

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

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.	)	Case No.: 2007 CH 29738
aka: “LaSalle Bank National Association,” aka “US Bank,	)	
NA,”as trustee for Morgan Stanley Loan Trust 2006-16AX,	)	Before: Hon. Diane M. Shelley
Plaintiff	)	Calendar "W", Courtroom 1912
vs.	)	
	)	Presiding Judge so assigned –
Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,	)	or whichever other judge
Defendants	)	may so preside in Law Div.

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**Motion for leave to file *Amicus Curiae* brief**

While it would appear that Friend of the Court (*Amicus Curiae*) briefs are not common in Illinois courts, nonetheless, they are permitted: *Kinkel v. Cingular Wireless, L.L.C.*, 223 Ill. 2D 1; 857 N.E.2d 250; 306 Ill.Dec. 157 (Jan. 11, 2006), holds that an *Amicus* needs merely offer helpful information that the parties have overlooked—which I clearly do insofar as I use several legal arguments that no lawyers on either side have used. [This holding is analogous to Rule 37.1 of the U.S. Supreme Court, which states: “1. An *amicus curiae* brief that brings to the attention of the Court relevant matter **not already brought to its attention by the parties** may be of considerable help to the Court.” (Emphasis added in bold-faced underline for clarity; not in original)] Illinois Courts also adopt a 7th Cir. Federal Court standard in which ((#1)) a party is not represented at all; ((#2)) the 'direct interest' test; **or**, ((#3)) the same test as above: Helpful info overlooked by the parties. NOTE: The 7th Circuit test uses the key operator “or,” meaning that any one “or” the other of the three tests need apply. See e.g., *NOW, et al. v. Scheidler, et al.*, (Nos. 99-3076, 99-3336, 99-3891 & 99-3892, 7<sup>th</sup>. Cir., Opinion July 31, 2000: [http://media.ca7.uscourts.gov/cgi-bin/rssExec.pl?Submit=Display&Path=Y2000/D07-31/C:99-3076:J:\\_:aut:T:op:N:0:S:0](http://media.ca7.uscourts.gov/cgi-bin/rssExec.pl?Submit=Display&Path=Y2000/D07-31/C:99-3076:J:_:aut:T:op:N:0:S:0)

**Second *AMICUS CURIAE* BRIEF OF GORDON WAYNE WATTS  
IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS**

**I. Introduction**

This brief is an addendum to update the filings (sworn affidavit, *amicus* brief, & “Time-Sensitive Judicial Notice of Adjudicative Facts-in semi-Emergency Fashion by OVERNIGHT FedEx,”), which are docketed as 09/14/2015 (tho actually filed by mail a few days earlier). This Court has acknowledged receipt of both the docketed copies and courtesy copies—and is presently reviewing them in this Mortgage Fraud case [which has a hearing today in Room 1912 @9:00am, CST], but new events require today's update.

**II. Interests of the *Amicus***

This *amicus* is friends with Mr. Daniggelis, the victim of this mortgage fraud, but even aside from that, his religious beliefs compel him to do justice and defend the defenseless, as he did in his 4-3 loss, before Florida's State Supreme court, in the infamous Terri Schiavo case (case law cited in prior filings). As *amici* are, theoretically, permitted in IL courts, this *amicus* asserts his Redress and free exercise of Religion rights, two of the five rights guaranteed by the First Amendment.

**III. Summary of the Case File / Subsequent Statement of Facts**

The statements & affirmations of fact contained in the 09/14/2015 sworn Affidavit of *Amicus*, Gordon Wayne Watts, filed in the above-captioned case, are incorporated by reference herein as if fully set forth

herein. **In addition to that which I stated back in late 2015, there were some new developments, and this “Statement of Facts” picks up where I left off in my prior filings:**

As you can see in my Sept. 09, 2015 “Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi*-Emergency Fashion by OVERNIGHT FedEx,” (shown on docket as '9/14/2015'), I issued a solemn warning to This Court (and other courts) that Atty. Joseph Younes, the co-defendant in the above-captioned case, and who benefited from the forged signature, was gutting, destroying, and otherwise engaged in illegal construction and/or demolition to the extent that the City of Chicago Building Department was forced to issue a “STOP WORK ORDER.” I implored This Court to issue a TRO (Temporary Restraining Order) aka an Injunction to save the house from illegal destruction (which would moot the appeal pending at the time, and moot all other court action). But, This Court, in its infinite wisdom, chose to ignore me.

