

NOTICE AND DEMAND TO THE OFFICE HOLDING THE WARRANT · BUILT ON THAT
OFFICE'S OWN PRODUCTIONWRITTEN RESPONSE REQUESTED BY AUGUST 5,
2026

Warrant 314270 — Correction of Record and Request FOIA 8745

Sheriff John D. Idleburg · sheriff@lakecountyil.gov

Sgt. Katie Gordon, Civil Process & Warrants Divisions · 847-377-4361 · warrants@lakecountyil.gov

Raul Casas, Records Supervisor · 847-377-4956 · login sd.rcasas

Lake County Sheriff's Office · 25 S. Martin Luther King Jr. Ave., Waukegan, Illinois 60085 · fax (847) 984-5974

cc MNelson@lakecountyil.gov · DBrown2@lakecountyil.gov · EOsinski@lakecountyil.gov · PSutton@lakecountyil.gov
NShepherd@lakecountyil.gov · BDillon@lakecountyil.gov · FDeRosa@lakecountyil.gov · statesattorney@lakecountyil.gov

WARRANT

Warrant of arrest issued May 28, 2026 — People v. Allababidi, Lake County No. 23 CF 1146

Warrant 314270 · State Warrant Number W26F4152 · your database carried it Active, Category Felony, on the 2022 traffic charges when printed July 15, 2026 at 14:17 · section 114-5(d) motion file-stamped July 23, 2026 and unreferred

Sheriff Idleburg, Sergeant Gordon, and Mr. Casas:

Your Office holds an arrest warrant issued May 28, 2026 in Lake County No. 23 CF 1146. This letter concerns two things your Office's own records now establish, both of which appear in the production the County released on July 29, 2026.

I. THE WARRANT RECORD AND ITS TIMESTAMPS

PRODUCTION PAGE 225

[“Warrant WT filed for 23CF00001146 PEOPLE VS ALLABABIDI” — automated notification from the electronic court system to **SDWARRANT CLERKS**, sent **Thursday, May 28, 2026 at 10:56 a.m.**, forwarded on July 15, 2026 at 1:36 p.m. by Sergeant Katie Gordon of the Civil Process and Warrants Divisions to Records Supervisor Raul Casas.]

That is the machine record of the warrant's entry into the Warrants Division queue. It is material because of what the same production shows happened earlier that morning. At 7:00 a.m. on May 28, 2026 the undersigned transmitted an emergency appearance for Courtroom T-611. At 7:19 a.m. the prosecuting Assistant State's Attorney forwarded the undersigned's case-initiating document to the Clerk of the United States Court of Appeals for the Seventh Circuit. (Production pp. 737, 553.) The warrant entered your queue at 10:56 a.m., three hours and thirty-seven minutes after the State had the filing in hand.

II. THE INSTRUMENT UNDERLYING THE WARRANT

The warrant recites a “**technical violation**” and commands that the undersigned “be held in custody for First Appearance Court.” Section 5-6-4(b) of the Unified Code of Corrections provides for release, not custody, on a technical violation. 730 ILCS 5/5-6-4(b).

The petition beneath it was sworn May 14, 2026 by an Assistant State's Attorney who is a defendant in his individual capacity in *Allababidi v. Shepherd*, No. 1:26-cv-06738 (N.D. Ill.), for the act of swearing it. Its second ground is amphetamine use. The supervising probation officer had cleared that screen in writing five months earlier. And the



internal request that produced the petition, dated April 8, 2026, was addressed to Assistant State’s Attorney Benjamin Dillon (production p. 184) — the same assistant to whom the investigating detective had written on August 11, 2022:

PRODUCTION PAGE 198 — DET. PAUL PETRICK TO ASA BENJAMIN DILLON

[“This lab report does not offer an specific amount; just Amphetamine and Benzodiazepines. **I believe it would be hard pressed to prove DUI drugs.** Our lab report also did not specify amounts.”]

III. SECTION 114-5(D) AND THE AUTHORITY OF THE ISSUING JUDGE

A verified motion for substitution of judge for cause under 725 ILCS 5/114-5(d) was file-stamped in that cause on **July 23, 2026**. The statute provides that upon its filing “a hearing shall be conducted as soon as possible after its filing **by a judge not named in the motion.**” No judge has been assigned to hear it and no order of referral appears on the docket. Where such a motion is improperly denied, “all subsequent action of the trial judge is void.” *People v. Ryan*, 264 Ill. App. 3d 1, 3 (1994).

