



*reached the merits, chiefly because Atty. Andjelko Galic, the attorney for Richard Daniggelis, the elderly victim, who was temporarily made homeless & living in his rental van, as a result of the theft of his house/land, was negligent and never filed his merits brief; and, as a result, Galic was chewed out royally by This Honourable Court in its last substantive order. (See: Order of this court, date **June 16, 2016**, in Docket number: **1-14-2751, supra.**) This Court was permitted – but not required – to accept my *Amicus Curiae* (aka: “Friend of the Court”) briefs; and, while this court didn't break any laws in rejecting my *amicus* briefs in these appeals, above, it was an unwise refusal to 'make use' of proximal judicial help offered, since *amici* are permitted to be a “friend” to the court –and aide its appellate jurisdiction when, as in this case, counsel for both sides overlooked stuff and/or are/were negligent:*

**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, 7th. 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>

**2. Is any party a corporation or association? If so, please identify any affiliate, subsidiary, or parent group: NO**

**3.(A) Full name and complete address of appellant(s) filing this statement:**

Mr. Gordon Wayne Watts, *pro se*  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
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**3.(B) Full name and complete address of appellee(s): (Use additional page for multiple appellees.)** See the attached Service List, which includes all known parties – and their attorneys.

**3.(C) Counsel on Appeal for appellee(s): (Use additional page for multiple appellees.)**

See the attached Service List, which includes all known parties – and their attorneys.

**4. Court reporting personnel: (If more space is needed, use other side.)**

As I became a “party proper” to this case after its inception (and not merely a prospective *Amicus Curiae*, as I had initially sought), I do not rightly know, but I can tell you that I have heard a report from **Mr. Daniggelis**, who is my friend, who has told me that **Andjelko Galic, his attorney**, has hired a court reporter and has purchased records. If you want to know about any court reporting personnel, you may ask the attorneys involved in this case and/or the Civil Appeals Division of the trial court below.

**5.(A) Approximate Duration of trial court proceedings to be transcribed: Unknown**

**5.(B) Can this appeal be accelerated? Yes—on motion of the court or any party: **R.311(b)**.**

While not mandatory (e.g., as in domestic or child rearing issues), the victim of this mortgage fraud is elderly, I'm guessing about 79 or 80 years old, as I speak, and it would not serve the appellate jurisdiction of this court were it to purposely let all the elderly victims die of old age (or stress- from being made homeless) before the merits of this case could be reached. Therefore, this court would have my gratitude if it could fast track the case, review it on the merits (based solely on what I filed, *which should be enough to justify summary judgment*), and then render summary judgment in favour of **Daniggelis**, giving him back his house & land, with costs assessed for pain & suffering ; damages to his house by **Joseph Younes** (as further described in *City of Chicago v. 1720 Sedgwick, Younes, et. al., 2017-M1-400775*, a Code Violation case in the Civil Division of Cook County, IL trial courts) ; monies lost due to having to find another place to live and/or store belongings ; award for attorneys fees to his attorney, **Andjelko Galic**, – and award for monetary losses to **Watts** and **More**, who suffered various losses as a result of financial distress inflicted upon **Daniggelis** –such ruling which would moot **Daniggelis'** otherwise valid 'non-suit' motion to the trial court, which precipitated this appeal to this court, **and with remand to the Circuit Court for further proceedings consistent with this order:**

**Rule 311. Accelerated Docket**

**(b) Discretionary Acceleration of Other Appeals.** *Any* time after the docketing statement is filed in the reviewing court, the court, on its own motion, or on the motion of any party, for good cause shown, may place the case on an accelerated docket. The motion shall be supported by an affidavit stating reasons why the appeal should be expedited. If warranted by the circumstances, the court may enter an order accepting a supporting record prepared pursuant to Rule 328, consisting of those lower court pleadings, reports of proceedings or other materials that will fully present the issues. In its discretion the court may accept memoranda in lieu of formal briefs. The court may then enter an order setting forth an expedited schedule for the disposition of the appeal.

**6. Is this appeal from a final order in a matter involving child custody or allocation of parental responsibility pursuant to Illinois Supreme Court Rule 311(a) which requires Mandatory Accelerated Disposition(\*) of Child Custody or Allocation of Parental Responsibilities Appeals? NO**

(\*) If yes, this docketing statement, briefs and all other notices, motions and pleadings filed by any party shall include the following statement in bold type on the top of the front page: THIS APPEAL INVOLVES A MATTER SUBJECT TO EXPEDITED DISPOSITION UNDER RULE 311(a).

**7.(A) State the supreme court rule, or the law, which confers jurisdiction upon the reviewing court:** Ill.Sup.Ct. Rules 301 and 303 confer jurisdiction as of right for this appeal. While I was a prospective *amicus*, when previously filing in this court, I later asserted intervention in the Law Division case; and, as my name appears on docket, in the court below, this is proof of my status as a party, the court below having neither denied my motion nor given any reason to deny intervention as of right. *City of Chicago v. John Hancock Mutual Life Ins. Co., 127 Ill.App.3d 140, 144 (1st Dist. 1984).* I satisfy all 3 requirements, giving me a right to intervene under 735 ILCS 5/2-408(a)(3). Also, as I'm a food stamp recipient, I qualify for few waiver in this court –and the court below, subject to mandamus proceedings, should it balk or refuse my rights to both sue and defend in forma pauperis, as my gut feeling says it may attempt.

