

AFFIDAVIT

STATE OF ILLINOIS
COUNTY OF COOK

Before me, the undersigned Notary, on this _____ day of _____, 2016, personally appeared Richard B. Daniggelis, known to me to be a credible person and of lawful age, who first being duly sworn, upon his oath, deposes and says:

AFFIANT STATEMENT:

I, **Richard B. Daniggelis**, declare (certify, verify, and state) under penalty of perjury under the laws of the United States of America and the State of Illinois that the the following statement is true and correct to the best of my knowledge: I, Richard B. Daniggelis, am the owner of the property (the land and the house) at 1720 N. Sedgwick Street, Chicago, IL 60614-5722, in the Old Town neighborhood, which used to belong to my grandfather. (See attached deed, below – **RICHARD, please go get that**) – **Joseph Younes**, a former law partner of **Paul L. Shelton**, per Mr. Shelton, took possession of my house and land, based on a Warranty Deed which had a forged signature purporting to be my signature—and for which I never received any payment.

FURTHER AFFIANT SAYETH:

[[INTRO]] I executed a “Fraudulent Document Notice” to both the Cook County Recorder's office (doc number: 0711039132, on Friday, 04/20/2007) and to the trial court (exhibit 'F' of the Tuesday, July 30, 2008 filing by Atty. Benji Philips, in 2007-CH-29738, in Chancery) that the July 09, 2006 Warranty Deed (doc no: 0622826137 at the Recorder's Office, on Wednesday, 08/16/2006) was a forgery. (See both documents, below: **Both the 'unofficial' copy from the website, as well as the 'official' copy EXHIBIT 'F' copy from court filings**) On Saturday, 29 October 2014, I executed a more-detailed 14-point forgery affidavit in the 10-29-2014 Electronic Filing in **Younes v. GMAC** (case number 2014-M1-701473, in the CIVIL Division of Cook County, IL trial court, EXHIBIT 'A': See the attachment, below). Initially, no one believe my “Mortgage Rescue Scam” story that my signature was forged, preferring, instead, to side with **Mr. Younes and Mr. Shelton**, both of whom were *allegedly* working with me to merely refinance my mortgage. **However, I state, for the record, that numerous recent events support my claims that there was, indeed, a MORTGAGE FRAUD and the related “Mortgage Rescue Scam”:**

(#1) On Wednesday, 11-17-2010, the **IDFPR (Illinois Department of Financial and Professional Regulation)**, in case numbers 2009-MBR-128-b and 2009-LO-26-b, stripped **Mr. Shelton** of his ILLINOIS Mortgage Loan Originator License – **and imposed a Lifetime Ban on Mr. Shelton for Mortgage Fraud.** (See below for documentation of this.)

(#2) On Monday, September 14, 2015, the **IARDC (Illinois Attorney Registration & Disciplinary Commission)**, in Commission No. 2013-PR-00039, stripped **Mr. Shelton** of his ILLINOIS Law License for – among other things – **Mortgage Fraud (direct quote: “engaging in a criminal act by fraudulently notarizing a release of mortgage, [and] making false statements to a tribunal”)**, and “found the Administrator proved by clear and convincing evidence that **Respondent [Shelton] engaged in most of the misconduct charged,**” resulting in **Shelton being disbarred.** (See below.)

(#3) **Lisa Vitek, who was the wife of Paul L. Shelton**, made false statements, in court, about me and fraudulently notarized my signature, falsely claiming that she witnessed me sign some paperwork. More recently, on Monday, 12-21-2015, Ms. Vitek (and others) were ordered to comply with a subpoena to appear for depositions in **GMAC v. Younes, 2007-CH-29738**, in the LAW DIVISION of Cook County, IL trial courts, before Hon. Sanjay T. Tailor. (See below for documentation.)

(#4) Looking at the “Lost Assignment Affidavit” that was submitted as 'Exhibit B' of Atty. Andjelko Galic's Monday, 11/21/2011 “Motion for Ruling...” in 2007-CH-39738, we see a familiar name: “**Linda Green,**” the **infamous robo-signer.** However, what is really troubling is that **Joseph Younes' name was named in the document: Google-search 'Linda Green' and 'robo-signing,' if you didn't get the note on this nationwide fraud.** Or, review the filings of Atty. Andjelko Galic and prospective *Amicus Curiae*, Gordon Wayne Watts, on this point. (See below for this documentation.)

(#5) I filed a **criminal report** with the **Chicago Police Department** against **Mr. Younes for the forgery** of my signature – and related Mortgage Fraud theft of my house and land – right after I discovered my signature was forged. – I hope to obtain a copy of said criminal police report as soon as my attorney can find time to make a request of the police department. The department, however, has (thus far) refused to release a copy of my own police report to me—even though it should be available, even to local news media, under Public Records Laws. For the record, I intend to file a complaint with the **FOIA (Freedom of Information Act) Department of the ILLINOIS Attorney General's Office**, and against the Chicago Police Department for failure to investigate my complaint – and for subsequent illegal refusal to release my own records to me, myself. *(This report is not included in my statement here—it's missing.)*

(#6) There is a pending and open investigation **against Atty. Joseph Younes for forgery, Mortgage Fraud**, and the related “Mortgage Rescue Scam,” with the **OAG (Illinois Office of Attorney General, Lisa Madigan)**, in file number “00026542,” which is confidential, **but available via release under search warrant, court order, subpoena, etc.** – Additionally, both myself and a friend, Gordon Wayne Watts, who has helped me research some of these mortgage records, can verify the authenticity of this open and active investigation by the OAG. *(See attached cover letter from Mr. Watts to the OAG.)*

(#7) There is a pending and open investigation **against Atty. Joseph Younes for forgery, Mortgage Fraud**, and the related “Mortgage Rescue Scam,” with the **IDFPR (Illinois Department of Financial and Professional Regulation)**, in case number: “RE: PAUL L SHELTON; JOSEPH YOUNES Case 2015-07941.” *(See attached documentation, from the IDFPR, below.)*

(#8) There is a pending and open investigation **against Atty. Joseph Younes for forgery, Mortgage Fraud**, and the related “Mortgage Rescue Scam,” with the **IARDC (Illinois Attorney Registration & Disciplinary Commission)**, in Commission No. “Re: Joseph Younes, in relation to Gordon Wayne Watts, case #: 2015-IN-03387.” *(See attached documentation, from the IARDC, below.)*

(#9) Mr. Younes attempted to perform illegal construction and/or demolition on my property, and the CITY OF CHICAGO Code Enforcement immediately issued a 'Stop Work Order,' which, as of the date of this statement, is still in effect. *(See below for photos, to document this.)*

(#10) Assistant State Attorney, Thomas Simpson, of the **Cook County, IL SAO (State's Attorney Office)**, has confirmed that he is familiar with the criminal exploits of Mr. Shelton, and is in direct communication with all the principals in question. **The IL SAO Financial Crimes Unit**, including but not limited to Assistant State's Attorney, David Williams, may also confirm this. *(See attached cover letter from Mr. Watts to the SAO.)*

(#11) I have already been awarded a huge settlement from Stewart Title for fraud, but I am not legally able to disclose the amount of the confidential settlement, according to my attorney. I mention this because there was much more fraud by conspirators, which, as yet, is still under investigation by the courts and multiple regulatory agencies. *(Not documented, below, but available with subpoena, etc.)*

(#12) Numerous additional frauds were committed, and are currently being investigated by *The Register*, in, among other news items, the Tue. 01 Dec. 2015 news item with regard to the related ongoing **Mortgage Fraud**. Additional documentation, verifying forgery, duplicate signatures, documents notarized after-the-fact, and other frauds, is posted at *The Register's* open-source docket, and downloadable at the December 01, 2015 news item, at the principle websites: <http://GordonWatts.com> and <http://GordonWayneWatts.com> – The editor-in-chief (and legal reporter for this news item) is Mr. Gordon W. Watts.

(#13) As a result of the fraud that was committed, I have been unable to find renters, and have lots of potential income. Moreover, besides the fraud committed to take my my house & land, a hundreds of thousands of dollars of equity is missing – and unaccounted for – and I received no payment for house, land, or my stolen (missing) equity. – Since my house was taken from me – without my having been paid – the “burden of proof” is upon those who conspired to seal my house, to prove that they have not committed felony forgery, and criminal fraud to steal my house in a “Mortgage Rescue Scam,” **and, as a result, multiple open investigations are being conducted, as a result of the newly-uncovered documentation of multiple frauds.**

FURTHER AFFIANT SAYETH NAUGHT.

Richard B. Daniggelis, Affiant

**STATE OF ILLINOIS
COUNTY OF COOK**

The foregoing instrument was acknowledged, subscribed, and sworn before me this _____ day of _____, **2016**, by RICHARD B. DANIGGELIS, Affiant, who (is / is not) personally known to me, who (did / did not) produce identification as shown below, *and* who (did / did not) take an oath.