Your Office has documented notice of that motion. At 8:44 a.m. on June 18, 2026 the prosecuting assistant forwarded a notice reading “NEW FAX: A fax of 39 pages has been received on your fax” to county civil counsel. (Production p. 465.) That was the fax carrying the motion.

An emergency motion is pending in the Appellate Court, Second District, No. 2-26-0352, asking that Court to stay the order of June 17, 2026 and to recall this warrant. Illinois Supreme Court Rule 609(a) permits a sentence to be stayed and a defendant admitted to bail “by a judge of the trial **or** reviewing court.”

IV. THE WARRANT DETAILS RECORD OF JULY 15, 2026

The production contains your Office’s own **Warrant Details** record for this warrant, printed **07/15/2026 at 14:17** under **Login Id: sd.rcasas**. (Production pp. 228–229.) It is reproduced as Exhibit B. Its fields read as follows.

Field	Value in your record on July 15, 2026
Warrant number	314270 · State Warrant Number W26F4152
Status / Action	Active / Active · Status Date/Time 05/28/2026
Category / Type	Felony / Violation
Warrant Issuing Agency	IL0492900: Lincolnshire Police Department
Warrant Issuing Judge	Christopher R. Stride · Court Case Number 23CF00001146
Bond Amount	blank on both charge lines
Charge 1	SPEEDING 35+ MPH OVER LIMIT · 625 ILCS 5/11-601.5-B · Occurred 5/23/2022 · Statute Crime Code NR — Non-Reportable Crime Code · Sub-Type Traffic
Charge 2	AGG RECKLESS DRVG/BODILY HARM · 625 ILCS 5/11-503-A-1 · Occurred 5/23/2022 · same coding
Extradite / Night Service	No / No · Apprehension Area: Illinois/Wisconsin Only

The warrant that issued on May 28, 2026 issued on a petition to revoke probation. Your record carries **no probation-violation charge at all**. What it carries are the two 2022 traffic offenses, with an occurrence date of May 23, 2022 — the offenses disposed of by the plea entered September 8, 2025. It categorises the warrant as a **felony**, although Condition 30 of the sentencing order provides that absent a violation the plea to Count 1 “shall be amended to a Reckless



Driving (Class A) misdemeanor,” and no violation has been adjudicated: there has been no hearing under 730 ILCS 5/5-6-4(b) and no finding.

It names the **Lincolnshire Police Department** as the issuing agency for a warrant your record elsewhere states was issued by a circuit judge on a State’s Attorney’s petition. It carries no bond amount. And it codes a bodily-harm felony as a non-reportable traffic code.

The print bears its own timestamp, and it sits inside a sequence of fifty-two minutes on a single afternoon: at **1:36 p.m.** Sergeant Gordon forwards the May 28 warrant notification to Mr. Casas; at **2:17 p.m.** Mr. Casas prints this record; at **2:28 p.m.** Mr. Casas sends “FOIA 8745 Draft Response” to the Chief Deputy of the Civil Trial Division. The record was **Active** at 2:17 p.m. on July 15, 2026, after every notice identified in this letter had been served on your Office and on the State.

THE RECORD HAS NOT BEEN CORRECTED

[Whatever position your Office takes on the warrant, the record above is not a record of the instrument it purports to describe. A warrant issued on a 2026 petition to revoke probation is carried in your system as an active felony on 2022 traffic charges, with no bond, and with a municipal police department named as the issuing agency. That is a data-integrity problem your Office can fix without any court’s permission, and paragraphs 6 through 9 below ask that it be fixed now.]

