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,)	Circuit Judge
VS.)	Case Type: CONTRACT
)	District: First Municipal
Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,)	Calendar "W", Courtroom 1912
Defendants, and:)	
)	TIME-SENSITIVE: to be heard
Gordon Wayne Watts,)	in Court Room:1912, by 07/10/2017
Proposed Intervening Defendant.	Ĵ	Court Time: 10:30am (CST)

MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS

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

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

2. Mr. Richard B. Daniggelis, the true owner, who lost his house (1720 N. Sedgwick St., Old Town, Chicago, IL) through a forged signature in a mortgage fraud scheme (and which fraud tort is still being actively litigated and investigated in several forums, some Judicial and some Executive), was, on occasion, allowed to speak in court, in order that he might get Due Process for his mistreatment. The undersigned Intervenor is in communication with Daniggelis, and he asserts that Daniggelis informed Watts that he (Daniggelis) desires to communicate with the court, but is unable (because he lacks the legal know-how to do so), and his attorney is not at all helpful in this regard.

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

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

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

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

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

MEMORANDUM OF LAW:

PETITIONER IS ENTITLED TO INTERVENE AS A MATTER OF RIGHT.

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

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

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

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

Newly-discovered facts of a dispositive nature

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

"Jordan Matyas, who represented the Old Town Triangle Association at Thursday's court hearing, said Younes was being disingenuous in saying he didn't intend to level the site. "He's told me twice that he always wanted to demolish it," Matyas said, and he told the judge that he intended to pursue a demolition permit as well. "So we

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have some mixed signals from the owner, but his actions speak clearly about his intent for the building."" [Source: "Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, *DNAinfo*, **March 30, 2017:** https://www.DNAinfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city] See also <u>EXHIBIT-A</u> in the instant filing. [Watts, who knew of this news item right after it published, on 3-30-2017, did not include it in his last filing, dated 4-22-2017, because he was struggling to file it in time for Judge Ball-Reed to get it before the 4-27-2017 hearing. Watts, by virtue of this statement, issues a sincere apology for his oversight & slowness here.]

<u>Newly-discovered Eyewitness Testimony of a dispositive nature</u>

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

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

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

Work done for Daniggelis

Mr. Daniggelis asked the undersigned Intervenor for assistance on a number of matters, including, but not limited to searching for, obtaining, and pass along many records (some court records, some publicly-accessible

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

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

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

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

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

Respectfully submitted this Thursday, July 06, 2017:

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

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

LAW DIVISION: Richard J. Daley Center, 50 West Washington St., Room 801 Law@CookCountyCourt.com; (312) 603-6930; (312) 603-5426 Chicago, IL 60602 – , Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays Page 4 of 6 (Motion to Intervene by Intervenor, Gordon Wayne Watts)

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

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

(312) 603-5940, (312) 603Diane.Shelley@CookCountyIL.gov-7551, (312) 603-4811 Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602

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

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

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

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

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

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

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

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

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

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

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

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

Paul L. Shelton, Esq.

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

* Joseph Younes Law Offices / <u>http://ChicagoAccidentAttorney.net</u> (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?) <u>RoJoe69@yahoo.com</u> per <u>http://www.ZoomInfo.com/p/JosephYounes/599467626</u> *Note:* Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see e.g., <u>EXHIBIT-C</u> in the instant filing], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr.

Younes & other litigants), and send me a nominal bill for said service, but, I doubt anyone would question me on this. In fact, Younes will have to get his service copy from his attorney, Hugh Howard, who uses the same mailing address: **Younes' attorney Hugh Howard, c/o: Law Offices of Hugh D. Howard,** 166 W Washington St, Suite 600, Chicago, II 60602, Phone | 312-781-1002, Email | Hugh@HughDHowardLaw.com, per: http://www.HughDHowardLaw.com

MERS (Mortgage Electronic Registration Systems, Inc.)

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

a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: JanisS@mersinc.org Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email: SandraT@mersinc.org – Director, Corporate Communications Note: MERS is only being served electronically per above.

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by

• 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: _____ Gordon Wayne Watts, *Intervenor, pro se* 821 Alicia Road Lakeland, FL 33801-2113 PH: (863) 688-9880 (home) or: (863) 409-2109 (cell) Web: www.GordonWatts.com / www.GordonWayneWatts.com Email: Gww1210@aol.com / Gww1210@gmail.com Date: Thursday, 06 July 2017

INDEX TO THE EXHIBITS

Instrument

Docket/Tab#

DNAinfo news item (screenshot)

A-1 (news item title) A-2 (section quoting Jordan Matyas, who *effectively* calls Younes a liar)

Work done for Daniggelis

Exhibit-B

Exhibit-A

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

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

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

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

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

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

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

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

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

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

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

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

- (AxiomBanking 05/26/2016 pay for FOIA research printouts to UPS to Daniggelis, \$9.60)
- B-12 (FOIA 07/01/2016: FOIA Request from First Appellate Court, IL, acknowledging \$76.25 in fees)
- B-13 (FOIA 07/01/2016: FOIA costs: \$76.25 money order; \$6.47 mailing; \$3.95 lunch break)
- B-14 (FOIA replies of 06/03/2016 and 04/07/2017 from City of Chicago, Building Dept. Cost: TIME)
- B-15 (FOIA reply of 06/07/2016 from City of Chicago, POLICE Department. Cost: TIME)
- B-16 (FedEx shipping receipt to send FOIA research to Daniggelis: 09/15/2015, est. cost \$8.88 + labor)

