



TO THE OFFICE THAT RECEIVED THE DRAFT RESPONSE · AND TO RISK MANAGEMENT

WRITTEN RESPONSE REQUESTED BY AUGUST 5,
2026

Request FOIA 8745 — Review by Counsel of Record, and Litigation Hold

Melanie Nelson, Chief Deputy, Civil Trial Division · MNelson@lakecountyil.gov**Dan E. Brown**, Assistant State's Attorney · DBrown2@lakecountyil.gov**Patrice Sutton** · PSutton@lakecountyil.gov

Office of the State's Attorney of Lake County · 18 N. County Street, Waukegan, Illinois 60085 · fax (847) 360-0993

Erika Osinski, Risk Manager for Lake County · 847-377-2751 · EOosinski@lakecountyil.gov · risk@lakecountyil.gov

18 N. County Street, Seventh Floor, Waukegan, Illinois 60085

cc sheriff@lakecountyil.gov · warrants@lakecountyil.gov · NShepherd@lakecountyil.gov · BDillon@lakecountyil.gov
FDeRosa@lakecountyil.gov · MJunkin@lakecountyil.gov · MCervantes@lakecountyil.gov · courts@lakecountyil.gov**SUBJECT****Response to request FOIA 8745, routed to litigation counsel before release**

Production of July 29, 2026, page 217 · 50 pages masked · pending: 1:26-cv-06738, 1:26-cv-01077, and Appeal No. 2-26-0352

Ms. Nelson, Mr. Brown, and Ms. Osinski:

On July 29, 2026 Lake County produced 805 pages of internal electronic mail concerning the undersigned. One page of it is addressed to the Chief Deputy of the Civil Trial Division. This letter asks that office to state its position on that page, and places a litigation hold.

I. THE DOCUMENT AT ISSUE**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.”]

The Freedom of Information Act commits the response to a public body’s Freedom of Information officer and requires that any denial be in writing, specifying the exemption claimed and the reasons for it. 5 ILCS 140/9(a). The Civil Trial Division of the State’s Attorney’s Office represents Lake County and its officers in the matters in which the undersigned is the adverse party. The production records the Sheriff’s draft response moving to that office before release.

II. CHRONOLOGY DISCLOSED BY THE SAME PRODUCTION

Date and time	Page of the production	What it records
Jul 15, 2026 1:36 p.m.	225	Sergeant, Civil Process and Warrants, forwards the May 28 warrant notification to the Records Supervisor.



Date and time	Page of the production	What it records
Jul 15, 2026 2:17 p.m.	228–229	The Sheriff's Warrant Details record is printed under login <i>sd.rcasas</i> . Status: Active. Category: Felony. The charges are the two 2022 traffic offences, occurrence date 5/23/2022, with no bond amount.
Jul 15, 2026 2:28 p.m.	217	Records Supervisor forwards it to the Chief Deputy, Civil Trial Division, with "FOIA 8745 Draft Response."
Jul 17, 2026 3:13–7:39 p.m.	593, 754, 789, 449	Four separate notices from the undersigned routed to the same Chief Deputy within hours.
Jun 26 – Jul 10, 2026	445–447, 547–552	County counsel corresponds with the Office of the Attorney General on "Allababidi, 26 C 1077 (N.D. Ill.)," including "Q re probation/parole officers."
Jul 1, 2026 10:44 a.m.	447	Request that the Attorney General represent Judge Stride, circulated with Chief Judge Daniel B. Shanes copied.

Fifty pages of the production carry visible solid-black masking. Twenty-nine of them are email or thread pages. The withholding is on the face of the production. No written statement of the specific exemption claimed for each accompanied it.

III. THE STANDARD SET BY THE VILLAGE OF LINCOLNSHIRE

On July 20, 2026 the Village Manager of Lincolnshire responded in one page, 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.**"*]

Lincolnshire is the agency the Lake County Sheriff's own Warrant Details record names as the issuing agency for warrant 314270. It acknowledged a hold running from June 6, 2026, confirmed retention, and volunteered compliance with the Public Access Counselor. No comparable writing has issued from any Lake County office. The hold set out below asks for the same three things.

IV. LITIGATION HOLD

The following are relevant to *Allababidi v. Shepherd*, No. 1:26-cv-06738 (N.D. Ill.), to *Allababidi v. Junkin*, No. 1:26-cv-01077 (N.D. Ill.), and to Appeal No. 2-26-0352, each pending. Suspend any ordinary-course deletion, purge, overwrite, rotation, or retention schedule that would affect them:

- 1 All electronic mail, attachments, and calendar entries of the Civil Trial Division, the Office of the Sheriff, Adult Probation, Courtroom T611 staff, and Risk Management concerning the undersigned or No. 23 CF 1146.
- 2 The complete file for request FOIA 8745, including every draft, review comment, redaction log, and transmittal record, and the identity of each person who reviewed or approved the response.
- 3 The unredacted originals of every page masked in the July 29, 2026 production, together with the exemption asserted for each and the person who asserted it.
- 4 All communications with the Office of the Attorney General, the Administrative Office of the Illinois Courts, and the Office of the Chief Judge concerning representation of Judge Christopher R. Stride, Matthew Junkin, or Margaret Fontana.



