

1  
2  
3  
4  
5  
6  
7  
8

**IN THE APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT**

**PEOPLE OF THE STATE OF ILLINOIS,**  
*Plaintiff-Appellee,*

v.

**EHAB ALLABABIDI,**  
*Defendant-Appellant, Pro Se.*

APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT

Appeal No. **2-26-0352**

Appeal from the Circuit Court of  
Lake County, No. **23 CF 1146**

The Honorable Christopher R. Stride,  
Judge Presiding

9  
10  
11  
12  
13  
14  
15  
16

**COMPLETE FILING — RECORD COPY**

*Everything filed in the Second District on July 28, 2026, stitched for Appellant's records*

| # | Document                                                 | Pages   |
|---|----------------------------------------------------------|---------|
| 1 | Rule 606(g) Criminal Docketing Statement                 | 2–5     |
| 2 | Omnibus Emergency Motion                                 | 6–8     |
| 3 | Memorandum of Law in Support of Omnibus Emergency Motion | 9–15    |
| 4 | Proposed Order on Omnibus Emergency Motion               | 16–17   |
| 5 | Notice of Related and Prior Appellate Proceedings        | 18–19   |
| 6 | Supporting Record under Rule 328 — Exhibits A through Z  | 20–117  |
| 7 | Notice of Filing and Proof of Service                    | 118–119 |

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Page numbers in this index are pages of this stitched copy, not of the individual documents. The Application for Waiver of Appellate Court Fees and its proposed order are filed with the Court but omitted here; they are financial disclosure and form no part of the argument. This copy is for Appellant's records and is not a filed instrument.

**IN THE APPELLATE COURT OF ILLINOIS  
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SECOND DISTRICT

Appeal No. **2-26-0352**

Appeal from the Circuit Court of  
Lake County, No. **23 CF 1146**

The Honorable Christopher R. Stride,  
Judge Presiding

**RULE 606(G) CRIMINAL DOCKETING STATEMENT**

*Rules 312 and 606(g) — jurisdictional disclosure — due August 6, 2026*

This appeal is timely. Eight days before the deadline Appellant delivered a written Rule 606(a) request to the circuit clerk, twice, and the transmission log records both as **Delivered**. He was unrepresented when he sent it, by force of the circuit court's own two orders: the October 6, 2025 minutes recite “Defendant Proceeds Pro Se,” and the June 17, 2026 order discharges the Public Defender *nunc pro tunc* to that date. Rule 606(a) then placed the duty to prepare, sign, and file the notice on the clerk. The clerk stamped it July 23. That timestamp records when the office acted. It does not relocate the date Appellant did.

|                                |                                                                                                                                                                                                                                                                       |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Reviewing-court docket</b>  | 2-26-0352                                                                                                                                                                                                                                                             |
| <b>Complete case title</b>     | People of the State of Illinois v. Ehab Allababidi                                                                                                                                                                                                                    |
| <b>County / circuit number</b> | Lake County / 23 CF 1146 (23CF00001146)                                                                                                                                                                                                                               |
| <b>Trial judge</b>             | Hon. Christopher R. Stride                                                                                                                                                                                                                                            |
| <b>Order appealed</b>          | Order entered June 17, 2026 and file-stamped June 18, 2026 lifting the stay of the 180-day Lake County Jail term; the June 17 minutes; and the June 17 order discharging the Public Defender <i>nunc pro tunc</i> to October 6, 2025                                  |
| <b>Nature of the order</b>     | A one-sentence postjudgment order activating a stayed term of imprisonment, entered on the State's <b>oral motion</b> at a proceeding the minutes classify as “Status.” It recites no violation found, no evidence, no burden, no willfulness finding, and no reason. |
| <b>Status of the petition</b>  | The State's May 14, 2026 petition for revocation has never been heard or decided. No order of the circuit court adjudicates it. The State obtained the relief its petition prayed for without ever proving the petition.                                              |
| <b>Notice of appeal</b>        | Rule 606(a) written request delivered by fax July 9, 2026, twice, both “Delivered”; renewed request and notice of appeal file-stamped July 23, 2026                                                                                                                   |
| <b>Case classification</b>     | Felony — aggravated reckless driving / bodily harm, 625 ILCS 5/11-503(a)(1), Class 4. Count 2 nolle prosequi September 8, 2025.                                                                                                                                       |
| <b>Custody status</b>          | A custodial warrant issued May 28, 2026 for a “technical violation” remains outstanding. It directs that Appellant “shall be held in custody for First Appearance Court,” and it has stood for sixty-one days.                                                        |

Prepared July 28, 2026 by the self-represented Appellant.

## 1. Appellant

|                   |                                                                                                                                                                                                                                |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name              | Ehab Allababidi                                                                                                                                                                                                                |
| Address           | 8516 W. Winona St., Chicago, Illinois 60656                                                                                                                                                                                    |
| Telephone         | (773) 920-0030                                                                                                                                                                                                                 |
| Email             | defcon5ready@gmail.com                                                                                                                                                                                                         |
| Counsel on appeal | None. Appointment requested under Rule 607(a). Appellant receives SNAP benefits; three tribunals have adjudicated him indigent; and Lake County's own probation division re-set his fee obligation on transfer of supervision. |

## 2. Appellee and counsel

|                      |                                                                                                                                                                         |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appellee             | People of the State of Illinois                                                                                                                                         |
| Trial counsel        | Lake County State's Attorney's Office. Eric F. Rinehart, State's Attorney. Nicholas Shepherd, Assistant State's Attorney, personally swore the petition for revocation. |
| Address              | 18 N. County Street, Third Floor, Waukegan, Illinois 60085                                                                                                              |
| Telephone / email    | (847) 377-3000 / statesattorney@lakecountyil.gov                                                                                                                        |
| Appellate prosecutor | Office of the State's Attorneys Appellate Prosecutor, Second District; 2032 Larkin Avenue, Elgin, Illinois 60123; (847) 697-0020                                        |

## 3. Court reporting personnel

|                                  |                                                                                                                                                                                                                                                                                                   |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Administrator                    | Patty Cadrecha, Court Reporter Supervisor                                                                                                                                                                                                                                                         |
| Address / contact                | 18 N. County Street, Waukegan, Illinois 60085; (847) 377-3904; courts@lakecountyil.gov                                                                                                                                                                                                            |
| Proceedings requested            | September 8 and October 6, 2025; May 28 and June 17, 2026; and every other appearance required by Rule 608(a)                                                                                                                                                                                     |
| Capture method, from the minutes | October 6, 2025 — <b>Mary K. Herbst</b> , a named reporter, so a stenographic record should exist. May 28 and June 17, 2026 — <b>ECR Specialist</b> . That source media is the only neutral account of the two proceedings that produced a warrant and a jail term, and it must be preserved now. |

## Issues proposed to be raised

- A. Whether the appeal is timely under Rule 606(a), *People v. Sanders*, 40 Ill. 2d 458, 461–62 (1968), and *People v. Parrott*, 2017 IL App (3d) 150545, ¶¶ 18–20, where Appellant twice delivered a written request to the clerk eight days early and the clerk stamped the notice on July 23.
- B. Whether a court may convert a stayed 180-day jail term into immediate custody on the State's oral motion, at a “Status” call, without the hearing, the State's burden of proof, and the adjudication of a violation that 730 ILCS 5/5-6-4(b)–(c) require — or even the “notice and a hearing” section 5-6-4(f) requires for the lesser act of modification. *People v. Fischer*, 2013 IL App (1st) 110193, ¶¶ 43–47.
- C. Whether imprisonment could be activated on a financial ground where the Financial Sentencing Order carries **no restitution figure at all**, the principal property loss had already been paid in full by an insurer in the sum of \$16,557.00, and the order makes every remaining financial obligation payable in monthly installments due in full on December 8, 2027 — nineteen months after the petition was filed.

- D. Whether section 5-6-4(d) permitted revocation absent any finding of willful refusal to pay, and whether the Fourteenth Amendment permitted imprisonment without the inquiry *Bearden v. Georgia*, 461 U.S. 660, 672–73 (1983), requires, where Appellant receives SNAP and where the liability insurer states in a filing to a state regulator that it retained counsel to pay and that the State's Attorney's office would not respond. *Turner v. Rogers*, 564 U.S. 431, 444–49 (2011).
- E. Whether a sworn allegation that Appellant “tested positive for Amphetamine (illegal substance)” can support custody where the supervising probation officer had adjudicated the same result in writing five months earlier — “it is all negative in my eyes because I know you are still taking the Adderall” — and where the sentencing condition prohibits only “prescription medication of another.”
- F. Whether the petition may support custody where it misstates the order it enforces, reciting a public-service rate of “20 hours per month” against the order's 12, omitting the words “or prescription medication of another” from condition 4, and dating the drug screen ten days apart from the memorandum that generated it.
- G. Whether the failure-to-report allegations can stand where the county's own November 10, 2025 filing records that supervision was “transferred from Lake County and accepted by Cook County as of 10/1/2025,” a transfer the petition never discloses.
- H. Whether Appellant had counsel, validly waived counsel, and could participate on June 17, 2026, where the minutes list the Public Defender, an order entered the same day discharges that office *nunc pro tunc* to October 6, 2025, the May 28 warrant recites “PD APPOINTED,” the Clerk's office told him in writing that his motions “must be filed by your attorney,” and no Rule 401(a) admonition appears anywhere. *Alabama v. Shelton*, 535 U.S. 654 (2002); *Mempa v. Rhay*, 389 U.S. 128, 137 (1967); *People v. Barker*, 62 Ill. 2d 57, 59 (1975).
- I. Whether a *nunc pro tunc* order entered June 17, 2026 can retroactively undo an appointment the same court made by its warrant of May 28, 2026, where such an order may only memorialize what the court actually did and “may not be used for supplying omitted judicial action.” *People v. Melchor*, 226 Ill. 2d 24, 32 (2007).
- J. Whether the May 28, 2026 warrant, which recites a “technical violation” and commands that Appellant be “held in custody,” can be squared with section 5-6-4(b), under which the court “shall admit the offender to pretrial release pending the hearing unless the alleged violation is itself a criminal offense.”
- K. What relief is required: a stay under Rule 609; vacatur of the June 17 order; a properly noticed hearing with counsel or a valid waiver, a complete record, and express findings; correction of the record under Rule 329; and such further relief as Rule 366(a) permits.

### **Written requests for the record — Rule 312**

Written requests for preparation of the record were made twice and are in the supporting record filed herewith: the Rule 606(a) packet delivered to the circuit clerk by fax on July 9, 2026 (Ex. A), and the renewed request and Rule 607 motion file-stamped in the circuit court on July 23, 2026 (Exs. F, Q). No ruling has been entered on either.

Appellant directs no further request to the Clerk of the Circuit Court or to court reporting. Those offices are adverse on the questions this appeal presents — the classification of his June 15, 2026 filing as “Correspondence,” the counsel entries of May 28 and June 17, 2026, and the absence of any report of proceedings. On June 8, 2026 the Clerk's office told him in writing that his motion “must be filed by your attorney,” nine days before the same court discharged that attorney *nunc pro tunc*. (Ex. Y.) Production is therefore sought by order of this Court under Rules 608, 329, and 366, as Part IV of the omnibus motion filed herewith requests.

### **Verification**

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), I certify that the statements set forth in this instrument are true and correct, except as to matters stated on information and belief, and as to those matters I certify that I verily believe them to be true. Every description of a court record in this instrument is drawn from the document identified for it in the supporting record filed herewith.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI**

Defendant-Appellant, Pro Se

8516 W. Winona St., Chicago, Illinois 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: July 28, 2026

IN THE APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,  
*Plaintiff-Appellee,*

v.

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APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT

Appeal No. **2-26-0352**

Appeal from the Circuit Court of  
Lake County, No. **23 CF 1146**

The Honorable Christopher R. Stride,  
Judge Presiding

**OMNIBUS EMERGENCY MOTION**

*Rule 606(a) and 606(c) · Rule 609(a) stay · Rule 607 counsel and transcript · Rules 329, 361, 366, and 608 record production*

A one-sentence order entered on the State's oral motion at a proceeding captioned "Status" activated 180 days of incarceration. The petition that asked for it has never been heard. Appellant moves for four forms of relief in this single instrument, and requests a ruling on Part II by July 31, 2026.

**Relief requested**

- Part I — Jurisdiction.** CONFIRM that the appeal is timely under Rule 606(a); ALTERNATIVELY GRANT leave under Rule 606(c) and direct that the July 23, 2026 notice stand.
- Part II — Liberty.** STAY the June 17, 2026 order and the 180-day term; STAY, RECALL, or PROHIBIT execution of the May 28, 2026 warrant; and RELEASE Appellant on recognizance or the least restrictive conditions supported by a stated necessity.
- Part III — Counsel.** DIRECT a Rule 607(a) indigency determination within three court days, APPOINT appellate counsel on that finding, and ORDER the report of proceedings without charge under Rule 607(b).
- Part IV — Record.** ISSUE the docketing order; ORDER preservation and production of the record and reports of proceedings under Rule 608; DIRECT correction under Rule 329 of Appellant's representation status on May 28 and June 17, 2026; and SUSPEND briefing until the certified record is filed.

The accompanying Memorandum of Law sets out the record support for each Part. The proposed order filed herewith is drawn to be signed as a single instrument.

**Part I. Jurisdiction — the appeal is timely**

Eight days before the deadline Appellant delivered a written Rule 606(a) request to the circuit clerk's published fax number. The transmission log records the status as **Delivered**, twice, at 2:46 p.m. and 3:14 p.m. on July 9, 2026. (Exs. A–B.) The packet identified the case and the June 17 order, invoked Rule 606(a) by

name, and enclosed a completed notice of appeal.

He was unrepresented when he sent it, by force of the circuit court's own records: the October 6, 2025 minutes recite “Defendant Proceeds Pro Se” (Ex. V), and the order entered June 17, 2026 discharges the Public Defender *nunc pro tunc* to that date (Ex. O). Rule 606(a) then placed the duty to prepare, sign, and file the notice on the clerk. *People v. Sanders*, 40 Ill. 2d 458, 461–62 (1968); *People v. Parrott*, 2017 IL App (3d) 150545, ¶¶ 18–20. The July 23 stamp records when the office acted; it does not relocate the date Appellant did. Should the Court deem leave necessary, this motion falls within Rule 606(c)'s first window and the excuse is documentary.

## **Part II. Liberty — the order must be stayed**

Section 5-6-4 governs both the modification and the revocation of probation. *People v. Fischer*, 2013 IL App (1st) 110193, ¶ 44. The June 17 order is one or the other, and neither path was taken. Revocation required a hearing, the State's burden of proof by a preponderance, and a finding of violation. 730 ILCS 5/5-6-4(b)–(c), (e); *Fischer*, ¶ 43 (citing *People v. Barker*, 62 Ill. 2d 57, 59 (1975), and *People v. Hall*, 198 Ill. 2d 173, 177–78 (2001)). Modification required “notice and a hearing.” § 5-6-4(f). The minutes record an oral motion at a status call and no evidence, no witness, no admission, and no finding. (Exs. M–N.)

The grounds alleged fail independently. The Financial Sentencing Order carries no restitution figure; the principal loss was paid by an insurer before sentencing; nothing was due in full until December 8, 2027; and no willfulness finding exists, as 730 ILCS 5/5-6-4(d) and *Bearden v. Georgia*, 461 U.S. 660, 672–73 (1983), require. (Exs. I, I-3, S.) The drug allegation was adjudicated compliant in writing by the supervising officer five months before it was sworn. (Ex. W.) The reporting allegation names a county that no longer held supervision. (Ex. X.) The warrant commands custody for a “technical violation” against section 5-6-4(b)'s mandatory release. (Ex. L.) A 180-day term cannot be returned once served, and condition 30 makes the exposure a felony conviction as well.

## **Part III. Counsel and the report of proceedings**

Rule 607(a) directs the circuit court, on the notice of appeal, to determine indigency and appoint counsel; Rule 607(b) supplies the report without charge. Appellant receives SNAP and filed the official fee-waiver application herewith. A Rule 607 motion was file-stamped below on July 23, 2026 and remains unruled. (Ex. Q.) *Griffin v. Illinois*, 351 U.S. 12, 18 (1956); *People v. Banks*, 378 Ill. App. 3d 856, 861 (2d Dist. 2007). No appellate counsel is presently identified for Appellant, and the record cannot establish whether he had counsel on the day his liberty changed.

## **Part IV. The record must be ordered, not requested**

Appellant does not ask this Court to direct him to renew requests to the offices whose conduct is under review. The Clerk's office told him in writing on June 8, 2026 that his motion “must be filed by your attorney” (Ex. Y); the filing that was accepted was docketed as “Correspondence” and never calendared; and no motion he has filed in that cause since has been ruled on. Written requests were made on July 9 and again on July 23, 2026 and are in this record. (Exs. A, F, Q.) What remains is an order.

Rule 608(a) requires the clerk to prepare the entire record including reports of proceedings for every appearance; Rules 608(b)–(c) fix the deadlines. Rules 323(c) and (d) supply a bystander's report or agreed

statement if no verbatim record is obtainable, and Rule 46 recognizes an approved electronic recording — the capture method the minutes identify for both May 28 and June 17. Rule 329 permits correction of a material inaccuracy: the June 17 minutes list counsel as present while an order entered the same day discharges that counsel retroactive to October 6, 2025, and the May 28 warrant recites “PD APPOINTED.” Rules 366(a)(3) and (a)(5) and Rule 361 supply the authority and the procedure.

### Second District Local Rules 102(b) and 109

|                                |                                                                                                                                                                                                                                             |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Order at issue</b>          | June 17, 2026 order lifting the stay of the 180-day term; file-stamped June 18.                                                                                                                                                             |
| <b>Relief sought below</b>     | Emergency Rule 609(a) motion and Rule 607 motion, both file-stamped July 23, 2026. Neither has been ruled on.                                                                                                                               |
| <b>Why this Court must act</b> | The order and the warrant operate now. A generic call is set for August 6, 2026 — the same day the docketing statement is due here.                                                                                                         |
| <b>Requested deadline</b>      | Part II by July 31, 2026, or immediately upon review.                                                                                                                                                                                       |
| <b>Conferral</b>               | Delivered written position requests July 9, 2026 to the Lake County State's Attorney and the State's Attorneys Appellate Prosecutor; renewed July 28, 2026. No response has been received. That is reported as no response, not as consent. |

### Verification

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), I certify that the statements set forth in this instrument are true and correct, except as to matters stated on information and belief, and as to those matters I certify that I verily believe them to be true. Every description of a court record in this instrument is drawn from the document identified for it in the supporting record filed herewith.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI**

Defendant-Appellant, Pro Se

8516 W. Winona St., Chicago, Illinois 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: July 28, 2026



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The Honorable Christopher R. Stride,  
Judge Presiding

**MEMORANDUM OF LAW IN SUPPORT OF OMNIBUS EMERGENCY MOTION**

*Timeliness · and every ground of the June 17 custody order, set beside the document it enforces*

On June 17, 2026 a stayed 180-day jail term was activated on the State's oral motion at a proceeding the minutes call "Status." The petition that asked for that relief was filed May 14, 2026 and has never been heard. No order adjudicates it. This memorandum takes each ground the petition alleges and places it beside the document it describes. Not one survives the comparison, and the Court can verify every one of them from the record filed with this motion.

**I. Jurisdiction: the clerk's timestamp is not Appellant's default**

Rule 606(a) speaks in commands. When an unrepresented defendant requests *in writing* that he wishes to appeal, the clerk must prepare, sign, and file the notice. *Sanders* settled the allocation: it is "clear that once a defendant in a criminal matter requests an appeal the duty of filing the notice of appeal is upon the clerk of the trial court," 40 Ill. 2d at 461, and the clerk's failure "provided reasonable excuse," *id.* at 462. *Parrott* applied that to jurisdiction itself: request two days early, clerk filed one day late, no Rule 606(c) motion ever filed, and the court held the distinction from *Sanders* "one without legal significance" and reached the merits. 2017 IL App (3d) 150545, ¶¶ 18, 20.

Appellant's showing is stronger at every point: eight days early rather than two, in writing rather than orally, delivered twice rather than once, with the completed notice enclosed. (Exs. A–B.) The unrepresented premise comes from the circuit court's own orders — "Defendant Proceeds Pro Se" on October 6, 2025 (Ex. V), and the June 17, 2026 order discharging the Public Defender *nunc pro tunc* to that date (Ex. O). The People cannot rely on that order and disclaim its effect. If those records mean what they say, Rule 606(a) governs. If the People contend they do not, the People are describing a record requiring Rule 329 correction before it can be used against Appellant on any question.

The balance of this memorandum addresses what the appeal is about, and why the order under review cannot be permitted to execute while it stands unexplained.

**II. Two figures end the financial allegation**

The Financial Sentencing Order entered September 8, 2025 carries **no restitution figure**. Its paragraph 7(a) — “Restitution (See separate Restitution Order for details)” — is blank. (Ex. I-3.) It is blank because the principal property loss had already been paid: Allstate paid \$16,557.00 on Claim No. 0670868884 before sentencing. (Ex. S.)

The separate Restitution Order sets \$2,670.86 payable to a secondary claimant through the Circuit Clerk's office. (Ex. I-2.) By the sentencing order's own terms that sum is payable “in equal monthly installments by the first of each month **to be paid in full not later than 90 days before the termination date.**” Condition 32 fixes termination at **March 7, 2028**. The full-payment date is therefore **December 8, 2027**. (Ex. I.)

The petition was sworn on May 14, 2026. It alleges that Appellant “willfully failed to pay court ordered financial obligations.” It does not identify an obligation, an installment, an amount, or a due date — because there was none. It was filed one year, six months, and twenty-four days before the first date on which anything was due in full.

The remaining figures point the same direction. The court's own order states the total balance as **\$2,251.00**, of which **\$1,500.00** is a probation fee of \$50 per month accruing across thirty months. (Ex. I-3.) The county's own filing of November 10, 2025 — an AOIC form signed by the Director of Court Services — records that supervision was “transferred from Lake County and accepted by Cook County as of 10/1/2025” and that “[t]he defendant is in arrears **\$100.00** to Lake County.” (Ex. X.) Six months later the State swore that the nonpayment was willful.

### **III. A solvent insurer tried to pay and could not get an answer**

On July 20, 2026 Allstate Fire and Casualty filed a six-page response with the Illinois Department of Insurance in Complaint No. 01124092, which the Department transmitted to Appellant on July 23. (Exs. S, T.) The statements were made to a state regulator, under a response deadline, by a company defending its own conduct:

“Allstate **retained defense counsel** upon receipt of the DOI Complaint to see if counsel could reach out to the State’s Attorney and the public defender to resolve this for Mr. Allababidi, but **no one will respond or cooperate.**”

“Allstate is **not unwilling still to take care of this payment** if it can ... Allstate’s counsel has **not been able to reach the State’s Attorney** to see if it could even pay this and make this right.”

“**No one from the State Attorney’s Office will give any information to Allstate or its counsel.**”

“Allstate is aware that in some instances the State’s Attorney is **not willing to accept payment from any insurance company**, in lieu of a personal payment from defendant.”

“Allstate **cannot determine when the payment was due**. The Insured **may still have time** because his probation was for 30 months.”

Section 5-6-4(d) asks whether the failure to pay was “due to his willful refusal to pay.” A third party with \$100,000 in property damage limits retained counsel for the single purpose of paying \$2,670.86, and could not obtain a response from the State's Attorney's office or the Public Defender. Whatever else this record shows, it cannot show that the money's absence was attributable to any refusal by Appellant. On the insurer's own account, the refusal was on the other side of the caption.

The sum at issue is two thousand six hundred seventy dollars and eighty-six cents. The consequence the State sought and obtained is one hundred eighty days in jail and the forfeiture of a bargained-for reduction of a felony to a misdemeanor. *Bearden* exists to require an inquiry before that trade is made. No inquiry was made.

#### IV. The State cleared the drug test in writing, then swore the opposite

In November 2025 Appellant submitted to a screen through Cook County Adult Probation, the office then supervising him. The screen detected amphetamine, which is what a screen detects in a patient taking lawfully prescribed Adderall. The supervising officer adjudicated the result in writing:

“You will NOT have to drug test this time, since your drug test results were all negative.”

*Adison Weeks, Cook County Adult Probation — email of December 8, 2025, 12:14 p.m. (S.R. Ex. W.)*

“Your drug test results were positive for amphetamine, **but it is all negative in my eyes because I know you are still taking the Adderall.**”

*Adison Weeks, Cook County Adult Probation — email of December 10, 2025, 12:37 p.m. (S.R. Ex. W.)*

That is the supervising authority acknowledging the positive screen and adjudicating it compliant, in writing, in December 2025. Every enforcement document in this case postdates it. The April 8, 2026 memorandum that generated the petition reports the screen and never mentions the clearance. (Ex. U.) The petition sworn May 14, 2026 calls the same result “Amphetamine (**illegal substance**).” (Ex. J.)

And the condition the petition invokes does not say what the petition says it says. Condition 4 prohibits “any illegal substance **or prescription medication of another.**” (Ex. I.) The petition recites it as “The defendant shall not use any illegal substance.” (Ex. J.) The five omitted words are the entire allegation: a positive amphetamine screen from a man taking his own prescription is not the use of prescription medication of another.

