5081</b>	Original Offense Classification <b>NON-CRIMINAL / Other Non-Criminal Property</b>			IUCR Code <b>5081</b>
Address of Occurrence [REDACTED]		Beat of Occur <b>1813</b>	No of Victims <b>1</b>	No of Offenders <b>0</b>	No of Arrested <b>0</b>	SCR No
Location Type <b>Residence</b>		Location Code <b>290</b>	Secondary Location			Hate Crime <b>No</b>
Date of Occurrence <b>19-OCT-2013 14:00</b>		Unit Assigned <b>1813</b>	Date RO Arrived <b>29-OCT-2013 18:10</b>	Fire Related? <b>NO</b>	Gang Related? <b>NO</b>	Domestic Related? <b>NO</b>

Reporting Officer <b>HARTMANN, Robert</b>	Star No <b>20499</b>	Approving Supervisor <b>HARTMANN, Robert</b>	Star No <b>20499</b>	Primary Detective Assigned <b>TAPIA, Daniel</b>	Star No <b>21144</b>
Date Submitted <b>30-OCT-2013 07:40</b>	Date Approved <b>30-OCT-2013 07:41</b>		Assignment Type <b>FIELD</b>		

**THIS IS A FIELD INVESTIGATION METHOD/CAU CODE REPORT**

**VICTIM(S):**

[REDACTED]  
 Male / White / 32 Years  
 DOB: [REDACTED] -1980  
 RES: [REDACTED] St  
 [REDACTED]

**TYPE: Individual**

**DESCRIPTION:** 5'08,160,Grey/Part Grey Hair, Short Hair Style Ruddy Complexion  
**EMPLOYMENT:** Retired

**SOBRIETY:** Sober

**BUS:** [REDACTED]  
 Chicago IL 60614

**OTHER PROPERTY:**

Evidence  
**PROPERTY TYPE:** STRUCTURES-OTHER COMMERCIAL/BUSINES

Store Front Property With Apartment Above

**SERIAL:** [REDACTED]

**OWNER:** [REDACTED]

**POSSESSOR/USER:** [REDACTED]

**VALUE AT:** \$587,840.00

**QUANTITY:** 1

This Property was Seized

[REDACTED]  
 [REDACTED]

290 - Residence

**HW512419**

**IDENTIFICATION OF IDENT:**

[REDACTED]

DATE & TIME OF INCIDENT: 29-OCT-2013 14:00

METHOD CODE(S): Dna

CAU CODE(S): Dna

PERSONNEL ASSIGNED: Detective/Investigator

TAPIA, Daniel V # 21144

Reporting Officer

CLENNA, Kevin C # 11102

BEAT: 1813

CRIME CODE SUMMARY: 5081 - Non-Criminal - Other Non-Criminal Property

INCIDENT NOTIFICATION: NOTIFICATION DATE & TIME: 10/29/2013:205500

REQUEST TYPE: Notification

PERSON NAME: ,Coffee

STAR #: 21412

REPORT DISTRIBUTIONS: No Distribution



# CASE SUPPLEMENTARY REPORT

1510 S. Michigan Avenue, Chicago, Illinois 60653  
 For use by Chicago Police - Bureau of Investigative Services Personnel Only

**HW512419**

Case id: 9369085  
 Sup ID: 10322668 CASR301

**SUSPENDED**

**DETECTIVE SUP. APPROVAL COMPLETE**

Last Offense Classification/Re-Classification <b>NON-CRIMINAL / Other Non-Criminal Property</b>		IUCR Code <b>5081</b>	Original Offense Classification <b>NON-CRIMINAL / Other Non-Criminal Property</b>			IUCR Code <b>5081</b>
Address of Occurrence [REDACTED]		Beat of Occur <b>1813</b>	No of Victims <b>1</b>	No of Offenders <b>0</b>	No of Arrested <b>0</b>	SCR No
Location Type <b>Residence</b>		Location Code <b>290</b>	Secondary Location			Hate Crime? <b>NO</b>
Date of Occurrence <b>29-OCT-2013 14:00</b>		Unit Assigned <b>1813</b>	Date RO Arrived <b>29-OCT-2013 18:10</b>	Fire Related? <b>NO</b>	Gang Related? <b>NO</b>	Domestic Related? <b>NO</b>

Reporting Officer <b>TAPIA, Daniel</b>	Star No <b>21144</b>	Approving Supervisor <b>PANOSH, Edward</b>	Star No <b>1074</b>	Primary Detective Assigned <b>TAPIA, Daniel</b>	Star No <b>21144</b>
Date Submitted <b>14-NOV-2013 21:44</b>		Date Approved <b>16-NOV-2013 15:17</b>		Assignment Type <b>FIELD</b>	

**THIS IS A FIELD INVESTIGATION SUSPENDED REPORT**

**VICTIM(S) :**

[REDACTED] d      **TYPE: Individual**

Male / White / 32 Years

DOB: [REDACTED] 1980

RES: [REDACTED]

DESCRIPTION: 5'08,160,Grey/Part Grey Hair, Short Hair Style, Ruddy Complexion

EMPLOYMENT: Retired

SOBRIETY: Sober

BUS: [REDACTED]

**OTHER PROPERTY :**

Store Front Property With Apartment Above

PROPERTY TYPE: Structures-Other Commercial/Business

SERIAL #: [REDACTED]

OWNER: [REDACTED]

POSSESSOR/USER: [REDACTED]

VALUED AT: \$587,840.00

QUANTITY: 1

This Property was Seized

**LOCATION OF INCIDENT:**

[REDACTED]

**DATE & TIME OF INCIDENT:**

29-OCT-2013 14:00

**METHOD CODE(S):**

DNA

**HW512419**

CAU CODE(S): DNA

PERSONNEL ASSIGNED: Detective/Investigator  
TAPIA, Daniel V # 21144  
Reporting Officer  
CLENNA, Kevin C # 11102 BEAT: 1813

CRIME CODE SUMMARY: 5081 - Non-Criminal - Other Non-Criminal Property

UCR ASSOCIATIONS: 5081 - Non-Criminal - Other Non-Criminal Property  
UNDETERMINED (Suspect)  
[REDACTED] (Victim)

INCIDENT NOTIFICATIONS: NOTIFICATION DATE & TIME: 10/29/2013:205500  
REQUEST TYPE: Notification  
PERSON NAME: ,Coffee  
STAR #: 21412  
EMP #:

REPORT DISTRIBUTIONS: No Distribution

**INVESTIGATION:**

THIS IS A SUSPENDED CASE REPORT

R/D was assigned this report through RBT command and should be read in conjunction with all other reports submitted under this RD number.

R/D attempted to contact complainant on 14-NOV-2013 @ 2142 regarding the changing of locks on complainant's residence. COGR was not clear if the incident had any criminal intent without speaking with complainant. R/D sent correspondence to complainant with information on how to contact R/D regarding their case.

R/D recommends this case be suspended pending information to further the case.

CHICAGO POLICE DEPARTMENT  
ORIGINAL CASE INCIDENT REPORT

3510 S. Michigan Avenue, Chicago, Illinois 60653  
(For use by Chicago Police Department Personnel Only)  
CPD-11.308(6/03)-C

RD #: **HR563391**  
EVENT #: **0927302357**  
Case ID: 7154384 CASR229

ASSIGNED TO FIELD

IUCR: 1195 - Deceptive Practice - Finan Exploit-Elderly/Disabled

Occurrence Location: Chicago IL 60614  
290 - Residence  
Beat: 1813

Unit Assigned: 9189  
RO Arrival Date: 30 September 2009 05:45  
# Offenders: 1

Occurrence Date: 25 September 2009 10:00 - 25 September 2009 10:30

VICTIM INFORMATION

Name: [REDACTED]  
Res: [REDACTED]  
Beat: 1813  
Beat: 5100  
Sobriety: Sober

Sex: Male  
Race: White  
Age: 70 Years

SUSPECT INFORMATION

Name: [REDACTED]  
Res: [REDACTED]  
Beat: 3100

Sex: Male  
Race: White  
Age: 55 years

RELATIONSHIP

(Victim) [REDACTED] is a Employer of (Offender) [REDACTED]

