



## E-Notice

**2007-CH-29738**

CALENDAR: W

To: Gordon Wayne Watts  
gww1210@gmail.com

---

# NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

**GMAC MORTGAGE LLC v. YOUNES JOSEPH**  
**2007-CH-29738**

The transmission was received on 01/08/2018 at 8:58 PM and was ACCEPTED with the Clerk of the Circuit Court of Cook County on 01/09/2018 at 8:46 AM.

**NOTICE OF APPEAL (Notice of Appeal as of right. See doc; I shall attempt also to include - as an exhibit - my Docketing Statement and Notice of Appearance in the higher court.)**

**EXHIBITS (This Docketing Statement / Appearance is my sole extra exhibit not included in my Notice of Appeal. Please note that I filed it timely via the mailbox rule. ~Gordon Wayne Watts, Defendant-Appellant)**

Filer's Email: gww1210@gmail.com  
Filer's Fax:  
Notice Date: 1/9/2018 8:46:22 AM  
Total Pages: 27

**DOROTHY BROWN**  
**CLERK OF THE CIRCUIT COURT**  
COOK COUNTY  
RICHARD J. DALEY CENTER, ROOM 1001  
CHICAGO, IL 60602

(312) 603-5031  
courtclerk@cookcountycourt.com

**APPEAL TO THE ILLINOIS DISTRICT (APPELLATE) COURT, FIRST DISTRICT  
FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION, First Municipal District, Calendar "W"**

GMAC Mortgage, LLC n/k/a: Bank of America, )  
N.A., aka: "LaSalle Bank National Association, )  
aka: "US Nank, NA," as trustee for Morgan ) **Circuit Court Case No.: 2007-CH-29738**  
Stanley Loan Trust 2006-16AX, **Plaintiff,** ) { **Transfer into Law Div. from Chancery** }  
)  
**vs.** ) Trial Judge: Hon. Diane M. Shelley (#1925)  
) Date of Notice of Appeal: January 08, 2018  
Richard B. Daniggelis, Gordon Wayne Watts, ) Date of Judgment: December 07, 2017  
Joseph Younes, Mortgage Electronic Registration ) Date of Post-judgment Motion: None  
Systems (MERS), Paul L. Shelton, Erika R. Rhone, ) Order: #5  
STEWART TITLE ILLINOIS, John P. LaRocque, )  
Robert J. More, LEGATEES, NON-RECORD ) Supreme Court Rule(s) which confer(s)  
CLAIMANTS, UNKNOWN, HEIRS, ) jurisdiction upon the reviewing court:  
UNKNOWN OWNERS, et. al., **Defendants.** ) **Ill.Sup.Ct. R.301, 303**

**NOTICE OF APPEAL**

**Defendant-Appellant, Gordon Wayne Watts, pro se, hereby gives notice, pursuant to Supreme Court Rule 301, that he appeals to the Appellate Court of Illinois for the First District from the order of December 07, 2017, entered in this matter in the Circuit Court of Cook County, Illinois, which ordered the following: (#1) Granting Daniggelis' motion to reconsider, thereby reversing the July 10, 2017 order; (#2) Granting Daniggelis' motion for non-suit aka Voluntary Dismissal with leave to refile; and, (#3) Vacating the 07/10/2017 judgment in favour of Shelton, thereby reinstating Shelton as a defendant. By this appeal, Defendant-Appellant hereby seeks/prays for Summary Judgment in favour of Daniggelis, giving him back his house & land, with costs assessed for pain & suffering ; damages to his house by Joseph Younes (as further described in *City of Chicago v. 1720 Sedgwick, Younes, et. al., 2017-M1-400775*, a Code Violation case in the Civil Division of Cook County, IL trial courts) ; monies lost due to having to find another place to live and/or store belongings ; award for attorneys fees to his attorney, **Andjelko Galic**, –and award for monetary losses to **Watts** and **More**, who suffered various losses as a result of financial distress inflicted upon **Daniggelis** –such ruling which would **moor Daniggelis'** otherwise valid request to the trial court, which precipitated the rulings in question, and with remand to the Circuit Court for further proceedings consistent with this order.**

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

Respectfully submitted,  
/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawyer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113, PH: (863)688-9880 [home] or (863)409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**Page 1 of 15 (08 January 2018, Watts "Notice of Appeal" in 07-CH-29738)**

GMAC v Daniggelis, Watts, Younes, et al., 2007-CH-29738 (Notice of Appeal)

**APPEAL TO THE ILLINOIS DISTRICT (APPELLATE) COURT, FIRST DISTRICT  
FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION, First Municipal District, Calendar "W"**

GMAC Mortgage, LLC n/k/a: Bank of America, )  
N.A., aka: "LaSalle Bank National Association, )  
aka: "US Nank, NA," as trustee for Morgan )  
Stanley Loan Trust 2006-16AX, ) **Circuit Court Case No.: 2007-CH-29738**  
**Plaintiff,** ) **{ Transfer into Law Div. from Chancery }**  
vs. )  
) Trial Judge: Hon. Diane M. Shelley (#1925)  
Richard B. Daniggelis, Gordon Wayne Watts, ) Date of Notice of Appeal: January 08, 2018  
Joseph Younes, Mortgage Electronic Registration ) Date of Judgment: December 07, 2017  
Systems (MERS), Paul L. Shelton, Erika R. Rhone, ) Date of Post-judgment Motion: None  
STEWART TITLE ILLINOIS, John P. LaRocque, ) Order: #5  
Robert J. More, LEGATEES, NON-RECORD )  
CLAIMANTS, UNKNOWN, HEIRS, ) Supreme Court Rule which confers  
UNKNOWN OWNERS, et. al., ) jurisdiction upon the reviewing court:  
**Defendants.** ) **Ill.Sup.Ct. R.301, 303**

**NOTICE OF FILING**

To: See attached Service List

**PLEASE TAKE NOTICE** that today, Monday, 08 January 2018, I am causing to be filed with the **Civil Appeals Division** of the CIRCUIT COURT OF COOK COUNTY, ILLINOIS, my **Notice of Appeal**, this **Notice of Filing**, an **Updated and Corrected "Service List"** of parties, my **Request for Preparation of the Record on Appeal**, my **"Application for Waiver of Court Fees,"** and attached **Exhibits**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
(Actual Signature, if served upon clerk) /s/ Gordon Wayne Watts  
**Gordon Wayne Watts** (Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**GMAC v Daniggelis, Watts, Younes, et al., 2007-CH-29738 (Notice of Appeal)**

**SERVICE LIST**

- \* **CIVIL APPEALS DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 801 Chicago, IL 60602 – (312) 603-5406, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays
- \* **Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602
- \* **Hon. James P. Flannery, Jr.**, Cir. Judge–Presiding Judge, Law Division [re: “Application for Waiver of Court Fees”] 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343
- \* **Law Division and Hon. Diane M. Shelley, Circuit Judge, served by email / electronic service only, as a courtesy, since this is an appeal:** [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov)
- \* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis 773-327-7198 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652
- \* **Unknown Owners/NonRecord Claimants** 1720 North Sedgwick St., Chicago, IL 60614-5722
- \* **Andjelko Galic** (Atty#:33013) Cell:312-217-5433, Fax:312-986-1810, Phone:312-986-1510 845 Sherwood Road, LaGrange Park, IL 60526-1547 (**Please take note of Mr. Galic's new address**) Email: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) ; [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com)
- \* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE** ROBERT”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812
- \* **COHON RAIZES@AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**  
Attn: Carrie A. Dolan, 208 S LASALLE#1860, CHICAGO IL, 60604 [ph:(312) 726-2252]
- \* **MERS** (Mortgage Electronic Registration Systems, Inc.) <https://www.mersinc.org/about-us/about-us> a nominee for HLB Mortgage; Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@mersinc.org](mailto:SandraT@mersinc.org) Dir, Corporate Communications, 1595 Springhill road, Suite 310, Vienna, VA 22182  
**(703) 761-0694 / (800)-646-6377**

