



No. 2-26-0352

IN THE

APPELLATE COURT OF THE STATE OF ILLINOIS

SECOND JUDICIAL DISTRICT

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|                                  |   |                               |
|----------------------------------|---|-------------------------------|
| PEOPLE OF THE STATE OF ILLINOIS, | ) | Appeal from the Circuit Court |
|                                  | ) | of the 19th Judicial Circuit, |
| Plaintiff-Appellee,              | ) | Lake County, Illinois.        |
|                                  | ) |                               |
| -vs-                             | ) | No. 23 CF 1146                |
|                                  | ) |                               |
| EHAB ALLABABIDI,                 | ) | Honorable                     |
|                                  | ) | Christopher R. Stride,        |
| Defendant-Appellant.             | ) | Judge Presiding.              |

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THE PEOPLE'S FIRST MOTION FOR SANCTIONS

The People of the State of Illinois, by Eric F. Rinehart, State's Attorney of Lake County, Illinois, through Edward R. Psenicka, Deputy Director, and Max C. Boose, Staff Attorney, State's Attorneys Appellate Prosecutor, respectfully move for sanctions against defendant for violating this Court's Orders.

IN SUPPORT THEREOF, IT IS AVERRED THAT:

1. On July 28, 2026, defendant filed an "Omnibus Emergency Motion" and other filings with this Court, seeking among other matters for this Court to appoint appellate counsel. Def. Omnibus Em. Mtn. p. 1, 2. On July 31, 2026, this Court granted defendant's "omnibus emergency motion" as to appointing the Office of the State Appellate Defender ("OSAD"), and ordered that defendant must not either file documents with this Court or "communicate by any means with appellee's counsel."

2. Around this time period, defendant filed numerous *pro se* supplements and replies to the People's filings while citing seven lawsuits he had filed to that point as "coordinated proceedings," as well as belligerent direct communications to the People as shown by the exhibit attached to their objection to the motions regarding counsel, in which defendant identified at least two disciplinary allegations he filed against Assistant State's Attorneys while asserting he would file further allegations alongside his "demand for withdrawal." Def. July 31, 2026, Letter, pp. 7-9; Def. 4th Supp., pp. 5, 9.

3. On August 7, 2026, this Court denied defendant's motions to remove OSAD. This Court ruled that "the number and nature of appellant's filings make very clear that the appointment of counsel, which appellant again repeatedly requested, is necessary to maintain the integrity and efficiency of the appellate process." It further referenced the bar on defendant communicating directly with the undersigned office, holding that "this court's order of July 31 will stand."

4. On August 18, 2026, defendant filed a motion to modify order, wherein he did not challenge the prohibition on direct contact with the office of the State's Attorneys Appellate Prosecutor. Def. Mtn. Modify Order, p. 2. On August 21, 2026, this Court granted defendant's motion to modify its July 31, 2026, ruling that "this court's intent in entering that order was to prohibit communication only with appellee's *appellate* counsel." (emphasis in original).

5. On August 23, 2026, defendant directed electronic correspondence to the undersigned office in violation of this Court's unambiguous orders. Defendant included the 2nd District ILSAAP email account in the "To" recipient box, and confirmed the intended recipients in the body of the email: "State's Attorneys Appellate Prosecutor / Lake County State's Attorney." See Def. Aug 23 Email, attached as Exhibit 1. Defendant includes demands for various actions styled as

“administrative returns.” Ex. 1. Defendant explicitly confirms that directing the correspondence to the undersigned office was intentional, stating “Appellate counsel are copied for transparency.” Ex. 1. The email sender is defendant’s address which he has previously listed with this Court as his own, and defendant ends the document with his own name. Ex. 1. Defendant’s attached document lists this appeal’s case name and Second District case number, and demands action for seven responses. Def. Email Attachment, attached as Exhibit 2. The body of the attachment confirms defendant’s intentional communication to the undersigned office, stating “Appellate counsel are copied here for transparency” while also acknowledging this Court’s ruling from August 7, 2026, stating he is “represented in the appeal.” Ex. 2, p. 1. Defendant’s attachment is also consistent with prior correspondence directed to the undersigned office. Ex. 2; Def. July 31, 2026, Letter.

6. The People submit that defendant has violated the plain language of this Court’s Orders, and indicates an intention to continue sending successive correspondence and demands for responses. In light of defendant’s plain refusal to obey this Court’s Orders, the People request such sanctions as this Court deems appropriate to ensure compliance with its Orders.