MISC INFORMATION

Victim Information Provided  
Flash Message Sent ? No

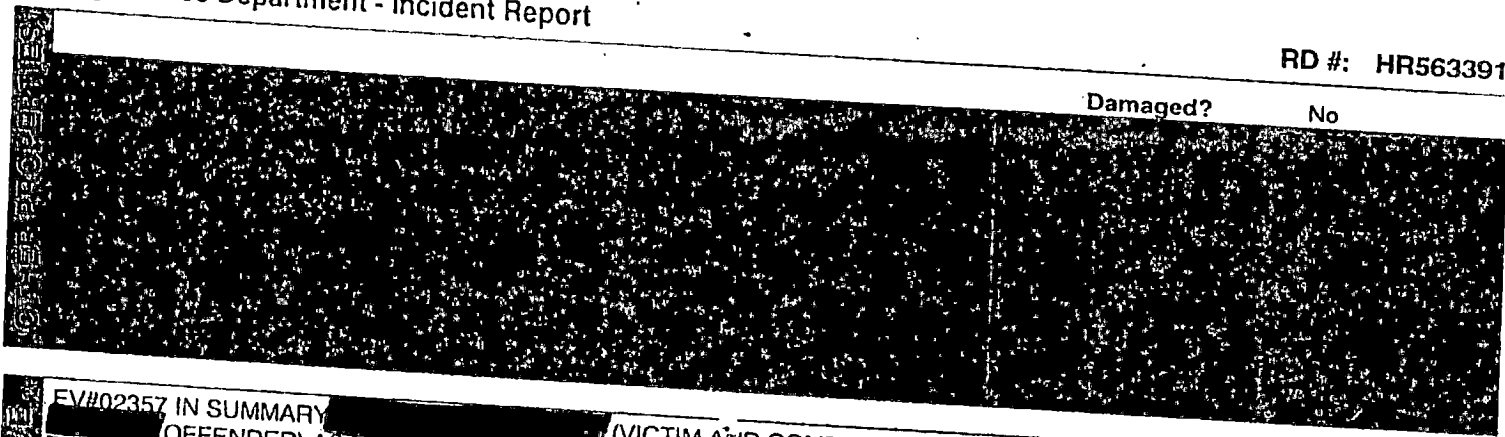
PROPERTY

Quantity: 1  
Type: Structures-Single Occupancy Dwellings  
Description: Townhouse  
Owner: Richard Daniggelis  
Used as Weapon? No  
Taken/Stolen? Yes  
Recovered? No

Generated By: [REDACTED]

RD: HR563391

Damaged? No



EV#02357 IN SUMMARY [REDACTED] (OFFENDER) AS HIS ATTORNEY TO REFINANCE AND [REDACTED] (VICTIM AND COMPLAINANT) STATES THAT HE HIRED [REDACTED] (OFFENDER) HAS PUT THE PROPERTY IN HIS NAME. [REDACTED] (VICTIM AND COMPLAINANT) HAS JUST LEARNED [REDACTED]

	Star No	Emp No	Name	User	Date	Unit	Beat
Detective/Investigator	20402	[REDACTED]	MOORE, Tracy, R	[REDACTED]	30 Sep 2009 08:19	630	
Reporting Officer	16862	[REDACTED]	YAMICH, Ernest, R	[REDACTED] 29)	30 Sep 2009 06:54	376	9189



# ASE SUPPLEMENTARY REPORT

10 S. Michigan Avenue, Chicago, Illinois 60653  
 Use by Chicago Police - Bureau of Investigative Services Personnel Only

**HR563391**

Case id : 7154384  
 Sup id : 7646806 CASR339

## METHOD/CAU CODE

**DETECTIVE SUP. APPROVAL COMPLETE**

1st Offense Classification/Re-Classification		IUCR Code	Original Offense Classification			IUCR Code
DECEPTIVE PRACTICE / Finan Exploit- Elderly/Disabled		1195	DECEPTIVE PRACTICE / Finan Exploit- Elderly/Disabled			1195
Address of Occurrence		Beat of Occur	No of Victims	No of Offenders	No of Arrested	SCR No
[REDACTED]		1813	1	1	0	
Location Type		Location Code	Secondary Location			Hate Crime
Residence		.290				No
Date of Occurrence		Unit Assigned	Date RO Arrived	Fire Related?	Gang Related?	Domestic Related?
5-SEP-2009 10:00 - 25-SEP-2009 10:30		9189	30-SEP-2009 05:45	NO	NO	NO

Reporting Officer	Star No	Approving Supervisor	Star No	Primary Detective Assigned	Star No
RILEY, Mary	20765	RILEY, Mary	20765	MOORE, Tracy	20402
Date Submitted	Date Approved		Assignment Type		
5-SEP-2009 08:19	30-SEP-2009 08:20		FIELD		

### THIS IS A FIELD INVESTIGATION METHOD/CAU CODE REPORT

**ACTIM(S):** [REDACTED]  
 Male / White / 70 Years  
**RES:** [REDACTED] St

**TYPE: Individual**

**SOBRIETY:** Sober

**SUSPECT(S)** [REDACTED]  
 Male / White / 55 Years  
**RES:** [REDACTED]

**RELATIONSHIP OF VICTIM TO OFFENDER:**

- Employer

**LOCATION OF INCIDENT:** [REDACTED]  
 290 - Residence

**DATE & TIME OF INCIDENT:** 25-SEP-2009 10:00 - 25-SEP-2009 10:30

**METHOD CODE(S):** Dna

**OFFENSE CODE(S):** Dna

**PROPERTY TYPE:** STRUCTURES-SINGLE OCCUPANCY DWELLINGS

**PROPERTY TYPE:** Townhouse

**OWNER:** [REDACTED]

**HR563391**

POSSESSOR/USER: [REDACTED]

QUANTITY: 1

PERSONNEL  
ASSIGNED:

Detective/Investigator

MOORE, Tracy R

# 20402

CRIME CODE  
SUMMARY:

1195 - Deceptive Practice - Finan Exploit-Elderly/Disabled

UCR ASSOCIATIONS:

1195 - Deceptive Practice - Finan Exploit-Elderly/Disabled

[REDACTED]

( Victim )

( Suspect )

REPORT DISTRIBUTIONS:

No Distribution

**ADDITIONAL SUPPLEMENTARY REPORT**

510 S. Michigan Avenue, Chicago, Illinois 60653  
(For use by Chicago Police - Bureau of Investigative Services Personnel Only)

**HJ319798**

Case Id : 2702490  
Sup ID : 2301638 CASR301

**CLOSED NON-CRIMINAL**

**DETECTIVE SUP. APPROVAL COMPLETE**

Last Offense Classification/Re-Classification <b>NON-CRIMINAL / Missing Person</b>		IUCR Code <b>6050</b>	Original Offense Classification <b>NON-CRIMINAL / Missing Person</b>			IUCR Code <b>6050</b>
Address of Occurrence [REDACTED]		Beat of Occur <b>1813</b>	No of Victims <b>0</b>	No of Offenders <b>0</b>	No of Arrested <b>0</b>	SCR No
Location Type <b>Residence</b>		Location Code <b>290</b>	Secondary Location			Hate Crime? <b>NO</b>
Date of Occurrence <b>23-APR-2003 20:00</b>		Unit Assigned <b>1813</b>	Date RO Arrived <b>24-APR-2003 07:50</b>	Fire Related? <b>NO</b>	Gang Related? <b>NO</b>	Domestic Related? <b>NO</b>
Reporting Officer <b>DEBARTOLO, John</b>	Star No <b>40046</b>	Approving Supervisor <b>RIZZO, Tony</b>	Star No <b>2136</b>	Primary Detective Assigned <b>DEBARTOLO, John</b>	Star No <b>40046</b>	
Date Submitted <b>13-MAY-2003 14:50</b>	Date Approved <b>03-MAY-2003 17:39</b>		Assignment Type <b>FIELD</b>			

**THIS IS A FIELD INVESTIGATION CLOSED NON-CRIMINAL REPORT**

**COMPLAINANT(S) :**

**RES:** [REDACTED]

**RELATIONSHIP TO SUBJECT:**  
**BROTHER/SISTER**

**SUBJECT(S) :**

[REDACTED]

**Male / White / 64 Years**

**DOB:** [REDACTED] **1938**

**RES:** [REDACTED]

**BIRTH PL:** Illinois

**DESCRIPTION:** 6'01,195,Medium Build, Brown Hair, Medium Hair Style, Brown Eyes, Medium Complexion

**ADDITIONAL DESCRIPTIONS:**

**WEARING:** Dark Pants

**ABNORMALITIES:** [REDACTED]

**EMPLOYMENT:** Security Office Building S/W Corner Jackson Franklin Part TIME

**SSN:** [REDACTED]

Subject , fingerprints available

**MISSING PERSON ADDITIONAL INFO:**

**MISSING PERSON AFFILIATIONS:**

**Last Seen By**  
Complainant,Unknown

**Hobby/Pastime**  
Movies Health Seminars,Unknown

**HJ319798**

**VEHICLE INFO:**

Automobile, 1979 / Chevrolet / Unknown / Sedan, 4-Door  
YEAR (RANGE): 1979

COLOR (TOP/BOTTOM): Brown /  
IDENTIFICATION MARKS: Junky Looking  
PROPERTY TYPE: Other  
LICENSE: [REDACTED]

