



**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – CHANCERY DIVISION  
MORTGAGE FORECLOSURE / MECHANICS LIEN SECTION**

<b>GMAC Mortgage, LLC aka “US Bank, N.A.,” etc.,</b>	)	
	)	<b>Case No. 2007-CH-29738</b>
<b>Plaintiff</b>	)	
	)	<b>1720 N. Sedgwick Ave.</b>
<b>vs.</b>	)	<b>Chicago, IL</b>
	)	
<b>Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,</b>	)	<b>Before:</b>
	)	<b>Hon. Michael F. Otto #2065</b>
<b>Defendants</b>	)	<b>Associate Judge, Chancery</b>

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**MOTION FOR REHEARING**

The undersigned is in receipt of the 10/29/2015 Order of This Court (Exhibit-A), Hon. Michael F. Otto, Associate Judge #2065, of the Chancery Division, presiding – striking and/or denying the various motions by the undersigned in the above-captioned case. **For the reasons stated below, some of This Court's orders are found to be decided correctly** – and other orders are found to be decided incorrectly. To that end, this motion seeks a rehearing of that portion of the court's orders found to be decided incorrectly as a matter of law.

There are two (2) categories of the court's order that bear relevance: Adjudication “on the merits” and a request to “supplement the record” on appeal. Although the trial court decided incorrectly on one portion of this case – and that not after an almost three (3) month delay in this potentially “life-or-death” issue<sup>1</sup>, nonetheless, it is freely acknowledged that the trial court judge gave an *excellent* review of the Mr. Watts' filings, thereby granting “Procedural Due Process,” even if “Substantive Due Process” was egregiously denied movant.

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<sup>1</sup> As explained in initial filings by the undersigned, defendant, Mr. Daniggelis, is an elderly, 76-year-old gentleman. This *alone* isn't sufficient justification to find in his favour; however, when he became homeless (read: 'life or death') due solely to a “mortgage fraud rescue scheme” by a known perpetrator –Atty. Paul L. Shelton– who, in 2009, became famous for doing the same thing to Ms. Lessie Towns, another elderly victim, to the point that former Gov. Pat Quinn (D-Ill.) paid Towns a personal visit to sign into law legislation addressing mortgage fraud, this placed the Judiciary in bad light in the public eye –and made an already bad situation even worse: Daniggelis, unlike Towns, wasn't tricked into signing his property away, thus he's even *more* a victim: he lost it through forgery, as the record shows, yet got no monies in return. That he received no 'consideration' for his 'sale' *alone* makes this translation illegal, but – *and more importantly* – it is unthinkable/unreasonable that someone would simply “give away” a lush property with hundreds of thousands of dollars in equity in it-as the trial court apparently claims.

Perhaps the best way to explain where the trial court (Chancery Division) erred – and why – a 'fictitious order' from an ideally fair appeals panel can be used. – *To that end, see below:*

**2015 IL App (1st) 123456**

FIRST DIVISION  
NOVEMBER 30, 2015

**1-14-2751**

**NOTICE:** This order is fictitious & views expressed don't necessarily reflect the actual views of the IL 1<sup>st</sup> Appellate Court –*but they should*. It is merely being used to illustrate legal points in the limited circumstances allowed under Rules 345 (*Amici Curiae*) & 329 (omissions in the record).

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IN THE  
APPELLATE COURT OF ILLINOIS  
FIRST JUDICIAL DISTRICT

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GMAC Mortgage, LLC aka “US Bank, N.A.,” etc.,	)	Appeal from the
	)	Circuit Court of
Plaintiff	)	Cook County
	)	
vs.	)	No. 07 CH 29738
	)	
Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,	)	Honourable
	)	Michael F. Otto,
Defendants	)	Assoc Judge Presiding.

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APPEAL from a judgment of the circuit court for Cook County: MICHAEL F. OTTO, Judge.  
***Affirmed in part. Reversed in part. Remanded for proceedings consistent with this opinion.***

*Before TOM, C.J., DICK, and HARRIET, JJ.*

CHIEF JUSTICE TOM delivered the judgment of the court.  
JUSTICES DICK and HARRIET concurred in the judgment with respect to the denial of leave to file an *Amicus Curiae* brief. JUSTICE HARRIET writes a separate dissent with respect to the majority opinion to grant leave to supplement the record on appeal.

¶1 **TOM, C.J.** Gordon Wayne Watts appeals the decisions of the trial court denying him leave to file an *Amicus Curiae* brief and leave to supplement the record on appeal. Watts, apparently unfamiliar with the rules of procedure, assumed that his filings would “automatically” get into the record, which was, by that time, already under appeal and being reviewed by our panel (thus, he thought, obviating his need to “supplement the record”). Watts

also argues that his proposed *Amicus* brief sheds new light on the case that the existing attorneys on both sides missed. With respect to his desire to supplement the record, he argues that his filings would have gotten into the record but for a delay that was not his fault. We agree with Watts that his argument on that head is reasonable and the trial court's denial of leave to supplement the record is unconstitutional and unreasonable as applied to him. We therefore reverse that portion of the judgment denying Watts leave to supplement the record on appeal. We, however, uphold the lower tribunal's denial of his motion for leave to file an *Amicus Curiae* brief, and discuss both issue at length below.

### **BACKGROUND**

¶2 On October 17, 2007, defendant, Daniggelis, was foreclosed on, and, in a strange turn of events, somehow had the title transferred out of his name and into the name of another co-defendant, Atty. Joseph Younes, Esq., who, working with Atty. Paul L. Shelton, Esq., purportedly attempted to help him with his foreclosure distress –in ways that aren't clear (and not relevant to the instant ruling). At some point, Mr. Watts, an acquaintance of Daniggelis and several other parties/participants to this case (Mr. Robert J. More and Daniggelis' attorney, Andjelko Galic, at the least) became aware of Daniggelis' claims of a “mortgage fraud rescue scheme” and attempted to investigate & document *or refute* Daniggelis' claims.

¶3 As Watts tediously documents in his filings, he made numerous attempts to obtain court documents under IL Public Records law, but was, for reasons not his fault, unsuccessful for *well-over* a year to obtain any court records in Daniggelis' case. This (he claims) delayed his ability to investigate (and therefore file in) this case. On August 10, 2005, Watts was finally able to file pleadings in both this case (2007-CH-29738, *GMAC v. Daniggelis* in CHANCERY, which held Daniggelis wasn't the owner of his house & property) and the sister case (2014-M1-701473, *Younes v. Daniggelis* in CIVIL, a FORCIBLE ENTRY AND DETAINER COMPLAINT case enforcing eviction from his home). On 9/14/2015, Watts also was able to file in the sister case in the LAW Division, a CONTRACT case by the same file number: 2007-CH-29738. However, the trial courts were silent for almost three (3) solid months, not ruling on Watts' pleadings until the October 29, 2015 ruling by Judge Otto, which is presently being appealed before this panel.

### **TIME-LIMITS FOR REHEARING**

¶4 Mr. Watts, not an attorney, waited until the “last minute” to file his request for a rehearing, and, because we feel that there may be some misunderstanding on this head, we address the timeliness issues today: The lower court entered a ruling on 10/29/2015, as reflected by the docket in the screenshot (Exhibit-A) that Watts is providing us today. (There was not a time-stamped date on the ruling he received, which is questionable activity of the lower court, but probably not necessarily a fatal flaw, and certainly reasonable given the heavy workload that the trial court has.) **735 ILCS 5/2-1203 gives Watts 30 days to file a motion for rehearing:**

#### **(735 ILCS 5/2-1203) (from Ch. 110, par. 2-1203)**

Sec. 2-1203. Motions after judgment in non-jury cases.

(a) In all cases tried without a jury, any party may, within 30 days after the entry of the judgment or within any further time the court may allow within the 30 days or any extensions thereof, file a motion for a rehearing, or a retrial, or modification of the judgment or to vacate the judgment or for other relief.

Since 5 ILCS 70/1.11 states that “The time within which any act provided by law is to be done shall be computed by excluding the first day and including the last...” this would normally allow Watts until Saturday, 11/28/2015. However, since IL Code of Civil Procedure precludes Saturdays, Sundays, and holidays, then the law tolls (suspends) the time-limit and allows Watts until the following Monday, 11/30/2015 to file his motion for rehearing:

**(5 ILCS 70/1.11) (from Ch. 1, par. 1012)**

Sec. 1.11. The time within which any act provided by law is to be done shall be computed by excluding the first day and including the last, unless the last day is Saturday or Sunday or is a holiday as defined or fixed in any statute now or hereafter in force in this State, and then it shall also be excluded. If the day succeeding such Saturday, Sunday or holiday is also a holiday or a Saturday or Sunday then such succeeding day shall also be excluded.