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 3 of 15

GMAC v Daniggelis, Watts, Younes, et al., 2007-CH-29738 (Notice of Appeal)

SERVICE LIST (continued from above)

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

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

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

\* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

\* **Richard Indyke, Esq.** Atty. No. 20584, (312-332-2828 Atty for LaSalle Bank Natl. Assn.),  
Email: [RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

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

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

<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com)

or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

\* **John P. LaRocque**, 2 Orchard Place, Hinsdale, IL 60521 [Last known address]

\* **Paul L. Shelton**, (630) 993-9999, (630) 333-4009, (630) 286-5100, / Direct: (630) 842-0126

(Atty. #15323, disbarred per IARDC) E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net)

<http://www.il-reab.com/agents/26812-paul-l-shelton-shelton-associates-hinsdale-il-60523>

c/o: Shelton Law Group, LLC, <https://www.youtube.com/user/PaulSheltonLawGroup>

1010 Jorie Blvd. #144, Oak Brook, IL 60523

\* **Paul L. Shelton, Pro Se**, 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351

\* **Paul L. Shelton** [PH: 630-986-5555], 10 North Adams Street, Hinsdale, IL 60521

\* **Erika R. Rhone** 9948 South Normal, Chicago, IL 60628-1229

\* **Erika R. Rhone** [ph:(773) 788-3711], 22711 Southbrook Dr., Sauk Village, IL 60411-4291

\* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>

312-635-5716, per website 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

Phone: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408. Email: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com)

GMAC v Daniggelis, Watts, Younes, et al., 2007-CH-29738 (Notice of Appeal)

**APPEAL TO THE ILLINOIS DISTRICT (APPELLATE) COURT, FIRST DISTRICT  
FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION, First Municipal District, Calendar "W"**

GMAC Mortgage, LLC n/k/a: Bank of America,	)	
N.A., aka: "LaSalle Bank National Association,	)	
aka: "US Nank, NA," as trustee for Morgan	)	
Stanley Loan Trust 2006-16AX,	)	<b>Circuit Court Case No.: 2007-CH-29738</b>
<b>Plaintiff,</b>	)	<b>{ Transfer into Law Div. from Chancery }</b>
<b>vs.</b>	)	
	)	Trial Judge: Hon. Diane M. Shelley (#1925)
Richard B. Daniggelis, Gordon Wayne Watts,	)	Date of Notice of Appeal: January 08, 2018
Joseph Younes, Mortgage Electronic Registration	)	Date of Judgment: December 07, 2017
Systems (MERS), Paul L. Shelton, Erika R. Rhone,	)	Date of Post-judgment Motion: None
STEWART TITLE ILLINOIS, John P. LaRocque,	)	Order: #5
Robert J. More, LEGATEES, NON-RECORD	)	
CLAIMANTS, UNKNOWN, HEIRS,	)	Supreme Court Rule which confers
UNKNOWN OWNERS, et. al.,	)	jurisdiction upon the reviewing court:
<b>Defendants.</b>	)	<b>Ill.Sup.Ct. R.301, 303</b>

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

\* The undersigned **Defendant-Appellant, Gordon Wayne Watts**, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Notice of Appeal**, this **Notice of Filing**, an **Updated and Corrected "Service List"** of parties, my **Request for Preparation of the Record on Appeal**, my **"Application for Waiver of Court Fees,"** and attached **Exhibits (which are attached hereto and which include the order being appealed)** are being served upon the parties listed in the attached Service List, above – this Monday, 08 January 2018, via the Cook County, IL Electronic Filing system if they're e-file registered, and if I can access it for this Notice of Appeal.

\* I am concurrently serving all parties via First Class U.S. Postal Mail and/or FedEx 3rd-party commercial carrier (whichever proves more convenient).

\* Additionally, I shall, when practically possible, post a TRUE COPY of this filing –and related filings –online at my official websites, supra –linked at the "Mortgage Fraud" story, dated Fri. 14 April 2017.

\* Lastly, I may, later, cc all parties via e-mail, if I am able. ***Respectfully submitted,***

_____	<u>/s/ Gordon Wayne Watts</u>
(Actual Signature, if served upon clerk)	(Electronic Signature)
<b>Gordon Wayne Watts</b>	<b>Gordon Wayne Watts</b>

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113, PH: (863)688-9880 [home] or (863)409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**Page 5 of 15 (08 January 2018, Watts "Notice of Appeal" in 07-CH-29738)**

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 5 of 15

**GMAC v Daniggelis, Watts, Younes, et al., 2007-CH-29738 (Notice of Appeal)**

**INDEX TO THE EXHIBITS**

**Instrument Docket/Tab#**

ORDER OF THE COURT, dated <b>December 07, 2017</b> <b>on which this appeal is based (1 page)</b>	Exhibit-A
<b>Request for Preparation of the Record on Appeal (1 page)</b>	Exhibit-B
Application for Waiver of Court Fees ( <b>4 pages</b> )	Exhibit-C
Letter to Judge Flannery ( <b>1 page</b> )	Exhibit-D
Prior Waiver denial before I was a party to the case ( <b>1 page</b> )	Exhibit-E
Documentation that I'm currently on Food Stamps	Exhibit-F

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 6 of 15

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC  
 v. Plaintiff  
Joseph Younis et al  
Defendants

No. 07CH29738

ORDER

This matter coming before this court on Richard Daniggelis' Motion to Reconsider the order entered on 7-10-2017 and the court being advised on this matter IT IS HEREBY ORDERED

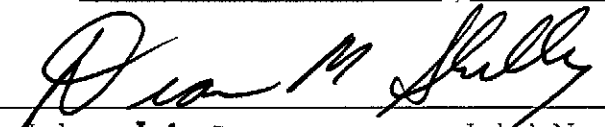
ELECTRONICALLY FILED  
 1/8/2018 8:58 PM  
 2007-CH-29738  
 PAGE 7 of 15

1. Richard Daniggelis's motion to Reconsider is granted and the order <sup>4285</sup> entered on July 10, 2017 is rescinded.

2. Richard Daniggelis's motion for Voluntary Dismissal is granted. <sup>4040</sup>

Attorney No.: 33013  
 Name: ANDRZEJ STARC  
 Atty. for: Richard Daniggelis  
 Address: 845 Sherwood Road  
 City/State/Zip: La Grange Park, IL 60526  
 Telephone: 312 217 5433

3. The judgment entered in favor of <sup>4902</sup> Paul Shelton is vacated.  
 ENTERED: Paul Shelton

Dated: \_\_\_\_\_  
  
 Judge Judge Diane M. Shelley Judge's No. \_\_\_\_\_

DEC 07 2017

Circuit Court - 1925



APPEAL TO THE APPELLATE COURT OF ILLINOIS FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, LAW DIVISION, First Municipal District, Calendar "W"

GMAC, et. al., Plaintiffs / Appellees Plaintiff/Appell

Daniggelis, Watts, v.

Younes, et. al., Defendants / Appellants

Reviewing Court No.