- 5 All records of the transmission, docketing, or classification of any instrument filed by the undersigned in No. 23 CF 1146, including the audit history of every docket entry.

V. REQUESTS

- 1 State whether any attorney of the Civil Trial Division reviewed, revised, or approved the response to FOIA 8745 before its release, and identify each such attorney.
- 2 Identify the Freedom of Information officer who issued that response and confirm that the written denial required by section 9(a) was issued for each withheld or masked page.
- 3 Confirm the litigation hold in writing, and identify the custodian for each category above.
- 4 State the County's position on the Warrant Details record at production pages 228 through 229. A warrant issued on a 2026 petition to revoke probation is carried in the Sheriff's system as an active **felony** on the two 2022 traffic offences disposed of by the plea of September 8, 2025, with no bond amount and with a municipal police department named as issuing agency. Correcting a data field requires no court's permission. Confirm whether it will be corrected, and by when.

WRITTEN RESPONSE REQUESTED BY AUGUST 5, 2026

This letter is notice for purposes of each pending action identified above. 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

5 ILCS 140/9 and 140/9.5 · litigation hold in three pending actions

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	"FOIA Guidance" — the draft response, routed to the Civil Trial Division Records Supervisor, Sheriff's Office, to Chief Deputy, Civil Trial Division, July 15, 2026, 2:28 p.m.	PROD-000217
B	Representation coordination with the Attorney General and the AOIC June 26 and July 1, 2026. The July 1 request is circulated with the Chief Judge copied.	PROD-000446 – PROD-000447
C	A masked email page as produced One of fifty pages carrying visible solid-black masking.	PROD-000386
D	Village of Lincolnshire — acknowledgment of litigation hold and PAC compliance July 20, 2026. The comparator: a written hold, a retention confirmation, and an offer of PAC compliance, in one page.	LINC-000001
E	Warrant Details — the Sheriff's database record, printed July 15, 2026 at 14:17 Status: Active. Category: Felony. Issuing agency: Lincolnshire Police Department.	PROD-000228 – PROD-000229



A

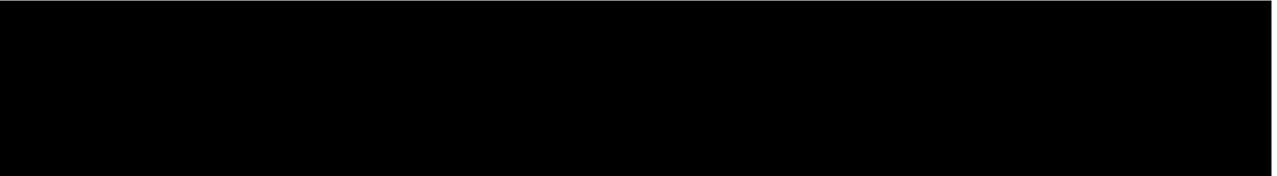
**"FOIA Guidance" — the draft response, routed to the Civil
Trial Division**

PROD-000217

Records Supervisor, Sheriff's Office, 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

CONFIDENTIAL INFORMATION: This electronic message and any attachments are confidential and intended solely for the use of the person to whom it was addressed. Any other interception, copying, accessing, screenshotting, or disclosure of this message without the express authorization of the Sheriff is prohibited. If you have received this message in error, please immediately notify the sender and purge the message you received.



B

Representation coordination with the Attorney General and the AOIC

PROD-000446 – PROD-000447

June 26 and July 1, 2026. The July 1 request is circulated with the Chief Judge copied.

Katherine M. Doersch
Chief, Criminal Appeals Division
Office of the Illinois Attorney General
Mobile: (773) 690-7078
Email: katherine.doersch@iag.state.il.us
119 South LaSalle Street
Chicago, Illinois 60603

From: Arnold, Michael <Michael.Arnold@iag.state.il.us>
Sent: Friday, June 26, 2026 12:23 PM
To: Doersch, Katherine <Katherine.Doersch@iag.state.il.us>
Cc: Laurent, Katherine <Katherine.Laurent@iag.state.il.us>; Fletcher, Christopher <Christopher.Fletcher@iag.state.il.us>
Subject: FW: Q re probation/parole officers

See below from AOC on the habeas issue

From: Katherine Murphy <kmurphy@illinoiscourts.gov>
Sent: Friday, June 26, 2026 12:12 PM
To: Arnold, Michael <Michael.Arnold@iag.state.il.us>
Subject: EXTERNAL: Re: Q re probation/parole officers