(Source: Laws 1968, p. 155.)

However, this doesn't address mailing delays, which the Illinois Supreme Court Rules *does*:

**Rule 373. Date of Filing Papers in Reviewing Court; Certificate or Affidavit of Mailing**

Unless received after the due date, the time of filing records, briefs or other papers required to be filed within a specified time will be the date on which they are actually received by the clerk of the reviewing court. If received after the due date, the time of mailing, or the time of delivery to a third-party commercial carrier for delivery to the clerk within three business days, shall be deemed the time of filing. Proof of mailing or delivery to a third-party commercial carrier shall be as provided in Rule 12(b)(3). This rule also applies to a motion directed against the judgment and to the notice of appeal filed in the trial court.

**Rule 12. Proof of Service in the Trial and Reviewing Courts; Effective Date of Service**

**(b) Manner of Proof.** Service is proved:(1) by written acknowledgment signed by the person served;

(3) in case of service by mail or by delivery to a third-party commercial carrier, by certificate of the attorney, or affidavit of a person other than the attorney, who deposited the document in the mail or delivered the document to a third-party commercial carrier, stating the time and place of mailing or delivery, the complete address which appeared on the envelope or package, and the fact that proper postage or the delivery charge was prepaid; or...

Rule 373 states, in relevant part, that this standard also applies to a motion directed against a judgment in the trial court – *which is the case here*, in Watts' motions above, referenced in this fictitious order of the appeals court. Originally, this rule provided that the time of mailing might be evidenced by the post mark affixed by a US Post Office. Because of problems with legibility of post marks, the rule was amended in 1981 to provide for the use of Rule 12 affidavits.

So, Watts has an obligation, under the rules of this court, to complete, mail, and certify his motion for rehearing by 11:59:59 P.M. this Monday the 30<sup>th</sup> of November 2015. *(However, given all the troubles Watts has had in getting as fair review of his motions, affidavits, and other filings, the portion of 735 ILCS 5/2-1203 which reads “or within any further time the court may allow within the 30 days or any extensions thereof” should be considered – and applied – if reasonably needed, to extend time, effect justice, and otherwise “level the playing field.”)*

### **Motion for Leave to file an *Amicus Curiae* brief**

¶5 We now turn to Watts' request for leave to file an *Amicus Curiae* brief in this case (and the related cases). As all parties have agreed, the “merits” of case are presently being appealed before our court in case number 1-14-2751, and the lower court has lost subject matter jurisdiction. However, Watts, when initially filing *Amici* briefs in the various trial courts below, either did not notice that the case was on appeal and/or did not know that the trial court had lost jurisdiction to entertain a motion for leave to file an *Amicus* brief. The trial court, even if it wanted to, could not grant such a motion, and for that reason *alone*, we must affirm the lower tribunal's holding on this head.

¶6 We therefore commend the trial court for attempting to address this point, in light of the 'mootness' of the arguments/facts –and its obvious inability to take any judicial action. That the trial court judge even *attempted* to offer legal analysis was clear evidence that he'd reviewed *all* the pleadings, and therefore, granted substantive proof of PDP (Procedural Due Process)<sup>2</sup>. However, we write to clear up gross misunderstandings of issues surrounding the request for leave to file an *Amicus*. While not *as* legally relevant as the above, meeting the *Amicus* standard *would* impact the supplement/record issue somewhat, so we address that below.

### **Motion to Supplement**

¶7 Next, we turn to Watts' request to supplement the record on appeal. The trial court, on page 2 of its order (Exhibit-A), claims that: “Mr. Watts cites no authority, nor has the court's own research uncovered any, which would permit a stranger to supplement the record.” **The claim that Watts failed to cite legal authority is *absurd*, in light of a clear reading of Watts' filings:** Mr. Watts clearly lays out the Rule 329 authority and arguments in the pleadings in the trial court's possession – *and available in multiple places online*:

[http://GordonWatts.com/MortgageFraudCourtDocs/2007-CH-29738-Aug16-2015-](http://GordonWatts.com/MortgageFraudCourtDocs/2007-CH-29738-Aug16-2015-MotionToSupp-GordonWayneWatts.pdf)

[MotionToSupp-GordonWayneWatts.pdf](http://GordonWatts.com/MortgageFraudCourtDocs/2007-CH-29738-Aug16-2015-MotionToSupp-GordonWayneWatts.pdf)

mirror:

[http://GordonWayneWatts.com/MortgageFraudCourtDocs/2007-CH-29738-Aug16-2015-](http://GordonWayneWatts.com/MortgageFraudCourtDocs/2007-CH-29738-Aug16-2015-MotionToSupp-GordonWayneWatts.pdf)

[MotionToSupp-GordonWayneWatts.pdf](http://GordonWayneWatts.com/MortgageFraudCourtDocs/2007-CH-29738-Aug16-2015-MotionToSupp-GordonWayneWatts.pdf)

In his opening statements, Watts cites to Supreme Court Rule 329 (Supplemental Record on Appeal) and clearly lays out how he had attempted to file in the case *long before* it was

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<sup>2</sup> **Procedural Due Process (PDP)**, in both civil and criminal proceedings, is the right to fundamental fairness, which guarantees a party the “right to be heard” in such proceedings, ensures all parties receive “proper notification” throughout the litigation, and requires

appealed.

¶8 The relevant fact here is that even had Watts' filings been “chicken scratch,” they would have been dutifully scanned in, docketed, and included in the record on appeal – all ministerial duties of the trial court. It bears mentioning that Mr. Robert J. More, who is a party of record [*according to the docket (Exhibit-B1) – which misspells his last name as 'Moore'*] is allegedly trespassed off the court's property, and (if you look at his filings) is a 'vexatious litigant' under current sanction (Exhibit-B2). (It is surprising, therefore, that Mr. More can even file *at all*.) Whether More's legal arguments are valid or not, one gets a headache trying to read them. In fact, Watts reports that More told him that More is a 'restricted filer' in *numerous* courts, and has been so-restricted in the Chicago trial courts in the past. (If any reader doubts these claims, please take look at More's filings in the trial court (Exhibit-B3) –or Federal Court (Exhibit-B4), and try to read them without getting a headache. We note that More is a named plaintiff in no less than **forty (40) cases** in the trial court *alone* (Exhibits-B5, B6, and B7) – 25 Civil, 7 Chancery, and 8 Law cases. A Google and/or LexisNexis search should turn up even more such filings.

¶9 Watts clearly documents that his delay in obtaining public records (a *Sine Qua Non* prerequisite of any filing) was not his fault, and that he made diligent efforts to obtain said records. **If we are to deny Mr. Watts' request to allow a Rule 329 Supplement, and therefore allow his filings into the record, but allow Mr. More's scurrilous and verbose 'nonsense filings' to be included in the official record on appeal (which is currently the state of affairs), then this is an absurd result.** As a moral point (yes, morals do count), it is absurd to punish Watts for a fault that is entirely not his. However, we note that Watts' difficulties in obtaining court records on which to base any filings were *The Court's fault alone* –and prevented him from filing. Otherwise, his various filings would have gone into the trial court – and, of course, the record on appeal. So, by law (Rule 329), these omissions constitute “material omissions in the record.” **For that reason alone, we reverse.**

### **Motion for Leave to file an *Amicus Curiae* brief – REDUX**

¶10 We turn back to the *Amicus* issue – not only because it is – in and of itself in an “**absolute** sense” – not very well-understood by the trial court, but – as it applies “**relevant** to Watts' motion” to supplement – legally controlling. We can all agree that if Watts' filings meet the standards for an *Amicus*, they should meet the other, lower, standards, right? Here is the chart

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<sup>2</sup> (*continued from previous page*) adjudicating courts both be impartial regarding the matter before them, basing their decision a decision resting solely on the law and evidence adduced –as well as have “appropriate jurisdiction” to render judgment, and in some cases retained counsel, if desired, **and a statement from the adjudicator of reasons for the decision and evidence relied on.** PDP is violated when a government harms a person without first following the exact course of the law, thus denying their legal rights under the law. **Substantive Due Process (SDP)**, on the other hand, is a well-established case law standard for courts to enforce limits on legislative and executive powers & authority [e.g., failures on the part of “the more politically accountable branches of government.”]. SDP prohibits both Federal and State governments from depriving any person of so-called “unnamed rights” guaranteed under the 9TH AMENDMENT to the U.S. Constitution, such as the right to “life,” “property,” and various other “liberties.”

to clarify:

**Standard #1 – Can be filed in the trial court:** This is the lowest standard, and many a vexatious litigant has succeeded in filing things that are duly scanned in & docketed in the trial courts. (*The 'ministerial duty' of the clerks.*) Mr. More, even though he seems – by Mr. Watts' description (*see Watts' filings*) – to be a legal 'genius' or 'savant' (“*a virtual walking case-law Encyclopædia, a savant on the order of “Rain man,” the famous 1988 movie starring American actor, Dustin Hoffman,*” Page 4 of 6 of Affidavit of Gordon Wayne Watts, filed in the trial court in Chancery), Mr. More's filings are incomprehensible by most objective observers. Yet, he finds his filings appearing on docket anyhow. See, e.g., 'Activity Date: 6/21/2013 INCOMING CORRESPONDANCE FILED' by 'Participant: MOORE ROBERT,' – *in the case-at-bar* – an obvious misspelling of his last name. (Exhibit-B1)

**Standard #2 – Courts grant leave to supplement the record on appeal:** This is an intermediate standard. All that is required here is to show that the filings should have been included in the trial courts – and, for reasons not the filer's fault – were not (see Rule 329).