Probation’s stated reason for treating the screen as a violation was that Appellant “has not provided an **updated** prescription.” (Ex. U.) That is answered inside the very exhibit that carries the clearance. The December 2025 correspondence encloses a photograph of the prescription bottle: Osco Drug RX 2958465, in Appellant’s name, “Amphetamine-Dextroamphetamine 30 MG,” prescribed twice daily for attention-deficit hyperactivity disorder, **filled November 23, 2025** — three days after the screen the petition calls an illegal substance. (Ex. W.) The updated prescription probation reported had not been provided was provided, to the officer who requested it, in the same exchange in which she wrote that the result was “all negative in my eyes.”

#### V. The petition misstates the order it enforces

The comparison below sets the sentencing order of September 8, 2025 beside the verified petition of May 14, 2026. Both are in the record. The quotations are verbatim.

| September 8, 2025 sentencing orders (Exs. I, I-2, I-3)                                                                                                                                                                                                                                      | May 14, 2026 verified petition (Ex. J)                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Financial Sentencing Order, ¶ 7(a).</b> The line “Restitution (See separate Restitution Order for details)” is <b>left blank</b> . No restitution figure is carried into the financial judgment. The principal property loss had already been paid: \$16,557.00 on Claim No. 0670868884. | <b>Petition ¶ 3.A.</b> “The defendant <b>willfully failed to pay</b> court ordered financial obligations.” The petition names no obligation, no installment, no amount, and no due date. |

| September 8, 2025 sentencing orders (Exs. I, I-2, I-3)                                                                                                                                                                                                                                              | May 14, 2026 verified petition (Ex. J)                                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Condition 2.</b> Financial obligations are payable “in equal monthly installments by the first of each month <b>to be paid in full not later than 90 days before the termination date.</b> ” Condition 32 fixes termination at <b>March 7, 2028</b> . The full-payment date is December 8, 2027. | The petition was filed <b>May 14, 2026</b> — one year, six months and twenty-four days before the earliest date any financial obligation came due under the order it purports to enforce.                                                           |
| <b>Financial Sentencing Order, ¶ 7(b).</b> The single largest item is a probation fee of <b>\$50 per month for 30 months</b> — an obligation that by its terms accrues monthly and cannot be due in full at any point before the term ends.                                                         | <b>April 8, 2026 memorandum</b> recites a lump “\$2,531.00 in court cost and fees.” The court’s own order states the total balance as <b>\$2,251.00</b> . The two figures do not agree.                                                             |
| <b>Condition 4.</b> “Not use or be in possession of any illegal substance <b>or prescription medication of another</b> ” ...                                                                                                                                                                        | <b>Petition ¶ 2.B.</b> recites the condition as “The defendant shall not use any illegal substance.” The five words that decide this allegation are gone.                                                                                           |
| <b>Condition 19.</b> “Defendant shall perform <b>240</b> hours of public service at a minimum rate of <b>12</b> hours per month ... and shall serve ... written evidence of completion ... <b>at least 90 days prior to the termination of this sentence.</b> ”                                     | <b>Petition ¶ 2.D.</b> recites “a minimum rate of <b>20 hours per month.</b> ” The State inflated the monthly rate by two-thirds in a sworn instrument. <b>¶ 3.D</b> then charges failure to prove a 240-hour total not due until December 8, 2027. |
| <b>Condition 30.</b> “Should the Defendant have no violations during his probation, then the plea of guilty to Count 1 ... (Class 4), <b>shall be amended to a Reckless Driving (Class A) misdemeanor.</b> ”                                                                                        | The relief the State obtained on an oral motion destroys the consideration Appellant bargained for. The exposure is 180 days <b>and</b> a felony conviction the plea agreement said would be reduced.                                               |

The public-service discrepancy is arithmetical and therefore not arguable. Condition 19 requires 240 hours “at a minimum rate of **12** hours per month.” The petition recites “a minimum rate of **20** hours per month.” The State inflated the required monthly rate by two-thirds in a sworn instrument. At the order’s actual rate, eight months of probation had accrued an expectation of ninety-six hours — and the order does not require proof of the total until ninety days before termination in any event.

## VI. The petition also diverges from the file it was built on

| The State’s own file (Exs. U, W, X)                                                                                                                                                                                          | May 14, 2026 verified petition and notice (Exs. J, J-2)                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>December 8 and 10, 2025.</b> The supervising officer adjudicated the screen in writing: “it is all negative in my eyes because I know you are still taking the Adderall.” (Ex. W.)                                        | <b>Petition ¶ 3.B</b> swears the defendant “tested positive for Amphetamine ( <b>illegal substance</b> ).” The April 8 memorandum that fed the petition does not mention the clearance.              |
| <b>April 8, 2026 memorandum:</b> “Defendant tested positive for Amphetamines on <b>11/20/25</b> . Defendant has not provided an <b>updated prescription.</b> ”                                                               | <b>Petition ¶ 3.B:</b> “on or about <b>11/10/2025.</b> ” Ten days apart, from the same file, for the same test.                                                                                      |
| <b>November 10, 2025 AOIC fee notification:</b> supervision “transferred from <b>Lake</b> County and accepted by <b>Cook</b> County as of 10/1/2025”; “The defendant is in arrears <b>\$100.00</b> to Lake County.” (Ex. X.) | <b>Petition ¶ 3.C</b> alleges failure to report to Lake County probation on five 2026 dates. The petition never discloses that supervision had been transferred to Cook County seven months earlier. |
| <b>April 8, 2026 memorandum</b> distribution line: “COPY: Judge / <b>Defense Attorney</b> / Probation File.”                                                                                                                 | <b>State’s notice, May 14, 2026:</b> the line “ <b>Attorney:</b> ” is <b>blank</b> . The State served no defense counsel.                                                                            |

The reporting allegation deserves separate mention. Paragraph 3.C charges failure to report to Lake County probation on five dates in February and March 2026. The county’s own November 10, 2025 filing records that supervision had been transferred to **Cook County** effective October 1, 2025. (Ex. X.) The petition

never discloses the transfer.

Section 5-6-4(a) requires violation proceedings to be initiated by petition. A petition that misdates its only scientific allegation by ten days, that calls willful a nonpayment its own source documents put at \$100.00 and not yet due, that misquotes two conditions of the order it enforces, and that omits the transfer of supervision underlying its reporting counts, is not an instrument on which imprisonment may be ordered without a hearing. These discrepancies need not be resolved today. They need to be tested — which is what section 5-6-4(c) is for, and what never happened.

## VII. No violation has ever been adjudicated

Section 5-6-4(b) directs that “[t]he court shall conduct a hearing of the alleged violation.” Section 5-6-4(c) places on the State “the burden of going forward with the evidence and proving the violation by the preponderance of the evidence.” Section 5-6-4(e) authorizes disposition only “if the court finds that the offender has violated a condition.”

The May 28, 2026 event is captioned “Arraignment On Petition To Revoke.” Its minutes list as present the judge, an assistant State's Attorney, an ECR specialist, and a probation officer. Appellant is not listed. No defense counsel is listed. The entire disposition reads: “Case Called” and “Issue Warrant.” (Ex. K.) No arraignment occurred. No plea or denial was entered.

The June 17, 2026 event is captioned “Status.” Its minutes record an oral motion, marked granted. No evidence, no witness, no stipulation, no admission, no finding. (Ex. M.) The written order is one sentence. (Ex. N.) The State's petition prayed that the court “lift the stay on any jail sentence previously imposed.” The State obtained exactly that, without ever proving the petition, and the petition remains undetermined today.

## VIII. Nobody can say from this file whether he had a lawyer

|                                              |                                                                                                                 |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| October 6, 2025 — minutes (Ex. V)            | “Defendant Proceeds Pro Se.” Reporter of record: <b>Mary K. Herbst</b> . Cause continued to <b>03/07/2028</b> . |
| April 8, 2026 — probation memorandum (Ex. Z) | Directs a copy to “ <b>Defense Attorney</b> .”                                                                  |
| May 14, 2026 — State’s notice (Ex. J-2)      | The “Attorney:” line is <b>blank</b> .                                                                          |
| May 28, 2026 — warrant (Ex. L)               | Bears the notation “ <b>PD APPOINTED</b> .”                                                                     |
| June 8, 2026 — Clerk’s office (Ex. Y)        | “the motion <b>must be filed by your attorney</b> . I would reach out to your public defender.”                 |
| June 17, 2026 — minutes (Ex. M)              | List “ <b>Bailey Russell, Public Defender</b> ” as present.                                                     |
| June 17, 2026 — order, 2:50 p.m. (Ex. O)     | “discharged as attorney of record ... <b>Nunc pro tunc to October 6, 2025</b> .”                                |

Read one way, Appellant has been unrepresented since October 6, 2025. On that reading he faced the issuance of a custodial warrant on May 28 and the activation of 180 days of imprisonment on June 17 without counsel, and no Rule 401(a) admonition or waiver appears anywhere in this record. A suspended sentence may not be activated against a defendant who was denied “the guiding hand of counsel.” *Alabama v. Shelton*, 535 U.S. 654, 674 (2002). Counsel is required where sentence is imposed following probation. *Mempa v. Rhay*, 389 U.S. 128, 137 (1967). Before revocation the probationer “must be advised of his right to counsel.” *Fischer*, ¶ 43

(citing *Barker*, 62 Ill. 2d at 59). Rule 401(a) forbids a court to “permit a waiver of counsel by a person accused of an offense punishable by imprisonment” without admonitions delivered personally in open court.

Read the other way, the Public Defender was present on June 17 as the minutes state. On that reading, counsel of record stood by while a jail term was activated by oral motion at a status call with no evidence taken — and the same afternoon the court discharged that counsel retroactively to a date eight months earlier.

The retroactivity cannot stand on this record either way. A *nunc pro tunc* order is confined to “incorporating into the record something which was actually previously done by the court but inadvertently omitted by clerical error,” and it “may not be used for supplying omitted judicial action, or correcting judicial errors under the pretense of correcting clerical errors.” *People v. Melchor*, 226 Ill. 2d 24, 32 (2007). The June 17, 2026 order reaches back to October 6, 2025. But the same court appointed the Public Defender by the warrant it issued on May 28, 2026 — seven months after the date to which the discharge was made retroactive — and probation directed a copy of its April 8, 2026 memorandum to a “Defense Attorney.” An order cannot memorialize as already-done an act the court’s own later records contradict.

Meanwhile the Clerk’s office told Appellant in writing, on June 8, 2026, that his motion “must be filed by your attorney” and that he should “reach out to your public defender.” (Ex. T.) He had no public defender to reach out to; the same office would be discharged *nunc pro tunc* nine days later. A rule that a self-represented criminal defendant’s motions will be accepted only from a lawyer he does not have is a rule that his motions will not be accepted.

## **IX. What the People will argue, and why it fails**

The People will cite *Foutch v. O’Bryant*, 99 Ill. 2d 389, 391–92 (1984), for the proposition that gaps in the record are resolved against the appellant. *Foutch* disposes of an appellant who did nothing to obtain a record. This one identified the four proceedings by date and capture method, completed the official Illinois Courts forms, served separate Rule 608 notices on the clerk and the reporting administrator, invoked Rule 607 in the circuit court on July 23, demanded preservation of the ECR source media, assembled a certified Rule 328 record, and moved in this Court before briefing. *People v. Banks*, 378 Ill. App. 3d 856, 861 (2d Dist. 2007), confirms that the cost falls on the State once indigency is shown. The reason there is no transcript is that no office has produced one, and the reason there are no findings is that none were made. *Foutch* does not convert an office’s nonperformance into an appellant’s forfeiture.

The People may also say that a warrant needs only probable cause, not a hearing. Appellant does not contend otherwise. He contends what *Franks v. Delaware*, 438 U.S. 154 (1978), addresses: that the showing was built on a sworn statement its maker made while the State’s file held the officer’s written clearance of the central allegation. Excise the two sworn predicates the State’s own records refute, and what remains is a reporting lapse in a county that no longer held supervision.

## **X. Relief**

Appellant does not ask this Court to decide today that no violation occurred, or to resolve the amphetamine question, or to adjudicate any insurer’s obligations. He asks it to hold that 180 days of imprisonment will not be executed while all of the following are true on the face of the record:

1. the petition that sought this relief has never been heard, and no order adjudicates it;

2. the order that granted it recites no violation, no evidence, no burden, and no finding of willfulness;
3. the Financial Sentencing Order carries no restitution figure, and the principal loss was paid in full by an insurer before sentencing;
4. nothing the petition charges was due until December 8, 2027, nineteen months after it was filed;
5. the supervising officer cleared the drug allegation in writing five months before the State swore to it, and the memorandum that fed the petition omitted the clearance;
6. the petition misquotes the public-service rate, omits five decisive words from condition 4, misdates the screen by ten days, and never discloses that supervision had moved to another county;
7. a solvent insurer stated to a state regulator that it retained counsel to pay and could not obtain a response; and
8. the file cannot establish whether Appellant had a lawyer on the day his liberty changed.

Each proposition is documentary. Not one depends on Appellant's credibility, and every one can be checked against the exhibit cited for it. The remedy for a record in this condition is a stay, a certified transcript, and a hearing that complies with section 5-6-4.

### **Verification**

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), I certify that the statements set forth in this instrument are true and correct, except as to matters stated on information and belief, and as to those matters I certify that I verily believe them to be true. Every description of a court record in this instrument is drawn from the document identified for it in the supporting record filed herewith.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI**

Defendant-Appellant, Pro Se

8516 W. Winona St., Chicago, Illinois 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: July 28, 2026

### **Certificate of compliance**

I certify that this memorandum conforms to the applicable form requirements of Illinois Supreme Court Rules 341(a) and 361(a): a proportionally spaced serif typeface on letter-sized pages, margins of at least three-quarters of an inch, sequential page numbering, and fewer than 6,000 words exclusive of the caption, tables, signature block, and this certificate.



IN THE APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,  
*Plaintiff-Appellee,*

v.

EHAB ALLABABIDI,  
*Defendant-Appellant, Pro Se.*

APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT

Appeal No. **2-26-0352**

Appeal from the Circuit Court of  
Lake County, No. **23 CF 1146**

The Honorable Christopher R. Stride,  
Judge Presiding

**PROPOSED ORDER ON OMNIBUS EMERGENCY MOTION**

*Proposed order — four heads of relief, one instrument*

**DISPOSITION:** [ ] ALLOWED [ ] DENIED [ ] ALLOWED IN PART / MODIFIED AS STATED  
BELOW

This cause coming on Defendant-Appellant's Omnibus Emergency Motion, the Court having considered the motion, the supporting memorandum, and the Rule 328 supporting record, and being fully advised, IT IS ORDERED:

**I. Jurisdiction**

- Appellant delivered a written request to appeal to the Clerk of the Circuit Court of Lake County on July 9, 2026, within thirty days of the June 17, 2026 order, at a time when the circuit court's own orders record him as unrepresented. Under Rule 606(a) the notice file-stamped July 23, 2026 stands as timely. To the extent leave is required, reasonable excuse is shown and leave is GRANTED under Rule 606(c) without refiling.

**II. Stay**

- The June 17, 2026 order lifting the stay of the 180-day Lake County Jail term is **STAYED** pending final disposition of this appeal or further order of this Court.
- Execution of the May 28, 2026 warrant is **STAYED / RECALLED** to the extent required to give effect to paragraph 2, subject to the following conditions:  
\_\_\_\_\_.
- Appellant shall remain at liberty on recognizance, subject to:  
\_\_\_\_\_.

**III. Counsel and transcript**

- On limited remand, the circuit court shall DETERMINE indigency under Rule 607(a) within three court days and transmit the written order to this Court the same day. This Court retains jurisdiction.



6. Upon a finding of indigency, qualified appellate counsel shall be APPOINTED immediately and identified to this Court, and the reports of proceedings shall be provided without charge under Rule 607(b).

#### IV. Record

7. The Clerk of the Appellate Court shall ISSUE the criminal docketing order forthwith.
8. All circuit-court, clerk, and court-reporting custodians shall PRESERVE within twenty-four hours every stenographic note, ECR or audio file, video-conference artifact, operator log, participant roster, timestamp, backup, and electronic-filing ingestion log associated with No. 23 CF 1146.
9. Within three business days the court-reporting administrator shall FILE a status identifying the responsible reporter or custodian for each appearance, the capture method, the existence and integrity of source media, and a date-certain production schedule. If any verbatim report is unavailable, a sworn declaration shall be filed in that period and an expedited Rule 323(c) or 323(d) schedule SET.
10. The May 28 and June 17, 2026 reports shall be TRANSCRIBED, CERTIFIED, and FILED within fourteen calendar days of the indigency finding; the complete Rule 608(a) reports no later than the Rule 608(b) deadline.
11. The Clerk of the Circuit Court shall PREPARE, INDEX, CERTIFY, and FILE the entire record no later than the Rule 608(c) deadline, shall include every July 9 and July 23, 2026 appeal-related instrument, and shall identify every instrument whose docket classification differs from the title on its face.
12. The circuit court shall CORRECT the record under Rule 329 to state accurately whether Appellant was represented by counsel on May 28 and June 17, 2026.
13. No merits-briefing deadline shall begin until the certified record is filed and appellate representation is resolved.

ENTERED: \_\_\_\_\_

JUSTICE

Prepared by: Ehab Allababidi, Defendant-Appellant, Pro Se

**IN THE APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT**

**PEOPLE OF THE STATE OF ILLINOIS,**  
*Plaintiff-Appellee,*

**V.**

**EHAB ALLABABIDI,**  
*Defendant-Appellant, Pro Se.*

APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT

Appeal No. **2-26-0352**

Appeal from the Circuit Court of  
Lake County, No. **23 CF 1146**

The Honorable Christopher R. Stride,  
Judge Presiding

**NOTICE OF RELATED AND PRIOR APPELLATE PROCEEDINGS**

*Second District Local Rule 113 — complete disclosure*

Five Illinois Supreme Court matters were filed and denied; two United States Supreme Court matters were docketed. This statement fixes exactly what each matter placed before a reviewing court, so that no party can blur distinct orders, dates, or vehicles. None of them reached the merits of the June 17, 2026 order, because none of them could.

**Illinois Supreme Court**

|                   |                                                                                                                                                            |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>No. 132495</b> | <i>People v. Allababidi</i> — leave to appeal from Appeal No. 2-25-0440; denied January 28, 2026; mandate March 4, 2026. Predates the June 17, 2026 order. |
| <b>No. 133295</b> | <i>Allababidi v. Cartwright Weinstein</i> — Rule 381 matter filed June 18, 2026 concerning clerk and civil-filing issues; denied July 6, 2026.             |
| <b>No. 133301</b> | <i>Allababidi v. Stride</i> — Rule 383 supervisory matter filed June 23, 2026 concerning the June 17 custody and warrant issues; denied June 26, 2026.     |
| <b>No. 133342</b> | <i>Allababidi v. Shanes</i> — Rule 381 assignment matter filed July 6, 2026; denied July 16, 2026.                                                         |
| <b>No. 133389</b> | <i>Allababidi v. Shanes</i> — Rule 383 assignment, remote-appearance, and stay matter filed July 14, 2026; denied July 16, 2026.                           |

The four June and July 2026 matters ended in summary orders. A summary denial of supervisory relief decides no question presented here, and this Court's jurisdiction is unaffected by any of them.

**Supreme Court of the United States**

|                    |                                                                                                                                                                                                                              |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>No. 26-5055</b> | <i>Allababidi v. Illinois</i> — docketed July 10, 2026. Arises from Appeal No. 2-25-0440 and does not concern the June 17, 2026 order.                                                                                       |
| <b>No. 25A1406</b> | <i>Allababidi v. Junkin, et al.</i> — emergency application submitted June 10, 2026, docketed June 17, 2026, denied June 22, 2026. Submitted before the challenged order was entered; it could not have sought review of it. |

**Earlier direct appeal**

Second District No. 2-25-0440 was dismissed November 17, 2025 for failure to comply with Rule 604(d) following the negotiated plea. This appeal is distinct. It challenges the June 17, 2026 postjudgment order

activating the stayed jail term, and the relief sought would leave the plea judgment undisturbed.

### Related proceedings in other forums

|                                    |                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>N.D. Ill. No. 1:25-cv-15800</b> | <i>Allababidi v. Advocate Health and Hospitals Corp., et al.</i> — civil action under 18 U.S.C. § 1962, Hon. Jorge L. Alonso. Disclosed for completeness; it seeks no relief touching any state proceeding and cannot supply the relief sought here.                                                                                       |
| <b>N.D. Ill. No. 1:26-cv-06738</b> | <i>Allababidi v. Shepherd, et al.</i> — 42 U.S.C. § 1983 damages action against individual prosecutors, probation personnel, and clerk's-office employees. It seeks money damages only; it asks no federal court to enjoin, stay, or declare anything about any state proceeding, and it cannot supply the relief sought here.             |
| <b>IDOI Complaint No. 01124092</b> | Illinois Department of Insurance complaint against Allstate Fire and Casualty, closed July 23, 2026. Relevant here because the insurer's July 20, 2026 response, furnished through the Department, states that it retained counsel to pay the restitution and could not obtain a response from the State's Attorney's office. (Exs. S, T.) |

The sequence is disclosed in full because it establishes diligence: an unrepresented man under an outstanding custodial warrant sought review in every forum that would accept a filing, within days of each adverse event, for two straight months. This direct appeal is the first ordinary vehicle positioned to test the June 17, 2026 order on a certified record.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI**

Defendant-Appellant, Pro Se

8516 W. Winona St., Chicago, Illinois 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: July 28, 2026

IN THE APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,  
*Plaintiff-Appellee,*

v.

EHAB ALLABABIDI,  
*Defendant-Appellant, Pro Se.*

APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT

Appeal No. **2-26-0352**

Appeal from the Circuit Court of  
Lake County, No. **23 CF 1146**

The Honorable Christopher R. Stride,  
Judge Presiding

**SUPPORTING RECORD PURSUANT TO ILLINOIS SUPREME COURT RULE 328**

*In support of Appellant's emergency motions on timeliness, stay, counsel, and record production*

**VERIFICATION AND RULE 328 CERTIFICATION**

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), I, EHAB ALLABABIDI, Defendant-Appellant, Pro Se, certify that the copies of documents contained in this Supporting Record are true and correct copies of the documents in the trial court record and in the files maintained in my possession; that each is what the exhibit cover preceding it states it to be; that where fewer than all pages of a document are reproduced, the cover for that exhibit discloses the pages selected; that no page has been altered other than by the addition of the exhibit cover and the sequential Bates footer; and that this record is submitted in support of the emergency motions filed herewith pursuant to Illinois Supreme Court Rules 328 and 361.