IDENTIFICATION TYPE: _____

IDENTIFICATION NUMBER: _____

Notary Public: _____ Date: _____

(Notary Stamp)

My Commission Expires: _____

April 20th 2007

I AM GIVING NOTICE OF THIS
SWORN STATEMENT

THAT DOCUMENT NUMBER 0622826137
IS A FORGERY

THAT THE AUTHENTIC DEED
IS IN MY NAME, RICHARD DANIGGELS
AND THAT I AM NOW LIVING IN THIS HOUSE
AT 1720 N. SEDGWICK ST. IN CHICAGO, ILL
THAT MY GRANDFATHER BOUGHT IN 1911

THE PROPERTY TAX INDEX NUMBER IS
14 33 324 044 0000

UNOFFICIAL COPY

Richard B. Daniggels
Subscribed and sworn to before me on
this 20th day of April 2007
at Chicago, County of Cook, State of Illinois.
Notary Public
Felicia Shelton

Richard Daniggels

OFFICIAL SEAL
FELICIA SHELTON
Notary Public, State of Illinois
My Commission Expires Nov 6, 2007

Doc# 071108132 Fee# \$48.00
Eugene - State Notary of Cook
Cook County 03/28 PM Pg. 1 of 1
Doc# 0622826137

THE EAST 66 FEET OF LOT 8 IN C. J. HULLS
SUBDIVISION OF BLOCK 51 IN CANAL TRUSTEE'S
SUBDIVISION OF SECTION 33, TOWNSHIP 40 NORTH,
RANGE 14, EAST OF THE THIRD PRINCIPAL
MERIDIAN, IN COOK COUNTY, ILLINOIS. SN

April 20th 2007

I AM GIVING NOTICE OF THIS SWORN STATEMENT

THAT DOCUMENT NUMBER 0622826137 IS A FORGERY

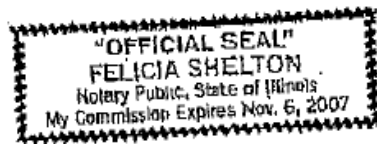
THAT THE AUTHENTIC DEED IS IN MY NAME, RICHARD DANIGGELS AND THAT I AM NOW LIVING IN THIS HOUSE AT 1720 N. SEDGWICK ST. IN CHICAGO, ILL THAT MY GRANDFATHER BOUGHT IN 1911

THE PROPERTY TAX INDEX NUMBER IS 14 33 324 044 0000

Richard Daniggels

Richard B. Daniggels
Subscribed and sworn to before me on 20th day of April 2007

Felicia Shelton
Notary Public
at Chicago, County of Cook, State of Illinois.



Doc#: 071099152 Fee: \$48.00
Eugene "Gene" Moore RHAP Fee: \$10.00
Cook County Recorder of Deeds
Date: 04/20/2007 03:08 PM Pg: 1 of 1



THE EAST 66 FEET OF LOT 8 IN C. J. HULL'S SUBDIVISION OF BLOCK 51 IN CANAL TRUSTEE'S SUBDIVISION OF SECTION 33, TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

EXHIBIT
F

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT, FIRST DISTRICT



JOSEPH YOUNES,)	
)	
Plaintiff,)	
)	
v.)	14 M1 701473
)	
RICHARD DANIGGELIS,)	
)	
Defendant.)	

AFFIDAVIT OF RICHARD DANIGGELIS SUBMITTED IN OPPOSITION
TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

I, Richard Daniggelis, under oath state as follows:

1. I am the Defendant in the above captioned case.
2. I have been residing at 1720 N. Sedgwick in Chicago, Illinois since 1989.
3. On or about July 9, 2006 I did not sign the warranty deed a copy of which has been submitted in support of Plaintiff's motion for summary judgment and marked as Exhibit 1.
4. I did not endorse and deliver the July 9, 2006 warranty deed to the Plaintiff.
5. I never appeared before Lisa C. Vitek and, contrary to what is indicated on the second page of the July 9, 2006 deed, I did not sign any documents in front of Lisa C. Vitek, the notary public.
6. Lisa C. Vitek is the wife of attorney Paul Shelton and Paul Shelton was the attorney for Joseph Younes. My house was "sold" to Joseph Younes without my knowledge and without my consent.
7. I executed a warranty deed in May of 2006 and gave it to Paul Shelton to hold it in escrow because Paul Shelton told me that he needed a warranty deed to help me save my house.
8. Joseph Younes did not pay any consideration for the warranty deed.
9. In the same transaction Paul Shelton was acting as the mortgage broker, as title agent and he was negotiating with one of my lenders on my behalf.
10. Paul Shelton is also a former partner of Joseph Younes.
11. Plaintiff's claim for possession is based on a contract, a copy of which was attached to Plaintiff's complaint as Exhibit "A". Plaintiff's Exhibit "A" is not legible and it is also an altered document.
12. Plaintiff's Exhibit "C" that was attached to Plaintiff's complaint is another fabrication.
13. Plaintiff's Complaint Exhibit "C" predates the alleged May 19, 2006 contract and therefore paragraph 7 of Plaintiff's complaint is also false.
14. I entered into an agreement with Plaintiff's attorney, Paul Shelton, that my contract with Joseph Younes would be null and void if the closing does not take place by May 19, 2006. See attached Exhibit ~~2~~ a copy of my agreement with Plaintiff's attorney.

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10/29/2014 10:04 PM
2014-M1-701473
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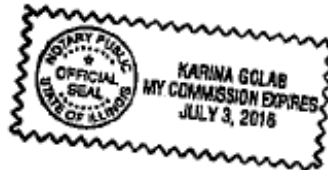
Affiant states nothing further.

Richard Daniggelis
Richard Daniggelis

Subscribed and Sworn to Before me
on this 29th day of, October, 2014.

Laura Gold

Notary Public



STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF BANKING

IN THE MATTERS OF:

TRUST ONE MORTGAGE CORPORATION
& PAUL SHELTON

)
)
)
)

No. 2009-MBR-128-b
No. 2009-LO-26-b

CONSENT ORDER

The Department of Financial and Professional Regulation, Division of Banking, of the State of Illinois (the "Department") and Trust One Mortgage Corporation ("TOMC") and Paul Shelton ("Shelton") in his capacity as TOMC's owner and individually as a loan originator, hereby enter into this Consent Order (the "Consent Order") and stipulate and agree to the following:

STIPULATIONS

The Department, and TOMC and Shelton stipulate that the Department issued orders No. 2009-MBR-128 and 2009-LO-26 (the "Orders") and that TOMC and Shelton timely filed requests with the Department for administrative hearing of the Orders. While administrative proceedings were commenced and prior to their conclusion, the Department and TOMC and Shelton entered into negotiations relating to matters of the Orders, and resulting in this Consent Order.

TERMS AND CONDITIONS

WHEREFORE, the Department and TOMC and Shelton agree as follows:

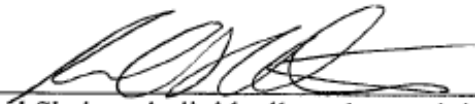
- I. The Department hereby removes the fine in Order No. 2009-MBR-128 against TOMC in the amount of \$20,000 and removes any claim the Department has for said fine to be paid through TOMC's surety bond. The Department removes said fine, and any claim thereto, in consideration of TOMC and Shelton signing the Settlement Agreement and Limited Mutual Release with Lessie M. Towns as verified by the Department of Financial and

Professional Regulation, Division of Professional Regulation. The Department further hereby removes the discipline of revocation in Order No. 2009-LO-26 and replaces said discipline with a lifetime ban, agreed to herein by Shelton. Shelton further agrees to never apply for an Illinois Mortgage Loan Originator License or equivalent credential with the Department. Shelton's status shall be shown in the Department's records and on the Department's website as "inactive-expired." If the Department subsequently finds Shelton originating loans of Illinois residential properties or undertaking any mortgage loan originator activities subject to the Act, then the Department will refer Shelton for discipline to the Illinois Attorney General's Office and/or any other appropriate authorities.


- II. TOMC and Shelton hereby withdraw their requests for administrative hearing of the Orders, and apart from Item I. above, the Orders stand as issued and Illinois residential mortgage license number MB.6759722 is revoked. The Department will post this Consent Order on the Department's website on the discipline page next to the Orders for purposes of public notice of the final disposition of the Orders.
- III. TOMC and Shelton agree to not file any petition for hearing and administrative review, or judicial review, of this Consent Order. TOMC and Shelton acknowledge that they have been represented by legal counsel in administrative proceedings before and negotiations with the Department, and that they willingly enter into this Consent Order after full review, evaluation, and consideration and with full knowledge of their rights under the Act, and Illinois Administrative Procedure Act.
- IV. The Department enters into the Consent Order for the purpose of imposing measures that are fair and equitable in the circumstances and that are consistent with the best interests of the people of the State of Illinois.

V. The Consent Order shall become effective upon all the parties hereinafter designated signing and dating the Consent Order and on the date that the last of those designated for the Department sign and date the Consent Order.

The foregoing Consent Order is approved in full.


Date: 11-15-10
Paul Shelton, individually as loan originator and as owner of
Trust One Mortgage Corporation

ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
BRENT E. ADAMS, SECRETARY
DIVISION OF BANKING


Date: 11/17/10
JORGE A. SOLIS, DIRECTOR

Filed September 14, 2015

In re Paul Leslie Shelton

Respondent-Appellant

Commission No. 2013PR00039

**Synopsis of Review Board Report and Recommendation
(September 2015)**

The Administrator's eight-count Complaint charged Respondent with engaging in misconduct from 2006 to 2012, including engaging in a conflict of interest when he entered into business transactions with his client without adequate disclosures, engaging in a criminal act by fraudulently notarizing a release of mortgage, making false statements to a tribunal, engaging in a conflict of interest in a real estate transaction by acting as both a broker and attorney, engaging in the unauthorized practice of law after failing to register, neglecting a number of foreclosure matters, failing to return unearned fees to clients, and failing to respond to the Administrator's requests for information.

The Hearing Board found the Administrator proved by clear and convincing evidence that Respondent engaged in most of the misconduct charged. Given the serious and extensive misconduct engaged in by Respondent, the considerable aggravating evidence, which included Respondent's prior discipline, and the lack of mitigating evidence, the Hearing Board recommended Respondent be disbarred.