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

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

FedEx package refused by Atty. Joseph Younes

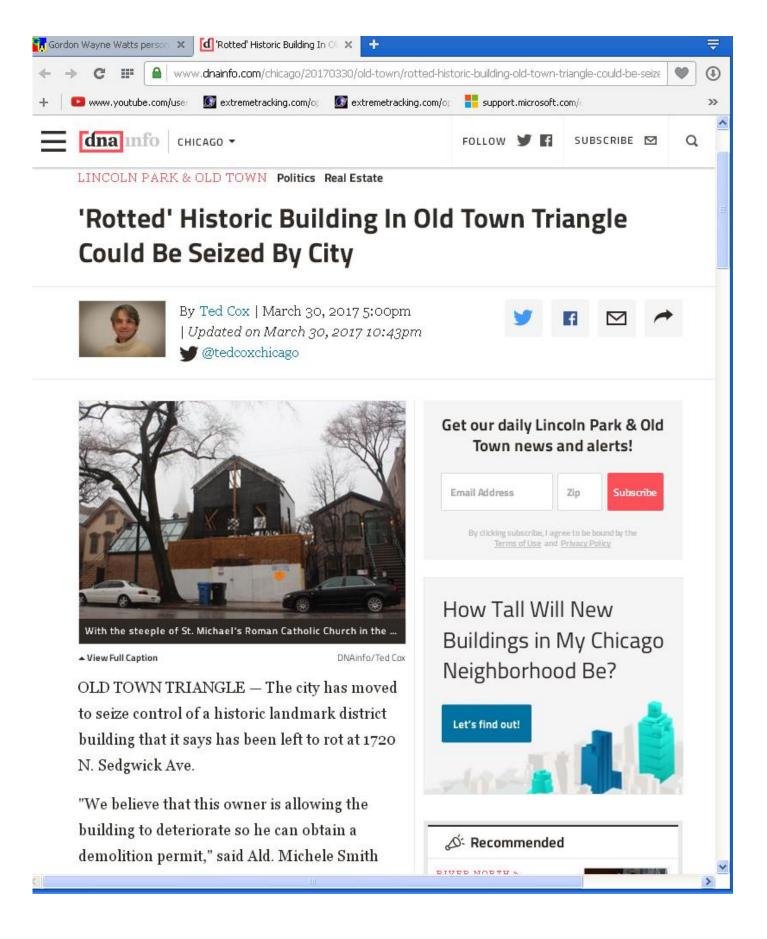
Exhibit-C

- C-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)
- C-2 (AOL email dated April 21, 2017 from FedEx showing Defendant, Younes, refused court service)

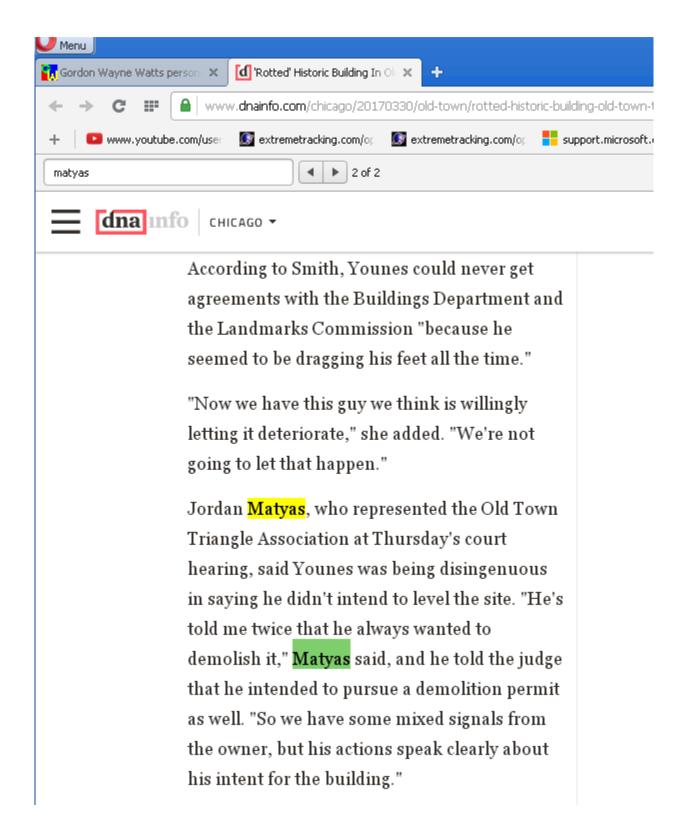
C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

Exhibit-A

A-1 (news item title)



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



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

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

 Subject:
 copies file 07ch29738,04ch10851,14m1701473

 Date:
 7/16/2015 12:30:29 P.M. Eastern Daylight Time

 From:
 sdlevy@cookcountycourt.com

 To:
 gwvw1210@gmail.com

 CC:
 gwvw1210@aol.com, cmeddington@cookcountycourt.com

 Sent from the Internet (Details)