Circuit Court No. 2007 - CH - 29738

Honorable Diane M. Shelley, Circuit Judge Trial Judge

Date Notice of Appeal Filed Monday, 08 January 2018

REQUEST FOR PREPARATION OF RECORD ON APPEAL

Attorney (or Party if no attorney):

Name: Mr. Gordon Wayne Watts Cook County Attorney Code No. 99500 or Pro Se 99500 Address: 821 Alicia Road, City: Lakeland State: Florida Zip: 33801-2113 Telephone Number: H: 863-688-9880 / C: 863-409-2109

Attorney for: Pro Se E-mail Address (optional) Gww1210@aol.com / Gww1210@Gmail.com GordonWatts.com GordonWayneWatts.com

NOTICE IS HEREBY GIVEN to the Clerk of the Circuit Court of Cook County that Mr. Gordon Wayne Watts requests the preparation of the Record on Appeal in the above case.

DESIGNATION OF RECORD

The Clerk of the Circuit Court of Cook County shall prepare the Record on Appeal in accordance with Illinois Supreme Court Rule 321. The record shall include the common law record, which consists of trial documents filed and judgments and orders entered by the trial court and:

All documentary exhibits entered at trial, except for those other exhibits that cannot ordinarily be included for review and are subject to motion.

Reports of Proceedings prepared in accordance with Illinois Supreme Court Rule 323.

Certificate in Lieu of Record on Appeal pursuant to Illinois Supreme Court Rule 325.

Documents filed under seal on the following dates and unsealed:

A copy of the trial court Order authorizing these documents to be unsealed for the purpose of inclusion in the Record on Appeal is attached hereto or will be provided by the Appellant to the Civil Appeals Division at least 30 days in advance of the date on which the Record on Appeal is scheduled to be transmitted to the Appellate Court. Upon return of the Record on Appeal to the Circuit Court, it is the responsibility of the parties to obtain an Order resealing these records, if the records are to be resealed.

Documents filed under seal on the following dates, which are to remain sealed:

Please note that, pursuant to Rule 17 of Appellate Court of Illinois, "No record, exhibit, or brief may be filed under seal in the Appellate Court, unless Appellate Court has first given leave for filing under seal, notwithstanding that the material was filed under seal in the Circuit Court."

FEES

Payment may be made by Cash, Check or Money Order. Cash payments accepted for in-person payments only. Checks or money order should be made to Clerk of the Circuit Court of Cook County. Pursuant to 705 ILCS 105/27.2a(k) and 27.2(k), the Clerk of the Circuit Court of Cook County must charge fees for Records on Appeal in advance as follows:

100 pages or less, \$110

100 - 200 pages, \$185

Each page in excess of 200, \$.30/page

Reduced fee for Local Governments and School Districts, \$50

All prescribed fees are due in advance of transmission of the Record on Appeal. It is understood and agreed that once a request for preparation of a Record on Appeal is made by submission of this form, the Appellant is responsible for the costs of preparing the Record on Appeal, regardless of whether the Appeal is successful, dismissed, the time is extended, or a party elects to not transmit the Record on Appeal to the Appellate Court. The Clerk of the Circuit Court of Cook County reserves the right to pursue a claim to recover the costs and expenses, including reasonable attorneys' fees, related to preparation of the Record on Appeal.

Mr. Gordon Wayne Watts

(Type or print name)

(Signature of Appellant or Appellant's Attorney)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

MONDAY, 08 January 2018

ELECTRONICALLY FILED 1/8/2018 8:58 PM 2007-CH-29738 PAGE 8 of 1

STATE OF ILLINOIS, CIRCUIT COURT <u>Cook</u> COUNTY		APPLICATION FOR WAIVER OF COURT FEES	For Court Use Only
<b>Instructions</b> ▼			
Enter above the county name where the case was filed.		GMAC Mortgage, LLC	
Enter the name of the person who started the lawsuit as Plaintiff/Petitioner.		aka "U.S. Bank, NA," etc..	
Enter the name of the person being sued as Defendant/Respondent.		v. Richard B. Damigelli, Gordon Wayne Watts, Joseph Yarnes, Paul L. Shelton, et. al.,	
Enter the Case Number given by the Circuit Clerk or leave this blank if you do not have one.		2007-CH-29738 LAW Division (Transfer from Chancery)	
		Case Number	
		Plaintiff / Petitioner (First, middle, last name)	
		Defendant / Respondent (First, middle, last name)	

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 9 of 15

In 1a, enter your full name. If you are completing this form on behalf of a minor or an incompetent adult, provide that person's information.

In 1b, only enter the year you were born. DO NOT enter your entire date of birth.

In 1c, enter your complete current address.

In 2a, enter the number of people age 18 and older living in your house who you support. Support means that the people rely on you financially.

In 2b, enter the number of people under age 18 living in your house who you support.

In 3, check "Yes" if you have received at least 1 of the benefits listed in the past 4 weeks.

If you check "Yes" in 3, skip 4 and sign the form.

Pursuant to Illinois Supreme Court Rule 298 and 735 ILCS 5/5-105, I state:

1. I am providing the following information about myself:

- a. Name: Gordon Wayne Watts  
First Middle Last
- b. Year of Birth: 1966
- c. Street Address: 821 Aticia Road  
 City, State, ZIP: LAKELAND, Florida 33801-2113
- d. I believe I cannot afford to pay the court fees in this case.

2. I am providing the following information about people who live with me:

- a. I support 0 adults (not counting myself) who live with me.
- b. I support 0 children under 18 who live with me.

3. I have received 1 or more of the benefits listed below in the past 4 weeks:

- Yes  No
- Supplemental Security Income (SSI) (Not Social Security)
  - Aid to the Aged, Blind and Disabled (AABD)
  - Temporary Assistance to Needy Families (TANF)
  - State Children & Family Assistance
  - Food Stamps (SNAP) ← Yes - See attached documentation
  - General Assistance (GA)
  - Transitional Assistance

**\*\*If you answered "Yes" in section 3, skip section 4 and sign the form.\*\***

from  
Cherrey)

4. I checked "No" in section 3, so I am providing the following financial information:

In 4a, check "Yes" if you have applied for at least 1 of the benefits listed in section 3.

a. I have applied for 1 or more of the benefits listed in section 3:

Yes  No

In 4b, check the box for each type of money you have received in the past month. Also enter the gross (before taxes) amount for each type.

b. I receive the following money each month. This includes money received by people I

support who live with me. (check all that apply)

My employment: \$ \_\_\_\_\_  Other people's employment: \$ \_\_\_\_\_

Child support: \$ \_\_\_\_\_  Social Security (not SSI): \$ \_\_\_\_\_

Pension: \$ \_\_\_\_\_  Unemployment: \$ \_\_\_\_\_

Other (list type and amount): \_\_\_\_\_ \$ \_\_\_\_\_

No income

Total of all money received: \$ \_\_\_\_\_

Include the money received by the people you support who live with you. Support means that the people rely on you financially.

c. I received the following total amount of money in the past 12 months. This includes money

received by people I support who live with me. (check all that apply)

My employment: \$ \_\_\_\_\_  Other people's employment: \$ \_\_\_\_\_

Child support: \$ \_\_\_\_\_  Social Security (not SSI): \$ \_\_\_\_\_

Pension: \$ \_\_\_\_\_  Unemployment: \$ \_\_\_\_\_

Other (list type and amount): \_\_\_\_\_ \$ \_\_\_\_\_

No income

Total of all money received: \$ \_\_\_\_\_

In 4c, check the box for each type of money you have received in the past 12 months. For each type, enter the total amount received in the past 12 months before taxes.