**Standard #3 – Courts grant leave for an *Amicus Curiae* brief:** The trial court judge clearly lays out the correct standards, referring to *Kinkel v. Cingular Wireless, L.L.C.*, 223 Ill. 2d 1; 857 N.E.2d 250; 306 Ill.Dec. 157 (Jan. 11, 2006), basically stating that an *Amicus* needs to offer helpful information that the parties have overlooked. Illinois Courts also adopt a 7<sup>th</sup> Cir. Federal Court standard in which ((#1)) a party is not represented at all; ((#2)) the 'direct interest' test; **or**, ((#3)) the same test as above: Helpful info overlooked by the parties. NOTE: The 7<sup>th</sup> Circuit test uses the key operator “or,” meaning that any one “or” the other of the three tests need apply. (*Contrary to the trial court's implications, the inclusion of the extra options of the 7<sup>th</sup> Cir. Test make the standard lower and easier, not higher, to meet: one need only meet one 'or' the other test.*)

**Standard #4 – The highest standard:** would the brief be 'determinative' to the outcome of the case (i.e., change the outcome) – and not merely “helpful,” as in #3 above? If 'yes,' then the brief or filing meets the gold standard.

¶11 We now look back at the trial courts findings (Exhibit-A). On the top of page 2, the court admits that: “Mr. Watts' submissions contend, essentially, that the case was decided incorrectly because neither of the two attorneys who represented Mr. Daniggelis during the seven-year litigation raised certain arguments [that] Mr. Watt (sic) believes would have carried the day.” The trial court is correct in how it represents Watts' claims on this head; however, the trial court's recollection of what Watts *actually* filed *initially* and/or assertion of facts is woefully incorrect: Two arguments, at least, raised by Watts [proof of a photocopied signature, Arg.IV.A, and the fact that 2 versions of the POA (Power of Attorney) exist, Arg.IV.G., suggesting it was notarised after the fact] were not – to this panel's review – ever mentioned by any of Daniggelis' attorneys. Unless Shelton had a photocopy machine right handy at the Starbuck's where the signature took place, there is no way a version *without* a notary seal could have made it into the court's record. This fact, added to Daniggelis' claims that Shelton was not present when he signed



on POA, add to the already strong criminal case against Shelton and Younes.

Also, since the trial court found in favour of Younes, this implies that the trial court was alleging that *both* Warranty Deeds were valid. But, since no mere mortal can sign his/her name exactly the same twice in a row, then this means that the latter Warranty Deed was **an obvious photocopy forgery**, thus annulling any claim Younes might have to the subject property, and making Watts' submissions 'determinative' to the outcome of the case. {{In fact, even *without* Watts' legal arguments, we don't see how any reasonable reader could conclude that Daniggelis would just sign away his property to Younes 'for free,' e.g., “give away the farm” and lose **hundreds of thousands** of dollars of equity in the house and property without *any* consideration (payment) whatsoever.}}

Watts, on page 6 of his proposed *Amicus*, states that: 'One does not need to be a “handwriting expert” [to see the obvious forgery on Daniggelis' signature].' Because this may be a sticky point, we write to address this point: If, for example, one was comparing two *different* handwriting samples, and trying to determine whether they were written by the same person, then, yes, a “handwriting expert” would clearly be needed. However, we see two signatures on two (2) different Warranty Deeds, but they are, clearly, identical: obviously the latter one is a photocopy of the former, thus making the latter Warranty Deed null and void *ab initio*.

The attorneys for Daniggelis alleged that the signature was a forgery and offered scant “white-out” arguments, but neither the court itself, *nor attorneys for either side*, addressed the “identical signature” issue Watts raises, and, for that reason alone, we would grant his motion for leave to file as *Amicus Curiae* in the case at bar—*were we to take up the issue*. But today, we merely reverse, in our appellate capacity, the trial court's denial of Watts' Rule 329 motion for leave to supplement the record.

¶12 We note a careful review of Watts' personal websites –in particular, these 2 links:

<http://GordonWatts.com/MortgageFraud-Court-Filings/Mon03Aug2015-FedEx-and-USPS-Tracking/>  
and:

<http://GordonWayneWatts.com/MortgageFraud-Court-Filings/Mon03Aug2015-FedEx-and-USPS-Tracking/>

With respect to these links, it is apparent that Watts is very displeased (and possibly a little frightened) by our court system, and, in response, is trying to “work the media,” not unlike as was done in the *Lessie Towns* case. (And, in his mind, this is justified – because the life or health of his elderly friend –Mr. Daniggelis –is being threatened –through criminally fraudulent means –or at the least, the court and parties are simply “waiting for him to die,” and then take his house/property –as he is quite old.) We doubt that a poor, non-lawyer from out-of-state, such as Watts, can successfully embarrass or harm our courts with 'bad press' (and, for the record, our decisions should **not** be based on public opinion, but rather on the legal *and* moral standards of justice), but, as a 'practical' matter, our jobs are harder when there is the perception (true or false) that we are contributing to the ill health or death (as in making an elderly man homeless by failure to rule against a “mortgage rescue scheme”). For that reason, alone, we must try to be

“honest and just” judges, even in the face of peer pressure to the contrary.

Mr. Watts may be almost as 'annoying' as the infamous Mr. Robert J. More; however, Watts is merely attempting to help this court sort through a notoriously-difficult case. (And help save his friend's life, even at high cost to print and mail copious pleadings with little or no hope of reimbursement.) Must we rebuff a 'Good Samaritan' as we have continued to do up until now? Oh, really?.. Why did we become judges if not to afford justice to the oppressed and weak?

Yet rather than comply with our own court's rules, and apply reason and common sense, the Court *regularly* looks the other way as yet another Trial Court Judge casts aside state laws without making any effort to preserve justice or equity. This acquiescence may well be seen as a signal of the Court's intended resolution to turn a blind eye to justice if the litigant is not “rich and connected.” This is not the proper way to discharge our Article III responsibilities. And, it is indecorous for this Court to pretend that it is.

¶13 It is clear that Watts' submissions should have made it onto the trial court's docket –and, therefore, into the official record on appeal – and lacked *only* due to the trial court's own blatant and continued failure to comply with the applicable **Public Records laws**. This is not an affront or insult to the trial court: This Court is fully aware that the trial court clerks are often short-staffed and yet they do their best to treat every citizen with respect, but sometimes being slack or slow to grant such records requests due to their heavy workload. But failure is failure, and punishing Watts for the court's own failure is inconsistent with This Court's standards of justice: Had Watts been given the records **when** he requested them, his pleadings *en toto* would, no doubt, have found their way into the record on appeal, in a timely fashion – as he is requesting of us today. Watts has rights under Due Process (a means to supplement the record) Equal Protection (is he not as equally-protected as Mr. More – whose filings are indisputably less deserving of inclusion in the record?) – and Redress (the 'forgotten' First Amendment Right). Justice Harriet (dissent at ¶16) is therefore wrong, as a matter of law, when she would deny that Watts' Constitutional Rights were implicated (and, in the instant case, *denied*). Justice Harriet in her dissent at ¶17 disdains the precedent of other courts. And yes, *Stare Decisis* (the practice to 'stand by' past precedent) is not a hard-and-fast rule. But when numerous (in fact, most) courts permit *Amici* to participate on nearly equal ground, are we not depriving ourselves of a “benefit be had” – and “falling behind” our sister courts?