Hello Mr. Gordon,

Please see attachment,

Thank you,

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

=

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

LexisNexis Payment Solutions

Page 1 of 1

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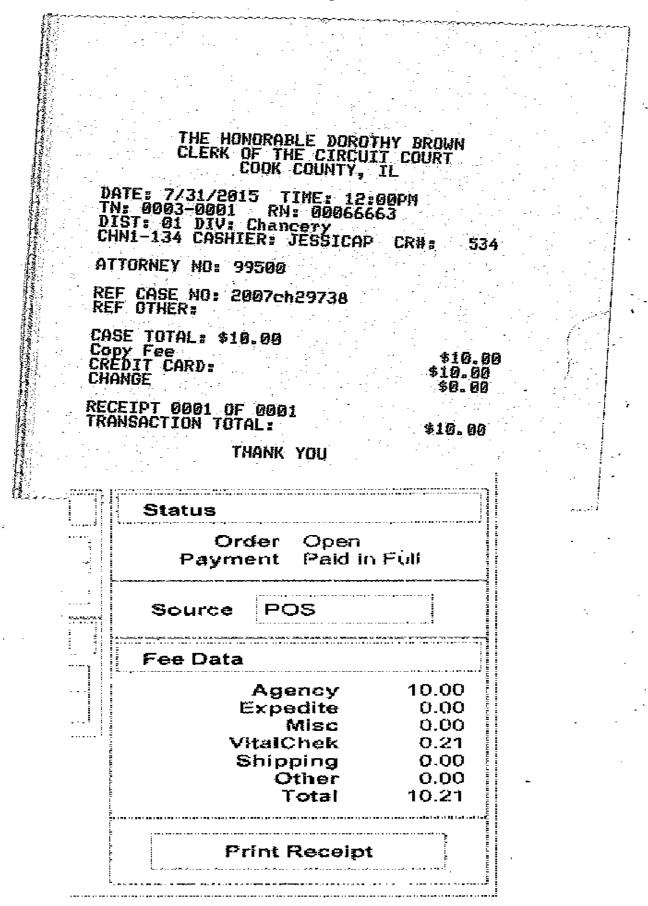
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Print Receipt	·····

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

THE HONORABLE DOROTHY BROWN CLERK OF THE CIRCUIT COURT COOK COUNTY, IL 7/24/2015 TIME: 4:16PM RN: 00066575 0010-0001 DIST: 01 DIV: Chancery CHNI-134 CASHIER: JESSICAP CRA: 529 ATTORNEY NO: 99500 REF CASE NO: 2004ch10851 REF OTHER: 2007CH CASE TOTAL: \$102.50 Coby Fee Copy Fee Record Searches CREDIT CARD: .50 . 90 . \$102.59 \$0.00 CHANGE RECEIPT 0001 OF 0001 \$102.50 TRANSACTION TOTAL: THANK YOU