**7.(B) State the facts of the case, which bring it within this rule or other law; and, the date that the order being appealed was entered:** The order being appealed was on December 07, 2017. I have 30 days AFTER the entry of the order, per Rule 303(a)(1). Also, 5 ILCS 70/1.11 confirms that “The time within which any act provided by law is to be done shall be computed by excluding the first day...” and also doesn't count weekends, meaning that the 30<sup>th</sup> day, which was January 06, 2018, and fell on a Saturday, rolls over to Monday, 08 January 2018, making my appeal timely. This docketing statement is due 14-days later, e.g., by Monday, 01-22-2018.

**7.(C) State any other facts which are necessary to demonstrate that the appeal is timely:**  
Rule 373 allows the time-stamp of the post office or a 3rd-party carrier, such as UPS or FedEx, to count as the time of filing.

|                               |  |
|-------------------------------|--|
| <b>8. Nature of the Case:</b> | <u><b>Mortgage Fraud / Foreclosure</b></u>                     |
| <i>Administrative Review</i>  | <u><b>Contract</b></u> <i>Estates</i> <i>Personal Injury</i>   |
| <i>Juvenile</i>               | <i>Domestic Relations</i> <i>Child Custody or Support</i>      |
| <i>Product Liability</i>      | <u><b>Forcible Entry Detainer (FED)</b></u> <u><b>Tort</b></u> |

**9. Briefly describe the (A) nature of the case, and (B) the result in the trial court, and set forth (C) any reasons for an expedited schedule:**

**9. [A] Nature of the Case: provable 'Mortgage Fraud'**  
First off, my *Amicus Curiae* briefs, as you vividly recall, DOCUMENTED beyond any

reasonable doubt, that there was indeed provable “mortgage fraud” which ensued when **Daniggelis** attempted to merely get 'basic' help with refinancing and/or investors, via a photocopy forgery, a felony forgery fraud, and this, combined with lack of consideration (payment), especially in light of the fact that known 'mortgage fraud' artist, **Paul Shelton** (who lost a law license over this) aided **Atty. Joseph Younes**, gave damning proof of mortgage fraud.

### **9. [C] Reasons for an Expedited Schedule**

Before I go any further, let me remind you that the victim is elderly, and this, alone, is reasons enough for an expedited schedule [an R.311(b) Accelerated Docket], phone conferencing for myself (as I'm in Florida), and a summary Judgment, speedily rendering justice. This elderly man was made homeless, and was sleeping in his rental van for a spell, **and this is verified by my statement herein**, but if you doubt, you may ask Daniggelis, himself. He continues to suffer financial hardship as a result of having to find replacement housing for both himself and his belongings, which, *necessarily*, must be in storage somewhere, and thus not cost a small price.

### **9. [A] Nature of the Case: provable 'Mortgage Fraud' (continued)**

**However, since I last filed in your court**, I discovered the most unusual thing in all of mankind's history: **Judge Michael F. Otto**, the judge who forcibly stripped Daniggelis' house from him, entered an **Order dated March 08, 2013**, in which he basically admitted fraud, and made my case stronger. Direct link for convenience (but check with trial court to verify)

\* <http://GordonWatts.com/MortgageFraudCourtDocs/3-8-2013-MOTION-DENIED.pdf>

or:

\* <http://GordonWayneWatts.com/MortgageFraudCourtDocs/3-8-2013-MOTION-DENIED.pdf>

**1.** Judge Otto admits (**Order, p.4**) that the July 9, 2006 warranty deed "is in most respects identical" to the May 9, 2006 warranty deed that Daniggelis signed (except, of course, for the word 'July' being hand-written in), which supports Daniggelis claims that there was a photocopy forgery of his signature, which forgery -all by itself -would void the entire illegal transfer of title.

**2.** Judge Otto (**Order, p.3**) acknowledges (admits) that 'Exhibit L' existed, a side-agreement to limit the title transfer only for the purpose of paying the “mortgage arrearage.” Judge Otto claims that this document was not properly signed, but apparently, Otto did not see the exhibits filed in **Daniggelis' July 30, 2008 answer** (see pages 38 and 40 of the 96-page PDF file of a public records request at this link, provided by my personal repository and online docket: <http://GordonWayneWatts.com/MortgageFraudCourtDocs/07ch29738-07242015.pdf> or <http://GordonWatts.com/MortgageFraudCourtDocs/07ch29738-07242015.pdf> where both **Shelton** and **Rhone** sign on to such statements, and **Daniggelis** also signs them: These contracts place limits on **both the time and purpose** of the **POA**). So, this conclusively proves the **POA** to be **fraudulently** used, which fraud -all by itself -would void the entire illegal transfer of title. **If you can't access my website, please see contact the trial court for official records, here.**