¶14 In fact, Mr. Watts was permitted to participate by a Federal Appeals Court – and, apparently, was the only non-lawyer permitted to proceed *Pro Se* and file *Amici* briefs. (Exhibit-C1.) This in addition to the fact he nearly won as 'next friend' of Terri Schiavo – all by himself. (Exhibit-C2) Contrary to come claims, Watts' filings in the internationally-famous 'Terri Schiavo' case were reviewed on the merits: his request for a rehearing got past the clerk (who would have stricken it had it not met technical requirements) and was reviewed on the merits by the full Florida Supreme Court, eventually denying his request in a 4-3 split decision, which was better than all other parties on the losing side – *combined*. Thus, while Watts is (by his own admission) not a lawyer, the trial court judge's comments (on the bottom of page 2, in the footnote) are an understatement and incorrectly assess the legal potential for Watts' filings to assist this court.

Even assuming *arguendo* that Watts was a “legal dummy,” this would not necessarily mean that he was 'helpless' to help This Court in legal matters – an important fact which our

colleague, Justice Harriet, seems to overlook in her dissent. (Dissent at ¶17) Take, for example, a citizen calling in to an 'Anonymous Tip Line' for the local Police Department (or perhaps the State's attorney general fraud line, which many states have). Suppose, further, that Watts knew of some fact or legal angle that was overlooked. Would you expect the police to say “shut up: you're not a cop” or “you're not a lawyer: what would you know?” – Of course not! The police would check out *any and all* leads – as would the fraud line – and follow-up on it as needed. Are we any less professional *or more proud* than our colleagues in the police and fraud units?

God forbid, and certainly not! But that is what we end up doing when we tell Watts (and countless other prospective *Amici Curiae*) to 'shut up and go away' in response to his providing us with key insight to solve a potentially life-threatening legal mystery.

Lastly, we must address our colleague's dissent respecting the apparent 'mercy killing' of this case: Justice Harriet claims that Daniggelis “would doubtless lose his house anyway.” (Dissent at ¶18) This is factually incorrect: In fact, Watts has stated (*and is formally stating, for the record, in this motion for rehearing*) that he knew of plans for Daniggelis to obtain investors and/or renters, and had some lined up when his dog got sick, and he had to cancel the appointment. Watts' filings clearly lay out how Shelton and Younes 'stepped in' to replace the previous investors, and – had Shelton/Younes not been dishonest – Daniggelis would have likely worked up a deal to save the house. (But, even assuming *arguendo* Daniggelis was negligent and was going to lose the house anyhow, this is not legal grounds to steal it from him: Two wrongs don't make a right, and fraud is still fraud.)

¶15 As an aside, we note that The 'COMPLAINT TO FORECLOSE MORTGAGE' filed on 10/17/2007, by Plaintiff, GMAC MORTGAGE LLC, states, in point 4. of its complaint, that Plaintiff acknowledges the existence of other unknown own interested parties, and hereby includes them in its lawsuit, *naming them as defendants*. Quoting GMAC, they admit as follows:

“4. Plaintiff alleges that in addition to persons designated by name herein and the Unknown Defendants referred to above, there are other persons, and/or non-record claimants who are interested in this action and who have or claim some right, title, interest or lien in, to or upon the real estate, or some part thereof, in this Complaint described, including but not limited to the following:

UNKNOWN OWNERS AND NON RECORD CLAIMANTS, IF ANY.

That the name of each of such persons is unknown to the plaintiff and on diligent inquiry cannot be ascertained, **and all such persons are therefore made party defendants to this action** by name and description of UNKNOWN OWNERS and NON RECORD CLAIMANTS.”

For this reason *alone*, Watts does not need to seek leave to file an *Amicus* brief: he is *already* a named party – a defendant – (should he so desire to exercise this right). **The trial court, therefore, erred in denying him this right of participation.**

For the foregoing reasons, we conclude that the trial court's refusal to grant leave to supplement the record on appeal is unconstitutional as applied to Watts. (The trial court is being petty and nit-picky: Watts' request is not unreasonable or over-burdensome.) We therefore

reverse that portion of the judgment denying leave to supplement the record, we uphold the trial court's refusal to grant leave to file an *Amicus Curiae* brief, and we remand to the lower tribunal for proceedings consistent with this order.

—Judgment affirmed in part, reversed in part, and remanded. **Recommended for publication in the official reports.**

¶16 **HARRIET, J., dissenting.** Mr. Watts asks our court to reverse the trial court's denial of a grant for leave to supplement the record – and to reverse the decision to deny leave to file an *Amicus* brief. For the reasons stated by my colleague in the majority opinion, I concur with the denial of leave for an *Amicus*. But I would uphold the lower court's decision to deny leave to supplement the record, and I write to clarify:

Watts has no “Constitutional rights” (Majority opinion at ¶1, ¶13, and ¶15) to participate in a case in which he is not a named party, much less supplement the record out of time. [That his delay in obtaining records was not his fault is not our concern: perhaps, this litigant should hire a lawyer to “work the [news] media” (Majority opinion at ¶12, par.1) to embarrass us with 'bad press' – and/or be “rich and connected” (Majority opinion at ¶12, last paragraph) – should he desire to more-speedily summon desired records.]

¶17 Moreover, if the attorneys of record feel that they have the case “under control,” then perhaps they do. In sum, the rights to participate in “cases not your own” are *de minimus* and can be ignored at the discretion of the court. That the Supreme Court of the United States (and numerous other courts) regularly entertain *Amici* is of no import to us: we will follow our own legal dictates – and not be swayed by other courts (or public opinion), even if such is great and vocal: Watts is not a lawyer, and thus unqualified and helpless to aid our court.

¶18 Lastly, we are doing Mr. Daniggelis a favour: he is obviously struggling with his mortgage – and would doubtless lose his house anyway. By ruling in favour of Atty. Younes, who began as a co-defendant in this case, we are “putting Daniggelis out of his misery,” an act of mercy.

For those reasons, I would uphold the trials court's decision to deny leave to supplement the record.

**Prayer for relief – of Gordon Wayne Watts: Please rule consistent with the fictitious majority opinion *supra*, and please specifically grant the Rule 329 motion for leave to supplement the record on appeal with all of what was filed by the undersigned, Gordon Wayne Watts.**

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

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above motion and all attached pleadings were delivered to the following parties as indicated – **this Monday, the 30<sup>th</sup> day of November 2015:**

**Clerk of the Circuit Court: CHANCERY DIVISION PH: 312-603-5031 (5133: Chancery / 5116: Civil), Chief Dep Clerk, Cynthia Eddington; Asst Chief Dep Clerk, Gerald Jones  
50 West Washington Street, Room 802, Chicago , IL 60602**

**Hon. Michael F. Otto, Associate, Judge, Chancery, (312) 603-3893 Chancery Div.  
Daley Center, 50 W. Washington St., Room 2804, Chicago, Illinois 60602**

**Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)  
(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)  
Email: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) ; [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com) ;  
134 N. LaSalle St., STE 1810, CHICAGO IL, 60602**

**Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl Assn),  
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305**

**Mr. Robert J. More ([Anselm45@Gmail.com](mailto:Anselm45@Gmail.com))** I represent to the court that Mr. More has consented to email service and prefers this method exclusively.

**Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)  
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ;  
Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com)  
c/o: King Holloway LLC, 101 N. Wacker Dr., STE 2010, Chicago, IL 60606**

I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods.

**Paul L. Shelton, Esq.**

**E-mail: [PMSA136@aol.com](mailto:PMSA136@aol.com); [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net)** As the court has seen fit to deem Shelton a non-party and not in need of service (see comments in the orders in question, and the service list of same), I'm not serving Mr. Shelton a hard copy, just electronic copies.

Joseph Younes Law Offices / <http://ChicagoAccidentAttorney.net>

166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602;

Phone: (312) 372-1122 ; Fax: (312) 372-1408

Email is: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) per <http://www.ZoomInfo.com/p/JosephYounes/599467626>

MERS (Mortgage Electronic Registration Systems, Inc.)

<https://www.mersinc.org/about-us/about-us>

a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: [JanisS@mersinc.org](mailto:JanisS@mersinc.org)

Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email:

[SandraT@mersinc.org](mailto:SandraT@mersinc.org) – Director, Corporate Communications

Note: MERS is only being served electronically per above.

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above motion and all attached pleadings (Motion for Rehearing and the Notice of Motion) were served upon all parties listed above, this 30th day of November, 2015 by the following methods:

- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage. I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

- E-mail: I am contemporaneously serving all the parties listed above via email, in such cases as I have their e-mail address.

- Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra*.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Gordon Wayne Watts, *Amicus Curiae*\*

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880

Web: [www.GordonWatts.com](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)

Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**Date: Monday, 30 November 2015**

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

## INDEX TO THE EXHIBITS

<u>Instrument</u>	<u>Docket/Tab#</u>
<b>Order of This Court, which is being appealed-via <i>Motion for Rehearing</i> (Group 'A')</b>	
10/29/2015 Order of Hon. Michael F. Otto in this case	Exhibit-A
<b>Various filings of Mr. Robert J. More (Group 'B')</b>	
06/21/2013 Docket entry for Mr. Robert J. Moore [sic: 'More'] in <i>this</i> case	Exhibit-B1
04/16/2012 (APR 17 2012) Order of Hon. Eileen O'Neill-Burke, imposing sanctions upon Mr. More in <i>More v. City of Chicago</i> (No.: 2011-M1-12530)	Exhibit-B2
6/1/11 Intentional Tort complaint of Robert J. More – a sample filing in <u>STATE COURT</u> : (case number 2011-M1-013782, <i>More v. Jack</i> )	Exhibit-B3
Mar 03, 2008 Notice of Appeal filed by Robert J. More – a sample filing in <u>FEDERAL COURT</u> : (case number 04-cv-3214, E.D. NY, <i>More v. Monex</i> )	Exhibit-B4
Twenty-Five (25) cases in which Robert J. More has filed as plaintiff in the <u>CIVIL DIVISION</u> of the Cook County, IL trial courts	Exhibit-B5
Seven (7) cases in which Robert J. More has filed as plaintiff in the <u>CHANCERY DIVISION</u> of the Cook County, IL trial courts	Exhibit-B6
Eight (8) cases in which Robert J. More has filed as plaintiff in the <u>LAW DIVISION</u> of the Cook County, IL trial courts	Exhibit-B7
<b>Various orders relating to Mr. Gordon Wayne Watts (Group 'C')</b>	
January 06, 2015 Order of Hon. Beverly B. Martin, Federal Cir. Judge granting Mr. Gordon Wayne Watts' ( <i>Pro Se</i> ) motion for leave to file an amended <i>Amicus Curiae</i> brief and denying Mr. Anthony Clare Citro's ( <i>Pro Se</i> ) motions for leave to file out of time and for leave to file as <i>Amicus Curiae</i>	Exhibit-C1
Comparative case-law holdings w/ citations in the internationally-famous 'Terri Schiavo' case: Mr. Watts ; former Fla. Gov. Jeb Bush ; Schiavo's blood family	Exhibit-C2

Case Information Summary for Case Number  
**2007-CH-29738**

**Exhibit-A**

Filing Date: 10/17/2007  
Case Type: District First Municipal  
Division: Chancery  
Addendum: Calendar 61  
\$0.00

Party Information

Plaintiff(s)  
GMAC MORTGAGE LLC

Attorney(s)  
PIERCE & ASSOCIATES

Attorney: GALIC ANDJEKO

Activity Date: 8/21/2015

Participant: BANK AMERICA N A

NOTICE OF MOTION FILED

Attorney: GALIC ANDJEKO

Activity Date: 10/29/2015

Participant: UNKNOWNWATTS GORDON

MOTION TO - DENIED -

Judge: OTTO, MICHAEL F.

Date and Time Properties

Date & Time: November 2015

Time Zone: Internet Time

10/29/2015 Order of Hon. Michael F. Otto in this case

10/29/2015 Order of Hon. Michael F. Otto in this case \* Exhibit-A



**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION  
MORTGAGE FORECLOSURE/MECHANICS LIEN SECTION**

U. S. BANK, N.A., *etc.*,

Plaintiff,

vs

JOSEPH YOUNES, RICHARD DANIGGELIS,  
*et al.*,

Defendants.

Case No. 07 CH 29738

1720 N Sedgwick Ave.  
Chicago, IL

**ORDER**

The Court is in receipt of two copies of an October 2, 2015 letter from Mr. Gordon Wayne Watts to the undersigned, purporting to relate to the above captioned case. Mr. Watts's letter includes several enclosures: an Affidavit; two Notices of Motion; a Motion for leave to file *Amicus Curiae* brief; a Motion for leave to file Supplemental Record; a document captioned "Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi* –Emergency Fashion by OVERNIGHT FedEx"; and several proposed orders. (All capitalization and emphasis as in original.) All of the above are attached to this Order as Group Exhibit A.<sup>1</sup>

In his letter (a copy of which Mr. Watts certifies he sent to all parties to the case and several non-parties), Mr. Watts contends that he filed all of the enclosures with the Clerk of the Circuit Court but that his "motion was docketed but not ruled on" and thus there was a due process violation of some nature. Mr. Watts states that although he is not an attorney ("a non-lawyer"), and although he "know[s] that This Court has probably lost 'subject matter' jurisdiction on the merits of the case," he wishes to submit the enclosures on behalf of Richard Daniggelis, defendant in the case.

For the reasons stated below, Mr. Watts's submissions are struck and/or denied in their entirety.

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<sup>1</sup> The Court has made no annotations or alterations to the documents other than to place the "Received" stamp on the first copy of Mr. Watts's letter. All handwritten notes/annotations/comments on the documents were present when the documents were received.

## Background

Mr. Watts's submissions contend, essentially, that the case was decided incorrectly because neither of the two attorneys who represented Mr. Daniggelis during the seven-year litigation raised certain arguments Mr. Watt believes would have carried the day. Motions by a total stranger to the case to supplement the record and to file an *amicus curiae* brief are simply not the correct way to make such arguments in Illinois courts.<sup>2</sup>

**Motion to Supplement.** Mr. Watts cites no authority, nor has the court's own research uncovered any, which would permit a stranger to the case to supplement the record. The motion is properly denied for that reason alone. Moreover, Mr. Watts provides no explanation of how the supplement is relevant to any issue in the case. The proposed supplement (attached as Exhibits A-G to the "Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi* – Emergency Fashion by OVERNIGHT FedEx," not attached to the motion to supplement) consists of two purported proofs of service on this court (Exs. A, B); two "zoom views" of partial excerpts of the court docket in this and another case (Exs. C, D); and three pictures represented to be of the property at issue and a City of Chicago stop work order posted thereon (Exs. E, F, G). Mr. Watts fails to explain what possible relevance any of these materials would have to any issue pending before this court, the appellate court, or any court.

**Motion for Leave to File *Amicus Curiae* Brief.** Mr. Watts's status as a non-party non-attorney is not fatal to the motion for leave to file *amicus curiae* brief, as *amicus* briefs are by definition submitted by non-parties to the case. Nevertheless the motion is denied. In a 2006 order denying a similar motion, the Illinois Supreme Court delineated the considerations relevant to a motion for leave to file *amicus curiae* brief. *See Kinkel v. Cingular Wireless, L.L.C.*, 2006 Ill. LEXIS 1 (Jan. 11, 2006). First is the substance of the proposed brief: will that brief assist the court in disposing of the case *sub judice* by "provid[ing] it with ideas, arguments, or insights helpful to resolution of the case that were not addressed by the litigants themselves." *Id.* at \*2. Second, regardless of whether the brief passes that threshold test, the Court cited with approval the Seventh Circuit's rule that an *amicus* brief should normally be permitted:

only (1) when a party is not competently represented or not represented at all, or (2) when the would-be *amicus* has a direct interest in another case, and the case in which he seeks permission to file an *amicus curiae* brief may, by operation of *stare decisis* or *res judicata*, materially affect that interest; or (3) when the *amicus* has a unique perspective, or information, that can assist the court beyond the help that the lawyers for parties are able to provide.

*Id.* at \*4. Mr. Watts's motion fails both aspects of *Kinkel*.

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<sup>2</sup> The court acknowledges, but is unpersuaded by, Mr. Watts's claims that he achieved some partial success when he took part in the Terry Schiavo matter. (*See, e.g.*, Affidavit of Gordon Wayne Watts ¶¶3-4 and Motion for leave to file *Amicus Curiae* brief p. 2.)

First, Mr. Watts's brief is not and cannot be of any assistance to this court because the case is not before this court. The matter is, rather, currently before the appellate court, as Mr. Watts recognizes in his letter when he admits that this court has lost jurisdiction of the case.