Include the money received by the people you support who live with you.

d. My current monthly expenses are listed below. This includes the monthly expenses of the

people I support who live with me. (check all that apply)

Rent: \$ \_\_\_\_\_ per month

Home Mortgage: \$ \_\_\_\_\_ per month

Other Mortgage: \$ \_\_\_\_\_ per month

Utilities: \$ \_\_\_\_\_ per month

Food: \$ \_\_\_\_\_ per month

Medical: \$ \_\_\_\_\_ per month

Car Loan: \$ \_\_\_\_\_ per month

Other (list type and amount): \_\_\_\_\_ \$ \_\_\_\_\_ per month

I have no expenses

Total of all expenses: \$ \_\_\_\_\_

In 4d, check all of your expenses for the past month and list the monthly amounts.

Include the expenses of the people you support who live with you.

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 10 of 15

Enter the Case Number given by the Circuit Clerk: 2007-CH-29738

2007-CH-29738 LAW Division (Transfer from Chancery)

In 4e, check all of the items owned by you and list the value of each item. Include the items owned by the people you support who live with you.  
  
If you own real estate, include the total you owe on any mortgage.

- e. I have the belongings listed below. This includes the belongings of the people I support who live with me. (check all that apply)
- Bank accounts and cash totaling: \$ \_\_\_\_\_
  - Home real estate, worth: \$ \_\_\_\_\_  
The total I owe on my home mortgage is: \$ \_\_\_\_\_
  - Other real estate, not including the house I live in, worth: \$ \_\_\_\_\_  
The total I owe on my other mortgage is: \$ \_\_\_\_\_
  - 1<sup>st</sup> vehicle worth: \$ \_\_\_\_\_ The 1<sup>st</sup> vehicle is paid off:  Yes  No
  - 2<sup>nd</sup> vehicle worth: \$ \_\_\_\_\_ The 2<sup>nd</sup> vehicle is paid off:  Yes  No
  - Other (list items and value): \_\_\_\_\_ \$ \_\_\_\_\_
  - None of the above

I certify that everything above is true and correct to the best of my knowledge.  
I understand that making a false statement in this form could be perjury.

*Gordon Wayne Watts* 821 Alicia Road  
Your Signature Street Address

Gordon Wayne Watts LAKELAND FL 33801-2113  
Print Your Current Name City, State, ZIP

N/A (863) 688-9888 (Home)  
Relationship to Minor or Incompetent Adult (if applicable) Telephone

(863) 409-2109 (Cell)

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

The person who filled out this form must sign it.

Enter the complete current address and telephone number of the person who filled out this form.

If you are filling out this form for a minor or an incompetent adult, state your relationship.

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 11 of 15

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

\_\_\_\_\_  
 Plaintiff/Petitioner

v.

\_\_\_\_\_  
 Defendant/Respondent

No. \_\_\_\_\_

Calendar \_\_\_\_\_

**ORDER**

This matter coming before the Court on an Application and Affidavit to Sue or Defend as an Indigent Person, the Court being fully advised in the premises, **IT IS HEREBY ORDERED;**

Pursuant to Supreme Court Rule 298 and 735 ILCS 5/5-105:

The applicant is permitted to sue or defend without payment of fees, costs or charges. Fees for the reproduction of any documents contained in the court file or the electronic docket are not waived without specific order of court. The applicant may be ordered to pay any portion of the waived fees or costs out of a settlement or judgment resulting from this action.

The application is denied for the following reason(s): \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Payment shall be:  made by \_\_\_\_\_ (date) OR  deferred until \_\_\_\_\_ (date) OR  other \_\_\_\_\_

ENTERED:

Dated: \_\_\_\_\_

Judge

Judge's No.

Payment should be made by cash, money order or cashier's check, directly to the Clerk of the Circuit Court of Cook County at the courthouse where you filed your application.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ELECTRONICALLY FILED  
 1/8/2018 8:58 PM  
 2007-CH-29738  
 PAGE 12 of 15

**GMAC v Daniggelis, Watts, Younes, et al., 2007-CH-29738 (Notice of Appeal)**  
**Letter to Judge Flannery (1 page) Exhibit-D**

*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](mailto:Gww1210@aol.com) / [Gww1210@Gmail.com](mailto:Gww1210@Gmail.com)  
Web: [www.GordonWatts.com](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)

**Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division  
50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343

Re: “Waiver of Court Fees” confusion in this case

Monday, 08 January 2018

Dear Judge Flannery:

It has come to my attention that there's confusion regarding my application for fee waiver. As you were the presiding judge who adjudicated my last application, it's instructive to revisit the issue: As you recall, I was a prospective *Amicus Curiae* aka a “Friend of the Court,” and you denied my application on grounds that I wasn't a party. As much as I disagree, I admit this is a “gray” area of case law, & any review of it would be “*de novo*.” As such, there's a good argument that you were right in your order (dated Feb. 22, 2016, in the underlying Chancery case, which was transferred to the Law Division) denying me fee waiver.

However, when speaking by phone with Pat O'Brian, deputy chief of Civil Appeals, she assured me that your denial of my application last time means that I must be denied now. Since Ms. O'Brian is very intelligent (knowledgeable of Supreme Court rules, much more-so than her staff, I must say), if she can get confused, judges can also—after all, judges are human too. While you might've been right to deny me last time, things have changed. I asserted intervention (see my *Motion to Intervene*, dated Thursday, 06 July 2017), an absolute right under IL case law: Where intervention as of right is asserted, “the trial court’s jurisdiction is limited to determining **timeliness**, **inadequacy of representation** and **sufficiency of interest**; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted.” *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984). I satisfy all 3 requirements, giving me a right to intervene under 735 ILCS 5/2-408(a)(3). As there was no denial of my motion, the docket's official listing of me as a defendant is *prima facie* evidence that I'm now a party, and thus qualify for fee waiver to sue or defend. Let me remind you Rule 10-100(a) (Illinois Supreme Court Commission on Access to Justice) states: “The Illinois Supreme Court Commission on Access to Justice is established to promote, facilitate, and enhance equal access to justice with an emphasis on access to the Illinois civil courts and administrative agencies for all people, **particularly the poor and vulnerable**,” which, of course, would include myself. Should the Law Division vacate the order I'm appealing before my appeal is docketed, & grant summary judgment as I've asked, this would 'moot' my appeal, saving the courts a lot of headache, I think. Unless the court awards me for my various losses, which I documented in my Intervention Motion, I will have sufficiency of interest, and thus qualify to Intervene—and obtain fee waiver. This is IL case law; you may check to verify, but you must comply.

**With kind Regards, I am, Sincerely,**

---

**Gordon Wayne Watts**

GMAC v Daniggelis, Watts, Younes, et al., 2007-CH-29738 (Notice of Appeal)

Prior Waiver denial before I was a party to the case (1 page)

Exhibit-E

Order to Sue or Defend as an Indigent Person

CCG N689 C-30M-6/27/07

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC MORTGAGE, LLC et al.

Plaintiff/Petitioner

No. 07 CH 29738

ATM JOSEPH YOUNES, ESQ; Mr. RICHARD B. DANIGGELIS, et al.

Defendant/Respondent

Calendar

ORDER

This matter coming before the Court on an Application and Affidavit to Sue or Defend as an Indigent Person, the Court being fully advised in the premises, IT IS HEREBY ORDERED;

Pursuant to Supreme Court Rule 298 and 735 ILCS 5/5-105:

- The applicant is permitted to sue or defend without payment of fees, costs or charges. Fees for the reproduction of any documents contained in the court file or the electronic docket are not waived without specific order of court. The applicant may be ordered to pay any portion of the waived fees or costs out of a settlement or judgment resulting from this action.
- The application is denied for the following reason(s): PETITIONER LACKS STANDING TO BRING SUIT ON BEHALF OF ANOTHER.