More recently, however, Younes engaged in *additional* illegal construction and/or demolition, **again** drawing the ire of the City Building Department. But this time, left unchecked by the courts, and given the “green light” to proceed at full-throttle, Younes engaged in much *worse* destruction, so much so that it made several local news media:

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

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

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

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

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

((d)) “Chicago Courts refuse to help elderly 'Mortgage Rescue Scam' victim; make him homeless,” from Staff Reports, *The Register*, December 01, 2015: [updates to this 2015 story reflect the new developments]

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

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

I am tempted to yell “I told you so,” to the courts & local news media that ignored my pleas, but even nonlawyers, as myself, realise that this would be unprofessional (thus nonproductive) to put in any court filing, so I will refrain. But, it suffices to say that the undersigned *Amicus* is confident that This Court is, after many missteps, now doing its genuine best to justly review/redress these egregious grievances.

Moreover, I solemnly warned the courts that Atty. Andjelko Galic (also a friend of mine, and the lawyer representing Richard Daniggelis) kept missing filing dates (**see: Exhibit-F**), not to mention that he failed to include several key vital arguments, any one of which could – individually – show that forgery had occurred. Either or both of these could justify an *amicus* brief. While many parties have stated that Daniggelis is 'represented' by an attorney, and thus would not need any help, Mr. Daniggelis recently told me that there is only one thing worse than being unrepresented, and that would be to be represented by an attorney who keeps missing court dates and fails to get key documents into the court record, like the 2 police reports (**see: Exhibit-A**), about the break-in by the bank, and the initial forgery complaint, both of which Galic refused to get. In fact, the police refused to give Daniggelis his own report but gave me a copy, under Freedom of Information -albeit redacted a little bit. The system is “broke” when an outsider

like *myself* has more access to a police report than the **victim, himself**—and when the victim's own lawyer adamantly refuses to get it (which is what the police told Daniggelis would need to be done to get a copy of these 2 police reports). **Both police reports give more proof of Mortgage Fraud, and, as such, Galic should have entered them into the record: They were dispositive to key elements of the case—namely showing mens rea on the part of the bank, Paul Shelton, and Joseph Younes.** For details of the break-in, please refer to the 11/16/2015 “MOTION FILED,” by “MOORE ROBERT” (sic: misspelling, and should read: Robert J. More). Mr. More claims 'trespass on the case' by the bank, which broke in, and did not get investigated by the police, because (according to Daniggelis), the police viewed the illegal break & entry as a “civil” matter (which it is not: breaking & entering is criminal in nature).

Daniggelis also told me that Judge Sconza, on one occasion, would not let him defend against this mortgage fraud without an attorney, but refused to provide a court-appointed attorney. He reports that all contemporary witnesses to that exchange said that had Daniggelis not been allowed to represent himself (which is his right) he would have lost his house right then & there, meaning that, while I believe the judge may have had good motives in insisting Daniggelis be quiet until he got a lawyer, nonetheless, this implicated Procedural Due Process, and biases the courts against those who are too poor to afford an attorney.

One more fact needs to be added: I recall Mr. Daniggelis telling me that Judge Otto said, in open court, that he (Daniggelis) was at the closing, but not at the deposition. Mr. Daniggelis said that this was **backwards**: that he *was* at the deposition, but **not** at the closing, and did not even know about it. I include this recollection because Atty. Galic has the transcripts of what Judge Otto said, and other records of attendance can check Judge Otto's accuracy, and, since it's possible that Judge Otto got these key facts “wrong,” this is clear reversible error. In Otto's defense, I recall Daniggelis telling me that Younes lied about some aspect of his attendance at the closing, either that Daniggelis supposedly claimed his back hurt and to proceed without him, or that he did, in fact attend. [I urge The Court to question Daniggelis on this, and other, points, as both lawyers and judges have told him to be quiet – to be seen & not heard.]