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

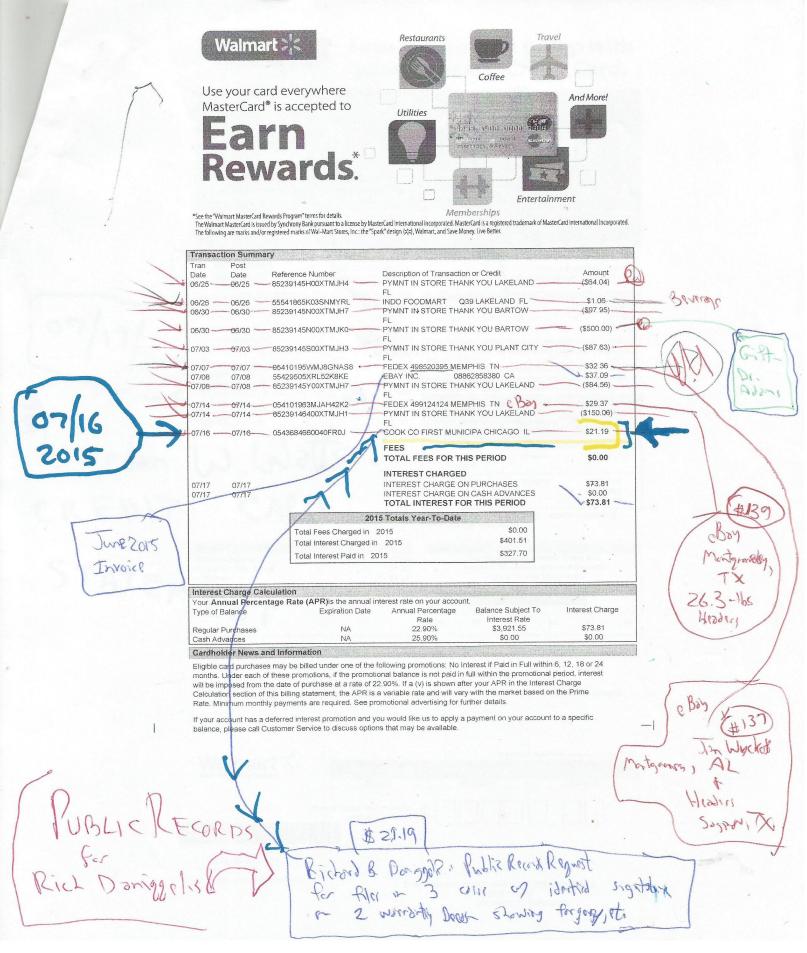




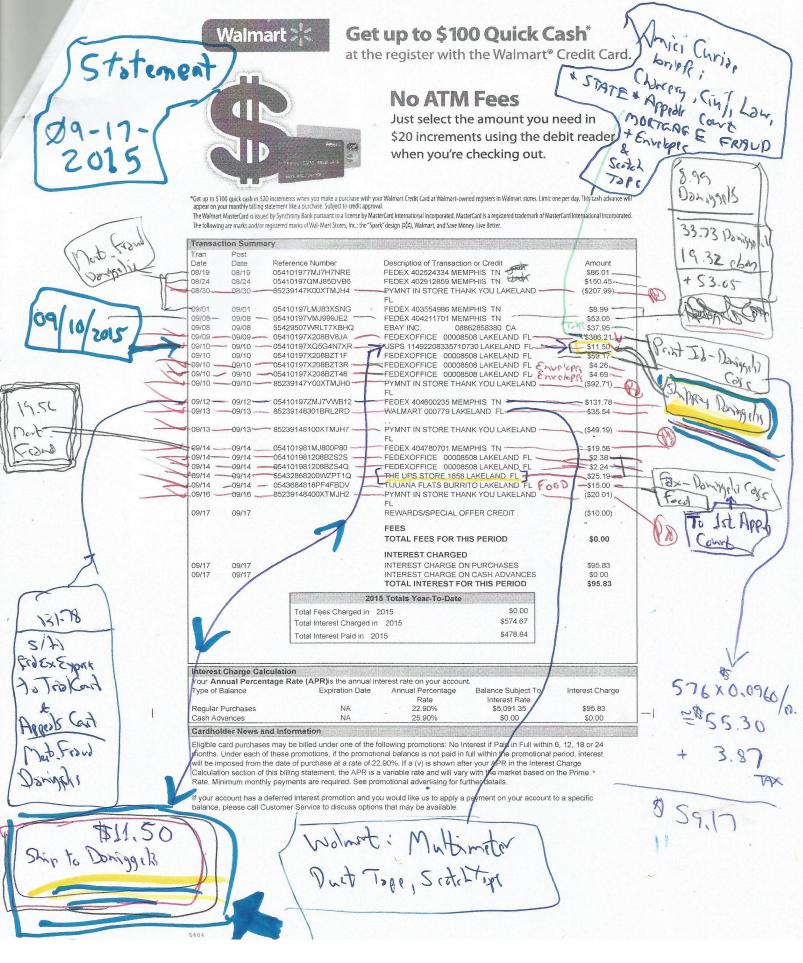
Save more at the pump with your Walmart[®] Credit Card.

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ſ	Walmart [®] MasterCard [®]	GORDON W WATTS Account Number: xxx	xx xxxx xxxx 2738		t walmart.com/credit ice: 1-866-611-1148
07/17/2015	Summary of Account Activity Previous Balance - Payments + Purchases/Debits + Interest Charges New Balance Credit Limit Available Credit	\$4,353.74 \$984.24 \$121.07 \$73.81 \$3,564.38 \$10,000 \$6,435 \$0.000	Payment Information New Balance Total Minimum Paymen Payment Due Date Late Payment Warnin payment by the date list fee up to \$35.00. Minimum Payment V payment each period, y take you longer to pay	nt Due ing:If we do not rec sted above, you may Narning: If you ma you will pay more in	have to pay a late ke only the minimum interest and it will
	Cash Advance/Quick Cash Limit Available Cash Statement Closing Date Days in Billing Cycle	\$2,000 \$2,000 07/17/2015 30	If you make no additional charges using this card and each month you pay	You will pay off the balance shown on this statement in about	And you will end up paying an estimated total of
Jordon	is wat	S	Only the minimum payment	16 years	\$9,033.00
COEDIT	CAPD		\$138.00	3 years	\$4,960.00 (Savings = \$4,073.00)
CREDIT	CARD		If you would like inform services, call 1-877-3		t counseling
STATEM	Rewards Summary Previous Balance (+) Earned This Period = Balance	\$2.60 \$1.20 \$3.80	you earn \$	Rewards is easy! E 5, you will receive dit on your stateme	a Rewards
	ENT		\$0 \$1	\$2 \$3	\$4 \$5

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



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

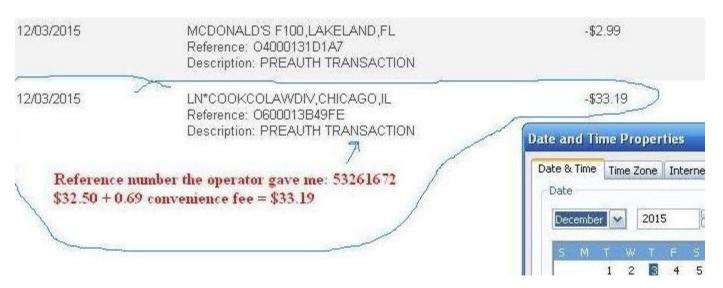


B-8 (FOIA – 12/03/2015: bill of \$33.19 to LAW Division, Cook Cty, IL, records)



