

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

GORDON WAYNE WATTS,

Plaintiff,

v.

**Case No: 8:19-cv-829-T-36CPT**

CIRCUIT COURT OF COOK COUNTY,  
ILLINOIS, JAMES P. FLANNERY, JR.,  
DIANE M. SHELLEY, MICHAEL F.  
OTTO, APPELLATE COURT OF STATE  
OF ILLINOIS, DANIEL J. PIERCE,  
MARY L. MIKVA, JOHN C. GRIFFIN,  
MARY ANNE MASON, TERRENCE J.  
LAVIN, MICHAEL B. HYMAN and CARL  
ANTHONY WALKER,

Defendants.

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**CERTIFICATE OF INTERESTED PERSONS  
AND CORPORATE DISCLOSURE STATEMENT**

**I hereby disclose the following pursuant to this Court's interested persons order:**

**1.)** the name of each **person, attorney,** association of persons, firm, **law firm,** partnership, and corporation that has or may have an interest in the outcome of this action — including subsidiaries, conglomerates, affiliates, parent corporations, publicly-traded companies that own 10% or more of a party's stock, and all other identifiable legal entities related to any party in the case:

**[insert list]**

\* **Atty. Joseph Younes (Atty#:55351)** Law Offices / <http://ChicagoAccidentAttorney.net>  
312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E:  
[RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596  
Home Address: Joe Younes: 2625 West Farewell Avenue, Chicago, IL 60645-4522  
[JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)

\* **Why he has or may have an interest in the outcome of this action:** If and when This Court enjoins ILLINOIS State Courts from the civil rights violations enumerated in this

Federal Complaint, they will likely be more willing to grant Substantive Due Process in the state actions, which would, necessarily, take Richard Daniggelis' house from Younes and give it back to Daniggelis—or maybe faster if Declaratory Relief is granted.

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

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

<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

\* **Why he has or may have an interest in the outcome of this action:** Mr. King was, and continues to be, Younes' attorney in **all** the state actions (see “related cases” disclosure, both a separate document, and comments in the complaint) – except the Code Violation case, where Hugh Howard is and/or was his attorney there. (Atty. Howard may have withdrawn—not sure from looking at online docket.)

\* **Atty. Hugh Howard (Atty#:33492),** [Hugh@HughDHowardLaw.com](mailto:Hugh@HughDHowardLaw.com) ;

[HowardHughD@Gmail.com](mailto:HowardHughD@Gmail.com), [HughHowardWeb@gmail.com](mailto:HughHowardWeb@gmail.com) ; c/o: Law Offices of Hugh D. Howard, 166 West Washington St, Suite 600, Chicago, IL 60602-3596, Ph:312-781-1002,

\* **Why he has or may have an interest in the outcome of this action:** Mr. Howard was Younes' attorney, for the Code Violation case involving Daniggelis' house, and may still be (depending on whether he withdrew: I can't tell from the online docket.) MOREOVER, if you look at the address, you'll see that Atty. Howard and Atty. Younes share the same physical mailing address: They apparently are Law Partners, so anything that affects Younes also affects Howard—especially if Daniggelis' house is taken away from Younes, and the *City of Chicago v. Younes, et. al.* collapses (see related cases info).

\* **Former ILLINOIS Atty. Paul L. Shelton, (Atty. #15323, disbarred per IARDC)** E-mails: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351 – Last-known phone number: (630)842-0126

\* **Why he has or may have an interest in the outcome of this action:** Mr. Shelton was Younes' law partner during the time that Daniggelis had his house stolen via title theft, and guilty or innocent, court records show Shelton was the one who did the warranty-deed transfer of title, thus implicating him.

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291, last known emails are as follows: [Erika\\_Rhone@Yahoo.com](mailto:Erika_Rhone@Yahoo.com), [ERhone@AFLAC.com](mailto:ERhone@AFLAC.com), and [RhoneE@gmail.com](mailto:RhoneE@gmail.com) on information and belief, and via trial and error from returned email process of elimination

\* **Why she has or may have an interest in the outcome of this action:** Ms. Rhone was working with Younes and Shelton (see documentation in EXHIBIT-E) in the Daniggelis title-theft matter, which was the matter in which the defendant slighted a lot of victims of their Federal Civil Rights--the subject of this suit. She may be liable, and definitely was a witness.

\* **Atty. Rosa M. Tumialán** ([RTumialan@Dykema.com](mailto:RTumialan@Dykema.com)) (312) 876-1700, DYKEMA

GOSSETT PLLC, 10 South Wacker Drive, Suite 2300 Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]

\* **Why she has or may have an interest in the outcome of this action:** Ms. Tumialán is an attorney of record for GMAC, the plaintiff in the original suit in which Defendant parties to this case aided & abetted the title theft of said house.

