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

CITY OF CHICAGO Plaintiff,) Case No.: 2017-M1-400775
Tiamum,) Case No.: 2017-W11-400773
vs.) Before: Hon. PATRICE MUNZEL
) BALL-REED, Associate Judge
1720 N SEDGWICK ST, ASSOCIATED BANK NA,) Case Type: HOUSING
NON-RECORD CLAIMANTS, UNKNOWN OWNERS,) District: First Municipal
Atty. Joseph Younes, Esq., et al.)
Defendants, and) TIME-SENSITIVE: to be heard
) in Court Room:1105, by 05/18/2017
Gordon Wayne Watts,) Court Time: 11:00am (CST)
Proposed Intervening Defendant.	

MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS

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

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

MEMORANDUM OF LAW:

PETITIONER IS ENTITLED TO INTERVENE AS A MATTER OF RIGHT.

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

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

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

Where intervention as of right is asserted, "the trial court's jurisdiction is limited to determining <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 Life Ins. Co.</u>, 127 Ill.App.3d 140, 144 (1st Dist. 1984). [Emphasis added in underline & bold; not in original] Petitioner satisfies all three requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3).

Newly-discovered facts of a dispositive nature

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

"Jordan Matyas, who represented the Old Town Triangle Association at Thursday's court hearing, said Younes was being disingenuous in saying he didn't intend to level the site. "He's told me twice that he always wanted to demolish it," Matyas said, and he told the judge that he intended to pursue a demolition permit as well. "So we have some mixed signals from the owner, but his actions speak clearly about his intent for the building."" [Source: "Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, *DNAinfo*, March 30, 2017: https://www.DNAinfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city] See also <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.]

Newly-discovered Eyewitness Testimony of a dispositive nature

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

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

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

Work done for Daniggelis

Mr. Daniggelis asked the undersigned Intervenor for assistance on a number of matters, including, but not limited to searching for, obtaining, and pass along many records (some court records, some publicly-accessible Internet records), sending them to him, and/or assistance on several unspecified technological/computer-related issues. [See also <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." City of Chicago v. John Hancock Mutual Life Ins. Co., 127 Ill.App.3d 140, 144 (1st Dist. 1984). [Enumeration and emphasis added in underline & bold; not in original] Petitioner satisfies all three requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3). [#1] This is timely; [#2] I doubt that anyone would doubt that the many new points Intervenor raises lack representation, as they are key facts that have not been addressed before, and this case could tip either way depending on my submitting (or not submitting) these key facts. However, is prong #3 satisfied?

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

Of course, should the court decline to grant intervention as of right, Watts; filings might be deemed *amicus curiae*, with the good-will intentions to help the court. Indeed, *Kinkel v. Cingular Wireless, L.L.C.*, 223 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.

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

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

- * CIVIL DIVISION: Richard J. Daley Center, 50 West Washington St., Room 601, Ph: (312) 603-5116, (312) 603-5122, (312)603-5252, Chicago, IL 60602, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays
- * Hon. Patrice Munzel Ball-Reed, Associate Judge, Civil Division, District 1 Housing Section, Daley Center, 50 W. Washington St., Rm. 1105, Chicago, Illinois 60602, Ph: (312) 603-4535 The number listed on Judge's page, ends in '4536': http://www.CookCountyCourt.org/JudgesPages/BallReedPatrice.aspx but clerk says that this is wrong number and goes to room 1107. [Note: I'm attempting to send both Judge Ball-Reed's courtesy copy <u>and</u> the Clerk's official copy to Emma J. Burse, Mail Room Manager (312-603-3117, EJBurse@CookCountyCourt.com), for <u>her</u> to deliver, since last time, my Priority mail to the judge got delayed.]

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

- * Joseph Younes Law Offices / http://ChicagoAccidentAttorney.net (312)635-5716, per website: 166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602; Phone: (312) 372-1122; Fax: (312) 372-1408. Email is (or was?) RoJoe69@yahoo.com per http://www.ZoomInfo.com/p/JosephYounes/599467626 Note: Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see e.g., EXHIBIT-C in the instant filing], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr. Younes & other litigants), and send me a nominal bill for said service, but, I doubt anyone would question me on this. In fact, Younes will have to get his service copy from his attorney, Hugh Howard, who uses the same mailing address: Younes' attorney Hugh Howard, c/o: Law Offices of Hugh D. Howard, 166 W Washington St, Suite 600, Chicago, Il 60602, Phone | 312-781-1002, Email | Hugh@HughDHowardLaw.com, per: http://www.HughDHowardLaw.com | 160602, Phone | 312-781-1002, Email | Hugh@HughDHowardLaw.com, per: http://www.HughDHowardLaw.com
- * Heavner Beyers Mihlar LLC, 111 E Main St #200, Decatur II, 62523, (217) 422-1719, (312)-999-9110 [Mailing Address: P.O. Box 740, Decatur, IL 62525, per http://www.HSBattys.com/page/about-us/] RickHeavner@hsbattys.com, JulieBeyers@hsbattys.com, FaiqMihlar@hsbattys.com, MeredithPitts@hsbattys.com
- * CR Realty Advisors, LLC, which has been appointed by the court as a temporary receiver on the property: 325 W. Huron, Suite 230, Chicago, IL 60654, P: 312.332.7100, F: 312.332.7102, E: info@cr-ra.com, per: http://www.cr-ra.com/contact/
- I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "Motion to Intervene by Intervenor, Gordon Wayne Watts," and its exhibits, were served upon all parties listed above, this __17th__ day of __May___, 2017 by the following methods:
- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford.
- E-mail: I may, later, serve all the parties listed above via email, in such cases as I have their e-mail address—as a courtesy. Or, then again, I may not (as it is not required), but if I serve any party electronically (via email), then I will serve <u>all</u> parties, so as to keep everybody in the loop.
- Internet: I shall, when practically possible, post a TRUE COPY of this filing and related filings online at my official websites, *infra-- linked at the "Mortgage Fraud" story, dated. Fri. 14 Apr. 2017.*

