



No. 2-26-0352

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

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.

OBJECTION TO DEFENDANT'S MOTION TO DISCHARGE APPOINTED COUNSEL AND
PRO SE MOTION TO VACATE THE APPOINTMENT OF COUNSEL

The People of the State of Illinois, by Eric F. Rinehart, State's Attorney of Lake County, Illinois, Edward R. Psenicka, Deputy Director, and Max Boose, Staff Attorney, State's Attorneys Appellate Prosecutor, respectfully object to defendant's Motion to Discharge Appointed Counsel and corresponding *pro se* motion to vacate the appointment of counsel.

IN SUPPORT THEREOF, IT IS AVERRED THAT:

1. On June 14, 2023, defendant was indicted for both speeding 35 or more mph above the speed limit, and aggravated reckless driving resulting in great bodily harm, permanent disability, or disfigurement to another. Docket Sheet pp. 1-3; 625 ILCS 5/11-601.5(b) (eff. Jan. 1, 2014); 625 ILCS 5/11-503(a)(1), 5/11-503(c) (eff. June 1, 2008). On September 8, 2025, defendant pled guilty, and was sentenced by agreement to 30 months of probation with conditions. Docket Sheet pp. 2-3.
2. On November 17, 2025, this Court dismissed defendant's direct appeal.
3. On May 14, 2026, the People filed a petition to revoke probation. Docket Sheet, p. 7.

4. Defendant's *pro se* notice of appeal for this case, dated July 10, 2026, and filed on July 23, 2026, includes that "appointment of counsel on appeal is requested under Ill. S. Ct. Rule 607(a)."

5. On July 28, 2026, at or after 10:38 p.m., defendant filed an "Omnibus Emergency Motion" and other filings with this Court, seeking among other matters for this Court to intervene in the circuit court lifting the stay on defendant's 180 day jail sentence. Notice of Filing, p. 1; Def. Omnibus Em. Mtn. p. 1. That motion included a request for this Court to "DIRECT a Rule 607(a) indigency determination within three court days, *APPOINT appellate counsel on that finding*, and ORDER the report of proceedings under Rule 607(b)." Def. Omnibus Em. Mtn. p. 1 (emphasis added by the undersigned). In the corresponding argument, defendant asserts in part that "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." Def. Omnibus Em. Mtn. p. 2 (emphasis added).

6. On July 29, 2026, at 8:02 a.m., defendant filed a document seeking to supplement his pending motion. The same day, at 6:57 p.m., he filed a second set of documents he asserts are supplemental but do not change the obligations of the court in ruling on his motion.

7. On July 30, 2026, the People filed an objection to defendant's request that this Court stay the jail sentence before his next circuit court date, primarily focused on the apparent multiplicative litigations defendant pursued on the same matter, the circuit court's status as finder of fact, and deficiencies in the record to justify the extraordinary relief requested. On the same date, defendant filed a number of documents including a response to the People's objection, a third set of supplemental documents, and a proposed order. The proposed order's paragraph 4 states: "The circuit court shall make the determination required by Ill. S. Ct. R. 607(a) within three court days of this order, and upon a finding of indigency shall appoint counsel on appeal."

8. 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 refrain from filing documents or contacting appellee's counsel.

9. On August 4, 2026, defendant filed an emergency motion to vacate the appointment of OSAD counsel, misstating: "that relief not having been requested by any party" and that "[h]e did not request counsel in this Court." Def. Mtn. Vacate Appt., pp. 1, 5. Defendant filed documents titled a fourth supplemental supporting record. Those documents include correspondence from defendant to appellate counsel with drafts, and asserts: "[t]his appeal is one of seven coordinated proceedings" while citing an assortment of civil and criminal cases with defendant as an apparent named party. Def. 4th Supp., pp. 5, 9. Defendant also stated he did not demand that counsel adopt any argument, did not demand withdrawal of counsel, and was "not an invitation to file anything you do not believe is supportable." Def. 4th Supp., pp. 9-10. Defendant attached his attorney's response, detailing defendant's disagreement with OSAD's scope of representation, including filing documents in the circuit court. Def. 4th Supp., p. 13.

10. On August 4, 2026, defendant filed a motion to discharge OSAD as counsel. Therein, defendant indicated he wished to discharge OSAD to "be in control of the issues he raised on appeal." Def. Mtn. Discharge, pp. 2-3. Defendant cites the applicable statute and Illinois Supreme Court Rule for the appointment of counsel "if a defendant is indigent and 'desires counsel on appeal.' ") Def. Mtn. Discharge, p. 3 (citing Ill. Sup. Ct. R. 607(a); and 725 ILCS 5/121-13(a) (eff. Jan. 1, 2024)). As shown above, there is no legitimate dispute that defendant asserted his indigency and desire for counsel on appeal before OSAD's appointment.

11. Based on his *pro se* and represented filings described above, defendant's desire to withdraw are based on his desire to control OSAD counsel's representation. The Supreme Court of the United States has established that there is no constitutional right to appellate self-representation. *Martinez v. Ct. of Appeal of California, Fourth App. Dist.*, 528 U.S. 152, 163 (2000). It explained that courts have discretion allowing a person to proceed *pro se*, and that individual autonomy principles are outweighed by governmental interests in ensuring the integrity and efficiency of the appellate process. *Id.* at 161, 163. To the extent defendant seeks to relegate OSAD to being "standby or consulting counsel only," Def. Mtn. Vacate, p. 2, defendant has not established a legal right to it.

12. Defendant's motion to discharge OSAD also cites language from the Fourth District "that 'the appointment of counsel – and *arguably*, the counsel's continuing tenure – is conditional on the defendant's desire for such counsel.'" Def. Mtn. Discharge, p. 3 (citing *People v. Jackson*, 362 Ill.App.3d 1196, 1199 (4th Dist. 2006)) (emphasis added by the undersigned). *Jackson* confirmed that both timeliness and insufficient support were grounds for rejecting a request for self-representation: "they must assert that right in a timely (and, we might add, effective) manner." *Id.* at 1199. The Fourth District subsequently reinforced this ruling by rejecting the claims of insufficient communication and waiving contentions on the basis of strategy. *People v. Thomas*, 2022 IL App (4th) 210746-U, ¶ 36 (cited as persuasive authority pursuant to Ill. Sup. Ct. R. 23(e)(1) (eff. Jun. 3, 2025)). Defendant's motion to discharge OSAD acknowledges that the *Jackson* decision denied the defendant's request for self-representation, asserting that was based on the timing of the request after full briefing in light of judicial efficiency concerns outweighing the defendant's interest in self-representation. Def. Mtn. Discharge., p. 3. However, the analysis of *Jackson* went further, establishing that pursuant to United States Supreme Court precedent, defendants "have no federal

constitutional right to self-representation on appeal.” *Jackson*, 362 Ill.App.3d at 1198-99 (citing *Martinez v. Court of Appeal of California*, 528 U.S. 152, 154 (2000)); see also *Thomas*, 2022 IL App (4th) 210746-U, ¶ 32. While the *Thomas* defendant moved to withdraw after the People’s response and before his reply, the limitations on the right to self-representation bear on defendant’s motion, in particular where that defendant challenged his counsel’s discretion in proceeding on some but not all of his claims. See *id.*, ¶¶ 25-26, 35.

13. Given the expedited, numerous, and voluminous filings by defendant *pro se*, there are judicial economy and improper purpose concerns in this case. Defendant’s serial and successive filings in this case, and the litigation strategy of filing numerous lawsuits as – to date – “seven” or “five” coordinated proceedings, bear on this Court’s discretion. Def. 4th Supp., p. 9; Def. Mtn. Vacate Appt., p. 6. This Court’s July 31, 2026 Order – to appoint counsel and refrain from filing documents with this Court or communicate with appellee’s counsel – is further justified by defendant’s harassing “Notice of Disciplinary Referral” dated July 30, 2026, detailing his four prior, as well as future, intended ARDC claims against various representatives of the People including the undersigned, as well as varying demands and vexatious litigation tactics for these and other proceedings. See Defendant’s July 31, 2026, Letter, attached as Exhibit 1, pp. 7-9. Given the correspondence provided by defendant in regards to OSAD’s position, and demonstrated mischaracterization of the record by requesting counsel in multiple filings including his notice of appeal before denying in his motion that he did so, there are also current and future concerns of frivolous or inappropriate argument in this Court.

14. Defendant otherwise has not established grounds for rejecting counsel’s appointment on appeal, as OSAD counsel has explicitly confirmed their willingness to seek the relief they may

ethically pursue: a stay on the circuit court's June 17, 2026 order. Def. 4th Supp., p. 13. Defendant's insistence on OSAD pursuing issues that are not cognizable for them shows that judicial economy is served by their involvement in the case. See *Martinez*, 528 U.S. at 163 (stating "[t]he requirement of representation by trained counsel implies no disrespect for the individual inasmuch as it tends to benefit the appellant as well as the court."). To the extent defendant's filings are based on his attempt to pursue a frivolous or otherwise improper argument, it has no value and therefore cannot weigh in favor of discharging counsel. See *Jackson*, 362 Ill.App.3d at 1200.

15. The People therefore object to defendant's motion to withdraw counsel.

WHEREFORE, for the foregoing reasons, the People of the State of Illinois respectfully request that this Court deny defendant's Motion to Discharge Appointed Counsel.