Upon review, Respondent argued that the Hearing Board Chair was biased against him and should have recused himself. He also contended that the Hearing Board erred in deeming certain allegations admitted and rejecting his alleged affirmative defenses. He disputed various findings of the Hearing Board and contended that the recommendation of disbarment was excessive. The Review Board considered Respondent's arguments and concluded that the Hearing Board's pre-hearing orders were within the Board's discretion. The Review Board found the Hearing Board's findings of misconduct were supported by the evidence. The Review Board affirmed the Hearing Board's findings of fact and the findings of misconduct. In light of the repeated and serious misconduct and the factors in aggravation, the Review Board agreed with the Hearing Board's recommendation of disbarment.

**BEFORE THE REVIEW BOARD
OF THE
ILLINOIS ATTORNEY REGISTRATION
AND
DISCIPLINARY COMMISSION**

<p>In the Matter of:</p> <p>PAUL LESLIE SHELTON,</p> <p>Respondent-Appellant,</p> <p>No. 6191197.</p>	<p>Commission No. 2013PR00039</p>
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**REPORT AND RECOMMENDATION OF THE REVIEW BOARD
SUMMARY**

This matter arises out of the Administrator's eight count complaint charging Respondent with engaging in misconduct from 2006 through 2012, including but not limited to entering into a business transaction with a client without making the adequate disclosures, fraudulently notarizing a release of mortgage, making a false statement to a tribunal, engaging in numerous conflict of interests in real estate transactions, engaging in the unauthorized practice of law after failing to register, neglecting foreclosure matters and failing to return the clients' unearned fees and/or costs, and failing to cooperate with the ARDC and respond to requests for information. The Hearing Board found that Respondent engaged in most, but not all, of the misconduct charged in the Complaint. The Hearing Board found little mitigation and that Respondent's misconduct was aggravated by his lack of remorse, the harm

caused to his clients and his prior discipline, a reprimand for similar misconduct in 2011. The Hearing Board recommended that Respondent be disbarred.

Upon review, Respondent contends that the Hearing Board violated his due process rights. He argues that the Hearing Board Chair was biased and should have recused

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himself from this matter. He contends that the Hearing Board improperly deemed certain allegations admitted and improperly sanctioned him for failure to comply with the Rule requiring the disclosure of witnesses. He also disputes some of the Hearing Board's findings of misconduct and argues that disbarment is unwarranted. For the following reasons, we are not swayed by Respondent's arguments and we affirm the Hearing Board's findings of misconduct. Like the Hearing Board, we recommend that Respondent be disbarred.

THE HEARING BOARD'S PRE-HEARING ORDERS

Respondent argues that his due process rights were violated because the Hearing Board Chair entered orders striking Respondent's affirmative defenses, deeming certain allegations of the Complaint admitted, and barring Respondent from calling certain witnesses. We have considered Respondent's arguments and have reviewed the record in this matter. We have concluded that the Chair did not abuse his discretion.

The Chair's orders were within the sound discretion of the Hearing Board and should not be disturbed by this Board on review absent an abuse of discretion. *In re Golden*, 09 CH 88, (Review Bd., July 23, 2012), *Respondent's petition for leave to file exceptions denied*, No. M.R. 25509 (Nov. 19, 2012); *In re Petrulis*, 96 CH 546 (Review Bd., Dec. 9., 1999), *approved and confirmed*, No. M.R. 16556 (June 30, 2000). An abuse of discretion occurs only when no reasonable person would take the position adopted by the Hearing Board. *In re Auler*, 02 SH 102 (Review Bd., March 21, 2005) at 11, *recommendation adopted*, No. M.R. 20207 (Sept. 26, 2005). *See also, In re Williams*, 2011PR00107 (Review Bd., Sept. 30, 2013), *approved and confirmed*, No. M.R. 26430 (Jan. 17, 2014)(this Board found Hearing Board did not abuse its discretion by similarly sanctioning the attorney for failing to file an answer that complied with the rules despite the attorney's claims of racial prejudice).

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Respondent filed an Answer to the Administrator's Complaint on June 27, 2013. Although he admitted or denied some of the allegations, in other instances he failed to specifically admit or deny the allegation in violation of Commission Rules 233. He also filed numerous "Affirmative Defenses" that were not appropriate affirmative defenses. On July 19, the Chair directed Respondent to re-answer the allegations that the Administrator asked be deemed admitted. Respondent did not comply with the Chair's order. Instead, he filed an amended answer repeating many of his affirmative defenses and continuing to fail to comply with Rule 233. Accordingly, pursuant to Commission Rule 236, the Chair ordered that the portions of the answer that failed to comply with Rule 233 be deemed admitted. The Chair also ordered that the affirmative defenses be stricken and barred Respondent from presenting evidence of the affirmative defenses at hearing. In addition, Respondent failed to comply with Commission 253 and list any witnesses he planned to call at hearing. Accordingly, on November 15, 2013, the Chair entered an order barring Respondent from calling any witnesses other than the witnesses named in the Administrator's 253 Report. Given Respondent's failure to comply with the Rules, the Chair's orders were well within his discretion.

Due process principles do not support Respondent's claims. Due process requires that the respondent be given notice of the charges and a meaningful opportunity to respond to the charges. *In re Chandler*, 161 Ill.2d 459, 641 N.E.2d 473 (1994); *In re Cooley*, 91 CH 426 (Review Bd., Sept. 15, 1993), *approved and confirmed*, No. M.R. 9484, 9522 (Jan. 25, 1994). Respondent was given a meaningful opportunity to respond to the charges; his failure to follow the Rules does not create a denial of due process.

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THE CHAIR'S REFUSAL TO RECUSE HIMSELF

Prior to the hearing in this matter, Respondent moved that the Chair of the Hearing Panel "consider whether recusal was warranted" because the Chair had attended ABA seminars that the prior Counsel for the Administrator in this matter also attended. Respondent specifically stated that he was not requesting the removal or recusal of the Chair.

Respondent now argues that the Chair should have recused himself. We disagree. Respondent has waived this issue in light of his express refusal to request the substitution of the Chair. *See, e.g., In re Jennings*, 99 SH 32 (Review Bd., Dec. 27, 2000) at 11, *Respondent's petition for leave to file exceptions denied*, No. M.R. 17394 (May 25, 2001) (Review Board rejected argument that the Hearing Board improperly considered uncharged misconduct where the respondent had failed to object to the underlying evidence at hearing). Moreover, Respondent provides no support for the notion that a judge, or the Chair in a disciplinary proceeding, would be disqualified from hearing a matter because he or she attended the same bar association seminars as counsel in the matter.

RESPONDENT'S MISCONDUCT

We turn now to Respondent's conduct that led to the filing of the charges before us. As set out more fully in the Hearing Board's 84 page report, the Hearing Board found that Respondent, a solo practitioner who has concentrated his practice in real estate foreclosure matters since approximately 2008, engaged in the misconduct in his representation of clients in multiple matters.

Count I

Conflict of Interest and Fraudulent Notarization of Release of Mortgage re: John LaRocque

In 2004 Respondent entered into business transactions with John LaRocque to purchase properties owned by the United States Department of Housing and Urban Development

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("HUD") and then sell the properties for a profit. Respondent found the properties and did the legal work for the transactions and LaRocque provided most of the funding. Originally, Respondent and LaRocque formed a company, called JP Foundation, LLC, through which they purchased and sold the properties. In 2006, Respondent and LaRocque decided to invest in 11 additional properties, rehab them and then sell them. Again, Respondent handled all the paperwork and legal documents for the purchases and sales. LaRocque provided the loans to Respondent to purchase the properties. LaRocque did not want to retain an ownership interest in the properties but instead wanted to receive mortgages to secure his interest. LaRocque believed that Respondent was acting as his attorney with respect to these investments and believed Respondent would protect his interests. Respondent did not advise LaRocque to seek independent legal counsel.

One of the properties involved in this arrangement was located at 2720 West Warren Blvd. in Chicago ("Warren property"). On March 5, 2006, LaRocque loaned Respondent \$385,000 to purchase the Warren property. Title to the Warren property remained in the name of Henry Tate, the then owner of the property. Respondent prepared mortgage documents and LaRocque received a mortgage on the property on March 25, 2006, with Tate as mortgagor. Respondent handled the closing on the property. Again, he did not tell LaRocque to seek independent counsel or advise him there was a conflict of interest. In April 2007, Respondent prepared a release of LaRocque's mortgage on the Warren property without telling LaRocque. Respondent testified he sought the release so that the Warren property could be refinanced and could then be rehabbed. The release purported to be signed by LaRocque and was notarized by Respondent.

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LaRocque testified he did not sign the release or give anyone permission to sign it. After LaRocque learned about the release, he confronted Respondent. Respondent then drafted and provided LaRocque with a demand note, according to which Respondent was personally liable to LaRocque for \$265,000. The note was secured by a second mortgage on Respondent's personal residence. Once again, Respondent did not advise LaRocque to seek independent counsel, advise him of the conflict of interest, or disclose in any detail his finances and ability to pay on the note.

Respondent made some payments on the note to LaRocque totaling \$31,791.08. As of the hearing date, LaRocque was still trying to collect the remaining amount due on the note.