**3.** There's **no** material disagreement with repeated assertions that **Richard Daniggelis** never got paid, which is a key proof of fraud that's being alleged by multiple parties. (Daniggelis would not simply give away the farm, for free. Moreover, even *had* he done so, Watts' case law

shows that a sale is void *ab initio* if it lacks consideration.) My filings have repeatedly accused the other parties of failing to pay Daniggelis any consideration, and **no one** has contested this claim. Per **735 ILCS 5/15-1506(a)**, that which the other parties to this case don't deny is admitted, and, as such, it's plain that **Daniggelis didn't get paid for his house**, which is documented to have had hundreds of thousands of dollars equity, and which equity (and house and land) were taken without any consideration (payment), **thus voiding any purported sale**. But even if you think my case law, here, is “outdated,” the fact Daniggelis didn't get paid shows he had NO motive to give away—for free—the house **and all its equity**, thus the transfer of title was not authorised by Daniggelis, **and is therefore NOT legal or valid. At all. Period.**

**4.** On **page 7** of Judge Otto's ORDER, he claims that the 'difficulty' for Daniggelis is that, even assuming the signature to be altered (forgery by photocopy), Otto claims that **Daniggelis** “provides no factual or legal basis support for his assertion that, assuming the signature to have been altered, the Bank therefore “knew or should have known that the deed ... was no longer valid when the closing occurred.” **This argument by Judge Otto is totally ridiculous:**

Let's say, for example, that a group of thieves steal **Daniggelis' vehicle**, and then sell it on the Black Market to a Bank (or take a loan out on it, using as collateral for a mortgage). When the police finally catch the thieves, do you *really* think, for one second, that the Bank will be allowed to keep the hot (stolen) property, simply because they didn't have “notice” that the property was stolen? Certainly not, and may God forbid! **If Otto's logic seems crazy when we use a stolen vehicle, then it's just as crazy with the stolen house.** Otto's claim that the bank needed 'notice' is ridiculous on its face, and invites the federal courts to investigate him for civil rights violations, under the color of law. However, the bank certainly *did* get notice: **Daniggelis** recording a statement of forgery in the recorder's office: Indeed, Otto admits (**Order, p.4**) that: "In April 2007, Daniggelis filed a Notice of Forgery with the Recorder of Deeds, stating that the deed filed in August 2006 [i.e., the one dated "July 9, 2006"] was a forgery." Moreover, the Bank was *also* notified of this fraud by voluminous and lengthy litigation which ensued. [Thus, **Otto's** claim that the bank wasn't notified **is contradicted by himself**, no less.] However, more-important than the fact **Otto's** claims were in **contradiction to himself** is the fact his ridiculous argument **is in direct contradiction to absolute truth and common sense**, and that this trial court judge used said 'nonsense' argument as an excuse to “rubber stamp” plain & obvious fraud. Otto further admits (**Order, p.4**) that: "**Daniggelis** contends that the deed he signed in May 2006 was intended to take effect only if the property was sold on or before May 31, 2006. He claims that the July 2006 closing took place without his awareness or consent," and the Record on Appeal clearly supports **Daniggelis'** valid claim, which **Otto** acknowledges, **but thereafter ignores.** **Judge Otto's 'arguments' (particularly, #4, supra) are totally ridiculous.**

Because numerous courts & judges repeatedly continue to ignore Jospheh Younes' clear fraud, he's been allowed to gut, damage, & destroy Daniggelis' house, as explicated in **City of Chicago v. 1720 N. Sedgwick, Joseph Younes, et. al., case number 2017-M1-400775**, in the Civil Division, a case, overseen by Judge Patrice Ball-Reed, and which case has been featured numerous times in ***DNAinfo***, my blog, ***The Register***, and more recently, ***ChicagoCityScape***: <https://blog.ChicagoCityScape.com/landmarks-commission-still-threatening-fines-if-house-in-historic-district-isnt-worked-on-once-390f052a2ab2>

**9. (B) The Result in the Trial Court(s)**

[[#1—First]] In the underlying **Chancery Division** case, which stretched on **for almost a decade**, numerous judges kept ignoring the clear fraud which I've documented above (and in **both** my filings, **and** the exhibits to said filings, which reference documentary evidence from the record). [[#2—Secondly]] Then, based on the illegal transfer of title, which was permitted by the ruling in Chancery, the **Civil Division**, in a FED (Forcible Entry Detainer aka eviction) case, kicked Daniggelis out of his own home. [[#3—Lastly]] Finally, I affirm, by means of this filing, than Daniggelis told me, on one occasion, that when all seemed lost, he jumped up in court, in Chancery, before Judge Otto, and exclaimed that if he weren't right as a matter of law, then why would Stewart Title have settled for a large sum of monies, at which time, he reported to me that Judge Otto suddenly, and unexpectedly, responded by directing that this case must be transferred to the **Law Division**, from which it is presently being appealed by the undersigned appellant. [Note: The Law Division transfer, in #3, may have happened before the Civil Division conclusion, in #2, above, but the Law division case is, indeed, the last *—and only remaining—* case – based on the underlying mortgage fraud/foreclosure issues, **common to all three (3) cases.**]