Respectfully submitted,

Eric F. Rinehart
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(847) 377-3000

Edward R. Psenicka
Deputy Director

By /s/ Max C.. Boose
Max C. Boose
Staff Attorney
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STATE OF ILLINOIS)
) SS
COUNTY OF KANE)

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

SERVED THE DAY THE OBJECTION WAS FILED · DOCUMENTED NOTICE TO OPPOSING
COUNSELWRITTEN RESPONSE DUE 5:00 P.M. TUESDAY,
AUGUST 4, 2026

Litigation Hold, Demand for Withdrawal, and Notice of Disciplinary Referral

Max C. Boose, Staff Attorney · Office of the State's Attorneys Appellate Prosecutor
2032 Larkin Avenue, Elgin, Illinois 60123 · (847) 697-0020 · 2nndistrict.eserve@ilsaap.org
Signatory and verifying affiant, Objection filed July 30, 2026

COPY: Edward R. Psenicka, Deputy Director, State's Attorneys Appellate Prosecutor · 2nndistrict.eserve@ilsaap.org

COPY: Eric F. Rinehart, State's Attorney of Lake County · 18 North County Street, Waukegan, Illinois 60085 ·
statesattorney@lakecountyil.gov

COPY: Sandra J. Lorigan, Legal Secretary (certifying officer on the proof of service)

MATTER

People v. Allababidi, No. 2-26-0352 (Ill. App. Ct., 2d Dist.) — Lake County No. 23 CF 1146

Objection to emergency request to stay sentence, filed and verified July 30, 2026 · Rule 323(a) designation window closes August 4, 2026 · Rule 323(c) amendments due August 13, 2026 · circuit court date August 6, 2026

Counsel:

Mr. Boose: you signed the Objection twice today — once as counsel, and once on a page headed **VERIFICATION** under 735 ILCS 5/1-109, which makes a false statement of material fact in a certified document a Class 3 felony. I want to draw the line myself, at the top, because it runs through everything below. **A legal contention is not a statement of fact.** I do not assert that your citations to Rules 303(a)(2), 615(a) and 609(a) implicate section 1-109, and I will not assert it later; they implicate Rules 3.3(a)(1) and 3.3(a)(2), which for a lawyer is the more durable problem, because the criminal statute needs a state of mind you can dispute and the professional rule attaches the moment you read this. Section 1-109 reaches the *factual* representations — the characterizations in paragraph 4, the assertion in paragraph 7, and footnote 1, in which you disclaim the accuracy of the very records you were certifying while asking a reviewing court to dismiss an appeal on them.

You signed all of it in a case in which a 180-day jail term was activated on an oral motion at a call captioned “Status,” and in which a warrant for what the warrant itself calls a “technical violation” has been outstanding for sixty-three days. This letter is not a response to your Objection; that was filed and served separately today. It does three things. It places a litigation hold on you, on your office, and on the office that transmitted this file to you. It demands the withdrawal of six representations, by paragraph number, by 5:00 p.m. Tuesday, August 4, 2026. And it tells you, before you decide anything, exactly what I am going to do with the Objection you have already filed — in what order, on what timetable, and with what I expect each step to produce, including the steps I expect to produce nothing. Nothing is characterized here that is not quoted, and nothing is quoted that is not produced.

One note on the enclosures, because it is a substantive point and not a housekeeping one. **Your Objection is not attached to this letter. Neither is my Response, nor the Rule 323(c) proposed report of proceedings, nor the July 28 notice to counsel of record in the federal habeas case.** You filed the first and you were served the other three this afternoon; you know what is in all four, and padding a demand letter with paper the recipient already has is how a demand letter gets skimmed. What is attached is the nine documents you do *not* have, trimmed to the pages that carry the language I quote. Twenty-seven pages, Bates BOOSE-000001 through BOOSE-000027. Every one of them is either the State's own record or a document generated by a government office or a regulated insurer. None of them is mine.



I. WHAT YOU FILED, AND WHAT YOU CERTIFIED WHEN YOU FILED IT

The instrument is nine pages, ends with your electronic signature over the words “Staff Attorney, State’s Attorneys Appellate Prosecutor,” and carries a separate page headed **VERIFICATION** bearing your signature a second time. Eric F. Rinehart, State’s Attorney of Lake County, and Edward R. Psenicka, Deputy Director, appear above you on the signature block. Sandra J. Lorigan certified service, also under section 1-109. It attaches five exhibits. Not one of them is the June 17, 2026 order under review, the May 28, 2026 minute sheet, the petition to revoke, or any part of the proceeding this appeal concerns.

Take the five in order, because the set is doing work no sentence in your brief admits to. Exhibit 1 is this Court’s November 17, 2025 order dismissing a *different* appeal — the direct appeal from a negotiated guilty plea — for failure to file a Rule 604(d) motion. Rule 604(d) governs appeals from pleas. It has no application to an appeal from an order lifting a stay on a sentence already imposed, and you do not argue that it does; you simply put the word “dismissed” in front of the panel in my name. Exhibits 2 and 5 are one-line denials of emergency supervisory relief. Exhibits 3 and 4 are one-line denials of *leave to file* an original writ of mandamus. A denial of leave to file adjudicates nothing, decides no question of law, and is not a ruling on anything I said. Four of the five were entered in other matters against other respondents. Not one of the five touches the June 17 order under review.

So the exhibit set contributes no fact to any issue in this appeal. What it contributes is a *volume* — five denials, stacked, in the same brief in which you ask this Court to bar me from filing anything further. I am not going to characterize the purpose of that. I am going to note that you attached nothing from the proceeding you were writing about and five things from proceedings you were not, and let the panel do the arithmetic.

And then there is footnote 1, which I would have advised you to delete. It says: “While the People cannot verify the accuracy of all records provided by defendant, the records are cited to resolve facts defendant does not dispute by supplying them.” You put that sentence in a document you then certified under section 1-109. It is a written statement that you do not vouch for the accuracy of the record on which your only jurisdictional argument, your entire good-cause argument, and your request to silence a litigant all rest. You cannot disclaim the record and demand a dismissal on it in the same instrument. One of those two sentences has to go, and it is not going to be the one I wrote.

What follows takes the Objection paragraph by paragraph. For each I quote what you wrote, then the authority you invoked, in full. I am not paraphrasing your rules and I am not paraphrasing you, and where an authority cuts against me I quote that part too.

II. SIX REPRESENTATIONS, AND THE TEXT THAT DEFEATS EACH

¶	WHAT YOU CERTIFIED	WHAT THE AUTHORITY ACTUALLY SAYS
5, 10, 15	The notice of appeal “is not yet in effect, this Court lacks jurisdiction,” citing Ill. Sup. Ct. R. 303(a)(2).	Rule 303 is captioned “ Appeals from Final Judgments of the Circuit Court in CIVIL Cases. ” Its text provides that a premature notice “ becomes effective ” on entry of the disposing order. It is a savings clause. It provides for no dismissal.
5, 10, 15	Same — offered as the criminal jurisdictional rule.	Rule 612(b) is a closed list of the civil appeals rules made applicable to criminal appeals. Rule 303 is not on it. The governing rule is Rule 606(b) , which reaches only a motion “directed against the judgment,” gives striking to the trial court, and provides for a new notice within 30 days — not dismissal.
9	“The applicable Supreme Court Rule confirms the general requirement that errors must be ‘brought to the attention of the trial court.’ Ill. Sup. Ct. R. 615(a).”	Rule 615(a) is the plain-error rule . The eight words you quoted appear in it exactly once — inside the clause that excuses the omission. The rule states no requirement. See Part II.B.



¶	WHAT YOU CERTIFIED	WHAT THE AUTHORITY ACTUALLY SAYS
6, 15	"Defendant has not established good cause" — asserted four times as his burden.	Rule 609(a) , sentence one, governs an appeal from an order revoking probation and imposing imprisonment and imposes no such condition. "Good cause" appears in sentence two, which governs a motion to revoke a stay already entered . No party has filed one.
8, 11, 12	The People "are unable to respond in full ... in the absence of the underlying transcripts," and the incompleteness is resolved against the appellant under <i>Foutch</i> .	Both minute sheets you cited — SR-46 and SR-51 — name an ECR Specialist, Lake County Court Reporters , on their face. The proceedings were recorded. Rule 607(b) commands transcription on the filing of a notice of appeal and gives it to this defendant without charge . Rule 323(a) gave the People seven days to designate; that window closes August 4, 2026, and as of this letter nothing has been designated.
7	Defendant "has not factually or legally supported that the People in fact refused payment from his insurance company."	Exhibit E — Allstate to the Illinois Department of Insurance, July 20, 2026: counsel retained to pay, and " no one from the State Attorney's Office will give any information to Allstate or its counsel. "

A. Rule 303(a)(2) is the civil savings clause, and you cited it three times as a jurisdictional bar. This is the entire jurisdictional argument in your Objection. There is no alternative ground pleaded. Rule 303 sits in Article III, under a caption that names civil cases, and Rule 612(b) — the rule that decides which civil appeals rules cross over — does not list it. Across the whole of Rules 602 through 615, Rule 303 is referred to exactly once, at Rule 606(d), and then only for amending a notice of appeal under Rule 303(b)(5).

I will make your better argument for you, since you did not make it. Rule 606(b) — the criminal rule, the one that governs — provides that where a timely motion directed against the judgment is pending, a notice of appeal filed before its disposition "shall have no effect and shall be stricken." That language is adverse to me and I am quoting it to you rather than waiting to see whether you find it. It still does not get you to paragraph 15, for three reasons, each on the face of the rule. First, it reaches only a motion *directed against the judgment*; of the six instruments filed July 23 the strongest is a Rule 607 motion, and Rule 607(a) is triggered *upon the filing of a notice of appeal*, so a motion the rule makes contingent on the notice cannot be the motion that voids it. Second, the striking is done by the **trial** court, with transmission here in five days — it is not a dismissal by this Court, which is the only relief you asked for. Third, the same rule gives a **new notice within thirty days**, and Rule 606(c) gives leave, which I requested in the alternative before you filed. Rule 3.3(a)(2) obliges you to disclose controlling authority directly adverse to your position. The remedy half of Rule 606(b) is directly adverse to the dismissal you requested, and it appears nowhere in your nine pages — because the rule you cited instead was the one that saves the notice rather than the one that strikes it.

B. The Rule 615(a) sentence is the one I want you to look at twice. Here is the rule, whole, with nothing removed:

ILL. SUP. CT. R. 615(A), IN FULL

[Any error, defect, irregularity, or variance which does not affect substantial rights shall be disregarded. Plain errors or defects affecting substantial rights may be noticed although they were not brought to the attention of the trial court.]