Payment shall be:  made by \_\_\_\_\_ (date) OR  deferred until \_\_\_\_\_ (date) OR  other \_\_\_\_\_

ENTERED:

JUDGE JAMES P. FLANNERY

Dated: February 22, 2016

FEB 22 2016

Circuit Court-1505

*[Signature]*  
Judge Judge's No

Payment should be made by cash, money order or cashier's check, directly to the Clerk of the Circuit Court of Cook County at the courthouse where you filed your application.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ORIGINAL - COURT FILE

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 14 of 15

**GMAC v Daniggelis, Watts, Younes, et al., 2007-CH-29738 (Notice of Appeal)**

**Documentation that I'm currently on Food Stamps**

**Exhibit-F**



Menu Food Assistance Details x +

← → ↻ dcf-access.dcf.state.fl.us/access/benefitDetails.do

www.youtube.com/us gww1210f gww1210g support.microsoft.com www.microsoft.com/se gw00dani gw00dani

**if you are currently receiving regular food assistance benefits you are not eligible for D-SNAP (Food for Florida). Do not apply online or go to the site locations. If you try to apply for D-SNAP, you will be denied because you already receive food assistance benefits from SNAP.**

- Regular food assistance recipients who live in the 48 counties approved for D-SNAP will have their household allotment increased to the maximum for September and October. The increase will bring them up to the total amount they would have received from D-SNAP, and will be credited to their EBT cards.
- The supplement is automatic. You do not have to do anything.
- The supplement will not be labeled in your MyACCESS Account.

### Food Assistance Details

**Case Information**

<b>Case Number</b>	1165166518	<b>Head of the Household</b>	GORDON W. WATTS
--------------------	------------	------------------------------	-----------------

**Food Assistance Details**

Group No	Payee	Begin Date	End Date	Status	Monthly Amount	Benefit Month	Date Benefit Available	History	Information
01	GORDON W. WATTS	01/01/2018	01/31/2018	OPEN	178			<a href="#">click here</a>	<a href="#">click here</a>
01	GORDON W. WATTS	12/01/2017	12/31/2017	OPEN	178	December, 2017	12/05/2017	<a href="#">click here</a>	<a href="#">click here</a>
01	GORDON W. WATTS	11/01/2017	11/30/2017	OPEN	179	November, 2017	11/05/2017	<a href="#">click here</a>	<a href="#">click here</a>

Thursday, November 30, 2017

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 15 of 15



In the Appellate Court of Illinois, First District

Docket Number: \_\_\_\_\_

GMAC Mortgage, LLC n/k/a: Bank ) Appeal from the Circuit Court of Cook  
of America, N.A., aka: "LaSalle ) County, Illinois, County Department,  
Bank National Association," aka: ) Law Division  
"US Bank, NA," as trustee for )  
Morgan Stanley Loan )  
Trust 2006-16AX, ) Circuit Court Case No.: 2007-CH-29738  
**Plaintiff,** ) (Transfer into Law Division from Chancery)  
)  
**vs.** ) Trial Judge: Hon. Diane M. Shelley (#1925)  
Richard B. Daniggelis, ) Date of Notice of Appeal: Monday, 08 January 2018  
Gordon Wayne Watts, Josph ) Date of Judgment: December 07, 2017  
Younes, Paul L. Shelton, Erika R. ) Date of Post-judgment Motion: None  
Rhone, LEGATEES, NON-RECORD ) Order: #5  
CLAIMANTS, UNKNOWN HEIRS ) Supreme Court Rule which confers  
UNKNOWN OWNERS, et. al., ) jurisdiction upon the reviewing court:  
**Defendants.** ) Ill.Sup.Ct. R.301, 303

---

**Docketing Statement and Notice of Appearance of Counsel for Appellant**  
(Civil)

**Appellant-Defendant, Gordon Wayne Watts, acting solely in his capacity *pro se*, and pursuant to Supreme Court Rule 312, submits the following for his Docketing Statement in this appeal. Pursuant to Illinois Appellate Court, First District, local court Rule 9 this Docketing statement shall also serve as the appearance of the undersigned as counsel, *pro se*, for the Appellant.**

**1. Is this a cross-appeal, separate appeal, joining in a prior appeal, or related to another appeal which is currently pending or which has been disposed of by this court?**

**YES**

If so, state the docket number(s) of the other appeal(s):

NO. 1-14-2751 (Trial Court No.: 2007-CH-29738) **GMAC v. Daniggelis**

and:

NO. 1-15-0662 (Trial Court No.: 2014-M1-701473) **Younes v. Daniggelis**

As this court recalls, Daniggelis was the victim of documented mortgage fraud, as outlined in **GMAC**, a Chancery case which was appealed to this court; however, this court never reached the merits, chiefly because Atty. Andjelko Galic, the attorney for Richard Daniggelis, was negligent

and never filed his merits brief, and was chewed out royally by this court in its last substantive order. This court was permitted – but not required – to accept my *Amicus Curiae* (aka: “Friend of the Court”) briefs, and, while this court did not break any laws in rejecting my *amicus* briefs in these appeals, above, it was an unwise use of judicial time, since *amici* are permitted to be a “friend” to the court –and aide its appellate jurisdiction when, as in this case, counsel for both sides overlook stuff and/or are negligent.

**2. If any party is a corporation or association, identify any affiliate, subsidiary, or parent group: NO**

**3. Full name and complete address of appellant(s) filing this statement:**

Gordon Wayne Watts, *pro se*  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**4. Full name and complete address of appellee(s): (Use additional page for multiple appellees.)**

See the attached Service List, which includes all known parties – and their attorneys.

**Counsel on Appeal for appellee(s): (Use additional page for multiple appellees.)**

See the attached Service List, which includes all known parties – and their attorneys.

**5. Court reporting personnel: (If more space is needed, use other side.)**

As I became a “party proper” to this case after its inception (and not merely a prospective *Amicus Curiae*, as I had initially sought), I do not rightly know, but I can tell you that I have heard a report from Mr. Daniggelis, who is my friend, has told me that Andjelko Galic, his attorney, has hired a court reporter and has purchased records. If you want to know about any court reporting personnel, you may ask the attorneys involved in this case and/or the Civil Appeals Division of the trial court below.

**Approximate Duration of trial court proceedings to be transcribed: Unknown: See above**

**Can this appeal be accelerated?** Yes—on motion of the court or any party. While not mandatory (e.g., as in domestic or child rearing issues), the victim of this mortgage fraud is elderly, I'm guessing about 79 or 80 years old, as I speak, and it would not serve the appellate

jurisdiction of this court were it to purposely let all the elderly victims die of old age before the merits of this case could be reached. Therefore, this court would have my gratitude if it could fast track the case, review it on the merits (based solely on what I filed, which should be enough to justify summary judgment), and then render summary judgment in favour of **Daniggelis**, giving him back his house & land, with costs assessed for pain & suffering ; damages to his house by **Joseph Younes** (as further described in *City of Chicago v. 1720 Sedgwick, Younes, et. al., 2017-M1-400775*, a Code Violation case in the Civil Division of Cook County, IL trial courts) ; monies lost due to having to find another place to live and/or store belongings ; award for attorneys fees to his attorney, **Andjelko Galic**, –and award for monetary losses to **Watts** and **More**, who suffered various losses as a result of financial distress inflicted upon **Daniggelis** – such ruling which would **moot Daniggelis'** otherwise valid 'non-suit' motion to the trial court, which precipitated this appeal to this court, **and with remand to the Circuit Court for further proceedings consistent with this order.**

**6. Is this appeal from a final order in a matter involving child custody or allocation of parental responsibility pursuant to Illinois Supreme Court Rule 311(a) which requires Mandatory Accelerated Disposition of Child Custody or Allocation of Parental Responsibilities Appeals? NO**

\*If yes, this docketing statement, briefs and all other notices, motions and pleadings filed by any party shall include the following statement in bold type on the top of the front page: THIS APPEAL INVOLVES A MATTER SUBJECT TO EXPEDITED DISPOSITION UNDER RULE 311(a).