Signature:	Date:
Gordon Wayne Watts, Intervenor, or, in the altern	native, Amicus Curiae*
821 Alicia Road	
Lakeland, FL 33801-2113	
PH: (863) 688-9880	
Web: www.GordonWatts.com / www.GordonWay	yneWatts.com

 $Email: \underline{Gww1210@aol.com} \, / \, \underline{Gww1210@gmail.com}$

Date: Wednesday, 17 May 2017

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

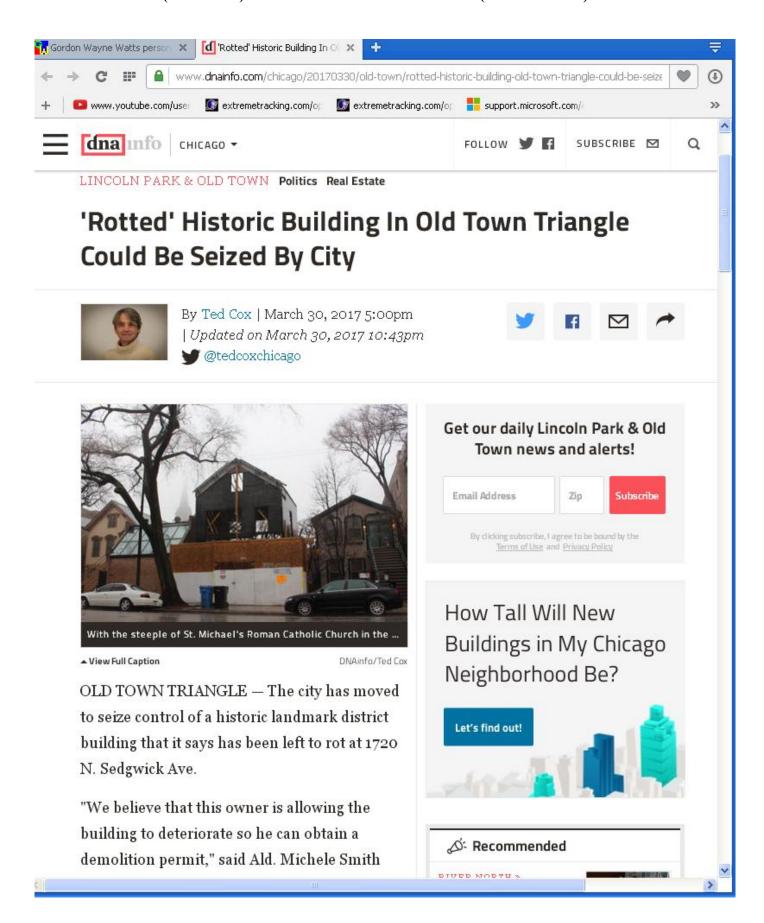
INDEX TO THE EXHIBITS

Instrument Docket/Tab# **DNAinfo news item (screenshot) Exhibit-A** A-1 (news item title) A-2 (section quoting Jordan Matyas, who effectively calls Younes a liar) Work done for Daniggelis Exhibit-B FOIA research (Freedom of Information Act requests for public records—and other services) B-1 (FOIA - 07/16/2015 grant of various Clerk of the Court, Cook Cty, IL, records) B-2 (FOIA – 07/24/2015 bill of \$104.68 to CHANCERY Division, Cook Cty, IL, records) B-3 (FOIA – 07/24/2015 bill of \$102.50, with date-stamp; Showing the \$104.68 before fees) B-4 (FOIA – 07/31/2015 bill of \$10.00, before fees; Showing \$10.21 after transaction fee) B-5 (FOIA – record: Credit Card statement, cover sheet, closing on 07/17/2015) B-6 (FOIA – 07/16/2015, Credit Card bill for \$21.19 Cook County, IL court records) B-7 (FOIA – 09/10/2015: \$11.50, Ship to Daniggelis via USPS) B-8 (FOIA – 12/03/2015: bill of \$33.19 to LAW Division, Cook Cty, IL, records) B-9 (FOIA – 01/13/2015: bill of \$2.25 to LAW Division, Cook Cty, IL, records) B-10 (FOIA – 01/21/2015: bill of \$13.28 to CIVIL, 1st Municiplal Division, Cook Cty, IL, records) (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)