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

\* **Why she has or may have an interest in the outcome of this action:** Ms. Williams is an attorney of record for GMAC, the plaintiff in the original suit in which Defendant parties to this case aided & abetted the title theft of said house.

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

\* **Why he has or may have an interest in the outcome of this action:** Mr. Indyke is an attorney of record for GMAC, the plaintiff in the original suit in which Defendant parties to this case aided & abetted the title theft of said house.

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

\* **Why Associated Bank has or may have an interest in the outcome of this action:** This bank, apparently (on information, belief, and research of the court docs in question) is the current holder of the mortgage in question, and thus the plaintiff-proper in the proceedings where “GMAC Mortgage” was the original state-court plaintiff.

\* **Stewart Title, Attn: Leigh Curry**

<http://www.Stewart.com/en/stc/chicago/contact-us/contact-us.html>

2055 W. Army Trail Rd., STE 110, Addison, IL 60101 [ph:(630) 889-4050]

\* **Why Stewart Title has or may have an interest in the outcome of this action:** While I do recall that this firm was allowed to withdraw from the case, via a “stipulated” (agreed to) order, dated November 09, 2012 in the Chancery related case (so listed) they, nonetheless, may be guilty of crimes and/or have first-hand witness knowledge.

\* **COHON RAIIZES®AL LLP (90192) (Atty and/or Law Firm for STEWART TITLE ILLINOIS)** Attn: Carrie A. Dolan, 208 S LASALLE#1860, CHICAGO IL, 60604 [ph:(312) 726-2252] Email: [CDolan@CohonRaizes.com](mailto:CDolan@CohonRaizes.com)

\* **Why Stewart Title's attorney of record, Carrie Dolan, has or may have an interest in the outcome of this action:** While I do recall that this firm was allowed to withdraw from the case, via a “stipulated” (agreed to) order, dated November 09, 2012 in the Chancery related case (so listed) they, nonetheless, may be guilty of crimes and/or have first-hand witness knowledge.

**2.)** the name of every other entity whose publicly-traded stock, equity, or debt may be substantially affected by the outcome of the proceedings:

[insert list]

\* **City of Chicago, CORPORATION COUNSEL**, Attn: City of Chicago, Department of Law: Building & License Enforcement Unit: 30 N LASALLE 700, CHICAGO IL 60602-2503 Ph: 312-742-0200; 312-744-7764, Attn: Greg Janes (Atty.#:90909) 312-744-9555, Glenn Angel, 312-744-4033, 312-744-8791 [GJanes@CityOfChicago.org](mailto:GJanes@CityOfChicago.org), [Greg.Janes@cityofchicago.org](mailto:Greg.Janes@cityofchicago.org), [GAngel@CityOfChicago.org](mailto:GAngel@CityOfChicago.org), [Glenn.Angel@CityOfChicago.org](mailto:Glenn.Angel@CityOfChicago.org), [Benna.Solomon@CityOfChicago.org](mailto:Benna.Solomon@CityOfChicago.org), [Edward.Siskel@CityOfChicago.org](mailto:Edward.Siskel@CityOfChicago.org)

\* **Why The City of Chicago has or may have an interest in the outcome of this action:** They are suing Atty. Joseph Younes in the related code case (see related cases info), which is the house and land actually owned by Richard Daniggelis, whose house was stolen in Mortgage Fraud title-theft, powered by a documented forged photocopy felony fraud signature. Since Younes is not the rightful owner, This Court's action, forcing Due Process and Equal Protection in the state actions, might (probably will) return Daniggelis' house to him, thus making this Code Violation case *Void Ab Initio*, upon entry of said order(s).

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

<https://www.MersInc.org/aboutus/about-us> a nominee for HLB Mortgage, (703) 761-0694 / (800)-646-MERS (6377) / 888-679-MERS (6377) ATTN: Sharon McGann Horstkamp, Esq., Corporate Counsel, Mortgagee: <https://www.MersInc.org/component/content/article/8-about-us/401-sharon-horstkamp> Senior Vice President, Chief Legal and Legislative Officer, and

Corporate Secretary for MERSCORP Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ; [SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, [JanisS@MersCorp.com](mailto:JanisS@MersCorp.com) 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ; [SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512

\* **Why MERS has or may have an interest in the outcome of this action:** They were a party in the state court action, and had some oversight over the fraudulent title transfer, and thus may have both liability and/or ability to offer expert and/or first-hand eyewitness testimony, documentation, etc.

**3.)** the name of every other entity which is likely to be an active participant in the proceedings, including the debtor and members of the creditors’ committee (or twenty largest unsecured creditors) in bankruptcy cases:

**[insert list]**

No other known “entities,” besides those listed above and below.