The Hearing Board concluded that Respondent violated the following Rules:

- a. Rule 1.7(b)(1990) (representation of a client when the representation may be materially limited by the lawyer's own interests) by engaging in a conflict of interest, without consent, with respect to the 11 additional properties and with respect to the execution of the demand

note and second mortgage;

- b. Rule 1.8(a)(1)(1990)(entering into a business transaction with a client where the client and lawyer may have conflicting interests without consent after disclosure) by investing in the underdeveloped properties with LaRocque, obtaining a loan from LaRocque for the Warren property, and by negotiating the note and second mortgage, all without the proper disclosures or consent from LaRocque;
- c. Rule 1.8(a)(2)(1990)(entering into a business transaction with a client where the client expects the lawyer to exercise his professional judgment for the protection of the client, without consent after disclosure) by investing in the underdeveloped properties, obtaining the loan and negotiating the note and second mortgage without making the proper disclosures;
- d. Rule 8.4(a)(3)(committing a criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects), by violating the Illinois Notary Act by not

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witnessing LaRocque's signature but notarizing the release of mortgage;

- e. Rule 8.4(a)(4)(conduct involving dishonesty, fraud, deceit or misrepresentation) by notarizing the release of mortgage when he knew LaRocque had not signed the release in his presence.

Before this Board, Respondent contends that he was acting as a business partner or investment partner with John LaRocque as opposed to acting as his lawyer. Consequently, Respondent argues that the Hearing Board's findings that he violated Rule 1.7 and 1.8 should be overturned.

We do not disturb the findings of fact made by the Hearing Board unless they are against the manifest weight of the evidence. *In re Cutright*, 233 Ill. 2d 474, 488, 910 N.E. 2d 931 (2009). "A decision is against the manifest weight of the evidence only if the opposite conclusion is clearly evident." *Id.* This deferential standard of review recognizes that the Hearing Board is in a better position to observe the demeanor of witnesses, judge credibility, and resolve conflicting evidence. *Id.*

LaRocque testified that he believed that Respondent was acting as his counsel in the transactions. Respondent admitted in his Answer to the Administrator's Complaint that LaRocque believed that Respondent was acting as his attorney and was protecting his interests. LaRocque's belief was reasonable. Respondent admittedly handled all of the legal work pertaining to the transactions. Accordingly, the Hearing Board's finding that Respondent was acting as LaRocque's attorney in the transactions was not against the manifest weight of the evidence. Given the conflict of interest, Respondent was obligated under Rule 1.7 to obtain his client's consent after disclosure and was obligated under Rule 1.8(a) to advise LaRocque to obtain independent counsel. *See e.g., In re Sax*, 03 CH 99 (Review Bd., Nov. 27, 2007), *Respondent's petition for leave to file exceptions denied*, No. M.R. 22139 (March 17, 2008).

PAGE 8:

There is no evidence in the record that Respondent told LaRocque to obtain other counsel or that he disclosed the conflict and obtained consent. We therefore see no reason to disturb the Hearing Board's findings.

In addition, Respondent contends that he was improperly found to have "forged" LaRocque's signature on the release of the mortgage. Respondent is mistaken. He was only charged with engaging in criminal conduct by violating the Illinois Notary Act. The evidence supports that finding. LaRocque testified he did not sign the release; the Hearing Panel believed him and his testimony was corroborated by the testimony of his brother. Accordingly, Respondent could not have witnessed LaRocque's signature, and Respondent therefore violated the Illinois Notary Act. *See, e.g., In re Forrest*, 2011PR00011 (Review Bd., Aug. 22, 2013), *approved and confirmed*, No. M.R. 26358 (Jan. 17, 2014)(this Board concluded that the respondent violated Rule 8.4(a)(3) by improperly notarizing a quit claim deed).

Count II
Lying to the Court in the LaRocque Collection Matter

When Respondent stopped paying on the note he executed as set forth in Count I above, LaRocque hired an attorney, Carl Poli, to attempt to collect the outstanding sums from Respondent. In December 2010, Wells Fargo Bank, the holder of the first mortgage on Respondent's personal residence, filed a foreclosure action against Respondent. LaRocque was named as a defendant because he held the second mortgage. Poli filed an appearance on behalf of LaRocque.

In July 2012, Respondent still had not repaid the note and Poli filed a motion for summary judgment to attempt to collect the amount owing to LaRocque. The motion was partially granted in the amount of \$327,972.94, the amount due on the note with interest and penalties. The court set a date for a hearing to set attorney's fees for October 18, 2012.

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Respondent filed a motion to reconsider the summary judgment ruling but failed to provide notice of the motion to Poli. At the disciplinary hearing, Poli testified that Respondent often failed to serve him with documents. Respondent then filed a motion to extend time and again failed to give notice to Poli. He set the motion for a hearing on October 17, 2012 and Poli did not appear because he did not know about the hearing. When Respondent appeared in court on the motion, Respondent falsely told the court he had served Poli with the motions. When Respondent drafted the order, he removed the October 18 hearing on attorney's fees from the call. When Poli appeared in court the next day for the hearing, he told the court that he had not been served with Respondent's motions. The court reinstated the court date and entered judgment for attorney's fees for \$25,325.

As a result of his lies to the court about service of the above motions, the Hearing Board concluded that Respondent knowingly made a false statement to a tribunal in violation of Rule 3.3(a)(1)(2010), engaged in dishonest conduct in violation of Rule 8.4(c), and engaged in conduct prejudicial to the administration of justice in violation of 8.4(d). These findings are supported by the evidence.

Count III
Conflict of Interest by Acting as a Real Estate Broker and an Attorney in the Same Transaction and Dishonest Conduct re: Peter Blythe

The Hearing Board found, by considering the testimony and by reviewing the documentary evidence, that Respondent represented, as an attorney, Peter Blythe ("Blythe") in the purchase and sale of at least four properties between September 2005 and April 2006. The settlement statements reflect Respondent's name as attorney for Blythe and reflect that he collected document preparation fees and other unspecified fees.

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In addition, Respondent had additional various personal financial interests in these four transactions ("the Blythe transactions"). For instance, he acted as title agent and attorney for the title company, Stewart Title, and issued title policies, for at least \$8,000 in fees, in three of the four transactions. He also acted as a real estate broker through his real estate brokerage firm, Shelton & Associates, and received thousands of dollars in brokerage commissions in these transactions although at the time of two of the transactions, he had not yet incorporated the brokerage firm or received a real estate brokerage license.¹

The Illinois Department of Financial and Professional Regulation ("IDFPR") initiated an investigation of Respondent that included an investigation of the Blythe transactions. With respect to these four transactions, the Illinois Real Estate Act provided that a real estate broker could be subject to discipline and fines for acting as a broker or salesperson in the same transaction in which the broker acts as attorney for either the buyer or seller. The attorney for the IDFPR, Craig Capilla, testified that there was no evidence that Respondent had made any disclosures to Blythe about the conflicts of interest in his various roles in these transactions. The IDFPR filed a complaint against Respondent alleging that he violated this provision of the Act with respect to these transactions. When Respondent did not respond to the allegations, a default order was entered. On September 27, 2011, the IDFPR indefinitely suspended Respondent's license as a real estate broker and fined him \$25,000.

As a result of Respondent's dual roles, the Hearing Board concluded that in three of the four transactions,

Respondent acted as an attorney for Blythe while also acting as a title agent and/or real estate broker. Consequently, Respondent violated Rule 1.7(b)(1990) by representing a client when the representation was materially limited by the lawyer's own interests. In addition, the Hearing Board concluded that Respondent engaged in dishonest

PAGE 11:

conduct in violation of Rule 8.4(a)(4)(1990) by receiving brokerage commissions in two of the transactions before he had received his real estate brokerage license.

While Respondent contends that he violated no Rules by acting as a broker and an attorney in the same transactions, the Court has previously disciplined attorneys for accepting similar dual roles. In *In re Kaeding*, 03 CH 30, *petition for discipline on consent allowed*, No. M.R. 19208 (March 12, 2004), the Court imposed a ninety day suspension for a conflict of interest in a real estate transaction where the lawyer represented a party to the transaction and was also the real estate broker. In *In re Berry*, 05 CH 126, *petition for discipline on consent allowed*, No. M.R. 21073 (Sept. 21, 2006), the attorney was disciplined for acting as the real estate agent, attorney and agent of the title company in the same transaction. Finally, in *In re Marshall*, 2010PR00129 (July 24, 2013), *Respondent's petition for leave to file exceptions denied*, No. M.R. 26312 (Jan. 27, 2014), the attorney was suspended for six months and until he refunded the commission fees to the client in part for engaging in a conflict of interest in violation of Rule 1.7(b) by acting as an attorney for the seller where his spouse was the real estate broker. We therefore affirm the Hearing Board's findings that Respondent violated Rules 1.7(b) and 8.4(a)(4).

Count IV

Failure to Respond to the ARDC Requests Regarding the Investigation of Respondent's Conduct in the Blythe Matter

The IDFPR reported Respondent's conduct in the Blythe transactions to the ARDC in late November 2011. The Administrator sent letters to Respondent asking him for information and documents. Respondent failed to answer the requests. In late January 2012, the Administrator issued a subpoena *duces tecum* commanding Respondent's appearance in the offices of the ARDC on February 29, 2012. Respondent failed to appear or produce the requested

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documents. At the time this matter was voted by an Inquiry Panel in April 2013, Respondent still had not complied with the Administrator's requests. As a result of Respondent's failure to comply with the requests for information, the Hearing Board concluded Respondent violated Rules 8.1(b) and 8.4(d). These findings are supported by the evidence.