[[#4—Overtime]] Initially, there were questions about whether the **Law Division** case could over-rule the various Orders issued in the **Chancery** case, handing title to **Younes**, and, many legal scholars, even the famous Wikipedia – [https://en.wikipedia.org/wiki/Circuit\\_Court\\_of\\_Cook\\_County#Law\\_Division](https://en.wikipedia.org/wiki/Circuit_Court_of_Cook_County#Law_Division) – insisted that the Law Division could only do A-B-and-C, but no mention of vacating or over-ruling a bad Chancery ruling.

However, in spite of numerous “urban legends” that claim that **the Law Division** is unable to do anything other than limited monetary torts, the undersigned appellant did diligent research into this matter: See the “9/11/2017” motion by Defendant, Gordon Wayne Watts, filed before Hon. DIANE M. SHELLEY, in the Law Division case *sub judice*, documenting that the local rules of the Cook County circuit courts, specifically GENERAL ORDER NO. 1.2,2.1 - County Department, place **no** limitations or restriction prohibiting a Law Division judge (particularly, a senior or circuit judge, **such as Judge Shelley**) from reversing an incorrect title-transfer ruling by a Chancery Division judge (such as junior or Associate **Judge Michael F. Otto**, who entered the erroneous order in question on **May 15, 2014**, thereby proving Watts' claim that **The IL Supreme Court is correct** when it states that Circuit Judges, **such as Judge Shelley**, “can hear **any** circuit court case.” (Emphasis added for clarify) <http://www.IllinoisCourts.gov/CircuitCourt/CCInfoDefault.asp>

Source:

<http://www.CookCountyCourt.org/Manage/DivisionOrders/ViewDivisionOrder/tabid/298/ArticleId/188/GENERAL-ORDER-NO-1-2-2-1-County-Department.aspx>

**Defendant-Appellant, Watts, showed Judge Shelley (viz Watts' “9/11/2017” motion) that she had the authority to vacate the incorrect Chancery rulings, but Judge Shelley, presiding over this Law Division case being appealed, chose not to, for reasons known only to her and The Almighty.** For that reason, the undersigned now appeals to this reviewing court.

**This 4-prong summary, is the “result in the Trial Court” in this matter.**

**10 . Briefly state the general issues proposed to be raised (failure to include an issue in this statement will not result in the waiver of the issue on appeal):**

**1. Issue of Law:** Whether, as a matter of law, the CIRCUIT COURT'S Law Division is permitted plenary authority to rule on or vacate 'all' orders arising from the Chancery Division, as was argued in the 9-11-2017 motion, and summarised above. **(Standard of Review: *de novo*, as this court has just as good a grasp on the law as the trial courts)**

**2.** Whether it's finally clear that Daniggelis is the victim of mortgage fraud, which even Judge Otto's March 08, 2013 Order admits:

**A. Issue of Fact** as raised regarding **Otto's** false claims that documents weren't signed, even tho the record says otherwise. **The standard of review** here “Clearly Erroneous” (aka: Plain Error aka Manifest Error).

**B. Issues of Law** (which are reviewed *de novo*, as this court has as good a grasp on law as trial courts), regarding forgery & fraud. Here, the courts below *again* made “clear error,” “plain error,” “manifest error,” or even “plainly nonsense,” depending on your verbiage.

**3.(A) Issue of Law:** Whether the ILLINOIS RULES OF PROFESSIONAL CONDUCT definition of a lawyer, as an officer of the court, is sufficient to sustain an **“ineffective counsel” argument**, in “civil appeal” cases, such as how **Galic** is documented to have continually failed **Daniggelis**. (Since Illinois recognises attorneys as 'Officers of the Court', and not merely private citizens, then Galic's failure is legally equivalent to a failure of the Judicial Branch, and thus Daniggelis' **Due Process** was denied, and no further legal argument is needed to advance an 'Ineffective Counsel' defense... *or is it?* This court reviews my legal claim *de novo*.)

ARTICLE VIII. ILLINOIS RULES OF PROFESSIONAL CONDUCT OF 2010,  
Preamble: a Lawyer’s Responsibilities reads: “[1] A lawyer, as a member of the legal profession, is a representative of clients, **an officer of the legal system** and a public citizen having special responsibility for the quality of justice.”