**7.(A) State the supreme court rule, or the law, which confers jurisdiction upon the reviewing court;**

Ill.Sup.Ct. Rule 301 and 303 confer jurisdiction as of right for this appeal. While I was previously a prospective *amicus*, when previously filing in this court, I asserted intervention in the Law Division case, and, as my name appears on docket, in the court below, this is proof of my status as a party, the court below having neither denied my motion nor given any reason to deny intervention as of right. *City of Chicago v. John Hancock Mutual Life Ins. Co., 127 Ill.App.3d 140, 144 (1st Dist. 1984)*. I satisfy all 3 requirements, giving me a right to intervene under 735 ILCS 5/2-408(a)(3). Also, as I'm a food stamp recipient, I qualify for a few waiver in this court & the court below.

**7.(B) State the facts of the case, which bring it within this rule or other law; and, the date that the order being appealed was entered:**

The order being appealed was on December 07, 2017. I have 30 days AFTER the entry of the order, per Rule 303(a)(1). Also, 5 ILCS 70/1.11 confirms that “The time within which any act provided by law is to be done shall be computed by excluding the first day...” and also does not count weekends, meaning that the 30<sup>th</sup> day, which was January 06, 2018, and fell on a Saturday, rolls over to today, Monday, 08 January 2018, making my appeal timely.

**7.(C) State any other facts which are necessary to demonstrate that the appeal is timely:**

Rule 373 allows the time-stamp of the post office or a 3rd-party carrier, such as UPS or FedEx, to count as the time of filing.

**8. Nature of the Case:**

<i>Administrative Review</i>	<b><u>Contract</u></b>	<i>Estates</i>	<i>Personal Injury</i>
<i>Juvenile</i>	<i>Domestic Relations</i>		<i>Child Custody or Support</i>
<i>Product Liability</i>	<b><u>Forcible Entry Detainer (FED)</u></b>		<b><u>Tort</u></b>
<b><u>Mortgage Fraud / Foreclosure</u></b>			

**9. Briefly describe the nature of the case, and the result in the trial court, and set forth any reasons for an expedited schedule:**

First off, my *Amicus Curiae* briefs, as you vividly recall, DOCUMENTED beyond any reasonable doubt, that there was indeed a photocopy forgery, a felony forgery fraud, and this, combined with lack of consideration (payment), especially in light of the fact that known mortgage fraud artist, Paul Shelton aided Younes, gave damning proof of mortgage fraud.

Before I go any further, let me remind you that the victim is elderly, and this, alone, is reasons enough for an expedited schedule, phone conferencing for myself (as I'm in Florida), and a summary Judgment, speedily rendering justice.

However, since I last filed in your court, I discovered the most unusual thing in all of mankind's history: Judge Michael F. Otto, the judge who forcibly stripped Daniggelis' house from him, entered an order dated March 08, 2013, in which he basically admitted fraud, and made my case stronger. Direct link for convenience (but check with trial court to verify)

<http://GordonWatts.com/MortgageFraudCourtDocs/3-8-2013-MOTION-DENIED.pdf>

or:

<http://GordonWayneWatts.com/MortgageFraudCourtDocs/3-8-2013-MOTION-DENIED.pdf>

1. Judge Otto admits (Order, p.4) that the July 9, 2006 warranty deed "is in most respects identical" to the May 9, 2006 warranty deed that Daniggelis signed (except, of course, for the word 'July' being hand-written in), which supports Daniggelis claims that there was a photocopy forgery of his signature (which would void the entire illegal transfer of title).

2. Judge Otto (Order, p.3) acknowledges (admits) that 'Exhibit L' existed, a side-agreement to limit the title transfer only for the purpose of paying the "mortgage arrearage." Judge Otto claims that this document was not properly signed, but apparently, Otto did not see the exhibits filed in Daniggelis' July 30, 2008 answer (see pages 38 and 40 of the 96-page PDF file of a public records request at this link, provided by my personal repository and online docket: <http://GordonWayneWatts.com/MortgageFraudCourtDocs/07ch29738-07242015.pdf> or <http://GordonWatts.com/MortgageFraudCourtDocs/07ch29738-07242015.pdf> where both Shelton and Rhone sign on to such statements, and Daniggelis also signs them: These contracts

place limits on both the time and purpose of the POA). So, this conclusively proves the POA to be fraudulently used. If the reader of this document can not access my website, please see contact the trial court for official records here.

3. There is no material disagreement with the assertion that Richard Daniggelis never got paid, which is a key proof of fraud that is being alleged by multiple parties. (Daniggelis would not simply give away the farm, for free. Moreover, even had he done so, Watts' case law shows that a sale is void ab initio if it lacks consideration.) My filings have repeatedly accused the other parties of failing to pay Daniggelis any consideration, and no one has contested this claim. Per 735 ILCS 5/15-1506(a), that which the other parties to this case don't deny is admitted, and, as such, it is plain that Daniggelis did not get paid for his house, which is documented to have had hundreds of thousands of dollars equity, and which equity (and house and land) were taken without any consideration (payment), thus voiding any purported sale.

4. On page 7 of Judge Otto's ORDER, he claims that the 'difficulty' for Daniggelis is that, even assuming the signature to be altered (forged by photocopy), Otto claims that Daniggelis “provides no factual or legal basis support for his assertion that, assuming the signature to have been altered, the Bank therefore “knew or should have known that the deed ... was no longer valid when the closing occurred.” **This argument by Judge Otto is totally ridiculous:**

Let's say, for example, that a group of thieves steal Daniggelis' **vehicle**, and then sell it on the Black Market to a Bank (or take a loan out on it, using as collateral for a mortgage). When the police finally catch the thieves, do you really think, for one second, that the Bank will be allowed to keep the hot (stolen) property, simply because they did not have “notice” that the property was stolen? Certainly not, and may God forbid! **If Otto's logic seems crazy when we use a stolen vehicle, then it's just as crazy with the stolen house.** Otto's claim that the bank needed notice is ridiculous on its face, and invites the federal courts to investigate him for civil rights violations, under the color of law. (However, the bank certainly did get notice, not only by Daniggelis recording a statement of forgery in the recorder's office, but the Bank was also notified of this fraud by voluminous and lengthy litigation which ensued. Because this court has continued to ignore Joseph Younes' clear fraud, he has been allowed to gut, damage, and destroy Daniggelis' house, as more clearly explicated in *City of Chicago v. 1720 N. Sedgwick, Joseph Younes, et. al.*, case number 2017-M1-400775, in the Civil Division, a case, overseen by Judge Patrice Ball-Reed, and which case has been featured numerous times in *DNAinfo*, my blog, “The Register,” and more recently, *ChicagoCityScape*: <https://blog.chicagocityscape.com/landmarks-commission-still-threatening-fines-if-house-inhistoric-district-isnt-worked-on-once-390f052a2ab2>

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 5 of 12

**10 . Briefly state the general issues proposed to be raised (failure to include an issue in this statement will not result in the waiver of the issue on appeal):**

1. Whether it is finally clear that Daniggelis is the victim of mortgage fraud, which even Judge Otto's March 08, 2013 Order admits:

**A. Issue of fact** as raised regarding Ottos false claims about the documents weren't signed, even tho the record says otherwise. **The standard of review** here is “clear error” or “plain error,” depending on your verbiage.