-		Card Activit	y	card number xxxx-2746	expiration date 05/19	card status a
>	Account Card activity Statements	Available Balance	\$55.57			
	Report lost or stolen card Activate a card	Pending Transa	actions 2 transactions			PRINT
Gordon's ledger:	Request a replacement card	DATE	TRANSACTION		DEBIT	CREDIT
96.70 pd to CVS -3.95 activation fee = \$92.75	Fund How to Reload Reload Card at vanillareload.com	12/03/2015	MCDONALD'S F100,LAKEL Reference: 04000131D1A7 Description: PREAUTH TRA		-\$2.99	
-2.99 McD -0.50 Transaction Fee =\$86.26 -32.50 Law Division	Download Direct Deposit form Manage Alerts i Sign up for direct deposit i		LN*COOKCOLAWDIV,CHIC, Reference: 0600013B49FE Description: PREAUTH TRA	NSACTION	-\$33.19 Date and Time Prop Date & Time Time Zor Date	2
Public Records -0.50 Txn fee -0.69 convenience fee =\$55.57 Balance		\$32.50 + 0.69	convenience fee = \$33.19		S M T W 1 2	A CONTRACT OF
checks! :-)					13 14 15 16 20 21 22 23 27 28 29 30	17 18 19 24 25 26
		Current month	transaction history 1 tra	nsactions		

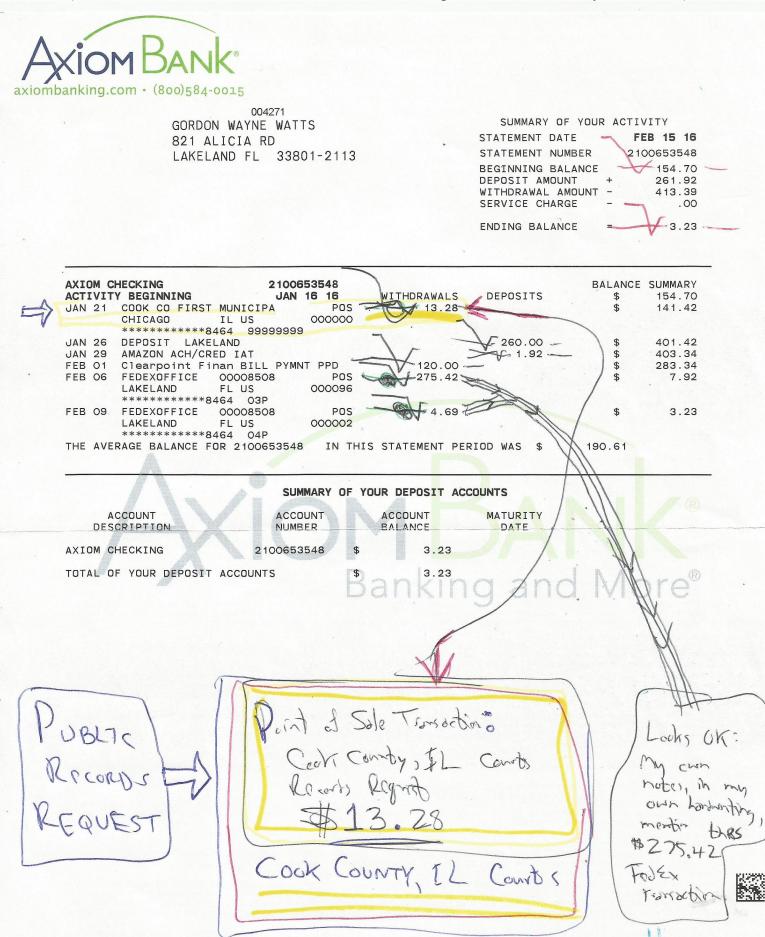
ZOOM view:



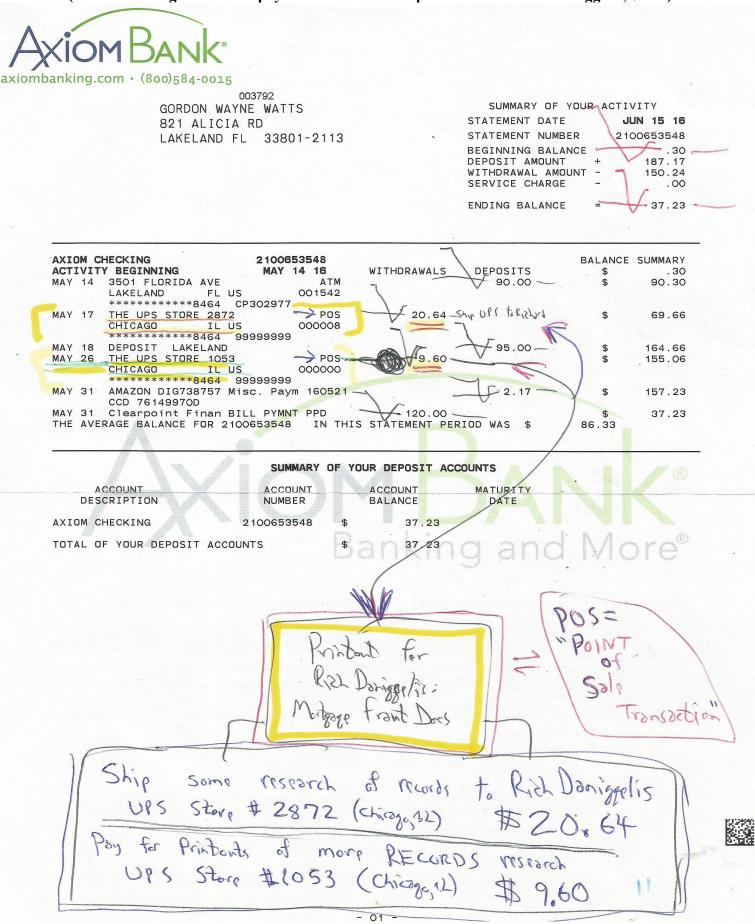
B-9 (FOIA – 01/13/2015: bill of \$2.25 to LAW Division, Cook Cty, IL, records)