/s/ Ehab Allababidi

**EHAB ALLABABIDI**

Defendant-Appellant, Pro Se

8516 W. Winona St., Chicago, Illinois 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: July 28, 2026

|                           |                                                                                                                |
|---------------------------|----------------------------------------------------------------------------------------------------------------|
| <b>Appeal</b>             | No. 2-26-0352, Appellate Court of Illinois, Second District                                                    |
| <b>Circuit court</b>      | Nineteenth Judicial Circuit, Lake County, No. 23 CF 1146 (23CF00001146)                                        |
| <b>Order under review</b> | Order entered June 17, 2026, file-stamped June 18, 2026, lifting the stay of the 180-day Lake County Jail term |
| <b>Exhibits</b>           | 29, lettered A through Z                                                                                       |
| <b>Pagination</b>         | Sequential Bates numbering in the form SR-000001 at the foot of every page                                     |

## INDEX TO THE SUPPORTING RECORD

| Ex.        | Document                                                                             | Source                             | Pages |
|------------|--------------------------------------------------------------------------------------|------------------------------------|-------|
| <b>A</b>   | July 9, 2026 amended Rule 606(a) written request and tendered notice of appeal       | Transmitted packet                 | 3–12  |
| <b>B</b>   | Transmission-history export — July 9, 2026 deliveries to the circuit clerk           | Device transmission log            | 13–15 |
| <b>C</b>   | July 11, 2026 tracked-mail acceptance receipt                                        | Carrier receipt                    | 16–17 |
| <b>D</b>   | Carrier tracking record — the June certified article that was never delivered        | Carrier tracking page              | 18–19 |
| <b>E</b>   | Mailbox retrieval record — electronic delivery confirmation                          | Mailbox retrieval                  | 20–21 |
| <b>F</b>   | July 23, 2026 file-stamped renewed Rule 606(a) request to appeal                     | Circuit court filing               | 22–25 |
| <b>G</b>   | July 23, 2026 file-stamped notice of appeal                                          | Circuit court filing               | 26–28 |
| <b>H</b>   | Second District notice docketing Appeal No. 2-26-0352                                | Appellate court notice             | 29–30 |
| <b>I</b>   | September 8, 2025 Order and Certificate of Felony Probation                          | Sentencing order (pp. 1, 3, 5)     | 31–34 |
| <b>I-2</b> | September 8, 2025 Order for Restitution                                              | Sentencing order                   | 35–36 |
| <b>I-3</b> | September 8, 2025 Financial Sentencing Order                                         | Sentencing order                   | 37–39 |
| <b>J</b>   | May 14, 2026 verified petition for revocation of probation                           | State's charging instrument        | 40–42 |
| <b>J-2</b> | May 14, 2026 notice of motion on the petition for revocation                         | State's notice                     | 43–44 |
| <b>K</b>   | May 28, 2026 court minutes — arraignment on petition to revoke                       | Circuit court minutes              | 45–46 |
| <b>L</b>   | May 28, 2026 warrant of arrest — violation                                           | Circuit court warrant              | 47–49 |
| <b>M</b>   | June 17, 2026 court minutes                                                          | Circuit court minutes              | 50–51 |
| <b>N</b>   | June 17, 2026 order lifting the stay of the 180-day jail term                        | Order appealed from                | 52–53 |
| <b>O</b>   | June 17, 2026 order discharging the Public Defender nunc pro tunc to October 6, 2025 | Circuit court order                | 54–55 |
| <b>P</b>   | July 23, 2026 file-stamped Rule 609(a) motion in the circuit court                   | Circuit court filing               | 56–64 |
| <b>Q</b>   | July 23, 2026 file-stamped Rule 607 motion in the circuit court                      | Circuit court filing               | 65–68 |
| <b>R</b>   | July 23, 2026 notice of the August 6, 2026 court date                                | Circuit court notice               | 69–71 |
| <b>S</b>   | Allstate response to Illinois Department of Insurance Complaint No. 01124092         | Insurer regulatory filing          | 72–78 |
| <b>T</b>   | Illinois Department of Insurance transmittal — Complaint No. 01124092                | State regulator letter             | 79–81 |
| <b>U</b>   | April 8, 2026 Adult Probation violation memorandum                                   | Probation department record        | 82–83 |
| <b>V</b>   | October 6, 2025 court minutes — the date to which counsel was discharged             | Circuit court minutes              | 84–85 |
| <b>W</b>   | December 8 and 10, 2025 correspondence of the supervising probation officer          | Supervising officer correspondence | 86–91 |
| <b>X</b>   | November 10, 2025 Adult Notification of Changes to the Probation Fee Schedule        | AOIC form, filed                   | 92–94 |
| <b>Y</b>   | June 8, 2026 written refusal by the Office of the Circuit Clerk                      | Clerk's office correspondence      | 95–96 |
| <b>Z</b>   | USPS Office of Inspector General referral — routing memorandum                       | Referral memorandum, July 28, 2026 | 97–98 |

# EXHIBIT A

## JULY 9, 2026 AMENDED RULE 606(A) WRITTEN REQUEST AND TENDERED NOTICE OF APPEAL

### WHAT THIS EXHIBIT ESTABLISHES

*The written request itself. It identifies the case and the June 17 order, invokes Rule 606(a) by name, directs the clerk to prepare, sign, and file the notice, and encloses a completed notice of appeal. Nine pages, transmitted July 9, 2026.*

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Transmitted packet                                                                                                                     |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

# AMENDED / CORRECTED FAX — USE THIS VERSION

People v. Allababidi, No. 23 CF 1146 (Circuit Court of Lake County, 19th Judicial Circuit)

Correction of submission-method wording — Rule 606(a) written request served by email/fax

## AMENDED / CORRECTED FAX

This packet supersedes the earlier same-date fax as to method-of-submission wording.

**AMENDED / CORRECTED FAX - USE THIS VERSION.**

|                  |                                                                                                           |
|------------------|-----------------------------------------------------------------------------------------------------------|
| <b>TO:</b>       | Erin Cartwright Weinstein, Clerk of the Circuit Court of Lake County                                      |
| <b>ATTN:</b>     | Criminal Division supervisor on duty                                                                      |
| <b>FAX:</b>      | (847) 984-5873                                                                                            |
| <b>EMAIL:</b>    | CircuitClerk@lakecountyil.gov                                                                             |
| <b>CC:</b>       | Chief Judge / Court Administration; Appellate Court Clerk; Lake County State's Attorney                   |
| <b>FROM:</b>     | EHAB ALLABABIDI, Pro Se — 8516 W. Winona St., Chicago, IL 60656 — (773) 920-0030 — defcon5ready@gmail.com |
| <b>DATE:</b>     | July 9, 2026                                                                                              |
| <b>RE:</b>       | Amended/corrected fax regarding Rule 606(a) Notice of Appeal submission method                            |
| <b>CASE:</b>     | People v. Allababidi, No. 23 CF 1146                                                                      |
| <b>DEADLINE:</b> | Rule 606(b) notice-of-appeal period ends July 17, 2026                                                    |
| <b>ENCL:</b>     | Correction notice; corrected full packet: FAX_01_CIRCUIT-CLERK_Rule606a_Written_Request.pdf               |
| <b>PAGES:</b>    | 9 (including this cover page)                                                                             |

## SUMMARY OF THIS AMENDED TRANSMISSION

*This amended fax corrects one factual phrasing issue in the earlier same-date fax: the Notice of Appeal and Rule 606(a) written request were served on the Circuit Clerk by email and fax, because the criminal case is not available for ordinary e-filing by the undersigned. The requested ministerial action is unchanged.*

**AMENDED / CORRECTED FAX TRANSMITTAL**  
***Correction concerning method of submission in People v. Allababidi, No. 23 CF 1146***

To: Erin Cartwright Weinstein, Clerk of the Circuit Court of Lake County; Criminal Division supervisor

---

**CORRECTION AND REASON FOR THIS AMENDED FAX**

This amended fax corrects and supersedes the same-date transmittal identified below **only to the extent** the earlier wording could be read to state that the Notice of Appeal or Rule 606(a) written request was e-filed into Lake County criminal case No. 23 CF 1146. That is not the intended representation.

**Correction:** Lake County criminal case No. 23 CF 1146 is not available for ordinary e-filing by the undersigned. The operative submission was service by **email and fax** to the Circuit Clerk of the Notice of Appeal and the written Rule 606(a) request. Under Rule 606(a), when an unrepresented defendant requests in writing that he wishes to appeal, the trial-court clerk “must forthwith prepare, sign, and file a notice of appeal for the defendant”.

**Unchanged:** The requested ministerial action remains the same: process the emailed/faxed Rule 606(a) written request and Notice of Appeal, prepare/sign/file the notice as Rule 606(a) directs, and transmit it under Rule 606(b).

**Amended packet attached:** A corrected full copy of FAX\_01\_CIRCUIT-CLERK\_Rule606a\_Written\_Request.pdf follows this correction notice. Please use the attached corrected packet in place of the earlier faxed copy for any statement concerning the method of submission.

---

**PRIOR TRANSMISSION BEING CORRECTED**

Earlier same-date FAX\_01 Rule 606(a) written request to appeal.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI, Pro Se**

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: July 9, 2026



# FACSIMILE / WRITTEN TRANSMITTAL — July 9, 2026

People v. Allababidi, No. 23 CF 1146 (Circuit Court of Lake County, 19th Judicial Circuit)

Appeal of right from the June 17, 2026 order (Rule 604(b)) — Rule 606(b) deadline July 17, 2026

## RULE 606(a) WRITTEN REQUEST TO APPEAL — CLERK'S NONDISCRETIONARY DUTY

Written request of an unrepresented defendant that the clerk prepare, sign, and file a Notice of Appeal forthwith — with the completed Rule 606(d) form enclosed

**TIME-SENSITIVE: 30-DAY JURISDICTIONAL PERIOD ENDS July 17, 2026**

|                  |                                                                                                                                                                      |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>TO:</b>       | Erin Cartwright Weinstein, Clerk of the Circuit Court of Lake County<br>Criminal Division, 18 N. County St., Waukegan, IL 60085                                      |
| <b>ATTN:</b>     | Criminal Division supervisor on duty                                                                                                                                 |
| <b>FAX:</b>      | (847) 984-5873 (19th Judicial Circuit)                                                                                                                               |
| <b>EMAIL:</b>    | CircuitClerk@lakecountyil.gov                                                                                                                                        |
| <b>CC:</b>       | Chief Judge (fax (847) 984-5626; dshanes@lakecountyil.gov; courts@lakecountyil.gov); App. Ct. 2d Dist. Clerk (U.S. Mail); Lake SAO (statesattorney@lakecountyil.gov) |
| <b>FROM:</b>     | EHAB ALLABABIDI, Pro Se — 8516 W. Winona St., Chicago, IL 60656 — (773) 920-0030 — defcon5ready@gmail.com                                                            |
| <b>DATE:</b>     | July 9, 2026                                                                                                                                                         |
| <b>RE:</b>       | RULE 606(a) WRITTEN REQUEST TO APPEAL — nondiscretionary duty to prepare, sign, and file the Notice of Appeal for an unrepresented defendant                         |
| <b>CASE:</b>     | People v. Allababidi, No. 23 CF 1146 (19th Jud. Cir., Lake County) — related: Ill. S. Ct. Nos. 133295, 133301, 133342; N.D. Ill. Nos. 1:26-cv-06738, 1:26-cv-01077   |
| <b>DEADLINE:</b> | Rule 606(b) notice-of-appeal period ends July 17, 2026; response requested by July 13, 2026                                                                          |
| <b>ENCL:</b>     | (1) Notice of Appeal (Rule 606(d) form); (2) Appellate Court rejection notice, Envelope No. 38927349                                                                 |
| <b>PAGES:</b>    | 7 (including this cover page)                                                                                                                                        |

### SUMMARY OF THIS TRANSMISSION

*The Appellate Court, Second District, advised on July 9, 2026: “You must file your notice of appeal in the circuit court. Once you receive an appeal number, you may file your other documents into that appeal.” This transmittal is the operative act that rule contemplates: under Rule 606(a), upon an unrepresented defendant’s written request the clerk “must forthwith prepare, sign, and file a notice of appeal for the defendant”. Four ministerial acts are requested in Part III; written confirmation is requested by July 13, 2026. Because the criminal case is not available for ordinary e-filing, the request is served by email and fax; Rule 606(c) is the fallback if the notice is not processed.*

**RULE 606(a) WRITTEN REQUEST TO APPEAL AND REQUEST FOR MINISTERIAL FILING OF THE ENCLOSED NOTICE OF APPEAL**

To: Erin Cartwright Weinstein, Clerk of the Circuit Court of Lake County, and the supervisor on duty, Criminal Division

**I. WHAT THIS IS, AND THE RULE THAT GOVERNS IT**

I am the defendant in People v. Allababidi, No. 23 CF 1146. I have no attorney: the Public Defender was discharged on the record on June 17, 2026, at the same proceeding at which the stay of my 180-day jail term was lifted. I wish to appeal from that June 17, 2026 order. This letter is my **written request to appeal under Illinois Supreme Court Rule 606(a)**. That rule provides that when a defendant who does not have an attorney requests in writing that he wishes to appeal, “the clerk of the trial court must forthwith prepare, sign, and file a notice of appeal for the defendant”. The duty is the office’s own; it is ministerial; it requires no judge’s leave, no attorney, and no fee. To make performance mechanical, a completed Notice of Appeal in the form required by Rule 606(d) and the Article VI Forms Appendix is enclosed as Enclosure 1 — the office may file it as tendered or prepare, sign, and file its own to the same effect.

The Appellate Court, Second District, has already fixed the route. Its rejection notice of July 9, 2026 (Envelope No. 38927349, Enclosure 2) states: “You must file your notice of appeal in the circuit court. Once you receive an appeal number, you may file your other documents into that appeal.” Every step of my appeal therefore now runs through this office’s intake. The 30-day jurisdictional period of Rule 606(b) ends **July 17, 2026**.

**THE RECORD, BY DATE (EACH ENTRY IS DOCUMENTED IN WRITING)**

**September 8, 2025.** Judgment: 30 months’ probation, 180-day Lake County Jail term stayed.

**December 10, 2025.** The supervising probation officer clears the amphetamine screen in writing: “Your drug test results were positive for amphetamine, but it is all negative in my eyes because I know you are still taking the Adderall.”

**May 14, 2026.** The State files a sworn Petition for Revocation alleging the same test as an “illegal substance” and willful nonpayment; no ability-to-pay inquiry precedes it.

**May 28, 2026.** No-bond arrest warrant issues; it remains outstanding.

**June 8, 2026.** The Circuit Clerk’s office refuses in writing to add a pro se motion to the call: “the motion must be filed by your attorney”.

**June 15, 2026.** A verified, file-stamped omnibus motion (including a motion to quash the warrant) is entered on the public docket as “Correspondence”; it has never been calendared or ruled upon.

**June 17, 2026.** At a status call: the Public Defender is discharged, the warrant is not quashed, and the stay of the 180-day jail term is lifted. The same day, the Clerk’s office rejects eFileIL Envelope No. 38550660.

**July 6, 2026.** The Supreme Court of Illinois denies leave in No. 133295 (discretionary original mandamus) without opinion; fee waivers on indigency were allowed June 25, 2026 (Nos. 133295,

133301).

**July 9, 2026.** The Appellate Court, Second District, rejects the appellate filings (Envelope No. 38927349, submitted 6:23 a.m., rejected 2:06 p.m.): “Wrong Court.” “You must file your notice of appeal in the circuit court. Once you receive an appeal number, you may file your other documents into that appeal.” A Notice of Appeal and Rule 606(a) written request are emailed and faxed to the Circuit Clerk the same day.

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## II. THE RULE 606(a) REQUEST HAS BEEN SERVED IN WRITING

Because Lake County criminal case No. 23 CF 1146 is not available for ordinary e-filing, this Notice of Appeal and Rule 606(a) written request are being served by email and fax to the Circuit Clerk. The operative point is the written request: Rule 606(a) provides that, when an unrepresented defendant requests in writing that he wishes to appeal, the trial-court clerk “must forthwith prepare, sign, and file a notice of appeal for the defendant”. If the office does not process the notice promptly, Rule 606(c) allows the Appellate Court to grant leave and direct transmission for filing on the documented record.

---

## III. THE FOUR MINISTERIAL ACTS REQUESTED

- (1) File the enclosed Notice of Appeal in No. 23 CF 1146 effective as of its July 9, 2026 tender — or prepare, sign, and file the office’s own notice under Rule 606(a), which this letter requires;
- (2) Docket it as a **Notice of Appeal — Criminal**, not as correspondence or any other classification;
- (3) Transmit a copy to the Clerk of the Appellate Court, Second District, within 5 days, as Rule 606(b) directs, and to the Lake County State’s Attorney under Rule 606(e); and
- (4) Confirm the filing and the transmission in writing to defcon5ready@gmail.com so the appellate stay motion can be filed into the new appeal number without delay.

---

## IV. PRESERVATION

Please preserve all Odyssey/eFileIL envelope records, audit logs, operator identifiers, classification histories, and correspondence concerning this case, including Envelope Nos. 38550660 and 38927349, together with today’s email/fax submissions. Those records are within the scope of the litigation hold previously served and of pending federal discovery in Allababidi v. Shepherd, No. 1:26-cv-06738 (N.D. Ill.). This letter asks for nothing except performance of ministerial duties the Supreme Court’s rules impose, and written confirmation that they have been performed.

---

## V. RESPONSE REQUESTED

Please respond by email to defcon5ready@gmail.com by **July 13, 2026**. If any part of this request is refused, please state the refusal and its asserted basis in writing; Rule 606(a) admits of none.

**cc (same date, by the means shown):** Office of the Chief Judge, 19th Judicial Circuit (fax (847) 984-5626; dshanes@lakecountyil.gov; courts@lakecountyil.gov); Clerk of the Appellate Court, Second District (U.S. Mail, 55 Symphony Way, Elgin, IL 60120); Lake County State’s Attorney (statesattorney@lakecountyil.gov)

**Enclosures:** (1) Notice of Appeal, People v. Allababidi, No. 23 CF 1146 (Rule 606(d) form, one page). (2) Appellate Court, Second District, rejection notice of July 9, 2026, Envelope No. 38927349 (two pages).

**VERIFICATION (735 ILCS 5/1-109; 28 U.S.C. § 1746).** Under penalties as provided by law, I certify that the factual statements above are true and correct to the best of my knowledge, and that enclosed documents are true and correct copies of what they purport to be.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI, Pro Se**

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: July 9, 2026

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS**

|                                                                                                                            |                                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>PEOPLE OF THE STATE OF ILLINOIS,</b><br><i>Plaintiff,</i><br><br>v.<br><br><b>EHAB ALLABABIDI,</b><br><i>Defendant.</i> | <b>No. 23 CF 1146</b><br><br>Circuit Court, 19th Judicial Circuit<br>Lake County, Illinois<br><br><b>Hon. Christopher R. Stride</b><br>Presiding Judge |
|----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|

**NOTICE OF APPEAL**

*(Enclosure 1 to the Rule 606(a) written request of July 9, 2026)*

Defendant-Appellant Ehab Allababidi appeals to the Appellate Court of Illinois, Second District, from the order described below:

**1. Court to which appeal is taken:**

Appellate Court of Illinois, Second District

**2. Name of appellant and address:**

Ehab Allababidi, 8516 W. Winona St., Chicago, IL 60656

**3. Name and address of appellant's attorney on appeal:**

None — Appellant is self-represented (Public Defender discharged June 17, 2026); appointment of counsel on appeal is requested under Ill. S. Ct. Rule 607(a)

**4. Date of the judgment or order appealed from:**

June 17, 2026

**5. Offense of which convicted:**

Aggravated reckless driving / bodily harm, Class 4 felony (625 ILCS 5/11-503(a)(1)) — Count 1, judgment of September 8, 2025, as reflected in the circuit court record

**6. Sentence:**

30 months' probation with a 180-day Lake County Jail term stayed; the stay was lifted by the order of June 17, 2026

**7. Nature of the order appealed from:**

Order and minute orders of June 17, 2026 lifting the stay of the 180-day jail term (an order modifying the conditions of, or revoking, a probation sentence, Ill. S. Ct. Rule 604(b)), declining to quash the outstanding arrest warrant, and discharging the Public Defender.

/s/ Ehab Allababidi

**EHAB ALLABABIDI**, Defendant-Appellant, Pro Se

8516 W. Winona St., Chicago, IL 60656 | (773) 920-0030 | defcon5ready@gmail.com

Dated: July 9, 2026



Ehab Hilfiger <ehabhilfiger@gmail.com>

Filing Rejected for Envelope Number: 38927349 in Case: 38927349, for filing Docketing Statement (Fee Waived)

1 message

no-reply@efilingmail.tylertech.cloud <no-reply@efilingmail.tylertech.cloud> Thu, Jul 9, 2026 at 2:06 PM  
To: ehabhilfiger@gmail.com

Filing Rejected

EFile State Logo

Envelope Number: 38927349  
Case Number: 38927349  
Case Name:

The document below has been rejected for the reason(s) stated. Please correct and resubmit. If the corrected document will be late, [Illinois Supreme Court Rule 9](#) permits you to file a motion asking the court to treat the corrected document as filed on the date/time it was originally submitted. If you intend to do so, you must file that motion within 5 court days of this notice.

If you need further information, contact the [court clerk](#).

|                                         |  |                                |
|-----------------------------------------|--|--------------------------------|
|                                         |  |                                |
| Rejection Reason(s) from Clerk's Office |  |                                |
|                                         |  |                                |
| Court                                   |  | Appellate Court – 2nd District |
|                                         |  |                                |
| Rejection Reason                        |  | Wrong Court.                   |
|                                         |  |                                |

|                    |  |                                                                                                                                                    |
|--------------------|--|----------------------------------------------------------------------------------------------------------------------------------------------------|
| Rejection Comments |  | : You must file your notice of appeal in the circuit court. Once you receive an appeal number, you may file your other documents into that appeal. |
|                    |  |                                                                                                                                                    |
|                    |  |                                                                                                                                                    |

|                     |                                                                                                                                                                                                                              |  |
|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|                     |                                                                                                                                                                                                                              |  |
| Document Details    |                                                                                                                                                                                                                              |  |
|                     |                                                                                                                                                                                                                              |  |
| Case Number         | 38927349                                                                                                                                                                                                                     |  |
|                     |                                                                                                                                                                                                                              |  |
| Case Name           |                                                                                                                                                                                                                              |  |
|                     |                                                                                                                                                                                                                              |  |
| Date/Time Submitted | 7/9/2026 6:23 AM CST                                                                                                                                                                                                         |  |
|                     |                                                                                                                                                                                                                              |  |
| Filing Type         | EFile                                                                                                                                                                                                                        |  |
|                     |                                                                                                                                                                                                                              |  |
| Filing Description  | Docketing Statement (Criminal) pursuant to Illinois Supreme Court Rule 606(g) for a Rule 604(b) appeal of right from the Circuit Court of Lake County, case number 23 CF 1146, appealing the order entered on June 17, 2026. |  |
|                     |                                                                                                                                                                                                                              |  |
| Filing Code         | Docketing Statement (Fee Waived)                                                                                                                                                                                             |  |
|                     |                                                                                                                                                                                                                              |  |
| Filed By            | Ehab Allababidi                                                                                                                                                                                                              |  |
|                     |                                                                                                                                                                                                                              |  |
| Filing Attorney     |                                                                                                                                                                                                                              |  |
|                     |                                                                                                                                                                                                                              |  |
|                     |                                                                                                                                                                                                                              |  |

To learn how to copy the rejected filing so that you can make changes to refile, [click here](#).

If you are not represented by a lawyer, we want to improve your e-filing experience. Please [click here](#) to fill out a short

# EXHIBIT B

## TRANSMISSION-HISTORY EXPORT — JULY 9, 2026 DELIVERIES TO THE CIRCUIT CLERK

### WHAT THIS EXHIBIT ESTABLISHES

*Records both July 9, 2026 transmissions to the circuit clerk's published fax number (847) 984-5873 as Delivered: seven pages completing at 2:46 p.m., and nine pages completing at 3:14 p.m. Eight days before the Rule 606(b) deadline.*

### EXCERPT MAP — ORIGINAL PAGES REPRODUCED

| Orig. p. | What that page shows                                                                                                                 |
|----------|--------------------------------------------------------------------------------------------------------------------------------------|
| 4        | Transmission log entries for July 9, 2026, showing the seven-page packet to the clerk fax completing at 2:46 p.m., status Delivered. |
| 5        | Continuation of the same log, showing the nine-page amended packet to the same number completing at 3:14 p.m., status Delivered.     |

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Device transmission log                                                                                                                |
| PAGES          | Selected pages 4, 5 of the original                                                                                                    |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |



| Start Time               | Complete Time           | Status            | To Name                                | To Number         | Cover Included   |
|--------------------------|-------------------------|-------------------|----------------------------------------|-------------------|------------------|
| 10:25 PM CDT, 07/09/2026 | -                       | No answer         | Lake county foia                       | +1 (847) 360-9983 | No               |
| From Name                | From Org Name           | From Phone        | From Fax                               | From Email        | Total # of Pages |
| ehab                     |                         | +1 (773) 920-0030 |                                        |                   | 9 Pages          |
| Start Time               | Complete Time           | Status            | To Name                                | To Number         | Cover Included   |
| 3:12 PM CDT, 07/09/2026  | 3:15 PM CDT, 07/09/2026 | Delivered         | Chief judge shanes                     | +1 (847) 984-5626 | No               |
| From Name                | From Org Name           | From Phone        | From Fax                               | From Email        | Total # of Pages |
| ehab                     |                         | +1 (847) 984-5626 |                                        |                   | 7 Pages          |
| Start Time               | Complete Time           | Status            | To Name                                | To Number         | Cover Included   |
| 3:11 PM CDT, 07/09/2026  | 3:14 PM CDT, 07/09/2026 | Delivered         | Circuit clerk fax amended              | +1 (847) 984-5873 | No               |
| From Name                | From Org Name           | From Phone        | From Fax                               | From Email        | Total # of Pages |
| ehab                     |                         | +1 (773) 920-0030 |                                        |                   | 9 Pages          |
| Start Time               | Complete Time           | Status            | To Name                                | To Number         | Cover Included   |
| 3:01 PM CDT, 07/09/2026  | -                       | No answer         | Civil rights illinois attorney general | +1 (312) 814-3212 | No               |
| From Name                | From Org Name           | From Phone        | From Fax                               | From Email        | Total # of Pages |
| ehab                     |                         | +1 (773) 920-0030 |                                        |                   | 5 Pages          |
| Start Time               | Complete Time           | Status            | To Name                                | To Number         | Cover Included   |
| 2:59 PM CDT, 07/09/2026  | 3:01 PM CDT, 07/09/2026 | Delivered         | Appellate defender second district     | +1 (847) 695-8959 | No               |
| From Name                | From Org Name           | From Phone        | From Fax                               | From Email        | Total # of Pages |
| ehab                     |                         | +1 (773) 920-0030 |                                        |                   | 3 Pages          |
| Start Time               | Complete Time           | Status            | To Name                                | To Number         | Cover Included   |
| 2:55 PM CDT, 07/09/2026  | 2:57 PM CDT, 07/09/2026 | Delivered         | Lake county states attorney            | +1 (847) 360-0993 | No               |
| From Name                | From Org Name           | From Phone        | From Fax                               | From Email        | Total # of Pages |
| ehab                     |                         | +1 (773) 920-0030 |                                        |                   | 3 Pages          |

| Start Time              | Complete Time           | Status            | To Name                      | To Number         | Cover Included   |
|-------------------------|-------------------------|-------------------|------------------------------|-------------------|------------------|
| 2:53 PM CDT, 07/09/2026 | 2:54 PM CDT, 07/09/2026 | Delivered         | Deputy intake attorney       | +1 (847) 697-9824 | No               |
| From Name               | From Org Name           | From Phone        | From Fax                     | From Email        | Total # of Pages |
| ehab                    |                         | +1 (773) 920-0030 |                              |                   | 3 Pages          |
| Start Time              | Complete Time           | Status            | To Name                      | To Number         | Cover Included   |
| 2:51 PM CDT, 07/09/2026 | 2:53 PM CDT, 07/09/2026 | Delivered         | Circuit clerk fax 02         | +1 (847) 984-5873 | No               |
| From Name               | From Org Name           | From Phone        | From Fax                     | From Email        | Total # of Pages |
| ehab                    |                         | +1 (773) 920-0060 |                              |                   | 5 Pages          |
| Start Time              | Complete Time           | Status            | To Name                      | To Number         | Cover Included   |
| 2:49 PM CDT, 07/09/2026 | 2:52 PM CDT, 07/09/2026 | Delivered         | Court administration         | +1 (847) 984-5626 | No               |
| From Name               | From Org Name           | From Phone        | From Fax                     | From Email        | Total # of Pages |
| ehab                    |                         | +1 (773) 920-0030 |                              |                   | 5 Pages          |
| Start Time              | Complete Time           | Status            | To Name                      | To Number         | Cover Included   |
| 2:45 PM CDT, 07/09/2026 | 2:48 PM CDT, 07/09/2026 | Delivered         | Chief judge Shane's notice   | +1 (847) 984-5626 | No               |
| From Name               | From Org Name           | From Phone        | From Fax                     | From Email        | Total # of Pages |
| ehab                    |                         | +1 (773) 920-0030 |                              |                   | 7 Pages          |
| Start Time              | Complete Time           | Status            | To Name                      | To Number         | Cover Included   |
| 2:43 PM CDT, 07/09/2026 | 2:46 PM CDT, 07/09/2026 | Delivered         | Circuit clerk Lake county    | +1 (847) 984-5873 | No               |
| From Name               | From Org Name           | From Phone        | From Fax                     | From Email        | Total # of Pages |
| ehab                    |                         | +1 (773) 920-0030 |                              |                   | 7 Pages          |
| Start Time              | Complete Time           | Status            | To Name                      | To Number         | Cover Included   |
| 8:13 AM CDT, 07/09/2026 | 8:27 AM CDT, 07/09/2026 | Delivered         | Lake county sheriff's office | +1 (847) 984-5974 | No               |
| From Name               | From Org Name           | From Phone        | From Fax                     | From Email        | Total # of Pages |
| ehab                    |                         | +1 (773) 920-0030 |                              |                   | 26 Pages         |