**B. Issues of law** (which are reviewed *de novo*, as this court has just as good a grasp on the law as the trial courts), regarding forgery and fraud. Here, the courts below – again – made “clear error” or “plain error,” depending on your verbiage.

2. Whether this court will refuse to hear the merits of this case and deny Daniggelis Due Process because of ineffective counsel. This may not be illegal, but it certainly runs afoul of the other three major standards:

**A. Unconstitutionally** denying Daniggelis his Federal Due Process rights to have a fair day in court—as further codified in Rule 10-100(a) (Illinois Supreme Court Commission on Access to Justice), which states: “The Illinois Supreme Court Commission on Access to Justice is established to promote, facilitate, and enhance equal access to justice with an emphasis on access to the Illinois civil courts and administrative agencies for all people, particularly the poor and vulnerable,”

**B. Immoral**, as his house was stolen, and he wasn't paid a dime, and was made homeless, sleeping in his rental van, there for a spell, and stressed out, as he is elderly. Do morals matter anymore?

**C. Impractical:** While this court was not bound by law to accept my amicus curiae briefs, it only delayed the inevitable to refuse to review them with scrutiny: This caused additional delays and headaches for both the litigants (victims) and the court.

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 6 of 12

**Certification of Appellant**

As attorney for the appellant -X- **Pro Se appellant**, I hereby certify that on the **8th** day of **January**, 2018, I asked / made a written request to the clerk of the circuit court to prepare the record on appeal, and on NO day of **any month**, 2018, did I make a written request to the court reporting personnel to prepare the transcript(s).

\_\_\_\_\_  
Date    Appellant’s Attorney    Pro Se Appellant

In lieu of court reporting personnel’s signature I have attached the written request to the court reporting personnel to prepare any “Reports of Proceedings prepared in accordance with Illinois Supreme Court Rule 323” – by checking the appropriate box in my “Request for Preparation of Record on Appeal.”

\_\_\_\_\_  
Date    Appellant’s Attorney    Pro Se Appellant

I hereby acknowledge receipt of an order for the preparation of a report of the proceedings.

\_\_\_\_\_  
Date    Court Reporter or Supervisor

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 7 of 12

In the Appellate Court of Illinois, First District

Docket Number: \_\_\_\_\_

GMAC Mortgage, LLC n/k/a: Bank ) Appeal from the Circuit Court of Cook  
of America, N.A., aka: "LaSalle ) County, Illinois, County Department,  
Bank National Association," aka: ) Law Division  
"US Bank, NA," as trustee for )  
Morgan Stanley Loan )  
Trust 2006-16AX, ) Circuit Court Case No.: 2007-CH-29738  
**Plaintiff,** ) (Transfer into Law Division from Chancery)  
) )  
**vs.** ) Trial Judge: Hon. Diane M. Shelley (#1925)  
Richard B. Daniggelis, ) Date of Notice of Appeal: Monday, 08 January 2018  
Gordon Wayne Watts, Josph ) Date of Judgment: December 07, 2017  
Younes, Paul L. Shelton, Erika R. ) Date of Post-judgment Motion: None  
Rhone, LEGATEES, NON-RECORD ) Order: #5  
CLAIMANTS, UNKNOWN HEIRS ) Supreme Court Rule which confers  
UNKNOWN OWNERS, et. al., ) jurisdiction upon the reviewing court:  
**Defendants.** ) Ill.Sup.Ct. R.301, 303

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 8 of 12

**NOTICE OF FILING**

To: See attached Service List

PLEASE TAKE NOTICE that today, Monday, 08 January 2018, I am causing to be filed with the **ILLINOIS 1<sup>st</sup> Appellate Court** my **Docketing Statement and Notice of Appearance of Counsel for Appellant**, this **Notice of Filing**, an **Updated and Corrected "Service List"** of parties, my **Request for Preparation of the Record on Appeal**, my **"Application for Waiver of Court Fees."** and attached **Exhibits**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)



**SERVICE LIST**

\* **1st District Appellate Court**, Clerk's Office, 160 North LaSalle St., Chicago, IL 60601  
**(312) 793-5484 , Office Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays**

\* **CIVIL APPEALS DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 801  
Chicago, IL 60602 – (312) 603-5406, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

\* **Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court  
of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602

\* **Hon. James P. Flannery, Jr.**, Cir. Judge–Presiding Judge, Law Division [re: “Application for  
Waiver of Court Fees”] 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343

\* **Law Division and Hon. Diane M. Shelley, Circuit Judge, served by email / electronic  
service only, as a courtesy, since this is an appeal: [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ;  
[ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov)**

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis 773-327-7198  
2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

\* **Unknown Owners/NonRecord Claimants** 1720 North Sedgwick St., Chicago, IL 60614-5722

\* **Andjelko Galic** (Atty#:33013) Cell:312-217-5433, Fax:312-986-1810, Phone:312-986-1510  
845 Sherwood Road, LaGrange Park, IL 60526-1547 (**Please take note of Mr. Galic's new  
address**) Email: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) ; [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com)

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as:  
“**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**  
Attn: Carrie A. Dolan, 208 S LASALLE#1860, CHICAGO IL, 60604 [ph:(312) 726-2252]

\* **MERS** (Mortgage Electronic Registration Systems, Inc.) <https://www.mersinc.org/about-us/about-us> a nominee for HLB Mortgage; Janis Smith, 703-738-0230, VP, Corp. Comm. is no  
longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com)) has replaced her as an email  
contact; Sandra Troutman 703-761-1274, E: [SandraT@mersinc.org](mailto:SandraT@mersinc.org) Dir, Corporate  
Communications, 1595 Springhill road, Suite 310, Vienna, VA 22182  
**(703) 761-0694 / (800)-646-6377**

**SERVICE LIST (continued from above)**

- \* **Stewart Title, Attn: Leigh Curry**  
<http://www.Stewart.com/en/stc/chicago/contact-us/contact-us.html>  
2055 W. Army Trail Rd., STE 110, Addison, IL 60101 [ph:(630) 889-4050]
- \* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142
- \* **Richard Indyke, Esq.** Atty. No. 20584, (312-332-2828 Atty for LaSalle Bank Natl. Assn.),  
Email: [RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305
- \* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)  
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com)  
or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602
- \* **John P. LaRocque**, 2 Orchard Place, Hinsdale, IL 60521 [Last known address]
- \* **Paul L. Shelton**, (630) 993-9999, (630) 333-4009, (630) 286-5100, / Direct: (630) 842-0126  
(Atty. #15323, disbarred per IARDC) E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net)  
<http://www.il-reab.com/agents/26812-paul-l-shelton-shelton-associates-hinsdale-il-60523>  
c/o: Shelton Law Group, LLC, <https://www.youtube.com/user/PaulSheltonLawGroup>  
1010 Jorie Blvd. #144, Oak Brook, IL 60523
- \* **Paul L. Shelton, Pro Se**, 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351
- \* **Paul L. Shelton** [PH: 630-986-5555], 10 North Adams Street, Hinsdale, IL 60521
- \* **Erika R. Rhone** 9948 South Normal, Chicago, IL 60628-1229
- \* **Erika R. Rhone** [ph:(773) 788-3711], 22711 Southbrook Dr., Sauk Village, IL 60411-4291
- \* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)
- \* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>  
312-635-5716, per website 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596  
Phone: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408. Email: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com)