V. THE RESPONSE OF THE NAMED ISSUING AGENCY

The Warrant Details record quoted above names **IL0492900: Lincolnshire Police Department** as the Warrant Issuing Agency. On **July 20, 2026** the Village Manager of Lincolnshire wrote, on Village letterhead, copying the Mayor, the Board of Trustees, and Police Chief Leonas:

BRADLY J. BUI, VILLAGE MANAGER, VILLAGE OF LINCOLNSHIRE — JULY 20, 2026

*[“The Village of Lincolnshire **acknowledges receipt of a litigation hold in force since June 6, 2026 and confirms all records related to this matter will be retained** by the corporate authorities of the Village of Lincolnshire as required by law. ... The Village of Lincolnshire is **prepared to comply with any direction or request from the PAC to comply with your requested review.**”]*

That letter is Exhibit C. Lincolnshire answered within three days of the communications it responded to. It acknowledged a hold running from June 6, 2026. It confirmed retention. It volunteered compliance with whatever the Public Access Counselor directs. And it copied its elected board and its police chief.

Your Office has done none of those things. It has acknowledged no hold. It has confirmed no retention. It has stated no position on review by the Public Access Counselor. And as of the 2:17 p.m. print on July 15, 2026, its record of this warrant remained Active, categorised as a felony, on charges from 2022.

ONE OF THE TWO AGENCIES HAS ANSWERED IN WRITING

[The Village of Lincolnshire is a municipality of roughly seven thousand people with a single police department, and it managed a written litigation hold, a retention confirmation, and an offer of PAC compliance in one page over the signature of its Village Manager. The undersigned asks nothing more of the Lake County Sheriff’s Office than the same three sentences.]

VI. REVIEW OF THE DRAFT RESPONSE BY COUNSEL OF RECORD



PRODUCTION PAGE 217

[“FOIA Guidance” — Raul Casas, Records Supervisor, Lake County Sheriff’s Office, to *Melanie Nelson, Chief Deputy, Civil Trial Division, State’s Attorney’s Office, Wednesday, July 15, 2026 at 2:28 p.m.* Attachments, as listed on the face of the page: “Ehab FOIA.pdf,” “FOIA 8745 Draft Response.pdf,” “Warrant Details.pdf,” “Fw Warrant WT filed for 23CF00001146.pdf.”]

Melanie Nelson is Chief Deputy of the Civil Trial Division of the State’s Attorney’s Office. That office represents Lake County and its officers in the civil and federal actions in which the undersigned is the plaintiff or petitioner. Section 9(a) of the Freedom of Information Act requires that a denial be in writing by the public body’s Freedom of Information officer, specifying the exemption claimed and the reasons for it. 5 ILCS 140/9(a). The production records the response being drafted and then sent to counsel adverse to the requester.

VII. DEMANDS

- 1 Preserve.** Suspend any ordinary-course deletion, purge, overwrite, rotation, or retention schedule affecting: all electronic mail, attachments, and calendar entries of the Warrants Division, the Records Division, and the Office of the Sheriff concerning the undersigned or No. 23 CF 1146; the LEADS and warrant-management entries for that warrant, including every status change and the account making it; and the complete file for request FOIA 8745, including drafts, review comments, and transmittal records.
- 2 Identify who approved the response to FOIA 8745,** and state whether any attorney representing Lake County or any County officer in litigation involving the undersigned reviewed, revised, or approved it before release.
- 3 State the warrant’s current status** in your systems, including whether it is active in LEADS, and identify every entry, modification, and transmittal since May 28, 2026.
- 4 Produce the warrant transmittal** — the instrument by which the warrant reached your Office, with its date and time of receipt.
- 5 Confirm in writing whether your Office intends to execute this warrant before the Appellate Court rules** on the pending emergency motion in No. 2-26-0352.
- 6 Correct the Warrant Details record, or state in writing why each field is accurate.** Specifically: the two 2022 traffic charge lines; the Felony category; the identification of the Lincolnshire Police Department as issuing agency; the blank bond amount; and the “NR — Non-Reportable Crime Code” coding applied to a bodily-harm offence.
- 7 Produce the Event Log and Service Attempts entries** for warrant 314270 and State Warrant Number W26F4152, identifying every user account that created, modified, printed, or transmitted the record, with dates and times, from May 28, 2026 to the present.
- 8 State what is in LEADS and NCIC** for this warrant as distinct from the local record, and whether the fields identified in paragraph 6 are replicated there.
- 9 State whether the record was reviewed for accuracy at any time** between May 28, 2026 and July 15, 2026, and by whom.
- 10 Answer as Lincolnshire answered.** Acknowledge the litigation hold in writing; confirm that records related to this matter will be retained; and state whether your Office will comply with any direction of the Public Access Counselor on request FOIA 8745. Exhibit C is a one-page model.

