

To: Atty. Albert S. Krawczyk, Esq., Senior Counsel, Illinois Attorney Registration and Disciplinary Commission 130 E. Randolph Dr., STE 1500, Chicago, IL 60601-6209, PH: 312-565-2600 (Switchboard), PH: 312-540-5277 (Mr. Krawczyk), PH: 312-540-5278 (Ms. Golden), E-mails: RGolden@iadc.org, AKrawczyk@iadc.org

Cc: Thomas P. Simpson, Assistant State's Attorney (Thomas.Simpson@CookCountyIL.gov) Cook County State's Attorney's Office, Special Prosecution Bureau, 2650 South California (13 B 08), Chicago, IL 60608

Cc: Deidre.Dyer@CookCountyIL.gov, StatesAttorney@CookCountyIL.gov, David.Williams@CookCountyIL.gov (*Mr. Simpson's two immediate supervisors at last check*)

Subject: Re: Joseph Younes, in relation to Gordon Wayne Watts, case #: 2015-IN-03387 and in relation to Richard B. Daniggelis, case #: 2016-IN-02697 [[and with references to 2015-IN-03388, the sister case to 03387, as it touches Paul L. Shelton]]

Date: Tuesday, 23 January 2018

Dear Mr. Krawczyk:

I am in receipt of your postal letter to myself, and to Rich Daniggelis, dated Monday, September 11, 2017, in which you replied to my email dated Tuesday, 25 April 2017.

My deep apologies for waiting 4 months and 12 days for responding to your 9-11-17 letter; I will not say anything critical to you for having waited 4 months and 17 days to reply to my 4-25-17 letter. Indeed, you were good enough to let me email you (saving my postage & printing costs and time to mail), and moreover, your replies are the most detailed analyses and replies of anyone to date in my various inquiries to cops, courts, and news media types. [I'll spare you the reasons for my delay, but it suffices to say that I lost Internet due to poverty, & now use 'alternate' means of getting online, and also am busy with other things, including taking care of elderly parents, and a new appeal in this matter, in case you want to follow: ***GMAC v. Gordon Wayne Watts***, which has been docketed in the In the Appellate Court of Illinois, First District, Docket Number: 1-18-0091.]

I'm writing you because I uncovered what is, probably, the most unusual thing I have ever seen in all my many years, —and which basically puts this matter to rest: The judge who executed the order to change title of Daniggelis' house wrote an order [in *GMAC v Daniggelis*, in **Chancery**, case number 2007-CH-29738] dated **March 08, 2013**, in which the judge basically admitted fraud, and made my case stronger. Direct link for convenience (but check with trial court to verify—and I hope to remember to include a PDF attachment of this order for your convenience).

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

or:

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

Since I gave “damning evidence” beyond all reasonable doubt in my proposed *amicus* brief, which you've read, I don't actually need any further proof, but I stumbled upon this, and as I think you'll trust a judge's legal findings more than a non-layer, non-judge, I shall share the judge's findings:

1. FORGERY

As you recall, I pulled records which showed identical signatures on 2 warranty deeds, indicating a photocopy had occurred, and supporting Richard's claims that this felony (with no statues of limitations) had occurred. (The State's Attorney Office never disputed my claims, but they're reluctant to do anything, as the identity of the criminal who committed this crime wasn't known). However, since you didn't believe me, maybe you'll believe a judge, and one who has no motives to make a legal finding which would suggest his later rulings were wrong, but you can't ignore the elephant in the room, and here it is: **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 forgery - all by itself - would void the entire illegal transfer of title .