Count V

Respondent's Unauthorized Practice of Law

In 2006, Respondent failed to register with the ARDC or pay the annual registration fee until April 18, 2006. Accordingly, pursuant to the Rule 756, on February 6, 2006 the Administrator removed Respondent's name from the Roll of Attorneys authorized to practice law in Illinois. From February 6 to April 17, Respondent represented Blythe in four real transactions as noted above. On February 10, 2006, he represented Janis Tassone in a real estate transaction and on March 26, 2006 he represented John LaRocque in a real estate transaction. Respondent admitted in his Answer to the Administrator's Complaint that he did not inform these clients of his removal from the Master Roll but stated he did not know he wasn't registered. The Hearing Board concluded that his misconduct was not excused by his ignorance and found that he violated Rule 5.5(a) by practicing law without a license. We see no reason to disturb the Hearing Board's findings.

Count VI

Respondent's Mishandling of Various Foreclosure Matters

The Administrator alleged misconduct with respect to Respondent's representation, between August 2009 and February 2012, of nine different homeowners in defending foreclosure actions filed against them and/or in seeking loan modifications for them. While each of the representations outlined in the allegations of this Count is unique, certain facts surrounding the representations are similar. Respondent met initially with the clients. He had the

PAGE 13:

clients sign an agreement that his law firm would "waive its customary \$4,000 upfront classic retainer." The agreement then stated that the client would then agree to pay a non-refundable monthly sum and that he would continue to work on the file. The fees were deducted from the clients' bank accounts automatically. There was no end date to the monthly payments. In addition, Respondent asked for and received money for costs of approximately \$300-\$500. Respondent deposited all fees and costs into his business account; he had no client trust account. He testified he paid any court costs out of his business account.

Throughout his representation in the nine matters, Respondent withdrew the monthly fees whether or not he performed any services. The total fees paid by the clients varied from a low of \$1,100 to a high of \$19,200. Respondent did not give any refunds of any unearned fees or costs.

The Hearing Board found that Respondent performed a limited amount of work and sometimes no work on behalf of the clients. We need not repeat the facts of each of the nine representations, as the Hearing Board thoroughly recited the evidence in its Report. We will use the matter of Respondent's representation of Nadine and Walter Grice as illustrative of Respondent's misconduct in the nine foreclosure matters. The Grices retained Respondent in February 2012 to defend a foreclosure action filed against them and to obtain a loan modification of their mortgage on their home. They initially paid Respondent \$900, which was to include \$300 for Respondent's costs, and signed a fee agreement to have \$600 a month debited from their bank account and sent to Respondent. Thereafter, Respondent never communicated with the Grices, although he received the \$600 a month in fees. The Grices were unable to determine if Respondent was doing any work. In December 2012, the Grices received a notice of sale for the home. On December 20, 2012, they sent a letter to Respondent terminating his services and

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advising Respondent that they had checked the records of their case and had learned that Respondent had never filed an appearance on their behalf. They requested a refund of \$4500 and a return of their documents; they never received a refund of their fees or costs.

While the other eight matters are not identical to the Grice matter, in each of the matters, the client expressed an inability to obtain information or services from Respondent and frustration at obtaining little, if any, relief despite paying Respondent hefty fees, particularly given their precarious financial situations. Most of the clients testified that they did not talk to Respondent after the initial meeting and that Respondent did not respond to their requests for information. Respondent did not provide any documents or billing statements to the clients documenting any work performed on behalf of the clients. In some of the cases, it appears Respondent appeared in foreclosure actions on behalf of the clients, but in some of the matters he failed to appear at scheduled court hearings or client meetings. Respondent's testimony as to his services was vague; he testified generally that he took steps to delay the foreclosure proceedings or stave off an eviction so his clients could stay in their homes, but provided few details about each client's matter.

The Hearing Board concluded that Respondent violated Rule 1.3 by failing to file appearances in two of the nine matters, including the Grice matter, and by missing court dates and client meetings in most of the other matters. The Hearing Board also found that Respondent violated Rule 1.4 by failing to adequately communicate with most of the clients outlined in this Count, failing to return the clients' phone calls, and by failing to update the clients as the status of their matters, including in a couple of matters where the clients' houses were put up for sale. While the evidence regarding some of the representations was vague and uncorroborated, the Hearing Board relied on the clients' testimony in reaching a conclusion that Respondent violated

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these Rules with respect to at least some of the clients. The Hearing Board was in the best position to assess the credibility of the witnesses, including Respondent, and we will not substitute our judgment for that of the Hearing Board. While Respondent disputes the findings that he failed to provide services to these nine clients, he points to no evidence in the record that the Hearing Board ignored. We find that their conclusions that Respondent violated Rules 1.3 and 1.4 were not against the manifest weight of the evidence.

The Hearing Board also found that Respondent violated Rule 1.5 by charging and collecting unreasonable fees. With respect to the violation of Rule 1.5, the Hearing Board found that Respondent charged an unreasonable fee because, without explanation to the clients, the monthly fee was taken whether or not Respondent performed any

services and because there was no end date to the fees. The Hearing Board's discussion in the Report concerning Respondent's violation of Rule 1.5 is unnecessarily convoluted, in our view. We agree with Respondent that he could have entered into agreements with his clients to receive a fee, payable in monthly installments. Such an agreement would not necessarily require that Respondent actually perform services each month. However, the problem with Respondent's fee agreement is that there was no end date to the fees. The clients had no way of determining the total fee they were paying Respondent.

More importantly, Respondent did little to no work to justify the fees he took. The Hearing Board found that the fees were unreasonable pursuant to Rule 1.5 in light of the minimal services provided by Respondent. The Hearing Board considered the factors set forth in Rule 1.5 and concluded, "[W]e are convinced the work performed by Respondent on behalf of his clients in no way justified the fees received." We give deference to this finding by The Hearing Board. While Respondent argues that other attorneys charge similar fees, he provided no evidence in

PAGE 16:

support of his claims, and his argument ignores the other factors considered by the Hearing Board in reaching a determination that Respondent violated the Rule. We conclude that the Hearing Board's finding that Respondent violated Rule 1.5 was not against the manifest weight of the evidence.

Finally, the Hearing Board concluded that Respondent violated Rules 1.15(a) and 1.15(c) by depositing the money received for costs and/or expenses in an account that was not a client fund account; violated Rule 1.16(a)(3) by failing to withdraw in two of the matters after being discharged; and violated Rule 1.16(d) by failing to return his unearned fees. The evidence supports these findings and we see no basis to disturb them.

Count VII

Failure to Respond to ARDC Requests in the Nunez and Malkinski Matters

In July 2012 and August 2012 the Administrator sent letters to Respondent requesting information relative to investigations into Respondent's representation of Hector Nunez and Lisa Malkinski, two of the clients named in Count VI of the Administrator's Complaint. Respondent responded on August 8, 2012. On October 22, the Administrator sent Respondent a subpoena *duces tecum* requesting production of Respondent's client files. Respondent received the letter but failed to produce any documents in response to the subpoena.

At hearing, Respondent claimed that in February 2013 the DuPage County States Attorney executed a search warrant on his office and took his computer and documents including part of the Nunez file. The Hearing Board noted that Respondent provided the sole evidence of the warrant or what may have been confiscated. Further, the Board found that any such warrant did not affect Respondent's ability to respond to the subpoena prior to February 2013. The Hearing Board concluded that Respondent violated Rule 8.1(b) by failing to respond to a lawful

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demand for information from a disciplinary authority. Again, we see no need to disturb this finding.

Count VIII

Failure to Respond to ARDC Request in the Paschal Matter

Respondent failed to produce documents relating to his representation of Demetrios and Lillian Paschal despite requests by the Administrator to do so. In February 2013, the Administrator issued a subpoena *duces tecum* requiring Respondent to appear and produce his file on February 27, 2013. Respondent sent a file to counsel for the Administrator on February 23, 2013, but he failed to appear for his sworn statement on February 27, 2013. He never attempted to reschedule an appearance. The Hearing Board concluded Respondent violated Rule 8.1 and we uphold this finding.

SANCTION RECOMMENDATION

In determining the appropriate sanction recommendation, we consider the nature of the misconduct charged and proved, and any aggravating and mitigating circumstances shown by the evidence. *In re Gorecki*, 208 Ill. 2d 350, 360-61, 802 N.E.2d 1194, 1200 (2003). In addition, this Board may consider whether the sanction will "help preserve public confidence in the legal profession." *In re Twohey*, 191 Ill. 2d 75, 85, 727 N.E.2d 1028, 1034 (2000).

Respondent's misconduct was egregious, spanned a number of years, and involved multiple clients. As found by the Hearing Board, Respondent took advantage of vulnerable clients and charged them unreasonable fees while they were in the process of losing their homes and then he neglected their matters and failed to represent many of them with the diligence we expect from members of the bar. He engaged in conflicts of interest with no true consideration of his obligations to his clients. He lied to a court. He engaged in dishonesty by notarizing a document without witnessing the signature. He repeatedly put his own interests

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ahead of his obligations to others. He repeatedly failed to follow the Rules of Professional Conduct, failed to cooperate with the ARDC, and failed to follow the rules in his own disciplinary proceeding.

The Hearing Board found that there were numerous factors that aggravated Respondent's very serious misconduct. Many of the clients testified that their dealings with Respondent burdened them financially, compounded the stress they were already facing, and negatively affected their view of attorneys. As of the date of the hearing, Respondent had not paid John LaRocque the remaining amount owing to him, he had not paid the \$25,000 fine imposed by the IDFPR, and he had not returned any of his unearned fees or costs to his clients. We are particularly troubled by Respondent's complete inability to acknowledge or appreciate the wrongfulness of his misdeeds.