The undersigned does not ask your Office to disregard a court order, and nothing in this letter should be read as such a request. The purpose of paragraph 5 is that your answer, whatever it is, be in writing and dated. Your Office is now on notice of the section 114-5(d) defect, of the pending application in the reviewing court, and of the contents of your own production.



EHAB ALLABABIDI

Sheriff — Warrant Status and FOIA 8745

People v. Allababidi — Lake County No. 23 CF 1146

Appeal No. 2-26-0352 (Ill. App. 2d) · Allababidi v. Junkin, No. 1:26-cv-01077 (N.D. Ill.)

WRITTEN RESPONSE REQUESTED BY AUGUST 5, 2026

The call below is set for August 6, 2026 at 9:00 a.m.. A response after that date cannot inform anything. Reply by electronic mail to the address on this letterhead. No response by postal mail is requested or will be treated as timely.

Respectfully and without waiver of any right or remedy,

/s/ Ehab Allababidi

EHAB ALLABABIDI | *Pro Se*

8516 W. Winona St., Chicago, IL 60656

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



EHAB ALLABABIDI

LEGAL CORRESPONDENCE

730 ILCS 5/5-6-4(b) · 725 ILCS 5/114-5(d) · 5 ILCS 140/9 · Ill. S. Ct. R. 609(a)

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

July 29, 2026

ENCLOSURE REGISTER

EXHIBIT INDEX

The following authenticated records are transmitted with and incorporated into this letter.

EX.	RECORD	BATES / SOURCE
A	Warrant queue notification and internal forward The electronic court system notification of May 28, 2026, 10:56 a.m., forwarded July 15, 2026.	PROD-000225
B	Warrant Details — your own database record, printed July 15, 2026 at 14:17 Login Id sd.rcasas. Status: Active. Category: Felony. Charges: the two 2022 traffic offences.	PROD-000228 – PROD-000229
C	Village of Lincolnshire — acknowledgment of litigation hold and PAC compliance July 20, 2026, over the signature of Village Manager Bradly J. Bui, copying the Mayor, the Board of Trustees, and Police Chief Leonas.	LINC-000001
D	“FOIA Guidance” — draft response routed to the Civil Trial Division Records Supervisor to Chief Deputy, Civil Trial Division, July 15, 2026, 2:28 p.m.	PROD-000217
E	Det. Petrick to ASA Dillon, August 11, 2022 “I believe it would be hard pressed to prove DUI drugs.”	PROD-000198
F	Probation’s violation request to ASA Dillon and ASA Shepherd April 8, 2026. Ground two is “amphetamine use.”	PROD-000184



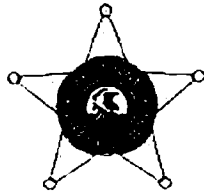
A

Warrant queue notification and internal forward

PROD-000225

The electronic court system notification of May 28, 2026, 10:56 a.m., forwarded July 15, 2026.

From: Katie Gordon
To: Raul Casas
Subject: Fw: Warrant WT filed for 23CF00001146
Date: Wednesday, July 15, 2026 1:36:17 PM
Attachments: s3Temp124578152552273305273ab0d7b-6fe1-4238-80ce-3d7be60db0574.pdf
Outlook-glvc3cey.png



Sheriff's Office

Katie Gordon | Sergeant
Lake County Sheriff's Office
Civil Process & Warrants Divisions
25 S. Martin Luther King Jr. Ave.
Waukegan, IL 60085
Direct: 847-377-4361
www.lakecountyil.gov/sheriff

From: noreply+lakecountycourt@ecourt.com <noreply+lakecountycourt@ecourt.com>
Sent: Thursday, May 28, 2026 10:56 AM
To: SDWARRANT CLERKS <sdwarrantclerks@lakecountyil.gov>
Subject: Warrant WT filed for 23CF00001146

Warrant WT filed for 23CF00001146 PEOPLE VS ALLABABIDI

Document Attached.