**4.)** the name of each victim (individual or corporate) of civil and criminal conduct alleged to be wrongful, including every person who may be entitled to restitution:

**[insert list]**

\* **Richard B. Daniggelis** [true owner of house & land at 1720 North Sedgwick Street, Chicago, IL 60614-5722] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

\* **Why he has or may have an interest in the outcome of this action:** Mr. Daniggelis is a victim of mortgage fraud, due to the collusion between the circuit court and appellate court named as defendants, and also cooperation, if not collusion, by Atty. Joseph Younes, the unlawful recipient of title to Daniggelis' house.

\* **Myself, Gordon Wayne Watts, lead plaintiff.** (Contact info on file with the court.)

\* **Why I have or may have an interest in the outcome of this action:** Mr. Daniggelis owes me a large amount of monies as documented in the 7-7-2017 Intervention action in the state courts being sued {{see EXHIBIT-L}}, and if he's harmed, then he's much less likely to be able to pay me what he owes me. Additionally, Mr. Daniggelis is like a grandfather to me, and any harm that accrues to him has, is, and undoubtedly will psychologically, spiritually, mentally, and emotionally harm me—not to mention physical health taking a hit due to the

stress, and additional financial losses due to “time off” to file this tedious, difficult federal suit. (Do I get attorney's fees if I win? I don't know, but this is costing me a lot to print up and deliver to the court, as well as previous costs serving parties, posting online, time off, etc.)

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

\* **Why he has or may have an interest in the outcome of this action:** Mr. Galic was Daniggelis' attorney for much, if not most, of the proceedings in question in the courts being sued for many civil torts. I am told by Daniggelis that Galic did a lot of *pro bono* (free) work, with the hopes of obtaining a percentage of recovery, so, of course, Galic has huge inte

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: More's name is misspelled on one of the state court dockets as: “MOORE ROBERT”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [Note: This is a Google-voice phone number, and seems to be unable to receive phone calls, or at least that has been my experience: Outgoing calls, only.]

\* **Why he has or may have an interest in the outcome of this action:** Mr. More was not only a tenant of Daniggelis for a while, but I also represent to This Court that More has repeatedly told me that he, also, has done much research for Daniggelis, and feels that he is owed monies.

I hereby certify that, except as disclosed above, I am unaware of any actual or potential conflict of interest involving the district judge and magistrate judge assigned to this case, and will immediately notify the Court in writing on learning of any such conflict.

**Date:** \_\_\_\_\_ (Day of Week) ,     **Respectfully submitted,**

**the** \_\_\_\_\_ **day of** \_\_\_\_\_ , 2019

\_\_\_\_\_  
[Signature of Counsel of  
Record or Pro Se Party]

Typed Name of Counsel:                    Gordon Wayne Watts, non-lawyer, proceeding *pro se*  
Florida Bar Identification Number (if admitted to practice in Florida): – N/A  
Firm or Business Name:                    **The Register** (non-profit, online blog: links below)  
Mailing Address:                            2046 Pleasant Acre Drive  
City, State, Zip Code:                    Plant City, FL 33566-7511  
Telephone Number(s):                    (863)687-6141 and (863)688-9880  
Facsimile Phone Number (if available): – N/A  
E-mail address(es):                        [Gww1210@Gmail.com](mailto:Gww1210@Gmail.com) and [Gww1210@aol.com](mailto:Gww1210@aol.com)  
Official website(s):                        <https://GordonWatts.com> and <https://GordonWayneWatts.com>

**Certificate of Service**

I, **GordonWayne Watts**, hereby certify that I have filed a copy of this motion (“CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT”) with the clerk of the Circuit Court, Middle District of Florida, Tampa Division, this \_\_\_\_\_ day of \_\_\_\_\_, 2019, but on no one else, as I am filing *In Forma Pauperis*, and am depending – with full faith and credit – upon The Court to authorise and order the U.S. Marshall Service to serve all other parties of record.

**Date:** \_\_\_\_\_ (Day of Week) ,

the \_\_\_\_\_ day of \_\_\_\_\_, 2019

**Respectfully submitted,**

\_\_\_\_\_  
[Signature of Counsel of  
Record or Pro Se Party]

Typed Name of Counsel: Gordon Wayne Watts, non-lawyer, proceeding *pro se*  
Florida Bar Identification Number (if admitted to practice in Florida): – N/A  
Firm or Business Name: ***The Register*** (non-profit, online blog: links below)  
Mailing Address: 2046 Pleasant Acre Drive  
City, State, Zip Code: Plant City, FL 33566-7511  
Telephone Number(s): (863)687-6141 and (863)688-9880  
Facsimile Phone Number (if available): – N/A  
E-mail address(es): [Gww1210@Gmail.com](mailto:Gww1210@Gmail.com) and [Gww1210@aol.com](mailto:Gww1210@aol.com)  
Official website(s): <https://GordonWatts.com> and <https://GordonWayneWatts.com>