# EXHIBIT C

JULY 11, 2026 TRACKED-MAIL ACCEPTANCE RECEIPT

**WHAT THIS EXHIBIT ESTABLISHES**

*Acceptance of the redundant paper packet at 9:30 a.m. on July 11, 2026, addressed to the Lake County Circuit Clerk. Corroborates diligence; the July 9 transmissions already fixed the operative date.*

**SOURCE AND AUTHENTICATION**

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Carrier receipt                                                                                                                        |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

 **UNITED STATES  
POSTAL SERVICE.**

HARWOOD HEIGHTS  
7101 W GUNNISON ST  
HARWOOD HEIGHTS, IL 60706-9998  
www.usps.com

07/11/2026 09:30 AM

TRACKING NUMBERS  
9402 6118 9876 5521 6068 11

TRACK STATUS OF ITEMS WITH THIS CODE  
(UP TO 25 ITEMS)



TRACK STATUS BY TEXT MESSAGE  
Send tracking number to 28777 (2USPS)  
Standard message and data rates may apply

TRACK STATUS ONLINE  
Visit <https://www.usps.com/tracking>  
Text and e-mail alerts available

PURCHASE DETAILS

| Product                     | Qty | Unit<br>Price | Price  |
|-----------------------------|-----|---------------|--------|
| Prepaid Mail                | 1   |               | \$0.00 |
| Waukegan, IL 60085          |     |               |        |
| Weight: 0 lb 14.00 oz       |     |               |        |
| Acceptance Date:            |     |               |        |
| Sat 07/11/2026              |     |               |        |
| Tracking #:                 |     |               |        |
| 9402 6118 9876 5521 6068 11 |     |               |        |
| Grand Total:                |     |               | \$0.00 |

TO REPORT AN ISSUE  
Visit <https://emailus.usps.com>

All hazardous labels/markings on reused boxes MUST be completely removed/obliterated if they no longer match the contents.

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USPS retail acceptance record: July 11, 2026 at 9:30 a.m.; 14.00 oz; addressed to Waukegan, Illinois 60085; Tracking 9402 6118 9876 5521 6068 11.

# EXHIBIT D

## CARRIER TRACKING RECORD — THE JUNE CERTIFIED ARTICLE THAT WAS NEVER DELIVERED

### WHAT THIS EXHIBIT ESTABLISHES

*Tracking No. 9402611898765528934061, the certified article carrying the paper copy of Appellant's 82-page omnibus filing addressed to the Clerk of the Circuit Court. The carrier's public trace ends at the Palatine distribution center on June 9, 2026 at 7:55 a.m., 'currently in transit to the destination.' It has never been delivered. It is included because the omnibus filing it carried is the filing the circuit docket recorded as 'Correspondence' and never calendared, and because the June 17 minutes state that the warrant it moved to quash 'WILL NOT BE QUASHED.'*

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Carrier tracking page                                                                                                                  |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

ALERT: IMPACTS FROM THE WORLD SOCCER TOURNAMENT HELD IN MAJOR CITIES THR...

USPS Tracking®

FAQs &gt;

Tracking Number:

Remove X

9402611898765528934061

Copy

Add to Informed Delivery

## Latest Update

Your item arrived at our USPS facility in PALATINE IL DISTRIBUTION CENTER on June 9, 2026 at 7:55 am. The item is currently in transit to the destination.

Get More Out of USPS Tracking:

USPS Tracking Plus®

## On the Way

### Arrived at USPS Facility

PALATINE IL DISTRIBUTION CENTER  
June 9, 2026 7:55 AM

### Arrived at USPS Facility

CAROL STREAM IL DISTRIBUTION CENTER  
June 9, 2026 12:08 AM

[See All Tracking History](#)[What Do USPS Tracking Statuses Mean?](#)

Text &amp; Email Updates



USPS Tracking Plus®



# EXHIBIT E

## MAILBOX RETRIEVAL RECORD — ELECTRONIC DELIVERY CONFIRMATION

### WHAT THIS EXHIBIT ESTABLISHES

*Fixes the tracking number, the Lake County criminal-filing-intake addressee, and the reported 6:12 a.m. July 23, 2026 Waukegan pickup, with DKIM, SPF, and DMARC passing in the raw headers.*

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Mailbox retrieval                                                                                                                      |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

## MAILBOX RETRIEVAL RECORD — ELECTRONIC DELIVERY CONFIRMATION

*Source: Gmail message body and metadata, retrieved July 28, 2026*

|                                      |                                                                                                                                                                                                  |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Gmail message ID</b>              | 19f93cef80b7565a                                                                                                                                                                                 |
| <b>Internet Message-ID</b>           | <9ef0e2b582492589abce9cd8e3a9fdb7@certifiedmaillabels.com>                                                                                                                                       |
| <b>From</b>                          | Certified Mail Labels <no_reply@certifiedmaillabels.com>                                                                                                                                         |
| <b>To</b>                            | DEFCON5REady@gmail.com                                                                                                                                                                           |
| <b>Subject</b>                       | Certified Mail Electronic Delivery Confirmation                                                                                                                                                  |
| <b>Received</b>                      | July 24, 2026 at 11:07:21 UTC (6:07:21 a.m. CDT)                                                                                                                                                 |
| <b>Authentication in raw headers</b> | DKIM pass; SPF pass; DMARC pass                                                                                                                                                                  |
| <b>Tracking number</b>               | 9402611898765521606811                                                                                                                                                                           |
| <b>Addressee</b>                     | Lake County Circuit Clerk, ATTN Criminal Division Filing Intake, 18 N. County St., RE People v. Allababidi, No. 23 CF 1146, Waukegan, IL 60085                                                   |
| <b>Reported event</b>                | Item picked up at a postal facility at 6:12 a.m. on July 23, 2026 in Waukegan, Illinois 60085                                                                                                    |
| <b>Vendor report link</b>            | <a href="https://cml-edc.s3.amazonaws.com/9402611898765521606811-20260724.pdf">https://cml-edc.s3.amazonaws.com/9402611898765521606811-20260724.pdf</a> (unavailable when checked July 28, 2026) |

### Message body

The message states that a Certified Mail item created July 10, 2026 was delivered; identifies Tracking No. 9402611898765521606811; gives the Lake County criminal-filing-intake address and the case reference; and reports the 6:12 a.m. July 23, 2026 Waukegan postal-facility pickup. The court's notice issued the same morning at 11:59 a.m.

### What this record establishes

It fixes the tracking number, the destination, and the reported pickup event, and it fixes the five-hour-forty-seven-minute interval between that pickup and the court's notice. The identity of the person who took custody of the article, and the county's scan, routing, classification, and docketing sequence during that interval, are recorded in intake metadata held by the Clerk's office. The accompanying motion asks this Court to order that metadata preserved.

Retrieved July 28, 2026 from the account holder's own mailbox.



# EXHIBIT F

JULY 23, 2026 FILE-STAMPED RENEWED RULE 606(A) REQUEST TO APPEAL

## WHAT THIS EXHIBIT ESTABLISHES

*The circuit-court file stamp on the renewed request, showing that the clerk ultimately performed the act Rule 606(a) required of it on July 9.*

## SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Circuit court filing                                                                                                                   |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS — CRIMINAL DIVISION**

**PEOPLE OF THE STATE OF ILLINOIS,**

*Plaintiff,*

v.

**EHAB ALLABABIDI,**

*Defendant.*

**No. 23 CF 1146**

Circuit Court, 19th Judicial Circuit  
Lake County, Illinois

**Hon. Christopher R. Stride**

Presiding Judge

**FILED**  
JUL 23 2026

**RENEWED RULE 606(a) WRITTEN REQUEST TO APPEAL AND  
TENDER OF NOTICE OF APPEAL FOR MINISTERIAL FILING**

*Ill. S. Ct. Rules 604(b), 606(a), 606(d), 9(f), 373(c)*

**REQUESTED DOCKET EVENT:** Notice of Appeal — Criminal (with written request under Rule 606(a)).  
This document is a court filing tendered for docketing. It is not correspondence.

**I. THE WRITTEN REQUEST AND THE NONDISCRETIONARY DUTY**

Defendant Ehab Allababidi is unrepresented: the Public Defender was discharged on the record on June 17, 2026, at the same proceeding at which the stay of his 180-day jail term was lifted. He wishes to appeal from the June 17, 2026 order. This instrument is his **written request to appeal under Illinois Supreme Court Rule 606(a)**, which commands: “If the defendant does not have an attorney and ... requests ... in writing that the defendant wishes to appeal, the clerk of the trial court must forthwith prepare, sign, and file a notice of appeal for the defendant.” The duty is the Clerk’s own, it is ministerial, and it is not conditioned on counsel, leave of court, or any fee. A completed Notice of Appeal in the form required by Rule 606(d) and the Article VI Forms Appendix follows at page 3 of this instrument; the Clerk may file it as tendered or prepare, sign, and file her own to identical effect. The appeal is taken as of right under Rule 604(b), which authorizes appeal “from an order modifying the conditions of or revoking” a probation sentence.

**II. THE APPELLATE COURT HAS ALREADY FIXED THE ROUTE**

On July 9, 2026, the Appellate Court, Second District, rejected Defendant’s appellate submissions (Envelope No. 38927349) with this instruction:

“You must file your notice of appeal in the circuit court. Once you receive an appeal number, you may file your other documents into that appeal.” (Shared Appendix, App. A.)

Every step of the appeal therefore runs through this Clerk’s intake. The 30-day period of Rule 606(b) ends **July 17, 2026**. Upon filing, Rule 606(b) directs transmission of a copy of the notice to the Appellate Court within 5 days, and Rule 606(e)(1) directs that notice be sent to the State’s Attorney.

**III. THE FILING DATE IS PRESERVED AGAINST EVERY INTAKE OUTCOME**

This request and notice are also being submitted electronically. Three rules independently preserve the date: Rule 9(f) (a timely motion for original submission date after a rejection **shall** be granted); Rule 373(c) (the tender date controls a notice of appeal filed in the trial court); and Rule 606(c) (the Appellate Court may grant leave and order its clerk to transmit the notice to the trial court for filing on a showing of reasonable excuse). An intake outcome other than prompt filing does not defeat the appeal; it only documents how the appeal had to be perfected.

---

#### IV. THE MINISTERIAL ACTS REQUESTED

- (1) File the Notice of Appeal at page 3 in No. 23 CF 1146, effective as of its tender;
- (2) Docket it as **Notice of Appeal — Criminal**, not as correspondence or any other classification;
- (3) Transmit a copy to the Clerk of the Appellate Court, Second District, within 5 days (Rule 606(b)), and send notice to the Lake County State's Attorney (Rule 606(e)(1)); and
- (4) Confirm the filing and transmission in writing to defcon5ready@gmail.com.

**VERIFICATION (735 ILCS 5/1-109).** Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct, except as to matters stated to be on information and belief, which I certify I verily believe to be true, and that documents cited from the Shared Appendix are true and correct copies of what they purport to be.

**CERTIFICATE OF SERVICE (Rule 12(b)(6); 735 ILCS 5/1-109).** I certify that on July 10, 2026 I served a true copy of this filing and the Shared Appendix on the Lake County State's Attorney, 18 N. County St., Waukegan, IL 60085, by U.S. Mail, postage prepaid, and by email to statesattorney@lakecountyil.gov.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI**, Defendant, Pro Se

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: July 10, 2026

FILED  
JUL 23 2026  
Erie County  
Circuit Court

# EXHIBIT G

JULY 23, 2026 FILE-STAMPED NOTICE OF APPEAL

## WHAT THIS EXHIBIT ESTABLISHES

*The operative notice of appeal transmitted to the Second District.*

## SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Circuit court filing                                                                                                                   |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS**

**PEOPLE OF THE STATE OF ILLINOIS,**  
*Plaintiff,*

v.

**EHAB ALLABABIDI,**  
*Defendant.*

**No. 23 CF 1146**

Circuit Court, 19th Judicial Circuit  
Lake County, Illinois

**Hon. Christopher R. Stride**  
Presiding Judge

**FILED**  
JUL 23 2026  
CLERK OF COURT  
LAKE COUNTY, ILLINOIS

**NOTICE OF APPEAL**

Defendant-Appellant Ehab Allababidi appeals to the Appellate Court of Illinois, Second District, from the order described below:

**1. Court to which appeal is taken:**

Appellate Court of Illinois, Second District

**2. Name of appellant and address:**

Ehab Allababidi, 8516 W. Winona St., Chicago, IL 60656

**3. Name and address of appellant's attorney on appeal:**

None — Appellant is self-represented (Public Defender discharged June 17, 2026); appointment of counsel on appeal is requested under Ill. S. Ct. Rule 607(a)

**4. Date of the judgment or order appealed from:**

June 17, 2026

**5. Offense of which convicted:**

Aggravated reckless driving / bodily harm, Class 4 felony (625 ILCS 5/11-503(a)(1)) — Count 1, judgment of September 8, 2025, as reflected in the circuit court record

**6. Sentence:**

30 months' probation with a 180-day Lake County Jail term stayed; the stay was lifted by the order of June 17, 2026

**7. Nature of the order appealed from:**

Order and minute orders of June 17, 2026 lifting the stay of the 180-day jail term (an order modifying the conditions of, or revoking, a probation sentence, Ill. S. Ct. Rule 604(b)), declining to quash the outstanding arrest warrant, and discharging the Public Defender.

/s/ Ehab Allababidi

**EHAB ALLABABIDI, Defendant-Appellant, Pro Se**

8516 W. Winona St., Chicago, IL 60656 | (773) 920-0030 | defcon5ready@gmail.com

Dated: July 10, 2026

FILED  
JUL 23 2023  
Clerk of Court

# EXHIBIT H

## SECOND DISTRICT NOTICE DOCKETING APPEAL NO. 2-26-0352

### WHAT THIS EXHIBIT ESTABLISHES

*Confirms the appellate docket number and fixes the fourteen-day Rule 312 docketing statement deadline of August 6, 2026.*

### SOURCE AND AUTHENTICATION

|                       |                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>SOURCE</b>         | Appellate court notice                                                                                                                 |
| <b>PAGES</b>          | Complete document                                                                                                                      |
| <b>AUTHENTICATION</b> | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |





## ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY  
ELGIN, IL 60120  
(847) 695-3750

---

July 23, 2026

[ILDesignatedParty]

RE: People v. Allababidi, Ehab  
Appeal No.: 2-26-0352  
County: Lake County  
Trial Court No.: 23CF1146

A notice of appeal in the above cause has been filed. This appeal has been docketed as No. 2-26-0352.

Pursuant to Illinois Supreme Court Rule 312, an appellant must file a complete docketing statement, together with proof of service, within 14 days of the filing of the notice of appeal. A docketing statement must have attached a copy of any written request to the circuit clerk or the court reporter for preparation of the record on appeal.

Generally, when filing the docketing statement, an appellant must pay a \$50 filing fee. However, if you are indigent and unable to pay the filing fee, you may file an application to waive the filing fee. Forms for the docketing statement and the application to waive the filing fee are available at [https://atjil.org/resources/?fwp\\_case\\_status=appeal-a-case](https://atjil.org/resources/?fwp_case_status=appeal-a-case). You will also find additional forms, general information about the appellate process, and a free legal help desk where an indigent litigant can submit specific questions to a lawyer.

Upon receipt of the docketing statement and, if required, the filing fee, the court will issue a docketing order setting forth the due dates for the record on appeal.

Jeffrey H. Kaplan  
Clerk of the Court

# EXHIBIT I

## SEPTEMBER 8, 2025 ORDER AND CERTIFICATE OF FELONY PROBATION

### WHAT THIS EXHIBIT ESTABLISHES

*The controlling sentencing order, and the answer to most of the petition. Condition 2 makes financial obligations payable in monthly installments and in full not later than 90 days before termination. Condition 4 prohibits illegal substances 'or prescription medication of another.' Condition 15 imposes the 180-day term, handwritten 'Stayed pending compliance.' Condition 19 requires 240 public service hours at 12 hours per month, with proof due 90 days before termination. Condition 30 provides that absent violations the Class 4 felony shall be amended to a Class A misdemeanor. Condition 32 fixes termination at March 7, 2028.*

### HOW THIS EXHIBIT FITS THE RECORD

This is the order every other document in the record is measured against. The petition at Exhibit J purports to enforce it, and misquotes it twice: condition 19 sets the public-service rate at **12** hours per month where the petition swears 20, and condition 4 bars “prescription medication **of another**” where the petition drops those words. Condition 32 fixes termination at March 7, 2028, which under conditions 2, 6, and 19 makes every obligation the petition charges due on or about December 8, 2027 — nineteen months after it was filed. Condition 30 sets what a violation forfeits: the reduction of this Class 4 felony to a Class A misdemeanor.

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Sentencing order (pp. 1, 3, 5)                                                                                                         |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

**FILED**

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

9/8/2025 9:08 AM

PEOPLE OF THE STATE OF ILLINOIS

VS

Ehab Allababidi

Case No. 23CF1148

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

ORDER AND CERTIFICATE OF  
☒ FELONY PROBATION / ☐ INTENSIVE PROBATION / ☐ CONDITIONAL DISCHARGE /  
☐ PROBATION PURSUANT TO SECTION 550/10 AND 570/410 OF CHAPTER 720 OF THE ILLINOIS COMPILED  
STATUTES

This cause coming on for sentencing, pursuant to a: ☐ finding of guilty ☒ negotiated plea of guilty ☐ open plea of guilty, Defendant having been adjudged guilty of Agg Reckless Driving/Great Bodily Harm, being a Class 4 Felony.

The Court after conducting a hearing or having accepted a negotiated plea, and after considering the factors and the nature and circumstances of the offense, and the history, character, and condition of the offender, and after considering Defendant's financial ability to pay the amount hereinafter assessed,

ORDERS:

Defendant is hereby sentenced to a term of 30 months probation/conditional discharge, the conditions of which are that Defendant shall:

- ☒ 1. Not violate any laws or ordinances of any jurisdiction, including traffic regulations;
- ☒ 2. Pay all fines, fees, court costs, assessments and restitution set forth on **Exhibit A** through the Office of the Clerk of the Circuit Court in equal monthly installments by the first of each month to be paid in full not later than 90 days before the termination date unless the Court orders otherwise;
- ☒ 3. Obtain/continue employment and/or attend educational programs unless otherwise ordered by the Court;
- ☒ 4. Not use or be in possession of any illegal substance or prescription medication of another, or use any substance designed to have the effects of an illegal substance, or be in the presence of anyone using or in possession of such substances;
- ☒ 5. Appear in Court on the oral or written notice of the Circuit Clerk, Compliance Officer, Probation Officer, State's Attorney, or the Court;
- ☒ 6. Unless otherwise ordered by this Court, not less than 90 days prior to the termination of this case, provide proof of completion of all terms and conditions of sentence to the Compliance Unit if sentenced to conditional discharge or the Lake County Adult Probation Services Division if sentenced to probation;
- ☒ 7. Strictly comply with the terms and provisions of any and all Orders of Protection;
- ☒ 8. Not operate a motorized vehicle without a valid driver's license;
- ☒ 9. Upon a violation of any term or condition of this Order, the Lake County Adult Probation Services Division may invoke any sanctions from the list of intermediate sanctions adopted by the Chief Judge;
- ☒ 10. Submit a sample for DNA indexing as required by law;
- ☒ 11. Not possess any firearm or other dangerous weapon. Defendant is to surrender his or her Firearm Owner's Identification (FOID) Card to the Lake County Sheriff, Babcox Justice Center, 25 S Martin Luther King Jr. Ave., Waukegan, Illinois 60085, within 24 hours of the entry of this Order;
- ☒ 12. The following conditions apply to all Defendants sentenced to felony probation.
  - Defendant shall appear immediately in person before the Lake County Adult Probation Services Division at 215 W. Water Street, Waukegan, Illinois 60085, or if in custody immediately upon release from custody, to have an intake interview and thereafter report as often as directed by the Probation Officer;
  - Comply with a curfew of 6:00 P.M. to 6:00 A.M. daily requiring Defendant to be in his/her residence except when performing probation obligations, attending treatment, working at employment approved by Probation Officer, attending court, or attending to other specific activities which have been approved in advance by

White-Original Green-Client Canary – Probation/Compliance Pink – State's Attorney Goldenrod – Defense

Page 1 of 5

171-134 (Rev. 11/24)

**IF CHECKED, THE FOLLOWING PROVISIONS APPLY**

☐ 14. Defendant shall register as required by law as a ☐sex offender ☐arsonist ☐child murderer ☐other \_\_\_\_\_

Defendant shall submit to such testing as required by law or specifically required by separate order.

☒ 15. Defendant is sentenced to a determinate term of 180 days in the custody of the County Sheriff.  
☐ No good time shall be awarded as injury resulted from offense. Stayed pending compliance

☐ 16. Defendant shall serve a term of periodic imprisonment to be confined for twenty-four (24) hours, seven (7) days each week for a period of \_\_\_\_\_ months ☐in the Sheriff's Community Based Corrections Center (CBCC) and shall follow all rules of the CBCC program, or ☐if eligible, through the Adult Probation Electronic Home Monitoring program (EHM) and shall follow all rules of the EHM program as outlined in **Exhibit B**.

☐ 17. Defendant shall serve a term in the County Work Release Program for a period of \_\_\_\_\_ months, which does not exceed the statutory term of 12 months, as required by 730 ILCS 5/5-7-1(d).

☐ 18. Defendant shall pay a fee for ☐room and board ☐electronic home monitoring at the rate established by Lake County Board Ordinance with the concurrence of the Chief Judge pursuant to statute.

☒ 19. Defendant shall perform 240 hours of public service at a minimum rate of 12 hours per month and report immediately to and register with the Public Service Unit of the Lake County Adult Probation Services Division. Defendant shall perform this service at the time and places directed and shall comply with all Public Service Unit protocols and shall serve upon the Public Service Unit written evidence of completion of the public service hours at least 90 days prior to the termination of this sentence.

☐ 20. Good cause having been shown, Defendant shall perform \_\_\_\_\_ hours of community service at a minimum rate of \_\_\_\_\_ hours per month and report immediately to and register with the Compliance Unit (if sentenced to conditional discharge) or the Lake County Adult Probation Services Division (if sentenced to probation). Defendant shall perform this service at a self-selected not-for-profit organization, public body, religious institution, charitable organization, or individual agreeing to accept community service from offenders as verified by the Compliance Unit or the Lake County Adult Probation Services Division and shall serve upon the Compliance Unit or the Lake County Adult Probation Services Division written evidence of completion of the community service hours at least 90 days prior to the termination of this sentence.