**LOCATION OF INCIDENT:**

[REDACTED]  
290 - Residence

**DATE & TIME OF INCIDENT:**

23-APR-2003 20:00

**METHOD CODE(S):**

DNA

**CAU CODE(S):**

DNA

**NOTIFICATIONS:**

Area Notification Made To

ROSS, Marilyn A

Notification Made By

DREW, Michael J

BEAT: 1813

Notification Made To

TERRY, Secdonia

Return Notification Made By

DEBARTOLO, John A

BEAT: 7313

Return Notification Made To

WILLIAMS, Michael D

# 14872

**PERSONNEL ASSIGNED:**

Detective/Investigator

DEBARTOLO, John A

Hot Desk Entered By

TERRY, Secdonia

Leads/Ncic Entered By

TERRY, Secdonia

Reporting Officer

DREW, Michael J

BEAT: 1813

**OTHER INDIVIDUALS  
INVOLVED:**

[REDACTED]

Male

( Person Interviewed  
Non-Witness )

RES: [REDACTED]  
Chicago IL

EMPLOYMENT: CoInplainant/Brother Of Missing

**TIME CODE SUMMARY:**

6050 - Non-Criminal - Missing Person

**SOCIATION :**

LAST SEEN BY  
COMPLAINANT  
UNKNOWN



HOBBY/PASTIME  
MOVIES HEALTH SEMINARS  
UNKNOWN

REPORT DISTRIBUTIONS: No Distribution

**INVESTIGATION:**

CLOSED NON-CRIMINAL SUPPLEMENT CASE REPORT

-----  
NOTIFICATIONS: WC Unit 630

INVESTIGATION: The R/Inv learned from the complainant [REDACTED] that the missing, [REDACTED], his brother has been located and returned home. Due to these facts of this investigation requires no further police action.

As of this report a check with CHRIS revealed the missing was not the victim or offender of a crime.

6. EVER MISSING BEFORE  YES  NO HOW MANY TIMES: WHEN (DATE) OVER 20 23 APR 03 2000 1813 1813 7. DATE REPTG. OFFICER ARRIVED - TIME 24 APR. 03 075

8. NAME  CORRECTION B M 9. SEX/RACE/AGE DATE OF BIRTH 10. PLACE OF BIRTH 11. SOCIAL SECURITY NO. 12. HOME PHONE

13. MAIDEN NAME - NICKNAME - ALIAS - AKA None 14. HOME ADDRESS 15. BUSINESS PHONE None

16. HEIGHT 6'1 17. WEIGHT 195 18. BUILD Med 19. COLOR OR HAIR - HOW WORN Brn Med/Los Brn 20. EYES Brn 21. COMPLEXION Med 22. SKIN DISORDERS None 23. SCARS - TATTOOS (DESCRIBE) None

24. FACIAL HAIR  SIDEBURNS  MUSTACHE None 25. MEDICAL/PHYSICAL ABNORMALITIES (DESCRIBE) 26. UNUSUAL MENTAL STATE Normal 27. CONDITION WHEN LAST SEEN:  HOD  OTHER (DESCRIBE)  NARCOTICS Normal

28. DESCRIBE ALL CLOTHING WORN (HAT, COAT, JACKET, SHIRT, PANTS, SHOES, ETC.) DRK. PANTS, (N.F.D.) 29. IF CARRIED BY SUBJECT: DESCRIBE JEWELRY, LUGGAGE, MONEY UNK

30. VEH. USED BY SUBJECT 79 Chevy 4dr. Brn 31. PERSONAL HABITS  USES NARCOTICS  OTHER  DRINKS  GAMBLES 32. INTERESTS 33. HOBBIES/PASTIMES Movies, Health Seminars 34. OTHER UNUSUAL HABITS Junky looking

35. OCCUPATION  FULL TIME  PART TIME Security 36. WHERE EMPLOYED (FIRM NAME, ADDRESS) Office Bldg. - SW corner Jackson & Franklin 37. STUDENT  YES  NO 38. OTHER OCCUPATIONS (DESCRIBE) DNA 39. RELIGIOUS AFFILIATIONS (UNCL. CULTS, SECTS, ETC.) 40. ATTENDING (NAME OF CHURCH/TEMPLE) ADDRESS

41. MEMBERSHIPS (CLUBS, GANGS, ORGANIZATIONS, ETC.) 42. PLACES FREQUENTED ("HANG-OUTS") - NAME & ADDRESS None 43. CLOSE FRIENDS/ASSOCIATES - NAME, AKA, ADDRESS UNK 44. WITH WHO/ABY WHOM WAS SUBJECT LAST SEEN (if different explain in Narrative) Complainant 45. SUBJECT MISSING FROM (ADDRESS) None

46. COMPLAINANT - NAME Relationship - Brother 47. AVAILABLE PHOTOGRAPHS  YES  NO DENTAL RECORDS  YES  NO MEDICAL RECORDS  YES  NO FINGERPRINTS  YES  NO 48. FINGERPRINT CLASSIFICATION 49. DRIVERS LICENSE NO., STATE I.D. NO., OR OTHER IDENTIFYING DOCUMENT D5240 UNK

49. TYPE OF LOCATION/REMISES WHERE OCCURRED OR SUBJECT FOUND 50. SUBJECT'S CONDITION 51. CAUSE OF INJURY (INSTRUMENTS/MEANS) 52. REASON (ACCIDENT, ILL HEALTH, ETC.) 53. REMOVED BY 54. REMOVED TO 55. PERSON NOTIFIED TERRI # 11448 TIME 0840 56. NOTIFICATION MADE BY R/O STAR NO. 13167 57. FLASH MESSAGE SENT  YES  NO - C.O.S. NO. DATE

58. STATUS (CHECK ONE)  SUSPENDED  PROGRESS  CLOSED - NON-CRIMINAL 59. C.F. NO./D. NO./D.A. NO. UNIT 60. DATE OF EMANCIPATION (IF ANY) 61. CORRECTIONS - LIST BOX NOS.

62. N.C.D. LEADS REQUIRED INFORMATION

THE PERSON DESCRIBED ABOVE IS MISSING  IF THE MISSING PERSON IS LOCATED BEYOND CITY LIMITS, I (COMPLAINANT) AGREE TO ARRANGE FOR HIS RETURN TRANSPORTATION AT MY COST. CHECK IF APPLICABLE  USABILITY  ENDANGERED  JUVENILE  INVOLUNTARY

I CONFIRM THE ABOVE INFORMATION IS CORRECT TO THE BEST OF MY KNOWLEDGE. COMPLAINANT'S SIGNATURE [Redacted] DATE 24 Apr 03

63. REPORTING OFFICER (PRINT) M. DREW STAR NO. 13167 OFFICER'S SIGNATURE [Redacted] EXTRA COPIES REQUIRED Normal  CONTINUED ON REVERSE SIDE

64. SUPERVISOR'S SIGNATURE (PRINT) [Redacted] STAR NO. [Redacted] APPROVAL SIGNATURE [Redacted] DATE INVEST. COMPLETED 24 APR. 03 0840 TIME

DATE APPROVED 24 APR 03 1000 TIME

CPD-11407 (Rev 11/90) MISSING/FOUND PERSON CASE REPORT DIVISION FOLLOW-UP

66. RD NO HJ319798

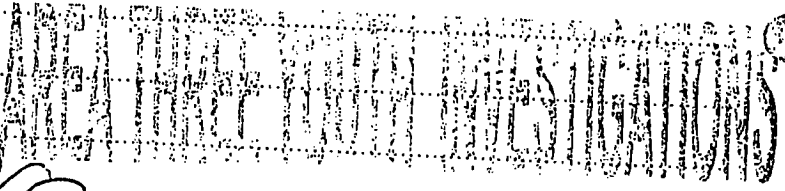
Event # 03096

In Summary: Complainant stated that it is very unlike his brother to not come home at night; in fact it has never occurred before.

The missing subject left to go to a "health-seminar, somewhere out West," at approx. 2000 hrs (23 Apr 03) and there has been no contact from him since that time.

The complainant (missing subject's brother) had stayed overnight at subject's home and will be staying there until he hears news about his missing brother.

There are no working telephones at either the complainant's or the missing's home.



I HAVE READ THIS REPORT AND BY MY SIGNATURE INDICATE THAT IT IS ACCEPTABLE

SUPERVISOR SIGNATURE

STAR NO.

DATE (DAY-MO-YR.)