You wrote that this rule "confirms the general requirement that errors must be 'brought to the attention of the trial court,'" and you put the eight words in quotation marks and cited the rule for them. The eight words are there. They are the object of the verb *excuses*. You extracted a clause from inside a savings provision and presented it to a reviewing court as the requirement the provision exists to waive. I can anticipate the answer, so I will take it now: that plain-error review is an *exception*, and an exception implies the general rule you described. It does — and the general rule lives in the forfeiture case law, which is exactly where your own *Chambliss* citation two sentences earlier found it. That is why the sentence is indefensible rather than merely wrong: you had a correct citation in hand, and then cited a second



authority for a proposition it does not contain, in words lifted from the clause that contradicts you. The Rule 615(a) sentence adds nothing to *Chambliss* except the appearance that a Supreme Court Rule says what it does not say. That is not a difference of emphasis and it is not a debatable reading. Rule 3.3(a)(1) forbids a knowingly false statement of law to a tribunal. Rule 8.4(c) reaches conduct involving dishonesty or misrepresentation. Whether you knew when you filed it, I cannot say and do not assert. You know now. That is what this letter is for, and it is the same function a Rule 3.3 notice performed two days ago as to counsel of record in the federal habeas proceeding.

C. You assigned me a burden the rule places on the party moving to revoke a stay. Rule 609(a)'s first sentence covers precisely this posture — an appeal from an order revoking or modifying the conditions attached to a sentence of probation and imposing a sentence of imprisonment — and provides that the sentence may be stayed, with or without bond, by a judge of the trial or reviewing court. It attaches no condition. The words “good cause” enter at the next sentence, which governs revocation of a stay already entered. You used the standard from sentence two four times and never quoted sentence one.

D. You cited *Banks* for the alternative and then declined the alternative. Your paragraph 8 concedes that “*Banks* noted alternatives for presenting a complete record in the absence of a court reporter.” Rule 612(b)(3) makes Rule 323(c) and (d) applicable to criminal appeals. The Rule 323(c) Proposed Report of Proceedings served on you separately this afternoon **is** that alternative. It went out today, inside the twenty-eight-day window Rule 323(c) allows, and it leaves a ruled blank column headed “The People’s proposed amendment, if any.” Rule 323(c) gives you fourteen days, to August 13, 2026. Separately, Rule 323(a) gave the People seven days from service of the July 28 docketing statement to designate additional portions of the proceedings for transcription. That period closes **August 4, 2026**. Your Objection designates nothing as of the hour this letter is sent. You cannot both invoke *Foutch*’s presumption against an incomplete record and let the two rules that would complete it lapse without a filing.

Foutch is a civil appeal from the denial of a motion to vacate, and its presumption rests on a premise that is absent here: that the appellant could have obtained the record and did not. In this posture Rule 607(b)(1) directs that the record be produced **without charge** to a defendant appealing “a hearing ... resulting in the revocation of or modification of the conditions of probation,” on the filing of a notice of appeal, as directed by this Court’s docketing order. And *Banks* is a decision of **this district**, cited by you, describing the mechanism you then declined to use. A presumption that exists to penalize a party who could have cured an omission does not transfer to a party who is being told he may not.

E. Paragraph 15 asks this Court for two things it cannot both do. It requests that the Court “dismiss defendant’s premature appeal,” and, in the next breath, that the motion be “denied” because good cause was not shown. Those are not alternative arguments; they are mutually exclusive dispositions. A court that lacks jurisdiction does not reach good cause, and a court that weighs good cause has necessarily kept the case. Whichever one the panel picks, it discards the other, and the order will have to say which — which is the one outcome your Objection was drafted to avoid. You cannot ask a reviewing court to hold simultaneously that it has no power over this matter and that, exercising that power, it rules against me.

III. THE TWO DOCUMENTS YOU READ, AND WHAT IS ON THE SAME PAGE YOU DID NOT TELL THE PANEL

Everything above is a dispute about what rules mean, and a lawyer is entitled to lose one of those without consequence. This part is not that. You cited both minute sheets by supporting-record page, which means you had them open. You told the panel what each one showed. Below is what else is printed on the same sheet, in the same block of text, within four lines of the language you quoted. (Exhibits A and B.)



SHEET	WHAT YOU TOLD THE COURT IT SHOWS	WHAT ELSE IS PRINTED ON IT
May 28, 2026 SR-46 · captioned “Arraignment On Petition To Revoke”	“A court minutes sheet indicates a member of Adult Probation Services was present on May 28, 2026.” (§ 4)	“ ECR Specialist, Lake County Court Reporters. ” Present in Court: one probation officer. No defendant. No defense counsel. Nature of Proceedings, in its entirety: “Case Called” and “ Issue Warrant. ” The warrant it produced commands custody for a “ technical violation ” and bears the notation “ PD APPOINTED. ”
June 17, 2026 SR-51, SR-53 · captioned “Status”	“[R]eflect defendant’s presence by video, and the circuit court granting an oral motion to lift the stay on his jail sentence.” (§ 4)	“ ECR Specialist, Lake County Court Reporters. ” Also printed: “ Public Defender Discharged ” and “ WARRANT WILL NOT BE QUASHED. ” No evidence, no witness, no stipulation, no admission, no finding appears anywhere on the sheet. The written order is one sentence.

Your paragraph 8 calls it an “extrapolation” for me to say of the June 17 sheet that there was “[n]o evidence, no witness, no stipulation, no admission, no finding.” It is not an extrapolation. It is a reading of the document. You read the same document four paragraphs earlier and extracted from it the two facts that helped you. A minute sheet is either a record of what occurred or it is not; you cannot cite it as proof of presence and dismiss it as insufficient proof of absence in the same brief.

The same two sheets answer paragraph 11, and they answer it against you. You told the panel the People “are unable to respond in full to defendant’s claims in the absence of the underlying transcripts.” Both sheets name an **ECR Specialist of Lake County Court Reporters** in the appearance block. The proceedings were electronically recorded. The audio exists, in the custody of a county office, for Courtroom 611 on May 28, 2026 at 9:00 a.m. and June 17, 2026 at 9:00 a.m. What does not exist is a transcript, and Rule 607(b) says whose job that is: court reporting personnel, on the filing of the notice of appeal, “as directed by the appellate court docketing order,” without charge to a defendant in exactly this posture. You are asking a reviewing court to resolve doubts against me because a document has not been produced that a rule obliges the State’s own courthouse to produce, that you had seven days to designate, and that you did not designate.

IV. EVIDENCE, STATED PRECISELY AND WITHOUT ADJECTIVES

I make no allegation that any person destroyed anything. I make four factual statements, each with a document behind it, and I ask you to preserve the systems that answer them.

- 1 The recordings.** Electronic court recording existed for both proceedings, on the face of the sheets you cited. No transcript has been ordered, prepared, or filed. No Rule 323(a) designation has been served by the People. The Rule 323(a) window closes August 4, 2026. (Exhibits A, B.)
- 2 The exculpatory clearance.** The supervising probation office cleared the amphetamine screen in writing on December 10, 2025 — “it is all negative in my eyes because I know you are still taking the Adderall” — five months before an assistant State’s Attorney personally swore that I tested positive for an “illegal substance.” Your Objection recites the allegation at paragraph 4 and never mentions the clearance. Rule 3.8(d) is a disclosure obligation, not a discovery obligation, and it does not end at sentencing. (Exhibits C, F.)
- 3 The insurer record.** Paragraph 7 states that I have not supported the assertion that payment was refused. Exhibit E is a regulated insurer’s written response to a state agency saying it retained counsel to pay and that no one in the State’s Attorney’s Office would speak to them. Paragraph 7(a) of the Financial Sentencing Order — “Restitution” — is blank. (Exhibits D, E.)
- 4 The docket entry and the mailbox.** A file-stamped verified omnibus motion appears on the public case-action page for June 15, 2026 typed as “**Correspondence.**” A motion docketed as a letter is a motion no judge is ever asked to rule on. Separately, fderosa@lakecountyyil.gov generated a Microsoft automatic reply **101 seconds** after receiving a preservation demand on June 23, 2026 — DKIM, SPF and DMARC all passing, originating organization lakecountyyil.gov — then failed directory resolution on July 13 with **550 5.1.10 RESOLVER.ADR.RecipientNotFound** and was rejected outright



on July 29 with **550 5.4.1 Recipient address rejected**. I do not assert who caused that or why. I assert that it happened, that the record proves it, and that the tenant lifecycle and retention logs that answer it are in Lake County's possession. Your own Exhibits 2 and 3 are Supreme Court orders whose service lists name **"Francis Paul DeRosa."** You authenticated his involvement yourself. (Exhibits G, H.)

V. PARAGRAPH 13 — THE REQUEST TO BAR A PRO SE LITIGANT FROM FILING

Paragraph 13 asks "that defendant be barred from further supplement or otherwise asserting additional matters after this objection is filed." You asked for a prior restraint on a self-represented litigant's access to a reviewing court, in a paragraph, without a motion, without notice, without a Rule 375 predicate, and without any opportunity to be heard on it — against a person who is under an outstanding custodial warrant and due in the circuit court on August 6, 2026. A filing restriction is an extraordinary remedy that requires notice and an opportunity to respond, and it must be narrowly drawn. Buried in an objection is not how it is sought. And there is a structural consequence you may not have intended: a paper that asks for affirmative relief is a motion under Rule 361(a), which is precisely what gives me a response of right under Rule 361(b)(3). You asked for two forms of relief in your Objection. Both of them opened the door you were trying to close.

VI. LITIGATION HOLD — EFFECTIVE ON TRANSMISSION OF THIS LETTER

Three federal actions and one state appeal are pending; the duty to preserve is not prospective and is not discretionary. This is a formal demand that you, the Office of the State's Attorneys Appellate Prosecutor, and the Office of the Lake County State's Attorney immediately suspend every auto-deletion, retention-expiry, journaling-purge, and device-reimaging process touching the categories below, and issue a written hold to each custodian named. Preserve in place. Do not migrate, convert, or consolidate.