OM ombanking.com • (800)584-0015 004461 SUMMARY OF YOUR ACTIVITY GORDON WAYNE WATTS Jan. 13: JAN 15 16 STATEMENT DATE 821 ALICIA RD STATEMENT NUMBER 2100653548 LAKELAND FL 33801-2113 123.91 BEGINNING BALANCE 377.68 DEPOSIT AMOUNT (COURTS) County OOK 346.89 WITHDRAWAL AMOUNT Publiz Records Request \$2.25 .00 SERVICE CHARGE DIVISION N 154.70 -ENDING BALANCE BALANCE SUMMARY 2100653548 AXIOM CHECKING WITHDRAWALS DEPOSITS \$ 123.91 DEC 16 15 ACTIVITY BEGINNING 323.91 \$ 200.00 -DEC 26 DEPOSIT LAKELAND DEC 26 RADIOSHACK COR Bottens for POS Flosh F41.84 282.07 \$ hants PLANT CITY FL US 442987 79.60 Tope, Lights Screns ((riling) 202.47 POS -DEC 28-FL US 130402 LAKELAND 148.23 54.24 Horsehold Lights \$ POS THE HOME DEPOT 2 ------DEC 28 171594 FL US LAKELAND -. 68 \$ 148.91 AMAZON DIG689922 Misc. Paym 151221 - DEC 29 CCD 69897657D \$ 28.91 120.00 DEC 30 Clearpoint Finan BILL PYMNT PPD 9.86 19.05 (Copied -S-POS 000005 PLANT CITY FL US 120.86 \$ 111.00 JAN 11 DEPOSIT LAKELAND JAN 13 DEPOSIT LAKELAND JAN 11 186.86 - 66.00 \$ 184.61 Record Regnet 2.25 \$ - LN*COOKCOLAWDIV-LOW Division POS billic JAN 13-000069 866-255-1857 IL US 154.70 \$ JAN 14 OREILLY AUTO PARTS 467 29.91 - Motor Oil POS 069245 FL US LAKELAND 88.17 IN THIS STATEMENT PERIOD WAS \$ THE AVERAGE BALANCE FOR 2100653548 SUMMARY OF YOUR DEPOSIT ACCOUNTS MATURITY ACCOUNT ACCOUNT ACCOUNT DATE BALANCE NUMBER DESCRIPTION 2100653548 154.70 \$ AXIOM CHECKING 154.70 \$ TOTAL OF YOUR DEPOSIT ACCOUNTS 9.52 fep 101.05 = 5 site of 1 Copio & Im for Muniper bass -Front Deer - Lock & Deadbuilt S= \$120,00 -ISA2

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



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



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

9 596 9463-0734-5196123868 From the Desk of: Gordon Wayne Watts 821 Alicia Road - Lakeland, FL 33801-2113 H: (863) 688-9880 - C: (863) 409-2109 - W: (863) 686-3411 or: (863) 687-6141 Email: Gww1210@aol.com / Gww1210@Gmail.com Web: www.GordonWatts.com / www.GordonWayneWatts.com

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AXIOM Bank

41742051

76.25

Friday, 01 July 2016

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

BALARTA

2001 65 35 48

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

Dear Attorney Schillaci:

10 USBS " 71-16 (G.12)

015-1730-0001-2318-468

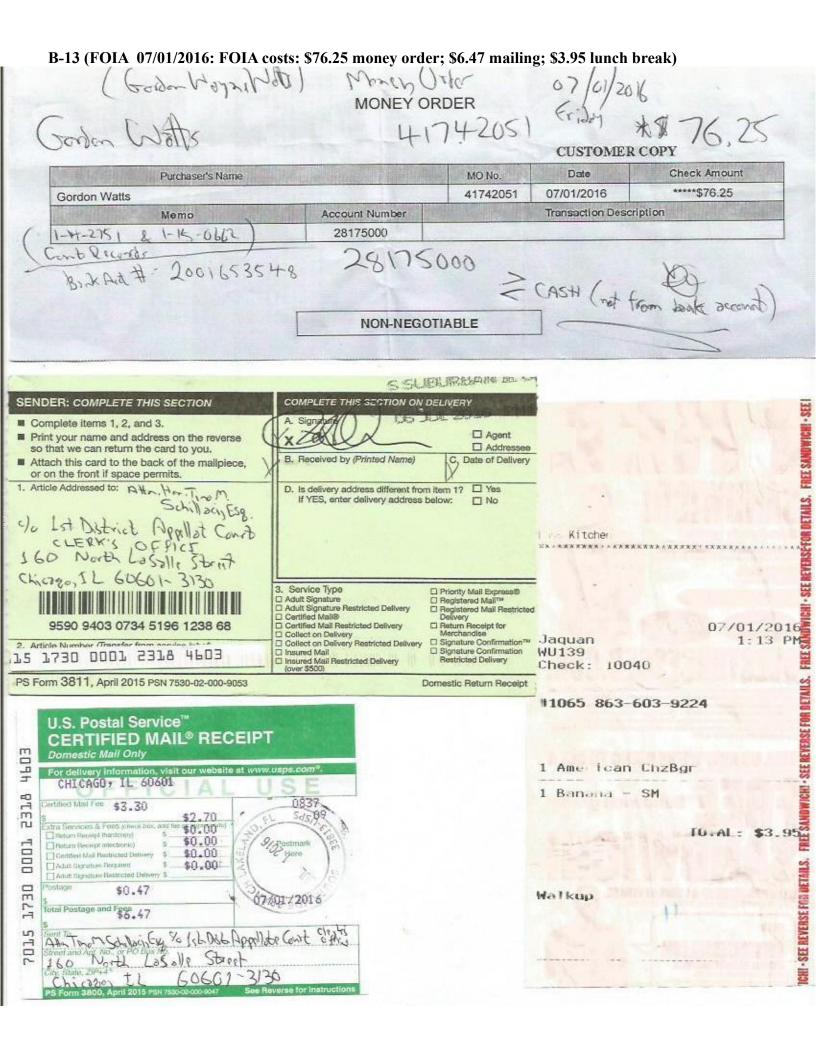
07/01/2011 Acit# 2 5 28175000 Thank you for speaking with me last Friday morning (Fri. 24 June 2016) and this past Tuesday evening (Tue. 28 June 2016), and giving me the proper protocol and procedures for making a records request of court filings in your court with regard to the two court cases cited above. I am sorry that I am somewhat slow to respond, but I have been busy with many things recently.

According to my recollection and notes, it would appear that you told me that the entire file in 1-14-2751 contained 172 pages, which, at \$0.25/page, would cost me \$43.00 even, and that 1-15-0662 contained 133 pages, which would cost me \$33,25, for a sum total of \$76.25, and that your court only accepted payment by cash, check, or money order, payable to "Clerk of the Appellate Court" (but had not yet set up payment by credit card or bank account electronic draft), and, also, that your court did not prefer to deal in case for obvious reasons of security and documentation of the currency. - You also said that if I were short, you could not advance credit, and would require payment in advance. - Moreover, my notes reflect that if the opposite was the case (overpayment), you warned and cautioned me that your court could not issue any refund of excess payment, not even were I to include cash currency as part of all of the payment method, as your court's policy also prohibited sending cash by mail as well.

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

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

Bank Arth .2001653542 Please find, enclosed a money order for \$76.25 for the file in both cases. 318-4603 7015-1730-0001 - With kind Regards, Tam, Sincerely Act & 2817 Soco Bunt USPS 07-01-2616 (File) Ordon Wayne Watts Money Order # 41742051 07-01-2016- for \$176.25 11etuna ecent und 591,-9413-0 134-546-1220 10 8



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

	5/16/2017	Re: *Public Records request: BUILDING Dept - City of Chicago*	
	From: DOBFOIA <dobfoia@cityofchicago.org> To: Gww1210 <gww1210@aol.com> Subject: Re: *Public Records request: BUILDING Dept- Date: Fri, Jun 3, 2016 9:41 am Attachments: 1720_N_Sedgwick.pdf (266K)</gww1210@aol.com></dobfoia@cityofchicago.org>	· City of Chicago*	
	Mr. Watts:		
	The records you requested are attached. Sincerely,		
	C. Lynch City of Chicago, Dept. of Buildings		
dingDept-FOIA-more-RECORDS_P	DF.pdf - Adobe Reader		
w Window Help			
🖻 🏟 🗎 🖨 🖂 🗎 🏵	€ 1 / 4 - € 130% ▼ ₩ ₽	🦻 🐼 🚺 Τοο	ols Sigr

5/16/2017

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

From: DOBFOIA <DOBFOIA@cityofchicago.org> To: gww1210 <gww1210@aol.com> Subject: Re: *Public Records request: BUILDING Dept - City of Chicago* Date: Fri, Apr 7, 2017 4:59 pm Attachments: 1720_N_Sedgwick1.pdf (17K), 1720_N_Sedgwick.pdf (17K)

Mr. Watts:

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

Sincerely,

C. Lynch City of Chicago, Dept. of Buildings

From: gww1210@aol.com <gww1210@aol.com> Sent: Friday, March 31, 2017 12:44:59 PM To: DOBFOIA; DOB-info Cc: DOBFOIA; Lynch, Chris; Porche, Rodney; gww1210@aol.com; gww1210@gmail.com Subject: Re: *Public Records request: BUILDING Dept - City of Chicago*

Chris, this is Gordon again.