Looking at my notes, taken when speaking to Mr. Daniggelis, I now recall one thing that he claims that Judge Sanjay T. Tailor (who preceded Judge Diane M. Shelley on this case) told Atty. Galic: When Galic was having trouble deposing John LaRouche (who kept evading the deposition), Daniggelis said that Tailor suggested to Galic to use subpoenas, instead. I'm not sure what was meant, but Mr. Daniggelis wanted This Court to know about it because, according to him, his lawyer was negligent in refusing Judge Tailor's offer. [Daniggelis thinks that Younes didn't bring “his own money” to the closing, relying instead on LaRouche, and that this is violation of some law. I don't know what the law here it, but mention is because it may be of relevance later.] More importantly, though, LaRochce or others may know who executed the forgery.

I am almost finished with the “updates” to this Statement of Case/Facts, as stated in my prior Affidavit. (I was going to get this statement notarised, like the last one, but due to the holidays and other factors, I will have to submit a “regular” brief this time. But I trust **This Court** still gives my assertions full weight & credit.) So, in conclusion, I am appending my prior filings with new developments of fact & new arguments at law.

#### **IV. Argument**

The legal arguments contained in the 09/14/2015 “*AMICUS CURIAE* BRIEF OF GORDON WAYNE WATTS,” filed in the above-captioned case, are incorporated by reference herein as if fully set forth herein. **New developments raise newly-discovered legal arguments—as follows:**

First, given the gravity of the situation (felony forgery, committed against an elderly victim, destruction of

a house worth almost a million dollars—in the historic district—coupled with repeated failures of the system, letting it “slip through the cracks,” so to speak), it is appropriate to briefly recap the prior arguments:

In my prior *Amicus* brief in this case (09/14/2015), Arg.IV.A. (Photocopied (forged) signature), I prove what others merely alleged: While Benji Philips (Daniggelis' other attorney) did raise the issue of a “Whiteout,” that proves nothing: Anyone can make a mistake, and what's what Whiteout is used for.

**This point is so important, I will “camp out” here for just a moment:** When I tell “ordinary Joe's” (e.g., non-attorneys and people who don't know about this case) the example of “what if you saw your driver's license signature” and then saw your signature on something else—but EXACTLY the same as on your driver's license, what might we conclude? ANSWER: **All** respondents to my question rightly concluded that someone would've had to have photocopied their signature, since no mere mortal can sign his/her name exactly the same twice in a row. (Had the handwriting merely been 'similar,' then, yes, we might need a “handwriting expert,” but here, beyond all reasonable doubt, this was a forgery by photocopying a prior signature of Daniggelis, when a prior deal fell through because Daniggelis was wise enough to put in place side-agreements that protected him.) Thus, forgery, which has no statutes of limitations, was conclusively proved to have been done, and subpoenas & depositions (which previously did not address this point) are in order—so that witnesses may turn on one another, and the truth may come out. **This fact alone proves fraud!**

Arg.IV.C (Lack of consideration (payment)) gives compelling proof that Daniggelis would not just “hand over” his property (as was alleged). (Moreover, even were he to do so, no contract is valid without consideration, e.g., payment.) **This fact alone proves that Daniggelis had no motive to 'sign over' his house & property as alleged, thereby showing fraud!** And, in case anyone doubts, Arg.IV.D. Proves this: There is **no record of payment. Period. Equals: fraud!**