- 1 **Custodians.** Max C. Boose; Edward R. Psenicka; Sandra J. Lorigan; the shared mailbox *2nddistrict.eserve@ilsaap.org*; the Second District office of the State's Attorneys Appellate Prosecutor, 2032 Larkin Avenue, Elgin. And at Lake County: Eric F. Rinehart; Nicholas Shepherd; Francis Paul DeRosa; Gregory R. Ticsay; Bailey Clare Russell; Marissa Cervantes and Lake County Adult Probation Services; Lake County Court Reporters; the Office of the Circuit Clerk; and any court services representative who communicated with chambers about my filings, including the communication your own footnote 2 describes.
- 2 **The Objection itself.** Every draft, redline, comment, and version of the document filed today; the research file behind the Rule 303(a)(2), Rule 615(a), and Rule 609(a) citations; all internal correspondence about it; the file transmitted from the Lake County State's Attorney to your office; and the native file with metadata intact.
- 3 **The recordings.** All electronic court recording audio, backup audio, logs, indexes, annotations and chain-of-custody records for Courtroom 611, Nineteenth Judicial Circuit, for **May 28, 2026 at 9:00 a.m.** and **June 17, 2026 at 9:00 a.m.**, together with every access, export, copy, or transcription-request log touching them, and the retention schedule that governs them.
- 4 **Electronic mail and messaging.** Mailboxes, archives, recoverable-items folders, retention labels and policies, eDiscovery/Purview holds, transport rules, forwarding rules, and message-trace logs in both the *ilsaap.org* and *lakecountyil.gov* Microsoft 365 tenants, for all custodians above, for the period January 1, 2025 to the present. Preserve Teams messages, SMS and any messaging on personally owned devices used for public business.
- 5 **The DeRosa directory object.** All Entra ID / Azure AD lifecycle records for *fderosa@lakecountyil.gov*: creation, license assignment, mailbox conversion, soft-delete, hard-delete, alias and proxy-address changes, forwarding, litigation-hold status, and every administrative action log entry from June 1, 2026 forward, together with the mailbox contents in whatever state they now exist.



- 6 **The e-filing and docketing systems.** Odyssey / eFileIL / Tyler envelope records, submission and acceptance events, clerk annotations, document-type assignments and every change to them, rejection notices, and the full audit trail for case 23 CF 1146 — specifically including the entry typed “**Correspondence**” on June 15, 2026 and the identity of the user who typed it; plus the JournalTech and public portal systems and their outage records.
- 7 **The probation and screening file.** The complete Lake County and Cook County supervision files; the April 8, 2026 violation memorandum and every draft; the laboratory record, requisition, and chain of custody for the specimen variously dated 11/10/2025 and 11/20/25; and all communications with Cook County Adult Probation concerning the December 2025 clearance.
- 8 **Backups.** All backup media, snapshots, journals, and disaster-recovery copies containing any of the above, notwithstanding any ordinary rotation or overwrite schedule.

The obligation is not merely a civil-discovery one. The State Records Act, 5 ILCS 160/1 *et seq.*, and the Local Records Act, 50 ILCS 205/1 *et seq.*, forbid the disposal of public records outside an approved schedule. Section 32-8 of the Criminal Code, 720 ILCS 5/32-8, reaches the knowing alteration, destruction, or concealment of a public record without lawful authority; section 31-4 reaches the destruction or concealment of evidence with intent to obstruct. In the federal actions, Rule 37(e) of the Federal Rules of Civil Procedure supplies the remedy where electronically stored information that should have been preserved is lost, up to and including an instruction that the lost information was unfavorable — and Illinois recognizes the tort where a duty to preserve was voluntarily or otherwise assumed. *Boyd v. Travelers Ins. Co.*, 166 Ill. 2d 188 (1995); *Shimanovsky v. General Motors Corp.*, 181 Ill. 2d 112 (1998). I ask for **written confirmation by 5:00 p.m. Tuesday, August 4, 2026** that the hold has issued and identifying, by title, the person responsible for it.

VII. DEMAND FOR WITHDRAWAL — BY PARAGRAPH, BY 5:00 P.M. TUESDAY, AUGUST 4, 2026

Rule 3.3(a)(1) requires a lawyer who has made a false statement of material fact or law to a tribunal to correct it. Rule 3.3(c) makes that duty continue to the conclusion of the proceeding and provides that it applies even if compliance requires disclosure of otherwise protected information. What follows is the correction, itemized. Each item can be satisfied by a one-paragraph supplemental filing; none of them requires you to abandon a defense the record supports.

- 1 **Withdraw the Rule 303(a)(2) argument** at paragraphs 5, 10 and 15, or file a corrected citation to Rule 606(b) that states, in the same sentence, the remedy Rule 606(b) prescribes and the availability of Rule 606(c) leave.
- 2 **Withdraw the second sentence of paragraph 9**, or reproduce Rule 615(a) in full so the panel can see that the words you quoted sit inside the clause that excuses the omission.
- 3 **Withdraw the “good cause” assignment** at paragraphs 6 and 15, or identify by sentence which part of Rule 609(a) you contend imposes it on an appellant rather than on a movant to revoke an existing stay.
- 4 **Withdraw the request at paragraph 13** that I be barred from further filing.
- 5 **Correct paragraph 7**, or state in writing that you have now reviewed Exhibit E and maintain the representation notwithstanding it.
- 6 **Disclose Exhibit C to the panel** under Rule 3.8(d). If the People rely on the revocation petition’s drug allegation in any filing in this appeal, the supervising office’s written clearance of that same screen goes in front of the tribunal with it.
- 7 **Serve a Rule 323(a) designation** of the May 28 and June 17, 2026 electronic recordings by August 4, 2026, or state on the record that the People decline to designate them.
- 8 **State the People’s position under Rule 323(c) and (d)** as to the proposed report served on you today by August 13, 2026 — amendment, stipulation, or nothing. All three are acceptable answers. Silence is one of them, and it will be reported as silence, not as agreement.
- 9 **Confirm the litigation hold** in Part VI in writing by 5:00 p.m. Tuesday, August 4, 2026.

VIII. THE DISCIPLINARY REFERRAL — WHAT I KNOW, AND WHY IT IS NOT AN OFFER



I would rather show you the weak part of this myself than let you find it, so this section begins with the part that does not work. I have been through the Commission's process. I hold four file numbers already. All four are closed. Both closure letters are attached as Exhibit I, unedited, including the paragraphs that are bad for me.

ARDC FILE	RESPONDENT	DISPOSITION
2026IN03189	Bailey Clare Russell	Closed at intake, June 18, 2026, without investigation.
2026IN03190	Nicholas Shepherd, Assistant State's Attorney	Closed at intake, June 18, 2026, without investigation.
2026IN03266	Francis Paul De Rosa, Assistant State's Attorney	Closed at intake, July 1, 2026, without investigation.
2026IN03281	Gregory R. Ticsay	Closed at intake, July 1, 2026, without investigation.

So I know precisely what will happen when I file the fifth. A file will be docketed. It will be assigned a number in the same series. It will be reviewed in the Intake Division at 130 East Randolph Drive, and within a few weeks I will receive a letter on the Commission's letterhead containing this sentence, which I have now received twice:

ARDC TO EHAB ALLABABIDI — JUNE 18, 2026 AND AGAIN JULY 1, 2026 (EXHIBIT I)

*[Your complaint regarding Assistant States Attorney ... are essentially claims of prosecutorial misconduct. Such claims are appropriately addressed and resolved in the courts through motions, appeals and other legal actions. Therefore, in most instances, **this Commission will not act on such claims unless a court has first found that a prosecutor acted improperly.**]*

I am telling you the result of step one before I take it. I expect the fifth file to close exactly as the first four did, and I am not going to pretend otherwise in a letter whose only asset is that everything in it can be checked. That is not a reason to skip the step. The file number and the date are the product; the closure letter is a receipt. What a docketed number buys is that the next document I send the Administrator is not an accusation from a stranger — it is a supplement to an existing file, opened before the event it reports. The Commission has already told me, twice and in writing, what that event is:

THE ADMINISTRATOR'S STANDING INVITATION — FINAL SUBSTANTIVE PARAGRAPH OF BOTH LETTERS (EXHIBIT I)

*[If, in the future, **any court finds that the State ... acted improperly in connection with your case, we invite you to send us a copy of the court's decision. At that time, we will determine whether further action by this office may be warranted.**]*

That is not my characterization of Commission practice. It is the Commission's written instruction to me, and it is attached. It converts a disciplinary referral from an argument into a two-step procedure whose second step is controlled entirely by what a court writes down.

One detail from Exhibit I, offered as evidence of my own realism rather than as a complaint. The July 1 letter analyzes my claims against "Assistant States Attorney Francis Ticsay" — a person who does not exist. It merged two lawyers into one. I mention it because it tells you precisely how much individualized attention an intake file receives, and because it is the reason I am not relying on intake for anything. I am relying on the docket number it produces and on the court that has not ruled yet. Here is the sequence, in order:

- 1 A request for investigation naming you, Mr. Psenicka under Rule 5.1(b) and (c), and Mr. Rinehart under Rule 5.1(a), is filed with the Administrator, attaching this letter, your Objection, and Exhibits A through I. Supreme Court Rule 775 immunizes that communication from civil liability. Rule 766 keeps the file confidential until a complaint is voted and filed with the Hearing Board — which means the first step is quiet, and quiet is fine.
- 2 The file is docketed, numbered, and in all probability closed, for the reason the Commission has already given me twice.



- 3 The same materials are filed of record in the pending federal actions, where the conduct is squarely at issue and where the tribunal is not confined to reviewing a lawyer's ethics in the abstract. The docketed date of your knowledge — today — is what makes anything filed after it a knowing act rather than an inadvertent one.
- 4 When a court makes a finding, the finding is sent to the Administrator under the same file number, with the Commission's own invitation stapled to the front of it. At that point the file is no longer a self-represented litigant's assertion. It is a judicial determination, and it is the single event the Administrator has identified as the one that warrants further action.
- 5 I will not be the only person with an obligation at that point. Rule 8.3(a) obliges every lawyer who knows of a violation raising a substantial question as to honesty or fitness to inform the Commission. Rule 2.15 of the Illinois Code of Judicial Conduct imposes the same duty on any judge who receives information indicating a substantial likelihood of such a violation. Those duties are not mine to invoke or to waive.

None of this is an offer. There is nothing in this letter to trade and no consideration proposed. I am not offering to withhold a referral in exchange for the withdrawal demanded in Part VII, and you should not read one into it — bargaining over whether a false statement of law stays in front of a reviewing court would be its own violation, for both of us. The referral is being prepared. What Part VII changes is not whether it is filed but what it says. There will be a paragraph in it describing what you did after you were given the rule texts in writing. Right now that paragraph is unwritten. By 5:00 p.m. Tuesday, August 4, 2026 it will say one of two things, and you are the only person who decides which.