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

5/16/2017

FW: Scanned from a Xerox multifunction device

From: FOIA < foia@chicagopolice.org>

To: Gww1210 <Gww1210@aol.com>

Subject: FW: Scanned from a Xerox multifunction device

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

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

Good Afternoon,

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

Regards,

FOIA Section

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

From: <u>xerox@chicagopolice.org</u> [<u>xerox@chicagopolice.org</u>] Sent: Tuesday, June 07, 2016 5:56 PM To: FOIA Subject: Scanned from a Xerox multifunction device

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

Attachment File Type: PDF

multifunction device Location: machine location not set Device Name: HQ-X414NE-1

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



September 18,2015

Dear Customer:

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

Delivery Information:			
Status:	Delivered	Delivery location:	333 W NORTH AVE Chicago, IL 60610
Signed for by: Service type: Special Handling:	JBLASSINGILL FedEx Ground	Delivery date:	Sep 15, 2015 13:51
	J. BLASSINGILL #28, 13:48, 1 Del, 0		

acking number:	781311007128	Ship date:	Sep 10, 2015
		Weight:	1.6 lbs/0.7 kg
cipient:		Shipper:	
nard B Daniggelis		Gordon Watts	
The UPS Store		Gordon Watts	
W North AVe		821 ALICIA RD	
icago, IL 60610 US		LAKELAND, FL 33801 US	3

Thank you for choosing FedEx.

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5/16/2017
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Freedom of Information Act Request 2016 FOIA 41830

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

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

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

Subject: Freedom of Information Act Request 2016 FOIA 41830

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

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

Dear Mr. Watts:

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

Very truly yours,

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

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

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

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

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

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

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

Dear Mr. Watts:

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

Very truly yours,	From: FOIAofficer <f@atg.< th=""><th>.state.il.us></th></f@atg.<>	.state.il.us>
	To: 'gww1210@aol.com	n' <gww1210@aol.com></gww1210@aol.com>
Caitlin Q. Knutte FOIA Officer	Cc: Possley, Maura <mf <pthompson@atg.< td=""><td>Possley@atg.state.il.us>; Boyce, Eileen <eboyce@atg.state.il.us>; Thomps: .state.il.us></eboyce@atg.state.il.us></td></pthompson@atg.<></mf 	Possley@atg.state.il.us>; Boyce, Eileen <eboyce@atg.state.il.us>; Thomps: .state.il.us></eboyce@atg.state.il.us>
	Subject: Freedom of Informa	ation Act Request 2016 FOIA 41830
	Date: Wed, Jun 1, 2016 1:	:13 pm
		Watts 2016 (1).pdf (5295K), 41830 RM - Gordon Watts 2016 (2).pdf (5864K) ng and Extension Letter.pdf (113K)
	Dear Mr. Watts:	
	Attached please find a letter an	nd records pertaining to your recent FOIA request.
		From: FOIAofficer <f@atg.state.il.us></f@atg.state.il.us>
	Very truly yours,	To: 'gww1210@aol.com' <gww1210@aol.com></gww1210@aol.com>
	Caitlin Q. Knutte	Cc: Possley, Maura <mpossley@atg.state.il.us>; Boyce, Eileen <eboyc <pthompson@atg.state.il.us></pthompson@atg.state.il.us></eboyc </mpossley@atg.state.il.us>
	FOIA Officer	Subject: Freedom of Information Act Request 2016 FOIA 41830 Date: Wed, Jun 8, 2016 2:29 pm
		Date: Wed, Jun 8, 2016 2:29 pm
		Attachments: 41830 RM - Joseph Younes.pdf (3296K), 41830 RM - Pleadings (1 41830 RM - Pleadings (2).pdf (2284K), 41830 RM - Pleadings (3).p

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



DEPARTMENT OF PLANNING AND DEVELOPMENT CITY OF CHICAGO

April 12, 2017

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

VIA ELECTRONIC MAIL: Gww1210@acl.com

Dear Mr. Watts:

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

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

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

Sincerely,

ins Tony Binns

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



April 26,2017

Dear Customer:

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

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

NO SIGNATURE REQUIRED

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

acking number:	7862-7122-6226	Ship date:	Apr 18, 2017
		Weight:	1.8 lbs/0.8 kg
pient:		Shipper:	
SEPH YOUNES LAV	V OFFICES	gordan watts	
SEPH YOUNES LAV	VOFFICES	gordan watts	
6 W WASHINGTON	ST	821 ALICIA RD	
E 600		LAKELAND, FL 3380)1 US
IICAGO, IL 60602 US	3		

Thank you for choosing FedEx.

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

	om m	
Tracking # 78627	1226226	
Ship date: Tue, 4/18/2017	Delivery exception	Scheduled delivery: Mon, 4/24/2017 by end of day
	Delivery exception	
Shipment Facts		
-	s unable to complete delivery of the	
Tracking number:	786271226226	
Status:	Delivery exception	
Service type:	FedEx Ground	
Packaging type:	Package	
Number of pieces:	1	
Weight:	0.70 lb.	
Standard transit:	4/21/2017	
-	ery Issues s not completed is outlined below. Iution recommendations are also	
provided.		
Exception Reason	Recommended Action	
1. Refused by recipient - Not ordered	No action is required. The package is being returned to the shipper.	
2. Shipment Refused by Recipient	No action is required. The package is being returned to the shipper.	