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B

**Warrant Details — your own database record, printed July
15, 2026 at 14:17**

PROD-000228 – PROD-000229

Login Id sd.rcasas. Status: Active. Category: Felony. Charges: the two 2022 traffic offences.



Warrant Details



Agency: Lake County Sheriff's Office
Agency #: IL0490000

Print Date/Time: 07/15/2026 14:17

Warrant Status: All
Warrant Category: All
Warrant Type: All

From Date: All
To Date: All

Warrant Information

General

Number: 314270
Category: Felony
Location:
Date/Time: 05/28/2026
Emancipation Date:
Served By:
Status Date/Time: 05/28/2026
Offender Subject Adult
Type:
Offender Local ID Number:
Offender License Expiration Date:
Offender Race:
Offender Eye Color: Brown

Original Name:
Type: Violation
Action: Active
Expiration Date:
Extradite: No
Status: Active
Status Reason:
Offender Name Formatted: ALLABABIDI, EHAB
Offender License Number:
Offender Height:
Offender Sex: Male
Offender Hair Color: Brown



Night Service: No
Status Entered By: nwsinterfaces
Status Comments:
Offender Date Of Birth: 09/24/1996
Offender License State: IL
Offender Weight: 200 lbs to 200 lbs
Offender Ethnic Origin:

Dispositions

Supplemental Information

Warrant Issuing Agency: IL0492900: Lincolnshire Police Department
Other Agency:
Court Case Number: 23CF00001146
Apprehension Area: Illinois/Wisconsin Only

Warrant Issuing Judge: Christopher R. Stride
Other Agency Case Number:
State Warrant Number: W26F4152
NCIC Miscellaneous Text:

Filed By
Personnel:
Court Case Agency:
Federal Warrant Number:



Warrant Details



Agency: Lake County Sheriff's Office
Agency #: IL0490000

Print Date/Time: 07/15/2026 14:17

Warrant Status: All
Warrant Category: All
Warrant Type: All

From Date: All
To Date: All

Charges

Occurred Date/Time: 5/23/2022
Bond Amount:
Counts: 1
Statute Crime Code: NR - Non-Reportable Crime Code
Statute Sub-Type: Traffic
Statute Unconstitutional Date:

Docket Number:
Disposition:
Statute Group: State
Statute Description: SPEEDING 35+ MPH OVER LIMIT
Statute Effective Date: 12/31/2021
Clery Code:

Bond Type:
Attempt/Commit:
Statute/Violation: 625 ILCS 5.0/11-601.5-8
Statute Type: State
Statute Repealed Date:

Occurred Date/Time: 5/23/2022
Bond Amount:
Counts: 1
Statute Crime Code: NR - Non-Reportable Crime Code
Statute Sub-Type: Traffic
Statute Unconstitutional Date:

Docket Number:
Disposition:
Statute Group: State
Statute Description: AGG RECKLESS DRVG/BODILY HARM
Statute Effective Date: 12/31/2004
Clery Code:

Bond Type:
Attempt/Commit:
Statute/Violation: 625 ILCS 5.0/11-503-A-1
Statute Type: State
Statute Repealed Date:

Event Log

Service Attempts

Vehicles



C

**Village of Lincolnshire — acknowledgment of litigation hold
and PAC compliance**

LINC-000001

*July 20, 2026, over the signature of Village Manager Bradley J. Bui, copying the Mayor, the Board of
Trustees, and Police Chief Leonas.*



VILLAGE OF
LINCOLNSHIRE

July 20, 2026

Mr. Ehab Allababidi, Pro Se
8516 W. Winona Street
Chicago, IL 60656

SUBJECT: Acknowledgement of Litigation Hold and FOIA Status Update

Dear Mr. Allababidi,

The Village of Lincolnshire is in receipt of your various electronic communications dated July 17, 2026. The Village of Lincolnshire acknowledges receipt of a litigation hold in force since June 6, 2026 and confirms all records related to this matter will be retained by the corporate authorities of the Village of Lincolnshire as required by law.

In response to your communication regarding records requests under the Freedom of Information Act submitted to the Village of Lincolnshire, the Village is aware you have filed a request for review to the Public Access Counselor (PAC) in the Office of the Illinois Attorney General. The Village of Lincolnshire is prepared to comply with any direction or request from the PAC to comply with your requested review.