One more thing, to close the last ambiguity. If you do withdraw or correct the six representations, **I will say so to the Administrator, in the referral itself, in the same paragraph.** Not as a concession extracted from you — nothing here is extracted — but because Rule 3.3 treats a timely correction as the remedial measure the rule exists to produce, and because a submission that omitted it would be the same species of document I am writing to you about. You do not have to take that on faith. You will be able to read it.

IX. WHAT HAPPENS ON AUGUST 5, WHICHEVER WAY YOU DECIDE

Three things occur without a ruling, without my leave, and without yours. I set them out because a recipient reading only for exposure tends to conclude that inaction is free, and here it is not cost-free; it is simply quieter.

- 1 **The Rule 323(a) window closes August 4, 2026.** If nothing is designated, the record of this appeal will show that the People invoked the absence of a transcript on July 30 and let the mechanism for producing one expire five days later. That is not an argument I have to win. It is a date and an absence, and both are already fixed.
- 2 **This letter is filed.** Of record in this appeal, and in 1:26-cv-06738 and 1:26-cv-01077. From the moment it is docketed, the question in each of those forums stops being what the rules say — that is settled by their text — and becomes what you did in the five days after you were handed them.
- 3 **The referral and the FOIA requests go out.** Neither is contingent on your answer, neither needs anyone's permission, and the FOIA requests are directed at the drafting file behind the four citations discussed in Part II. If the research supporting them exists, it will help you. If it does not exist, that is also an answer, and it is one I did not have to ask you for.

The single variable in the next five days is your answer, and the only place it changes anything is in the sentence that describes it.

X. THE FEDERAL RECORD, AND WHY IT IS THE OPERATIVE FORUM

The reason the disciplinary track is second and not first is that the federal track is where a finding actually gets made. Three actions are pending, and the conduct described in this letter is within the subject matter of all three.



CASE	COURT / POSTURE
1:26-cv-06738	<i>Allababidi v. Shepherd, et al.</i> — 42 U.S.C. § 1983, N.D. Ill., Hon. Matthew F. Kennelly. Assistant State's Attorneys are named in their individual capacities on the ground that personally attesting to facts is "the function of the witness, not of the lawyer." <i>Kalina v. Fletcher</i> , 522 U.S. 118, 129–31 (1997).
1:26-cv-01077	<i>Allababidi v. Junkin, et al.</i> — habeas corpus, N.D. Ill., Hon. John Robert Blakey. Rule 4 review passed April 13, 2026. Respondents' response was due August 10, 2026 on a motion representing that "no record was prepared for petitioner's direct appeal." Compare your paragraph 11.
1:25-cv-15800	<i>Allababidi v. Advocate Health and Hospitals Corp., et al.</i> — civil RICO, N.D. Ill., Hon. Jorge L. Alonso.
2-26-0352	This appeal. Response and Rule 323(c) proposed report filed today; Rule 323(a) designation window closes August 4, 2026; Rule 323(c) amendments due August 13, 2026.

Set the habeas row of that table against your paragraph 11. The State has already told a federal court that no record was prepared for the direct appeal. You have now told a state reviewing court that the absence of that record defeats me. Those two positions are held by the same sovereign about the same record, and I will be placing them side by side. Federal Rule of Civil Procedure 11(b)(3), 28 U.S.C. § 1927, and the disciplinary provisions of the Local Rules of the Northern District of Illinois, LR 83.25 *et seq.*, each supply a mechanism, and each of them produces the one thing the Commission says it is waiting for: a court's written finding. When it issues, it goes on the federal record first and to the Administrator second, and the ARDC file number opened this month is what it lands in.

XI. WHAT THIS LETTER DELIBERATELY DOES NOT DO

I want the limits on the record too, because a demand that overreaches is a demand that gets discounted, and because you are entitled to know the boundaries of what is being asserted against you.

- 1 I do not assert that you may not oppose my motion.** The People are entitled to counsel and to every position the record supports. Nothing in Part VII asks you to concede the stay, the merits, or anything else. It asks you to stop citing four rules for propositions their text contradicts.
- 2 I do not threaten to name you as a defendant for filing a brief.** I am aware that threatening opposing counsel with suit over a responsive pleading is the one move that converts my problem into a sanctions motion against me. I am not making it. The leverage in this letter is the documented date of your knowledge and nothing else.
- 3 I do not allege that anyone destroyed evidence.** Part IV states transport facts and docket facts. The limiting sentence in Exhibit H is deliberate and I adopt it: those records establish a change in delivery state; they do not identify the cause, the responsible person, or whether contents were retained. The hold in Part VI exists so that the records which *can* answer that question survive to answer it.
- 4 I do not assert that you personally knew, before today, that Rule 615(a) is the plain-error rule.** Every provision in Part VIII turns on the word *knowingly*. Whatever the state of your knowledge when you signed the verification page, it is fixed as of the transmission of this letter, and the rule texts are reproduced above so that no one has to take my word for any of them.

XII. SUPERVISORY RESPONSIBILITY

This letter is copied to Deputy Director Psenicka and to State's Attorney Rinehart because both appear on the signature block of the instrument at issue and because Rule 5.1 reaches them independently. Rule 5.1(a) places on a lawyer with managerial authority the duty to make reasonable efforts to ensure the office has measures giving reasonable assurance of conformity to the Rules. Rule 5.1(b) places on a directly supervising lawyer the duty to make reasonable efforts to ensure the supervised lawyer conforms. Rule 5.1(c)(2) makes a supervising lawyer responsible for a violation he knows of at a time when its consequences can be avoided or mitigated and fails to take reasonable remedial action. As of the transmission of this letter, that time has begun to run for all three of you, and it



closes on 5:00 p.m. Tuesday, August 4, 2026.

RESPOND IN WRITING BY 5:00 P.M. TUESDAY, AUGUST 4, 2026

Nothing in this letter asks the People to abandon a defense. It asks for four things and they are all verifiable in a paragraph each: written confirmation that the litigation hold in Part VI has issued; withdrawal or correction of the six representations itemized in Part VII; a Rule 323(a) designation of the May 28 and June 17 recordings or a statement declining to designate them; and the People's position on the Rule 323(c) proposed report served today. If I receive no reply by that hour I will report that to the Court, and to the Commission, as exactly what it is — no response — and not as agreement. Address the reply to defcon5ready@gmail.com and ehabhilfiger@gmail.com, the two addresses your own proof of service names.

XIII. RESERVATION OF RIGHTS

- 1 This letter, its transmission metadata, and the fact and time of its delivery will be offered as evidence of notice in each proceeding listed in Part X, and will be filed of record in this appeal.
- 2 A request for investigation as described in Part VIII will be submitted to the Administrator of the Attorney Registration and Disciplinary Commission, and supplemented on the occurrence of any judicial finding, under the procedure the Commission itself described in Exhibit I.
- 3 A request under the Freedom of Information Act, 5 ILCS 140/1 *et seq.*, will be directed to the Office of the State's Attorneys Appellate Prosecutor and to Lake County for the records enumerated in Part VI that are not exempt, with review by the Public Access Counselor if denied.
- 4 I reserve every remedy available under Rule 375, Rule 137, Rule 11 of the Federal Rules of Civil Procedure, 28 U.S.C. § 1927, and the common law of spoliation, and I waive none by sending this.

No conclusion appears in this letter that is not preceded by the document establishing it, and no rule appears that is not quoted in the words the Supreme Court used, including the words that cut against me. You are welcome to check every one; that is why they are attached rather than described. Strip away the thirteen parts and the question in front of you is narrow and it is entirely yours: whether four citations stay in a document filed in your name in the Second District, now that you have read what the four rules say.

I have no way to make you answer and I am not pretending to have one. I can only make the choice a documented one, on a date, with the texts in front of you — and that part is finished as of the transmission of this letter.

Nothing here requires your agreement. It requires your answer, in writing, by Tuesday.

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



ENCLOSURE REGISTER

EXHIBIT INDEX

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

EX.	RECORD	BATES / SOURCE
A	May 28, 2026 — minute sheet and the warrant it produced The sheet your Objection cites at SR-46. It names an ECR Specialist, lists no defendant and no defense counsel, and disposes of the call in two words: "Issue Warrant."	BOOSE-000001
B	June 17, 2026 — minute sheet, the one-sentence order, and the nunc pro tunc discharge The sheet your Objection cites at SR-51 and SR-53. It names an ECR Specialist, records "WARRANT WILL NOT BE QUASHED," and activates 180 days on an oral motion.	BOOSE-000004
C	Cook County Adult Probation — written clearance of the amphetamine screen December 8 and 10, 2025 — the screen adjudicated compliant by the supervising office five months before an assistant State's Attorney swore it was an illegal substance.	BOOSE-000007
D	Financial Sentencing Order — paragraph 7(a), Restitution: blank September 8, 2025. No restitution figure was carried into the financial judgment, and the installment obligation does not mature until approximately December 8, 2027.	BOOSE-000010
E	Insurer record — retained counsel to pay, and "no one will respond or cooperate" Allstate Fire and Casualty to the Illinois Department of Insurance, Complaint No. 01124092, July 20, 2026 — the document your paragraph 7 says is unsupported.	BOOSE-000012
F	April 8, 2026 Probation Violation Memorandum — the date that does not match the sworn petition This memorandum dates the screen 11/20/25. The petition sworn May 14, 2026 — your own record cite, SR-41 — dates the same screen 11/10/2025. Neither mentions Exhibit C.	BOOSE-000015
G	Circuit court portal case-action page — the June 15, 2026 entry typed "Correspondence" Captured June 19, 2026. A file-stamped verified omnibus motion appears on the public docket as "Correspondence," between the May 28 warrant and the June 17 order.	BOOSE-000016
H	Francis DeRosa e-mail address — transport metadata and recipient-status record Bates DMTR-000001 to DMTR-000007. The mailbox accepted a preservation demand on June 23, 2026 and stopped resolving in the county's own directory twenty-one days later.	BOOSE-000017
I	ARDC closure letters of June 18 and July 1, 2026 — and the Administrator's standing invitation Nos. 2026IN03189, 2026IN03190, 2026IN03266 and 2026IN03281. Read the last substantive paragraph of each: it is why Part VIII of this letter is arithmetic rather than rhetoric.	BOOSE-000024



EXHIBIT A

May 28, 2026 — minute sheet and the warrant it produced

BOOSE-000001

The sheet your Objection cites at SR-46. It names an ECR Specialist, lists no defendant and no defense counsel, and disposes of the call in two words: "Issue Warrant."



