



OFFICE OF THE ATTORNEY GENERAL  
STATE OF ILLINOIS

June 8, 2016

**Lisa Madigan**  
ATTORNEY GENERAL

VIA ELECTRONIC MAIL  
Mr. Gordon Wayne Watts  
*The Register*  
821 Alicia Road  
Lakeland, Florida 33801  
gww1210@aol.com

RE: Freedom of Information Act Request  
2016 FOIA 041830

Dear Mr. Watts:

Thank you for writing to the Office of the Illinois Attorney General with your request for information pursuant to the Freedom of Information Act (FOIA) (5 ILCS 140/1 *et seq.* (West 2014)).

In an e-mail received on May 11, 2016, you requested "any and all public records that you have on the following individuals and entities:"

Lessie Towns  
Paul Shelton  
Trust One  
Richard Daniggelis  
Joseph Younes  
Gordon Wayne Watts (yes, myself!)

As a point of reference, this is related to the Lessie Towns and Richard Daniggelis cases, for which I am doing investigate reporting, as linked in the front-page news on the Tue. 01 Dec. 2015 news item on my "namesake" blog, *The Register*, and titled: "Courts \* Chicago Courts refuse to help elderly ["Mortgage Rescue Scam' victim; make him homeless." (Underscore and italics in original.)

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On May 18, 2016, this office advised you that we had conducted a search, and we located responsive records related to Paul Shelton, Trust One, Joseph Younes, and Gordon Wayne Watts. We located no other records responsive to your request.

In the same response, with regard to the records we located, we extended the time within which to respond to your request by five business days, as allowed by sections 3(e)(i) and 3(e)(v) of FOIA (5 ILCS 140/3(e)(i), (v) (West 2014)), because the requested records were stored at other locations than the office having charge of the requested records and the records required further examination to determine if they were exempt from disclosure or should be released with appropriate redactions.

Per our telephone conversation on May 19, 2016, you agreed to narrow your request for investigation records to only seek pleadings. Additionally, you agreed that we could provide you with the responsive records in a rolling fashion, beginning May 25, 2016, until production was completed. On May 25, 2016, and May 31, 2016, we provided you with the first and second sets of responsive records.

Today, we are providing you with the third and final set of responsive records, which includes records related to Paul Shelton, Trust One, Joseph Younes, and Lessie Towns. Accordingly, this letter shall serve to close your file. With regard to the records we are providing today, your request is granted in part and denied in part. We have redacted unique identifiers as "private information," as that term is defined in section 2(c-5) of FOIA (5 ILCS 140/2(c-5) (West 2014)). "Private information" is exempt from disclosure under section 7(1)(b) of FOIA. 5 ILCS 140/7(1)(b) (West 2014). Specifically, we have redacted signatures (*see* Ill. Att'y Gen. PAC Req. Rev. Ltr. 12046, issued June 23, 2011), personal mailing addresses, and personal telephone numbers.

Some responsive records, however, are being withheld pursuant to section 7(1)(f) of FOIA. 5 ILCS 140/7(1)(f) (West 2014). Section 7(1)(f) of FOIA exempts from disclosure "[p]reliminary drafts, notes, recommendations, memoranda, and other records in which opinions are expressed, or policies or actions are formulated[.]" The records that we have determined are exempt under this section consist of legal research materials compiled by this office for the purpose of planning courses of action with regard to Paul Shelton and/or Trust One Mortgage. All of these materials are predecisional. They are exempt under the rationale that public bodies must be able to evaluate information internally and explore possible courses of action confidentially before making final determinations that should be shared with the public. *See Harwood v. McDonough*, 344 Ill. App. 3d 242, 247 (2003) ("as a matter of public policy, section 7(1)(f) exempts from disclosure predecisional materials used by a public body in its deliberative process"). Accordingly, some responsive records are exempt from disclosure under section 7(1)(f).

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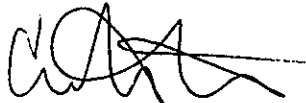
You have a right to have the partial denial of your request reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. 5 ILCS 140/9.5(a) (West 2014). You may file your request for review with the PAC by writing to:

Sarah Pratt  
Public Access Counselor  
Office of the Illinois Attorney General  
500 South 2nd Street  
Springfield, Illinois 62706  
Fax: (217) 782-1396  
publicaccess@atg.state.il.us

If you choose to file a request for review with the PAC, you must do so within 60 calendar days of the date of this partial denial letter. 5 ILCS 140/9.5(a) (West 2014). Please note that you must include a copy of your original FOIA request and of this partial denial letter when filing a request for review with the PAC.

You also have the right to judicial review of your partial denial by filing suit in the appropriate Illinois court. 5 ILCS 140/11 (West 2014).

Very truly yours,



CAITLIN Q. KNUTTE  
Assistant Attorney General  
FOIA Officer

CQK:ga

Attachments

cc: Maura Possley, Communications Director  
Office of the Illinois Attorney General

Eileen Boyce, Press Secretary  
Office of the Illinois Attorney General

Annie Thompson, Deputy Press Secretary  
Office of the Illinois Attorney General