FOR USE BY BUREAU OF INVESTIGATIVE SERVICES ONLY

OFFENSE CODE <input type="checkbox"/> 1 CORRECT <input type="checkbox"/> REVISED	REV. CODE	UNIT NO.	OFF. ASSIGNED STAR	DATE ASSIGNED	<input type="checkbox"/> ADULT <input type="checkbox"/> RETURNED <input type="checkbox"/> LOCATED	STATUS <input type="checkbox"/> CLOSED - <input type="checkbox"/> NON CRIMINAL
--	-----------	----------	-----------------------	---------------	---	--

IM IDENTIFIERS CORRECT <input type="checkbox"/> 2 REV.	REV. NAME	REV. PHONE NO.	<input type="checkbox"/> HOME <input type="checkbox"/> BUS
---	-----------	----------------	---

ADDRESS	VERIFICATION - NAME	DATE - TIME	RELATIONSHIP
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FIELD CONTROL DESK	NAME - STAR NO.	DATE - TIME	REMARKS
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REPORTED BY - SIGNATURE	STAR NO.	DATE (DAY-MO-YR.)	APPROVED BY - SIGNATURE	STAR NO.	DATE (DAY-MO-YR.)
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RD NO  
HT 319798



Exhibit A

Rahm Emanuel  
Mayor

Department of Police - City of Chicago  
3510 S. Michigan Avenue - Chicago, Illinois 60653

Eddie T. Johnson  
Superintendent

June 7, 2016

SENT VIA EMAIL:Gww1210@aol.com

Gordon Wayne Watts  
The Resgister  
821 Alicia Road, Lakeland, FL 33801-2113

Re: **NOTICE OF RESPONSE TO FOIA REQUEST**  
**REQUEST DATE: May 31, 2016**  
**FOIA FILE NO.: P048099**

Dear Mr. Watts:

The Chicago Police Department (CPD) is in receipt of your Freedom of Information Act (FOIA) requesting: "Specifically, I request any and all police reports filled my one Richard B. Daniggelis, who, of recent, used to live at 1720 North Sedgwick St. (Old Town District), Chicago, IL 60614. It is my understanding that he filed this in the 18<sup>th</sup> District, so I'm attempting to include them in the cc line here. (NOTE: His name is occasionally misspelled, say, with one 'g' or two 'small 'L's, but the above is the correct spelling: He is approximately 77-years-old, just to be clear on making sure you get the right person, should there be a question.)

Your request was reviewed by the undersigned. On June 3, 2016 CPD sought a timely extension. It is determined that your request is granted. Enclosed are the police reports. However, please be aware that certain information has been redacted from the reports pursuant to 5 ILCS 140/7(1)(b) and (d). The redactions made are pursuant to the FOIA, which exempts the following from disclosure:

5 ILCS 140/7 (1)(b) Private information, unless disclosure is required by another provision of this Act, a State or federal law or a court order

The information that was redacted were employee identification numbers, passwords, social security numbers, home addresses and driver's license numbers. The redacted information is exempt from disclosure under 5 ILCS 140/7(1)(b) of the Freedom of Information Act, which exempts "private information, unless disclosure is required by another provision of this Act, a State or federal law or court order." "Private information" is defined in section 2(c-5) as "unique identifiers, including a person's social security number, driver's license number, employee identification number, biometric identifiers, personal financial information, passwords or other access codes, medical records, home or personal telephone numbers, and personal email addresses."

Second, the names addresses and other information that could be used to identify the victim and /or witnesses, or others who provided information to the police have been redacted. The redacted information is exempt from disclosure under 5 ILCS 140/7(1)(d)(iv), which enables a public body to redact information that would 'unavoidably disclose the identity of a confidential source, confidential information furnished only by the confidential source, or who files complaints with or provide information to administrative, investigative law enforcement, or penal agencies; except that the identities of witnesses to traffic accidents, traffic accident

reports, and rescue reports shall be provided by agencies of local government, except when disclosure would interfere with an active criminal investigation conducted by the agency that is the recipient of the request"

If I can be of further assistance, you may contact me at (312)745-5308, or by mail at the below address:

Chicago Police Department  
3510 S. Michigan  
Chicago, IL 60653

Sincerely,

P.O.C Baker#8176  
Freedom of Information Officer  
Chicago Police Department  
Office of Legal Affairs

You have a right of review by the Illinois Attorney General's Public Access Counselor (PAC). You can file a request for review by writing to:

Public Access Counselor  
Office of the Attorney General  
500 S. 2nd Street  
Springfield, Illinois 62706  
Phone: 312-814-5526 or 1-877-299-FOIA (1-877-299-3642)  
Fax: 217-782-1396 E-mail: [publicaccess@atg.state.il.us](mailto:publicaccess@atg.state.il.us)

If you choose to file a Request for Review with the PAC, you must do so within 60 calendar days of the date of this denial letter. 5 ILCS 140-9.5(a). When filing a Request for Review, you must include a copy of the original FOIA request and this denial letter. You may also seek judicial review of a denial under 5 ILCS 140/11 by filing a lawsuit in the State Circuit Court.

CHICAGO POLICE DEPARTMENT  
ORIGINAL CASE INCIDENT REPORT

3510 S. Michigan Avenue, Chicago, Illinois 60653  
(For use by Chicago Police Department Personnel Only)  
CPD-11.388(6/03)-C)

RD #: HW512419

EVENT #: 1330210807

Case ID: 9369085 CASR229

ASSIGNED TO FIELD

IUCR: 5081 - Non-Criminal - Other Non-Criminal Property

Occurrence Location: [REDACTED]  
Chicago IL 60614  
290 - Residence

Beat: 1813

Unit Assigned: 1813

RO Arrival Date: 29 October 2013 18:10

Occurrence Date: 29 October 2013 14:00

VICTIM - Individual

Name: [REDACTED]

Res: [REDACTED]  
[REDACTED]

Beat: 1813

DOB: [REDACTED] 1980  
Age: 32 Years  
Male  
White  
5'08,  
160 lbs  
Grey/Part Grey Hair  
Short Hair Style  
Ruddy Complexion

Chicago, IL 60614  
Retired

Beat: 1813

Sobriety: Sober

Miscellaneous

Victim Information Provided

Flash Message Sent ? No

PROPERTY

Quantity: 1  
Type: Structures-Other  
Commercial/Business

Estimated Value: \$587840.00

Used as Weapon? No

Description: Store Front Property With  
Apartment Above

Taken/Stolen? No

Owner: Richard Daniggelis

Recovered? No

Serial #: [REDACTED]

Seized? Yes

Damaged? No

RD: HW512419

Chicago Police Department - Incident Report

RD #: HW512419

Request Type	Unit	Agency Name	Date	Star #	Name
Notification	606	Central Investigations Division	29 October 2013 20:55	21412	,COFFEE

EVENT# 1330210807, IN SUMMARY: [REDACTED] S (VICTIM) A SENIOR CITIZEN STATED TO R/O THAT WHILE UPSTAIRS IN HIS RESIDENCE HE HEARD SOMEONE KNOCK ON HIS SECOND FLOOR DOOR [REDACTED] (VICTIM) THEN DISCOVERED TWO UNKNOWN MALES ON THE FIRST FLOOR OF HIS RESIDENCE, AND OBSERVED HIS DOORLOCK LYING DAMAGED ON THE FLOOR. [REDACTED] S (VICTIM) ASKED SUBJECTS " WHO ARE YOU ?, WHERE ARE YOU FROM ?, WHO DO YOU WORK FOR? ." SUBJECT NUMBER ONE STATED/ANSWERED THAT " I AM A SUBCONTRACTOR FOR THE BANK, I WORK FOR SAFEGUARD, WE ARE JUST DOING WHAT WE ARE TOLD." SUBJECTS THEN ENTERED A BLACK PICKUP TRUCK ILLINOIS LICENSE NUMBER [REDACTED], AND DROVE AWAY. [REDACTED] (VICTIM) THEN DISCOVERED THAT HIS FRONT DOORLOCK HAD BEEN CHANGED. PROPERTY PIN# IS [REDACTED] COOK COUNTY RECORDER OF DEEDS PROPERTY SEARCH SHOWED A ( RELEASE) WAS FILED ON 22 OCTOBER 2013 DOCKET NUMBER 13295480086 AND FIRST GRANTOR BEING ST CHARLES BANK AND TRUST, FIRST GRANTEE BEING [REDACTED], AND FIRST PRIOR DOCKET NUMBER BEING 92193968 [REDACTED] (VICTIM) DESCRIBED SUBJECT #1 AS M/1,507, STOCKY BUILD, BLK HAIR, BRN EYES, RED SHIRT, NFI. SUBJECT NUMBER #2 WAS DESCRIBED AS M/1, TALLER, THINNER, DARKER THAN THE FIRST GUY, BLK HAT W/BILL, BLK HAIR. COPIES FAXED TO FINANCIAL CRIMES UNIT.  
 - STAR#: 2689 NAME: CHERI ADRIAN BEAT: 1810