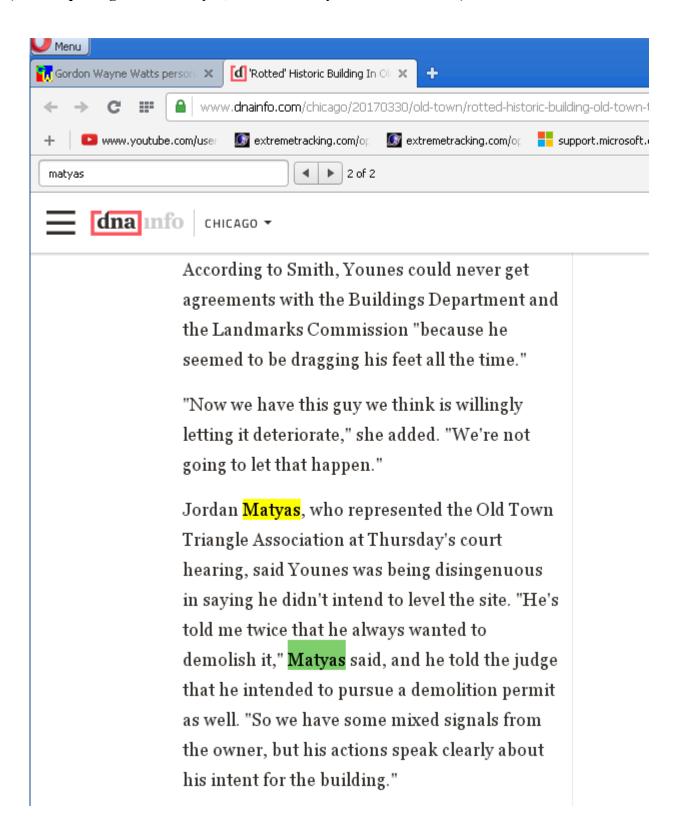
FedEx package refused by Atty. Joseph Younes

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)



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: gww1210@gmail.com

CC: Agww1210@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

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LexisNexis Payment Solutions

Page 1 of 1

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

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

ATTORNEY NO: 99500

REF CASE NO: 2004ch10851 REF OTHER: 2007CH

CASE TOTAL: \$102.50
Copy Fee
Record Searches
CREDIT CARD: \$1
CHANGE

RECEIPT 0001 OF 0001
TRANSACTION TOTAL: \$108

THANK YOU

THE HONORABLE DOROTHY BROWN CLERK OF THE CIRCUIT COURT COURT IL

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

ATTORNEY NO: 99500

REF CASE NO: 2007ch29738 REF OTHER:

CASE TOTAL: \$10.00 Copy Fee CREDIT CARD: CHANGE

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RECEIPT 0001 OF 0001 TRANSACTION TOTAL:

\$10.00

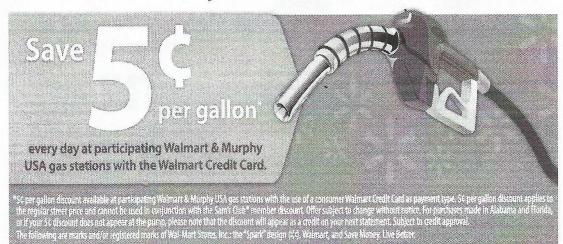
THANK YOU

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Agency	10.00
Expedite	0.00
Misc	0.00
VitalChek	0.21
Shipping	0.00
Other	0.00

Print Receipt



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



Walmart* MasterCard'

GORDON W WATTS

Account Number: xxxx xxxx xxxx 2738

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

\$3,564.38

\$110.00

08/10/2015

Summary of Account Activity

Previous Balance

- Payments
- + Purchases/Debits
- + Interest Charges

\$73.81 \$3.564.38

\$4,353.74

\$984.24

\$121.07

\$10,000

\$6,435

\$2,000

\$2,000

07/17/2015

New Balance

Credit Limit

Available Credit Cash Advance/Quick Cash Limit

Available Cash Statement Closing Date

Days in Billing Cycle

Payment Information

Payment Due Date

New Balance Total Minimum Payment Due

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

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

If you make no additional charges using this card and each month you pay	You will pay off the balance shown on this statement in about	And you will end up paying an estimated total of
Only the minimum payment	16 years	\$9,033.00
\$138.00	3 years	\$4,960.00 (Savings = \$4,073.00)