☐ 21. Defendant shall complete all requirements for ☐high school graduation ☐GED ☐other \_\_\_\_\_

☒ 22. Defendant shall:  
☐ reside at \_\_\_\_\_  
☐ not reside at \_\_\_\_\_  
☐ not engage in any abusive, violent, or harassing conduct of any kind with \_\_\_\_\_  
☐ not be present at \_\_\_\_\_

☐ not have any contact of any kind directly or indirectly with members of street gangs and drug users or dealers and not wear clothing associated with any street gang, communicate or exhibit gang signs  
☒ not have any contact of any kind directly or indirectly with \_\_\_\_\_  
Christopher King, Manuel Rojo, O'Brien Landscape or Smith Printing

☒ 23. Defendant shall comply with the following evaluations, treatment recommendations, educational or vocational requirements by approved providers including the payment of fees:

- |                                                                         |                                                                   |
|-------------------------------------------------------------------------|-------------------------------------------------------------------|
| <input type="checkbox"/> The Cognitive Program, "Thinking for a Change" | <input checked="" type="checkbox"/> Live victim impact panel      |
| <input type="checkbox"/> Mental health/psychiatric treatment            | <input type="checkbox"/> Substance abuse evaluation and treatment |
| <input type="checkbox"/> Parenting classes                              | <input type="checkbox"/> Sex offender evaluation and treatment    |

White-Original Green-Client Canary – Probation/Compliance Pink – State's Attorney Goldenrod – Defense

☐ 28. Defendant shall follow and comply with all of the additional terms and conditions of the following specialized probation supervision units as set forth in **Exhibit B** which is attached hereto and incorporated by reference:

- ☐ Intensive Probation Supervision (IPS)
- ☐ Domestic Violence Unit
- ☐ Sex Offender Unit
- ☐ DUI Unit

☐ 29. Defendant shall follow and comply with all of the additional terms and conditions of the following Therapeutic Intensive Monitoring (TIM) Court specialized probation set forth in **Exhibit B** which is attached hereto and incorporated by reference:

- ☐ TIM Drug Court
- ☐ TIM Mental Health Court
- ☐ TIM Veterans Treatment and Assistance Court

Additionally, Defendant must follow, comply and complete all of the obligations undertaken by him/her in the Specialty Court Contract which is attached to and incorporated into both **Exhibit B** and this Probation Order by reference.

☒ 30. Defendant shall also comply with **OTHER** requirements as follows:

No drugs, alcohol, bars, cannabis or weapons; No driving w/o a valid license or permit

n/p: (Count 2) Agg Speeding (Class A); Resitution to be paid to CW in the amount of \$2,670.86

Should the Defendant have no violations during his probation, then the plea of guilty to Count 1 in the indictment,

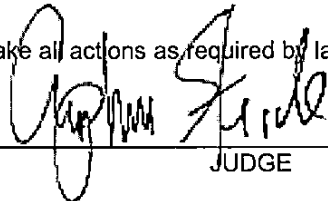
Agg Reckless Driving/Bodily Harm (Class 4), shall be amended to a Reckless Driving (Class A ) misdemeanor.

☐ 31. Upon the successful completion of Defendant's probation pursuant to 720 ILCS 570/410 or 720 ILCS 550/10, Defendant shall be discharged and the charges dismissed without further order of the Court.

☒ 32. Probation/conditional discharge will terminate and the Circuit Clerk shall transfer the case to closed status on March 7, 2028 unless there is pending an unresolved petition to revoke probation or this order has been otherwise modified or extended.

☒ 33. The Clerk of this Court is directed to make all notifications and take all actions as required by law.

ENTER:

  
JUDGE

Dated this 4 day of September, 2025

Order prepared by Bailey C. Russell

I, the above-named Defendant, acknowledge reading and receipt of this document.

I understand and have been advised in open court that if I am not a citizen of the United States, that a conviction or a sentence of supervision or probation for the offense for which I have been charged may have the consequences of deportation, exclusion from admission to the United States, or denial of naturalization under the laws of the United States.

I understand that any individual convicted of domestic battery may be subject to federal criminal penalties for possessing, transporting, shipping, or receiving any firearm or ammunition in violation of the federal Gun Control Act of 1968 [18 U.S.C. 922(g)(8) and (9)].

I understand that upon a finding of any violation of a condition contained in this Order or accompanying Exhibits, and after due notice and hearing, the Court may revoke this sentence, enter judgment of conviction and impose any penalty originally provided for by applicable statute or ordinance including a jail sentence.

I UNDERSTAND THAT FAILURE TO APPEAR IN COURT WHEN REQUIRED CONSTITUTES A **WAIVER** OF MY RIGHT TO CONFRONT WITNESSES AGAINST ME, AND A HEARING TO REVOKE MY SENTENCE CAN PROCEED IN MY ABSENCE AND RESULT IN RE-SENTENCING **WITHOUT MY BEING PRESENT**.

Street Address: 8516 West Winona St.

Date of Birth: September 24, 1996

City/State/Zip: Chicago, IL 60656

  
Defendant

Telephone No.: (773)-920-0030

# EXHIBIT I-2

## SEPTEMBER 8, 2025 ORDER FOR RESTITUTION

### WHAT THIS EXHIBIT ESTABLISHES

Sets \$2,670.86 payable to a secondary claimant through the Circuit Clerk's office, recites that the parties were 'duly represented,' and was prepared by Assistant Public Defender Bailey C. Russell. It fixes no due date of its own; condition 2 of the probation order supplies it.

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Sentencing order                                                                                                                       |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT,  
LAKE COUNTY, ILLINOIS

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

**State of Illinois**

Plaintiff(s)

vs.

**Ehab Allababidi**

Defendant(s)

General No. **23CF1146**

## ORDER FOR RESTITUTION

This cause coming to be heard before this Honorable Court, the parties being duly represented, and the Court being fully apprised, it is hereby ordered that Restitution be paid as follows:

Restitution shall be paid to:

Name O'Brien Landscape  
Address 5700 Howard St.  
City, Skokie State, IL Zip 60077

In the total amount of \$2,670.86 to be paid through the Circuit Clerk's office.



All money paid shall apply to restitution first.



Joint and several with

case number

ENTER:

  
JUDGE

Dated this 8 day of September, 2025.

Prepared by:

Name: Bailey C. Russell  
Address: 15 S. County St.  
City: Waukegan  
Phone:  
Fax  
ARDC: 6340962

State: IL  
Zip Code:

# EXHIBIT I-3

## SEPTEMBER 8, 2025 FINANCIAL SENTENCING ORDER

### WHAT THIS EXHIBIT ESTABLISHES

*The financial judgment. Paragraph 7(a), 'Restitution,' is BLANK — no restitution figure is carried into the financial judgment at all. The stated total balance is \$2,251.00, of which \$1,500.00 is a probation fee of \$50 per month accruing across 30 months. This is the document the State's sworn allegation of willful nonpayment must be measured against.*

### HOW THIS EXHIBIT FITS THE RECORD

The financial half of the same sentence, and the answer to the willfulness allegation. Paragraph 7(a) is blank because the principal property loss had already been paid — see Exhibit S, where the insurer states it paid \$16,557.00 on that loss before sentencing. Read with Exhibit X, which puts the arrears at \$100.00 on transfer of supervision, and Exhibit U, which shows probation itself never identified a missed installment, there is no financial obligation the record shows was due and refused.

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Sentencing order                                                                                                                       |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |



IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

FILED

THE PEOPLE OF THE STATE OF ILLINOIS,  
City or Village of \_\_\_\_\_

vs.

Ehab Allababidi  
(Defendant)

General Number 23CF1146

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

FINANCIAL SENTENCING ORDER

The Defendant has appeared before this court and ☒ plead guilty ☐ was found guilty of the offenses listed in paragraph 1 below.

☐ Defendant has been admonished of his/her right to be sentenced under the law in effect at the time of the offense or the time of sentencing:

In addition to any other sentences imposed in the case, the Defendant is ordered to pay the following fines and assessments:

1. Fine(s) (705 ILCS 105/27.3b-1 and 730 ILCS 5/4-4.5-5 sets forth the minimum fine):

- a. Offense: Aggravated Reckless Driving/Great Bodily Harm \$ 75  
b. Offense: \$  
c. Offense: \$  
Total fine(s): \$ 75

2. Fine Credits:

- ☐ Credit for time served: \_\_\_\_\_ days x \$30.00 per day credit \$( )

Balance of fines less fine credit(s): \$ 75

3. Criminal Assessments (One per case. Check the highest-class offense only.)

Offense:

- a. ☒ Schedule 1: Generic Felony (705 ILCS 135/15-5) \$ 549 \$ 549  
b. ☐ Schedule 2: Felony DUI/OUI (705 ILCS 135/15-10) \$1,709 \$  
c. ☐ Schedule 3: Felony Drug Offense (705 ILCS 135/15-15) \$2,215 \$  
d. ☐ Schedule 4: Felony Sex Offense (705 ILCS 135/15-20) \$1,314 \$  
e. ☐ Schedule 5: Generic Misdemeanor Offense (705 ILCS 135/15-25) \$ 439 \$  
f. ☐ Schedule 6: Misdemeanor DUI/OUI (705 ILCS 135/15-30) \$1,381 \$  
g. ☐ Schedule 7: Misdemeanor Drug Offense (705 ILCS 135/15-35) \$ 905 \$  
h. ☐ Schedule 8: Misdemeanor Sex Offense (705 ILCS 135/15-40) \$1,184 \$  
i. ☐ Schedule 9: Major Traffic Offense (705 ILCS 135/15-45) \$ 325 \$  
j. ☐ Schedule 10: Minor Traffic Offense (705 ILCS 135/15-50) \$ 226 \$  
k. ☐ Schedule 10.5: Truck Weight/Load Offense (705 ILCS 135/15-52) \$ 260 \$  
l. ☐ Schedule 11: Conservation Offense (705 ILCS 135/15-55) \$ 195 \$  
m. ☐ Schedule 13: Non-Traffic Violation (705 ILCS 135/15-65) \$ 100 \$

Subtotal-Criminal Assessment: \$ 549

4. Offsets of Assessments

- a. ☐ Public/Community Service (1 hour x current Illinois minimum wage subtracted from Criminal Assessment - Section 3 – only) (705 ILCS 135/5-20(b))  
Number of Hours \_\_\_\_\_ x \$ \_\_\_\_\_ per hour \$( )  
b. ☐ Substance Abuse Treatment Program Credit (subtracted from Criminal Assessment – Section 3 – only) (705 ILCS 135/5-10(c-5)) \$( )

Total Additional Offsets: \$( )

Total Balance of Criminal Assessments: \$

5. Conditional Assessment(s) (Check all that apply)

Offense:

- a. ☐ Arson/Residential/Aggravated Arson (705 ILCS 135/15-70(1)) \$500 per conviction \$  
b. ☐ Child Pornography (705 ILCS 135-15-70(2))  
☐ State Police ☐ Other Arresting Agency \$500 per conviction \$  
c. ☐ Crime lab drug analysis (705 ILCS 135/15-70(3)) \$ 100 \$  
d. ☐ DNA analysis (705 ILCS 135/15-70(4)) \$ 250 \$  
e. ☐ DUI analysis (705 ILCS 135/15-70(5)) \$ 150 \$

|                                     |    |                                                                                                                                    |                                                    |          |
|-------------------------------------|----|------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|----------|
| <input type="checkbox"/>            | f. | Street Value – Drug-related offense, possession/delivery (705 ILCS 135/15-70(6))                                                   | \$                                                 |          |
| <input type="checkbox"/>            | g. | Street Value – Methamphetamine, possession/manufacture (705 ILCS 135/15-70(7))                                                     | \$                                                 |          |
| <input type="checkbox"/>            | h. | Order of protection violation (705 ILCS 135/15-70(8))                                                                              | \$200 per conviction                               | \$       |
| <input type="checkbox"/>            | i. | Order of protection violation (705 ILCS 135/15-70(9))                                                                              | \$ 25 per violation                                | \$       |
| <input type="checkbox"/>            | j. | State's Attorney petty or business offense (705 ILCS 135/15-70(10)(A))                                                             | \$ 4                                               | \$       |
| <input checked="" type="checkbox"/> | k. | State's Attorney conservation or traffic offense (705 ILCS 135/15-70(10)(B))                                                       | \$ 2                                               | \$2      |
| <input type="checkbox"/>            | l. | Speeding in a construction zone (705 ILCS 135/15-70(11))                                                                           |                                                    |          |
| <input type="checkbox"/>            |    | <input type="checkbox"/> Interstate Highway <input type="checkbox"/> County                                                        | \$ 250                                             | \$       |
| <input type="checkbox"/>            | m. | Supervision disposition under Vehicle Code (705 ILCS 135/15-70(12))                                                                | \$ 0.50                                            | \$       |
| <input type="checkbox"/>            | n. | Guilty plea or no contest, specified offense against family member                                                                 |                                                    |          |
| <input type="checkbox"/>            |    | <input type="checkbox"/> Sentencing offense is Sexual Assault (705 ILCS 135/15-70(13))                                             | \$ 200                                             | \$       |
| <input type="checkbox"/>            | o. | EMS response reimbursement, vehicle/snowmobile/boat violation (DUI/OUI) (705 ILCS 135/15-70(14))                                   | Max. Amt. is \$1,000                               | \$       |
| <input type="checkbox"/>            | p. | EMS response reimbursement, controlled substances violation (705 ILCS 135/15-70(15))                                               | \$1,000                                            | \$       |
| <input type="checkbox"/>            | q. | EMS response reimbursement, reckless driving/aggravated reckless driving/speed in excess 26 mph violation (705 ILCS 135/15-70(16)) | Max. Amt. is \$1,000                               | \$       |
| <input type="checkbox"/>            | r. | Human Trafficking, Sex Offender Registration, or Soliciting a Sexual Act Violation (705 ILCS 135/15-70(17));                       | Not less than \$350 for each offense sentenced     | \$       |
|                                     |    | This amount shall be the minimum amount of the fine, which shall be distributed pursuant to this act                               |                                                    |          |
| <input type="checkbox"/>            | s. | Weapons Violation, Trauma Center Fund (705 ILCS 135/15-70(18))                                                                     | \$100 per conviction                               | \$       |
| <input type="checkbox"/>            | t. | Scott's Law (705 ILCS 135/15-70(19)) <input type="checkbox"/> State Police <input type="checkbox"/> County                         | \$ 250                                             | \$       |
|                                     |    |                                                                                                                                    | <b>Subtotal – Conditional Assessment Amount:</b>   | \$       |
|                                     |    |                                                                                                                                    | <b>TOTAL CRIMINAL AND CONDITIONAL ASSESSMENTS:</b> | \$551.00 |

**6. Assessment waiver (only applies to financial obligations under sections 3 and 5):**

a. ☐ Waiver of Criminal Court Assessment granted \_\_\_\_\_ (does not apply to fines or IVC)

(Date)

☐ 100% ☐ 75% ☐ 50% ☐ 25% Waiver amount: \$(\_\_\_\_\_)

**Balance of assessments and conditional assessments after credits are applied:** \$\_\_\_\_\_

**7. Other Assessments:**

|                                     |    |                                                                                                             |        |    |
|-------------------------------------|----|-------------------------------------------------------------------------------------------------------------|--------|----|
| <input type="checkbox"/>            | a. | Restitution (See separate Restitution Order for details)                                                    | \$     |    |
| <input checked="" type="checkbox"/> | b. | Probation/Supervision/Conditional Discharge Fee \$50/month x 30 months                                      | \$1500 |    |
| <input checked="" type="checkbox"/> | c. | Public Defender assessment                                                                                  | \$100  |    |
| <input checked="" type="checkbox"/> | d. | Service Provider cost <input type="checkbox"/> Urinalysis Testing \$125 <input checked="" type="checkbox"/> | \$125  |    |
| <input type="checkbox"/>            | e. | Therapeutic Intensive Monitoring Fee                                                                        | \$     |    |
| <input type="checkbox"/>            | f. | Other: _____                                                                                                | \$     |    |
| <input type="checkbox"/>            | g. | Pretrial Bond Services Fee                                                                                  | \$     |    |
| <input type="checkbox"/>            | h. | Court Ordered Contribution: Agency & Address: _____                                                         | \$     |    |
| <input type="checkbox"/>            | i. | Roadside Memorial Fund                                                                                      | \$ 50  | \$ |

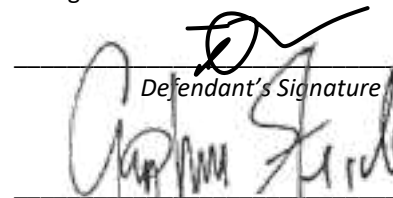
**8. Bond posted:** \_\_\_\_\_ **minus 10% bond fee** \_\_\_\_\_ **= Bond Available:** \$\_\_\_\_\_

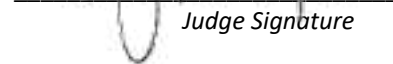
☐ **SEE EXHIBIT A** **BALANCE OF ALL FINES AND ASSESSMENTS MINUS BOND:** \$2,251.00

I am the Defendant in the above case and I have read and understand this Financial Sentencing Order.

Dated: September 8, 2025

Entered this date: 09/08/2025, 20  

  
Defendant's Signature

  
Judge Signature

# EXHIBIT J

## MAY 14, 2026 VERIFIED PETITION FOR REVOCATION OF PROBATION

### WHAT THIS EXHIBIT ESTABLISHES

*The allegations, sworn by an assistant State's Attorney. It recites the public service condition as 20 hours per month where the order says 12; omits 'or prescription medication of another' from condition 4; dates the amphetamine screen 11/10/2025 where probation's memorandum says 11/20/25; alleges failure to report to Lake County probation without disclosing the transfer of supervision to Cook County; and prays that the court 'lift the stay on any jail sentence previously imposed.' Inclusion concedes no allegation.*

### HOW THIS EXHIBIT FITS THE RECORD

The instrument the custody rests on, and the one the rest of the record contradicts. Its drug allegation was resolved in writing five months earlier (Exhibit W); its financial allegation has no object (Exhibits I-3, S, X); its reporting allegation names a county that no longer held supervision (Exhibit X); and its recitals of conditions 4 and 19 do not match the order it enforces (Exhibit I). It has never been heard: Exhibit K is the arraignment that did not happen, and Exhibit M is the status call at which the relief it prayed for was granted anyway.

### SOURCE AND AUTHENTICATION

|                       |                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>SOURCE</b>         | State's charging instrument                                                                                                            |
| <b>PAGES</b>          | Complete document                                                                                                                      |
| <b>AUTHENTICATION</b> | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

IN THE CIRCUIT COURT OF THE NINETEENTH  
JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

PEOPLE OF THE STATE OF ILLINOIS

VS.

**EHAB ALLABABIDI**

GEN. NO. 23CF00001146

**PETITION FOR REVOCATION**

NOW COMES the People of the State of Illinois by Eric F. Rinehart, Lake County State's Attorney, by and through, Nicholas Shepherd, Assistant State's Attorney, and petitions this Honorable Court to revoke the defendant's probation, pursuant to 730 ILCS 5/5-6-4. In support of this petition, the People of the State of Illinois state the following, upon information and belief:

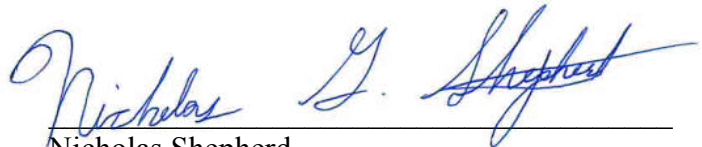
1. That on or about September 8, 2025, the defendant was placed on 30 months of probation, for the offense of AGG RECKLESS DRVG/BODILY HARM, a Class 4 Felony.
2. That the defendant's probation, includes the following condition(s):
  - A. The defendant shall pay all fines, fees, court costs, assessments, and restitution.
  - B. The defendant shall not use any illegal substance.
  - C. The defendant shall report to Probation as directed.
  - D. The defendant shall perform 240 hours of public service at a minimum rate of 20 hours per month.
  - E. The defendant shall comply with a Live Victim Impact Panel.
3. The defendant failed to comply with the terms of their probation, and in support of this allegation, the People state the defendant violated the terms of their probation in the following manner:
  - A. The defendant willfully failed to pay court ordered financial obligations.
  - B. The defendant tested positive for Amphetamine (illegal substance) on or about 11/10/2025.
  - C. The defendant failed to report to Probation/Compliance on or about 02/19/2026, 02/27/2026, 03/10/2026, 03/11/2026, and 03/26/2026.
  - D. The defendant failed to provide proof of completion of 240 hours of public service.
  - E. The defendant failed to provide proof of completion of the Live Victim Impact Panel

WHEREFORE, The People of the State of Illinois pray this Honorable Court revoke the Defendant's probation of the said named defendant for failure to perform the conditions of the sentence heretofore entered, and further moves this Honorable Court to lift the stay on any jail sentence previously imposed or issue a warrant for the arrest and apprehension of the said named defendant, who shall be brought immediately to court for the purpose of setting a date of hearing on said petition or to order a summons to the offender to appear.

The undersigned, having been first duly sworn, states she is informed and believes the allegations of the above petition are true and correct.

ERIC F. RINEHART

LAKE COUNTY STATE'S ATTORNEY



Nicholas Shepherd  
Assistant State's Attorney

SUBSCRIBED and SWORN to before me  
12th day of May, 2026



NOTARY PUBLIC



# EXHIBIT J-2

## MAY 14, 2026 NOTICE OF MOTION ON THE PETITION FOR REVOCATION

### WHAT THIS EXHIBIT ESTABLISHES

*Sets the May 28, 2026 arraignment. The line 'Attorney:' is left blank: the State served no defense counsel.*

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | State's notice                                                                                                                         |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

FILED

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF LAKE )

LC 23CF1146

IN THE CIRCUIT COURT OF THE NINETEENTH  
JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 )  
VS. )  
 )  
 )  
EHAB ALLABABIDI )

GENERAL NO: 23CF1146

NOTICE

TO: **Defendant: 8516 W. Winona St., Chicago, IL 60656**  
**Attorney:**  
**Probation: Marisa Cervantes, Via Interoffice Mail**  
**CLERK-T611**

On **May 28<sup>th</sup>, 2026**, at **9:00 A.M.** or as soon thereafter as counsel may be heard, I shall appear in person before the Honorable **Christopher Stride, T-611**, or any Judge sitting in his/her stead, in the Court Room usually occupied by him as a Court Room, Court House, Waukegan, Lake County, Illinois, and then and there: Arraign the defendant on the attached Petition for Revocation of Probation.

DATED: **May 14, 2026**

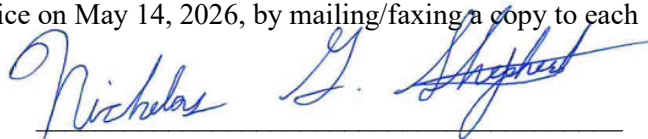


Nicholas Shepherd  
Assistant State's Attorney

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF LAKE )

**AFFIDAVIT**

I, Nicholas Shepherd, served this notice on May 14, 2026, by mailing/faxing a copy to each person to whom it is directed.



SUBSCRIBED and SWORN to before me  
May 14, 2026.



NOTARY PUBLIC



# EXHIBIT K

## MAY 28, 2026 COURT MINUTES — ARRAIGNMENT ON PETITION TO REVOKE

### WHAT THIS EXHIBIT ESTABLISHES

*The arraignment that never happened. The minutes list as present only the judge, an assistant State's Attorney, an ECR specialist, and a probation officer. Appellant is not listed as present. No defense counsel is listed. The entire disposition reads 'Case Called' and 'Issue Warrant.' No plea or denial was entered, and the petition has never been heard since.*

### HOW THIS EXHIBIT FITS THE RECORD

The proceeding at which the custodial warrant issued. Read against Exhibit J-2, whose “Attorney:” line is blank, and Exhibit L, which recites “PD APPOINTED,” it shows a defendant arraigned in absentia with no counsel of record either notified or present. Nothing in this record shows the petition was heard on this date or any date since.

### SOURCE AND AUTHENTICATION

|                       |                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>SOURCE</b>         | Circuit court minutes                                                                                                                  |
| <b>PAGES</b>          | Complete document                                                                                                                      |
| <b>AUTHENTICATION</b> | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |





IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

|                      |   |                                               |
|----------------------|---|-----------------------------------------------|
| People               | ) |                                               |
|                      | ) |                                               |
| Plaintiff,           | ) | Case No. 23CF00001146                         |
| v.                   | ) | Location: Courtroom 611                       |
|                      | ) | Event Date: May 28, 2026 9:00 AM              |
| PEOPLE VS ALLABABIDI | ) | Event Type: Arraignment On Petition To Revoke |
| Defendant.           | ) |                                               |
|                      | ) | Clerk: Johanna B                              |

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Guilty  
09/08/2025

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Nolle Prosequi  
09/08/2025

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
Nicholas Shepherd, States Attorney  
ECR Specialist, Lake County Court Reporters

**Present in Court**

MARISSA CERVANTES - Lake County Adult Probation Services

**Nature of Proceedings:**

Event Result: Case Called 05/28/2026.  
Issue Warrant

# EXHIBIT L

## MAY 28, 2026 WARRANT OF ARREST — VIOLATION

### WHAT THIS EXHIBIT ESTABLISHES

*Commands arrest for 'a technical violation' and directs that Appellant 'shall be held in custody for First Appearance Court' — against 730 ILCS 5/5-6-4(b), under which the court 'shall admit the offender to pretrial release' unless the violation is itself a criminal offense. It also bears the notation 'PD APPOINTED,' seven months after the date to which counsel was later discharged nunc pro tunc.*

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Circuit court warrant                                                                                                                  |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |



IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS

CASE  
NUMBER(S)

23CF00001146

VS.