Even if not for this fatal defect, Mr. Watts's brief fails the Seventh Circuit's three-part test as well. (1) Mr. Daniggelis is not only represented by counsel, he has been doggedly represented before this court by two different attorneys who have filed voluminous motions and pleadings on his behalf and kept this case at issue for several years. Mr. Watts' hindsight contention that other arguments could perhaps have been raised does not in any way establish that Mr. Daniggelis is not competently represented. (2) Mr. Watts does not claim to be a party to any case the outcome of which could be determined by the outcome of this case.<sup>3</sup> (3) Mr. Watts does not claim any unique perspective or information. He is not an attorney; he claims no special expertise in mortgage foreclosure law or procedure nor even Illinois law generally. Mr. Watts claims simply to be a friend of Mr. Daniggelis who thinks Mr. Daniggelis's attorneys should have made other arguments than they did.

### CONCLUSION

This Court sees no reason to allow Mr. Watts to inject himself into this case as he seeks to do. Mr. Watts's motions are denied and his affidavit and "Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi* – Emergency Fashion by OVERNIGHT FedEx" are struck. Court staff will send a copy of this Order (with attachments) to Mr. Watts and all parties to this case (U.S. Bank, Joseph Younes, and Richard Daniggelis, all care of counsel) on the date it is entered. Court staff will not transmit a copy of the order to any non-parties other than Mr. Watts.

ENTER:



Michael F. Otto #2065

Associate Judge

---

<sup>3</sup> Mr. Watts does represent in the "Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi* – Emergency Fashion by OVERNIGHT FedEx" that Mr. Daniggelis "promised, if he was able, to give me [Mr. Watts] an unspecified amount of assistance for the advancement of certain shared causes and beliefs." Whatever is meant by that statement, it does not suggest that this case will materially affect any *case* to which Mr. Watts is a party, which is the relevant test.

This order was sent to the following on the above stamped date:

Mr. Andjelko Galic, Esq. 134 N. LaSalle Street, Suite 1810 Chicago, IL 60602	Mr. Peter King, Esq. King Holloway LLC 101 North Wacker Drive, Suite 2010 Chicago, IL 60606
Mr. Richard Indyke, Esq. 221 N. LaSalle Street, Suite 1200 Chicago, IL 60601	Mr. Gordon Wayne Watts 821 Alicia Road Lakeland, FL 33801-2113

**06/21/2013 Docket entry for Mr. Robert J. Moore [sic: 'More'] in this case Exhibit-B1**

Case Information Summary for Case Number  
**2007-CH-29738**

Filing Date: 10/17/2007  
Case Type:  
Division: Chancery  
District: First Municipal  
Ad Damnum: \$0.00  
Calendar: 61

November 2015

S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

7:35:43

Current time zone: Eastern Standard Time

OK Cancel

Party Information

Plaintiff(s)

GMAC MORTGAGE LLC

Attorney(s)

PIERCE & ASSOCIATES

https://w3.courtlink.lexisnexis.com/cookcounty/Finddock.asp?DocketKey=CAAH0CH0CJHD10CH

(847) 239-7555

LEGATEES

MOORE ROBERT J

MORTGAGE ELECTRONIC REGIST

KROPIK PAPUGA AND SHAW

https://w3.cou...AH0CH0CJHD10CH

https://w3.courtlink.lexisnexis.com/cookcounty/Finddock.asp?DocketKey=CAAH0CH0CJHD10CH

Activity Date: 6/21/2013

Participant: MOORE ROBERT

INCOMING CORRESPONDENCE FILED

Attorney: PRO SE

Activity Date: 6/26/2013

Participant: GMAC MORTGAGE LLC

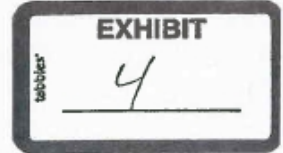
AFFIDAVIT FOR MAILING FILED

Attorney: PIERCE & ASSOCIATES

Order

(2/24/05) CCG 0

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS



Robert More, et al

v.

City of Chicago, et al

No. 11 M1 12520

ORDER

This cause coming to be heard on ~~status~~ & City of Chicago's Motion for Rule 219(c) Sanctions against the Plaintiff  
IT IS HEREBY ORDERED:

- (1) Defendants motion for Sanctions is granted
- (2) Plaintiff, Robert More, is ordered to pay the City of Chicago \$300.00 made payable to the City of Chicago by valid personal, cashier's, or bank check within 7 days.
- (3) Plaintiff is barred from filing any pleading, motion, or other paper with this Court until the terms of this Sanction order have been complied with in full.

Atty. No.: 90909

Name: Todd M. Hill

ENTERED:

Atty. for: City of Chicago

Dated: APR 17 2012

Address: 30 N. LaSalle #800

City/State/Zip: Chicago, IL 60602

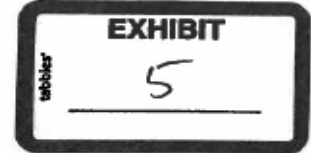
Judge: Circuit Court Judge's No.

Telephone: (312) 744-7150

04/16/2012 (APR 17 2012) Order of Hon. Eileen O'Neill-Burke, imposing sanctions upon Mr. More in *More v. City of Chicago* (2011-M1-12530) Exhibit-B2 (Part 2: City letter)



CITY OF CHICAGO  
DEPARTMENT OF LAW  
TORTS DIVISION



April 16, 2012

VIA EMAIL: [Anselm45@gmail.com](mailto:Anselm45@gmail.com); and  
VIA UNITED STATES MAIL

Mr. Robert More  
P.O. Box 6926  
Chicago, IL 60680

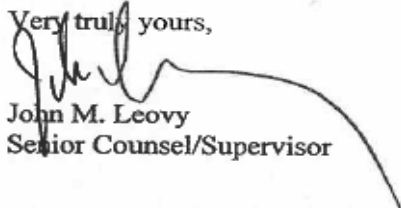
Re: *More v. Chicago, et al.*  
11 M1 12530

Dear Mr. More,

Attached hereto please find a copy of the order entered in this case today.

Demand is hereby made to you for full payment of the sum of \$300.00 United States Dollars on or before April 23, 2012. You may make your check payable to the City of Chicago and tender it c/o John M. Leovy, City of Chicago Department of Law, Torts Division, 30 N. LaSalle, Suite 800, Chicago, IL 60602. If I do not receive the check by April 23, 2012, the City may institute enforcement proceedings.

Very truly yours,

  
John M. Leovy  
Senior Counsel/Supervisor

6/1/11 Intentional Tort complaint of Robert J. More – a sample filing  
in STATE COURT: (case number 2011-M1-013782, *More v. Jack*)

Exhibit-B3

www.thirstforjustice.net (rjackcom6-1-11) 6/1/11 -10:00 – 14:50 - compose

Document List of 6/1/11

1. D/L of 6/1/11 (rjackdl6-1-11) X
2. Il Sup. Ct. R. 298 Petition (rjack6-1-11) X
3. Complaint of 6/1/11 X
4. Jury Demand Form (rjackjdf)
5. Summons (rjack)
6. Disbursement Schedule of the Damages Sought in Complaint -Reimbursements, Draws, Rebates, Bounties, Sponsorships &/or Scholarships

20111013782  
CALENDAR/ROOM 1112  
TIME 09:30  
Tort - Intentional

All entries adjacent to which is included an X herein were included in the documents filed on 6/1/11 re the matters this conveyance concerns and remitted to accomplish service of process on such date.

www.thirstforjustice.net (rjack6-1-11)

Add Damnum - \$1,650.00 – R. Jack, \$5,000.00 - CCSA  
Jury Trial Demand Included Herein

IN THE CIRCUIT COURT OF COOK COUNTY, IL  
FIRST MUNICIPAL DIVISION

Robert More, Estate of Robert J. More, ISMA Campaign to Make the World Safe for Innocence Once Again, Estate of Robert J. More, Co-plaintiffs, Elizabeth, Luke, Henry, Vincent, Blaise, Lonigro – Assignee Plaintiffs

v  
Circuit Court Case No.  
Robert Jack, Office of the Cook County, IL, State's Attorney ("CCSA") Representative John Doe, CCSA, City of Chicago, IL Police Department (all individual Defendants named herein are sued in their official and individual capacities & all Municipal Government Entities named herein are sued as Monell v Dept. of Social Services of the City of New York, Defendants)