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

STATEM ENT

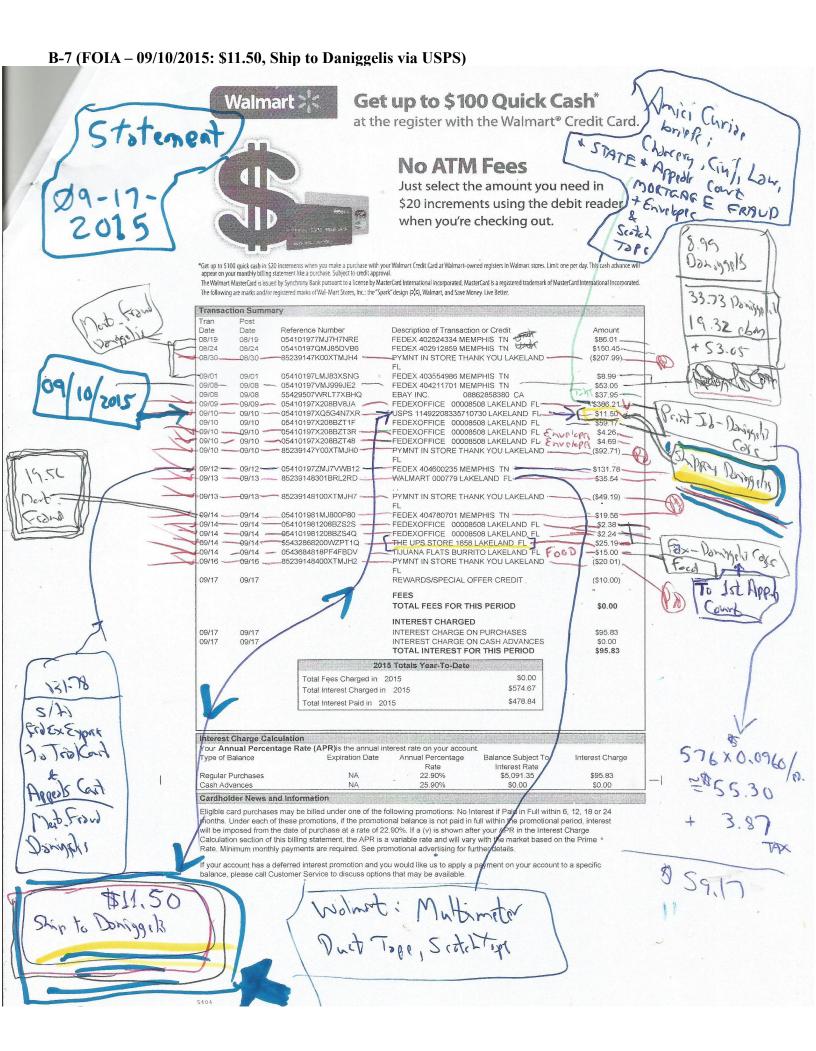
CREDIT

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

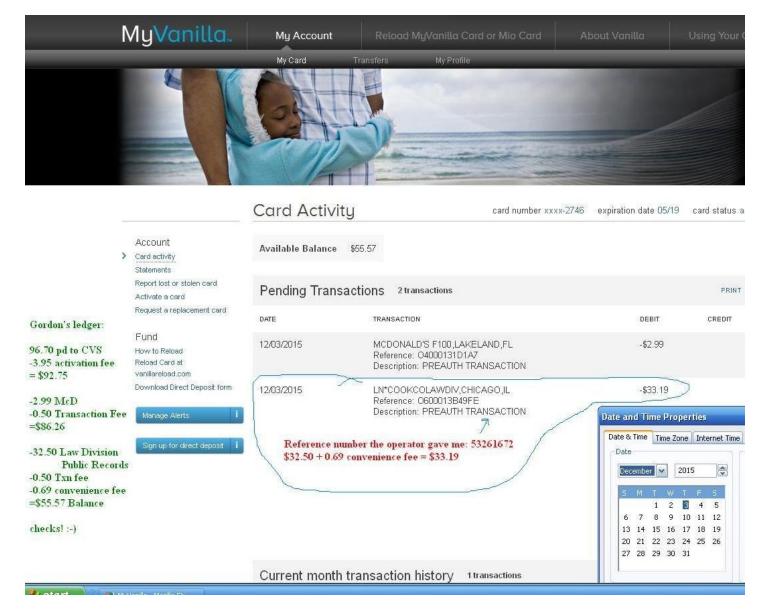


Earning Rewards is easy! Every time you earn \$5, you will receive a Rewards Credit on your statement! \$0 \$1 \$2 \$3