EHAB ALLABABIDI  
8516 W. WINONA ST.  
CHICAGO, IL 60656

**WARRANT OF ARREST - VIOLATION**

To all Peace Officers of the State of Illinois:

You are hereby commanded to arrest **EHAB ALLABABIDI** and bring said person without unnecessary delay before the judge sitting in First Appearance Court in the Circuit Court of the 19th Judicial Circuit, Lake County, Illinois, to answer a charge made against said person for a technical violation while on for the following offense(s):

AGG RECKLESS DRVG/BODILY HARMSPEEDING 35+ MPH OVER LIMIT

The defendant shall be held in custody for First Appearance Court.

Issued at Lake County, Illinois on 05/28/2026

  
\_\_\_\_\_  
JUDGE

PD APPOINTED  
ARRESTING  
AGENCY:  
Lincolnshire



|                                |              |           |                |             |        |          |
|--------------------------------|--------------|-----------|----------------|-------------|--------|----------|
| DOB: 09/24/1996                | Race:        | Sex: Male | Hair: Brown    | Eyes: Brown | HGT: 6 | WGT: 200 |
| Driver's License: A41120096272 | DL State: IL | SSN:      | State ID:      |             |        |          |
| Vehicle Reg:                   | Veh Make:    | Year:     | License Plate: |             |        |          |

|                     |        |        |     |     |
|---------------------|--------|--------|-----|-----|
|                     |        |        |     |     |
| Last Name           | First  | Middle |     |     |
| Street, RR, Box No. |        |        |     |     |
| City                | State  |        |     |     |
| Charge/Code         | D.O.W. |        |     |     |
| Sex                 | Race   | D.O.B  | Ht. | Wt. |
| Hair                | Eyes   | D.L.#  |     |     |

|           |      |      |    |
|-----------|------|------|----|
| (In) Book | Tube | Date | By |
|-----------|------|------|----|

|            |      |      |    |
|------------|------|------|----|
| (Out) Book | Tube | Date | By |
|------------|------|------|----|

|          |      |
|----------|------|
| IN LEADS | Date |
|----------|------|

|         |      |
|---------|------|
| IN NCIC | Date |
|---------|------|

|                |    |
|----------------|----|
| Cancelled Date | By |
|----------------|----|

State of Illinois )  
County of Lake ) SS.

I have duly executed the within writ by reading the same to and arresting the within  
named \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_  
at \_\_\_\_\_ o'clock \_\_\_\_\_ .M, as I am herein commanded \_\_\_\_\_  
Sheriff By \_\_\_\_\_

Fee \$ \_\_\_\_\_

# EXHIBIT M

JUNE 17, 2026 COURT MINUTES

**WHAT THIS EXHIBIT ESTABLISHES**

*Classifies the event as 'Status'; records Appellant present via video; lists Bailey Russell, Public Defender, as present; states 'WARRANT WILL NOT BE QUASHED'; and records an 'Oral Motion TO LIFT STAY ON JAIL SENTENCE' marked 'Granted.' No evidence, witness, stipulation, admission, or finding is recorded.*

**SOURCE AND AUTHENTICATION**

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Circuit court minutes                                                                                                                  |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |



IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

|                      |   |                                   |
|----------------------|---|-----------------------------------|
| People               | ) |                                   |
|                      | ) |                                   |
| Plaintiff,           | ) | Case No. 23CF00001146             |
| v.                   | ) | Location: Courtroom 611           |
|                      | ) | Event Date: June 17, 2026 9:00 AM |
| PEOPLE VS ALLABABIDI | ) | Event Type: Status                |
| Defendant.           | ) |                                   |
|                      | ) | Clerk: Johanna B                  |

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Guilty  
09/08/2025

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Nolle Prosequi  
09/08/2025

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
ECR Specialist, Lake County Court Reporters  
Nicholas Shepherd, States Attorney  
Bailey Russell, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Appellant, Defendant present via video

**Nature of Proceedings:**

Event Result: Heard 06/17/2026.  
Public Defender Discharged  
WARRANT WILL NOT BE QUASHED  
Oral Motion  
TO LIFT STAY ON JAIL SENTENCE  
Granted  
Order Entered

# EXHIBIT N

## JUNE 17, 2026 ORDER LIFTING THE STAY OF THE 180-DAY JAIL TERM

### WHAT THIS EXHIBIT ESTABLISHES

*The order under review, in one operative sentence. It states no violation found, no evidence relied on, no burden applied, no ability-to-pay or willfulness determination, no counsel waiver, and no reason. File-stamped June 18, 2026 at 10:48 a.m., the day after the hearing.*

### HOW THIS EXHIBIT FITS THE RECORD

The order under review, entire. Every element section 5-6-4 requires before imprisonment — a violation found, evidence, the State’s burden carried, a willfulness determination, a counsel waiver — is absent from its face. Exhibit M shows how it was obtained: an oral motion at a proceeding captioned “Status.” Exhibit O shows what happened the same afternoon to the counsel the minutes list as present.

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Order appealed from                                                                                                                    |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

IN THE CIRCUIT COURT OF THE NINETEENTH  
JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS

Erin Cartwright Weinstein  
**Clerk of the Court**  
Lake County, Illinois

PEOPLE OF THE STATE OF ILLINOIS

VS.

**EHAB ALLABABIDI**

GEN. NO. 23CF00001146

**ORDER**

This matter coming before this Honorable Court with the Court being fully advised of the premises. It is so ordered:

1. The stay of the 180 day Lake County Jail term of the defendant's sentence is hereby lifted.

Enter:

Dated: June 17, 2026

  
\_\_\_\_\_  
J U D G E



# EXHIBIT O

JUNE 17, 2026 ORDER DISCHARGING THE PUBLIC DEFENDER NUNC PRO TUNC TO OCTOBER 6, 2025

## WHAT THIS EXHIBIT ESTABLISHES

*Discharges the Lake County Public Defender as attorney of record 'Nunc pro tunc to October 6, 2025,' file-stamped 2:50 p.m. on June 17, 2026. Neither public-defender-fee checkbox is marked. It establishes that Appellant was unrepresented on July 9, 2026 for Rule 606(a) purposes, and it cannot be reconciled with the same court's appointment of counsel by the May 28, 2026 warrant.*

## HOW THIS EXHIBIT FITS THE RECORD

The counsel record cannot be reconciled, and this order is why. It erases representation back to October 6, 2025 — but the same court appointed the Public Defender by the warrant at Exhibit L on May 28, 2026, seven months later; probation directed a copy of Exhibit U to a “Defense Attorney” in April 2026; and the minutes at Exhibit M list that office as present on the very day this order issued. Read with Exhibit V, it also establishes the premise Rule 606(a) turns on: that Appellant was unrepresented when he requested this appeal.

## SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Circuit court order                                                                                                                    |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

STATE OF ILLINOIS )  
 )SS  
COUNTY OF LAKE )

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

IN THE CIRCUIT COURT OF THE NINETEENTH  
JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS )

vs. )

General No. 23CF1146 )

Ehab Allababidi )

## ORDER

### Public Defender Withdraw/Discharge

**It is Hereby Ordered** that the Lake County Public Defenders is discharged as attorney of record in the above-entitled cause;

Nunc pro tunc to October 6, 2025

Dated at Waukegan, Illinois, this 17 day of June, A.D., 2026:

ENTERED

Judge

- ☐ Pursuant to a hearing held in this matter, a Public Defender Fee in the amount of \$\_\_\_\_\_ is hereby ordered.
- ☐ Pursuant to a hearing held in this matter, it has been determined that no Public Defender Fee shall be assessed.

# EXHIBIT P

JULY 23, 2026 FILE-STAMPED RULE 609(A) MOTION IN THE CIRCUIT COURT

**WHAT THIS EXHIBIT ESTABLISHES**

*Stay relief was first requested in the circuit court, satisfying the ordinary sequencing expectation for a Rule 609 application here. No ruling has been entered.*

**SOURCE AND AUTHENTICATION**

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Circuit court filing                                                                                                                   |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS — CRIMINAL DIVISION**

**PEOPLE OF THE STATE OF ILLINOIS,***Plaintiff,*

v.

**EHAB ALLABABIDI,***Defendant.***No. 23 CF 1146**Circuit Court, 19th Judicial Circuit  
Lake County, Illinois**Hon. Christopher R. Stride**

Presiding Judge

JUL 23 2026

Em. Motion  
Circuit Clerk

FILED

**EMERGENCY MOTION UNDER RULE 609(a) FOR STAY OF THE  
JUNE 17, 2026 CUSTODY ORDER PENDING APPEAL, FOR RECALL OF THE  
MAY 28, 2026 WARRANT OR ITS CONVERSION TO A SUMMONS, AND  
FOR ADMISSION TO BAIL ON RECOGNIZANCE**

*Ill. S. Ct. Rules 609(a), 604(b), 606; 730 ILCS 5/5-6-4; presented to any judge authorized to act*

**REQUESTED DOCKET EVENT:** Emergency Motion. This document is a court filing tendered for docketing. It is not correspondence.

**I. RELIEF REQUESTED, PRECISELY**

- (1) A stay, under Rule 609(a), of the June 17, 2026 order lifting the stay of the 180-day Lake County Jail term, pending disposition of the appeal perfected by the Notice of Appeal tendered with the accompanying Rule 606(a) written request;
- (2) Admission to bail on Defendant's own recognizance — Rule 609(a) authorizes a stay "with or without bond" — subject to the September 8, 2025 probation conditions;
- (3) Recall or quashal of the May 28, 2026 no-bond warrant while the stay is in effect, or, in the alternative, its conversion to a summons or notice to appear — the instrument 730 ILCS 5/5-6-4(a) equally authorizes — with Defendant's verified commitment to appear in person or by remote appearance on any date set;
- (4) Immediate transmission of any stay or recall order to the Lake County Sheriff, the Lincolnshire Police Department, and the LEADS/warrant custodian; and
- (5) If the Court does not grant the stay on the papers, an emergency hearing at which Defendant may appear by video, as he did on June 17, 2026.

**II. THE EMERGENCY**

A 180-day jail term is active and a no-bond warrant is outstanding, so Defendant is subject to arrest at any hour, and every act of self-help the law offers — including appearing in a courthouse to be heard — carries custody as its price. The Rule 606(b) period for the appeal ends **July 17, 2026**. Absent a stay, an indigent probationer will serve a substantial part of a 180-day term before any reviewing court can act — a harm no later order can undo.

### III. THIS COURT'S AUTHORITY IS EXPRESS, AND THIS MOTION THREATENS NO PART OF THE APPEAL

Rule 609(a) provides in terms:

"If an appeal is taken ... from an order revoking or modifying the conditions attached to a sentence of probation or conditional discharge and imposing a sentence of imprisonment or periodic imprisonment, the defendant may be admitted to bail and the sentence or condition of imprisonment or periodic imprisonment stayed, with or without bond, **by a judge of the trial or reviewing court.**" Ill. S. Ct. Rule 609(a).

The trial court is therefore an expressly proper stay forum *after* the appeal is taken. Nor does this motion disturb appellate jurisdiction: a Rule 609(a) stay application is collateral to the judgment appealed from, and a circuit court retains authority over matters collateral or incidental to the judgment after a notice of appeal is filed. *General Motors Corp. v. Pappas*, 242 Ill. 2d 163, 173—74 (2011). For the same reason, **this motion is not a postjudgment motion directed against the June 17 judgment** within the meaning of Rule 606(b): it does not ask this Court to reconsider, vacate, or modify that order — those questions belong to the Appellate Court in the perfected appeal — and it therefore has no effect on the notice of appeal. Defendant expressly reserves all merits challenges for the reviewing court.

### IV. GOOD CAUSE: THE ORDER STANDS ON A RECORD THE STATUTE FORBIDS

**A. The statute.** Section 5-6-4 of the Unified Code of Corrections governs the activation of custody on an alleged probation violation, and it speaks in commands. On the hearing:

"The court shall conduct a hearing of the alleged violation." 730 ILCS 5/5-6-4(b).

On the State's burden and the offender's rights at that hearing:

"The State has the burden of going forward with the evidence and proving the violation by the preponderance of the evidence. ... The offender shall have the right to be represented by counsel and shall have the right to confront and cross-examine adverse witnesses." 730 ILCS 5/5-6-4(c).

And on nonpayment — the predicate the State swore here:

"Probation, conditional discharge, periodic imprisonment and supervision shall not be revoked for failure to comply with conditions of a sentence or supervision, which imposes financial obligations upon the offender **unless such failure is due to his willful refusal to pay.**" 730 ILCS 5/5-6-4(d).

The federal floor is the same: *Gagnon v. Scarpelli*, 411 U.S. 778, 786 (1973), and *Morrissey v. Brewer*, 408 U.S. 471, 488—89 (1972), require notice, an evidentiary hearing, and written findings before conditional liberty becomes custody; *Bearden v. Georgia*, 461 U.S. 660, 672—73 (1983), forbids jailing for nonpayment without an inquiry into ability to pay and a willfulness finding; *Mempa v. Rhay*, 389 U.S. 128 (1967), and *Gagnon* secure counsel at the proceeding; Illinois has followed this line since *People v. Beard*, 59 Ill. 2d 220, 226 (1974).

**B. The record.** The June 17, 2026 minutes describe a **status call**, not a hearing: no witness, no exhibit, no evidence received, no willfulness finding. The entirety of what the minutes record, in the same breath (Apps. L, Q):

“Public Defender Discharged”

“WARRANT WILL NOT BE QUASHED”

“Oral Motion TO LIFT STAY ON JAIL SENTENCE Granted” (June 17, 2026 minute record, App. Q.)

Custody was thus activated at a proceeding at which the statutory rights to a hearing, to the State’s proof, and to counsel were simultaneously absent — the offender lost his lawyer at the very moment the statute guaranteed him one. If a transcript later supplies process the minutes omit, the State can produce it in response to this motion; on the record that exists, the silence is the emergency.

**C. The predicates.** The sworn petition’s two custodial predicates are contradicted by the State’s own files, mapped allegation-by-allegation in the Petition Allegation Matrix (Shared Appendix, page 3): the supervising officer adjudicated the identical amphetamine screen in writing on December 10, 2025, five months before the petition swore it was an “illegal substance”:

“Your drug test results were positive for amphetamine, but **it is all negative in my eyes because I know you are still taking the Adderall.**” (Officer Adison Weeks, Dec. 10, 2025, App. E.)

Meanwhile, the willful-nonpayment allegation was sworn against a sentencing record that set the principal restitution claim at zero dollars after an insurer paid \$16,557 on the loss (App. G), with no ability-to-pay inquiry of any kind — the precise practice section 5-6-4(d) and Bearden prohibit. These points are recited to show probable merit and good cause for a stay, not to ask this Court to adjudicate them.

**D. The setting, stated as dated fact.** On June 6, 2026, Defendant submitted for filing a federal civil-rights action arising from this prosecution, now *Allababidi v. Shepherd*, No. 1:26-cv-06738 (N.D. Ill.), naming as individual-capacity defendants — among others — the assistant State’s attorney who personally swore the May 14, 2026 petition. On June 15, 2026, Defendant’s file-stamped omnibus filing, which attached that federal complaint, was served and entered on this docket as “Correspondence”. The notice was neither single nor subtle: a litigation-hold notice concerning these matters was served on the office and on the swearing assistant personally by email on May 22–23, 2026; at 7:00 a.m. on May 28, 2026 — two hours before the warrant hearing — Defendant emailed the swearing assistant and the office the Weeks clearance itself (App. I); and further written notices followed on June 7 and June 8, 2026. Two days after the June 15 service, on June 17, custody was activated on the State’s oral motion at a status call. Defendant pleads the sequence and its dates; their weight is for the reviewing court. The structural consequences travel on their own instruments filed herewith: a verified petition for appointment of a special prosecutor under 55 ILCS 5/3-9008(a-10), and a verified renewed motion for substitution of judge for cause under 725 ILCS 5/114-5(d). Neither is a condition of the stay; the stay is warranted on the statutory defects alone.

---

**V. THE WARRANT: THE STATUTE OFFERS A LESS DESTRUCTIVE INSTRUMENT**

Section 5-6-4(a) lets a court secure an alleged violator's appearance by **notice or summons as readily as by warrant**. Defendant is not a flight risk on this record: his address has been verified and of record throughout; he appeared by video at the June 17 proceeding itself (App. Q, minutes: defendant "present via video"); he transmitted the exculpatory records to the court and the State at 7:00 a.m. on the morning of the warrant hearing (App. I); and he has litigated openly and continuously in every forum since. A no-bond warrant against a documented, reachable, appearing defendant serves no statutory purpose a summons would not serve without the custody. The Court is asked to recall the warrant during the stay or convert it to a summons/notice to appear with a date certain.

---

**VI. THRESHOLD ROUTING UNDER 725 ILCS 5/114-5(d)**

The June 15, 2026 file-stamped omnibus filing (docketed as "Correspondence"; see the companion docket-correction motion) includes a substitution-for-cause demand under 725 ILCS 5/114-5(d). By its text, such a motion "shall be heard as soon as possible by a judge not named in the motion", and orders entered after an improperly denied substitution motion are void. In re Dominique F., 145 Ill. 2d 311, 324 (1991). Defendant therefore does not ask any judge named in that demand to decide it or to make any adverse merits ruling before the threshold routing occurs. But section 114-5(d) is a routing rule, not a paralysis rule: it does not disable a **judge not named** — the presiding judge, a duty judge, or any other authorized judge — from entering the collateral, status-quo-preserving relief this motion seeks. This motion is addressed to any judge lawfully able to act on it.

---

**VII. PRIOR AND RELATED PROCEEDINGS, DISCLOSED**

So that no ruling issues on an incomplete picture: the Supreme Court of Illinois denied discretionary leave for an original mandamus (No. 133295, July 6, 2026) and denied an emergency supervisory order (No. 133301, June 26, 2026), both without opinion, after allowing fee waivers on indigency in both matters on June 25, 2026 (Apps. O, P); a mandamus petition, No. 133342, is pending there; two federal actions are pending in the Northern District of Illinois (Nos. 1:26-cv-06738 and 1:26-cv-01077), the latter of which abstained in deference to the state courts; and the Supreme Court of the United States denied an emergency application (No. 25A1406, June 22, 2026) (App. R). **No court anywhere has adjudicated the validity of the June 17, 2026 order or ruled on any motion Defendant has filed in this case.** Discretionary denials adjudicate nothing. This motion is the first Rule 609(a) application presented to any judge of this circuit.

---

**VIII. ANTICIPATED GROUNDS OF DENIAL, EACH ANSWERED**

(1) **"The appeal divests this Court of authority."** Rule 609(a) says the opposite in terms: the stay may issue "by a judge of the trial or reviewing court" when the appeal is taken, and stay applications are collateral matters over which the circuit court retains jurisdiction. Pappas, 242 Ill. 2d at 173—74.

(2) **“No appeal is perfected yet.”** The Notice of Appeal is tendered with a Rule 606(a) written request that obligates the Clerk to file it forthwith; Rule 373(c) fixes the tender date; and warrant-recall/summons-conversion relief rests independently on 730 ILCS 5/5-6-4(a) and the Court’s inherent authority over its own process, which require no appeal at all.

(3) **“No relief while a warrant is outstanding.”** Any disentitlement principle addresses flight. This record shows the opposite of flight: a verified address, a video appearance at the June 17 proceeding itself, same-morning evidentiary transmissions to the court and the State, and continuous open litigation. The warrant is also itself the contested process; conditioning review of it on surrender to it is the Catch-22 the stay power exists to prevent.

(4) **“The substitution demand means no judge can act.”** Section 114-5(d) bars the *named* judge from deciding the substitution and from adverse merits rulings; it does not bar a not-named judge from collateral, temporary relief. In re Dominique F. makes the cost of ignoring the routing rule — voidness — a reason to route, not a reason to deny.

(5) **“These arguments belong to the Appellate Court.”** The merits do, and this motion sends them there. The stay does not: Rule 609(a) makes this Court a proper stay forum, and the statutory defects are recited only as good cause. A written ruling either way creates the reviewable record; what the rules do not contemplate is no ruling at all.

---

## IX. CONCLUSION

The stay requested restores the exact status quo of June 16, 2026 — probation, out of custody — while a reviewing court examines an order that activated 180 days of jail at a status call, without evidence, without findings, and without counsel. The People lose nothing a summons cannot protect; Defendant loses months of liberty no reversal can return. The proposed order follows.

**VERIFICATION (735 ILCS 5/1-109).** Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct, except as to matters stated to be on information and belief, which I certify I verily believe to be true, and that documents cited from the Shared Appendix are true and correct copies of what they purport to be.

**CERTIFICATE OF SERVICE (Rule 12(b)(6); 735 ILCS 5/1-109).** I certify that on July 10, 2026 I served a true copy of this filing and the Shared Appendix on the Lake County State’s Attorney, 18 N. County St., Waukegan, IL 60085, by U.S. Mail, postage prepaid, and by email to [statesattorney@lakecountyil.gov](mailto:statesattorney@lakecountyil.gov).

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI, Defendant, Pro Se**  
8516 W. Winona St., Chicago, IL 60656



(773) 920-0030 | defcon5ready@gmail.com

Dated: July 10, 2026

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS — CRIMINAL DIVISION

People v. Allababidi, No. 23 CF 1146

PROPOSED ORDER — RULE 609(a) STAY PENDING APPEAL

This matter coming before the Court on Defendant's Emergency Rule 609(a) Motion, due notice having been given, and the Court being advised, IT IS ORDERED:

1. The Emergency Motion is: ☐ ALLOWED ☐ DENIED.
2. Enforcement of the June 17, 2026 order lifting the stay of the 180-day jail term is STAYED pending disposition of Defendant's appeal or further order. Defendant is admitted to bail: ☐ on his own recognizance, without bond ☐ upon bond of \$\_\_\_\_\_, subject to the September 8, 2025 probation conditions.
3. The May 28, 2026 warrant is: ☐ recalled/quashed while the stay is in effect ☐ converted to a summons/notice to appear on \_\_\_\_\_, 2026, at which Defendant may appear in person or by video.
4. If the assigned judge is named in the pending June 15, 2026 substitution-for-cause demand, that threshold demand is routed under 725 ILCS 5/114-5(d) for hearing by a judge not named; the relief above remains in effect pending that routing.
5. The Clerk shall immediately transmit this order to the Lake County Sheriff, the Lincolnshire Police Department, the LEADS/warrant custodian, and the Lake County State's Attorney, and shall confirm transmission on the docket.
6. Entered without prejudice to any party's right to seek modification under Rule 609(a).

ENTERED: \_\_\_\_\_, 2026

\_\_\_\_\_  
JUDGE

FILED

JUL 23 2026

2nd District  
Circuit Court

# EXHIBIT Q

JULY 23, 2026 FILE-STAMPED RULE 607 MOTION IN THE CIRCUIT COURT

## WHAT THIS EXHIBIT ESTABLISHES

*The pending request for an indigency finding, appellate counsel, and a report of proceedings without charge. No ruling has been entered.*

## SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Circuit court filing                                                                                                                   |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS — CRIMINAL DIVISION**

**PEOPLE OF THE STATE OF ILLINOIS,**

*Plaintiff,*

v.

**EHAB ALLABABIDI,**

*Defendant.*

**No. 23 CF 1146**

Circuit Court, 19th Judicial Circuit  
Lake County, Illinois

**Hon. Christopher R. Stride**

Presiding Judge

**FILED**  
**JUL 23 2026**  
CLERK OF COURT  
LAKE COUNTY, ILLINOIS

**MOTION FOR THE INDIGENCY AND REPRESENTATION  
DETERMINATIONS RULE 607 REQUIRES: APPOINTMENT OF COUNSEL  
ON APPEAL AND FREE REPORT OF PROCEEDINGS**

*Ill. S. Ct. Rules 607(a), 607(b); Griffin v. Illinois; Douglas v. California*

**REQUESTED DOCKET EVENT:** Motion. This document is a court filing tendered for docketing. It is not correspondence.

**I. RELIEF REQUESTED**

Upon the filing of the Notice of Appeal tendered with the accompanying Rule 606(a) written request, Defendant asks the Court to perform the determinations Rule 607 makes mandatory in exactly this posture: (1) find Defendant indigent; (2) appoint counsel on appeal — the Office of the State Appellate Defender is the ordinary appointee; and (3) order the court reporting personnel to transcribe, certify, and file, without cost to Defendant, the report of proceedings for June 17, 2026 and May 28, 2026.