Cite: [http://www.IllinoisCourts.gov/supremecourt/rules/art\\_viii/artviii\\_new.htm](http://www.IllinoisCourts.gov/supremecourt/rules/art_viii/artviii_new.htm)

**3.(B) Issue of Law—Constitutionality & other standards:** Whether this court will refuse to hear the merits of this case and deny Daniggelis **Due Process** because of ineffective counsel. This may not be illegal (*yet... see 3.A., above*) but it certainly runs afoul of the other three major standards:

I. **Unconstitutionally** denying Daniggelis his **Federal Due Process** rights to have a fair day in court—as codified in **Rule 10-100(a) (Illinois Supreme Court Commission on Access to Justice)**, which states: “The Illinois Supreme Court Commission on Access to Justice is established to promote, facilitate, and enhance equal access to justice with an emphasis on access to the Illinois civil courts and administrative agencies for all people, particularly the poor and vulnerable.” Cite: [http://www.IllinoisCourts.gov/SupremeCourt/Rules/Art\\_X/Art\\_X.htm](http://www.IllinoisCourts.gov/SupremeCourt/Rules/Art_X/Art_X.htm)

II. **Immoral**, as his house was stolen, and he wasn't paid a dime, and was made

homeless, sleeping in his rental van, there for a spell, and stressed out, as he is elderly. Do morals matter anymore?

III. **Impractical:** While this court was not bound by law to accept my *amicus curiae* briefs, it only delayed the inevitable to refuse to review them with scrutiny: This caused additional delays and headaches for all parties – both the litigants (victims) and the court.

**4.(A) Issue of Law: Whether a trial (circuit) court's refusal to rule on a motion (and issue a responsive motion) constitutes a denial of First Amendment Redress and Due Process.** – This issue is raised because appellant notices a pattern of silence in the trial courts, particularly touching *pro se* litigants (which also implicates **Equal Protection**). Appellant is not suggesting that a trial court must “rule on” **all** motions, as *some* motions are clearly erroneous, nor should a clearly vexatious litigant be acknowledged. However, if, as in the appeal, *sub judice*, a litigant moves to Intervene, and carefully documents the costs and interests—as the July 7, 2017 motion to intervene, by Intervenor, Gordon Wayne Watts, and no explicit ruling issues, this leaves litigants and court officials confused. **PROOF:** Appellant-Defendant, Watts, represents to This Court that Deputy Chief, Patricia O'Brian, in the Civil Appeals Division, is very intelligent, and also dedicated in answering technical questions about appeals, but even she was negatively influenced by a lack of an explicit ruling on the 7-7-2017 motion *supra*: She insisted, in a recent phone conversation, that the undersigned defendant, whose name appears on docket, was not a “party” to this case, and not qualified for a Fee Waiver, and that any appeal of that could not proceed without payment of the fee **for which the applicant is exempt**. (The undersigned is a food stamp recipient, and can **\*\*barely\*\*** pay printing & mailing costs.)

**4.(B) Issue of Law: Whether inability to appeal a denial of Application for Fee Waiver unless fees are paid constitutes a “catch-22” denial of Due Process:** can't appeal without paying huge fees, and can't pay huge fees without winning appeal if waiver is denied in circuit court. [*Note: If Mandamus is a proper remedy for wrongly denial of fee waiver, as hinted supra, then this issue is a moot question, and may be safely ignored.*]

**4.(C) Issue of Law: Whether one's name appearing on docket is sufficient indication of party status, as defendant, Watts, alleges, or insufficient, as O'Brian claimed.** [Hint: Since a person may bring suit *de novo* to sue Joseph Younes, and thus make one plaintiff and a party, thus this cross-complaint against Younes is legally indistinguishable, making me a party.] The concern, here, is that trial courts may “abuse their discretion” & prevent a person from being a party in order to slow or stop their appeal of a bad ruling, thus impeding their Due Process.

**5. Issue of Law: Whether all parties to a case must be served when making motions to the court.** – This seems like a “no brainer,” and a waste of This Court's time; however, even a cursory review of the court below shows that many litigants often serve just 1 or 2 parties, **and FAIL to serve all the parties, proper**. As this is endemic **and common practice**, but a clear violation of **the most basic professional legal standards**, this matter *must* be addressed already. This Court can clearly see, in my Certificate of Service, that the undersigned is **respectful** to the other parties, and serves **ALL** parties ((#1)) **hard copies** by mail; ((#2)) via **e-mail** when possible; ((#3)) by **e-File**, when it became available; **and, lastly**, ((#4)) My online docket, which **all** may view for free, has not just 'docket entries,' but the filings themselves, for download/viewing.

**6.((A)) Issue of Law:** Whether the trial court's **repeated delays** in preparing the Record on Appeal, in at least 1 of the 2 prior related appeals, implicates Due Process. While it is without dispute that **Galic**, as attorney for Daniggelis, was negligent in moving for “extension of time” in such cases, the court (*and not the parties*) prepares the **Record on Appeal**. (And, now with new electronic standards, the court also *transmits* the Record to the Reviewing Court—instead of having the appellant do so, as in the the recent past.)

**6.((B)) Issue of Law:** Whether this reviewing court can consider the merits of the 2 other related cases (even though those appeals have expired), which are the **\*\*same\*\*** issues raised in the case at bar being appealed, here – e.g., this case *sub judice*. [Hint: Since the merits were never reached, there wouldn't be violation of *Res Adjudicata*, nor would any issues be collaterally estopped. I will argue that this reviewing court can consider the case *sub judice*, rule on it, and dispose of all issued raised in the 2 related cases.]

