

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

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.	)	
aka: “LaSalle Bank National Association,” aka “US Bank,	)	<b>Case No.: 2007 CH 29738</b>
NA,”as trustee for Morgan Stanley Loan Trust 2006-16AX,	)	
Plaintiff	)	Before:
vs.	)	Hon. Diane M. Shelley,
	)	Presiding Judge assigned –
Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,	)	or whichever other judge
Defendants	)	may so preside in Law Div.

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**AFFIDAVIT OF GORDON WAYNE WATTS**

**STATE OF FLORIDA  
COUNTY OF POLK**

Before me, the undersigned Notary, on this \_\_\_\_\_ day of \_\_\_\_\_, 2017, personally appeared Gordon Wayne Watts, 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, Gordon Wayne Watts, declare (certify, verify, & state) under penalty of perjury, under the laws of the United States of America and the States of Florida and Illinois, that the the following statements are all true & correct to the best of my knowledge: I personally know Richard B. Daniggelis, one of the defendants in the above-captioned case. In a prior Affidavit, dated Sept. 08, 2015, on record with this court (“Activity Date: 9/14/2015,” on docket), I was compelled, by my conscience, after having carefully searched out & investigated all the events accurately, from the very beginning, to write an orderly account for This Court, so that the **Illinois State Court system** may know the exact truth about the things regarding my friend, Richard's plight. Mr. Daniggelis made me aware of mortgage fraud, which, after investigating (by me obtaining court records under many Public Records requests), I confirmed was a true allegation on his part.

**However, I discovered that This Court had not been made aware of much of the proof that I found through my own personal research.** So, I felt a moral obligation to bring to the attention of This Court said proof (which I've been and am now doing via these filings). You are invited, therefore, to read it with goodwill & attention, and to be indulgent in cases where, despite my diligent labour in recalling events, I may seem to have recalled some events imperfectly. I am, after all, only human: not only this affidavit, but even my accompanying *Amicus Curiae* itself, and the requisite legal arguments & conclusions I draw. [And, in cases where there's a question about my recollection of events, I invite This Court to depose & question Mr. Daniggelis, Mr. Galic his attorney, Mr. Younes, whom I'm accusing of several felony criminal acts, & any others about whom you have questions, but especially Mr. Daniggelis, who is the 'principal,' and who has complete knowledge of the case, but has often not been allowed to speak by those in authority, and who isn't as skilled as myself in the typing up of statements, legal arguments, & the requisite research needed to adduce deep legal matters.]

Given the gravity of the matter – and what is at stake – I am not merely making a “Statement of the Case/Facts,” but rather a sworn, witnessed, & notarised AFFIDAVIT instead (as I did before), in order to give full legal effect to my affirmations & recollections—and attach my name & reputation to my statements, so that it may be clearly understood by all readers that I am not knowingly making false or misleading statements, but rather testifying the truth, the whole truth, and nothing but the truth—so help me Almighty God.

**FURTHER AFFIANT SAYETH:** — (1) The statements and affirmations of fact contained in the Affidavit of *Amicus*, Gordon Wayne Watts, filed on Tuesday, September 08, 2015 (and dated as “Activity Date: 9/14/2015,” on docket) are incorporated by reference herein as if fully set forth herein. I am the sole author of this affidavit, the accompanying proposed *Amicus Curiae* brief, and the related motion(s) for leave to file and notice(s) thereof. The following chronology of the facts picks up where I left off in my Sept. 08, 2015 affidavit:

(2) When writing my prior sworn Affidavit & *Amicus* brief, I discovered that Joseph Younes was engaged in illegal construction and/or demolition of Mr. Daniggelis' house at 1720 N. Sedgwick (legally Mr. Younes', but really Mr. Daniggelis', as Younes obtained it by fraud). I, therefore, made This Court aware that Younes was trying to destroy the house and thus moot the (then) pending appeals (in Civil & Chancery), and, also, this pending case (in the Law Division). To that end, I submitted to This Court a “Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi*-Emergency Fashion by OVERNIGHT FedEx,” dated September 09, 2015, and filed on docket as “NOTICE FILED,” on “Activity Date: 9/14/2015” by “Attorney: PRO SE.”

(3) As proof of my strong allegations, I included (in the EXHIBITS) photographs of a City of Chicago “STOP WORK ORDER,” on Daniggelis' house, which I obtained by hiring a professional photographer in your city (since I, from Florida, couldn't take photos myself).

(4) Despite the solemn warnings I issued to This Court (and others), The Court failed to issue a TRO (Temporary Restraining Order) or Injunction to put a stop to this illegal activity.