**II. THE DUTY IS MANDATORY AND THE POSTURE IS EXPRESS IN THE RULE**

Rule 607(a) applies by name to a case “in which a sentence of probation ... has been revoked or the conditions attached to such a sentence modified and a sentence of imprisonment or periodic imprisonment imposed”: upon the filing of a notice of appeal, “the circuit court shall determine whether the defendant is represented by counsel on appeal”, and if the defendant is indigent and desires counsel, “the court shall appoint counsel on appeal”. Rule 607(b) then directs that, upon a finding of indigency, court reporting personnel “shall transcribe, certify, and file the report of proceedings”. The constitutional floor is half a century older: an indigent criminal appellant is entitled to a free transcript, *Griffin v. Illinois*, 351 U.S. 12, 19 (1956), and to appointed counsel on a first appeal of right, *Douglas v. California*, 372 U.S. 353, 357 (1963).

**III. THE INDIGENCY RECORD IS ALREADY MADE**

The Supreme Court of Illinois adjudicated Defendant’s indigency twice within the past three weeks, allowing his applications for waiver of that Court’s fees by orders of June 25, 2026 in Nos. 133295 and 133301 (Apps. O). The county’s own probation system suspended \$1,400 of his service

fees for indigency on November 10, 2025. Defendant is unrepresented because the Public Defender was discharged on June 17, 2026 — at the same proceeding that activated the custody now under appeal — and he desires counsel on appeal. Every element of Rule 607(a) is therefore satisfied on existing records, and the June 17 and May 28 transcripts are the core of the appellate record: they will show what the minute orders show or they will not, and either answer is indispensable to review.

---

#### IV. REQUESTED ORDER

- (1) Defendant is found indigent for purposes of Rules 607(a) and 607(b);
- (2) The Office of the State Appellate Defender (or other counsel) is appointed to represent Defendant on appeal;
- (3) Court reporting personnel shall transcribe, certify, and file the report of proceedings for June 17, 2026 and May 28, 2026 without cost to Defendant, as directed by Rule 607(b); and
- (4) The Clerk shall prepare and certify the record on appeal and transmit notice of these determinations to Defendant and appointed counsel.

**VERIFICATION (735 ILCS 5/1-109).** Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct, except as to matters stated to be on information and belief, which I certify I verily believe to be true, and that documents cited from the Shared Appendix are true and correct copies of what they purport to be.

**CERTIFICATE OF SERVICE (Rule 12(b)(6); 735 ILCS 5/1-109).** I certify that on July 10, 2026 I served a true copy of this filing and the Shared Appendix on the Lake County State's Attorney, 18 N. County St., Waukegan, IL 60085, by U.S. Mail, postage prepaid, and by email to [statesattorney@lakecountyil.gov](mailto:statesattorney@lakecountyil.gov).

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI**, Defendant, Pro Se  
8516 W. Winona St., Chicago, IL 60656  
(773) 920-0030 | [defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)  
Dated: July 10, 2026

FILED  
JUL 23 2010  
U.S. District Court  
District of Columbia

# EXHIBIT R

JULY 23, 2026 NOTICE OF THE AUGUST 6, 2026 COURT DATE

**WHAT THIS EXHIBIT ESTABLISHES**

*A generic future setting on the same date the docketing statement is due in this Court. It is not a ruling on any pending motion and not authorization to appear remotely.*

**SOURCE AND AUTHENTICATION**

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Circuit court notice                                                                                                                   |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |





IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

FILED

2025 AUG 11 10 11 AM

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

EHAB ALLABABIDI  
8516 W. WINONA ST.  
CHICAGO, IL 60656

PEOPLE VS ALLABABIDI

Case No. 23CF00001146

NOTICE OF COURT DATE

On court's own motion, you are hereby required to appear on  
August 6, 2026 at 9:00 a.m. in  
Courtroom 611  
18 N County Street  
Waukegan, IL 60085  
for

Motion Of Defendant

*Erin Cartwright Weinstein*

Erin Cartwright Weinstein  
Clerk of the Circuit Court

By Deputy Clerk: Michelle G  
Phone No.(847) 377-3380

Dated: 07/23/2026



**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS**

# EXHIBIT S

## ALLSTATE RESPONSE TO ILLINOIS DEPARTMENT OF INSURANCE COMPLAINT NO. 01124092

### WHAT THIS EXHIBIT ESTABLISHES

*The insurer's own account, filed with a state regulator on July 20, 2026. It states that Allstate paid \$16,557.00 on Claim No. 0670868884 on the principal property loss; that the policy carried \$100,000 in property damage limits; that Allstate 'retained defense counsel' to reach the State's Attorney and the public defender to resolve the restitution and that 'no one will respond or cooperate'; that it is 'not unwilling still to take care of this payment'; that 'no one from the State Attorney's Office will give any information to Allstate or its counsel'; that the State's Attorney is in some instances unwilling to accept insurer payment; and that Allstate 'cannot determine when the payment was due.'*

### VISIBLE ON THE FACE OF THE DOCUMENT

- Allstate paid **\$16,557.00** on Claim No. 0670868884 on the principal property loss before sentencing; the policy carried **\$100,000** in property damage limits.
- Allstate “retained defense counsel ... to see if counsel could reach out to the State’s Attorney and the public defender to resolve this ... but **no one will respond or cooperate.**”
- “**No one from the State Attorney’s Office will give any information to Allstate or its counsel.**”
- Allstate is “**not unwilling still to take care of this payment**” and “**cannot determine when the payment was due.**”
- The letter identifies the prosecution as **Lake County Case No. 23 CF 00001145**. This case is **No. 23 CF 00001146**. The insurer that says it could not obtain information from the State’s Attorney was working from a case number that is not this case’s number.

### HOW THIS EXHIBIT FITS THE RECORD

The willfulness allegation fails on this document alone. The insurer confirms it paid the principal loss before sentencing, which is why Exhibit I-3 carries no restitution figure; states it retained counsel to pay the remaining sum and could not obtain a response from the State’s Attorney or the Public Defender; and identifies the prosecution by a case number that is not this case’s number. Section 5-6-4(d) asks whether nonpayment was a willful refusal by the defendant. On this account the money was available and the refusal was elsewhere.

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Insurer regulatory filing                                                                                                              |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

July 20, 2026

**RESPONSE SENT VIA: IL HELP CENTER**

Attn: Maileen  
Consumer Services Division  
Illinois Department of Insurance  
320 W. Washington Street  
Springfield, IL 62767

|                    |                                              |
|--------------------|----------------------------------------------|
| IDOI File No.:     | 01124092                                     |
| Complainant:       | Ehab Allababidi                              |
| Policyholder:      | Ehab Allababidi                              |
| Policy No.:        | 802 748 890                                  |
| Product Type:      | Automobile Policy                            |
| Policy Form:       | ACR65-00                                     |
| Respondent:        | Allstate Fire and Casualty Insurance Company |
| Date of Loss:      | May 22, 2022                                 |
| Allstate Claim No: | 0670868884                                   |

Response Due Date: July 17, 2026 (extension secured until July 24, 2026)

Dear Maileen:

Thank you for allowing Allstate Fire and Casualty Insurance Company (hereinafter “Allstate”) the opportunity to respond to the instant IDOI Complaint filed by Ehab Allababidi in relation to a revocation of sentencing that was initiated by the States Attorney in behalf of the People of the State of Illinois in a pending criminal case. Allstate is being faulted for not paying a property damage claim as part of this restitution in behalf of Mr. Allababidi. Mr. Allababidi expects Allstate to now paid said unreported PD claim and now and brings this to the attention of the Illinois Department of Insurance. Allstate responds as follows:

**A. Introduction and Background.**

This IDOI Complaint submitted by the Allstate insured, Ehab Allababidi, stems from a motor vehicle accident on May 23, 2022 at or near Illinois Route 22 and Old Mill Road in Vernon Township, Lake County, Illinois, wherein he caused alleged property damage to several parties and/or entities.

Allstate opened the claim under 0670868884. Allstate did not deny coverage to anyone. In fact, as pointed out by claimant/insured, Allstate paid out the one property claim that was pressed by Sentry Insurance in the sum of \$16,557.00. No other claims to date were presented by any persons, individuals, or insurance companies for alleged property damage. Mr. Allababidi never put Allstate on notice of any other such property claims against him. While Allstate adjusted the Sentry Insurance property claim from the standpoint of assuming the insured’s alleged civil liability, it did not nor could it be involved in any admission as to criminal conduct, charges, or sentencing.

At the time of the loss, the vehicle operated by Mr. Allababidi was covered by Allstate Policy No. 802 748 890, which carried \$100,000 in property damage limits.

Because the date of loss is May 23, 2022, any party seeking recovery for property damage would have 5 years to file suit. At the time of this IDOI complaint, no suits are pending and the SOL does not expire until May 23, 2027. If suits were filed, Allstate would have defended and indemnified the insured (Mr. Allababidi), and possibly even tried to settle. If suits were not settled, Allstate would retain house or panel counsel to defend the insured. Allstate did not dispute civil liability and it was a question of who was pressing recovery claims. No claims were ever pressed. Certainly at no time was Allstate presented with any property damage loss of O'Brien Landscape, an entity to whom restitution was awarded by the State, in the sum of \$2,670.86.

## **B. The Criminal Case and Restitution Order.**

It appears from the Complaint and Allstate's investigation to date, that the State prosecuted a criminal case against Mr. Allababidi, Lake County Case No. 23 CF 00001145. Mr. Allababidi was charged with:

1. AGG RECKLESS DRVG/BODILY HARM 625 ILCS 5/11-503(a)(1)  
Class 4 Felony;
2. SPEEDING 35+ MPH OVER LIMIT 625 ILCS 5/11-601.5(b)  
Class A Misdemeanor.

This criminal suit was never tendered to Allstate, nor would it be as Allstate would not defend a criminal case. The policy's insuring agreement covers civil claims for alleged property damage and/or alleged bodily injury (including death). Defense of criminal cases are not covered

Allstate learned since the filing of this IDOI Complaint, that Mr. Allababidi was defended by a public defender in the criminal case. Mr. Allababidi pled guilty to AGG RECKLESS DRVG/BODILY HARM 625 ILCS 5/11-503(a)(1) (Class 4 Felony).

As part of that judgment order entered on September 8, 2025, the People (with the State's Attorney's agreement), entered a restitution order against Mr. Allababidi to compensate one property damage victim, **to wit:** O'Brien Landscaping for \$2,670.86. This was part of the plea deal agreed to by Mr. Allababidi. Mr. Allababidi agreed to these terms and restitution. He also agreed to 30 months' probation. Allstate cannot determine when the payment was due. The Insured may still have time because his probation was for 30 months.

## **C. The Restitution Was Not [Timely] Paid.**

It is hard to interpret Mr. Allababidi's grievance against Allstate per se. It seems that Mr. Allababidi believed that this restitution would be paid directly by Allstate and the State's Attorney should have sought payment directly from Allstate. Because it was not timely paid, Mr. Allababidi was served on May 12, 2026 with a petition to revoke his probation and risks incarceration. There is no scheduled hearing date.

Again, Allstate was not involved in, nor aware until recently, of the outcome of Mr. Allababidi's criminal case or the details of same. Allstate has no obligation to pay this restitution claim. This was not a civil penalty of any kind. This was not tendered to Allstate to defend or pay at any time. This IDOI Complaint is Allstate's first notice of Mr. Allababidi's plea deal and this restitution judgment. From reading the IDOI Complaint, Mr. Allababidi expects and expected this to be paid by Allstate because Allstate paid a civil property damage settlement to Sentry Insurance property claim under the terms of Policy No. 802 748 890. That was not a restitution sentencing order.

It is not entirely clear if the insured is notifying the DOI to take any action against Allstate. He appears to want this Department to look into this further as to why the State's Attorney never sought to have this paid directly by Allstate. Surely, Allstate cannot be faulted for paying something it never was asked to pay, by the State's Attorney, by Mr. Allababidi or anyone in his behalf, or by O'Brien Landscape.

#### **D. Restitution is Not a Claim for PD or BI.**

As the IDOI is aware, a restitution claim is something that is part of a criminal sentencing to deter a defendant from future criminal conduct. It is not a claim for BI or PD covered in a personal auto policy.

Restitution is a legal remedy that requires a wrongdoer to give back what he/she gained or compensate for what the victim lost, with the goal of restoring the victim to his/her pre-loss position. It is most commonly ordered as part of a criminal sentence when defendant is found guilty of a crime and the court decides to impose payment to the victim. For example, in a criminal case for assault or theft, restitution might cover medical bills, property damage, or lost wages directly tied to the crime. Apparently in this criminal sentencing involved repayment of property damaged in the vehicle accident.

In the civil setting, a claim for BI or PD seeks compensation, not restitution through a judgment or settlement, not a restitution order as here. The restitution agreed to in this case involved payment owed by defendant (not his insurance company) as part of a sentence.

In the past when claimants or their criminal lawyer asked Allstate to pay the restitution, Allstate was at least aware of same. It was not aware here. This IDOI Complaint is the first notice of any such demand for payment. Mr. Allababidi complains that because Allstate covered the loss and because the State never sought it to be paid directly from Allstate, he knows will suffer the consequences of revocation of his plea deal. As we understand, there is a petition pending to do just that. This is what prompted the filing of this IDOI Complaint and also a federal discrimination case (1:26-cv-06738, Northern Dist. of Illinois), naming the State's Attorney and others. This has nothing to do with this IDOI complaint, Allstate is not named as a defendant in the discrimination case. It is named in the IDOI Complaint which it is now required to answer.

Actually, the policy very clearly forbids an insured to enter into any voluntary settlement or judgment and then seek repayment from Allstate. Specifically the policy provides:

Allstate is not denying coverage now for that reason since this was not even a civil settlement or judgment. Again, Mr. Allababidi agreed to the restitution terms and did nothing to pay it and never told Allstate about it. Mr. Allababidi's own conduct precipitated the pending petition for revocation. Neither did the public defender or the State. The fact that it is not paid as the insured agreed to by a date certain is why the insured now risks his plea deal and may face incarceration.

**E. Allstate's Practice and Procedures as to Restitution.**

More often than not, a restitution payment may be denied by personal liability insurer as not being covered without any repercussions. It is very rare for a criminal lawyer defending an insured in a criminal case with civil exposure as well, to seek payment of the restitution claim. Sometimes this is during the pendency of civil cases, sometimes not. For example, when there are murder charges pending against a driver and there is a likelihood of a restitution award (voluntary or not), Allstate is generally very careful in settling wrongful death cases not to release this remedy to the victim families in the criminal case by a broadly worded "any and all claims." It is not unprecedented for the People and Allstate (through its defense counsel) to get together to see if perhaps insurance payment could resolve this controversy. That is not what happened here.

Also, in the past when Allstate approached the parties, counsel, and the court in a criminal case to pay restitution, the judge was not willing to allow this because it was not paid out of pocket and served no deterrence to defendant from future conduct.

**F. Allstate's Present Position in Connection with Reimbursing the Property Damage Victim the Restitution the Insured Himself Agreed to Pay.**

Allstate does not know presently what the State's Attorney or the property damage victim, O'Brien Landscape, will agree to. Again, Allstate retained defense counsel upon receipt of the DOI Complaint to see if counsel could reach out to the State's Attorney and the public defender to resolve this for Mr. Allababidi, but no one will respond or cooperate. Further, Allstate is aware that in some instances the State's Attorney is not willing to accept payment from any insurance company, in lieu of a personal payment from defendant because of this sentencing. Again, this is not compensation. This is restitution and intended to be paid and financed by the criminal defendant in his own behalf.

Allstate is not unwilling still to take care of this payment if it can, even though this is not a civil judgment. Again, Allstate's counsel has not been able to reach the State's Attorney to see if it could even pay this and make this right before this IDOI response was due. Allstate has not been able to reach the judgment creditor (O'Brien Landscape) either. Allstate, through counsel, is attempting to see if payment can be made but there are variables and moving parts, and before the insured's federal discrimination case put a chilling effect on these communications.

Again, Allstate is not unwilling to pay the O'Brien Landscape PD claim (now that it is aware of same), but actually it does not know if: (1) it can, (2) the State's Attorney would let this happen; and (3) what proof could even be produced to the State's Attorney to even show this satisfaction.

Again, if the State's Attorney's entire sentencing was based on Mr. Allababidi paying this out of pocket as a penalty to prevent future conduct, then Allstate may not be able to make this right, even if it is willing to.

Additionally, it would seem precipitous too, for Allstate to pay anything without proof of the damages and seeing whether this "restitution" is in fact damages that were already reimbursed by the insurance company to O'Brien Landscape. Allstate knows nothing at this time about any of this and cannot obtain any information from any of the attorneys. Because of this IDOI Complaint, counsel for Allstate did not reach out to Mr. Allababidi personally about any of this, either.

#### **G. The Time to Present Property Damage Claims Has Not Expired Yet.**

At the time of answering this IDOI Complaint, Allstate is not in receipt of any subrogation claim by the insurer for O'Brien Landscape, which is believed to be Frankenmuth Mutual. Allstate is unaware if O'Brien Landscape submitted this property claim to Frankenmuth and if so whether it paid said claim. As Allstate is led to believe, the restitution claim in favor of O'Brien Landscape was for \$2,670.86. This should be for an amount not previously paid and is a loss or out of pocket claim of O'Brien Landscape to make things right for this creditor. It would not seem that the State's Attorney would set up any restitution to reimburse a subrogation insurer. No one from the State Attorney's Office will give any information to Allstate or its counsel.

Allstate is a member of intercompany arbitration with many insurers, including Frankenmuth Mutual. If Allstate were put on notice of this subrogation claim, it would have dealt with it through intercompany arbitration. No insurer filed such a demand for recovery.

If Allstate were put on notice of any out of pocket claim (not covered) pressed by O'Brien Landscape it would have dealt with these too. No person or entity including O'Brien Landscape or its insurer Frankenmuth Mutual reached out to Allstate with the claim, a demand to settle, or filed suit against the Allstate insured.

Allstate never had any opportunity to take care of any property claims except the claim by Sentry Insurance. In fact, in review of the claims file, Allstate after this accident reached out to possible bodily injury victim Manuel Rojo, and confirmed no injury. Allstate reached out to O'Brien Landscape and received no communication either.

The SOL for property damage does not expire until May 23, 2027. Allstate has the balance of \$83,443.00 to pay any such claims.

Allstate sought to identify claims and not hearing from anyone never pressed matters further. It paid Sentry since that property damage claim was pressed. No others were. Allstate has no obligation to prompt or remind parties to make claims and file suit. Not every claimant seeks recovery as IDOI is well aware. Allstate had no active letters of representation by any counsel for O'Brien Landscape and Frankenmuth Mutual. O'Brien Landscape was aware that Allstate covered this loss. Allstate routinely will settle and pay unrepudiated claimants. This did not happen here. Neither was Allstate put on any notice of the restitution agreement or request for payment either.



Allstate is not able to respond to why the insured believed Allstate was paying this and he did not have to.

## **H. Attachments.**

For ease of reference, we include the following. Allstate can furnish any nonprivileged documents upon request:

| <b>Exhibit</b> | <b>Description</b>                      |
|----------------|-----------------------------------------|
| A              | Policy                                  |
| B              | Illinois Traffic Crash Report           |
| C              | Proof of Payments of Sentry Subro Claim |
| D              | Federal Court filing of Mr. Allababidi  |
|                |                                         |
|                |                                         |

## **I. Conclusion.**

Allstate is not entirely sure what is being pressed at this time or what needs the IDOI's oversight and attention. IDOI is certainly not going to enter any finding compelling Allstate to pay a criminal case restitution which is not covered. The IDOI is certainly not going to compel Allstate either to seek out unknown property claims and pay them before they are presented and for which Allstate has no information, proof of damage, or documentation of any kind.

Allstate acted properly under Illinois law, the policy terms, and the Illinois Insurance Code, in its adjustment of this loss. Allstate has certain responsibilities of course under the dictates of the insuring agreement to settle, pay, and/or defend any civil claims for property damage once notified for recovery. This restitution claim agreed to by Mr. Allababidi is not a civil claim.

We appreciate the opportunity to clarify our position and are willing to assist the insured in making this right. It would not seem appropriate to front money to Mr. Allababidi to pay this restitution claim. Allstate would help Mr. Allababidi if it could with complete transparency to the States' Attorney's Office and O'Brien Landscaping if presented with an opportunity to pay and make this right.

Thank you for the opportunity to review the insured's concerns.

Best Regards,

Lourdes Krayser

Delivery Senior Manager

# EXHIBIT T

ILLINOIS DEPARTMENT OF INSURANCE TRANSMITTAL — COMPLAINT NO. 01124092

**WHAT THIS EXHIBIT ESTABLISHES**

*Authenticates the channel through which Exhibit X was furnished and fixes its date at July 23, 2026.*

**SOURCE AND AUTHENTICATION**

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | State regulator letter                                                                                                                 |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |



# Illinois Department of Insurance

---

J. B. Pritzker  
Governor

Ann Gillespie  
Director

July 23, 2026

Ehab Allababidi

Case number: Complaint number: 01124092  
Company: Allstate Fire and Casualty Insurance Company

Dear Ehab Allababidi:

Enclosed is a copy of the reply the Department of Insurance has received from the above-named company regarding your complaint.

In review of the company's response, it appears the company was not properly notified of any demand/suit made against you. O'Brien Landscape never made a claim under your policy and pursued restitution through the court system. Please be advised that your policy includes language requiring you to promptly notify your insurer of all demands, summons, or other notice relating to any claim or suit. It also requires you to cooperate with your insurer during any investigation, settlement, or defense of any claim or suit.

Failure to comply with all terms of your policy may be grounds to deny your claim. This generally includes the termination of all legal defense efforts and expenses by your insurer. It appears your insurer has elected to exercise this right.

If you did not receive proper notice before the judgment was entered against you, you may be able to have the judgment vacated for improper service. If the judgment is vacated, you should notify your insurer so they may file an appearance on your behalf. You must contact the company immediately once the judgment is vacated.

The Department of Insurance has reviewed has your complaint and the insurance company's response to determine if any provisions of the Illinois Insurance Code were violated. The information and documentation presented for review does not provide the Department with a basis for taking regulatory action against the company.

The Department regulates the business of insurance in Illinois, while the courts have jurisdiction over individual legal disputes. As a regulatory agency the Department cannot provide legal advice or represent you in any legal action. If you wish to pursue this matter, you have the right to consult legal representation or seek recovery through the court system. If you need assistance finding an attorney to represent you, the Illinois Attorney General, Consumer Protection Division maintains a list of legal aid

**Springfield Office**  
320 W. Washington Street  
Springfield, Illinois 62767  
(217) 782-4515

**Chicago Office**  
115 S. LaSalle Street, 13<sup>th</sup> Floor  
Chicago, Illinois 60603  
(312) 814-2420

providers and contacts for the Illinois State Bar Association on its website  
<http://www.illinoisattorneygeneral.gov/consumers/index.html>

While we understand that this is not the outcome you were seeking, please be assured the Department has reviewed all the information related to your complaint and no violations of the Illinois Insurance Code were identified. Every effort has been made to assist you within the limits of our statutory authority.

The Department appreciates the opportunity to provide this information. If the Department can be of any further assistance, we encourage you to visit our website at <http://insurance.illinois.gov/> or contact the Department toll free at the number listed below.

Sincerely,

Consumer Services Section  
(866) 445-5364  
[DOI.Complaints@illinois.gov](mailto:DOI.Complaints@illinois.gov)

# EXHIBIT U

## APRIL 8, 2026 ADULT PROBATION VIOLATION MEMORANDUM

### WHAT THIS EXHIBIT ESTABLISHES

*The source document for the State's petition, bearing the checked recommendation 'REQUEST THAT PETITION BE FILED.' It dates the amphetamine screen 11/20/25 — ten days from the date later sworn — states that Appellant 'has not provided an updated prescription,' and never mentions the supervising officer's written clearance of the same screen four months earlier. It directs a copy to 'Defense Attorney.'*

### HOW THIS EXHIBIT FITS THE RECORD

The document that generated the petition, and the one that undercuts it. It dates the screen 11/20/25 where the petition swears 11/10/2025; it complains that no *updated* prescription was provided, which presupposes a prescription and is answered by Exhibit W; and it never mentions that the supervising officer had already cleared the same result in writing. Its distribution line directs a copy to a “Defense Attorney,” which Exhibit O says did not exist at the time.