**7. Issue of Law:** Whether the trial courts, below, committed **Manifest Error** in applying the “**Burden of Proof**” **backwards** regarding ownership of 1720 N. Sedgwick (house & property, which has hundreds of thousands of dollars of equity, as many of us have documented in our past filings, below). [Daniggelis was forced to prove that his house was his, beyond all reasonable doubt, even though the circuit court should clearly have demanded that **Younes** and **Shelton** be the ones to meet this threshold before just snatching house, land, & equity.]

**8. Issue of Law:** Whether ((a)) Younes' admission of a conspiracy (see *infra*), from which he later profits & benefits; or ((b)) Judge Otto's admission of facts supporting & documenting fraud claims (see *supra*); or, ((c)) Younes' repeated attempts to gut, demolish, and destroy Daniggelis' house (see recent ***DNAinfo*** stories, as cited in various filings by Appellant, or see the *City of Chicago v. Younes, et. al.* case in Civil: 2014-M1-400775) are **individually or collectively sufficient** for this court to make a referral to the IARDC for discipline against Younes, for unprofessional conduct, not unlike the recent IARDC action against **Younes' former law partner, Paul Shelton, who lost both his broker's license, and then his law license.**

\* **Documentation that Shelton was Younes' former law partner:** March 21, 2011 complaint against Atty. Paul L. Shelton, by the IARDC Administrator, Commission No. 09-CH-58: [http://www.iardc.org/rd\\_database/rulesdecisions.html](http://www.iardc.org/rd_database/rulesdecisions.html) (Look up case by entering 'Younes')

\* **Documentation that Younes admitted conspiracy, and then benefited from it, thus implicating himself:** EXHIBIT-Exhibit-D(2.) “Younes complaints to OAG about Linda Green conspiracy: Feb 06, 2013” – an exhibit in the “04/21/2017” motion filed by “pro se” (e.g., appellant, Gordon Wayne Watts), which is a Public Records document that the Office of Attorney General released, showing a complaint that Younes had made against DocX, U.S. BanCorp, Nationwide Title Clearing, and Bank of America, N.A., regarding the infamous “Linda Green” fraud assignments.

**9. Issue of Law:** Whether appellant has to document all of his 'interests' under Intervention case law (and 735 ILCS 5/2-408(a)(3)) to make a full claim, or whether some (which is hard to document) can safely be estimated, *CoC v. Hancock Mutual*, 127 Ill.App.3d 140, 144 (1st Dist. 1984), which **This Court** decided regarding Intervention.

**10. Issue of Law:** Whether the **Application for Fee Waiver** in this appellate court must be served upon all parties; or, rather, can it be served *ex parte*, as the Circuit Court's “approved form” allows? This is a matter of **Equal Protection** (litigants in this court have a higher standard), as well as **Due Process** (financially indigent litigants—like the undersigned appellant—are struggling to just print and mail the service copies in question). If **Due Process** is not offended by the court *below* allowing a Fee Waiver application to be served *ex parte*, on the court alone, then why must indigent applicants, to this court, serve all the parties extra paperwork that costs to print and mail? And—which paperwork the other litigants probably don't care to read? [[Side-note: While this appellant is not ashamed to release his financial statements or admit financial poverty, some litigants may feel this is 'private' information, not appropriate to share with other parties in a case. *However*, if a Fee Waiver application is served on all parties at the same time as the Docketing Statement, as the rules require, then the extra costs would probably add little—if any—costs to postage, and only require printing of additional paperwork, which could be double-sided to save paper.]]

**Miscellaneous Court issues implicating Due Process**

**11.(A) Issue of Law:** Did Judge Sanjay T. Taylor's January 17, 2017 order, in the case *sub judice*, offend **Due Process** when the judge threatened to dismiss the case (punish the victim, Mr. Daniggelis) for the failure of the Sheriff's Department to serve a party a subpoena (a “body attachment,” as the order describes)?

**11.(B) Issue of Law: Is issue 11.(A), *supra*, a moot point, in light of the fact that Daniggelis had a compelling case for summary judgment, and did not need to issue a subpoena?** [Hint: The July 24, 2012 Order, by then-Judge Mathias W. DeLort, now a member of This Honourable Court, royally chews out Daniggelis' attorney, Andjelko Galic, for focusing too much on invalidating the actual underlying foreclosure suit by questioning ownership based on the infamous "Linda Green" assignment fraud issues –instead of focusing on the actual mortgage fraud in question, which, of course, was the illegal transfer of title from Daniggelis to Younes, without any payment to Daniggelis, and by clear & obvious used of a "photocopy forgery-fraud" signature, and for purposes other than the mere refinancing for which Daniggelis initial sought help—which we now know is even documented and supported by a 2013 ruling by Judge Otto.]