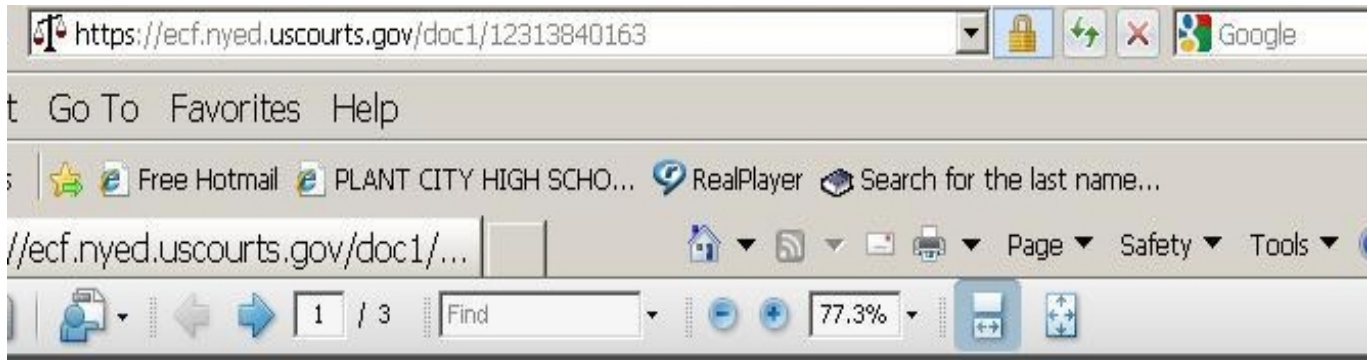
Initial Component of Complaint of 6/1/11 to be Superseded by 7/15/11

Introduction:

His Omnipotence, Christus Rex still not having returned to conclusively avenge the countless predation perpetrations, crimes and atrocities by which He has permitted Himself to continue to be so egregiously offended – including those referenced herein, the Chair of Peter/the Holy See/the Apostolic See (Matt, 16:18) still remaining vacant, RJM still not having procured the type of individual reprieve of the type collectively referenced in Matt. 24:20, which RJM has continued to so unabatedly seek - notwithstanding that the non-provision whereof may in fact be because either RJM still does not possess sanctifying grace, or the fact that he has for all practical purposes been permanently abandoned by God, which is evidently the condition of the vast majority of the members of the society in which this Complaint is being filed, the members of the Committee of 300 still not having been disgorged of the estimated 1000 trillion dollars they have so wrongly and indeed murderously, taken from the world's goyim, the control of the money supply of the u.s. of A. not yet having been returned to the Constitution of the u.s. A.'s Art. 1 Section 8, Cl 5 requirement, the safeguards of the non-counterfeit version of the Rule of Law not yet having been recovered, the members of the Committee of 300 and their murderous mercenaries not yet having been punished for the predations perpetrated by them, martial Law still not having been imposed on a nationwide scale 27 years after the establishment of Readiness Exercise 84 ("REX 84"), the Federal Government and its political subdivisions in this Country, still not yet having been abolished notwithstanding the enormous net detriment to all legitimate interests which it is RJM's informed understanding results from the activity whereof (notwithstanding the considerable efforts RJM has continued to make to contribute to the accomplishment of such objective(s)), the ISMA still not having issued RJM any dispensation from its general requirement that no nihil obstat will be issued for the contra-predatory vigilante retribution administration rectification of a given predation perpetration unless and until a given petitioner wherefore would have demonstrated that procurement of consideration the issuance of any nihil obstat would effect could not have been procured via the access to systems and methods which are supposed to be available for such according to the plain language meaning of the Constitution of the u.s. of A. and all legitimate laws emanating wherefrom, and RJM still not having procured any "declaration of the unconstitutionality as applied of the provisions of the criminal code of the State of IL", RJM did not see that he was left with any choice except to file this complaint at the comparatively enormous burden imposed upon RJM's exercise of natural law rights – which he understands that he lacks the authority to leave unutilized for the purpose of his continuing endeavor to bear that share of the burden referenced in Matt. 11:30 which he has to bear in order to fulfill the purpose for which he was created. This complaint is being filed according to the priorities, points of reference and criteria according to which all complaints filed



**Mar 03, 2008 Notice of Appeal filed by Robert J. More – a sample filing in  
FEDERAL COURT: (case number 04-cv-3214, E.D. NY, *More v. Monex*) Exhibit-B4**



Case 1:04-cv-03214-LRP-USA Document 85 Filed 03/03/08 Page 1 of 3

United States District Court  
For The  
Eastern District of New York

**FILED**  
BY CLERK'S OFFICE  
U.S. DISTRICT COURT, E.D.N.Y.

File Number 04-cv-3214

Assignee from Assignor, and Plaintiff for Third Party Plaintiff – Thomas A. More, Robert J. More, et al – Plaintiff  
V

★ MAR 03 2008 ★  
**BROOKLYN OFFICE**

Monex Inc., Estate Of Terrence Kirby, Donald Paren, Federal Recovery Group Incorporated ("FRGI"), Mark  
Bienstock – Representatives of the Reign of Terror  
Et Al, Defendant(s)

Plaintiff RJM's Conditional Verified Motion to Proceed Informa Pauperis, and Financial Affidavit In Support of  
Motion to Proceed In Forma Pauperis of 2/27/08

Now comes the Assignee-Plaintiff, Robert J. More ("RJM"), to conditionally move this Court to grant leave for RJM  
to proceed in any appeal which might ever have to be prosecuted in regard to the case this document concerns ("this  
case") on an *Informa Pauperis* basis, and to appoint an attorney if it possesses the authority to do so, in any appeal  
that might ever have to be prosecuted in regard thereto, if this Court would not grant whatever relief would have to be  
granted at this juncture and/or in the future in order that no appeal would have to be prosecuted in this case, and in  
explanation and support whereof, RJM avers and explains as follows:

1. Hopefully, no appeal will ever have to be filed in this case, as it is hoped that either the grace of God will move  
Judge Dearie to simply vacate the order he so categorically unjustifiably entered in this case on 1/22/08,  
preferably before he receives any other document in which a petition for such type relief would be sought, less  
preferably - after he would receive the balance of what will constitute a motion to reconsider/motion for various  
forms of relief with all accompanying exhibits should he not vacate his own order of 1/22/08, or less preferably  
still - after he would receive a copy of the documents RJM is in the process of completing which name him as a  
respondent and/or defendant.

**Twenty-Five (25) cases in which Robert J. More has filed as plaintiff  
in the CIVIL DIVISION of the Cook County, IL trial courts**

**Exhibit-B5**

*Division: Civil*  
**Click on Case Number for Case Information Summary**

Name Search Results for: ROBERT MORE

<b>Case Number</b>	<b>Plaintiff</b>	<b>Defendant</b>	<b>Date Filed</b>
<a href="#">2013-M1-011772</a>	MORE ROBERT J	NORTHSHORE LOGISTI	04/01/2013
<a href="#">2012-M1-017562</a>	MORE ROBERT J	UNITED STATES POST	12/28/2012
<a href="#">2012-M1-012163</a>	MORE ROBERT J	R DALEY CENTER SER	04/19/2012
<a href="#">2011-M1-018391</a>	MORE ROBERT J	UNITED SATES POSTA	12/19/2011
<a href="#">2011-M1-016934</a>	MORE ROBERT J	UNITED STATE MARSH	10/17/2011
<a href="#">2011-M1-013782</a>	MORE ROBERT	JACK ROBERT	06/01/2011
<a href="#">2011-M1-012530</a>	MORE ROBERT	CITY CHICAGO	04/12/2011
<a href="#">2011-M1-011143</a>	MORE ROBERT J	AKAL SECURITY SERV	02/17/2011
<a href="#">2010-M1-016562</a>	MORE ROBERT J	AKAL SECURITY SERV	08/09/2010
<a href="#">2010-M1-015265</a>	MORE ROBERT J	STATE OF IL POLICE	06/23/2010
<a href="#">2009-M1-014425</a>	MORE ROBERT J	ILL STATE POLICE	05/26/2009
<a href="#">2008-M1-143321</a>	MORE ROBERT J	NORTHSHORE LOGISTI	05/27/2008
<a href="#">2007-M1-017559</a>	MORE ROBERT J	UNITED STATES MARS	08/24/2007
<a href="#">2007-M1-012482</a>	MORE ROBERT J	FEDERAL BUREAU INV	03/28/2007
<a href="#">2006-M1-303232</a>	MORE ROBERT	SILVA JESSICA	08/21/2006
<a href="#">2006-M1-301847</a>	MORE ROBERT J	SHAHZAD AHMED	05/10/2006
<a href="#">2005-M1-011153</a>	MORE ROBERT J	MARTIN DOUGLASS	02/01/2005
<a href="#">2003-M4-000202</a>	MORE ROBERT J	LUGO GUADALUPE	01/29/2003
<a href="#">2003-M4-000202</a>	MORE ROBERT J	LUGO GUADALUPE	01/29/2003
<a href="#">2001-M1-021407</a>	MORE ROBERT J	EMERALD TRUCKING	10/15/2001
<a href="#">2001-M1-019929</a>	MORE ROBERT J	CENTRAL DRIVERS EX	09/10/2001
<a href="#">2001-M1-016370</a>	MORE ROBERT J	LABOR LEASING INC	06/12/2001
<a href="#">2001-M1-107063</a>	MORE ROBERT J	J B HUNT TRANSPORT	02/09/2001
<a href="#">2000-M1-115726</a>	MORE ROBERT J	NORTHSHORE LOGISTI	03/31/2000
<a href="#">1997-M1-147284</a>	MORE ROBERT J	ROADWAY EXPRESS	09/02/1997