The Hearing Board relied on a number of cases where the Court has imposed the sanction of a lengthy suspension or disbarment for misconduct that was extensive and serious. *See, e.g., In re Levin*, 101 Ill.2d 535, 463 N.E.2d 715 (1984)(suspension of three years and until further order of the Court for engaging in a pattern of neglect and misrepresentations to clients); *In re Tarsa*, 99 CH 23 (Hearing Bd., Jan. 12, 2000), *approved and confirmed*, No. M.R. 16654 (May 17, 2000)(disbarment for conduct that included conflicts of interest, conversions, dishonesty and neglect).

We give deference to the Hearing Board's reasoned analysis of the proper sanction recommendation to impose in light of the purposes of discipline. Given the extensive serious misconduct and the factors in aggravation, we agree with the Hearing Board's recommendation.

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We affirm the findings of fact and the findings of misconduct of the Hearing Board. We recommend to the Court that Paul Leslie Shelton be disbarred.

	Respectfully Submitted, Johnny A. Fairman, II Richard A. Green Keith E. Roberts, Jr.
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CERTIFICATION

I, Kenneth G. Jablonski, Clerk of the Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois and keeper of the records, hereby certifies that the foregoing is a true copy of the Report and Recommendation of the Review Board, approved by each Panel member, entered in the above entitled cause of record filed in my office on September 14, 2015.

	Kenneth G. Jablonski, Clerk of the Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois
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¹ He also acted as mortgage broker, through his company Trust One, and received over \$24,000 in commissions but the Hearing Board did not find a conflict of interest with this interest because of the limited evidence presented by the Administrator.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

6
4C

GMAC

vs.
YOUNG et al

No. 07 CH 29738

CASE MANAGEMENT ORDER

Counsel

This case is before the court for ___ initial subsequent status, or motion, counsel for plaintiff, ___ defendant, ___ third party defendant. present, it is hereby ordered:

- 4296 1. Non-opinion written discovery to be completed by _____
- 4218 2. Non-opinion oral discovery to be completed by _____
- 4296 3. _____ shall complete outstanding written discovery by _____
- 4218 4. _____ shall be presented for deposition by _____
- 4253 5. Plaintiff shall serve Rule 213 f (2) and (3) disclosures by _____
- 4253 6. Defendant shall serve Rule 213 f (2) and (3) disclosures by _____
- 4218 7. Plaintiff's 213 f (2) and (3) witnesses to be deposed by _____
- 4218 8. Defendant's 213 f (2) and (3) witnesses to be deposed by _____
- 4295 9. All discovery to be completed by _____
- 4231 10. All dispositive motions shall be filed and noticed no later than _____
- 4619 11. This matter is continued to 2-22-16 at 9:10 AM for: _____

(check one or more)

- Service Status
- Compliance Status
- Default / Prove Up
- Pretrial (parties must be present unless excused by order of Court)
- Other Deposition status
- Pleadings Status
- Settlement Status
- Final Pretrial
- Written Discovery Status
- Oral Discovery Status
- Expert Discovery Status

4288

4482 12. Jury/Bench trial is set to begin on _____ at 10:30 a.m. by 1/4/16

(1) It is further ordered: Richard Daniegels is granted 14 days to issue subpoenas for depositions of Karen Skaner, Lisa Vittek and John LaRochette.

(2) These depositions to be completed by 4/21/16 by February 5, 2016

4218

Atty No. 33013
Atty Name: AMJERICO GMAC
Attorney for: RICHARD DANIEGELS
Address: 134 N La Salle St, # 400
City: CHICAGO, IL 60602
Phone: 312 986-1510

Enter:

ENTERED
JUDGE SANJAY TAILOR
DEC 21 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
DEPUTY CLERK

[Signature]

Exhibit "B"

Record and Return To:
Pierce and Associates
1 N. Dearborn ST. Fl.13
Chicago, IL 60602-4321
PB# 0715886

Please Return To: DOCX
1111 Alderman Dr.
Suite 350
Alpharetta, GA 30005

Please cross-reference to
Mtg/DOT Recorded in
Book N/A, Page N/A,
Instr# 622826137
Adams County, IL.

Project: A063
Loan Number: 000-58942520
Re: 1720 N. Sedgwick St Chicago, IL 60614

LOST ASSIGNMENT AFFIDAVIT

STATE OF GA
COUNTY OF Fulton

Linda Green, Being Vice President On behalf of Saxon Mortgage Servicing, Inc being duly sworn, deposes and says that to his/her best knowledge and belief under the penalty of perjury:

1. I am the Vice President for Saxon Mortgage Servicing, Inc the duly appointed and acting serving entity on behalf of LaSalle Bank National Association, as Trustee for Morgan Stanley Mortgage Loan Trust 2006-16AX, the current holder of a certain note dated 7/28/2006, made by Joseph Younes to the order of GMAC Mortgage LLC, in the principal sum of \$583100, together with interest at the rate of 8.75 percent (8.75%) per annum (hereinafter referred to as the "Note"). A copy of the Note is attached hereto as "Exhibit A".
2. The Note was secured by a Mortgage/Deed of Trust of same date made by Joseph Younes to GMAC Mortgage LLC, which Security Deed was recorded on 9/16/2006, in Book N/A, Page N/A, Instrument #622826137 in the office of recorder of Adams County, IL.
3. LaSalle Bank National Association, as Trustee for Morgan Stanley Mortgage Loan Trust 2006-16AX is now the current and has been the holder of the Note and LaSalle Bank National Association, as Trustee for Morgan Stanley Mortgage Loan Trust 2006-16AX has been in physical possession of all associated loan records since the loan was transferred.
4. Based upon the information available to us, it appears the assignment of the Mortgage/Deed of Trust from GMAC MORTGAGE, LLC to LaSalle Bank National Association, as Trustee for Morgan Stanley Mortgage Loan Trust 2006-16AX was lost prior to recording when the loan was transferred

MMS

000159

from GMAC MORTGAGE, LLC to LaSalle Bank National Association, as Trustee for Morgan Stanley Mortgage Loan Trust 2006-16AX and it is not obtainable. LaSalle Bank National Association, as Trustee for Morgan Stanley Mortgage Loan Trust 2006-16AX is the assignee, holder and owner of the loan.

5.

Sworn to and subscribed before me this
____ day of _____, 20____.

Notary Public:

Deponent:



Name: Linda Green

MMS

000160



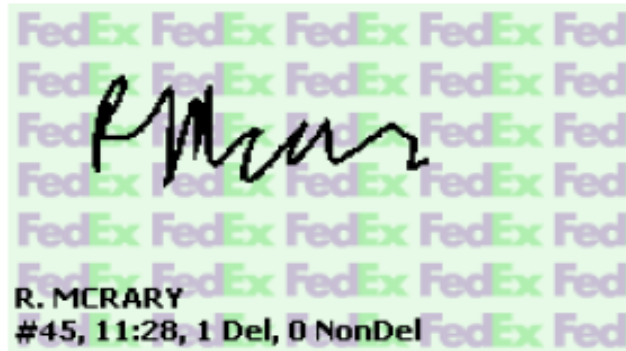
August 31, 2015

Dear Customer:

The following is the proof-of-delivery for tracking number **781090046492**.

Delivery Information:

Status:	Delivered	Delivery location:	500 S 2ND ST Springfield, IL 62701
Signed for by:	RMCRARY	Delivery date:	Aug 7, 2015 11:30
Service type:	FedEx Ground		
Special Handling:			



Shipping Information:

Tracking number:	781090046492	Ship date:	Aug 4, 2015
		Weight:	0.8 lbs/0.4 kg

Recipient:
Office of the Illinois Attorney Gen
Consumer Protection Bureau
500 South Second Street
Springfield, IL 62706 US

Shipper:
Gordon Watts
Gordon Watts
821 ALICIA RD
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

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

Homeowner's Help Line, Mortgage Bureau

E-mail Address: Webmaster@atg.state.IL.us ; PH: (312) 814-3000 (Chicago) ; (217) 782-1090 (Springfield)

c/o: Illinois Attorney General Lisa Madigan, 100 West Randolph Street, Chicago, IL 60601

Date: Saturday, 07 May 2016 ; **Subject: Reverse Mortgage Scam not unlike the famous 'Lessie Towns' case**

Dear Mortgage Bureau: After speaking by phone with the OAG, I was invited to send documentation related to the crimes I allege. Please note that I contacted your office a few months back (see FedEx delivery confirmation in the enclosures), but I never heard back, so I'm following up. **To recap:** My friend, Mr. Richard B. Daniggelis (direct cell: 312-774-4742), got under water with his mortgage & put out an ad in the paper for help refinancing, investment, tenants, and/or the like. (I'm not sure of the details, but you may ask him.) In any event, Paul L. Shelton, who lost both his broker's and law licenses for reverse mortgage scams –and other financial crimes, along with Joseph Younes, who is presently under investigation by the IARDC for such matters, replied to his ad. Both claimed to be willing to help him. In the course of things, Daniggelis signed some paperwork related to the mortgage rescue, but never consented to selling the house, nor is there ANY record of him EVER having gotten paid for it. Since no contract is valid without 'consideration,' this alone invalidates any purported 'sale,' but there were *many* frauds uncovered, one, I'm told, resulting in a huge settlement with the title company (damning proof of fraud). The settlement appears to be 'confidential,' as it's not in the court record, but I'll bet you can get it with a search warrant and/or subpoena if needed. However, ALL OTHER proof of fraud is in the record. Richard repeatedly tried to get this matter investigated (see, for example, several affidavits he filed, both in court and in the recorder's office), but both your office and the local police, kept passing the buck back & forth to each other, until the Statutes of Limitations ran out. (((The police even kept telling him to go to different divisions, running him in circles, and if that's not bad enough, they would not even give him copies of his own records! For God's sake, this is criminal: I, myself, would probably have no troubles getting copies under the Freedom of Information Act, were I to contact them in my capacity as the legal reporter for *The Register*, so why in God's name would your police keep telling Richard to “go get his attorney” for a simple records request!))))