	Star No	Emp No	Name	User	Date	Unit	Beat
Approving Supervisor	1818	[REDACTED]	HAGEN, Gail, J	[REDACTED]	29 Oct 2013 21:10	018	
Detective/Investigator	21144	[REDACTED]	TAPIA, Daniel, V	[REDACTED]	30 Oct 2013 07:40	610	
Reporting Officer	11102	[REDACTED]	CLENNA, Kevin, C	[REDACTED]	29 Oct 2013 20:59	019	1813



**CASE SUPPLEMENTARY REPORT**

110 S. Michigan Avenue, Chicago, Illinois 60653  
 (For use by Chicago Police - Bureau of Investigative Services Personnel Only)

**HW512419**

Case Id : 9369085  
 Sup Id : 10298370 CASR339

<b>METHOD/CAU CODE</b>		<b>DETECTIVE SUP. APPROVAL COMPLETE</b>			
Original Offense Classification/Re-Classification	IUCR Code	Original Offense Classification			IUCR Code
NON-CRIMINAL / Other Non-Criminal Property	5081	NON-CRIMINAL / Other Non-Criminal Property			5081
Address of Occurrence	Beat of Occur	No of Victims	No of Offenders	No of Arrested	SCR No
[REDACTED]	1813	1	0	0	
Location Type	Location Code	Secondary Location			Hate Crime
Residence	290				No
Date of Occurrence	Unit Assigned	Date RO Arrived	Fire Related?	Gang Related?	Domestic Related?
19-OCT-2013 14:00	1813	29-OCT-2013 18:10	NO	NO	NO
Reporting Officer	Star No	Approving Supervisor	Star No	Primary Detective Assigned	Star No
HARTMANN, Robert	20499	HARTMANN, Robert	20499	TAPIA, Daniel	21144
Date Submitted	Date Approved	Assignment Type			
10-OCT-2013 07:40	30-OCT-2013 07:41	FIELD			

**THIS IS A FIELD INVESTIGATION METHOD/CAU CODE REPORT**

**VICTIM(S):**

[REDACTED]  
 Male / White / 32 Years  
 DOB: [REDACTED] -1980  
 RES: [REDACTED] St  
 [REDACTED]

**TYPE: Individual**

**DESCRIPTION:** 5'08,160,Grey/Part Grey Hair, Short Hair Style Ruddy Complexion  
**EMPLOYMENT:** Retired

**SOBRIETY:** Sober  
**BUS:** [REDACTED]  
 Chicago IL 60614

**OTHER PROPERTY:**

Evidence  
**PROPERTY TYPE:** STRUCTURES-OTHER COMMERCIAL/BUSINES  
 Store Front Property With Apartment Above  
**SERIAL:** [REDACTED]  
**OWNER:** [REDACTED]  
**POSSESSOR/USER:** [REDACTED]  
**VALUE AT:** \$587,840.00  
**QUANTITY:** 1  
 This Property was Seized  
 [REDACTED]  
 [REDACTED]  
 290 - Residence

**HW512419**

**IDENTIFICATION OF:**  
**IDENT:**

[REDACTED]



DATE & TIME OF INCIDENT: 29-OCT-2013 14:00

METHOD CODE(S): Dna

CAU CODE(S): Dna

PERSONNEL ASSIGNED: Detective/Investigator

TAPIA, Daniel V # 21144

Reporting Officer

CLENNA, Kevin C # 11102

BEAT: 1813

CRIME CODE SUMMARY: 5081 - Non-Criminal - Other Non-Criminal Property

INCIDENT NOTIFICATION: NOTIFICATION DATE & TIME: 10/29/2013:205500

REQUEST TYPE: Notification

PERSON NAME: ,Coffee

STAR #: 21412

REPORT DISTRIBUTIONS: No Distribution

# CASE SUPPLEMENTARY REPORT

510 S. Michigan Avenue, Chicago, Illinois 60653  
 For use by Chicago Police - Bureau of Investigative Services Personnel Only)

**HW512419**

Case id: 9369085  
 Sup ID: 10322668 CASR301

**SUSPENDED**

**DETECTIVE SUP. APPROVAL COMPLETE**

Last Offense Classification/Re-Classification		IUCR Code	Original Offense Classification			IUCR Code
NON-CRIMINAL / Other Non-Criminal Property		5081	NON-CRIMINAL / Other Non-Criminal Property			5081
Address of Occurrence		Beat of Occur	No of Victims	No of Offenders	No of Arrested	SCR No
[REDACTED]		1813	1	0	0	
Location Type		Location Code	Secondary Location			Hate Crime?
Residence		290				NO
Date of Occurrence		Unit Assigned	Date RO Arrived	Fire Related?	Gang Related?	Domestic Related?
29-OCT-2013 14:00		1813	29-OCT-2013 18:10	NO	NO	NO

Reporting Officer	Star No	Approving Supervisor	Star No	Primary Detective Assigned	Star No
TAPIA, Daniel	21144	PANOSH, Edward	1074	TAPIA, Daniel	21144
Date Submitted	Date Approved		Assignment Type		
14-NOV-2013 21:44	16-NOV-2013 15:17		FIELD		

**THIS IS A FIELD INVESTIGATION SUSPENDED REPORT**

**VICTIM(S) :**

[REDACTED] **TYPE: Individual**

Male / White / 32 Years

DOB: [REDACTED] 1980

RES: [REDACTED]

DESCRIPTION: 5'08,160,Grey/Part Grey Hair, Short Hair Style, Ruddy Complexion

EMPLOYMENT: Retired

SOBRIETY: Sober

BUS: [REDACTED]

**OTHER PROPERTY :**

Store Front Property With Apartment Above

PROPERTY TYPE: Structures-Other Commercial/Business

SERIAL #: [REDACTED]

OWNER: [REDACTED]

POSSESSOR/USER: [REDACTED]

VALUED AT: \$587,840.00

QUANTITY: 1

This Property was Seized

**LOCATION OF INCIDENT:**

[REDACTED]

**DATE & TIME OF INCIDENT:**

29-OCT-2013 14:00

**METHOD CODE(S):**

DNA

**HW512419**

CAU CODE(S):

DNA

PERSONNEL ASSIGNED:

Detective/Investigator

TAPIA, Daniel V

# 21144

Reporting Officer

CLENNA, Kevin C

# 11102

BEAT: 1813

CRIME CODE SUMMARY:

5081 - Non-Criminal - Other Non-Criminal Property

ICR ASSOCIATIONS:

5081 - Non-Criminal - Other Non-Criminal Property

UNDETERMINED

( Suspect )  
( Victim )

INCIDENT NOTIFICATIONS:

NOTIFICATION DATE & TIME: 10/29/2013:205500

REQUEST TYPE: Notification

PERSON NAME: ,Coffee

STAR #: 21412

EMP #:

REPORT DISTRIBUTIONS:

No Distribution

INVESTIGATION:

THIS IS A SUSPENDED CASE REPORT

R/D was assigned this report through RBT command and should be read in conjunction with all other reports submitted under this RD number.

R/D attempted to contact complainant on 14-NOV-2013 @ 2142 regarding the changing of locks on complainant's residence. COGR was not clear if the incident had any criminal intent without speaking with complainant. R/D sent correspondence to complainant with information on how to contact R/D regarding their case.

R/D recommends this case be suspended pending information to further the case.

ORIGINAL CASE INCIDENT REPORT

3510 S. Michigan Avenue, Chicago, Illinois 60653  
(For use by Chicago Police Department Personnel Only)  
CPD-11.388(6/03)-C

RD #: **HR563391**

EVENT #: **0927302357**

Case ID: **7154384 CASR229**

ASSIGNED TO FIELD

IUCR: **1195 - Deceptive Practice - Finan Exploit-Elderly/Disabled**

Occurrence Location: **Chicago IL 60614**  
**290 - Residence** Beat: **1813**

Unit Assigned: **9189**  
RO Arrival Date: **30 September 2009 05:45**

Occurrence Date: **25 September 2009 10:00 - 25 September 2009 10:30**

# Offenders: **1**

MICRO INFORMATION

Name: [REDACTED]  
Res: [REDACTED] Beat: **1813**

Sex: **Male**  
Race: **White** Age: **70 Years**

Sobriety: **Sober** Beat: **5100**

SUSPECT

Name: [REDACTED]  
Res: [REDACTED] Beat: **3100**

Sex: **Male**  
Race: **White** Age: **55 years**

RELATIONSHIP

(Victim) [REDACTED] is a **Employer of** (Offender) [REDACTED]

Miscellaneous

Victim Information Provided

Flash Message Sent ? **No**

PROPERTY

Quantity: **1**  
Type: **Structures-Single Occupancy Dwellings**

Used as Weapon? **No**  
Taken/Stolen? **Yes**

Description: **Townhouse** Owner: **Richard Daniggelis**

Recovered? **No**

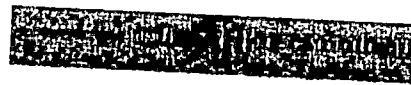
Generated By: [REDACTED]