**Seven (7) cases in which Robert J. More has filed as plaintiff in the CHANCERY DIVISION of the Cook County, IL trial courts**

**Exhibit-B6**



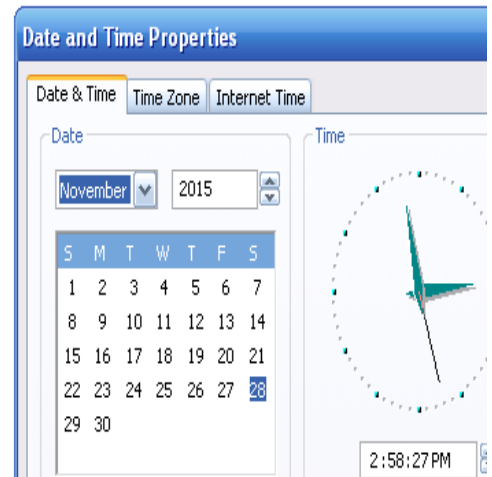
*Division: Chancery*

**Click on Case Number for Case Information Summary**

Name Search Results for: ROBERT MORE

<u>Case Number</u>	<u>Plaintiff</u>	<u>Defendant</u>	<u>Date Filed</u>
<a href="#">2011-CH-12339</a>	MORE	GRIFFITH CCSD	03/31/2011
<a href="#">2010-CH-26622</a>	MORE ROBERT	BARRETT JAMES	06/21/2010
<a href="#">2009-CH-18934</a>	MORE ROBERT	COOK COUNTY IL SHERIFF DEP	06/12/2009
<a href="#">2008-CH-41425</a>	MORE ROBERT J	MACLEOD WILLIAM	11/03/2008
<a href="#">2008-CH-09977</a>	MORE ROBERT J	BLANC CHARLES L	03/17/2008
<a href="#">2008-CH-09978</a>	MORE ROBERT J	OBAMA SENATE CAMPAIGN	03/17/2008
<a href="#">2006-CH-09267</a>	MORE ROBERT	COOK COUNTY SHERIFF MICHA	05/09/2006

[Start a New Search](#)



**Eight (8) cases in which Robert J. More has filed as plaintiff  
in the LAW DIVISION of the Cook County, IL trial courts**

**Exhibit-B7**



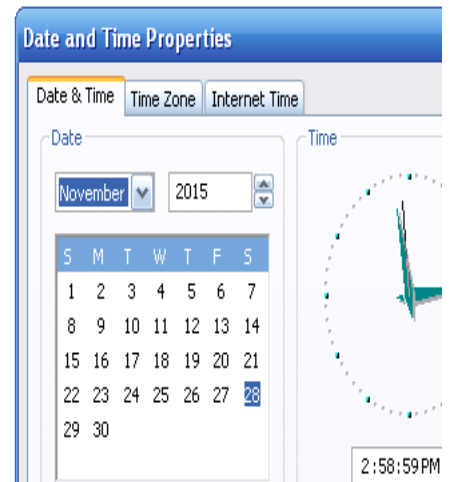
*Division: Law*

Click on Case Number for Case Information Summary

Name Search Results for: ROBERT MORE

<u>Case Number</u>	<u>Plaintiff</u>	<u>Defendant</u>	<u>Date Filed</u>
<a href="#">2006-L-005796</a>	MORE ROBERT J	LABLANC CHARLES	06/02/2006
<a href="#">2006-L-001453</a>	MORE ROBERT J	OBAMA SENATE CAMPAIGN	02/08/2006
<a href="#">2004-L-007670</a>	MORE ROBERT J	QUERRY HARROW LAW FIRM	07/08/2004
<a href="#">2001-L-009012</a>	MORE ROBERT J	FRANCZEK SULLIVAN LAW FIR	07/30/2001
<a href="#">2000-L-008511</a>	MORE ROBERT	RL CARRIERS	07/26/2000
<a href="#">2000-L-050227</a>	MORE ROBERT J	ILLINOIS DEPT EMPLOY SECU	03/10/2000
<a href="#">1999-L-012721</a>	MORE ROBERT J	TRANSPORTATION TECH INC	11/10/1999
<a href="#">1999-L-050384</a>	MORE ROBERT J	JB HUNT TRANSPORT	05/03/1999

[Start a New Search](#)



January 06, 2015 Order of Hon. Beverly B. Martin, Federal Cir. Judge granting Mr. Gordon Wayne Watts' (*Pro Se*) motion for leave to file an amended *Amicus Curiae* brief and denying Mr. Anthony Clare Citro's (*Pro Se*) motions for leave to file out of time and for leave to file as *Amicus Curiae* Exhibit-C1

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 2

IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT

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No. 14-14061-AA

---

JAMES DOMER BRENNER, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

---

No. 14-14066-AA

---

SLOAN GRIMSLEY, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

---

Appeals from the United States District Court  
for the Northern District of Florida

---

**Exhibit-C1 (continued from above)**

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Case: 14-14061 Date Filed: 01/06/2015 Page: 2 of 2

ORDER:

Clare Anthony Citro's motions for leave to file out of time and for leave to file a brief as *amicus curiae* are DENIED.

Gordon Wayne Watts's motion for leave to file an amended *amicus curiae* brief is GRANTED.

  
UNITED STATES CIRCUIT JUDGE

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 1

**UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

ELBERT PARR TUTTLE COURT OF APPEALS BUILDING  
56 Forsyth Street, N.W.  
Atlanta, Georgia 30303

John Ley  
Clerk of Court

For rules and forms visit  
[www.ca11.uscourts.gov](http://www.ca11.uscourts.gov)

January 06, 2015

Anthony Citro  
254 SW 7TH ST  
DANIA, FL 33004-3948

Gordon Wayne Watts  
821 ALICIA RD  
LAKELAND, FL 33801-2113

Appeal Number: 14-14061-AA ; 14-14066 -AA  
Case Style: James Brenner, et al v. John Armstrong, et al  
District Court Docket No: 4:14-cv-00107-RH-CAS

**This Court requires all counsel to file documents electronically using the Electronic Case Files ("ECF") system, unless exempted for good cause.**

The enclosed order has been ENTERED.

Sincerely,

JOHN LEY, Clerk of Court

Reply to: David L. Thomas, AA/rvg  
Phone #: (404) 335-6169

MOT-2 Notice of Court Action

**Comparative case-law holdings w/ citations in the internationally-famous 'Terri Schiavo' case: Mr. Watts ; former Fla. Gov. Jeb Bush ; Schiavo's blood family Exhibit-C2**

[1] *In Re: GORDON WAYNE WATTS (as next friend of THERESA MARIE 'TERRI' SCHIAVO)*, No. SC03-2420 (Fla. Feb.23, 2005), denied 4-3 on rehearing. (Watts got 42.7% of his panel)  
<http://www.floridasupremecourt.org/clerk/dispositions/2005/2/03-2420reh.pdf>

[2] *In Re: JEB BUSH, GOVERNOR OF FLORIDA, ET AL. v. MICHAEL SCHIAVO. GUARDIAN: THERESA SCHIAVO*, No. SC04-925 (Fla. Oct.21, 2004), denied 7-0 on rehearing. (Bush got 0.0% of his panel before the same court)  
<http://www.floridasupremecourt.org/clerk/dispositions/2004/10/04-925reh.pdf>

[3] *Schiavo ex rel. Schindler v. Schiavo ex rel. Schiavo*, 403 F.3d 1223, 2005 WL 648897 (11th Cir. Mar.23, 2005), denied 2-1 on appeal. (Terri Schiavo's own blood family only got 33.3% of their panel on the Federal Appeals level)  
<http://media.ca11.uscourts.gov/opinions/pub/files/200511556.pdf>