I attempted to file a friend of the court brief (my right under your state's law – indeed, a Federal Appeals court let me file a similar brief in one of the recent 'Gay Marriage' cases, even tho I was not a party, so why are IL courts so uptight?). Moreover, the court “snatched away” Daniggelis' house, and put the title in Younes' name, and Judge Otto's order doing to gives NO legal basis for this illegal act. Lastly, when I wasn't allowed to supplement the record on appeal (the trial court's duty, not the appeals court), I appealed *that*, but wasn't allowed to waive the filing fees, even though I legally qualify for a “298” poverty exemption. Judge James Flannery lied about me, falsely claiming that I was trying to represent Daniggelis or otherwise file on his behalf. **You can inspect the court records: That is a lie:** I was merely asking to file an *amicus* and such, on behalf of myself, like others often do – my legal right. The courts not only entered an illegal ruling for their lawyer buddy, Younes (implying cronyism, or worse), but the court has (illegally) denied/opposed all relief so far. Likewise, the pending appeals are, I'm guessing, 'sham' appeals, not seriously considering the crimes committed. I think that because the appeals court also (illegally) denied my rights to file an *amicus* brief. (You can pull the appellate filings—or simply take my word here.) **A few months back, I sent a FedEx package of court docs to your Springfield office, but never heard back.** Note: One assistant state attorney, with whom I spoke, was sincere, but he was sincerely wrong in his claims that the he couldn't help Daniggelis because the 'Statutes of Limitations' could not be equitably tolled. (See the enclosed Saturday, 30 April 2016 'Cross-Reply' to the IARDC's Albert Krawczyk for proof that I'm legally correct that he made a legal mistake here.) Lastly, you might be wondering why Daniggelis' attorney, Andjelko Galic, does not pursue this with the SAO, OAG, IARDC, IDFP, news media, etc.? (In fact, Galic has tried to discourage myself and Daniggelis from pursuing this!) Galic hasn't said, but I've spoken with both Mr. Daniggelis as well as Robert J. More (708-495-1027 ; Anselm34@gmail.com), a former “non-paying” tenant of Daniggelis, and all 3 of us suspect that Galic is probably afraid of some sort of retaliation from the 'Chicago machine' courts, strongly implying that the history of corruption in your state **has not been completely cleaned out.** I tell you this in case Galic is uncooperative so that you can know not to be dissuaded or see this as an excuse to “give up” & pass the buck back to Galic. **To conclude:** One of the perpetrators (Shelton) is a multiple-repeat offender, who got famous for trying to scam Lessie Towns, and when then-Gov. Pat Quinn visited her, that made news. Towns actually *was* careless & signed away her house, but she was scammed. Yet, she got relief from the authorities. How much *more* is Daniggelis deserving of your help? **If you can show me ANY legal basis for the courts to simply 'snatch' Daniggelis' house & give it to Younes, I will admit I'm wrong and drop the matter. If not, I will respectfully ask your agency, the OAG, to pursue this matter.**

With kind regards, I am, Sincerely,

Gordon Wayne Watts



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- Track & Manage
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- Business
- International
- Help

USPS Tracking®

Legal paperwork related to Mortgage Rescue Scam done to my friend, Mr. Richard B. Daniggelis. Sent to ILLINOIS Atty General's Office
Gordon Wayne Watts

Tracking Number: 9505514554496128037874

Expected Delivery Day: Monday, May 9, 2016

Product & Tracking Information

Postal Product: Priority Mail 2-Day™
Features: Insured
 USPS Tracking®

DATE & TIME	STATUS OF ITEM	LOCATION
May 9, 2016, 11:34 pm	Delivery status not updated	
The delivery status for this item has not been updated as of May 9, 2016, 11:34 pm.		
May 9, 2016, 9:34 am	Out for Delivery	CHICAGO, IL 60601
May 9, 2016, 9:24 am	Sorting Complete	CHICAGO, IL 60601
May 9, 2016, 7:43 am	Arrived at Post Office	CHICAGO, IL 60601
May 9, 2016, 1:41 am	Arrived at USPS Destination Facility	CHICAGO, IL 60607
May 7, 2016, 11:07 pm	Arrived at USPS Origin Facility	TAMPA, FL 33605
May 7, 2016, 10:24 am	Acceptance	LAKELAND, FL 33815

In-Transit

Available Actions

- Text Updates
- Email Updates

Customer Service
Have questions? We're here to help.

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Date and Time Properties

Date: May 2016

Time Zone: Internet Time

S	M	T	W	T	F	S
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8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

Current time zone: Eastern Daylight Time

Time: 1:04:05 PM



Illinois Department of Financial and Professional Regulation

Division of Real Estate

Bruce Rauner
Governor

Bryan A. Schneider
Secretary

Bryan A. Schneider
Acting Director
Division of Real Estate

September 9, 2015

GORDON WAYNE WATTS
821 Alicia Rd
Lakeland, FL 33801-2113

RE: PAUL L SHELTON; JOSEPH YOUNES
Case 2015-07941

Dear GORDON WAYNE WATTS:

This letter acknowledges the receipt of your recent complaint. The Department of Financial and Professional Regulation has referred your complaint information to the appropriate division for initial screening to determine if any applicable state regulations may have been violated.

The information you have provided is being evaluated by our staff to determine the most appropriate course of action. If the Department is unable to proceed with your complaint, you will receive a letter advising of such.

Should your complaint result in the opening of an investigation, you may be contacted by a Department investigator seeking additional information. At that time, your cooperation will be required. The Department will then conduct an investigation to determine whether the allegations violated the respective state statute.

The file reference number that has been assigned to your complaint can be found listed above; please refer to this number in any future communication with the Department.

Thank you for bringing this matter to our attention.

Sincerely,

Complaint Intake Unit

Received by me:
- Circa 5:00 12 Sept 2015



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, Illinois 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

3161 West White Oaks Drive, Suite 301
Springfield, IL 62704
(217) 546-3523 (800) 252-8048
Fax (217) 546-3785

Gordon Watts
821 Alicia Road
Lakeland, FL 33801-2113

Chicago
May 20, 2016

Re: Paul Leslie Shelton
in relation to
Gordon Watts
No. 2015IN03388

Dear Mr. Watts:

Thank you for your recent letter replying to Mr. Younes' response and asking for the reconsideration of the investigations involving Mr. Younes and Mr. Shelton. As you mentioned in your letter, I accidentally sent you Mr. Younes' response with a cover letter pertaining to the instant matter, involving Mr. Shelton. As you know, when I initially received your request for investigation concerning Mr. Shelton's conduct in the Daniggelis matter, I sent him a request to respond to your allegations, to which he never replied. Had Mr. Shelton replied to your allegations, I would have sent you a copy of his reply for your comment.

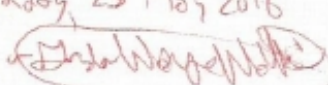
After reviewing your communication, I find that there is no reason to reopen the investigation in to Mr. Shelton's conduct. As I stated in letter to you, dated December 24, 2015, pursuing your allegations of misconduct would not affect Mr. Shelton's ability to practice law in Illinois, as he has now been disbarred. Thus, while we will add your recent reply to our file, the file will remain closed.

Thank you for bringing this matter to our attention. If you have any questions, please contact me at (312) 565-2600.

Very truly yours,


Rita C. Greggio
Counsel

RCG:ccc
MAINLIB_#759732_v1

Received in
US Postal MAIL
Box - today,
Monday 23 May 2016


Richard Daniggelis' house: 1720 N. Sedgwick St., Chicago, IL 60614 (pan view) Exhibit-E
[[Photo credits for Exhibits E, F, and G, *infra*: Mr. Lorenz Joseph (LenzVideo@yahoo.com), professional photographer, Chicago, IL, USA]]



STOP WORK ORDER

City of Chicago
Department of Buildings

Pursuant to Section 13-12-080 of the Municipal Code, I hereby ordered that all construction work cease immediately at

1720 N. SEDGWICK ST.

PENDING

for violation of the following section(s) of the Chicago

13-12-080

Violation: NO PLANS OR PERMITS
FULL REHAB - STOP WORK
ALL TRADES

Any person continuing such work in violation of this order shall be prosecuted to the fullest extent of the law, including a fine of up to \$5,000 for each violation.

SKALA

746

8-13-2015

312-743-35

This notice shall not be removed without express written approval from the Department of Buildings.