RD # HR563391

Damaged? No

EV#02357 IN SUMMARY [REDACTED] (OFFENDER) AS HIS ATTORNEY TO REFINANCE AND [REDACTED] (VICTIM AND COMPLAINANT) STATES THAT HE HIRED [REDACTED] JUST LEARNED [REDACTED] (OFFENDER) HAS PUT THE PROPERTY IN HIS NAME. [REDACTED] (VICTIM AND COMPLAINANT) HAS

	Star No	Emp No	Name	User	Date	Unit	Beat
Detective/Investigator	20402	[REDACTED]	MOORE, Tracy, R	[REDACTED]	30 Sep 2009 08:19	630	
Reporting Officer	16862	[REDACTED]	YAMICH, Ernest, R	[REDACTED] 29)	30 Sep 2009 06:54	376	9189



# BASE SUPPLEMENTARY REPORT

10 S. Michigan Avenue, Chicago, Illinois 60653  
Use by Chicago Police - Bureau of Investigative Services Personnel Only

**HR563391**

Case id : 7154384  
Sup id : 7646806 CASR339

<b>METHOD/CAU CODE</b>		<b>DETECTIVE SUP. APPROVAL COMPLETE</b>			
Original Offense Classification/Re-Classification		IUCR Code	Original Offense Classification		IUCR Code
DECEPTIVE PRACTICE / Finan Exploit- Elderly/Disabled		1195	DECEPTIVE PRACTICE / Finan Exploit- Elderly/Disabled		1195
Address of Occurrence		Beat of Occur	No of Victims	No of Offenders	No of Arrested
[REDACTED]		1813	1	1	0
Location Type		Location Code	Secondary Location		Hate Crime
Residence		.290			No
Date of Occurrence		Unit Assigned	Date RO Arrived	Fire Related?	Gang Related?
5-SEP-2009 10:00 - 25-SEP-2009 10:30		9189	30-SEP-2009 05:45	NO	NO
Reporting Officer		Star No	Approving Supervisor	Star No	Primary Detective Assigned
RILEY, Mary		20765	RILEY, Mary	20765	MOORE, Tracy
Date Submitted		Date Approved		Assignment Type	
5-SEP-2009 08:19		30-SEP-2009 08:20		FIELD	

## THIS IS A FIELD INVESTIGATION METHOD/CAU CODE REPORT

**ACTIM(S):**

[REDACTED]  
Male / White / 70 Years

**TYPE: Individual**

**RES:** [REDACTED] St

**SOBRIETY:** Sober

**SUSPECT(S)**

[REDACTED]  
Male / White / 55 Years

**RES:** [REDACTED]

**RELATIONSHIP OF VICTIM TO OFFENDER:**

[REDACTED] - Employer

**LOCATION OF INCIDENT:**

[REDACTED]  
290 - Residence

**DATE & TIME OF INCIDENT:**

25-SEP-2009 10:00 - 25-SEP-2009 10:30

**METHOD CODE(S):**

Dna

**OFFENSE CODE(S):**

Dna

**OTHER PROPERTY IDENTIFICATION:**

**PROPERTY TYPE:** STRUCTURES-SINGLE OCCUPANCY DWELLINGS

Townhouse

**OWNER:** [REDACTED]

**HR563391**

POSSESSOR/USER: [REDACTED]

QUANTITY: 1

PERSONNEL  
ASSIGNED:

Detective/Investigator

MOORE, Tracy R

# 20402

CRIME CODE  
SUMMARY:

1195 - Deceptive Practice - Finan Exploit-Elderly/Disabled

UCR ASSOCIATIONS:

1195 - Deceptive Practice - Finan Exploit-Elderly/Disabled

[REDACTED]

( Victim )

( Suspect )

REPORT DISTRIBUTIONS:

No Distribution

**BASE SUPPLEMENTARY REPORT**

510 S. Michigan Avenue, Chicago, Illinois 60653  
(for use by Chicago Police - Bureau of Investigative Services Personnel Only)

**HJ319798**

Case id : 2702490  
Sup ID : 2301838 CASR301

**CLOSED NON-CRIMINAL**

**DETECTIVE SUP. APPROVAL COMPLETE**

Last Offense Classification/Re-Classification		IUCR Code	Original Offense Classification			IUCR Code
NON-CRIMINAL / Missing Person		6050	NON-CRIMINAL / Missing Person			6050
Address of Occurrence		Beat of Occur	No of Victims	No of Offenders	No of Arrested	SCR No
[REDACTED]		1813	0	0	0	
Location Type		Location Code	Secondary Location			Hate Crime?
Residence		290				NO
Date of Occurrence		Unit Assigned	Date RO Arrived	Fire Related?	Gang Related?	Domestic Related?
23-APR-2003 20:00		1813	24-APR-2003 07:50	NO	NO	NO

Reporting Officer	Star No	Approving Supervisor	Star No	Primary Detective Assigned	Star No
DEBARTOLO, John	40046	RIZZO, Tony	2136	DEBARTOLO, John	40046
Date Submitted	Date Approved		Assignment Type		
13-MAY-2003 14:50	03-MAY-2003 17:39		FIELD		

**THIS IS A FIELD INVESTIGATION CLOSED NON-CRIMINAL REPORT**

**COMPLAINANT(S) :**

**RES:** [REDACTED]

**RELATIONSHIP TO SUBJECT:**  
BROTHER/SISTER

**SUBJECT(S) :**

Male / White / 64 Years

DOB: [REDACTED] 1938

**RES:** [REDACTED]

**BIRTH PL:** Illinois

**DESCRIPTION:** 6'01,195,Medium Build, Brown Hair, Medium Hair Style,  
Brown Eyes, Medium Complexion

**ADDITIONAL DESCRIPTIONS:**

**WEARING:** Dark Pants

**ABNORMALITIES:** [REDACTED]

**EMPLOYMENT:** Security Office Building SW Corner Jackson Franklin  
Part TIME

**SSN:** [REDACTED]

Subject , fingerprints available

**MISSING PERSON  
ADDITIONAL INFO:**

**MISSING PERSON  
AFFILIATIONS:**

Last Seen By  
Complainant,Unknown

Hobby/Pastime  
Movies Health Seminars,Unknown

**HJ319798**



**VEHICLE INFO:**

Automobile , 1979 / Chevrolet / Unknown / Sedan, 4-Door  
YEAR (RANGE): 1979

COLOR (TOP/BOTTOM): Brown /  
IDENTIFICATION MARKS: Junky Looking  
PROPERTY TYPE: Other  
LICENSE: [REDACTED]

**LOCATION OF INCIDENT:**

[REDACTED]

290 - Residence  
23-APR-2003 20:00

**DATE & TIME OF INCIDENT:**

**METHOD CODE(S):**

DNA

**CAU CODE(S):**

DNA

**NOTIFICATIONS:**

Area Notification Made To

ROSS, Marilyn A

Notification Made By

DREW, Michael J

BEAT: 1813

Notification Made To

TERRY, Secdonia

Return Notification Made By

DEBARTOLO, John A

BEAT: 7313

Return Notification Made To

WILLIAMS, Michael D

# 14872

**PERSONNEL ASSIGNED:**

Detective/Investigator

DEBARTOLO, John A

Hot Desk Entered By

TERRY, Secdonia

Leads/Ncic Entered By

TERRY, Secdonia

Reporting Officer

DREW, Michael J

BEAT: 1813

**OTHER INDIVIDUALS VOLVED:**

[REDACTED]

Male

( Person Interviewed  
Non-Witness )

RES: [REDACTED]

Chicago IL

EMPLOYMENT: Coñplainant/Brother Of Missing

**IME CODE SUMMARY:**

6050 - Non-Criminal - Missing Person

**SOCIATION :**

LAST SEEN BY  
COMPLAINANT  
UNKNOWN

HOBBY/PASTIME  
MOVIES HEALTH SEMINARS  
UNKNOWN

REPORT DISTRIBUTIONS: No Distribution

INVESTIGATION:

CLOSED NON-CRIMINAL SUPPLEMENT CASE REPORT

-----  
NOTIFICATIONS: WC Unit 630

INVESTIGATION: The R/Inv learned from the complainant [REDACTED] that the missing, [REDACTED], his brother has been located and returned home. Due to these facts of this investigation requires no further police action.

As of this report a check with CHRIS revealed the missing was not the victim or offender of a crime.