Arg.IV.G. (Forged POA (Power of Attorney)) shows, in the exhibits, 2 versions of the POA, one notarised & one not. While Daniggelis did sign this, nonetheless, notarising a document “after the fact,” as here, shows *mens rea*, Criminal Intent. **However, Daniggelis brought to my attention one key element that I'd overlooked in my last *Amicus* brief:** He told me that the fact that he admits to signing this POA would make it look like he really did sign over his house (which is not true). **So, I will address that here:** Yes, Daniggelis signed this POA, but first off, the record shows he had several side agreements that limited the parameters, meaning that the house could not just get transferred over. In case you don't “get” this argument, I'll spell it out for you: We see that Paul Shelton (who got disbarred over another mortgage fraud case) & Joseph Younes (who is likely to get disbarred in like manner) did not transfer title on that first signature, which is proof of the existence of the side-agreements, OK? So, that deal “fell through,” and Younes was getting greedy. So, what did he do? Well, as shown above, there was a forgery (via photocopy) of Daniggelis' signature, and then Judge Michael F. Otto, eventually, approved the 'sale,' lifting the 'cloud' on the title, caused by the affidavit Daniggelis executed of the forgery. [I put 'sale' in quotes, as no sale occurred.] I respectfully move This Court for clarification as to why Judge Otto's order is legal and just.

### **The “Batmobile” Argument**

Younes might assert that he did not know that there was a forgery (and this might have been true, in the past). Indeed, looking at the email exchange between myself and Asst. State's Attorney, Thomas Simpson [see: **Exhibit-G**], Simpson clearly tells me that he doesn't know who did the forgery, and that this is the reason he can't prosecute. But is this really so?

Indeed, as the record shows, Younes was put on notice of this photocopy forgery fraud (a felony with NO statutes of limitation, e.g., a 'serious' felony!) by virtue of both the court docs I filed, as well as that which his office signed for and received. [See e.g., **Exhibit-B and Exhibit-C, where Younes feigns ignorance, and I catch him in several lies –including this one –in my exchanges with the IARDC.**]

That would be like some 17-year-old kid stealing The Batmobile from a museum, and selling it to a stranger, on the street, for a few hundred dollars: Everyone knows the Batmobile belongs in a museum (or, in the Bat Cave, with Batman!), and does not belong to some 'ordinary Joe,' OK? Thus, the poor bloke who tries to tell Police that he bought the Batmobile, and is unable to tell who sold it to him would **\*\*still\*\*** get arrested for “Dealing in Stolen Property,” ok?

Likewise, while we may not know (right now) who effected the photocopy forgery of Daniggelis' signature, we do know that it was a forgery—and now, so does Younes. So, like the poor bloke who 'bought' the Batmobile, and plead ignorance, Younes, too, is guilty of **\*\*KNOWINGLY\*\*** dealing in stolen property, and being part-and-party to the use of the forgery, which, again, has no statutes of limitations = equals = jail time for Mr. Younes if the States' Attorney supervisors (with whom I am in communication) accept my legal arguments and overrule Asst. State Atty. Thomas Simpson's decision to not prosecute.

It is, however, of no small moment that Asst. State Atty. Simpson admitted in a recent email exchange that he agreed with me, and believed that a crime had been committed. He is, I believe, honest, and wants to do the right thing. (How many others will have their houses stolen? This must stop!) However, Simpson is afraid, since one “bad ruling” (by Judge Otto) caused a domino effect, and put all others in fear of doing the right thing. Other arguments (Subrogation, Linda Green robo-signing, conflict of interest, res adjudicata, etc.) were raised by myself and Galic in prior filings, and will not be repeated here for the sake of brevity.

However, here is one thing that has not been mentioned at all, so I will mention it: Looking at the complaint that Joseph Younes filed with the Illinois Attorney General [see: **Exhibit-D**], we see he complains about supposed conspiracy between banks and title companies, regarding the robo-signing fraud, OK? However, what does Younes do? He continues the transaction with said entities, and benefits from the transaction in question: Even **if** there was no robo-signing conspiracy, Younes admits as much, and then participates (and benefits from) said conspiracy, so he is admitting (by his actions, which speak louder than words) of his guilt.