7. The undersigned has supplied a copy of this motion to opposing counsel for their position. Opposing counsel has indicated they will not file a response.

WHEREFORE, for the foregoing reasons, the People of the State of Illinois respectfully request that this Court enter sanctions against defendant for violating its Orders.

Respectfully submitted,

Eric F. Rinehart  
State's Attorney  
Lake County  
Waukegan, Illinois 60085  
(847) 377-3000

Edward R. Psenicka  
Deputy Director

By /s/ Max C. Boose  
Max C. Boose  
Staff Attorney  
State's Attorneys  
Appellate Prosecutor  
2032 Larkin Avenue  
Elgin, Illinois 60123  
(847) 697-0020  
2nddistrict.eserve@ilsaap.org

STATE OF ILLINOIS       )  
                                      ) SS  
COUNTY OF LAKE        )

VERIFICATION

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the above statements are true to the best of my knowledge and belief.

/s/ Max C. Boose  
Max C. Boose

**From:** [2nd District](#)  
**To:** [Max Boose](#); [Edward R. Psenicka](#)  
**Cc:** [Lake County](#)  
**Subject:** Fw: FOLLOW-UP / RECORD LOCK — No. 2-26-0352 — July 30 Hold / Aug. 4 Deadline / Preservation Status Due Aug. 25  
**Date:** Monday, August 24, 2026 9:06:45 AM  
**Attachments:** [SAAP RECORD LOCK AUG23.pdf](#)

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Thank you,

Shari Lavick, Administrative Secretary  
State's Attorneys Appellate Prosecutor  
2032 Larkin Avenue  
Elgin, Illinois 60123  
(847) 697-0020  
[2nndistrict.eserve@ilsaap.org](mailto:2nndistrict.eserve@ilsaap.org)

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**From:** Ehab Hilfiger <[defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)>  
**Sent:** Sunday, August 23, 2026 8:53 PM  
**To:** 2nd District; [statesattorney@lakecountyil.gov](mailto:statesattorney@lakecountyil.gov)  
**Cc:** [Christopher.McCoy@osad.state.il.us](mailto:Christopher.McCoy@osad.state.il.us); [Jaime.Montgomery@osad.state.il.us](mailto:Jaime.Montgomery@osad.state.il.us);  
[2ndDistrict@osad.state.il.us](mailto:2ndDistrict@osad.state.il.us)  
**Subject:** FOLLOW-UP / RECORD LOCK — No. 2-26-0352 — July 30 Hold / Aug. 4 Deadline / Preservation Status Due Aug. 25

State's Attorneys Appellate Prosecutor / Lake County State's Attorney:  
Attached is a compact follow-up to the July 30 litigation-hold and correction package. I am not resending the 48 pages you already received. The August 4 deadline has expired, and I have not located a written response from either office in the sending mailbox.  
Because OSAD now represents me in the appeal, this is not a merits brief and asks no merits concession. It asks for seven verifiable administrative returns only: whether the hold issued; whether any correction/supplement was filed; whether the May 28 and June 17 ECR recordings and access/export logs are preserved; whether the DeRosa tenant-lifecycle records are preserved; whether the June 15 Odyssey/eFile audit trail is preserved; and whether you dispute the identity/authenticity of any source record in the July 30 exhibit register.  
A seven-line response is sufficient. Please return it by 5:00 P.M. CDT Tuesday, August 25, 2026. Silence will be recorded only as no response located by the deadline, not as agreement or admission.  
Appellate counsel are copied for transparency.  
Respectfully and without waiver,  
Ehab Allababidi



**FOLLOW-UP / RECORD LOCK**

## People v. Allababidi - Appeal No. 2-26-0352

**RE:** July 30 litigation hold and correction demand | August 4 deadline expired | preservation and docket-status return only

**WRITTEN RESPONSE REQUESTED BY 5:00 P.M. CDT TUESDAY, AUGUST 25, 2026**

The original 48-page package is not reattached. You already received it. This follow-up asks for the small set of binary or docket-identifiable answers that remain independently verifiable after the August 4 deadline.

### I. THE PURPOSE OF THIS FOLLOW-UP

The July 30 letter separated legal disagreement from preservation and correction. It identified the exact rule texts, the exact paragraphs challenged, the May 28 and June 17 ECR records, the DeRosa recipient-status chronology, and the docket-entry audit issue. Its response deadline passed on August 4. I have not located a written response from the State's Attorneys Appellate Prosecutor or the Lake County State's Attorney in the sending mailbox. This letter does not repeat the merits argument. It locks the post-notice record.