While I might be wrong about possibly getting Joseph Younes confused with his father, the late Habib Younes, regarding representing Daniggelis, it's without dispute that Younes & Paul Shelton represented Daniggelis in the later issue of possibly refinancing or seeking investors, and Shelton is documented to have been Younes' law partner, *meaning both of them were in this together:*

*** Documentation that Shelton was Younes' former law partner: March 21, 2011 complaint against Atty. Paul L. Shelton, by the IARDC Administrator, Commission No. 09-CH-58:**

http://www.iardc.org/rd_database/rulesdecisions.html (Look up case by entering 'Younes')

Your claim that Shelton's disbarment was for “unrelated misconduct” is, no disrespect meant, total nonsense, Mr. Krawczyk: It was for exactly the same thing: **Mortgage Fraud**. Since Shelton lost both his broker's **and** law licenses for mortgage fraud, now with new evidence from Judge Otto's newly-uncovered 2013 Order, admitting fraud, the fact that Shelton & Younes were law partners is of no small moment. Remember, the forgery - *all by itself*—would void the entire illegal transfer of title, and this new information (that Shelton was Younes' law partner—and the supporting legal memo from Judge Otto, above) only cements the inevitable legal conclusion of frauds, well-beyond the “clear and convincing” standard which governs the IARDC, here.

You're not a dumb person, nor do I think you are dishonest, so your actions here can only remind me of the proverb about a frog in a tub of water, which, when heated gradually, doesn't alarm the frog, and he doesn't notice the dangerous temperature increases, as they're gradual, and then the water boils, killing the frog. Perhaps, the new evidence is pouring in so slowly that it raises no alarms... That is the basis for *Stare Decisis*, but sometimes precedent is NOT correct.

2. SERIOUS CODE VIOLATIONS – repeated several times, continuing unchecked...

You might recall that I gave repeated warnings to The Court's Chancery, Civil, and Law Divisions that Younes was damaging, gutting, and destroying Daniggelis' house, and getting cited for serious Code Violations by the City of Chicago, remember? I filed a “**Time-Sensitive Judicial Notice of Adjudicative Facts – in semi-Emergency Fashion by OVERNIGHT FedEx**” to all three (3) divisions on about 9-9-2015 or a few days later, since the court's dockets have small time delays. Yes, that's right, all 3 cases (Civil, Chancery, and the new Law Division cases) all heard from me giving a clarion-call warning about Younes, way back in late **2015**.

However, the Court (and the IARDC), in its infinite wisdom, ignored me, and let Younes continued unchecked (from the 2015 destruction, documented above), and, as a result, Younes escalated his damage so badly that even many local news media were now paying attention! For your reference, this code violation case is the one which was featured in at least seven (7) recent *DNainfo* stories, and other news sources—two of which are shown here for brevity, documenting escalation into **2017**:

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

** “‘Rotted’ Old Town House Owner Given 45 Days To Come Up With Repair Plan,” by Ted Cox, *DNainfo*, Sept 01, 2017: <https://www.dnainfo.com/chicago/20170901/old-town/rotted-old-town-house-owner-given-45-days-come-up-with-repair-plan>

—and several related stories *The Register*, for which I'm the editor-in-chief, & more-recently, *ChicagoCityScape*: ** “Landmarks commission still threatening fines if house in historic district isn't worked on once building permit is issued,” by Ted Cox, *ChicagoCityScape*, Nov 09, 2017:

<https://blog.chicagocityscape.com/landmarks-commission-still-threatening-fines-if-house-in-historic-district-isnt-worked-on-once-390f052a2ab2>

Be assured I'm not suggesting that it would be right to use the news media to bully the IARDC into action if it's not justified, OK? I do have morals & scruples. However, if there's legal justification to act, and the IARDC refuses, the bad press coverage would amplify the negative results, because refusal to enforce IARDC standards would be both **illegal** and certainly **immoral**, and then, with bad press, also **impractical**: It brings a bad name upon the IARDC, which is bad in how it harms dedicated & sincere IARDC employees. Indeed, if you're going to use the “courts didn't rule” excuse, why even have an IARDC? Simply let “the courts” handle everything. Many observers, including the City of Chicago, think Younes attempted to let Daniggelis' house fall into disrepair to “get around” a prohibition against demolishing the house, which is protected by Historic District rules. In fact, if you look at my “motion to intervene” in *City of Chicago v. 1720 Sedgwick, Younes, et. al.*, **2017-M1-400775, dated 5/18/2017**, on the court's docket, or a similar motion to intervene, dated 07/7/2017, in the LAW DIVISION case 07CH29738, you'll see another attorney coming forward to testify to *DNainfo* that Younes ADMITTED this!