-- Mike

These are probation officers and the State via the Supreme Court/AOC (it reimburses the County for their salaries - The request for AG representation should have come to you from either the AOC or the Chief Judge's Office (CJL). If there are ok because probation officers are County employees) If you got the request directly from the officers and not CJL, I would tell the officers to submit their request to the CJL first. Then CJL can either submit the request to you directly or to me. We just want to make sure the Chief Judge is aware of this case. Let me know if you have any questions. Thanks

Sincerely

Kate Murphy
Chief Legal Counsel

From: [Maria Pellegrino](#)
To: [Bieszczak, Frank](#); [Griffis, Carson](#)
Cc: [Katherine Murphy](#); [Gabriela Zavala](#); [Lorena E. Hernandez](#); [Daniel B. Shanes](#); [Karl Walldorf](#)
Subject: [EXTERNAL] Reqs. for Representation –Allababidi v. Hon. Christopher R. Stride (Ill. Sup. Ct. 133301 (Mot for Sup. Order)); Allababidi v. Junkin/Fontana (7th Circ Case No. PDG)
Date: Wednesday, July 1, 2026 10:44:25 AM
Attachments: [Allababidi v. Hon. C. Stride \(Ill. Sup. Ct. 133301 Mot for Sup Order\).pdf](#)
[AG Representation Request for Judge Stride-Meg Fontana-Matthew Junkin.pdf](#)
[EMERGENCY MOTION INJUNCTION PENDING APPEAL 05272026.pdf](#)
[EMERGENCY PETITION WRIT MANDAMUS 05272026.pdf](#)
[NOTICE OF INTERLOCUTORY APPEAL 05272026.pdf](#)

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

Good morning,

Req. for Representation –Allababidi v. Hon. Christopher R. Stride (Ill. Sup. Ct. 133301 (Mot for Sup. Order)

Please see the attached request for representation and case documents (some saved here; larger files are available in link provided in request letter). Please consider this our formal request that the Office of the Attorney General provide legal representation to the Judge Christopher R. Stride.

Our office would appreciate being notified of the Assistant Attorney General assigned to the case and of the ultimate disposition of the matter. Please be advised that the AOIC must be included in settlement negotiations, if any.

Req. for Representation – Allababidi v. Junkin/Fontana (7th Circ. Case No. PDG)

In addition, please see the attached request for representation and case documents related to actions naming probation department employees in a 7th Circuit appeal of Northern District case number 1:26-cv-01077. Please consider this our formal request that the Office of the Attorney General provide legal representation to:

- Margaret K. Fontana, Director, Division of Adult Probation Services, 19th Judicial Circuit and
- Matt Junkin, Adult Probation Officer, Lake County

Our office would appreciate being notified of the Assistant Attorney General assigned to the case and of the ultimate disposition of the matter. Please be advised that the AOIC must be included in settlement negotiations, if any. This request does not indicate an agreement by the AOIC to pay costs or damages related to this matter.



C

A masked email page as produced

PROD-000386

One of fifty pages carrying visible solid-black masking.

From [REDACTED]

Sent: Wednesday, July 23, 2025 9:29 AM

To: Francis De Rosa <FDeRosa@lakecountvil.gov>

Cc: Oscar Posterli <oscar@posterilaw.com>; Jacklyn Mullin <JMullin@lakecountvil.gov>;
Nicholas Shepherd <NShepherd@lakecountvil.gov>

Subject: Re: [EXTERNAL] Re: People v. Allababidi, 23CF1146- Availability reply

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

Mr. De Rosa,

Good morning to you. It is always a pleasure to hear from you. I, like you, also wish the news were more favorable. However, what can one do when someone is willing to involve the courts and others, all for their own opportunity to exploit loopholes? I had hoped to present my statement to the judge and the defendant, but unfortunately, the situation has been beyond my control and continues to be so. I am, regrettably, becoming accustomed to this.

[REDACTED]

Thankfully, I continue to be blessed in this life. [REDACTED]

[REDACTED]

I look forward to further communication regarding my case and its progress. Mr. De Rosa, I understand the complexity of your position and how it pertains to cases such as these. I have faith in you and your willingness to help the court, the judge, and, most importantly, the defendant understand the necessity for the defendant to be held accountable for their obvious and blatant disregard for public safety, their own safety, and, my primary concern, my safety. I will continue to pray for all aspects to unfold as the good Lord wills.

I am confident that karma is something not to be trifled with, and the



D

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

LINC-000001

*July 20, 2026. The comparator: a written hold, a retention confirmation, and an offer of PAC
compliance, in one page.*



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



E

**Warrant Details — the Sheriff's database record, printed July
15, 2026 at 14:17**

PROD-000228 – PROD-000229

Status: Active. Category: Felony. Issuing agency: Lincolnshire Police Department.



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