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



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 B

**June 17, 2026 — minute sheet, the one-sentence order, and
the nunc pro tunc discharge**

BOOSE-000004

*The sheet your Objection cites at SR-51 and SR-53. It names an ECR Specialist, records
"WARRANT WILL NOT BE QUASHED," and activates 180 days on an oral motion.*



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

FILED

6/18/2026 10:48 A

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

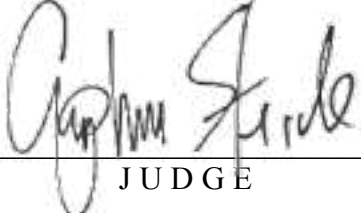
ORDER

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



JUDGE

FILED

6/17/2026 2:50 PM

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.)

Ehab Allababidi)

General No. 23CF1146

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 C

**Cook County Adult Probation — written clearance of the
amphetamine screen**

BOOSE-000007

*December 8 and 10, 2025 — the screen adjudicated compliant by the supervising office five months
before an assistant State's Attorney swore it was an illegal substance.*



Ehab Hilfiger <defcon5ready@gmail.com>

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 <defcon5ready@gmail.com>

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

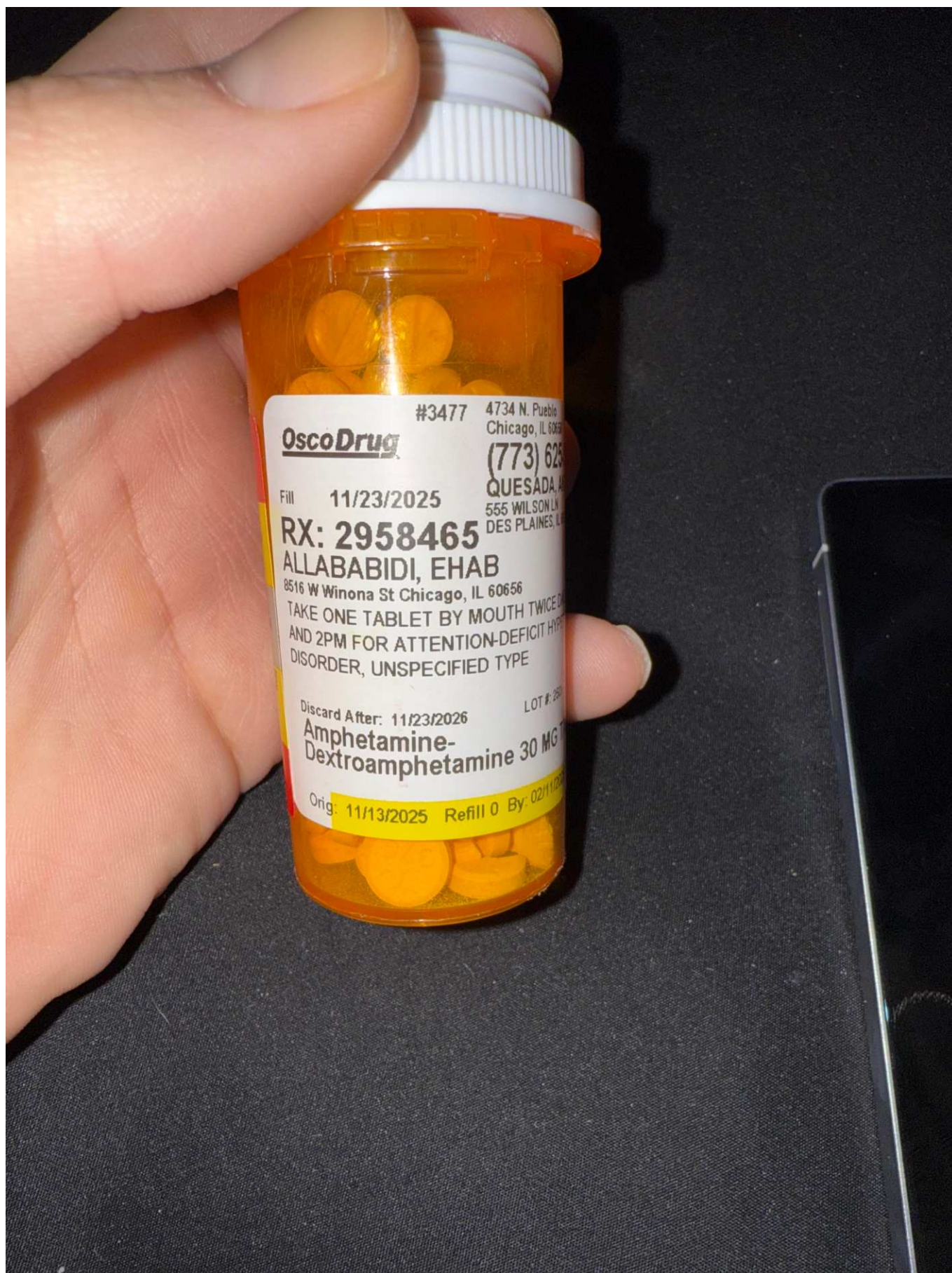
adison b. weeks



From: Ehab Hilfiger <defcon5ready@gmail.com>**Sent:** Wednesday, December 10, 2025 1:40 PM**To:** Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov>**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@cookcountylil.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

adison b. weeks



From: Ehab Hilfiger <defcon5ready@gmail.com>

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

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

Subject: Re: Prescription Verification & Compliance Letter

External Message Disclaimer

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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.



EXHIBIT D

**Financial Sentencing Order — paragraph 7(a), Restitution:
blank**

BOOSE-000010

September 8, 2025. No restitution figure was carried into the financial judgment, and the installment obligation does not mature until approximately December 8, 2027.

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 \$

_____ f.	☐	Street Value – Drug-related offense, possession/delivery (705 ILCS 135/15-70(6))	\$	_____
_____ g.	☐	Street Value – Methamphetamine, possession/manufacture (705 ILCS 135/15-70(7))	\$	_____
_____ h.	☐	Order of protection violation (705 ILCS 135/15-70(8))	\$200 per conviction	\$ _____
_____ i.	☐	Order of protection violation (705 ILCS 135/15-70(9))	\$ 25 per violation	\$ _____
_____ j.	☐	State's Attorney petty or business offense (705 ILCS 135/15-70(10)(A))	\$ 4	\$ _____
_____ k.	☒	State's Attorney conservation or traffic offense (705 ILCS 135/15-70(10)(B))	\$ 2	\$ <u>2</u>
_____ l.	☐	Speeding in a construction zone (705 ILCS 135/15-70(11))		
	☐	Interstate Highway	☐	County
_____ m.	☐	Supervision disposition under Vehicle Code (705 ILCS 135/15-70(12))	\$ 0.50	\$ _____
_____ n.	☐	Guilty plea or no contest, specified offense against family member		
	☐	Sentencing offense is Sexual Assault (705 ILCS 135/15-70(13))	\$ 200	\$ _____
_____ o.	☐	EMS response reimbursement, vehicle/snowmobile/boat violation (DUI/OUI) (705 ILCS 135/15-70(14))	Max. Amt. is \$1,000	\$ _____
_____ p.	☐	EMS response reimbursement, controlled substances violation (705 ILCS 135/15-70(15))	\$1,000	\$ _____
_____ 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	\$ _____
_____ 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		
_____ s.	☐	Weapons Violation, Trauma Center Fund (705 ILCS 135/15-70(18))	\$100 per conviction	\$ _____
_____ t.	☐	Scott's Law (705 ILCS 135/15-70(19))	☐ State Police ☐ County	\$ 250 \$ _____
		Subtotal – Conditional Assessment Amount: \$ _____		
		TOTAL CRIMINAL AND CONDITIONAL ASSESSMENTS: \$ <u>551.00</u>		

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:

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

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

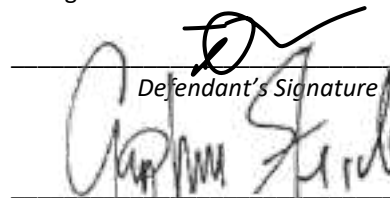
☐ **SEE EXHIBIT A**

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

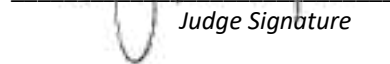

 Judge Signature



EXHIBIT E

**Insurer record — retained counsel to pay, and “no one will
respond or cooperate”**

BOOSE-000012

*Allstate Fire and Casualty to the Illinois Department of Insurance, Complaint No. 01124092, July 20,
2026 — the document your paragraph 7 says is unsupported.*

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.

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.