The Illinois Appellate Court has since denied the requested stay of sentence while granting counsel's motion to modify the July 31 order. Appellate counsel are copied here for transparency. Because I am represented in the appeal, this transmission is limited to preservation, correction-status identification, and administrative record ownership; it is not an attempt to brief the merits outside counsel.

### II. SEVEN RETURNS THAT RESOLVE THE ADMINISTRATIVE RECORD

| # | RETURN                | EXACT QUESTION                                                                                                                                                                                                |
|---|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Litigation hold       | Was the July 30 preservation hold issued? If yes, identify by title the person/unit responsible. If no, state no.                                                                                             |
| 2 | Filed correction      | Did the People file any correction, supplement, withdrawal, or amended position responsive to the July 30 notice? Identify title/date or state none.                                                          |
| 3 | May 28 ECR            | Confirm whether the May 28, 2026 Courtroom 611 electronic recording and access/export logs are preserved.                                                                                                     |
| 4 | June 17 ECR           | Confirm whether the June 17, 2026 Courtroom 611 electronic recording and access/export logs are preserved.                                                                                                    |
| 5 | DeRosa tenant records | Confirm preservation of recipient-object lifecycle, alias/proxy, mailbox/retention, message-trace, and audit records for fderosa@lakecountyil.gov for June 1-July 30, 2026.                                   |
| 6 | Odyssey/eFile audit   | Confirm preservation of audit history for the June 15, 2026 entry displayed publicly as "Correspondence," including document-type assignment and actor identity.                                              |
| 7 | Source dispute        | If you dispute the identity/authenticity of any source record listed in the July 30 enclosure register, identify the exhibit letter and the specific basis. Otherwise state no source-identification dispute. |

### III. WHAT THIS LETTER DELIBERATELY DOES NOT DO

It does not demand a concession on the stay, jurisdiction, or merits. It does not condition any disciplinary or agency submission on settlement or corrective action. It does not assert that any person destroyed evidence. It does not ask a represented party's adversary to bypass appellate counsel. It asks whether preservation happened and whether any correction was filed after notice. Those facts are either true or false on fixed dates.



#### **IV. WHY THE ORIGINAL PACKET IS NOT REATTACHED**

The July 30 letter itself made the point: padding a follow-up with paper the recipient already possesses is how a record gets skimmed. The original package remains the operative notice. This follow-up is a receipt-and-status instrument. If your office needs the original retransmitted for administrative reasons, say so and I will send the identical preserved copy, not a rewritten substitute.

#### **V. DEADLINE AND RESPONSE FORM**

A seven-line response keyed to items 1-7 is sufficient. Please return it by **5:00 P.M. CDT Tuesday, August 25, 2026**. Silence will be recorded only as no response located by the deadline, not as agreement, admission, or waiver.

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



No. 2-26-0352

E-FILED  
Transaction ID: 2-26-0352  
File Date: 8/25/2026 11:04 AM

Jeffrey H. Kaplan, Clerk of the Court  
APPELLATE COURT 2ND DISTRICT

IN THE  
APPELLATE COURT OF THE STATE OF ILLINOIS  
SECOND JUDICIAL DISTRICT

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| PEOPLE OF THE STATE OF ILLINOIS, | ) | Appeal from the Circuit Court |
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| Plaintiff-Appellee,              | ) | Lake County, Illinois.        |
|                                  | ) |                               |
| -vs-                             | ) | No. 23 CF 1146                |
|                                  | ) |                               |
| EHAB ALLABABIDI,                 | ) | Honorable                     |
|                                  | ) | Christopher R. Stride,        |
| Defendant-Appellant.             | ) | Judge Presiding.              |

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NOTICE AND PROOF OF SERVICE

TO: Christopher McCoy, Deputy Defender  
Office of the State Appellate Defender  
Second Judicial District  
2nndistrict.eserve@osad.state.il.us

Under the penalties provided in law pursuant to Section 1-109 of the Code of Civil Procedure, I hereby certify that the People's motion for sanctions in the above-entitled cause is being electronically filed with the Clerk of the Appellate Court, Second District, on August 25, 2026. Upon acceptance of the filing from this Court, the party listed above will be served using the court's electronic filing system.

/s/ Luisa Gonzalez  
Luisa Gonzalez, Legal Secretary  
State's Attorneys Appellate Prosecutor  
2032 Larkin Avenue  
Elgin, Illinois 60123  
(847) 697-0020  
2nndistrict.eserve@ilsaap.org