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 10 of 12

**In the Appellate Court of Illinois, First District**

Docket Number: \_\_\_\_\_

GMAC Mortgage, LLC n/k/a: Bank of America, N.A., aka: "LaSalle Bank National Association," aka: "US Bank, NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,	) Appeal from the Circuit Court of Cook County, Illinois, County Department, Law Division
<b>Plaintiff,</b>	)
<b>vs.</b>	)
Richard B. Daniggelis,	) Circuit Court Case No.: 2007-CH-29738
Gordon Wayne Watts, Jospheh Younes, Paul L. Shelton, Erika R. Rhone, LEGATEES, NON-RECORD CLAIMANTS, UNKNOWN HEIRS UNKNOWN OWNERS, et. al.,	) (Transfer into Law Division from Chancery)
<b>Defendants.</b>	) Trial Judge: Hon. Diane M. Shelley (#1925)
	) Date of Notice of Appeal: Monday, 08 January 2018
	) Date of Judgment: December 07, 2017
	) Date of Post-judgment Motion: None
	) Order: #5
	) Supreme Court Rule which confers jurisdiction upon the reviewing court:
	) Ill.Sup.Ct. R.301, 303

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

\* The undersigned **Defendant-Appellant, Gordon Wayne Watts**, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Docketing Statement and Notice of Appearance of Counsel for Appellant, Notice of Filing, an Updated and Corrected "Service List"** of parties, my **Request for Preparation of the Record on Appeal**, as an attached **Exhibit "B,"** copies of which are attached hereto and herewith served upon you—and upon the parties listed in the attached Service List, above – this Monday, 08 January 2018, via the Cook County, IL Electronic Filing system if they're e-file registered, and if I can access it for this Notice of Appeal

\* I am concurrently serving all parties via First Class U.S. Postal Mail and/or FedEx 3rd-party commercial carrier (whichever proves more convenient).

\* Additionally, I shall, when practically possible, post a TRUE COPY of this filing –and related filings –online at my official websites, supra –linked at the "Mortgage Fraud" story, dated Fri. 14 April 2017.

\* Lastly, I may, later, cc all parties via e-mail, if I am able. ***Respectfully submitted,***

_____	<u>/s/ Gordon Wayne Watts</u>
(Actual Signature, if served upon clerk)	(Electronic Signature)
<b>Gordon Wayne Watts</b>	<b>Gordon Wayne Watts</b>

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawyer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

ELECTRONICALLY FILED  
1/8/2018 8:58 PM  
2007-CH-29738  
PAGE 11 of 12

Request for Preparation of Record on Appeal

EXHIBIT B

(Rev. 8/28/08) CCA 0025

APPEAL TO THE APPELLATE COURT OF ILLINOIS FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, LAW DIVISION, First Municipal District, Calendar "W"

GMAC, et. al., Plaintiffs / Appellees
Daniggelis, Watts,
Younes, et. al., Defendants / Appellants

Reviewing Court No.
Circuit Court No. 2007 - CH - 29738
Honorable Diane M. Shelley, Circuit Judge
Trial Judge
Date Notice of Appeal Filed Monday, 08 January 2018

REQUEST FOR PREPARATION OF RECORD ON APPEAL

Attorney (or Party if no attorney):

Name: Mr. Gordon Wayne Watts Cook County Attorney Code No. 99500 or Pro Se 99500
Address: 821 Alicia Road, City: Lakeland State: Florida Zip: 33801-2113
Telephone Number: H: 863-688-9880 / C: 863-409-2109

Attorney for: Pro Se E-mail Address (optional) Gww1210@aol.com / Gww1210@Gmail.com
Name of Party GordonWatts.com GordonWayneWatts.com

NOTICE IS HEREBY GIVEN to the Clerk of the Circuit Court of Cook County that Mr. Gordon Wayne Watts requests the preparation of the Record on Appeal in the above case.

DESIGNATION OF RECORD

The Clerk of the Circuit Court of Cook County shall prepare the Record on Appeal in accordance with Illinois Supreme Court Rule 321. The record on Appeal shall include the common law record, which consists of trial documents filed and judgments and orders entered by the trial court and:

- All documentary exhibits entered at trial, except for those other exhibits that cannot ordinarily be included for review and are subject to motion.
Reports of Proceedings prepared in accordance with Illinois Supreme Court Rule 323.
Certificate in Lieu of Record on Appeal pursuant to Illinois Supreme Court Rule 325.

Documents filed under seal on the following dates and unsealed:
A copy of the trial court Order authorizing these documents to be unsealed for the purpose of inclusion in the Record on Appeal is attached hereto or will be provided by the Appellant to the Civil Appeals Division at least 30 days in advance of the date on which the Record on Appeal is scheduled to be transmitted to the Appellate Court. Upon return of the Record on Appeal to the Circuit Court, it is the responsibility of the parties to obtain an Order resealing these records, if the records are to be resealed.

Documents filed under seal on the following dates, which are to remain sealed:
Please note that, pursuant to Rule 17 of Appellate Court of Illinois, "No record, exhibit, or brief may be filed under seal in the Appellate Court, unless Appellate Court has first given leave for filing under seal, notwithstanding that the material was filed under seal in the Circuit Court."

FEES

Payment may be made by Cash, Check or Money Order. Cash payments accepted for in-person payments only. Checks or money order should be made to Clerk of the Circuit Court of Cook County. Pursuant to 705 ILCS 105/27.2a(k) and 27.2(k), the Clerk of the Circuit Court of Cook County must charge fees for Records on Appeal in advance as follows:

- 100 pages or less, \$110
100 - 200 pages, \$185
Each page in excess of 200, \$.30/page
Reduced fee for Local Governments and School Districts, \$50

All prescribed fees are due in advance of transmission of the Record on Appeal. It is understood and agreed that once a request for preparation of a Record on Appeal is made by submission of this form, the Appellant is responsible for the costs of preparing the Record on Appeal, regardless of whether the Appeal is successful, dismissed, the time is extended, or a party elects to not transmit the Record on Appeal to the Appellate Court. The Clerk of the Circuit Court of Cook County reserves the right to pursue a claim to recover the costs and expenses, including reasonable attorneys' fees, related to preparation of the Record on Appeal.

Mr. Gordon Wayne Watts
(Type or print name)

(Signature of Appellant or Appellant's Attorney)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

MONDAY, 08 January 2018

ELECTRONICALLY FILED
1/8/2018 8:58 PM
2007-CH-29738
PAGE 12 of 12

# Law DIVISION

## Litigant List

Printed on 01/09/2018

Case Number: 2007-CH-29738

Page 1 of 2

### Plaintiffs

Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
GMAC MORTGAGE LLC			0000	
BANK AMERICA NA			0000	
CHICAGO VOLUNTEER LEGAL			0000	
LASALLE			0000	
US BANK NATIONAL ASSOCI			0000	

Total Plaintiffs: 5

### Defendants

Defendant Name	Defendant Address	State	Unit #	Service By
DANIGGELIS RICHARD			0000	
GORDON WAYNE WATTS			0000	
HLB MORTGAGE			0000	
INVEST ONE			0000	
LAROCQUE JOHN			0000	
LEGATEES			0000	
MOORE ROBERT			0000	

MORTGAGE ELECTRONICS RE	0000
NON RECORD CLAIMANTS	0000
PHONE ERIKA	0000
SHELTON PAUL	0000
STEWART TITLE ILLINOISZ	0000
TRUST ONE MORTGAGE	0000
UNKNOWN HEIRS	0000
UNKNOWN OWNERS	0000
YOUNES JOSEPH	0000

Total Defendants: **16**