EXHIBIT F

**April 8, 2026 Probation Violation Memorandum — the date
that does not match the sworn petition**

BOOSE-000015

*This memorandum dates the screen 11/20/25. The petition sworn May 14, 2026 — your own record
cite, SR-41 — dates the same screen 11/10/2025. Neither mentions Exhibit C.*

ADMINISTRATIVE OFFICE OF THE NINETEENTH JUDICIAL CIRCUIT

Division of Adult Probation Services

FILED

STATE OF ILLINOIS
JUL 17 2025



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

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 G****Circuit court portal case-action page — the June 15, 2026
entry typed “Correspondence”**

BOOSE-000016

*Captured June 19, 2026. A file-stamped verified omnibus motion appears on the public docket as
“Correspondence,” between the May 28 warrant and the June 17 order.*



Circuit Court of the Nineteenth Judicial Circuit

Lake County, Illinois

23CF00001146 Warrant/Attach.After Sentence/Jdgmt

PEOPLE VS ALLABABIDI

Criminal/Traffic: Criminal Felony - Filed: 06/14/2023

[Parties](#)[Charges/Dispositions/Sentences](#)[Court Events](#)[Documents Filed](#)[Financial](#)

Documents-Invite

[Add Proposed Order](#)

▼ Documents

Filed Date	Document Type	Document Action
06/18/2026	Order	Filed View
06/18/2026	Minute Record	View
06/17/2026	Order	Filed View
06/15/2026	Correspondence	View
05/28/2026	Warrant WT	Filed eMail View
05/28/2026	Minute Record	View
05/14/2026	Petition to Revoke	Filed View
05/14/2026	Notice Of Motion	Filed View
04/08/2026	Memorandum Probation Violation	Filed View
03/10/2026	Minute Record	View
01/26/2026	Minute Record	View
12/11/2025	Minute Record	View
12/08/2025	Petition RELIEF	View
12/08/2025	Motion combined motion	View
11/25/2025	Petition RELIEF	View
11/25/2025	Mail EXHIBIT PACKET	View



EXHIBIT H

**Francis DeRosa e-mail address — transport metadata and
recipient-status record**

BOOSE-000017

*Bates DMTR-000001 to DMTR-000007. The mailbox accepted a preservation demand on June 23,
2026 and stopped resolving in the county's own directory twenty-one days later.*

**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

**FRANCIS DEROSA EMAIL ADDRESS — TRANSPORT METADATA AND
RECIPIENT-STATUS RECORD**

Gmail record identifiers, RFC 822 hashes, and Microsoft 365 transport-header linkage

Purpose. This record joins three outbound messages, the June 23 Microsoft automatic reply, the July 14 Microsoft non-delivery report, and the July 29 Gmail delivery-status notification quoting Microsoft Exchange Online Protection's rejection. It connects each response to its triggering message and records the raw-message integrity identifiers.

Address tested	fderosa@lakecountyil.gov
Acquisition	Connected Gmail account; raw RFC 822 MIME requested and reviewed July 29, 2026.
Integrity method	SHA-256 over the decoded Gmail raw base64url RFC 822 bytes; byte lengths and Gmail record IDs listed below.
Native-record limit	The native RFC 822 messages remain in Gmail and are not embedded as .eml files. The hashes identify the raw records retrieved during this review.

Finding and boundary. On June 23, 2026 Lake County's Microsoft environment generated an automatic reply associated with fderosa@lakecountyil.gov 101 seconds after a message copying that address. The reply's In-Reply-To and Exchange parent-message identifiers name the outgoing message exactly. On July 13 the same address failed directory resolution with **550 5.1.10 RESOLVER.ADR.RecipientNotFound**; on July 29 Lake County's Microsoft edge rejected it with **550 5.4.1 Recipient address rejected**. These records establish a change in delivery or recipient-resolution state. **They do not, by themselves, identify the administrative cause, the responsible person, the exact mailbox or recipient-object type, or whether historical mailbox contents were retained, moved, converted, or deleted.** Those questions require Lake County's tenant lifecycle, retention, and audit records.

Six-event chronology

Event	Chicago / UTC	Record and result
1	Jun. 23, 2026 1:13:14 PM CDT 18:13:14 UTC	Outgoing preservation email; exact address in CC.
2	Jun. 23, 2026 1:14:55 PM CDT 18:14:55 UTC	Lake County Microsoft auto-reply from exact address, 101 seconds later .
3	Jul. 13, 2026 8:09:19 PM CDT Jul. 14 01:09:19 UTC	Outgoing demand; exact address again in CC.
4	Jul. 13, 2026 8:09:38 PM CDT Jul. 14 01:09:38 UTC	Lake County Microsoft NDR, 19 seconds later : 550 5.1.10 RecipientNotFound.
5	Jul. 29, 2026 7:13:50 PM CDT Jul. 30 00:13:50 UTC	Outgoing warrant/FOIA notice; CC displays the address as FDeRosa@lakecountyil.gov.
6	Jul. 29, 2026 7:14:05 PM CDT Jul. 30 00:14:05 UTC	Gmail DSN quotes Lake County's Microsoft edge, 15 seconds later : 550 5.4.1 Recipient address rejected.

The two rejection codes are distinct but substantively aligned

Date / code	Where the rejection appears	Recorded meaning
Jul. 14 550 5.1.10	Lake County/Microsoft NDR from No-Reply@lakecountyil.gov; RESOLVER.ADR.RecipientNotFound.	Recipient not found by SMTP address lookup.
Jul. 29 550 5.4.1	Gmail DSN quoting the response of lakecountyil-gov.mail.protection.outlook.com; Recipient address rejected: Access denied.	Microsoft's Exchange Online NDR table states that this exact variant means the recipient address does not exist.

Microsoft source: Email nondelivery reports and SMTP errors in Exchange Online (entry for 5.4.1, "Recipient address rejected: Access denied").

I. June 23: exact message-level linkage to an operational mailbox rule

The outgoing message placed the exact address in CC. The reply arrived 101 seconds later from that address. Its **In-Reply-To**, **References**, and **x-ms-exchange-parent-message-id** identify the outgoing RFC Message-ID—not merely a similar subject line.

Outgoing Gmail ID	19ef5afba9d66ff2
Outgoing RFC Message-ID	<CABSQYDgN__N0kCdeAVgvgZEHnxsBVSZk4dyq7Zx69rX9jp1Ueg@mail.gmail.com>
Auto-reply Gmail ID	19ef5b14bc6788e6
Auto-reply RFC Message-ID	<4b3e6b3a368242ba9a30e920f69662ba@PH0PR09MB10589.namprd09.prod.outlook.com>
In-Reply-To	<CABSQYDgN__N0kCdeAVgvgZEHnxsBVSZk4dyq7Zx69rX9jp1Ueg@mail.gmail.com>
Exchange parent ID	<CABSQYDgN__N0kCdeAVgvgZEHnxsBVSZk4dyq7Zx69rX9jp1Ueg@mail.gmail.com>

Header / control	Observed value	Significance
Auto-Submitted	auto-generated	System-generated response.
Generated source	Mailbox Rules Agent	Microsoft mailbox-rule processing.
Inbox rules loop	fderosa@lakecountyil.gov	Exact address named by Exchange.
Originator / tenant	lakecountyil.gov dd536cf5-92fd-42ff-a754-e98666cb7a96	Lake County Microsoft 365 organization and tenant identifier.
Cross-tenant fields	AuthAs: Internal from-entity: Hosted	Microsoft marked the response as internal/hosted at origin.
Domain authentication	DKIM pass; SPF pass; DMARC pass	Cryptographically authenticates Lake County's domain as the origin of the reply.

Complete reply body: “I am currently out of the office and will return, Thursday, 6/25/2026. If you need immediate assistance, please call 847-377-7850.”

Gmail record 19ef5b14bc6788e6.

II. July 14: exact message-level linkage to RecipientNotFound

The later outgoing message again placed the exact address in CC. Nineteen seconds later, No-Reply@lakecountyl.gov returned a Microsoft 365 NDR. Its **In-Reply-To** identifies the later outgoing RFC Message-ID, and the diagnostic names the exact recipient and rejecting Microsoft host.

Outgoing Gmail ID	19f5e2bdb0c02ce44
Outgoing RFC Message-ID	<CABSQYDitEmfK7ut87rUFnjD8fJdPko-wR4pyOD0JvPvOvZDsOA@mail.gmail.com>
NDR Gmail ID	19f5e2c37358a2ae
NDR RFC Message-ID	<e26bbe6c-4acf-44c6-8c6c-0d337237b626@SJ0PR09MB6366.namprd09.prod.outlook.com>
NDR In-Reply-To	<CABSQYDitEmfK7ut87rUFnjD8fJdPko-wR4pyOD0JvPvOvZDsOA@mail.gmail.com>
Rejecting host	SJ0PR09MB6366.namprd09.prod.outlook.com

Operative Microsoft diagnostic:

“Your message to fderosa@lakecountyl.gov couldn't be delivered.”

“fderosa wasn't found at lakecountyl.gov.”

“550 5.1.10 RESOLVER.ADR.RecipientNotFound; Recipient fderosa@lakecountyl.gov not found by SMTP address lookup”

Microsoft 365 NDR, Gmail record 19f5e2c37358a2ae.

Header / control	Observed value	Significance
Auto-Submitted	auto-replied	Automated non-delivery report.
Return-Path	<>	Null reverse path customary for delivery-status messages.
X-OriginatorOrg	lakecountyl.gov	Lake County organization identified in message headers.
Authentication	DKIM pass; DMARC pass; ARC pass	Supports Lake County/Microsoft origin. SPF was none because the reverse path was null, not an SPF failure.
Transport	Google SMTP to Microsoft protection by TLS; Microsoft outbound to Gmail by TLS	The record reflects cross-system SMTP handling, not a Gmail client-side warning.

III. July 29: persistent rejection, different Microsoft status code

The third outbound message displayed the address as FDeRosa@lakecountyil.gov in CC. Fifteen seconds later, Gmail generated a delivery-status notification that quoted the remote response from Lake County's Microsoft Exchange Online Protection endpoint. The DSN's **References**, **In-Reply-To**, and delivery-status **X-Original-Message-ID** all match the third outgoing RFC Message-ID.

Outgoing Gmail ID	19fb05ece7f5a42d
Outgoing RFC Message-ID	<CABSQYDjWtJH6vL2Yk=d54zs=cY+XyPNc6DmSuwSgn_atgLqUPQ@mail.gmail.com>
DSN Gmail ID	19fb05f0765d5a9b
DSN RFC Message-ID	<6a6a974d.837427a8.df086.0b4a.GMR@mx.google.com>
References / In-Reply-To	<CABSQYDjWtJH6vL2Yk=d54zs=cY+XyPNc6DmSuwSgn_atgLqUPQ@mail.gmail.com>
Final-Recipient	rfc822; FDeRosa@lakecountyil.gov
Remote-MTA	lakecountyil-gov.mail.protection.outlook.com

Operative remote-server diagnostic preserved in the Gmail DSN:

“Your message wasn't delivered to FDeRosa@lakecountyil.gov because the address couldn't be found, or is unable to receive mail.”

“550 5.4.1 Recipient address rejected: Access denied. For more information see <https://aka.ms/EXOSmtpErrors> [BL02EPF0001B419.namprd09.prod.outlook.com 2026-07-30T00:14:05.229Z 08DEEDC046F778E5]”

Gmail delivery-status record 19fb05f0765d5a9b.