Office of the Sheriff of Cook County
Thomas J. Dart, Sheriff

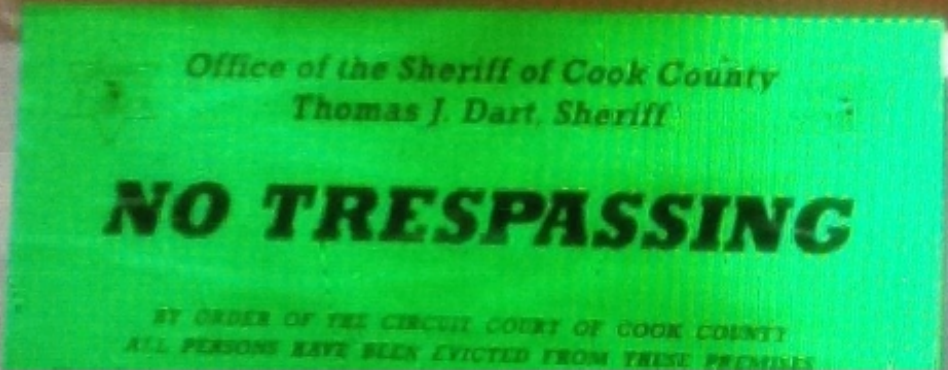
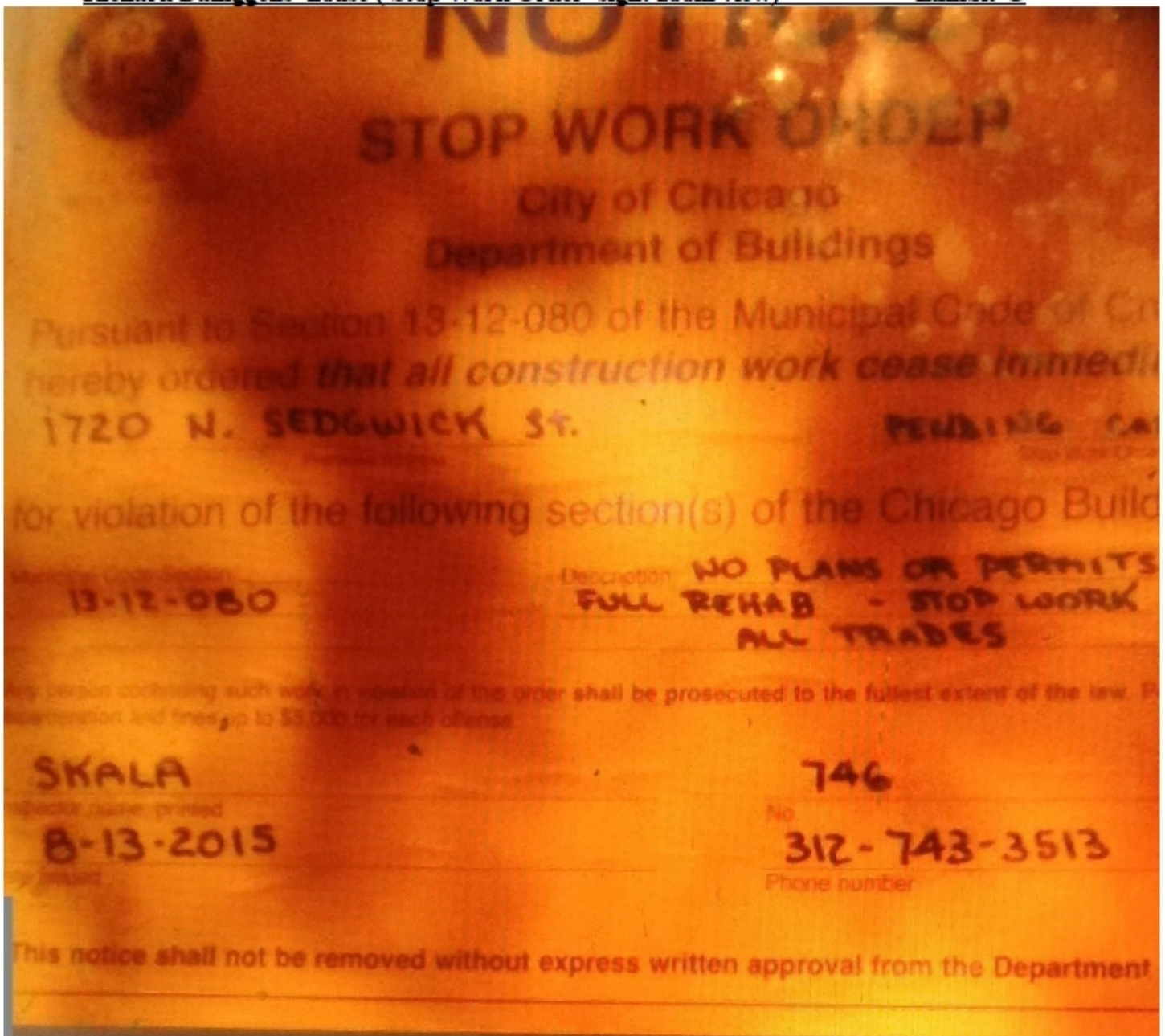
NO TRESPASSING

BY ORDER OF THE CIRCUIT COURT OF COOK COUNTY
ALL PERSONS HAVE BEEN EVICTED FROM THESE PREMISES

1720 N. SEDGWICK CHICAGO

DATE: 12 JUL 15 BY: Deputy Sheriff [Signature] 1092

Circuit Court Case Number 14CM1701473





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USPS Tracking®

**Legal paperwork related to Mortgage Rescue Scam done to my friend,
 Mr. Richard B. Daniggelis. Sent to Cook County, IL State's Attorney Office.**

~ Gordon Wayne Watts

Customer Service
 Have questions? We're here to help.

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Tracking Number: EL118209865US



In-Transit

Scheduled Delivery Day: Monday, May 9, 2016, 3:00 pm
 Money Back Guarantee

Product & Tracking Information

Postal Product: Priority Mail Express 2-Day™
Features: Insured PO to Addressee
 Up to \$100 insurance included
 Restrictions Apply

DATE & TIME	STATUS OF ITEM	LOCATION
May 7, 2016, 11:07 pm	Arrived at USPS Origin Facility	TAMPA, FL 33605
Your item arrived at our TAMPA, FL 33605 origin facility on May 7, 2016 at 11:07 pm. The item is currently in transit to the destination.		
May 7, 2016, 10:22 am	Acceptance	LAKELAND, FL 33815

Date and Time Properties

Date & Time Time Zone Internet Time

Date: May 2016

Time: 4:09:54 AM

Current time zone: Eastern Daylight Time

OK Cancel Apply

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Tracking (or receipt) number

Manage Incoming Packages

Track all your packages from a dashboard.
 No tracking numbers necessary.

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

David Williams, Assistant State Attorney, Financial Crimes Division

E-mail Address: David.Williams@CookCountyIL.gov ; PH: (773) 674-2728 ; (773) 674-6283

c/o: Anita Alvarez, State's Attorney, Cook County, IL, 69 West Washington St., Suite 3200, Chicago, Illinois 60602

Date: Saturday, 07 May 2016 ; Subject: Financial Crimes in your area

Dear David: Thank you for speaking with me by phone yesterday morning.

To recap our conversation, here's a summary: My friend, Mr. Richard B. Daniggelis (direct cell: 312-774-4742), got under water with his mortgage and put out an ad in the paper for help refinancing, investment, tenants, and/or the like. (I'm not sure of the details, but you may ask him.) In any event, Paul L. Shelton, who lost both his broker's and law licenses for reverse mortgage scams – and other financial crimes, along with Joseph Younes, who is presently under investigation by the IARDC for such matters, replied to his ad, and claimed to be willing to help him. In the course of things, Daniggelis signed some paperwork related to the mortgage rescue, but never consented to selling the house, nor is there ANY record of him EVER having gotten paid for it. Since no contract is valid without 'consideration,' this alone stops any purported sale, but there were many frauds uncovered, one, I am told, resulting in a huge settlement with the title company (damning proof of fraud). The settlement appears to be 'confidential,' as it's not in the court record, but I'll bet you can get it with a search warrant and/or subpoena if needed. However, ALL OTHER proof of fraud is in the record. Richard repeatedly tried to get this matter investigated (see, for example, several affidavits he filed, both in court and in the recorder's office), but both your office and the local police, kept passing the buck back & forth to each other, until the Statutes of Limitations ran out. (((The police even kept telling him to go to different divisions, running him in circles, and if that's not bad enough, they would not even give him copies of his own records! For God's sake, this is criminal: I, myself, would probably have no troubles getting copies under the Freedom of Information Act, were I to contact them in my capacity as the legal reporter for *The Register*, so why in God's name would your police keep telling Richard to “go get his attorney” for a simple records request!))))

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With kind regards, I am, Sincerely,

Gordon Wayne Watts



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Legal paperwork related to Mortgage Rescue Scan done to my friend, Mr. Richard B. Damigellis. Sent to Cook County, IL State's Attorney Office.

Gordon Wayne Watts

Tracking Number: **EL118209865US**

Scheduled Delivery Day: **Monday, May 9, 2016, 3:00 pm**
 Money Back Guarantee

Product & Tracking Information

Postal Product: Priority Mail Express 2-Day™
Features: Insured, Up to \$100 insurance included, Restrictions Apply (i)
 PO to Addressee

DATE & TIME	STATUS OF ITEM	LOCATION
May 7, 2016, 11:07 pm	Arrived at USPS Origin Facility	TAMPA, FL 33605
May 7, 2016, 10:22 am	Acceptance	LAKELAND, FL 33815

Your item arrived at our TAMPA, FL 33605 origin facility on May 7, 2016 at 11:07 pm. The item is currently in transit to the destination.

In-Transit

Search or Enter a Tracking Number

Customer Service
 Have questions? We're here to help.

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Date and Time Properties

Date: May 2016

S	M	T	W	T	F	S
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8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

Time: 4:09:54 AM

Current time zone: Eastern Daylight Time

OK Cancel Apply

Track Another Package

Tracking (or receipt) number

Manage Incoming Packages

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