Lastly, while I am not wont to take a swipe at a judge (it would be unprofessional, and morally wrong, no matter how much I disagree with a ruling), I must state, for the record, that Judge Michael F, Otto committed (whether intentionally or not, I do not know) a very serious libel, when, in his recent ruling, he said that I was bragging that it would be OK to use vexatious litigant tactics. His exact words: “The argument that all strangers to a case should be allowed to engage in the tactics of a vexatious litigant are so unpersuasive as to require no further discussion.” (OTTO order, dated Dec. 07, 2015, in case 07-CH-29738, in other words, the Chancery case that was transferred to the Law Division.) **That is false:** If you look within the 'four corners' of my various pleadings before Judge Otto's court, the only things I said about vexatious litigants was the fact that my friend, Robert J. More (who is a named party, in this above-captioned case) was labeled as a vexatious litigant, by this court (and other courts), and that I noted that Mr. More's filings got into the record, and I told the court that since I was **\*\*not\*\*** a vexatious litigant, and had followed the rules, I expected it would be only right to treat me as well. (I did **\*\*not\*\*** ever threaten to use vexatious litigant tactics, nor do I condone or tacitly support such. Otto was wrong in his off-colour comment, which is sad: Other than that comment – and several obviously very bad rulings he made against myself and Daniggelis – Judge Otto showed himself to be a very bright jurist, insofar as gave excellent attention to both fact and law, and did so in a timely manner—more than I can say about some judges, who flatly ignored similar pleadings, and whom I shall not name, in this venue, out of

professional respect.)

### CONCLUSION:

**Looking at Exhibit-E**, the only exhibit I did not mention above, I see that Daniggelis files this pleading before the Appeals Court, when his lawyer, Atty. Galic, went out of the country, let both appeals get dismissed for want (lack) of prosecution, and then took no action to ask the court to prevent his house from being destroyed by Younes. This is impressive for a non-attorney to do (and looking closely at it, I see similarities in some things I've filed, which showed that Mr. Daniggelis was paying attention to details!).

However, at the end of the day, he is not an attorney, and he should not be required to do “attorney things,” just to get a fair day in court. Judge Otto's comments about Daniggelis being “doggedly represented” by Galic & Philips, and how these attorneys “filed voluminous motions,” in his 10/29/2015 “MOTION TO – DENIED” on the Chancery Docket of this case, are a misrepresentation of the facts: Daniggelis got mediocre, not 'doggedly' representation at best, and then got very obviously unfair rulings, not supported by law.

When Galic filed a motion before Tailor, asking my Amicus brief to be stricken, this was a clear sign that he was intimidated by the court: In other cases, where I've filed Amicus briefs, no lawyer on my side has ever had a problem with my support, so the problem is clearly with Galic's fear of the court—some of which I think is founded.

Galic has dropped the ball too many times to be trusted to represent Daniggelis all by himself, but Galic is still useful, and Daniggelis and I both hope Galic will continue to offer help, as needed. My pleadings, alone, should be sufficient to prove a forgery occurred, but the only way that This Court can get to the bottom of this debacle would be to depose everybody about that matter, and issue bench warrants for those who might abscond (like John LaRoche is doing). That Judge Tailor did not issue a bench warrant or other subpoenas is disquieting. However, I ask: Is the court up to squeezing the truth out of “the players” who were involved in this forgery—getting them to testify against one another, until the truth comes out?