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Probation department record                                                                                                            |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

# ADMINISTRATIVE OFFICE OF THE NINETEENTH JUDICIAL CIRCUIT

FILED

STATE OF ILLINOIS  
CLERK OF THE COURT  
LAKE COUNTY, ILLINOIS



Erin Cartwright  
Clerk of the Court  
Lake County, Illinois

Division of Adult Probation Services

Lake County, Illinois

215 West Water Street  
Waukegan, IL 60085-5616  
Phone: (847) 377-4504  
Fax: (847)984-5790

## MEMORANDUM

TO: STATE'S ATTORNEY, LAKE COUNTY, IL  
ATTENTION: Ben Dillon COURT RM: T-611  
RE: EHAB ALLABABIDI  
ADDRESS: 8516 W Winona St, Chicago, IL 60656  
FROM: MARISA CERVANTES, Probation Officer  
DATE: 04/08/2026  
CASE #: 23CF00001146

THE ABOVE REFERENCED WAS PLACED ON 30 MONTHS Probation by Judge CHRISTOPHER R. STRIDE on 09/08/2025 for AGG RECKLESS DRVG/BODILY HARM IN VIOLATION OF AFORESAID ORDER, TO WIT, PARAGRAPH(S) 2, 4, 12, 19, & 23 AS FOLLOWS:

2. Defendant is assessed \$2,531.00 in court cost and fees. The defendant has an outstanding balance of \$1,131.00.

4. Defendant tested positive for Amphetamines on 11/20/25. Defendant has not provided an updated prescription.

12. Defendant failed to report to probation on the following dates: 02/19/26, 02/27/26, 03/10/26, 03/11/26 & 03/26/26.

19. Defendant failed to complete 240 public service hours.

23. Defendant failed to complete the victim impact panel.

RECOMMENDATION: ☒ REQUEST THAT PETITION BE FILED  
☐ Request hearing to determine status of case with Court  
☐ Take no action  
☐ Other/Comments: \_\_

COPY: Judge  
Defense Attorney  
Probation File

OFFICER: MARISA CERVANTES PHONE: (847)377-3614

Approved By: LORI CARRIER

AOC-3-36-18-R-0399

# EXHIBIT V

## OCTOBER 6, 2025 COURT MINUTES — THE DATE TO WHICH COUNSEL WAS DISCHARGED

### WHAT THIS EXHIBIT ESTABLISHES

*Records 'Defendant Proceeds Pro Se' — the entry on which the June 17, 2026 nunc pro tunc discharge operates, and which establishes that Appellant was unrepresented for Rule 606(a) purposes. Names Mary K. Herbst of Lake County Court Reporters, indicating that a stenographic record of this proceeding exists. Continues the cause to March 7, 2028, the probation termination date fixed by condition 32.*

### HOW THIS EXHIBIT FITS THE RECORD

The date to which Exhibit O reaches back. The entry “Defendant Proceeds Pro Se” is what makes Rule 606(a) operative: an unrepresented defendant who requests an appeal in writing is entitled to have the clerk prepare and file the notice. It also names a court reporter, which matters because the two 2026 proceedings that produced this custody were captured only by electronic recording.

### SOURCE AND AUTHENTICATION

|                       |                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>SOURCE</b>         | Circuit court minutes                                                                                                                  |
| <b>PAGES</b>          | Complete document                                                                                                                      |
| <b>AUTHENTICATION</b> | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |



IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

|                      |   |                                     |
|----------------------|---|-------------------------------------|
| People               | ) |                                     |
|                      | ) |                                     |
| Plaintiff,           | ) | Case No. 23CF00001146               |
| v.                   | ) | Location: Courtroom 611             |
|                      | ) | Event Date: October 6, 2025 9:00 AM |
| PEOPLE VS ALLABABIDI | ) | Event Type: Motion Of Defendant     |
| Defendant.           | ) |                                     |
|                      | ) | Clerk: Amy B                        |

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Guilty  
09/08/2025

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Nolle Prosequi  
09/08/2025

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
Bailey Russell, Public Defender  
Francis P De Rosa IV, States Attorney  
Scott C Pechter, Public Defender  
Nicholas Shepherd, States Attorney  
Mary K. Herbst, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Appellant, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 10/06/2025.  
Defendant Proceeds Pro Se  
Motion of Defendant  
- TO STAY THE RESCISION OF DRIVING  
Motion denied  
Continue to previously set date on 03/07/2028  
Release



# EXHIBIT W

## DECEMBER 8 AND 10, 2025 CORRESPONDENCE OF THE SUPERVISING PROBATION OFFICER

### WHAT THIS EXHIBIT ESTABLISHES

*The written adjudication of the drug screen, five months before the State swore the opposite. December 8, 2025: 'You will NOT have to drug test this time, since your drug test results were all negative.' December 10, 2025: 'I know you are still being prescribed it... Your drug test results were positive for amphetamine, but it is all negative in my eyes because I know you are still taking the Adderall.' The April 8, 2026 memorandum and the May 14, 2026 petition each omit this record.*

### HOW THIS EXHIBIT FITS THE RECORD

The dividing line of this record. Before December 10, 2025 the State could have been mistaken about the screen; after it, the position taken in Exhibit J was contradicted by the State's own supervising officer in writing. The exhibit also carries a photograph of the prescription bottle, filled November 23, 2025 — three days after the screen — which answers the “no updated prescription” complaint in Exhibit U on its own terms.

### SOURCE AND AUTHENTICATION

|                       |                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>SOURCE</b>         | Supervising officer correspondence                                                                                                     |
| <b>PAGES</b>          | Complete document                                                                                                                      |
| <b>AUTHENTICATION</b> | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |



Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

---

**Re: Prescription Verification & Compliance Letter**

1 message

**Adison Weeks (Adult Probation)** <Adison.Weeks@cookcountyil.gov>

Wed, Dec 10, 2025 at 10:32 PM

To: Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

Thanks so much!!

Adison Weeks, Officer  
Cook County Adult Probation Department[2121 Euclid Ave](#)

Rolling Meadows, Illinois 60008

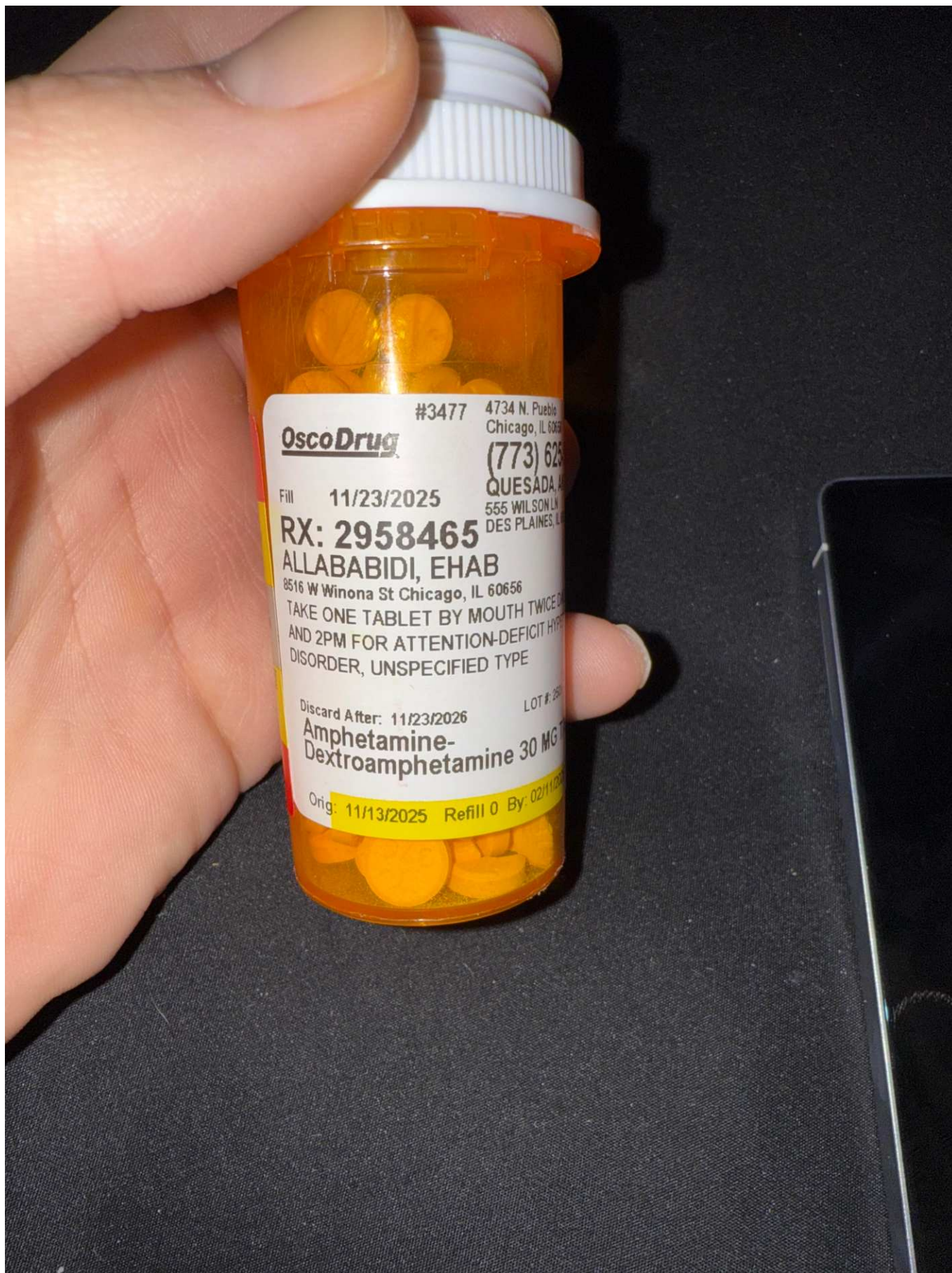
Office: (847)818-2360

[adison.weeks@cookcountyil.gov](mailto:adison.weeks@cookcountyil.gov)*adison b. weeks*

---

**From:** Ehab Hilfiger <defcon5ready@gmail.com>**Sent:** Wednesday, December 10, 2025 1:40 PM**To:** Adison Weeks (Adult Probation) <[Adison.Weeks@cookcountyil.gov](mailto:Adison.Weeks@cookcountyil.gov)>**Subject:** Re: Prescription Verification & Compliance Letter**External Message Disclaimer**

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.



Hi! Here you go ms Adison.

On Wed, Dec 10, 2025 at 12:37 PM Adison Weeks (Adult Probation) <[Adison.Weeks@cookcountyil.gov](mailto:Adison.Weeks@cookcountyil.gov)> wrote:

Hey Ehab,

Do you mind still please sending me a picture of your updated Adderall prescription? I know you are still being prescribed it, but I just want to avoid anyone giving you a hard time for taking it. Your drug test results were positive for amphetamine, but it is all negative in my eyes because I know you are still taking the Adderall. I just want to avoid anyone who sees this result though giving you a hard time for future reference.

Thank you!

Best Regards,

Adison Weeks, Standard Caseload Officer

Cook County Adult Probation Department

2121 Euclid Ave

Rolling Meadows, Illinois 60008

Office: (847)818-2360

[adison.weeks@cookcountyil.gov](mailto:adison.weeks@cookcountyil.gov)

*adison b. weeks*



---

**From:** Ehab Hilfiger <[defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)>

**Sent:** Monday, December 8, 2025 5:04 PM

**To:** Adison Weeks (Adult Probation) <[Adison.Weeks@cookcountyil.gov](mailto:Adison.Weeks@cookcountyil.gov)>

**Subject:** Re: Prescription Verification & Compliance Letter

**External Message Disclaimer**

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Re: Prescription Verification & Compliance Letter

Hi Adison,

Thank you so much for handling everything so quickly, I really appreciate it. I'll be there on Tuesday, December 23rd at 9 AM in person without fail.

I'll also keep you updated on the Lake matter.

Thanks again for all your help and communication.



Best regards,

Ehab Allababidi

On Mon, Dec 8, 2025 at 12:14 PM Adison Weeks (Adult Probation) <[Adison.Weeks@cookcountyil.gov](mailto:Adison.Weeks@cookcountyil.gov)> wrote:

Hi Ehab,

Great! I was literally just about to send you an email just going over what I sent you in the voicemail just now—I know Dr. Quesada also writes and adds the current verified prescriptions you are taking in his updated letters for your case as well—I greatly appreciate you getting back to me so quickly though Ehab, thank you for following up with me! Good luck in court, please keep me updated and in the loop of things on what they say in Lake.

**Just a reminder as well, your next report will be on Tuesday, December 23<sup>rd</sup> @ 9 AM in person.** You will NOT have to drug test this time, since your drug test results were all negative. Once your Cook case terminates on 12/16 as well, we will discuss moving forward and you being assigned a different officer.

In the meantime, I hope you have a good week now, and I appreciate it once again you getting back to me so fast.

Best Regards,

Adison Weeks, Standard Caseload Officer

Cook County Adult Probation Department

2121 Euclid Ave

Rolling Meadows, Illinois 60008

Office: (847)818-2360

[adison.weeks@cookcountyil.gov](mailto:adison.weeks@cookcountyil.gov)

*adison b. weeks*



---

**From:** Ehab Hilfiger <[defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)>

**Sent:** Monday, December 8, 2025 12:02 PM

**To:** Adison Weeks (Adult Probation) <[Adison.Weeks@cookcountyil.gov](mailto:Adison.Weeks@cookcountyil.gov)>

**Subject:** Prescription Verification & Compliance Letter

**External Message Disclaimer**

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Dear Officer Weeks,

I'm sorry I couldn't answer your call - I am currently at the lake county courthouse. I received your voicemail. I'll send you a photo of my updated prescription today, and I've emailed my doctor to send you a standard letter of compliance as soon as possible.

Please let me know if you need anything else.

Sincerely,

Ehab Allababidi

# EXHIBIT X

## NOVEMBER 10, 2025 ADULT NOTIFICATION OF CHANGES TO THE PROBATION FEE SCHEDULE

### WHAT THIS EXHIBIT ESTABLISHES

*The county's own filing, signed by the Director of Court Services. It records that supervision was 'transferred from Lake County and accepted by Cook County as of 10/1/2025,' and that 'the defendant is in arrears \$100.00 to Lake County.' It establishes both that the arrears were \$100.00 and that Lake County no longer held supervision on the 2026 dates the petition charges as failures to report.*

### HOW THIS EXHIBIT FITS THE RECORD

Two allegations fail on this one form. It fixes the arrears at \$100.00, against a petition that calls the nonpayment willful without naming an amount; and it records that supervision moved to Cook County effective October 1, 2025, against a petition charging failure to report to *Lake County* probation on five dates in 2026. It also explains why the officer in Exhibit W was a Cook County officer.

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | AOIC form, filed                                                                                                                       |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |

Client PIN: 227568

In the Circuit Court of the 19<sup>th</sup> Judicial Circuit  
Lake County, Illinois

FILED  
NOV 10 2025  
CLERK OF COURT  
JANICE L. HARRIS

In Re: Probation Supervision of EHAB ALLABABIDI  
{Defendant's Name}

Case No.

Address: 8516 W Winona St., Chicago, IL 60656

Date of Birth: 09/24/1996

### Adult Notification of Changes to the Probation Fee Schedule

Sentencing Information: Original Jurisdiction: Lake County

Original Case Number: 23CF00001146

Original Sentencing Date: 09/08/2025

Length of Original Probation Sentence: 30 MONTHS

Probation Fees Ordered at Sentencing: \$ 50 /month for 30 months

**You are hereby notified of the following change(s) in the aforementioned defendant's probation fee schedule pursuant to 730 ILCS 5/5-6-3 and 730 ILCS 5/5-6-3.1:**

1. The defendant's probation supervision has been transferred from Lake County and accepted by Cook County as of 10/1/2025. The defendant has been assessed a probation fee of \$ 50 /month for 2 months and has paid a total of \$ 0 prior to acceptance of transfer. The defendant is in arrears \$ 100.00 to Lake County. —
2. The defendant's probation supervision has been transferred from \_\_\_\_\_ County, and accepted by \_\_\_\_\_ County as of / /. The defendant has been assessed a probation fee of \$ / /month and elected to pay probation fees due in a "lump sum" of \$ \_\_\_\_\_ leaving a balance of \$ \_\_\_\_\_ prior to acceptance of transfer.
3. Future probation fee payments will be paid to the Clerk of the Circuit Court in the receiving county of — in the amount of \$ — /month for — months. —
4. The probation department has re-evaluated the defendant's ability to pay, and the defendant's probation fee has been adjusted from \$ \_\_\_\_\_ per month to \$ \_\_\_\_\_ per month as of / /, and notice of such adjustment has been given to the defendant. The adjusted total probation fees due is \$ \_\_\_\_\_.

Signed: \_\_\_\_\_ Date: / /  
{Defendant's Signature}

5. Other (please explain) \_\_\_\_\_

Printed: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: 10/1/2025  
{Director of Court Services/Chief Probation Officer/Designee}

c: — Court File — Probation Case File — Defendant

AOIC Form (Rev)-12/21



FILED

NOV 10 2025

24

11

# EXHIBIT Y

JUNE 8, 2026 WRITTEN REFUSAL BY THE OFFICE OF THE CIRCUIT CLERK

## WHAT THIS EXHIBIT ESTABLISHES

*The Clerk's office, in writing: the case could not be added to the call because 'the motion must be filed by your attorney. I would reach out to your public defender to have this matter added to the call.' Appellant had no public defender; the same office was discharged nunc pro tunc nine days later. It corroborates that he was self-represented and shows why no motion of his was ever calendared.*

## HOW THIS EXHIBIT FITS THE RECORD

Why no motion of Appellant's was ever calendared. The Clerk's office directed him to file through an attorney nine days before the same court discharged that attorney retroactively (Exhibit O). Together they describe a closed channel, which is the condition 28 U.S.C. § 2254(b)(1)(B)(ii) addresses and the reason the record-production motion asks this Court to order rather than request.

## SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Clerk's office correspondence                                                                                                          |
| PAGES          | Complete document                                                                                                                      |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |



Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

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**Motion**

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**CC No Reply** <CCNoReply@lakecountyil.gov>

Mon, Jun 8, 2026 at 6:48 PM

To: "defcon5ready@gmail.com" &lt;defcon5ready@gmail.com&gt;

Good Afternoon Mr. Allababidi

We have received your email about adding this case to the call for 06/09/2026, Unfortunately we cannot add this case to the call because we do not have the original motion copy and the motion must be filed by your attorney. I would reach out to your public defender to have this matter added to the call.

Thank you.

Hanna Becerra  
Criminal/Traffic Court Services Representative  
Clerk of The Circuit Court Erin Cartwright-Weinstein  
[18 N. County St](#)  
Waukegan IL 60085  
(847)377-3282

# EXHIBIT Z

## USPS OFFICE OF INSPECTOR GENERAL REFERRAL — ROUTING MEMORANDUM

### WHAT THIS EXHIBIT ESTABLISHES

*The referral lodged with the USPS Office of Inspector General and the Postal Inspection Service concerning the two certified articles addressed to the Clerk of the Circuit Court. It is included because the second article carried the paper copy of the omnibus filing this record shows was never calendared, and because the intake metadata for July 23 is held by the same office whose docket classification is at issue.*

### VISIBLE ON THE FACE OF THE DOCUMENT

- July article **9402611898765521606811**: accepted July 11, 2026 at 9:30 a.m.; picked up in Waukegan July 23 at 6:12 a.m.; the court's notice was file-stamped at 11:59 a.m. the same morning — five hours and forty-seven minutes later.
- June article **9402611898765528934061**: last carrier event Palatine, June 9, 2026, 7:55 a.m., "in transit to the destination." It has never been delivered.

### EXCERPT MAP — ORIGINAL PAGES REPRODUCED

| Orig. p. | What that page shows                                                           |
|----------|--------------------------------------------------------------------------------|
| 1        | Routing memorandum with the controlled chronology for both certified articles. |

### SOURCE AND AUTHENTICATION

|                |                                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE         | Referral memorandum, July 28, 2026                                                                                                     |
| PAGES          | Selected pages 1 of the original                                                                                                       |
| AUTHENTICATION | Certified by Appellant under 735 ILCS 5/1-109 and Illinois Supreme Court Rule 328 as a true and correct copy of the identified record. |



EHAB ALLABABIDI

## LEGAL CORRESPONDENCE

AGENCY-SPECIFIC ACTION ROUTING MEMORANDUM

8516 W. Winona St., Chicago, IL 60656  
(773) 920-0030 | defcon5ready@gmail.com

July 28, 2026

### POSTAL-EMPLOYEE / CONTRACTOR MISCONDUCT INTAKE

## ACTIONABLE ROUTING MEMORANDUM

### USPS OFFICE OF INSPECTOR GENERAL

ATTN: OIG HOTLINE

1735 North Lynn Street · Arlington, Virginia 22209-2020

#### CONTROLLED THRESHOLD CHRONOLOGY

July article 9402611898765521606811: accepted July 11 at 9:30 a.m.; picked up in Waukegan July 23 at 6:12 a.m.; court notice file-stamped at 11:59 a.m. the same day. June article 9402611898765528934061: last supplied event Palatine June 9; still in transit in the account record updated July 27. **(Master Exs. A, D, E.)**

#### WHY THIS OFFICE IS RECEIVING THE RECORD

The OIG publicly accepts allegations of mail destruction, theft, fraud, abuse, or misconduct by Postal Service employees and contractors. The attached record does not ask OIG to treat ordinary delay as misconduct; it asks OIG to determine whether any postal employee, contractor, device, or official record was knowingly used to divert, suppress, misstate, or conceal the two Lake County custody chains.

#### OFFICE-SPECIFIC ACTION REQUESTED

- 1 Log and evaluate this as a named Hotline allegation and provide the complaint or reference number.
- 2 Preserve or cause preservation of PTR events, manual corrections, scanner/device identifiers, C360 notes, exception records, employee or contractor assignments, and communications tied to both articles.
- 3 Determine whether the Indiana route, Palatine freeze, missing delivery confirmation, or any corrected/suppressed event reflects employee or contractor misconduct rather than an ordinary service failure.
- 4 Segregate service-delay issues for Consumer Affairs and refer any non-postal criminal predicate to USPIS without closing the employee-misconduct component by circular referral.

#### DISPOSITION REQUEST

Provide the Hotline/reference number, responsible component, and whether the matter was retained, referred, or closed. If referred, identify the receiving office and preserve the original submission and attachments.

#### SCOPE LIMITATION

No particular postal employee is identified as guilty. Intent and actor classification remain questions for native records and investigation.

*Authority / routing source:* Official route: [uspsaig.gov/contact-us](https://uspsaig.gov/contact-us) and [uspsaig.gov/about-us/frequently-asked-questions](https://uspsaig.gov/about-us/frequently-asked-questions)

Respectfully and without waiver,

/s/ Ehab Allababidi · Pro Se · (773) 920-0030 · defcon5ready@gmail.com

**IN THE APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT**

**PEOPLE OF THE STATE OF ILLINOIS,**  
*Plaintiff-Appellee,*

v.

**EHAB ALLABABIDI,**  
*Defendant-Appellant, Pro Se.*

APPELLATE COURT OF ILLINOIS  
SECOND DISTRICT

Appeal No. **2-26-0352**

Appeal from the Circuit Court of  
Lake County, No. **23 CF 1146**

The Honorable Christopher R. Stride,  
Judge Presiding

**NOTICE OF FILING AND PROOF OF SERVICE**

*735 ILCS 5/1-109 · Illinois Supreme Court Rules 11 and 12*

PLEASE TAKE NOTICE that on **July 28, 2026** the undersigned filed with the Clerk of the Appellate Court of Illinois, Second District, through the eFileIL electronic filing system, the documents listed in Part A below, and served upon the persons identified in Part C, by the electronic methods identified there, the documents listed in Part B.

**A. Filed with the Court**

1. Rule 606(g) Criminal Docketing Statement
2. **Application for Waiver of Appellate Court Fees, and proposed order**
3. Omnibus Emergency Motion — jurisdiction under Rules 606(a) and 606(c); stay under Rule 609(a); counsel and report of proceedings under Rule 607; and record production and correction under Rules 329, 361, 366, and 608
4. Memorandum of Law in Support of Omnibus Emergency Motion
5. Proposed Order on Omnibus Emergency Motion
6. Notice of Related and Prior Appellate Proceedings
7. Supporting Record under Illinois Supreme Court Rule 328, Exhibits A through Z, certified under 735 ILCS 5/1-109 and carrying its own index
8. This Notice of Filing and Proof of Service

**B. Served on the People**

The service copy comprises every document listed in Part A **except** the Application for Waiver of Appellate Court Fees and its proposed order, and this Notice of Filing and Proof of Service. The fee-waiver application is Appellant's financial disclosure to the Court, in which the People has no role; this Notice is the certificate of the service it records. Both are filed with the Court and available to the People on the docket.

1. Rule 606(g) Criminal Docketing Statement

2. Omnibus Emergency Motion
3. Memorandum of Law in Support of Omnibus Emergency Motion
4. Proposed Order on Omnibus Emergency Motion
5. Notice of Related and Prior Appellate Proceedings
6. Supporting Record under Illinois Supreme Court Rule 328, Exhibits A through Z

### C. Manner of service

|                                  |                                                                                                       |
|----------------------------------|-------------------------------------------------------------------------------------------------------|
| Appellate Court, Second District | Filed via eFileIL. 55 Symphony Way, Elgin, Illinois 60120.                                            |
| Lake County State's Attorney     | Email to statesattorney@lakecountyil.gov. 18 N. County Street, Third Floor, Waukegan, Illinois 60085. |

Service is by electronic transmission only. Appellant is self-represented, receives SNAP benefits, and has filed an application for waiver of appellate court fees. No postal service is undertaken or represented as to any recipient identified above. The Office of the State's Attorneys Appellate Prosecutor has not appeared and no electronic service address for it was located; it will be served through the electronic filing system upon its appearance.

### Certification

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that the statements set forth in this Notice of Filing and Proof of Service are true and correct, and that he filed and served the documents listed above upon the persons named, by the methods stated, on July 28, 2026.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI**

Defendant-Appellant, Pro Se

8516 W. Winona St., Chicago, Illinois 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: July 28, 2026