DNAinfo reported that a local attorney, who has no motives to be sued for slander, libel, or defamation of character, said as much: “Jordan Matyas, who represented the Old Town Triangle Association at Thursday's court hearing, said Younes was being disingenuous in saying he didn't intend to level the site. "He's told me twice that he always wanted to demolish it," Matyas said, and he told the judge that he intended to pursue a demolition permit as well. "So we have some mixed signals from the owner, but his actions speak clearly about his intent for the building.”” [Source: “'Rotted' Historic Building In Old Town Triangle Could Be Seized By City,” by Ted Cox, *DNAinfo*, March 30, 2017: <https://www.DNAinfo.com/chicago/20170330/old-town/rotted-historic-building-old-towntriangle-could-be-seized-by-city>] See also EXHIBIT-A in my 5/18/2017 filing in this case for details about the damages to Rich's house by Joseph Younes, e.g., *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. [[For your convenience, I shall copy and paste in a screenshot of said news item, quoting this other attorney.]]

3. The POA (Power of Attorney) and its limitations by two (2) side-agreements

You're an attorney, Mr. Krawczyk, so you'll love this “legal mystery,” since it addresses issues of FACT (not issues of law, the usual fare), and as it's a lot harder to catch a judge making a stupid mistake here (appeals courts give great deference to a trial court's finding of **fact**, whereas issues of **law** are reviewed *de novo*, the reviewing court having the same abilities here as the trial court), the fact that this dumb country bumpkin non-lawyer (self-deprecating description of myself) could catch a very sharp judge in such a mistake on “issues of fact” should gain great respect—without any further ado or hype, here's what I found: **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, which fraud - all by itself - would void the entire illegal transfer of title. If you can't access my website, please see contact the trial court for official records, here. [The legal mystery is why the judge made such a stupid mistake, and also why the IARDC or other judges didn't catch, or act on, this mistake –or the other mistakes I am finding.]

4. Lack of Consideration (Payment) issues

There's no material disagreement with repeated assertions that Richard Daniggelis never got paid, which is a key proof of fraud that's being alleged by multiple parties. (Daniggelis wouldn't simply give away the farm, for free. Moreover, even had he done so, the case law in my various *amicus* briefs 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's plain that Daniggelis didn't 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. But even if you think my case law, here, is “outdated,” the fact Daniggelis didn't get paid shows he had NO motive to give away—for free—the house and all its equity, thus the transfer of title was not authorised by Daniggelis, **and is therefore NOT legal or valid. At all. Period.**

5. The judge's total 'nonsense-crazy' legal argument—very bizarre!..

On **page 7** of Judge Otto's ORDER, he claims that the 'difficulty' for Daniggelis is that, even assuming the signature to be altered (forgery 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 didn't 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: Daniggelis recording a statement of forgery in the recorder's office: Indeed, Otto admits (**Order, p.4**) that: "In April 2007, Daniggelis filed a Notice of Forgery with the Recorder of Deeds, stating that the deed filed in August 2006 [i.e., the one dated "July 9, 2006"] was a forgery." Moreover, the Bank was also notified of this fraud by voluminous and lengthy litigation which ensued. [Thus, Otto's claim that the bank wasn't notified is **contradicted by himself**, no less.] However, more-important than the fact Otto's claims were **in contradiction to himself is the fact his ridiculous argument is in direct contradiction to absolute truth and common sense**, and that this trial court judge used said 'nonsense' argument as an excuse to "rubber stamp" plain & obvious fraud. Otto further admits (**Order, p.4**) that: "Daniggelis contends that the deed he signed in May 2006 was intended to take effect only if the property was sold on or before May 31, 2006. He claims that the July 2006 closing took place without his awareness or consent," and the Record on Appeal clearly supports Daniggelis' valid claim, which Otto acknowledges, **but thereafter ignores. Judge Otto's 'arguments' (particularly, #5, supra) are totally ridiculous.** But, even worse would be anyone with common sense supporting this judge or his crazy, nutty ruling, here. (Why the FBI or Attorneys General, state or federal, don't get involved on this, I don't know. This is not unlike a judge issuing a ruling that you and I are a cat and a dog... nutty, *no*? How this this bizarre legal logic, above, any less nutty... really?)