Please take note of my motion for rehearing (dated 11/30/2015 on the docket). Looking at it, I now see that that I was wrong about the telephonic conference rule: It is optional, not mandatory. Since I am willing to admit wrong, This Court should know that I am not above admitting wrong on the forgery and fraud issues, here. But, if I am wrong, The Court will have to show me; otherwise, an unjust ruling is allowed to stand. **The conclusion of the whole matter is this: Chancery transferred the case to Law, and with all appeals dismissed for want of prosecution, The Law Division has full, complete, and plenary jurisdiction on the merits of the case, and can correct reversible error. Is the court up to the task of deposing all witnesses to actually get to the bottom of this mess & learn the Truth?**

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

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above “**Second AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS,**” and its exhibits were delivered to the following parties as indicated – this Monday, the 17<sup>th</sup> day of April 2017:

LAW DIVISION: Richard J. Daley Center, 50 West Washington St., Room 801  
[Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; (312) 603-6930 ; (312) 603-5426  
Chicago, IL 60602 – , Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

Hon. Diane M. Shelley, Circuit Judge, Law Division:

[Note: I may, for the convenience of the new judge, who replaces Judge Sanjay T. Tailor, include a few hard copies of old filings, but shall not serve them upon other parties, as I've already served them properly.] [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov)

(312) 603-5940, (312) 603-7551, (312) 603-4811

Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602

Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)

(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)

Email: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) ; [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com) ;

134 N. LaSalle St., STE 1040, CHICAGO IL, 60602

*(Note: The Nov. 16, 2015 proposed order by Mr. Galic in the Law Division case by the same case number suggests that STE 1810 is a old address and that he is now in STE 1040.)*

Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl. Assn.),

221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

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

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

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

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

One North LaSalle Street, Suite 3040, Chicago, IL 60602

*(Note: Mr. King has informed me that the Wacker Drive address is outdated and that this address is the current service address, and his law office website, listed above, confirms this is correct.)* I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods.

Paul L. Shelton, Esq.

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

Joseph Younes Law Offices / <http://ChicagoAccidentAttorney.net> (312)635-5716, per website

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

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

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

MERS (Mortgage Electronic Registration Systems, Inc.)

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

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

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

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

Note: MERS is only being served electronically per above.

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above “Second AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS,” and its exhibits, were served upon all parties listed above, this 17th day of April, 2017 by the following methods:

- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

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

- Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra-- linked at the “Mortgage Fraud” story, dated. Fri. 14 Apr. 2017.*

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

Gordon Wayne Watts, *Amicus Curiae*\*

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880

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Date: Monday, 17 January 2017

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

## INDEX TO THE EXHIBITS

<u>Instrument</u>	<u>Docket/Tab#</u>
<b>Both police reports</b>	<b>Exhibit-A</b>
29 October 2013 [Report #: HW512419] that bank employees broke locks,	
25 September 2009 [Report #: HR563391] that Mortgage Fraud [financial exploit of Elderly]	
23 April 2003 [Report #: HJ319798] unrelated report that was included in FOIA request	
<b>IARDC complaint, dated 08 October 2015</b>	<b>Exhibit-B</b>
<b>IARDC complaint, dated 30 April 2016</b>	<b>Exhibit-C</b>
<b>Note to Richard Daniggelis, dated 16 April 2017</b>	<b>Exhibit-D</b>
Besides commentary/discussion, this note contains 5 documents:	
1. Lawsuit against Younes filed: Bank America NA filed Contract complaint on: 07-03-2012	
2. Younes complaints to OAG about Linda Green conspiracy: Feb 06, 2013	
3. Sweet Loan Mod: US Bank & Younes: Sept 11, 2013 (pages 8-9) or Oct 15, 2013 (page 10)	
4. Lawsuit against Younes dropped: Dismiss by stipulation or agreement: 10-23-2013	
5. Judge Otto rules in favour of Younes: May 15, 2014	
<b>Richard's Emergency motion and ORDER</b>	<b>Exhibit-E</b>
<b>Two key rulings directed at Atty. Andjelko Galic</b>	<b>Exhibit-F</b>
<b>Email exchange with Cook County State's Attorney Office</b>	<b>Exhibit-G</b>
(Note: I may print out only the first seven pages of this as my exhibit, for the sake of brevity, but the PDF file, when I serve it 'electronically,' is a 23-page document. Whether or not I include all 23 pages in the attachment will be dependent on things like printing costs, but I will serve the parties the same thing that I serve the court, in any case, so as to not effect bad service.)	