Delivery-status field	Exact value	Significance
Reporting-MTA	googlemail.com	Gmail generated the DSN after the remote rejection.
Action / Status	failed / 5.4.1	Permanent SMTP failure recorded for the exact final recipient.
Remote-MTA	lakecountyil-gov.mail.protection.outlook.com	Lake County's Microsoft 365 MX endpoint supplied the rejection.
Rejecting host	BL02EPF0001B419.namprd09.prod.outlook.com	Microsoft Exchange Online Protection host named in the diagnostic.
Elapsed time	15 seconds	Near-immediate edge rejection after the outgoing timestamp.

Comparison. This is not the same enhanced status code as the July 14 NDR. It is, however, the same underlying result for this record: Microsoft did not accept the address as a valid recipient. Microsoft's current Exchange Online NDR table describes 5.4.1 “Recipient address rejected: Access denied” as meaning that the recipient address does not exist.

IV. Integrity inventory and evidentiary boundary

Event / Gmail ID	RFC 822 bytes	SHA-256 of decoded Gmail raw bytes
1. 19ef5afba9d66ff2 June 23 outgoing preservation email	1,409,798	d66683cbb8323e5f58bdbfa7c2e65fdb6aba81f4b1b4f1cc8f9048e8d65fc8c4
2. 19ef5b14bc6788e6 June 23 Microsoft automatic reply	11,454	9a2af4d93a46a3516bd7c066e3e16bd575ebaf2d68042c520e1602fc4a890995
3. 19f5e2bdbc02ce44 July 13/14 outgoing demand	1,664,354	83ddf0092398723a00de581659bd9f625ba7c452c1ebe00aca55cef367e22989
4. 19f5e2c37358a2ae July 14 Microsoft non-delivery report	1,735,496	962a1ef0f9f7583c61c940a50ac3c33a76e7e7127ef85818968a32b895aa4649
5. 19fb05ece7f5a42d July 29 outgoing warrant / FOIA notice	2,208,435	bba5c8475d046ddbf4a13327c3ab7d265f183cd1246e57891241dc4a17e39f77
6. 19fb05f0765d5a9b July 29/30 Gmail DSN quoting Microsoft edge rejection	16,996	09927f2486ef1db80d493a417fee3fd66e3ec94e958791268e5deb032fcc5289

Established on the face of these records	Boundary / question requiring tenant records
On June 23, 2026 a Microsoft Mailbox Rules Agent response associated with the address was generated and linked to the outgoing message by exact RFC Message-ID fields.	The headers do not establish the recipient object's exact type, licensing state, employment status, or retention configuration.
The outgoing message copied the address and carried a written preservation demand. The automatic reply was generated 101 seconds later.	The transport record establishes transmission and system-level linkage; it does not show what a human read or what internal hold steps Lake County took.
On July 13, 2026 the address failed directory resolution: 550 5.1.10 RESOLVER.ADR.RecipientNotFound, "fderosa wasn't found at lakecountyil.gov."	The code records non-resolution at that time. Tenant records are needed to distinguish retirement, alias removal, disablement, conversion, synchronization, or another administrative cause.
On July 29, 2026 Lake County's Microsoft edge again rejected the address, this time with 550 5.4.1 Recipient address rejected.	The second rejection shows persistence of nonacceptance; it does not prove that historical mailbox content was destroyed or concealed.
The six native-message identifiers, RFC 822 byte lengths, and SHA-256 hashes make the observed transport records reproducible.	Only Entra ID, Exchange Online, retention, audit, and personnel records can identify who changed what, when, why, and whether content remained preserved.

Tenant records requested for a neutral forensic assessment

- A. Microsoft Entra ID / Active Directory user-object creation, disablement, deletion, restoration, and change history.
- B. Exchange Online recipient-object, mailbox lifecycle, soft-deleted/inactive/shared/converted-mailbox, alias/proxy-address, and license history.
- C. Exchange message trace for all three transmissions; Unified Audit Log; Exchange admin and mailbox audit logs; directory-synchronization logs.
- D. Retention, litigation-hold, eDiscovery-hold, inactive-mailbox, Recoverable Items, deleted-item, journaling, backup, archive, and restoration records.

- E. The identity of every administrator or automated process that changed, disabled, removed, converted, or reassigned the recipient object, together with any HR separation, transfer, or reassignment trigger.

Those records are maintained, if they exist and remain within applicable retention periods, in Lake County's environment. The transport evidence identifies a focused assessment window from June 23 through July 13, 2026. The requested records can determine the administrative event, the date and account associated with it, any documented business reason, and whether mailbox content remained preserved. This memorandum draws no conclusion about intent or content destruction without those records.

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 29, 2026



EXHIBIT I

**ARDC closure letters of June 18 and July 1, 2026 — and the
Administrator's standing invitation**

BOOSE-000024

*Nos. 2026IN03189, 2026IN03190, 2026IN03266 and 2026IN03281. Read the last substantive
paragraph of each: it is why Part VIII of this letter is arithmetic rather than rhetoric.*



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

One Prudential Plaza
130 East Randolph Drive, Suite 1500
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Fax (312) 565-2320

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Springfield, IL 62704
(217) 546-3523 (800) 252-8048
Fax (217) 546-3785

Ehab Allababidi
By Email: defcon5ready@gmail.com

Chicago
June 18, 2026

Re: Bailey Clare. Russell
No. 2026IN03189

Nicholas Shepherd
No. 2026IN03190

Dear Mr. Allababidi:

We have received your request for an investigation of attorneys Bailey Russell and Nicholas Shepherd.

The duties of this Commission relate primarily to investigating and prosecuting alleged violations of the Illinois Rules of Professional Conduct (IRPC) by lawyers. When we have sufficient evidence of one or more serious rule violations by an attorney, we may initiate proceedings seeking disciplinary sanctions against the lawyer, such as suspension or disbarment from the practice of law. This agency cannot and does not review decisions by judges, hearing officers and administrative law judges. From the information you have provided, we have determined that there is not a sufficient basis for this agency to investigate or pursue charges of professional misconduct against the attorneys and judge that you complained about.

Your complaint regarding attorney Bailey Russell relate to her effectiveness as your counsel. Allegations of ineffective assistance of counsel are appropriately addressed and resolved in the courts through motions, appeals, petitions for post-conviction relief, and other legal actions. Therefore, as a general policy, this Commission will not act on such allegations unless and until there has been a court finding that a lawyer was ineffective. If you have not already done so, you may wish to raise your concerns about their representation in court.

Your complaint regarding Assistant States Attorney Nicholas Shepherd, are essentially claims of prosecutorial misconduct. Such claims are appropriately addressed and resolved in the courts through motions, appeals and other legal actions. Therefore, in most instances, this Commission will not act on such claims unless a court has first found that a prosecutor acted improperly.

If, in the future, any court finds that the State or your defense counsel acted improperly in connection with your case, we invite you to send us a copy of the court's decision. At that time,

Ehab Allababidi
June 18, 2026
Page 2

we will determine whether further action by this office may be warranted. At this time, however, we will take no further action in the matter.

Although we are unable to take any action with respect to your requests, we thank you for taking the time to communicate with us regarding your concerns.

Very truly yours,

/s/ Christine P. Anderson

Christine P. Anderson
Senior Counsel
ARDC Intake Division

CPA:bd
4924-4552-7477, v. 1



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
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SUPREME COURT OF ILLINOIS
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Fax (217) 546-3785

Ehab Allababidi
By email: defcon5ready@gmail.com

Chicago
July 1, 2026

Re:

Francis Paul De Rosa
No. 2026IN03266

Gregory R. Ticsay
No. 2026IN03281

Dear Mr. Allababidi:

We have received your request for an investigation of attorneys Francis DeRosa and Gregory Ticsay.

The duties of this Commission relate primarily to investigating and prosecuting alleged violations of the Illinois Rules of Professional Conduct (IRPC) by lawyers. When we have sufficient evidence of one or more serious rule violations by an attorney, we may initiate proceedings seeking disciplinary sanctions against the lawyer, such as suspension or disbarment from the practice of law. This agency cannot and does not review decisions by judges, hearing officers and administrative law judges. From the information you have provided, we have determined that there is not a sufficient basis for this agency to investigate or pursue charges of professional misconduct against the attorneys that you complained about.

Your complaint regarding attorney Gregory Ticsay relate to his office's effectiveness as your counsel. Allegations of ineffective assistance of counsel are appropriately addressed and resolved in the courts through motions, appeals, petitions for post-conviction relief, and other legal actions. Therefore, as a general policy, this Commission will not act on such allegations unless and until there has been a court finding that a lawyer was ineffective. If you have not already done so, you may wish to raise your concerns about their representation in court.

Your complaint regarding Assistant States Attorney Francis Ticsay, are essentially claims of prosecutorial misconduct. Such claims are appropriately addressed and resolved in the courts through motions, appeals and other legal actions. Therefore, in most instances, this Commission will not act on such claims unless a court has first found that a prosecutor acted improperly.

If, in the future, any court finds that the State or your defense counsel acted improperly in connection with your case, we invite you to send us a copy of the court's decision. At that time,

Mr. Allababidi
July 1, 2026
Page 2

we will determine whether further action by this office may be warranted. At this time, however, we will take no further action in the matter.

Although we are unable to take any action with respect to your requests, we thank you for taking the time to communicate with us regarding your concerns.

Very truly yours,

/s/ Christine P. Anderson

Christine P. Anderson
Senior Counsel
ARDC Intake Division

CPA:ng
4901-6434-3993, v. 1



No. 2-26-0352

E-FILED
Transaction ID: 2-26-0352
File Date: 8/5/2026 1:46 PM

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

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

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.

NOTICE AND PROOF OF SERVICE

TO:	Christopher McCoy, Deputy Defender	Ehab Allababidi
	Jaime L. Montgomery, Assistant Deputy Defender	8516 W. Winona St.
	Office of the State Appellate Defender	Chicago, Illinois 60656
	Second Judicial District	defcon5ready@gmail.com
	Elgin, Illinois 60120	ehabhilfiger@gmail.com
	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 objection to defendant's motion to discharge appointed counsel and *pro se* motion to vacate the appointment of counsel in the above-entitled cause is being electronically filed with the Clerk of the Appellate Court, Second District, on August 5, 2026. Upon acceptance of the filing from this Court, the parties listed above will be served using the court's electronic filing system.

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