6. BURDEN OF PROOF ISSUES

As an aside, the trial courts committed Manifest Error in applying the "Burden of Proof" backwards regarding ownership of 1720 N. Sedgwick (house & property, which has hundreds of thousands of dollars of equity, as many of us have documented in our past filings, below). [Daniggelis was forced to prove that his house was his, beyond all reasonable doubt, even though the circuit court should clearly have demanded that Younes and Shelton be the ones to meet this threshold before just snatching house, land, & equity.] So, any reliance upon the courts by the IARDC is misplaced, and possibly dangerous to its reputation.

You did something similar here when you made a statement in your 9-11-2017 reply to me that Younes couldn't keep track of his mortgage payments and let Daniggelis stay there for free. (Page 2 of 3, paragraph 4) While your statement is 'technically' true, you're implying that Daniggelis got some sort of favour, but this is patently wrong. First off, Younes' possession of Daniggelis' house was fraudulent, whether or not he got a "rubber stamp" from a clearly nutty judge. You know it, I know it, and we all know that you know it, and while some may not have been paying attention, you can not convince me that this transfer is valid or legal. As such, Younes has "unclean hands," and thus no legal rights to profit or benefit from the property. In fact, Daniggelis lost the ability to rent out or get investors due to the cloud over the title, for reasons not his fault. You applied the burden of proof backwards, in my view. [Likewise, whether or not any judges or other attorneys complained to the IARDC about Younes is not legally relevant to my complaints – interesting, and even persuasive, yes, but not binding or significant. Indeed, if a judge is protecting his lawyer friend, by issuing **ILLEGAL** orders, do you really think the judge would then nark on said lawyer and thus **implicate** himself... oh, really?]

7. Younes' documented lies to the IARDC... do these not count for anything?..

Lastly, whether or not Daniggelis' lawyer presented any good case law is of no import: I have, and if you know of violations, then failures on the part of others is not important: The police generally don't demand to know why others didn't call 911, but rather simply respond to a valid 911 call, as I hope you do. Let us not forget that, in my Tuesday, 25 April 2017 response to the IARDC, I caught Younes in numerous lies, at very the least, [[#1]] his ridiculous claims that he had no idea what I was talking about, even in spite of my numerous legal filings and other complaints; or, [[#2]] the bogus legal claims by Younes, when he falsely claimed that this was a "piece of property that I purchased at arm's length from Richard Daniggelis." Oh, really? Does Younes

think you don't know the legal definition of 'at arm's length'? – or, [[#3]] In my Saturday, 30 April 2016 cross-reply, I quoted your February 19, 2016 letter to me, where you said that: “Mr. Younes explained that he purchased the property from Mr. Daniggelis...” --**which we know is a lie because NO record of payment exists. Period.**

Are Younes' continued documented lies and exceptional embarrassment to the legal profession OK with you, Mr. Krawczyk? (Getting in *DNAinfo*, *The Register*, and now, *ChicagoCityScape*, and then continuing the same things that got Shelton disbarred and written up in the Chicago Tribune, ABC Local, and others.) *Oh, really?*

8. Conclusion:

((a)) Younes' documented lies, above; **and**, ((b)) Younes' admission of a conspiracy (see *infra*), from which he later profits & benefits; **and**, ((c)) Judge Otto's admission of facts supporting & documenting fraud claims (see *supra*); **and**, ((d)) Younes' repeated attempts to gut, demolish, and destroy Daniggelis' house (see recent *DNAinfo* stories, or see the *City of Chicago v. Younes, et. al.* case in Civil: 2014-M1-400775) are individually or collectively sufficient for IARDC discipline against Younes, for unprofessional conduct, not unlike the recent IARDC action against Younes' former law partner, Paul Shelton, who lost both his broker's license, and then his law license. [And, in my view, Younes' crime is *worse*, as he profits off these illegal acts.]