**11.(C) Issue of Law: Does it offend Due Process for the trial court to enter a ruling, but refuse to provide the litigant with a copy of the ruling, making it impossible to appeal said ruling?** Clarification: I know this seems “trivial,” and, really, it is (in most cases), but a **\*\*very\*\*** common practice of the circuit court (Chancery, Law, and Civil Divisions, at the least) is to usually no provide a copy (either mailed or electronic, e.g., a scanned image from the docket) to a litigant whose motion is denied. In those cases where the litigant can not afford to make a “Public Records” request, and lives too far from the courthouse to physically pick up a copy, he/she is prevented from appealing any order (Due Process issue) is the court doesn't (at the least) email him/her a scanned image (and they usually don't). Again, apologies, for a possibly “*de minimus*” waste of the precious time of the reviewing court justices, but, as some litigants (including the undersigned) occasionally find themselves in this situation, I would argue that the court must provide the litigants or movants with copies of orders (as most courts do),



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

**Docket Number: 1-18-0091**

**GMAC Mortgage, LLC** n/k/a: Bank of ) Appeal from the Circuit Court of Cook County, IL  
America, N.A., aka: "LaSalle Bank Nat'l ) County Department, Law Division  
Association," aka: "US Bank, NA," as )  
trustee for Morgan Stanley Loan Trust ) **Circuit Court Case No.:** 2007-CH-29738  
2006-16AX, ) (Transfer into **Law Division** from Chancery)  
**Plaintiff,** )  
**vs.** ) **Trial Judge:** Hon. Diane M. Shelley (#1925)  
**Richard B. Daniggelis,** ) **Notice of Appeal date:** Monday, 08 January 2018  
**Gordon Wayne Watts,** Joseph Younes, ) **Judgment Date:** Wednesday, 07 December 2017  
Paul L. Shelton, Erika R. Rhone, Robert J. ) **Date of Post-judgment Motion:** None  
More, John P. LaRocque, NON-RECORD ) **Order:** #5  
CLAIMANTS, UNKNOWN OWNERS, )  
UNKNOWN HEIRS, LEGATEES, *et. al.*, ) Supreme Court Rule(s) which confer(s) jurisdiction  
**Defendants.** ) upon the reviewing court: **Ill.Sup.Ct. R.301, 303**

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**NOTICE OF FILING**

To: See attached Service List

**PLEASE TAKE NOTICE** that today, **Friday, 19 January 2018**, I am causing to be filed with the **ILLINOIS 1<sup>st</sup> Appellate Court** my **Docketing Statement and Notice of Appearance of Counsel for Appellant**, this **Notice of Filing**, an **Updated and Corrected "Service List"** of parties, and my **Request for Preparation of the Record on Appeal**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

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

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

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

- \* **1st District Appellate Court**, Clerk's Office, 160 North LaSalle St., Chicago, IL 60601 (312) 793-5484 , Office Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays **[served by eFiling only, since this The Court no longer accepts paper filings]**
- \* **CIVIL APPEALS DIVISION**: Richard J. Daley Center, 50 West Washington St., Room 801 Chicago, IL 60602 – (312) 603-5406, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays Attention: Deputy Chief, Patricia O'Brian, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) **[served by email / electronic service only, as a courtesy, since this is an appeal]**
- \* **Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602 Courtesy copy via: [Timothy.Evans@CookCountyIL.gov](mailto:Timothy.Evans@CookCountyIL.gov) **[served by email / electronic service only, as a courtesy, since this is an appeal]**
- \* **Hon. James P. Flannery, Jr.**, Cir. Judge–Presiding Judge, Law Division [re: “Application for Waiver of Court Fees”] 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343 Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) **[served by email / electronic service only, as a courtesy, since this is an appeal]**
- \* **Law Division and Hon. Diane M. Shelley, Circuit Judge**, **[served by email / electronic service only, as a courtesy, since this is an appeal]** [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov)
- \* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis 773-327-7198 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652
- \* **Unknown Owners/NonRecord Claimants** 1720 North Sedgwick St., Chicago, IL 60614-5722
- \* **Andjelko Galic** (Atty#:33013) Cell:312-217-5433, Fax:312-986-1810, Phone:312-986-1510 845 Sherwood Road, LaGrange Park, IL 60526-1547 **(Please take note of Mr. Galic's new address)** Email: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) ; [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com)
- \* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812
- \* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**  
Attn: Carrie A. Dolan, 208 S LASALLE#1860, CHICAGO IL, 60604 [ph:(312) 726-2252]

**SERVICE LIST (continued from above)**

\* **MERS** (Mortgage Electronic Registration Systems, Inc.) <https://www.mersinc.org/about-us/about-us> a nominee for HLB Mortgage; Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@mersinc.org](mailto:SandraT@mersinc.org) Dir, Corporate Communications, 1595 Springhill road, Suite 310, Vienna, VA 22182  
**(703) 761-0694 / (800)-646-6377**

\* **Stewart Title, Attn: Leigh Curry**  
<http://www.Stewart.com/en/stc/chicago/contact-us/contact-us.html>  
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\* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

\* **Richard Indyke, Esq.** Atty. No. 20584, (312-332-2828 Atty for LaSalle Bank Natl. Assn.),  
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\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)  
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\* **John P. LaRocque**, 2 Orchard Place, Hinsdale, IL 60521 ***[Last known address]***