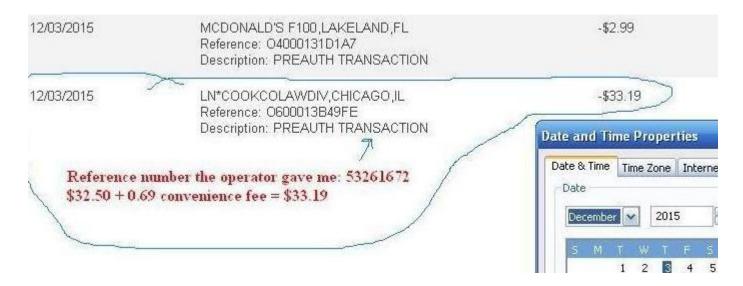
B-6 (FOIA – 07/16/2015, Credit Card bill for \$21.19 Cook County, IL court records) Restaurants Walmart > < Use your card everywhere And More! MasterCard® is accepted to Utilities Asia sam maa fall Entertainment Memberships *See the "Walmart MasterCard Rewards Program" terms for details. see the immunity measures are reviews regional remains a decision. The Walmant MasterCard in Sex edition of MasterCard international Incorporated. MasterCard is a registered trademark of MasterCard international Incorporated. The following are marks and/or registered marks of Wal-Mart Stores, inc.: the "Spark" design (x3), Walmart, and Save Money. Live Better. Transaction Summary Tran Post Reference Number Description of Transaction or Credit Amount Date Date PYMNT IN STORE THANK YOU LAKELAND (\$64.04) 85239145H00XTM.IH4 06/25 06/25 Semel 55541865K03SNMYRL INDO FOODMART O39 LAKELAND FI \$1.06-PYMNT IN STORE THANK YOU BARTOW (\$97.95) 06/30-06/30 85239145N00XTMJH7 (\$500.00) PYMNT IN STORE THANK YOU BARTOW 06/30 06/30 85239145N00XTMJK0 07/03 07/03 85239145S00XTMJH3 PYMNT IN STORE THANK YOU PLANT CITY (\$87.63) --FI \$32.36 05410195WMJ8GNAS8 FEDEX 498520395 MEMPHIS TN 07/07 07/07 55429505XRL52K8KE 07/08 07/08 08862858380 CA \$37.09 -PYMNT IN STORE THANK YOU LAKELAND (\$84.56) 07/08 85239145Y00XTMJH7 1 ms6A FEDEX 499124124 MEMPHIS TN () 054101963MJAH42K2-\$29.37 07/14 (\$150.06) 07/14 -07/14 85239146400XTMJH1 0543684660040FR0J COOK CO FIRST MUNICIPA CHICAGO IL \$21.19 FEES TOTAL FEES FOR THIS PERIOD \$0.00 INTEREST CHARGED INTEREST CHARGE ON PURCHASES INTEREST CHARGE ON CASH ADVANCES \$73.81 07/17 07/17 \$0.00 07/17 TOTAL INTEREST FOR THIS PERIOD \$73.81 2015 Totals Year-To-Date Total Fees Charged in 2015 \$0.00 CDON June 2015 Total Interest Charged in 2015 \$401.51 \$327.70 Total Interest Paid in 2015 Invoice Interest Charge Calculation Your Annual Percentage Rate (APR)is the annual interest rate on your account Interest Charge Balance Subject To Type of Balance **Expiration Date** Annual Percentage Interest Rate Rate \$73.81 Regular Purchases 22.90% \$3,921,55 \$0.00 NA 25.90% Cash Advances Cardholder News and Information Eligible card purchases may be billed under one of the following promotions: No Interest if Paid in Full within 6, 12, 18 or 24 months. Under each of these promotions, if the promotional balance is not paid in full within the promotional period, interest will be imposed from the date of purchase at a rate of 22.90%. If a (v) is shown after your APR in the Interest Charge Calculation section of this billing statement, the APR is a variable rate and will vary with the market based on the Prime Rate. Minimum monthly payments are required. See promotional advertising for further details. If your account has a deferred interest promotion and you would like us to apply a payment on your account to a specific balance, please call Customer Service to discuss options that may be available PUBLICRECORDS For Daniggelist \$ 21.19 Richard & Douggood: Public Record Regnest for Alar in 3 com or identical significant on 2 montation Door showing forgony, etc.