* **RECAP:** Documentation that Shelton was Younes' former law partner: March 21, 2011 complaint against Atty. Paul L. Shelton, by the IARDC Administrator, Commission No. 09-CH-58: http://www.iardc.org/rd_database/rulesdecisions.html (Look up case by entering 'Younes')

* **NEW:** Documentation that Younes admitted conspiracy, and then benefited from it, thus implicating himself: EXHIBIT-Exhibit-D(2.) “Younes complaints to OAG about Linda Green conspiracy: Feb 06, 2013” – an exhibit in the “04/21/2017” motion filed by “pro se” (e.g., myself), in 2007-CH-29738, the Law Division case (not the Chancery case), and available from either the court or from my own docket. Younes' complaint to the OAG is a Public Records document that the Office of Attorney General released to me, showing a complaint that Younes had made against DocX, U.S. BanCorp, Nationwide Title Clearing, and Bank of America, N.A., regarding the infamous “Linda Green” fraud assignments. [[For your convenience, I am attaching this exhibit as “Apx-D-Note-to-Richard.pdf” (3.3 MB)]]

Now, I have one concern: If Younes loses his law license (or is even censured), his ability to earn monies (people may be afraid to hire him if he gets into trouble) sufficient to fix up Daniggelis' house that he damaged & destroyed may evaporate. Then, Mr. Daniggelis would have to turn to charity or the community to fix his house (or lose it to the city for being too dangerous to inhabit). But, stopping Younes and his other co-conspirators, many of whom are who are repeatedly refusing to answer subpoenas in the law division case which I'm appealing (*GMAC v Daniggelis, Watts, Younes, et. al., 2007-CH-29738, in the Law Division*) would be worth it. Otherwise, all will know, realise, & understand that you are supporting, enabling, and outright condoning the behaviour of this attorney, which most, I think, would find repugnant. If the IARDC doesn't act on these blatant violations, what is the purpose of the IARDC? So, you are justified in censuring Younes; **however**, if you disagree with me, either in part, or in full, you are more than welcome to point out where you think I'm wrong on some or all of my points, above.

With kind regards, I Am,

Sincerely,

/s/ Gordon Wayne Watts

Gordon Wayne Watts

Other documents:

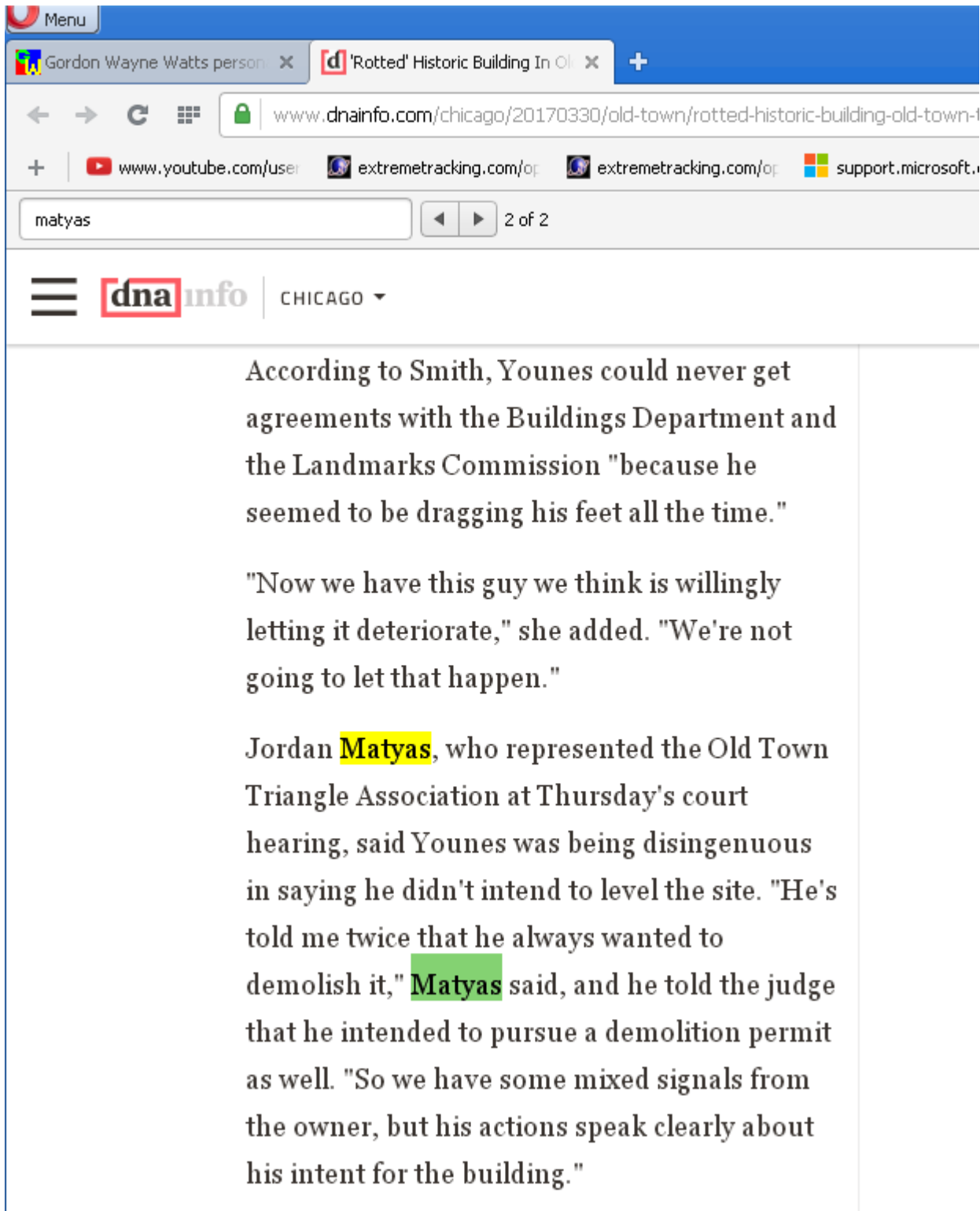
Below are 2 screenshots of the ***DNainfo*** story quoting the other attorney, who basically calls Younes a liar regarding his alleged lack of intentions to use demolition to destroy Daniggelis' house, as a way of getting around the Landmark / Historic District restrictions laid down by the City of Chicago Landmark's Commission:

Besides that, I'm sending the following other PDF documents:

- ** Tue23Jan2018_GordonWayneWatts_reply-to_IARDC.pdf** (363 KB) – THIS DOCUMENT, HERE –
- ** Apx-D-Note-to-Richard.pdf** (3.3MB) [[This has Younes' admission to AOG of conspiracy, from which he later profits & participates—implicating himself.]]
- ** IARDC-reply-dated-11-Sept-2017.pdf** (453 KB) [[Your reply to which I am responding.]]
- ** 3-8-2013-MOTION-DENIED.pdf** (440 KB) [[Judge Otto's order, which is worth its weight in Gold, as it basically backs up & supports most or all of my main legal and factual claims.]]

DNAinfo story section quoting Jordan Matyas, who effectively calls Younes a liar

[Source: "Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, *DNAinfo*, March 30, 2017: <https://www.DNAinfo.com/chicago/20170330/old-town/rotted-historic-building-old-towntriangle-could-be-seized-by-city>]



DNAinfo news item (screenshot) News item title page of story quoting Matyas, above
[Source: "Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, *DNAinfo*, March 30, 2017: <https://www.DNAinfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city>]

Gordon Wayne Watts person x 'Rotted' Historic Building In Old Town Triangle x +

www.dnainfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seize

www.youtube.com/user/ extremetracking.com/o/ extremetracking.com/o/ support.microsoft.com/

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'Rotted' Historic Building In Old Town Triangle Could Be Seized By City

By Ted Cox | March 30, 2017 5:00pm
| Updated on March 30, 2017 10:43pm
@tedcoxchicago

With the steeple of St. Michael's Roman Catholic Church in the ...

View Full Caption DNAinfo/Ted Cox

OLD TOWN TRIANGLE — The city has moved to seize control of a historic landmark district building that it says has been left to rot at 1720 N. Sedgwick Ave.

"We believe that this owner is allowing the building to deteriorate so he can obtain a demolition permit," said Ald. Michele Smith

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