6. EVER MISSING BEFORE  YES  NO HOW MANY TIMES: WHEN (DATE) 23 APR 03 2000 1813 1813

B. NAME [REDACTED] 9. SEX/RACE/AGE: DATE OF BIRTH 10. PLACE OF BIRTH 11. SOCIAL SECURITY NO. 12. HOME PHONE

13. MAIDEN NAME: NICKNAME: ALIAS: AKA None 14. HOME ADDRESS [REDACTED] 15. BUSINESS PHONE None

16. HEIGHT: 6'1 17. WEIGHT: 195 18. BUILD: Med 19. COI OR HAIR: HOW WORN: Brn Med. Long 20. EYES: Brn 21. COMPLEXION: Med. 22. SKIN DISORDERS: None 23. SCARS - TATTOOS (DESCRIBE): None

24. FACIAL HAIR: [REDACTED] 25. MEDICAL/PHYSICAL ABNORMALITIES (DESCRIBE): [REDACTED] 26. UNUSUAL MENTAL STATE: Normal 27. CONDITION WHEN LAST SEEN: [REDACTED]

28. DESCRIBE ALL CLOTHING WORN (HAT, COAT, JACKET, SHIRT, PANTS, SHOES, ETC.): DRK. PANTS (N.F.D.) 29. IF CARRIED BY SUBJECT: DESCRIBE JEWELRY, LUGGAGE, MONEY: UNK

30. VEH. USED BY SUBJECT: 79 Chevy 4dr Brn 31. PERSONAL HABITS: [REDACTED] 32. INTERESTS: Movies, Health Seminars 33. HOBBIES/PASTIMES: [REDACTED]

34. OTHER UNUSUAL HABITS: Junky Looking 35. OCCUPATION: Security 36. WHERE EMPLOYED (FIRM NAME, ADDRESS): Office Bldg. - SW corner Jackson St. 37. STUDENT: [REDACTED]

38. OTHER OCCUPATIONS (DESCRIBE): DNA 39. RELIGIOUS AFFILIATIONS (INCL. CHURCH, SECT'S, ETC.): [REDACTED] 40. ATTENDING'S NAME OF CHURCH/TEMPLE: [REDACTED]

41. MEMBERSHIPS (CLUBS, GANGS, ORGANIZATIONS, ETC.): [REDACTED] 42. PLACES FREQUENTED ("HANG-OUTS") - NAME & ADDRESS: None 43. CLOSE FRIENDS/ASSOCIATES - NAME, AKA, ADDRESS: UNK

44. WITH WHO/WHY WAS SUBJECT LAST SEEN (if different explain in Narrative): Complainer 45. SUBJECT MISSING FROM (ADDRESS): [REDACTED]

46. COMPLAINANT - NAME: [REDACTED] RELATIONSHIP: Brother 47. AVAIL-ABLE: PHOTOGRAPHS: [REDACTED] DENTAL RECORDS: [REDACTED] MEDICAL RECORDS: [REDACTED] FINGERPRINTS: [REDACTED]

48. FINGERPRINT CLASSIFICATION: West #603 NONE 49. TYPE OF LOCATION/PREMISES WHERE OCCURRED OR SUBJECT FOUND: [REDACTED] 50. SUBJECT'S CONDITION: [REDACTED]

51. CAUSE OF INJURY (INSTRUMENTS/MEANS): [REDACTED] 52. REASON (ACCIDENT, ILL HEALTH, ETC.): [REDACTED] 53. REMOVED BY: [REDACTED] 54. REMOVED TO: [REDACTED]

55. PERSON NOTIFIED: TERRI # 11448 TIME: 0840 56. NOTIFICATION MADE BY: R/O STAR NO.: 13167 DATE: 24 APR 03

SUBJECT'S DESCRIPTION

66. RD. NO. HT319798

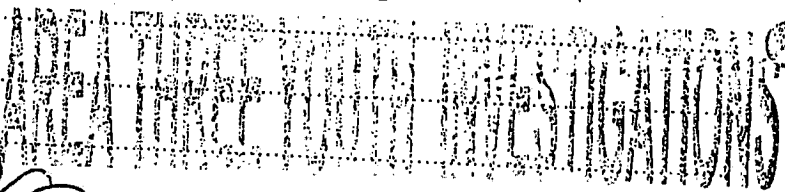
Event # 03096

In Summary: Complainant stated that it is very unlike his brother to not come home at night; in fact it has never occurred before.

The missing subject left to go to a "health-seminar, somewhere out West," at approx. 2000 hrs (23 Apr 03) and there has been no contact from him since that time.

The complainant (missing subject's brother) had stayed overnight at subject's home and will be staying there until he hears news about his missing brother.

There are no working telephones at either the complainant's or the missing's home.



I HAVE READ THIS REPORT AND BY MY SIGNATURE INDICATE THAT IT IS ACCEPTABLE  
SUPERVISOR SIGNATURE: [Redacted] STAR NO. [Redacted] DATE (DAY-MO-YR.) 24 APR 03

FOR USE BY BUREAU OF INVESTIGATIVE SERVICES ONLY

R OFFENSE CODE <input type="checkbox"/> 1 CORRECT <input type="checkbox"/> REVISED	REV. CODE	UNIT NO.	OFF. ASSIGNED STAR	DATE ASSIGNED	<input type="checkbox"/> ADULT	<input type="checkbox"/> RETURNED <input type="checkbox"/> LOCATED	STATUS <input type="checkbox"/> CLOSED - NON CRIMINAL
IM IDENTIFIERS CORRECT <input type="checkbox"/> 2 REV.	REV. NAME	ADDRESS		REV. PHONE NO.	<input type="checkbox"/> HOME <input type="checkbox"/> BUS.		

VERIFICATION - NAME	DATE - TIME	RELATIONSHIP
FIELD CONTROL DESK	NAME - STAR NO.	DATE - TIME
REMARKS		

REPORTED BY - SIGNATURE	STAR NO.	DATE (DAY-MO-YR.)	APPROVED BY - SIGNATURE	STAR NO.	DATE (DAY-MO-YR.)
-------------------------	----------	-------------------	-------------------------	----------	-------------------

RD NO. HJ319798

# E-Mail Cover Sheet

Exhibit B

***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)**

**To: Atty. Rita C. Greggio, Esq.**, Litigation Counsel c/o: Attorney Registration & Disciplinary Commission  
130 E. Randolph Dr., STE 1500  
Chicago, IL 60601  
PH: 312-540-5209  
**E-mail: [RGreggio@iarc.org](mailto:RGreggio@iarc.org)**  
**Cc's: [Information@iarc.org](mailto:Information@iarc.org), [RBader@iarc.org](mailto:RBader@iarc.org), [EAWelsh@iarc.org](mailto:EAWelsh@iarc.org), [Webmaster@iarc.org](mailto:Webmaster@iarc.org)**

**Cc: Joseph Younes Law Offices**  
<http://ChicagoAccidentAttorney.net>  
120 W Madison St Ste 1405  
Chicago, IL 60602-4128  
PH: 312-372-1122 FX: 312-372-1408  
**E-mail is: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com)** per  
<http://www.ZoomInfo.com/p/Joseph-Younes/599467626>

**Cc: Peter King** (Atty. for Joseph Younes) (Atty. No.: 48761) c/o: King Holloway LLC  
101 N. Wacker Dr., STE 2010  
Chicago, IL 60606  
Direct: (312) 724-8221  
**E-mail: [PKing@khl-law.com](mailto:PKing@khl-law.com)**

**Cc: Paul L. Shelton, Esq.**  
10 North Adams Street  
Hinsdale, IL 60521  
**E-mail: [PMSA136@aol.com](mailto:PMSA136@aol.com)**,  
per: <http://www.il-reab.com/agents/26812-paul-l-shelton-shelton-associates-hinsdale-il-60523>

**[PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net)**  
per:  
<http://www.zoominfo.com/p/Paul-Shelton/-939241>

**Cc: Paul L. Shelton, Pro Se**  
3 Grant Square, SUITE #363  
Hinsdale, IL 60521-3351  
PH: 630-842-0126 per caller ID

**Cc: KING HOLLOWAY LLC**  
(Atty. for Joseph Younes)  
[www.KingHolloway.com/contact.htm](http://www.KingHolloway.com/contact.htm)  
**Attn: Peter M. King, Esq.**  
One North LaSalle Street, Suite 3040,  
Chicago, IL 60602  
(312) 780-7302 / (312) 724-8218

**Cc: Andjelko Galic, Esq.** (Atty. No.: 33013), Atty. for Defendant, Mr. Richard B. Daniggelis, e.g., the elderly victim of the mortgage fraud rescue scheme

134 N. LaSalle St., STE 1040  
CHICAGO IL, 60602 – (Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)  
**E-mail: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com), and: [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com)**

**Date:** Thursday, 08 October 2015

**Subject:** Re: Your grievance against Illinois attorneys Shelton and Younes

**Comments:** Dear Atty. Greggio, I am in receipt of your postal mail dated Oct. 01, 2015. I received it by postal mail on Monday, 05 October 2015. Thank you for your response.