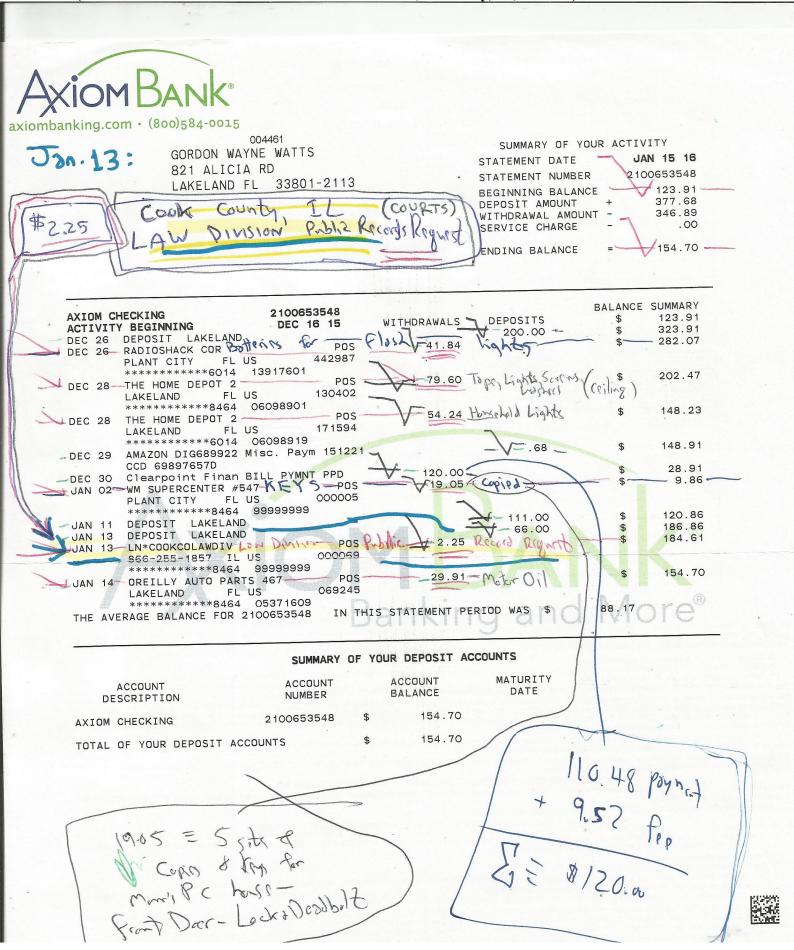


B-8 (FOIA – 12/03/2015: bill of \$33.19 to LAW Division, Cook Cty, IL, records)



ZOOM view:



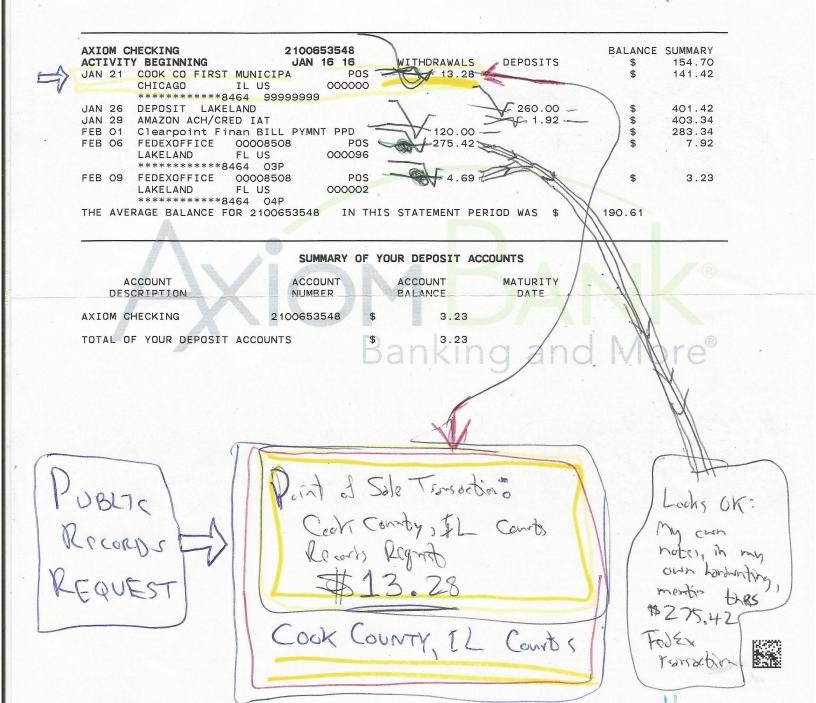


B-10 (FOIA – 01/21/2015: bill of \$13.28 to CIVIL, 1st Municiplal Division, Cook Cty, IL, records)



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

SUMMARY OF YOU	R ACTIVITY
STATEMENT DATE	FEB 15 16
STATEMENT NUMBER	2100653548
BEGINNING BALANCE	154.70
DEPOSIT AMOUNT	+ 261.92
WITHDRAWAL AMOUNT	- 413.39
SERVICE CHARGE	00
ENDING BALANCE	3.23



(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)



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

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

AXIOM CHECKING	2100653548	7		BALANCE SUMMARY
ACTIVITY BEGINNING MAY 14 3501 FLORIDA AVE LAKELAND FL L **********8464		WITHDRAWALS	DEPOSITS \$\forall 90.00 \leftarrow\$	\$.30 \$ 90.30
MAY 17 THE UPS STORE 2872 CHICAGO IL U	PDS 000008	20.64 Ship	off torisher	\$ 69.66
MAY 18 DEPOSIT LAKELAND MAY 26 THE UPS STORE 1053 CHICAGO IL U ************************************	PDS 000000	9.60	95.00	\$ 164.66 \$ 155.06
MAY 31 AMAZON DIG738757 I CCD 76149970D		1	5 2.17	\$ 157.23
MAY 31 Clearpoint Finan E THE AVERAGE BALANCE FOR 2		120.00 S STATEMENT PERIO	D WAS \$	\$ 37.23 86.33
	SUMMARY OF Y	OUR DEPOSIT ACCOU	NTS	/ R
ACCOUNT	ACCOUNT		MATURITY	
DESCRIPTION	NUMBER	BALANCE	DATE	
AXIOM CHECKING	2100653548 \$	37.23	1-	R A G
TOTAL OF YOUR DEPOSIT ACCO	DUNTS \$	an 37 23n C	and	More
		W		06=
	Rost	and for	1 2/2	POINT
	657	Daniger / :	- \	5019