\* **Paul L. Shelton**, (630) 993-9999, (630) 333-4009, (630) 286-5100, / Direct: (630) 842-0126  
(Atty. #15323, disbarred per IARDC) E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net)  
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c/o: Shelton Law Group, LLC, <https://www.youtube.com/user/PaulSheltonLawGroup>  
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\* **Paul L. Shelton, Pro Se**, 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351

\* **Paul L. Shelton** [PH: 630-986-5555], 10 North Adams Street, Hinsdale, IL 60521

\* **Erika R. Rhone** 9948 South Normal, Chicago, IL 60628-1229

\* **Erika R. Rhone** [ph:(773) 788-3711], 22711 Southbrook Dr., Sauk Village, IL 60411-4291



Request for Preparation of Record on Appeal

**EXHIBIT B**

(Rev. 8/28/08) CCA 0025

APPEAL TO THE APPELLATE COURT OF ILLINOIS  
FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY \_\_\_\_\_ DEPARTMENT, LAW DIVISION, First Municipal District, Calendar "W"

GMAC, et. al., Plaintiffs / Appellees  
Plaintiff/Appell \_\_\_\_\_  
Daniggelis, Watts,  
Younes, et. al., Defendants / Appellants

Reviewing Court No. \_\_\_\_\_  
Circuit Court No. 2007 - CH - 29738  
Honorable Diane M. Shelley, Circuit Judge  
Trial Judge  
Date Notice of Appeal Filed Monday, 08 January 2018

REQUEST FOR PREPARATION OF RECORD ON APPEAL

Attorney (or Party if no attorney):

Name: Mr. Gordon Wayne Watts Cook County Attorney Code No. 99500 or Pro Se 99500  
Address: 821 Alicia Road, City: Lakeland State: Florida Zip: 33801-2113  
Telephone Number: H: 863-688-9880 / C: 863-409-2109

Attorney for: Pro Se E-mail Address (optional) Gww1210@aol.com / Gww1210@Gmail.com  
Name of Party GordonWatts.com GordonWayneWatts.com

NOTICE IS HEREBY GIVEN to the Clerk of the Circuit Court of Cook County that  
Mr. Gordon Wayne Watts requests the preparation of the Record on Appeal in the above case.  
Name

DESIGNATION OF RECORD

The Clerk of the Circuit Court of Cook County shall prepare the Record on Appeal in accordance with Illinois Supreme Court Rule 321. The record on Appeal shall include the common law record, which consists of trial documents filed and judgments and orders entered by the trial court and:

- All documentary exhibits entered at trial, except for those other exhibits that cannot ordinarily be included for review and are subject to motion.
- Reports of Proceedings prepared in accordance with Illinois Supreme Court Rule 323.
- Certificate in Lieu of Record on Appeal pursuant to Illinois Supreme Court Rule 325.
- Documents filed under seal on the following dates and unsealed: \_\_\_\_\_  
A copy of the trial court Order authorizing these documents to be unsealed for the purpose of inclusion in the Record on Appeal is attached hereto or will be provided by the Appellant to the Civil Appeals Division at least 30 days in advance of the date on which the Record on Appeal is scheduled to be transmitted to the Appellate Court. Upon return of the Record on Appeal to the Circuit Court, it is the responsibility of the parties to obtain an Order resealing these records, if the records are to be resealed.
- Documents filed under seal on the following dates, which are to remain sealed: \_\_\_\_\_  
Please note that, pursuant to Rule 17 of Appellate Court of Illinois, "No record, exhibit, or brief may be filed under seal in the Appellate Court, unless Appellate Court has first given leave for filing under seal, notwithstanding that the material was filed under seal in the Circuit Court."

FEEES

Payment may be made by Cash, Check or Money Order. Cash payments accepted for in-person payments only. Checks or money order should be made to Clerk of the Circuit Court of Cook County. Pursuant to 705 ILCS 105/27.2a(k) and 27.2(k), the Clerk of the Circuit Court of Cook County must charge fees for Records on Appeal in advance as follows:

100 pages or less, \$110  
100 - 200 pages, \$185  
Each page in excess of 200, \$.30/page  
Reduced fee for Local Governments and School Districts, \$50

All prescribed fees are due in advance of transmission of the Record on Appeal. It is understood and agreed that once a request for preparation of a Record on Appeal is made by submission of this form, the Appellant is responsible for the costs of preparing the Record on Appeal, regardless of whether the Appeal is successful, dismissed, the time is extended, or a party elects to not transmit the Record on Appeal to the Appellate Court. The Clerk of the Circuit Court of Cook County reserves the right to pursue a claim to recover the costs and expenses, including reasonable attorneys' fees, related to preparation of the Record on Appeal.

Mr. Gordon Wayne Watts  
(Type or print name)

Gordon Wayne Watts  
(Signature of Appellant or Appellant's Attorney)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

MONDAY,  
08 January 2018