Below, in chronological order, is a record of \*all\* of our communications –with one exception –along with my response. *The exception was this:* I'm omitting my initial complaint, for the sake of brevity, but it was basically a copy of some court filings with a short note telling you that I thought that fraud was committed and needed to be looked into.

I shall attempt to 'reply to all' by both email and postal mail. *Please see below for said docs:*

Your grievance against Illinois attorneys Shelton and Younes

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

Show images & enable links

Subject: Your grievance against Illinois attorneys Shelton and Younes

Date: 8/17/2015 5:42:25 P.M. Eastern Daylight Time

From: RGreggio@iardc.org

To: Gwww1210@aol.com

Sent from the Internet (Details)

- Reply
- Forward
- Reply All
- Add Address
- Report Spam

Mr. Watts,

Am the attorney investigating your grievances against attorneys Younes and Shelton.

I attempted calling you at the numbers listed on your website but was unable to reach you. I'd like to discuss your request for investigation with you. Can you please call me at 312-540-5209, at your convenience, to discuss these matters? I am in the office Monday-Friday from 9:30 a.m. to 5:50 p.m. (central time zone).

Thank you for your anticipated cooperation.

Sincerely,

**Rita C. Greggio**

Litigation Counsel  
Attorney Registration & Disciplinary Commission  
130 E. Randolph Dr., Suite 1500  
Chicago, IL 60601  
Telephone: 312.540.5209  
rgreggio@iardc.org

Date and Time Properties

Date & Time Time Zone Internet Time

Date: September 2015

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

Time: 6:36:34 AM

Current time zone: Eastern Daylight Time

---

# Facsimile Cover Sheet

# RECEIVED

SEP 21 2015

**To:** +13125652320  
**Company:**  
**Phone:**  
**Fax:** +13125652320

ATTY. REG & DISC. COMM  
CHICAGO

**From:** Joseph Younes  
**Company:** Law Offices of Joseph Younes  
**Phone:** (855) 457-7877 \* 101  
**Fax:** (855) 601-2789

**Date:** 09/21/2015

**Pages including this  
cover page:** 4

**Comments:**

2015IN03387 (ATT: Rita Greggio)

Law Offices of Joseph Younes  
166 W. Washington St., Suite 600  
Chicago, Illinois 60602

Of Counsel  
Habib S. Younes – Deceased

(312) 372-1122  
Fax (312) 372-1408

VIA TELEFACSIMILE (312)565-2320

September 21, 2015

Rita C. Greggio  
Senior Counsel  
Attorney & Registration & Disciplinary Commission  
130 E. Randolph Dr., Suite 1500  
Chicago, Illinois 60601-6219

**RECEIVED**

SEP 21 2015

RE: No. 2015IN03387

**ATTY. REG & DISC. COMM  
CHICAGO**

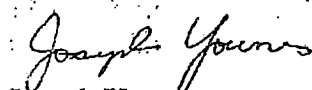
Dear Ms. Greggio:

Thank you for your letter of September 16, 2015. In response, I have no idea as to what is being claimed or investigated. At no time did I ever have any dealings with Gordon Watts. Apparently Mr. Watts has somehow attempted to embed himself in litigation involving a cloud on title on a piece of property I purchased at arm's length from Richard Daniggelis. Mr. Watts had nothing to do with the underlying transaction or the subsequent litigation, to the best of my knowledge.

On May 15, 2014, the Honorable Judge Michael F. Otto, resolved all issues between myself and the seller. A copy of the Memorandum of Judgment is attached for your review.

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,



Joseph Younes

enc.





Doc#: 1413634065 Fee: \$40.00  
RHSP Fee: \$0.00 RPPF Fee: \$1.00  
Karen A. Yarbrough  
Cook County Recorder of Deeds  
Date: 05/18/2014 02:58 PM Pg: 1 of 2

This Document Prepared By:  
Peter M. King  
King Holloway LLC  
101 N. Wacker Drive, Suite 2010  
Chicago, IL 60606

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - CHANCERY DIVISION

GMAC Mortgage, LLC, U.S. Bank National Association, a national banking association as successor trustee to Bank of America, N.A., as Trustee for Morgan Stanley Loan Trust 2006-16AX,

Plaintiff/Counter-Defendant,

vs.

RICHARD DANIGGELIS,

Defendant/Counter-Plaintiff,

JOSEPH YOUNES; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., as Nominee for HLB Mortgage; Paul Shelton, Erika Rhone and Stewart Title of Illinois and Unknown Owners,

Defendants/Counter-Defendants.

07 CH 29738

CALENDAR 61

1720 North Sedgwick Ave.,  
Chicago, Illinois

P.I.N. 14-33-324-044

MEMORANDUM OF JUDGMENT

This matter having come before the Court on Joseph Younes' Memorandum of Judgment against Richard Daniggelis, the Court having jurisdiction and being fully advised in the Premises, this Memorandum of Judgment hereby reflects as follows:

1. The property subject to the above-captioned litigation (the "Subject Property") is legally described as follows:

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

P.L.N. 14-33-324-044

Commonly Known As: 1720 N. Sedgwick St., Chicago, IL 60614

2. On or about December 3, 2009, Richard Daniggelis ("Daniggelis") filed his Third Amended Counterclaim in the above-captioned matter to quiet title against Joseph Younes ("Younes"), wherein Daniggelis asserted a claim against Younes' ownership of the Subject Property. Said claim by Daniggelis constituted a cloud on the title on the Subject Property and Younes' ownership thereof.

3. On February 15, 2013 this Court entered an Order in favor of Joseph Younes for his Motion for Summary Judgment against Richard Daniggelis and finding that Joseph Younes is sole owner of the Subject Property and that Richard Daniggelis has no interest in the Subject Property. As such, the court found that there was no cloud on the title to the Subject Property and Younes' ownership thereof.

4. On June 14, 2013 this Court denied Richard Daniggelis' Motion to Reconsider this Court's Order of February 15, 2013 in its entirety. Therefore, Daniggelis' action to quiet title against Younes is insufficient as a matter of law and dismissed with prejudice.

5. Having found that Joseph Younes is the owner of the Subject Property and that Richard Daniggelis has no interest in the Subject Property, the Fraudulent Document Notice recorded by Richard Daniggelis with the Cook County Recorder of Deeds Office on April 20, 2007 and recorded as Document Number 0622826137 is hereby cancelled and held for naught.

SIGNED:

  
Judge Michael F. Otto

Judge Michael F. Otto

MAY 15 2014

Circuit Court -- 2063

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION  
ONE PRUDENTIAL PLAZA  
130 EAST RANDOLPH DRIVE, SUITE 1500  
CHICAGO, ILLINOIS 60601-6219



02 1A  
0004635110 OCT 01 2015  
MAILED FROM ZIP CODE 60601

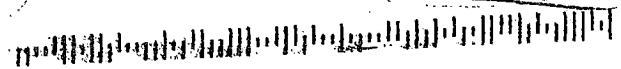
\$ 00.70<sup>5</sup>

Received in MAILBOX  
MONDAY, 05 October 2015

(312) 503-2000 (800) 820-8020  
Fax (312) 565-2320

Gordon Watts  
821 Alicia Road  
Lakeland, FL 33801-2113

3380162113 0053





ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION  
of the  
SUPREME COURT OF ILLINOIS

One Prudential Plaza  
130 East Randolph Drive, Suite 1500  
Chicago, Illinois 60601-6219  
(312) 565-2600 (800) 826-8625  
Fax (312) 565-2320

3161 West White Oaks Drive, Suite 301  
Springfield, IL 62704  
(217) 546-3523 (800) 252-8048  
Fax (217) 546-3785

Gordon Watts  
821 Alicia Road  
Lakeland, FL 33801-2113

Chicago  
October 1, 2015

Re: Paul Leslie Shelton  
in relation to  
Gordon Watts  
No. 2015IN03388

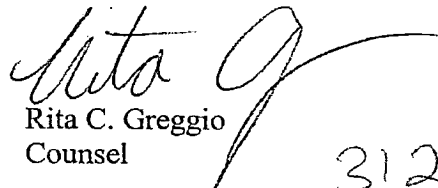
Dear Mr. Watts:

Enclosed is a copy of the response of Paul Shelton to the matters about which you have complained.

If you believe the response is inaccurate or if you wish to provide additional information or documents for our consideration, please write to me within fourteen days.

We will evaluate the matter and advise you of our decision. Again, thank you for your cooperation.

Very truly yours,

  
Rita C. Greggio  
Counsel

312-540-5209

Rita Greggio's Direct # 312-540-5209

RGreggio@IARDC.org

RCG:ce  
Enclosure  
MAINLIB #666686\_v1