Ship some research of records to Rich Daniggelis

UPS Store # 2872 (chicagost) \$20.64

Pay for Printonts of more REcurps research

UPS Store #1053 (Chicagost) \$9.60

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

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

50-0001-2318-468

9590 9403-0734-5196123868

	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
	110 , 1 / 14/
	(312) 793-5484, Office Hours: 8:30am – 4:30pm (CST)
	Re: GMAC Mortgage, LLC v. Richard B. Daniggelis, et al. Case No: 1-14-2751 Friday, 01 July 2016 Axiom 6 xx
	Atty, Joseph Younes, Esq. v. Richard B. Daniggelis, et al.
	BALACT - 17/142051
	Dear Attorney Schillaci: 2001 653548 01/2016 \$ \$ 76.25
1	Dear Attorney Schillaci: 2001 65 35 48 07/01/2016 \$ \$ 76.25
	Thank you for speaking with me last Friday morning (Fri. 24 June 2016) and this past Tuesday
	evening (Tue. 28 June 2016), and giving me the proper protocol and procedures for making a records
	request of court filings in your court with regard to the two court cases cited above. I am sorry that I am
	somewhat slow to respond, but I have been busy with many things recently.
	According to my recollection and notes, it would appear that you told me that the entire file in 1-14-
	2751 contained 172 pages, which, at \$0.25/page, would cost me \$43.00 even, and that 1-15-0662 contained
	133 pages, which would cost me \$33.25, for a sum total of \$76.25, and that your court only accepted
	payment by cash, check, or money order, payable to "Clerk of the Appellate Court" (but had not yet set up payment by credit card or bank account electronic draft), and, also, that your court did not prefer to deal in
	case for obvious reasons of security and documentation of the currency. — You also said that if I were short,
	you could not advance credit, and would require payment in advance Moreover, my notes reflect that if
	the opposite was the case (overpayment), you warned and cautioned me that your court could not issue any
	refund of excess payment, not even were I to include cash currency as part of all of-the payment method, as
	your court's policy also prohibited sending cash by mail as well.
	Because of that, I must get the payment amount "exact" or else risk over-payment (with no avenue
	or means for giving me change back for overpayment) or under-payment (where I can't get all the records I
	seek). For that reason, I made a call to your court to ascertain & determine whether any new filings or court
	orders had been entered into the record on appeal in either of the 2 above-captioned cases. After several
	unsuccessful tries (one time, a clerk said a motion was due on a certain date, but never answered my
	question about one case, and then hung up before I could inquire about the other case – meaning, she never
	answered me at all!), I finally determined that nothing new had been entered in either of these 2 cases since we spoke last week.
	I wish you the best in getting your court set up for electronic payment (of "records request" fees) by
	Credit Card; electronic release of records (by email in PDF or image format in email attachments, like the
	trial courts currently do); and online dockets (preferably with click-to-see of an image of the docket entry,
	but at least a docket of the entries, like the trial courts currently provide the public)
	Bank Auth
	Please find, enclosed a money order for \$76.25 for the file in both cases. 2001 65 35 48
1	015-1731-0001- With kind Regards, Pam, Sincerely, Many order (Axion)
	012-1)30-0001- With kind Regards, Tam, Sincerely (Many Order Axiom)
11	SP(07-01-76)//
	015_1730-0001- With kind Regards, I am, Sincerely Mayor Order Axiom Act 28175080 Books Axiom Act 28175080 Books Overdon Wayne Watts Onch 2016 for \$1742051
0	07-01-2016-torx 11 1625
1(0)	with occupt well 5911-9413-0734-5146-1220 10 8
~ ~ ~	



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

tingDept-FOIA-more-RECORDS_PDF.pdf - Adobe Reader
w Window Help

5/16/2017

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

Tools

Sign

From: DOBFOIA < DOBFOIA@cityofchicago.org>
To: gww1210 < gww1210@aol.com>

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

130%

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

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

Mr. Watts:

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

Sincerely,

C. Lynch

City of Chicago, Dept. of Buildings

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

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

To: DOBFOIA; DOB-info

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

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

Chris, this is Gordon again.