Sincerely,

Bradly J. Burke
Village Manager

cc: Lincolnshire Mayor and Board of Trustees
Police Chief Leonas



D

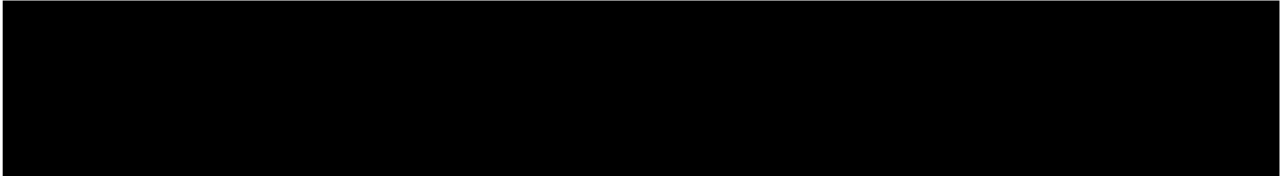
**"FOIA Guidance" — draft response routed to the Civil Trial
Division**

PROD-000217

Records Supervisor to Chief Deputy, Civil Trial Division, July 15, 2026, 2:28 p.m.

From: Raul Casas
To: Melanie Nelson
Subject: FOIA Guidance
Date: Wednesday, July 15, 2026 2:28:29 PM
Attachments: [Ehab FOIA.pdf](#)
[FOIA 8746 Draft Response.pdf](#)
[Warrant Details.pdf](#)
[Fw: Warrant WT filed for 23CF00001146.pdf](#)
[EHABALLABABID23CF00001146VIOL.pdf](#)
[image002.png](#)

Hi Melanie,



Thank you,



Raul Casas | Records Supervisor
Lake County Sheriff's Office
25 S. Martin Luther King Jr. Ave.
Waukegan, IL 60085
Direct: 847.377.4956
www.lakecountyil.gov/sheriff

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E

Det. Petrick to ASA Dillon, August 11, 2022

PROD-000198

"I believe it would be hard pressed to prove DUI drugs."

Dillon, Benjamin

From: Paul Petrick <ppetrick@lincolnshireil.gov>
Sent: Thursday, August 11, 2022 9:41 AM
To: Dillon, Benjamin
Cc: Matthew Ulanowski; Dillon Forkes
Subject: [EXTERNAL] report LPD 22-7193
Attachments: Medical Records Ehab.pdf

CAUTION: Do not click links, open attachments, or reply to unknown or unexpected senders.

Mr. Dillon,

I will be sending you several emails containing the documentation of LPD case 2022-7193. A traffic crash on IL RT 22 at Old Mill RD. There was an MCAT number assigned due to the extraction of evidence from the vehicles involved. Page 10 of this medical record has the controlled substances listed at time he was taken into the E/R. This lab report does not offer an specific amount; just Amphetamine and Benzodiazepines. I believe it would be hard pressed to prove DUI drugs [REDACTED] Our lab report also did not specify amounts.

There will be several other emails with reports to complete all documents for your review in this case. Feel free to contact me with questions.

Thank you.

Detective Paul J. Petrick
 Village of Lincolnshire
 Police Department

O: 847-913-2349
ppetrick@lincolnshireil.gov



VILLAGE OF
 LINCOLNSHIRE

CONFIDENTIAL COMMUNICATION

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F

**Probation's violation request to ASA Dillon and ASA
Shepherd**

PROD-000184

April 8, 2026. Ground two is "amphetamine use."

From: Lori R. Carrier
To: Benjamin Dillon; Nicholas Shepherd
Cc: Marisa Cervantes; PDRemoteCourt
Subject: Ehab Allababidi 23CF1146 PTR Request T611
Date: Wednesday, April 8, 2026 10:57:56 AM
Attachments: E. Allababidi Violation.docx

Good morning,

PTR Request for failure to report, amphetamine use, failure to complete public service and failure to attend the victim impact panel.

Termination scheduled for 3/7/28 in T611.

Thank you,

Lori Carrier
Unit Manager
Lake County Adult Probation
19th Judicial Circuit Court
847-377-3890
Fax 847-984-5874
lcarrier@lakecountyil.gov

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