(5) As a result of the cops/courts turning a blind eye to my late-2015 solemn warnings, Younes was allowed to proceed unchecked, and has now, in early-2017, almost destroyed the house, resulting in a huge public debacle, now appearing as in no less than two (2) news outlets, as documented below and/or in Exhibits:

((a)) “‘Rotted’ Historic Building In Old Town Triangle Could Be Seized By City,” by Ted Cox, *DNAinfo*, March 30, 2017: <https://www.DNAinfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city>

((b)) “‘Rotted’ Old Town Triangle House Owner Faces Daily \$1K Fine As Charges Fly,” by Ted Cox, *DNAinfo*, April 07, 2017: <https://www.DNAinfo.com/chicago/20170407/old-town/rotted-old-town-triangle-house-owner-faces-daily-1k-fine-as-charges-fly>

((c)) “Chicago Courts refuse to stop illegal construction/demolition: ‘Mortgage Rescue Scam’ victim's house almost destroyed,” from Staff Reports, *The Register*, April 14, 2017:

perma-link: <http://GordonWatts.com/#MortgageFraud-2017UPDATES> or:

perma-link: <http://GordonWayneWatts.com/#MortgageFraud-2017UPDATES>

((d)) “Chicago Courts refuse to help elderly 'Mortgage Rescue Scam' victim; make him homeless,” from Staff Reports, *The Register*, December 01, 2015:

perma-link: <http://GordonWatts.com/#MortgageFraud-2015> or:

perma-link: <http://GordonWayneWatts.com/#MortgageFraud-2015>

(6) The trial courts (Chancery, Civil, & Law Division) eventually (after several mishaps) performed their Ministerial Duty to docket and file the affidavits & legal arguments (*Amicus* briefs, etc.), which I had filed with them, but the trial courts refused to act upon my proof of Felony Forgery Fraud – instead focusing on the attorneys of record (both whom neglected to offer the proof which I offered, regarding the issue of identical signatures being photocopied).

(7) After much frustration, I asked both Richard Daniggelis and numerous others in the Chicago area why very intelligent, and apparently dedicated trial court judges would refuse to rule justly for a mortgage fraud victim when clear evidence of forgery fraud was presented to them. All parties told me that they thought that the trial court judges were 'biased' or words to that effect in favour of helping the large mortgage companies and/or other lawyers (such as Mr. Younes, who is a lawyer).

(8) Mr. Daniggelis offered a more detailed explanation of this phenomenon, telling me that Andjelko Galic, his attorney, had told him that the trial court judges in Chancery are pressured to “clear the books” (or words to that effect) of mortgage cases where mortgage companies are litigants. [This might prove an 'emotional' or 'charged' recollection, so I invite The Court to speak to Mr. Daniggelis, and then to Mr. Galic, to get the exact exchange in question, reminding This Court that while my 'hearsay' might not be sufficient to convict, it is most definitely strong enough to pass the 'reasonable suspicion' standard, which would give This Court justification to query Daniggelis & Galic about this & other matters.]

he thought that Judge Otto was influenced by

1. Lawsuit against Younes filed: Bank America NA filed Contract complaint on: **07-03-2012**
2. Younes complaints to OAG about Linda Green conspiracy: Feb 06, 2013
3. Sweet Loan Mod: Sept 11, 2013 or Oct 15, 2013 (US Bank & Younes)
4. Lawsuit against Younes dropped: Dismiss by stipulation or agreement: **10-23-2013**
5. Otto rules in favour of Younes: May 15, 2014

**FURTHER AFFIANT SAYETH NAUGHT.**

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Gordon Wayne Watts, Affiant

**STATE OF FLORIDA  
COUNTY OF POLK**

The foregoing instrument was acknowledged, subscribed, and sworn before me this \_\_\_\_\_ day of \_\_\_\_\_, 2015, by GORDON WAYNE WATTS, 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: (\*) \_\_\_\_\_

(\*) In compliance with Rule 138, ILLINOIS SUPREME COURT RULES, “Personal Identity Information” (b)(2), “driver’s license numbers,” I am not including my full Driver's License Number. However, in accordance with Rule 138 (c)(2), “A redacted filing of personal identity information for the public record is permissible and shall only include: **the last four digits** of the driver’s license number.” Therefore, I am asking This Notary to use only the last 4 digits.

See: [http://www.IllinoisCourts.gov/supremecourt/rules/art\\_ii/artii.htm](http://www.IllinoisCourts.gov/supremecourt/rules/art_ii/artii.htm)

Notary Public: \_\_\_\_\_ Date: \_\_\_\_\_

(Notary Stamp) My Commission Expires: \_\_\_\_\_