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

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

5/16/2017

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

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

To: FOIA

Subject: Scanned from a Xerox multifunction device

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

Attachment File Type: PDF

multifunction device Location: machine location not set

Device Name: HQ-X414NE-1

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



September 18,2015

Dear Customer:

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

FedEx Ground

Delivery Information:

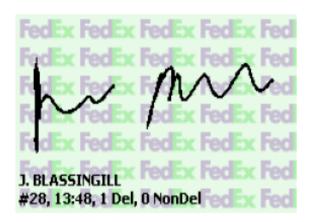
Status: Delivered Delivery location: 333 W NORTH AVE

Chicago, IL 60610

Signed for by: JBLASSINGILL Delivery date: Sep 15, 2015 13:51

Special Handling:

Service type:



Shipping Information:

Tracking number: 781311007128 Ship date: Sep 10, 2015

Weight: 1.6 lbs/0.7 kg

Shipper:

Recipient:

Richard B Daniggelis Gordon Watts
c/o The UPS Store Gordon Watts
333 W North AVe 821 ALICIA RD

Chicago, IL 60610 US LAKELAND, FL 33801 US

Thank you for choosing FedEx.

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

5/16/2017

Freedom of Information Act Request 2016 FOIA 41830

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

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

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

<PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

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

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

Dear Mr. Watts:

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

Very truly yours,

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

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

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

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

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

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

Caitlin Q. Knutte Cc: Possley, Maura <MPossley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompsc FOIA Officer <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

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

Attachments: 41830 RM - Gordon Watts 2016 (1).pdf (5295K), 41830 RM - Gordon Watts 2016 (2).pdf (5864K)

41830 Partial Closing and Extension Letter.pdf (113K)

Dear Mr. Watts:

Caitlin Q. Knutte

FOIA Officer

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

From: FOIAofficer <F@atg.state.il.us> Very truly yours,

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

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

Subject: Freedom of Information Act Request 2016 FOIA 41830

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

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



DEPARTMENT OF PLANNING AND DEVELOPMENT CITY OF CHICAGO

April 12, 2017

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

VIA ELECTRONIC MAIL: Gww1210@aol.com

Dear Mr. Watts:

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

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

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

Sincerely,

Tony Binns V .
Freedom of Information Officer

City of Chicago Department of Planning and Development

(312) 744-0986

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



April 26,2017

Dear Customer:

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

Delivery Information:

Status: Delivered Delivery location: 821 ALICIA RD

Lakeland, FL 33801 Apr 26, 2017 09:53

Signed for by: Signature not required

Service type: FedEx Ground

Special Handling:

NO SIGNATURE REQUIRED

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

Delivery date:

Shipping Information:

 Tracking number:
 7862-7122-6226
 Ship date:
 Apr 18, 2017

 Weight:
 1.8 lbs/0.8 kg

Recipient:

JOSEPH YOUNES LAW OFFICES JOSEPH YOUNES LAW OFFICES 166 W WASHINGTON ST STE 600

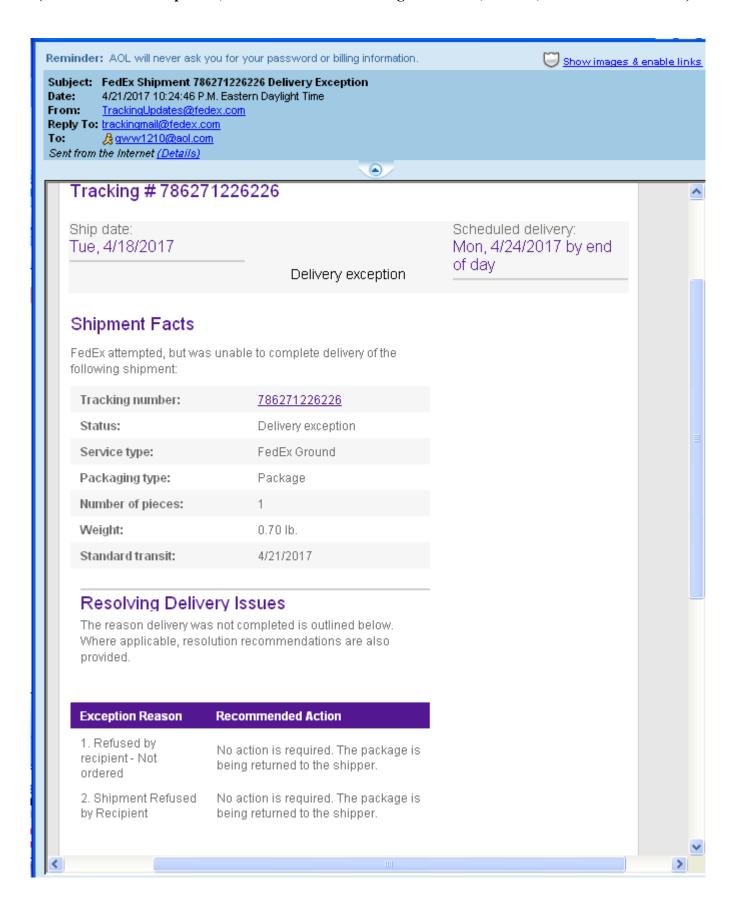
CHICAGO, IL 60602 US

Shipper: gordan watts

gordan watts 821 ALICIA RD

LAKELAND, FL 33801 US

Thank you for choosing FedEx.



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

